

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 12448/2020

Date of Institution ... 21.10.2020  
Date of Decision ... 14.09.2022

Imtiaz Hussain S/O Siraj Hussain R/O Char Diwar, Lower Kurram,  
District Kurram.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Home,  
Civil Secretariat, Peshawar and three others.

... (Respondents)

Barrister Kamran Qaisar,  
Advocate

... For appellant.

Muhammad Riaz Khan Paindakhel,  
Assistant Advocate General

... For respondents.

Rozina Rehman  
Fareeha Paul

... Member (J)  
... Member (E)

**JUDGMENT**

Rozina Rehman, Member(J): The appellant has invoked the jurisdiction of this Tribunal through above titled appeal with the prayer as copied below:

**“By accepting the instant appeal, the respondents may kindly be directed to pay pensionary benefits to the appellant as the appellant served for twenty two years with Zeal and Zest and the impugned dismissal order may please be set aside.”**

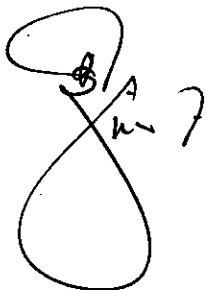
2. Brief facts of the case are that appellant was initially appointed as Constable (Sepoy) in Kurram Levy. He received fire arm injuries in the year 2009. Thus, remaining under treatment for a considerable period of time and having no male progeny, he could not contact the authorities at

the helm of affairs and thus he was marked absent which was not willful. However, he arrived at his duty in the year 2014 but was not allowed to join the same by telling him that he had already been terminated vide impugned order dated 28.05.2014. He filed departmental appeal but to no avail. He then filed writ petition which was dismissed, hence, the present service appeal.

3. We have heard Barrister Kamran Qaisar Advocate learned counsel for appellant and Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Barrister Kamran Qaisar Advocate, learned counsel for appellant submitted that the impugned order is against law and facts and norms of justice, therefore, not tenable and liable to be set aside. It was argued that no charge sheet alongwith statement of allegation was issued to the appellant before the impugned order which is violation of law and rules. He further contended that his absence was not willful but due to compelling circumstances which does not constitute any misconduct nor major punishment could be awarded on the said score. He, therefore, requested that the respondents may be directed to pay pensionary benefits to the appellant as he served for 22 years with zeal and zest.

5. Conversely, learned AAG submitted that appellant was appointed as Levy Sepoy in Kurram Levy Force on 10.05.1992 and he was gradually promoted to the rank of Naik. He was performing duty at Alizai Tehsil Lower Kurram. Consequent upon the recommendation made by the committee constituted for the monthly salaries disbursement purposes to ensure personal presence, he was found absent from his official duty. He contended that proper notices were issued but being



abroad, appellant could not assume his duty, therefore, he was terminated alongwith other Kurram Levy personnel on 28.05.2014 due to their willful absence from duty. He submitted that he was abroad and when Federal Levy was declared pensionable service, he started pouring applications in various fora for reinstatement which is not admissible under the service rules. Lastly, he contended that the appeal may kindly be dismissed being badly time barred.

6. From the record it is evident that appellant was serving in Kurram Levy Force. As per record, he was found absent from his duty by the authorities, thus, he was served with a proper notice by the committee constituted for disbursement of monthly salaries for ensuring personal presence of the force personnel, as required under the rules but the appellant being abroad, failed to report for duty, accordingly he was terminated from service under the rules. He approached august Peshawar High Court, Peshawar through Writ Petition No.1288-P/2015 which was dismissed on 05.12.2017. The record shows that as per stance of the appellant he was allegedly kidnapped by some unknown culprits however was recovered by the Pakistan Army during an operation in the area whereafter he approached respondents for duty where he came to know about his termination. In the body of memo of appeal, the stance of the appellant is that while fighting against the insurgents he got injured and sustained fire arm injuries, therefore, he remained under treatment for long time. Due to law & order situation and lack of communication he could not inform his high-ups. On the face of record, the appellant has brought nothing in black & white in shape of any report about his alleged abduction by the miscreants. He remained abroad since 2013 onward for earning of his livelihood and when he came to know that Federal Levy Service has been declared as



pensionable, he approached the respondents for his reinstatement in service so as to get dual benefit. The impugned order No.467-72/Kurram Levy was passed on 28.05.2014 vide which 17 Levy personnel were terminated from their service due to willful absence including the appellant. He filed departmental appeal on 17.09.2014 besides writ petition in the year 2015. His departmental appeal as well as his service appeal on 21.02.2020 are badly time barred.

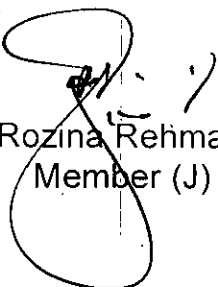
7. It is well-entrenched legal proposition that when an appeal before departmental authority is time barred, the appeal before Service Tribunal would be incompetent. In this regard reference can be made to cases titled Anwarul Haq v. Federation of Pakistan reported in 1995 SCMR 1505, Chairman, PIAC v. Nasim Malik reported in PLD 1990 SC 951 and State Bank of Pakistan v. Khyber Zaman & others reported in 2004 SCMR 1426.

8. Having considered the matter from all angles in the light of material available on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

14.09.2022

  
(Fareeha Paul)  
Member (A)

  
(Rozina Rehman)  
Member (J)

ORDER

14.09.2022

Appellant present through counsel.

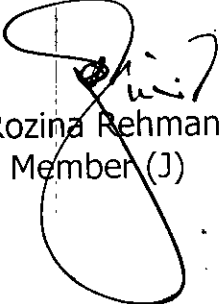
Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present. Arguments heard. Record perused.

Vide our detailed judgment of today of this Tribunal placed on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

14.09.2022

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

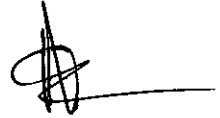
06.12.2021

Appellant in person present. Mr. Asif Masood Ali Shah,  
Deputy District Attorney for the respondents present.

Former sought adjournment on the ground that his  
counsel is not available today. Adjourned. Case to come up for  
arguments on 07.03.2022 before the D.B.



(Salah-ud-Din)  
Member (J)



Chairman

7-3-22

*Due to retirement of the Honble  
Chairman the case is adjourned on  
28-6-22*

*Shah  
Reddy*

28.06.2022

Appellant alongwith junior of his counsel present. Mr. Kabir  
Ullah Khattak, Additional Advocate General for respondents present.

Appellant requested for adjournment on the ground that his  
counsel has proceeded to Peshawar High Court, Mingora Bench,  
(Dar-ul-Qaza) Swat. Adjourned. To come up for arguments on  
14.09.2022 before the D.B.




(Rozina Rehman)  
Member (J)



(Salah Ud Din)  
Member (J)

07.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 15.07.2021 for the same as before.

  
READER

15.07.2021

Appellant in person and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Respondent No. 2 has furnished reply/comments. Remaining respondents have not submitted written reply. Learned AAG is required to contact them for submission of written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 06.12.2021 before the D.B.

*Stipulated period has passed and reply has not been submitted.*

  
Chairman

P.S

28.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.

  
Chairman



27.11.2020

Barrister Kamran Qaiser, for appellant is present.

The concise statement of what has been averred at the bar by the learned counsel representing appellant, is that being employed as Constable in the Kurram Levy, he received fire arm injuries thus remaining under treatment for a considerable period of time and having no male progeny, he could not contact the authorities at the helm of affairs and thus he was marked absent which was not willful. However, he arrived at his duty in the year 2014 but he was not allowed to join the same by telling him that he has already been terminated vide impugned order dated 28.05.2014 which was delivered to the appellant a month later. The efforts made by means of a departmental appeal did not materialize hence, the present appeal.

The points so agitated at the bar need consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 22.02.2021 before S.B.

Appellant Deposited  
Security & Process Fee  
27/12/2020

(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

22.02.2021

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Neither written reply on behalf of respondents submitted nor representative of the department is present, therefore, learned Additional Advocate General is directed to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 07.04.2021 on which date file to come up for written reply/comments before S.B.

(Muhammad Jamal Khan)  
Member

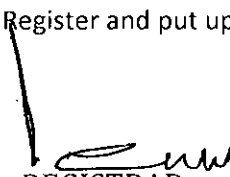



Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 12448 /2020 20

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	21/10/2020	<p>The appeal of Mr. Imtiaz Hussain presented today by Mr. Kamran Qaiser Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p>		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/11/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICE  
TRIBUNAL, PESHAWAR**

S.A.No. 12448 /2020

Imtiaz Hussain.....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through  
Secretary Home and others.....Respondents

**I N D E X**

S#	Description of documents.	Annexure	Pages
1.	Memo of appeal		1-4
2.	Addresses of parties		5
3.	Copy of service book	A	6-10
4.	Copies of medical receipts	B	11-19
5.	Copy of impugned order dated 28.05.2014	C	20
6.	Copy of appeal	D	21-23
7.	Copy of judgment dated 05.12.2017	E	24-26
8.	Copy of departmental appeal	F	27-29
9.	Wakalatnama		30

Dated: 20.10.2020

ایم تی ای  
Appellant

Through

  
**Barrister Kamran Qaisar**  
Advocate High Court

1

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICE**  
**TRIBUNAL, PESHAWAR**

S.A.No. 12448 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 11850

Dated 21/10/2020

Imtiaz Hussain S/o Siraj Hussain  
R/o Char Diwar, Lower Kurram, District Kurram.

..... Appellant

**VERSUS**

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Home,  
Civil Secretariat, Peshawar.
- ✓ 2) D.P.O, District Lower Kurram.
- 3) Inspector General of Police, Govt. of Khyber Pakhtunkhwa,  
Peshawar.
- 4) Deputy Commissioner, District Lower Kurram.

..... Respondents

**APPEAL U/S 4 OF THE KP SERVICE  
TRIBUNAL ACT, 1974 THAT THE  
APPELLANT SERVED THE KURRAM  
LEVY (NOW ADJUSTED WITH KP  
POLICE) FOR 22 YEARS AND THUS HE IS  
ENTITLED FOR PENSIONARY BENEFITS,  
WHICH THE RESPONDENTS ILLEGALLY  
AND UNLAWFULLY DENYING THE  
SAME. FURTHERMORE, THE  
IMPUGNED TERMINATION ORDER  
MAY PLEASE BE SET-ASIDE.**

Filed to-day

ow  
Registrar

21/10/2020

**RESPECTFULLY SHEWETH:**

Brief facts of the case are as under:-

- 1) That the appellant was initially appointed as Constable (Sepoy) in Kurram Levy and was gradually promoted to the rank of Nike. (Copy of service book is Annex "A")
- 2) That in the year 2009 the appellant while fighting against the insurgents got injured and sustained firearm injuries. (Copies of medical receipts are Annex "B")
- 3) That due to above mentioned firearms injuries, the appellant remained under treatment for long time.
- 4) That due to the law and order situation and lack of communication means the appellant could not informed the high-ups about his absence and thus he was considered as absent from duty.
- 5) That during the medical treatment and as there were no male family member the respondents put him absent from duty which was not willful, but due to the above situation.
- 6) That on arrival to the duty in the year 2014, the respondents didn't allowed the appellant to joint his duties and was told that he has been terminated vide the impugned order dated 28.05.2014, but the impugned order was given to the appellant almost more than a month later. (Copy of impugned order dated 28.05.2014 is Annex "C")
- 7) That the appellant filed appeal on 17.09.2014 against the impugned order before the than competent authority, but all in vain. (Copy of appeal is Annex "D")

- 8) That as the appellant got no favour from the then administration and thus filed WP No.1288-P/2015 before the hon'ble Peshawar High Court, which was dismissed on 05.12.2017. (Copy of judgment dated 05.12.2017 is Annex "E")
- 9) That the appellant filed appeal before respondent No.4, which was entrusted to respondent No.2 which is still lying on his table. (Copy of appeal is Annex "F")
- 10) That the appellant served the Levy Force for 22 years (now Police Department) and thus he is entitled for pension and gratuity and the impugned order dated 28.05.2014 was passed without any opportunity given to the appellant and thus the same is an illegal order and thus the appellant approach this hon'ble Tribunal for the following amongst other grounds:-



GROUNDS:

- a. That the appellant rendered meritorious service to the department. He was injured due to attack of militants, but never gave up intention to serve the force.
- b. That the appellant was attributed allegations of absent from service, but the same were neither willful nor intentional but due to the compelling circumstances.
- c. That neither any charge sheet, statement of allegation, show cause notice etc, was served upon the appellant nor any inquiry being mandatory, was conducted in the matter.
- d. That absence does not constitute any misconduct nor major punishment could be awarded to a servant on the said score.

- e. That legal requirement and codal formalities in the matter were not adhered to, what to speak of affording opportunity of personal hearing and defence.
- f. That impugned order is in violation of section 24-A of General Clauses Act as the competent authority has failed to cite any reason or justification in the said order.

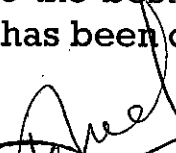
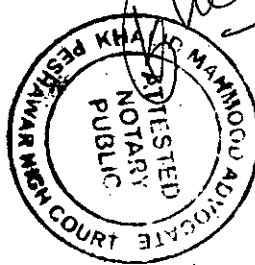
It is, therefore, prayed by accepting the instant appeal, the respondents may please be directed to pay pensionary benefits to the appellant as the appellant served for twenty two years with Zeal and Zeist and the impugned dismissal order may please be set-aside.

Dated:

  
 Appellant  
 Through   
**Barrister Kamran Qaisar**  
 Advocate High Court,

VERIFICATION

It is verified that, the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

  
  
 21-10-20

  
 Deponent

3

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICE  
TRIBUNAL, PESHAWAR**

S.A.No. \_\_\_\_\_/2020

Imtiaz Hussain.....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through  
Secretary Home and others.....Respondents

**ADDRESSES OF PARTIES**

**APPELLANT**

Imtiaz Hussain S/o Siraj Hussain  
R/o Char Diwar, Lower Kurram, District Kurram.

**RESPONDENTS**

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Home,  
Civil Secretariat, Peshawar.
- 2) D.P.O, District Lower Kurram.
- 3) Inspector General of Police, Govt. of Khyber Pakhtunkhwa,  
Peshawar.
- 4) Deputy Commissioner, District Lower Kurram.

ایساز  
Appellant

Through

  
**Barrister Kamran Qaisar**  
Advocate High Court

(7)

6

Amek

(A)

Note: The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name *Imtiaz Hussain*

2. Race *Hamza Khel*

3. Residence *Para. Chinax*



4. Father's name and residence *Siraj Hussain*

5. Date of birth by Christian era as nearly as can be ascertained *1-7-1968*

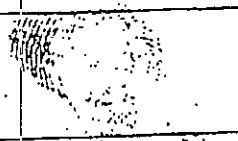
6. Exact height by measurement *5-5"*

7. Personal marks for identification *Black mole on lt. side of neck.*

8. Left hand thumb and Finger impression of (non-garreted) officer

*Attested*

Little Finger



Ring Finger



*Political Agent  
Karnal*

Middle Finger



Fore Finger



Thumb



9. Signature of Government servant *Imtiaz Hussain*

10. Signature and designation of the Head of the Office, or other Attesting Officer.  
*Muhammad  
Political Agent  
Karnal*

ATTESTED  
*KQ*

~~ATTESTED~~  
*(Signature)*



(7)

7

1	2	3	4	5	6	7	8
	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether substantive	Pay in substantive post	Additional Pay for officiating	Other emolument falling under rule 134	Date of appointment	State days
	vide pp's order No 381-84/18/1992					20/5/92	Just
	Septy BPSI (920-267310)						
	Septy	offg. TPA	920/-			12/5/92	
	"	offg. TPA	946/-			11/12/92	
	"	Temp P	972/-			11/12/93	
	Revised entries on Revision of 1/16/94						
	(1245-35-12201)		1315/-			1/16/94	
	"	"	1350/-			1/12/94	
	"	"	1385/-			1/12/95	
	"	"	1420/-			1/12/95	
	"	"	1455/-			1/12/97	
	"	"	1490/-			1/12/98	
	"	"	1525/-			1/12/99	
	"	"	1560/-			1/12/2000	
	B/S-I	Revised entries on Revision of 1-12-2001	1595/-			1-12-2001	
	1870-55-3520		2420/-				

ATTESTED  
KEQ

10	11	12	13		14	15	
			Nature and duration of leave taken	Allocation in period of leave on average pay upto four months for which leave salary is debitable to another Government			
Date and name of the officer	Period	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government or Servant
30/11/92	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-1-92 to 31-11-92
30/11/93	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-1-93 to 31-11-93
31/5/94	Rev. of pay		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-5-94 to 31-11-94
30/11/94	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-94 to 31-11-94
30/11/95	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-95 to 31-11-95
30/11/96	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-96 to 31-11-96
30/11/97	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-97 to 31-11-97
30/11/98	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-98 to 31-11-98
30/11/99	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-99 to 31-11-99
30/11/2000	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-2000 to 31-11-2000
30/11/2001	Rev. of pay		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-2001 to 31-11-2001
30/11/2002	Inc.		[Signature] For P.A. Kurram			[Signature] For P.A. Kurram	Service Verified From Service Book E.T.C. W.B.F. 1-11-2002 to 31-11-2002

ATTESTED  
KQ

ATTESTED



BPS-I

1820-55-3520	N	2475/-	1-12-2002
do	//	2530/-	1-12-2003
do	//	2585/-	1-12-2004
2150-65-4100 BPS-I	//	2995/-	1-12-2005
1-7-05-Revision		3060/-	1-12-05
do		3125/-	1-12-06
2530-85-5080 BPS-2		3635/- ✓	1-7-07
Revision of Pay 1-7-07		3720/- ✓	1-12-07
do			
3035-100-6035 Revised entries on Revision of Pay.			
(BPS-2)		4435/- ✓	01-7-2008
do		4535/- ✓	01-12-2008
do		4635/- ✓	01-12-2008
3035-100-6035 (BPS-2)			
3340-100-8140 (BPS-5) Revised entries upgradation from BPS-2 to BPS-5.			
do		4780/-	20-2-2010

ATTESTED  
KQ

ATTESTED



10	11	12	13	14	15
In and out of the service	Date of termination	Reason of termination	Allocation of period of leave	Signature of the officer	Reference to any records
Kurrum	30/11/2003	MCY		Service withdrawn from Service Book ETC. W.B.F. 1-12-2000 to 31-11-2003	
	11/2004	For Political Agent		Promoted as L. Naik	vide office order no.
	17/05	Political Agent		et.	
	30/11/05	Political Agent		POLITICAL AGENT KURRUM	
	7/07				
	30/11/07				
	30/6/08	Annul			
	30/11/08	Annul			
	30/11/08	Annul			
	20/2/10	Upgradation		ATTESTED KQ	[Signature]

ATTESTED  
KQ

[Signature]



11

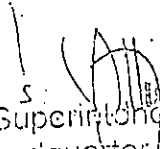
~~Annex~~ (B)

OFFICE OF THE MEDICAL SUPERINTENDENT AHQH: PARACHINAR.

CERTIFICATE.

It is Certified that Mr. Imtaiz Hussain S/O Siraj Hussain resident of Charfower Lower Kurram Agency was injured due to Fire Arm Injury (Vialor Injury) and admitted in Hospital on 01/07/2009 vide admission No. 9456

(Certificate issued on his own request)

  
Medical Superintendent,  
Agency Headquarter Hospital,  
Parachinar  
2-7-09  
Medical Superintendent,  
Agency Headquarter Hospital,  
Parachinar

**ATTESTED**

KA



(11) "A"

BETTER COPY

**OFFICE OF THE MEDICAL SUPERINTENDENT AHQH:**  
**PARACHINAR**

**CERTIFICATE**

It is certified that Mr. Imtiaz Hussain S/o Siraj Hussain resident of Chardawar Lower Kurram Agency was injured due to Fire Arm injury (major injury) and admitted in hospital on 01/07/2009. Vide admission No. 9156.

(Certificate issued on his own request)

Medical Superintendent  
Agency Headquarter Hospital  
Parachinar

Lt Col

Dr. Shahid Hamid Ch.

MBBS, FCPS (SURG)  
FCPS (Plastic Surg)  
Classified Plastic &  
Reconstructive Surgeon  
CMH Rawalpindi.  
051-561-111 Ext 270  
0300-5532782



12

لیفٹیننٹ کرنل ڈاکٹر  
شاہد حمید حیدری

ایم بی بی ایس، ایف سی پی ایس (سرجری)  
ایف سی پی ایس (پلاسٹک سرجری)  
کاماسیٹا میڈیکل کالج ایڈریگنڈ کونسنٹریشن سرجن  
سی ایم ایچ، راولپنڈی

آفس نمبر: 051-561-111 Ext 270  
موبائل: 0300-5532782

*Superior Revision*

*Bullet Injury (R) Hip*

*Scrub & Drain Popliteal Region*

*ACS / EMG*

LT COL  
SHAHID HAMEED  
FCPS (SURG) FCPS (PLAST)  
Plastic & Reconstructive Surgeon  
CMH

ATTESTED

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~~Signature~~  
ATTESTED

14/8/18

Richard H. Jones

Richard H. Jones

Richard H. Jones

Just completed Repair Work on

about on 25/9/17 for [unclear]

2879/9

ATTESTED  
KQ





# Jinnah Memorial Hospital

## Electrodiagnostic Medicine Procedures (Nerve Conduction Study/Electromyography etc)

2 - Civil Lines, Rawalpindi.  
Clinic : 051-5520431, 051-5527527-8 (206)  
Mobile : 0300-5197013  
Fax : 051-5520431

6140

Patient: Amrtaq Hussain  
Sex: 30y  
Age:  
Height: inches  
Weight: lbs  
I.D.#: 144  
Ref. M.D.: LT Col Dr Saadul Hameed Ch.

Address: Peshawar  
City:  
Phone:  
Physician:  
Test Date: 09/09/14

Consultant Plastic & Reconstructive Surgeon - CMU - Pak

new lesion to right / Pop region & Foot drop @ - ulnar

### Motor Nerve Study

#### Right Peroneal Nerve

Rec Site: EDB	Lat (ms)	Dur (ms)	Amp (mV)	Area (mVms)	Dist (mm)	C.V. (m/s)
Stim Site						
Ankle	1.3	0.0	0	0.0		
Fib.Head	1.3	0.0	0	0.0		
Pop.Fos.	1.3	0.0	0	0.0		

#### Right Tibial Nerve

Rec Site: AH	Lat (ms)	Dur (ms)	Amp (mV)	Area (mVms)	Dist (mm)	C.V. (m/s)
Stim Site						
Ankle	6.4	2.2	2.1	2.4		
Pop.Fos.	14.3	2.2	1.1	1.3	360	45.5

### EMG Study

Name	Ins	Act	Fibs	PSW	Fascics	Polyph	MU Amp	MU Dur	Config	Pattern	Recruit
R. Ext.Dig.Ln.	inc		2+	2+	none	none	no	voluntary		irregular	dec
R. Gastroc.Ln.H.	inc		none	none	none	inc+	inc	norm	poly	irreg	dec

### Conclusion

- \* Absent motor potentials in Peroneal nerve @, Fibrillations, Positive waves (involuntary activity / axonal degeneration) & no voluntary activity in Ant. Tibial muscle @
- \* Increased distal motor latency 6.4 msec (N - 6.5 msec) & reduced velocity 45 m/s (N - 50 m/s) - Tibial nerve @
- \* Polyphasic & reduced pattern - Gastrocnemius

- \* Incomplete Neurotmesis Peroneal component of sensation at Pop Fem @ Axonal degeneration & no evidence of recovery
- \* Partial injury Tibial component @

(Suggested: - Exploration of Peroneal nerve Neurectomy / repair plan.)

Brig (Dr) Pervaiz Hasan Khan Niazi  
MBBS FCPS FICS D Med Rehab RCP (London)  
Consultant Rehabilitation Medicine

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15

**COMBINED MILITARY HOSPITAL RAWALPINDI**  
**DISCHARGE NOTES AND FOLLOW UP PROFORMA**

DEPARTMENT:

Plastic Surg. WD

Tel No. \_\_\_\_\_

Attending Specialist:

Lt Col Shahid Hameed

Dated: 28/09/09

Name of Patient:

CNE  
Imtiaz Hussain

Age: 35 yrs.

Address/Unit:

Short History and Progress:

Gunshot wound right popliteal region.  
CPN injury.

Operative Procedure: - 26/9/09

Important Positive Findings:

wound exploration done.  
Nerve was found intact but  
entraped in scar tissue.  
Nerve was released from scar tissue  
& wound closed.

Important Investigations:

Pt is fit to be discharged.  
R<sub>1</sub>-

Treatment given in Hospital:

① Tab. Cefspan 400mg

1+0+0

② Tab. Artifen 50mg

1+0+1

Review in O.P.D. on Friday

Dr Ayesha Islam  
Res. Plastic Surgery  
CMH Rawalpindi

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P.T.O.

ATTESTED

Progress:

2/10/07

Wounds healing OK

DRAIN removed

ASD done

Adv

- Remove staples after 1 wk

- Review after 1 month

Treatment advised on Discharge:

at plastic Surg. OPD

*Samra*

DR - SAMRAGHIA

Plastic Surg

Specialist/MO's  
Signature

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17

17

Lt. Col Ehtesham ul Haq

MRCs (ED), FCPS (Surgery), FCPS (Plastic Surgery)

Plastic & Reconstructive Surgeon  
Department of Plastic Surgery  
CMH Rawalpindi.

0345-5993201  
Ph: \_\_\_\_\_

Date: \_\_\_\_\_

09/10/09

CPN Rt exploration

wound on

done well.

ADy  
- Review after 04 wks

→ - Col. Meoobal (700)  
to 4 wks

LT COL  
EHTESHAM UL HAQ  
CL. SURGEON

Combined Military Hospital  
Ph: 051-561111 Ext. 270

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18

27/6/09

Doing well

28/6

Review after  
03 months

might need

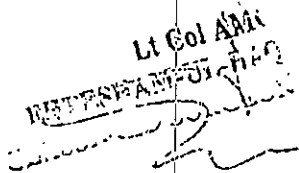
TP → TA Tfr  
if shows no  
improvement.

  
Lt Col AMC  
RETIRED

16/2/10

Doing well  
beginning good  
Dorsiflexion.

No further plastic  
interventions indicated

  
Lt Col AMC  
RETIRED

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KA

Serial No. 9203

# CASH RECEIPT CONSULTATION FEE

ORIGINAL  
Patient's Copy

19

Received from

700773

the sum of Rs. (in words)

8/2 Hundred only

On acct of CONSULTATION FEE

187

on behalf of (Spec)

Kt Lt E Meskan W/Hg

Rs.

600/2

Signature

[Signature]

Name

Sham

Rank

MHA

CMH Rawalpindi

Dated

27/8/89

Brig Dr Pervaiz Hasan Khan Niazi

SI (M) (R)  
MBBS, FCPS, FICS, D Med Rehab RCP (London)  
DIP Rehab Medicine (Austria, UK & Australia)

2 - Civil Lines, Rawalpindi

Professor of Rehabilitation Medicine  
Orthopaedic Medicine, Rheumatology,  
Sports Injuries, Electrophysiology, Medicine  
Neuromuscular disorders

Former

- Adviser Armed Forces of Pakistan
- Chief Instructor Armed Forces Post Graduate Medical Institute
- Commandant & Consultant Armed Forces Institute of Rehabilitation Medicine Consultant
- Military & Combined Military Hospitals Rawalpindi
- Supervisor & Examiner College of Physicians & Surgeons Pakistan
- Examiner Royal Australian College of Physicians Australia

7 in 9

Int'g Meskan

800-2000

To credit note on serial Hamid ch.

Trans 10

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[Signature]

طریقہ کار

طریقہ کار

طریقہ کار

Annex (C)  
20

OFFICE OF THE POLITICAL AGENT,  
KURRAM AGENCY, PARACHINAR

No. 467-72 / Kurram Levy  
Dated 28 / 05 / 2014.

ORDER.

Consequent upon the recommendation of the Committee constituted for the disbursement of monthly pay for ensuring personal presence of the Force personnel, the following Kurram Levy personnel found absent from their legitimate duties. They were served with notices to join their duties, but they failed therefore, they are hereby terminated from their service due to willful absence with immediate effect.

S. No.	Design	Name of Official	Parentage	Caste.	Resident	Sub-Division
1.	Naik	Imtiaz Hussein	Seraj Hussein	Hamzakhel	Chardiwal	Lower Kurram
2.	Naik	Eid Rehman	Ghazi Khan	Watizai	Charkhel	Lower Kurram
3.	L/Naik	Rajab Ali	Najaf Ali	Alizai	Pewar	Upper Kurram
4.	L/Naik	Sarfraz Hussein	Ashiq Hussein	Duperzai	Sultan	Upper Kurram
5.	L/Naik	Ikhitar Hussein	Ali Ghulam	Hamzakhel	Bilyamin	Lower Kurram
6.	Sepoy	Sher Muhammad	Sher Mehdi	Budakhel	Zeran	Upper Kurram
7.	Sepoy	Safar Ali	Gul Nabi	Budakhel	Bughaki	Upper Kurram
8.	Sepoy	Murtuza Hussein	Sardar Hussein	Duperzai	Burki	Upper Kurram
9.	Sepoy	Sadiq Ali	Dawan Ali	Hamzakhel	Malana	Upper Kurram
10.	Sepoy	Syed Zaheer Abbas	Syed Abbas	Turi Alizai	Town Com	Upper Kurram
11.	Sepoy	Raqeeb Ali	Farman Ali	Ghundikhel	Nastikot	Upper Kurram
12.	Sepoy	Syed Hassan	Syed Ali Akber	Hamzakhel	Kirman	Upper Kurram
13.	Sepoy	Rizwan Ali	Imran Ali	Duperzai	Alamsher	Upper Kurram
14.	Sepoy	Mahd Shabir Khan	Zahir Khan	Mangal	Pirgayum	Lower Kurram
15.	Sepoy	Zohaib Ali	Waris Ali	Turi Alizai	Alizai	Lower Kurram
16.	Sepoy	Muhamad Taib	Zaman Khel	Mangal	Pirgayum	Lower Kurram
17.	Sepoy	Mustaqim Khan	Juma Gul	Alisherzai	Murghan	Lower Kurram

Political Agent, Kurram.

No. and date is even.

Copy forwarded to the:-

1. Assistant Political Agent, Upper Kurram.
2. Assistant Political Agent, Lower Kurram.
3. Agency Accounts Officer, Kurram.
4. Political Tehsildar Alizai Lower Kurram.
5. Subedar Major Kurram Levy Force.
6. Official Concerned.

Political Agent, Kurram.

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KQ

Attested

قائم قید خانہ و ملازمان PAF / APA

اس میں وہ پندرہ دنہہ غور و نامت بحالی ملازمت درگرم لہوی فورسز یا کنورژن ڈسٹین

خانہ عالی :- گذشتہ قابل غور ہے۔ اس میں مورخہ 05 دسمبر 1992ء کو ایک سہ ماہی گروپ لہوی فورسز

میں تعیناتی ہو کر نامی گروپ تقریباً 20 سال خدمات انجام دی ہے۔ دوران سروس میں نہایت زیادتی اور فسادات سے لڑنے کی سزا دی ہے اور

انہی حکام بالا کو کسی قسم کی شکایت کا موقعہ نہیں دیا ہے۔ کہیں بد چلنی

سے رخصتی کی درخواستیں کی گئیں۔ 2009ء میں نامی گروپ

کے حجب زخم کیا۔ اس وقت حالات میں ناگفتہ بہ تھی۔ اور میں زیر غور رہا۔ اور مجھے

انہی حکام بالا کو اطلاع دینے کا موقعہ نہیں ملا۔ اور گروپ میں لہو کوئی ذمہ دار بندہ

نوجود نہ تھا۔ کروہ کار کو مطلع کرنا۔ جسکی وجہ سے مجھے سروس سے غیر حاضر

کے طور پر <sup>2014ء</sup> Dismiss کیا۔ میں غریب اور بال بچے دار ہوں۔

اپنے غریب گھرانے کا دھندا نہیں ہوں۔ اب بہتر طور کار تعمیر کی ہوں۔ کوئی اور

زراعت زمین میں نہیں رکھا۔ میں جا بوجھ کر غیر حاضر نہیں کیا ہے۔ بلکہ

حالات نے مجھے بہ سزا دی۔ لہذا سب طویل خدمات کے میں لہو حجب نہایت

بحال کیا جائے۔ یا سب طویل سروس کو نشین میں تبدیلی کی منظوری دی جائے

بہتر لہو کے تمام رہائش وغیرہ مسائل درخوست ہیں

17/09/2014  
Date  
Kashmiri Kurram Agency

سابقہ نائب گروپ لہوی فورسز ایسٹیا حسین ولد سردار محمد حنیف خاں سردار کوثر گروم

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ATTESTED



محکمانہ اپیل برطرف حکم مورخہ 14-05-28 جسکی رو سے ایپلانٹ کو نوکری سے بوجہ غیر

حاضری برخواست کہا گیا ہے۔

جناب عالی

سائل ایپلانٹ حسب ذیل عرض رساں ہے

۱۔ یہ کہ سائل ایپلانٹ بحیثیت سپاہی مورخہ 12-05-1992 کو کرم لیوی فورس میں بھرتی ہوا تھا۔ اور تقریباً بیس سال تک بطور سپاہی اپنی خدمات انتہائی فرض شناسی اور دیانتداری سے انجام دی ہیں

۲۔ یہ کہ ایپلانٹ بطور ملازمت سال 2009 میں دہشت گردوں کی فائرنگ سے زخمی ہو کر کافی مدت بستر عیالات پر گزارا ہوا اور بعد از صحت یابی دوبارہ اپنی نوکری پر حاضر ہوا، (میڈیکل رپورٹ لفٹ ہے)

۳۔ یہ کہ محکمہ ہذا نے سائل کی جاں نشاندہ صلاحیتوں کے عوض سائل کو سال 2012 میں سپاہی سے ترقی دے کر نائیک کے عہدے پر تعینات کیا۔

۴۔ یہ کہ سائل کو معلوم ہوا کہ ان کے چاہتے ہوئے ان کو انیٹیا اور دیگر فرائض سے ہٹا دیا گیا ہے۔ رکھا مگر 2014 کے حالیہ فوجی آپریشن شروع ہوتے ہی اگست 2014 میں سائل کو بھاگنے کا موقع ملا اور سائل دیگر اغوا شدہ لوگوں کے ہمراہ وہاں سے بھاگ نکلنے میں کامیاب ہو گیا۔

۵۔ یہ کہ سائل نے چند دن آرام کے بعد جب اپنے دفتر سے رابطہ کیا تو معلوم ہوا کہ دفتر والوں نے میری خبر گیری کرنے کی بجائے 28-05-2014 کو مجھے نوکری سے برخواست کر دیا ہے۔

۶۔ یہ کہ سائل ایپلانٹ نے متذکرہ بالا برخاستگی کے خلاف PA/APA کرم ایجنسی صاحبان کو اپیل کرتے ہوئے ملازمت پر بحالی کی استدعا کی اور بصورت دیگر برخاستگی کو پینشن میں تبدیل کئے جانے کی استدعا بھی کر دی۔ (اپیل مورخہ 17-09-2014) کی نقل لفٹ ہے۔

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۷۔ یہ کہ ایپلائٹ اسائل نے بار بار PAJAPA صاحبان کے دفتروں کے چکر لگائے، اور ہر دفعہ مجھے اطلاع دی گئی، کہ میری دائرہ کردہ اپیل پر ابھی کروائی نہیں ہوئی۔

۸۔ یہ کہ گزشتہ ہفتہ سائل نے جب PAJAPA کے دفتر میں جا کر اپنی اپیل کی معلومات کرنی چاہی، تو متعلقہ اہل کاروں نے جواب دیا کہ میری اپیل پر صاحبان کوئی کارروائی نہیں کرنا چاہتے اور حکم دیا ہے کہ سائل آپکو حکمانہ اپیل سب کروانے سے بعد سائل اپیل پلڈا نہیں کرتا ہے۔

۹۔ یہ کہ سائل کی غیر حاضری بوجہ اغواء وقوع پزیر ہوئی جبکہ سائل اپنے قیمتی 23 سال محکمہ ہذا کو پہلے ہی خدمات میں پیش کر چکا ہے۔

۱۰۔ یہ کہ سائل ایک انتہائی غریب گھرانے کا واحد کفیل ہے، اور سائل کا دیگر کوئی آمدنی کا ذریعہ بھی نہیں ہے جبکہ سائل کو پہلے اغواء کاروں نے سزا میں رکھا اور اب حکومت نے بے انصافی کا مظاہرہ کیا ہے۔ جو کہ کسی ظلم سے کم نہیں ہے۔

لہذا استدعا ہے کہ سائل ایپلائٹ کی برخاستگی کا حکم مورخہ 28-05-2014 منسوخ فرمائی جا کر سائل کو ملازمت پر بحال کیا جائے بصورت دیگر سائل کی برخاستگی کو ریٹائرمنٹ میں تبدیل فرمایا جاوے۔

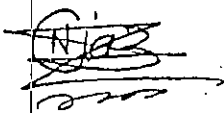
العبد  
انتہاز

انتہاز حسین ولد سراج حسین

سکنہ: چار دیواری، لوہڑ کرم

مورخہ: 02-01-2015

نواز محمد ایڈووکیٹ ہائی کورٹ پشاور



ATTESTED



IN THE PESHAWAR HIGH COURT,  
PESHAWAR,  
[Judicial Department].

Writ Petition No.1288-P/2015

Imtiaz Hussain s/o Siraj Hussain,  
r/o Char Diwar Lower Kurram.

Petitioner (s)

Versus

Political Agent Kurram Agency,  
And others.

Respondents

For Petitioner :-

Mr. Niaz Muhammad Advocate.

For Respondent :-

Mr. Muhammad

Date of hearing:

05.12.2017

JUDGMENT

ROOH-UL-AMIN KHAN, J:- By invoking the constitutional jurisdiction of this Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 (the Constitution), Imtiaz Hussain, the petitioner, seeks issuance of the following writ:-

**“To direct the respondents to reinstate him in service with all back benefits, and**

**Any other relief not specially asked for be granted in his favour.”**

2. In essence, grievance of the petitioner is that he was recruited as Constable in Kurram Levy Force vide order dated 12.05.1992. In 2009, as a result of attack by the miscreants, he sustained firearm injuries, however, on recovery; he joined his service and was promoted to the

*Rooh-ul-Amin Khan*

**ATTESTED**

*KQ*

rank of Naik. In the year 2013, he allegedly was kidnapped by some unknown culprits, however, was recovered/rescued by the Pakistan Army during an operation in the area, whereafter, he approached the respondents to report for duty, where he came to know about his termination from service vide order dated 28.05.2014. He impugned his termination order before the competent authority by filing appeal, but the same was dismissed, hence, this writ petition.

3. Comments of the respondents were called, which have been filed.

4. Having heard the arguments of learned counsel for the parties, it appears from the comments of the respondents that the petitioner was found absent from his duty by the authorities, thus, he was served with a proper notice by the Committee constituted for disbursement of monthly pay for ensuring personal presence of the Force personnel, as required under the Rules, but the petitioner being abroad, failed to report for duty, accordingly, he was terminated from the service under the Rules. On the face of record, the petitioner has brought nothing in black & white in the shape of any report about his alleged abduction by the miscreants, nor has brought a shred of documents that any member of his family has informed his department about his missing. Nothing is available on record to show that after his alleged abduction, the kith and

*Wokhina*

ATTESTED

*KQ*

kin of the petitioners approached the respondents for bringing the matter into their notice so much so no record whatsoever with regard to recovery of the petitioner by the Pakistan Army has been placed on record. The respondents in their comments have strongly controverted the stance of the petitioner by alleging that during interregnum period, the petitioner has remained abroad i.e. since 2013 onward for earning of his livelihood and when he came to know that the Federal Levy service has been declared as pensionable, he approached the respondents for his reinstatement in the service so as to get dual benefit. Keeping in view the controversial stance of the petitioner and assertions made by the respondents, the matter involves factual controversy which cannot be decided without recording pro and contra evidence, which is not the domain of this Court while dealing with a constitutional petition.

5. In view of the above discussion, this petition having no force stands dismissed.

Announced:

05.12.2017

Siraj Afridi P.S.

ATTESTED

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*Wahid Sami*  
JUDGE

*[Signature]*  
JUDGE

عالمی قدر جوائے شان و شوخیاں کھنڈر میں ڈھکی چھپی ہوئی حالت میں دسم اقبالہ

اسل و پندرہ غور بابت منظوری پیش

جوائے عالی :- گذشتہ پندرہ غور ہے کہ میں جا رہا ہوں اور کمزور ہونے کی وجہ سے اس کا منتقل ہونا ہوا ہے اور

مورخہ 05/12/1992 کو کمزور میں بطور سپاہی پھرتی ہو کر عرصہ 22 سالہ ملازمت میں بطور جوائے اور

پرورش ملی۔ دوران میں میں ایف اے اور ایف اے ڈی کے امتحان میں خدمات انجام دیے ہیں اور دوران

سروس میں مورخہ 07/07/2009 کو دھشت گردوں کے گولیوں سے شدید زخمی ہو گیا۔ منڈیکھل ریلوڈ وغیرہ شہاں

ہیں۔ گولیوں کے زخموں کے شہادت نامے اب بھی موجود ہیں۔ چونکہ مجھے زخموں کی وجہ سے تکلیف کا سامنا تھا۔

اور زبردستی تھا۔ مورخہ 28/05/2014 کو ایف اے ڈی کے امتحان میں شرکت کی اور اس وقت تک

جس میں سرفہرست غیر حاضر ایف اے ڈی کے امتحان میں شرکت کی۔ چونکہ میں پندرہ غور میں زبردستی تھا۔

اور مجھے بھی ان دیگر ایف اے ڈی کے امتحان میں شرکت کرنے کی ملازمت سے Terminate کیا گیا ہے

عالمی جوائے اسل و پندرہ غور کے 22 سالہ ملازمت کے خدمات انجام دیے ہیں۔ باقی

میں ریکارڈ بھی ہے۔ ملازمت اور ڈیوٹی میں کوئی دستہ پوشی یا کوتاہی نہیں کی ہے۔ اور حکام بالا کو

کبھی قسم کی شکایت کا موقعہ نہیں دیا۔ حکومت نے ایسی ملازمت کو پیش اسل و پندرہ غور میں جس میں دیگر

بیت سے ایف اے ڈی کے ساتھ ایسی ملازمت کو پیش کیا ہے۔ لیکن بد قسمتی سے 22 سال سروس کے باوجود

میں پیش میں خردم ہو گیا ہوں۔ غریب بال بچے دار ہوں۔ اور ایسے غریب گھر کا واحد کفیل ہوں

میں کوئی غیر حاضر نہیں کی ہے۔ جبکہ مجھے غیر حاضر ایف اے ڈی کے امتحان میں شرکت کرنا پڑا ہے۔ مورخہ 05/12/2014

میں بحال بیروزگار ہوں۔ اسل و پندرہ غور میں اسل و پندرہ غور کے 22 سالہ خدمات اور

دھشت گردوں کے گولیوں سے زخمی ہونے کے دوران سروس میں بھی لگی تھیں۔ مد نظر رکھ کر کم از کم مجھے پیش کی منظوری

SRE cler  
Pro mscat  
and males  
17/8/02

مورخہ 17/08/2020

کالی بنام DPo صاحب مندرجہ  
برائے اطلاع و رازداری

تقاضیات آپ کے بال بچوں کو دعائیں دوں گا

سابقہ ایف اے ڈی جوائے شان و شوخیاں کھنڈر میں ڈھکی چھپی ہوئی حالت میں دسم اقبالہ

ATTESTED  
KQ

عالمی قدر جات شان ڈپٹی کمشنر صاحب ٹریڈ ایبل ڈسٹرکٹ کرم دھام اقبالہ

اپنی دہم درجہ عوزر بابت منظوری پیش

جات عالی :- گذشتہ شخصہ الزور سے کہیں جا رہا لوگ کرم دھام کا مستقل باشندہ ہوں اور

مورخہ 05/12/1992 کو کرم ایجو فورس میں بطور سپاہی بھرتی ہو کر عرصہ 22 سالہ ملازمت میں بطور حوالدار

پر فوٹو ملی۔ دوران سروس میں ایمانداری اور دیاننداری و فرین شناسی خدمات انجام دیے ہیں اور دوران

سروس مورخہ 07/07/2009 کو دھشت گردوں کے گولیوں سے شدید زخمی ہو گیا۔ ٹیڈکل رپورٹ وغیرہ شامل

ہیں۔ گولیوں کے زخموں کے نشانات اب بھی موجود ہیں۔ خونخوار مجھے زخموں کی وجہ سے ٹیڈکل کا سامنا تھا۔

اور زیر علاج تھا۔ مورخہ 28/05/2014 پر لیوی ایٹکاران کے سترہ افراد کو بوجہ غیر حاضری پر فہستہ کیے گئے تھے

جس میں سرفہرست غیر حاضری ایٹکاران میں نام بھی شامل تھا۔ خونخوار میں بوجہ مجموعی زیر علاج تھا۔

اور مجھے بھی ان دیگر ایٹکاران میں شامل کر کے ملازمت سے Terminate کیا گیا ہے۔

عالمی جہ اس میں انہی عمر کی 22 سالہ ملازمت کر کے خدمات انجام دی ہیں۔ باقی

مہار ایٹکاران بھی دہشت۔ ملازمت اور ڈیوٹی میں کوئی جسم کوٹھی یا کوٹھی نہیں کی ہے۔ اور حکام بالا کو

کسی قسم کی شکایت کا موقعہ نہیں دیا۔ حکومت نے لیوی ملازمت کو پیش اپیل فرار دید باجے جس میں دیگر

نہایت سے ایٹکاران سابقہ لیوی والے مستفید ہو گئے ہیں۔ لیکن بد قسمتی سے 22 سال سروس کے باوجود

میں پیشین سے محروم ہو گیا ہوں۔ غریب بال بچے دار ہوں۔ اور اپنے غریب گھر کے گادا احد کفیل ہوں۔

میں کوئی غیر حاضری نہیں کی تھی۔ جبکہ مجھے غیر حاضری ایٹکاران کے لیٹ میں شامل کیا گیا ہے۔ مورخہ 28/05/2014

سے بحال بیروزگار ہوں۔ اس لیے آپ سے دہم درجہ اپیل ہے۔ کہ ازراہ کرم دھام 22 سال خدمات اور

دھشت گردوں کے گولیوں سے خونخوار دوران سروس مجھے لگی تھیں۔ مد نظر رکھ کر کرم دھام سے پیشین کی منظوری

دیکر رٹروٹھی اور جاہلور پیشین کی منظوری دیکر سیر غریب بال بچوں پر رحم کیا جائے۔

DPO  
For consideration  
periodical

17/9/20

17/08/2020

کالی نام: DPO صاحب ضلع کرم  
برائے اطلاع و درجی

سابقہ لیوی حوالدار امتیاز حسین ولد عمران حسین مندرجہ حوالدار لوگ کرم

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کرنور جناب والا شان DPO صاحب ضلع کرم درام اقبالہ

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درخواست گزار عدو حکم عد دفتر پولیس کے سر دلو اور سر میں  
کی مکمل ریکارڈ سب سے غزری نقول

SRC  
for n/a and  
rules

~~MAO~~

DPO/MAO  
13-8-2020

ذرا ہے۔ کہ میں بحیثیت حوالدار کرم لکی فورس  
22 سال سے سروس مکمل کی ہے۔ اور دوران خدمت کرتے ہوئے دو حادثات گروں کی فائبرنگ  
سے زخمی ہوئی تھی۔ مثلاً لعل البورٹ وغیرہ موجود ہیں۔

مجھے اپنے سروس کی مکمل ریکارڈ کی اشعار فرم ہے  
ازراہ کرم سر سے نقول مجھے سروس بک دلو اور حکم صادر کیا جائے

مکمل ریکارڈ ہوگی -  
عوض 13/08/2020

سابقہ کرم لکی حوالدار امتیاز حسین ولد سر اسامہ حسین کنڈ حوالدار کرم  
امتیاز

ATTESTED  
KQ



# WAKALATNAMA

30

## BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

IMTIAZ HUSSAIN

Petitioner(s)

Versus

Govt. of KPK and others

Respondent(s)

I, APPellant  
in the above noted Appeal, do hereby appoint and  
constitute BARRISTER KAMRAN QAISAR Advocate to  
appear, plead, act, compromise, give affidavit, withdraw or refer to  
arbitration to me/ us as my/ our Counsels in the above noted matter,  
without any liability for their default and with the authority to  
engage/ appoint any other Advocate/ Counsel at my/ our matter.

Dated: 20-10-2020



BARRISTER KAMRAN QAISAR

Advocate High Court

D-11, 4<sup>th</sup> Floor Haroon Mansion


Khyber Bazar, Peshawar

Bc-10-9458

CNIC No.173011-314823-5

Cell: 0333-4555502/ 0310-9405959

Email: kamranqaisar@gmail.com

  
Signature/ Thumb  
impress of the Client