20th July 2022

1. Counsel for the petitioner present. Syed Naseer Ud Din Shah, Asst: AG alongwith Mr. Shamriaz Khan, ASI for respondents present.

2. Respondents submitted copy of order No. 5486-87/E dated 11.03.2022 whereby in compliance of the judgment of the Tribunal, the grievance of the petitioner has been redressed. Since the order of the Tribunal has been complied with, therefore, the instant execution petition is filed. Consign.

3. Pronounced in open court in Camp Court Abbottabad and given under my hand and seal of the Tribunal on this 20^{th} day of July, 2022.



(Kalim Arshad Khan)

Chairman Camp Court Abbottabad 30.12.2021

Counsel for the petitioner present and requested for listing the execution petition at hands for today instead of 31.12.2021. Réquest is accorded. The petition at hands is listed for today.

The petitioner having at his credit, the judgment dated 28.06.2018 passed in Service Appeal No. 197/2016 has filed this Execution Petition seeking its execution. By said judgment, his appeal with reliance on previous judgment of the Tribunal passed in similar appeal, was allowed and the impugned order dated 22.04.2015 was modified to the extent that the appellant shall be deemed to have been confirmed from the date of officiating S.I i.e. 16.06.2010 instead of 22.04.2015. Copies of two orders one in favour of DSP Muhammad Ishtiaq and another in respect of DSP Zahidur Rehman both of Hazara Region Abbottabad have been annexed with the execution petition. They both have been granted conditional relief on implementation of the judgment passed in their respective appeals and were confirmed as S.Is from the relevant dates conditionally subject to outcome of CPLA filed by the respondents against the judgment of this Tribunal. It is mentioned in the order in favour of DSP Zahiduir Rehman that on decision of CPLA, if the judgment of Service Tribunal is set aside, this order (conditional order) will be considered as cancelled. If there is no restraining of the august Supreme Court of Pakistan in case of the petitioner, the respondents, in view of the precedents cited herein before, are directed to implement the judgment in favour of the petitioner in similar manner. Notice be given to the respondents for execution of the judgment in the given manner. Case to come up on 16.02.2022 before S.B at camp court, Abbottabad.

16-2-22.

Camp Court, A/Abad One to retire - ent of WUMILL chain-au the Tribund is you tructional. come up for the same du 20/2/22 at C. com

Chàirman

Form-A

FORM OF ORDER SHEET

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Court of_

Execution Petition No.

346 /2021

Order or other proceedings with signature of judge S.No. Date of order proceedings 2 3 1 The execution petition submitted by Mr. Razeem Khan 25.11.2021 1 through Mr. Muhammad Aslam Tanoli Advocate may be entered in the relevant register and put up to the Court for proper order please. REGISTRAR This execution petition be put up before touring S. Bench at 2-A.Abad on 31/12/21 CHA

BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

2021 Execution Petition No. 346

Razeem Khan, Inspector No. H-01, presently posted as G.O.

Versus

- Provincial Police Officer, KPK Peshawar. 1.
- RPO Hazara Region, Abbott bad......(Respondents) 2.

EXECUTION PETITON IN SERVICE APPEAL NO.197/2016.

S/No.	 Description of documents 		Page No.
1.	Execution petition.		01-05
2.	Service Appeal dated 10-11-2015	"A"	06-25
3.	KPK Service Tribunal Decision 28-06-2015	"B"	26-28
4.	Order dated 01-02019, 29-04-2019 and 26-07-2021	"C, D & E"	29-31
5.	Wakalatnama	· ·	

HROUGH

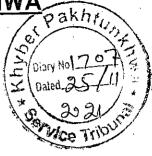
MOHAMMAD ASLAM TANOLI ADVOCATE HIGH COURT AT PESHAWAR

Dated: 25-11-2021

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BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 346/2021



<u>Versus</u>

1. Provincial Police Officer, KPK Peshawar.

2. RPO Hazara Region, Abbott bad......(Respondents)

EXECUTION PETITON IN SERVICE APPEAL NO.197/2016 FOR GRANT OF COFIRMATION, SENIORITY AND PROMOTON ON CONDITIONAL AND PROVISIONAL BASIS SUBJECT TO OUTCOME OF CPLA NO. 277-P/2018 FLED BY THE POLICE DEPARTMENT/RESPONDENTS AGAINST THE PETITIONER.

Respectfully Sheweth:

1.

That petitioner/appellant filed above titled service appeal before this Honorable Service Tribunal against the order dated 22-04-2015 of RPO Hazara Region Abbottabad/Respondent No.2 passed in flagrant violation and negation of the departmental rules & regulations and denied the appellant of his confirmation, seniority and promotion to the rank of Inspector with his colleagues. (Copy of the service appeal is attached as Annex-"A").

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2.

3.

That this Honorable Service Tribunal on acceptance of subject service appeal issued the judgment dated 28-06-2018 with the decision that <u>"appeal of the</u> appellant is allowed and the impugned order dated 22-04-2015 is modified to the extent that appellant shall be deemed to have been confirmed from date of officiating Sub.Inspector, i.e. 16-06-2010 instead of 22-04-2015". (Copy of judgment/order dated 28-06-2018 is attached as Annex-"B").

That respondents on receipt of judgment dated 28-06-2018 of this Honorable Tribunal instead of complying with the same they resorted to file CPLA No.277-P/2018 before the Apex Supreme Court of Pakistan Islamabad which despite lapse of 3 ½ years is still pending adjudication and even there is no expectation of its decision in near future. There is also no stay order from the Apex Supreme Court of Pakistan Islamabad in this respect. Petitioner's confirmation, seniority, promotion is badly affecting and he is sustaining financial loss while his colleagues are enjoying these rights. Petitioner's juniors have been promoted to the rank of Deputy Superintendents of Police (BPS-17).

example petitioner's colleagues That for "Muhammad Ishtiaq" DSP and Zahid-ur-ehman DSP who also filed similar service appeals before this Honorable Service Tribunal which were decided on 22-02-2018 & 19-02-2018 have been granted revised confirmation, seniority and promotion on conditional and provisional basis vide order dated 01-01-2019 & and Abbottabad RPO issued by 26-07-2021 Notification dated 29-04-2019 of IGP KPK Peshawar subject to outcome of CPLA filed by the Police Department before the Apex Supreme Court of Pakistan. (Copes of Orders/Notification dated 01-01-2019, 29-04-2019 & 26-07-2021 annexed as "C&D").

That despite petitioner's incessant approaches to respondents he has not been granted his confirmation/seniority and promotion at right place as decided by this Honorable Tribunal even on conditional and provisional basis subject to out come of CPLA filed by Police Department against

4.

5.

the petitioner. Hence this Execution Petition on the following:

GROUNDS:

A)

B)

That as this Honorable Service Tribunal in its judgment dated 28-06-2018 has decided that "appeal of the appellant is allowed and the impugned order dated 22-04-2015 is modified to the extent that appellant shall be deemed to have been confirmed from date of officiating Sub. Inspector, i.e. 16-06-2010 instead of 22-04-2015".

That departmental authorities/respondents are reluctant to pay heed to the decision dated 16-06--2018 of this Honorable Tribunal, despite lapse of 3 ½ years and there is no stay order against the above mentioned judgment hence instant execution petition.

C) That petitioner deserves to be granted confirmation/seniority and promotion at right place in the light of judgment/decision dated 28-06-2018 of this Honorable Service Tribunal as has been granted to his colleagues etc. D) That instant execution petition is well within time and this Honourable Service Tribunal has got every jurisdiction to entertain and adjudicate upon the same.

PRAYER:

It is, therefore, humbly prayed that this Honorable Service Tribunal may graciously be pleased to accept this Execution petition and issue necessary orders/directions to be respondents that petitioner be given provisional/conditional confirmation, seniority and promotion subject to outcome of CPLA No.277-P/2018 filed by police department/respondents against petitioner and with grant of all consequential service back benefits.

HROUGH

MOHAMMAD ASLAM TANOLI ADVOCATE HIGH COURT AT PESHAWAR

Dated: 25-11-2021

<u>AFFIDAVIT</u>

I, Razeem Khan petitioner do hereby undertake/solemnly affirm that the contents of fore-going petition are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this honorable court.

Dated: 25-11-2021

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Annex -A

Home,

Service Appeal No.

/2015

Razeem Khan, Inspector No. H-01, District Abbottabad, presently Investigation Wing, Lower Kohistan, District Kohistan. ...APPELLANT

VERSUS

of

Govt.

10 In M

Khyber Pakhtunkhwa, through Secretary

Peshawar. DIG Police, Hazara Division, Abbottabad. 2. IG Police, Khyber Fakhtunkhwa, Peshawar. 3. Habib ur Rehman, No. H/257, Posted at Mansehra. 4. Aurangzeb, No. H/258, Posted at Mansehra. 5. Sajjad Haider, No. H/261, Posted at Kohistan. 6. Muhammad Altaf, No. H/185, Posted at Mansehra. 7. Shah Nawaz, No. H/191, Posted at CCP, Haripur. - 8. Muhammad Khurshid, No. H/201, Posted at Mansehra. 9. Ghulam Mustafa, No .H/202, Posted at Kohistan. 10. Hazrat Nabi, No. H/206, Posted at Inv: Mardan. موال Muhammad Iqbal, No. H/211, Posted at EAC, Peshawar. 12. Altaf, No. H/31, Posted at Inv: Kohistan. 13.

14. SI Ibrar Khan, No. 08/H, Posted at Kohistan.

· .	15.	SI Muhammad Yaseen; No. 09/HF.R.P.
	16.	SI Iftikhar Ahmed, No. 10/H, posted at Mansehra.
•	17.	SI Zakir Hussain, No. 13/H, posted at Mansehra.
	18.	SI Muhammad Riaz, No. 14/H, posted at Haripur.
• •	19.	SI Muhammad Amjad, No. 15/H posted at Investigation Wing, Battagram.
	20.	Lady SI Samina Zaffar, No. 16/H posted at Haripur.
	21.	SI Bashir Ahmed, No. 17/H posted at Haripur.
·	22.	SI Mehboob, No. 18/H posted at Abbottabad.
	23.	SI Matloob Shah, No.19/H, posted at Mansehra.
	24.	SI Muhammad Hamayun, Wing, Abbottabad.
	25.	SI Farman Akhtar, No. 21/H posted at Islamabad Frontier House.
,	26.	SI Ashiq Hussain, No. 22/H posted at Operation Wing, Abbottabad.
	27.	SI Mukhtiar Ahmed, No. 23/H posted at Operation Wing, Battagram.
	28.	SI Adalat Khan, No. 24/H posted at Operation Wing, Abbottabad.
-	29.	SI Ghulam Muhammad, No. 25/H posted at Operation Wing, Mansehra.
	30.	SI Muhammad Javed, No. 26/H posted at Operation Wing, Mansehra.
	31.	SI Muhammad Iqrar, No. 29/H posted at Hangu.
	32.	SI Farhad Ali, No. 30/H posted at Special Branch.
	33.	SI Azam Ali Shah, No. 32/H posted at Abbottabad.
	34.	SI Arshad Hussain, No. 33/H posted at PTC Hangu.
	35.	a car needed at Torghar District.
r	36.	SI Shad Muhammad, No. 36/H posted at Torginal Zuran SI Fazal Wahab, No. 37/H posted at Special Branch.

37.	SI Jehanzeb Khan, No. 39/H posted at Investigation Wing, Mansehra.
38.	SI Muhammad Amin, No. 42/H posted at Traffic Khyber Pakhtunkhwa.
39.	SI Ehsan Shah, No. 44/H posted at Kohistan.
40.	SI Muhammad Yousaf, No. 46/H posted at Kohistan.
41.	Mansehra.
42.	Abbottabad.
43	SI Muhammad Rafi, No. 05/H posted at Police School of Intelligence, Abbottabad.
: 44	SI Muhammad IShaq, No. 06/H posted at Ithar.
45	SI Nisar Ahmed, No. 38/H posted at Operational Wing, Battagram.
46	. SI Chanwaiz Khan, No. 40/H posted at Investigation Wing, Abbottabad.
47	Kohistan.
48	. SI Daraz Khan, No. 78/H posted at Special Branch, Battagram.
49	. SI Saleem Rashid, No. 79/H posted at Operational Wing, Haripur.
50	
; 51	. SI Fazal ur Rehman, No. 83/H posted at Kohistan.
52	SI Muhammad Hayat, No. 84/H posted at Operational Wing, Upper Kohistan.
53	SI Muhammad Zakir, No. 85/H posted at Operational Wing, Upper Kohistan.
54	Kohistan. I. SI Gul Khatab, No. 87/H posted at Kohistan.
5	The No. 88/H posted at Elite Force, Peshawar.
A	

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56.	I over Kohistan	
57.	SI Amir Khatam, No. 90/H posted at Investigation Wing, Haripur.	н Х. А. А. А.
58.	SI Umar Zada, No. 91/H posted at Investigation Wing, Battagram.	
59.	SI Muhammad Resaan, No. 92/H posted at PTC Hangu.	
60.	SI Muhammad Khushal, No. 93/H posted Investigation wing,	
61.	SI Riasat Khan, No. 94/H posted at Investigation Wing, Abbottabad.	
· () -	SI Abdul Ghafoor, No. 95/H posted at Elite Force, Hazara.	
62.~	No. 96/H nosted at Elite Force, Hazard	
63.	SI Abdul Sattar, No. 90/11 posted at Police Training School, Swabi. SI Zulfiqar Ali, No. 97/H posted at Police Training School, Swabi.	· ·
64.	SI Zutilqar An, No. 97721 SI Muhammad Uzair, No. 98/H posted at Hattar, Haripur.	
65.	SI Muhammad Ozan, No. 99/H posted at Operational Wing, SI Tufail Muhammad, No. 99/H posted at Operational Wing,	· · · · · · · · · · · · · · · · · · ·
66.	Battagram.	
	SI Muhammad Munir, No. 100/H posted at City Haripur.	• •
67.	SI Muhammad Muhin, No. 101/H posted at Operational Wing, SI Muhammad Arif, No. 101/H posted at Operational Wing,	• •
68.	Abbottabad.	•
	Sadaqat Nisar, No. 102/H posted at Operational Wing, Mansehra.	;
69.	Sadaqat Nisar, No. 102/H posted at Operational Wing,	•
70.	Muhammad Arshad, No. 103/H posted at Operational Wing, Battagram.	
71.	Muhammad Asad Yousaf, No. 104/H posted at Elite Force, Hazara.	
72.	SI Mudassar Zia, No. 105/H posted at Investigation Wing, Abbottabad.	· · ·
73.	SI Muhammad Farooq, No. 106/H posted at Operational Wing, Mansehra.	
74.	SI Muhammad Asif, No. No. 107/H posted at CTD, Hazara.	/1
	SI Munaminiati Asii, 100 100 a SI Munaminiati Asii, 100 100 a SI Abdul Rauf, No. 108/H posted at Operational Wing, Lower	Adedd
75.	Kohistan.	AS
76.	SI Muhammad Riaz, No. 109/H posted at Operational Wing, Abbottabad	9
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SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974, AGAINST THE ORDER, DATED 22/04/2015, OF RESPONDENT NO. 2, VIDE WHICH THE APPELLANT, INSTEAD OF HAVING BEEN PROMOTED WITH EFFECT FROM 16/06/2010 I.E THE DATE ON WHICH OTHER EMPLOYEES BELONGING TO THE SAME BATCH, CADRE AND SENIORITY ALONGWITH THOSE BEING JUNIORS TO THE APPELLANT HAVE BEEN PROMOTED, HAS BEEN PROMOTED WITH EFFECT FROM 22/04/2015.

PRAYER: ON ACCEPTANCE OF THE INSTANT APPEAL, THE IMPUGNED ORDER, DATED 22/04/2015, MAY GRACIOUSLY BE SO AMENDED AS TO MAKE THE APPELLANT ENTITLED TO seniority and PROMOTION WITH EFFECT FROM 16/06/2010 instead of 22/04/2015 WITH ALL BACK BENEFITS.

Wester

Respectfully Sheweth;-

That appellant was appointed as Police Constable on 15/02/1984, had under gone lower class course in 1990, inter class course in 1994 and upper class course in 2007 from his respective District.

1.

2.

3.

4.

5.

That appellant was confirmed as Assistant Sub-Inspector (ASI) and placed on promotion list "E" on 06/04/2006. Copy of promotion order is annexed as Annexure "A".

That on the basis of the above mentioned seniority list, the appellant and his other co-servants, having same criteria, were promoted as SI with effect from 25/03/2008. Coy of promotion order is annexed as Annexure "B".

That the appellant remained on deputation to ITP from 13/10/2008 to 10/11/2013 and thereafter he was repatriated to his parent department.

That appellant's above mentioned deputation was not having any effect on his seniority and promotion and his seniority was reckonable as per the seniority list as mentioned above. That it is however, unfortunate that the Departmental Promotion Board, while considering the cases of confirmation of all S.Is including the appellant, refused to accord him the date of his seniority as mentioned in the "E" list merely on the ground that the appellant had not served as SHO out of his home district and therefore, was not entitled to the benefit of seniority under Police Rule 13.18 for promotion and consequently was not confirmed at par with other similarly placed police officers. Copy of the order dated 16/06/2010 is annexed as Annexure "C".

6.

7.

That being aggrieved against the above mentioned order dated 16/06/2010, the appellant filed departmental appeal, as provided under the law and, also, review petition thereafter, but his aforementioned representations were rejected thus compelling the appellant to approach the Honourable Service Tribunal by filing service appeal No. 343/2011. Copies of departmental appeal dated 12/07/2010, review application dated 24/12/2010 and Service Tribunal appeal No.

> . .

343/2011 are annexed as Annexure "D", "E" &

That it is pertinent to submit that respondents Nos. 4 to 76, despite being junior to the appellant in respect of their seniority have also been given precedence to the appellant and were also promoted vide the above mentioned order dated 16/06/2010.

9.

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That during the pendency of the above mentioned appeal No. 343/2011, another batch of employees, all the promotees as mentioned in the order dated 16/06/2010, including respondents Nos. 4 to 76 who were also junior to the appellant therein order of their seniority, were further promoted vide the order dated 16/06/2010 and the appellant once again, was not considered for the promotion. likewise series of annual promotion orders, in the year, 2011, 2012, 2013 and 2014 were made by the respondent authority but the appellant was not considered apparently for the reason that his service appeal No. 343/2011 was still pending decision. That, since the appeal in which the appellant had claimed his right of promotion/ seniority from the date of order dated 16/06/2010, the appellant, due to pendency of his appeal, had not considered it necessary to challenge the above mentioned intervening promotion order as he was confident that his appeal would restore to him his due right.

10.

11.

12.

That the appellant service appeal No. 343/2011 was still pending before the Honourable Service Tribunal when the respondent authority vide impugned order dated 22/04/2015, promoted the appellant with effect from 10/04/2015. Copy of the impugned order dated 22/04/2015 is attached as Annexure "G".

That as the impugned order, dated 22/04/2015, provided a fresh cause of action, the appellant was compelled by circumstances to withdraw his appeal No. 343/2011 with the permission to approach departmental authority for correction of the date of his original seniority as was recorded in the above mentioned list "E". The appellant's request for withdrawal of his appeal No. 343/2011 with the permission as was sought therein, was allowed and consequently the same was withdrawn. Copy of the order of this Honourable Tribunal dated 03/07/2015 is attached as Annexure

13.

That, on 06/07/2015, after three days of the above mentioned withdrawal order, the appellant challenged the impugned order dated 22/04/2015 by filing the departmental appeal to respondent No. 3. Copy of the departmental appeal is attached as Annexure "I".

14.

Pr 2 (m)

That the appellant, since the date of decision of his departmental appeal, continued to wait for decision thereon, but appellate authority has not yet decided the same and, therefore, in order to avoid the bar of limitation the instant appeal is being filed against the impugned order of the competent authority.

15. That the impugned order, on account of having not been made in accordance with law and rules

[&]quot;H".

governing seniority of the appellant, is liable to be set aside or so amended or modified as to make the appellant's promotion as to be effective from the date of 16/06/2010, inter-alia, on the following grounds;-

16

GROUNDS:-

a.

b.

That the impugned order is violative of the law regulatory seniority as contemplated under the Civil Service act, because the seniority of the appellant, under the law, was to be reckoned from the date when other servants belonging to same service and cadre, whether serving in the same department or office or not were promoted. The impugned order, therefore is not maintainable and as such is liable to be corrected accordingly.

That, seniority of the appellant was to be considered from the date of his regular appointment and in accordance with the "E" list as made and approved by the competent authority. Having failed to consider the relevant rules governing senior of civil servants, the impugned order is illegal and without jurisdiction and as such is liable to

correct.

C.

d.

That it is, also a settled principle of the law governing seniority of Civil Servant that civil servants, on their promotion to higher post, would retain their inter-se seniority as in the lower post. Having not followed the above mentioned principle, the impugned order as well as all other orders of promotion whereby the appellant has been deprived of his due seniority, are illegal and without jurisdiction:

That Police Rule 13.18, as far as the promotion of civil servant is concerned, is ultra vires of the statute and therefore, has no binding force as to deprive the appellant of the promotion to which he, otherwise, is competent and entitled. The appellant, on the basis of the above mentioned Police Mut Rules, could not be deprived or allowed to be superseded by his juniors in the matter of his promotion. The impugned order, having its history linked back to the reasons as mentioned in the promotion order dated 16/06/2010, is illegal and without jurisdiction.

That the condition for promotion or denial of promotion, merely on the ground that the appellant has not served as SHO, is absolutely unwarranted as the matter of appointment of SHO is entirely dependent upon the discretion of the competent authority and it is not always necessary that each and every SI be so appointed.

That the appointment of appellant as SHO was within the competence and discretion of competent authority. The SHO is not appointed by selection on the basis of specific examination, test, interview or selection, but is purely a matter within the discretionary power of the competent

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f.

authority and, therefore, the appellant, who otherwise was fit and competent having no adverse remarks of any kind on his service record, could not be deprived of his right of seniority for promotion on such a flimsy ground such as completed under Police

Rules 13.18.

g.

h.

That though the reference of Police Rules 13.18 has not be made in the impugned order dated 22/04/2015, yet the reason for non according the benefit of the appellant's actual date of seniority, traces back its history to the order dated 16/06/2010 hence the impugned order is illegal, void and without jurisdiction.

That by promoting the juniors respondents and ignoring the appellant despite being senior to them and having no stigma on his previous record of his service, is an act of discrimination and as such is violative of fundamental rights of the appellant. i. That instant of appeal is within the time as prescribed under the law.

It is, therefore, humbly prayed that, on acceptance of the instant appeal, all the orders since 16/06/2010, depriving the appellant of his right of promotion may graciously be set aside and or the same, including the impugned order dated 22/04/2015, be so amended or modified as to restore to the appellant his due right of seniority and promotion with effect from 16/06/2010 with all back benefits or any other relief as this Honourable Tribunal may deem proper, just and lawful also be granted.

PELL

Dated: 05/11/215

(Abdul Raheem Khan) &

(Altaf Hussain Shah) Advocates High Court, Abbottabad

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

Through;

...APPELLANT

i. That instant of appeal is within the time as prescribed under the law.

It is, therefore, humbly prayed that, on acceptance of the instant appeal, all the orders since 16/06/2010, depriving the appellant of his right of promotion may graciously be set aside and or the same, including the impugned order dated 22/04/2015, be so amended or modified as to restore to the appellant his due right of seniority and promotion with effect from 16/06/2010 with all back benefits or any other relief as this Honourable Tribunal may deem proper, just and lawful also be granted.

PELLA

APPELLANT

Through;

Dated: 05/11 /215

(Abdul Raheem Khan) Ż.

(Altaf Hussain Shah) Advocates High Court, Abbottabad

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. /2015

Razeem Khan, Inspector No. H-01, District Abbottabad, presently Investigation Wing, Lower Kohistan, District Kohistan.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Razeem Khan, Inspector No. H-01, District Abbottabad, presently Investigation Wing, Lower Kohistan, District Kohistan, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

Identified by;

(Abdul Raheem Khan) Advocate High Court, Abbottabad



Allida

A.



BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. ____/2015

Razeem Khan, Inspector No. H-01, District Abbottabad, presently Investigation Wing, Lower Kohistan, District Kohistan.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

APPLICATIONFORCONDONATIONOFDELAY,IFANY,INFLINGTHEINSTANTAPPEALUNDERSECTION5OFTHELIMITATION ACT.

Respectfully Sheweth;-

Rende

1.

That the instant appeal has been filed in this Honourable Tribunal and this application may kindly be considered as an integral part thereof.

2. That the impugned order dated 22/04/2015, having been during the pendency of the appellant's appeal No. 343/2011 and as such was illegal and void.

3. That the appellant was under the impression that the decision of appeal No. 343/2011 would ultimately prevail and the order dated 22/04/2015 being illegal and void, would become influctuous and ineffective, the pendency of the appeal No. 343/2011.

That the above mentioned appeal No. 343/2011, however was withdrawn when during the course of arguments and the above mentioned appeal the appellant realized the impact of the impugned order dated 22/04/2015 is being order giving rise to a fresh cause of action and hence the same was withdrawn with the permission of Honourable Tribunal to file departmental appeal against it.

That, appellant immediately after withdrawal of his appeal 243/2011, challenged the impugned order being filing departmental appeal and as such no un-necessary delay has been made. If however, any delay is found to have taken place, the same, being not willful or deliberate, may kindly be condoned as the same could be result of some sufficient cause or reasons beyond the control of the appellant.

It is, therefore, humbly prayed that on acceptance of this application the delay, if any may kindly be condoned.

APPELLANT

Through;

5.

(Abdul Raheem Khan) &

(Altaf Hussain Shah) Advocates High Court, Abbottabad

Dated: 05/11 /215 Allerde



BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. ____/2015

Razeem Khan, Inspector No. H-01, District Abbottabad, presently Investigation Wing, Lower Kohistan, District Kohistan.

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home, Peshawar &RESPONDENTS

APPLICATION FOR CONDONATION OF DELAY

<u>AFFIDAVIT</u>

I, Razeem Khan, Inspector No. H-01, District Abbottabad, presently Investigation Wing, Lower Kohistan, District Kohistan, do hereby solemnly affirm and declare that the contents of forgoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

EPONENT

Identified by;

(Abdul Raheem Khan) Advocate High Court, Abbottabad





Annex-B

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Pesha

BEFORE THE KITYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT, ABBOTTABAD.

Service appeal No. 197/2016

 Date of institution ...
 10.11.2015

 Date of decision
 28.06.2018

Razeem Khan, Inspector No. H-01, District Abbottabad, presently Investigation Wing, Lower Kohistan, District Kohistan. (Appellant)

Versus

The Government of Khyber Pakhtunkhwa through Secretary Home, Peshawar and others. (Respondents)

Present:-

1

M/S. Muhammad Aslam Khan Tanoli and Abdul Rahim Khan, Advocates

Mr. ZIAULLAH, Deputy District Attorney

MR. SUBHAN SHER, MR. AHMAD HASSAN, For respondents.

For appellant.

CHAIRMAN MEMBER. ATTESTED

JUDGMENT

SUBHAN SHER, CHAIRMAN:-

Arguments heard and record perused.

2. The short facts relevant for the disposal of the present appeal are stated here, that the appellant joined the Police Department as Constable in the year 1984 and got promotion to the rank of Sub-Inspector. However, in the meanwhile a meeting of DPC was held on 16.06.2010 wherein he was dropped from confirmation and his colleagues junior to him were confirmed. The same order was assailed in departmental appeal and then before this Tribunal. However, during pendency of the appeal, his services were confirmed as S.I but with immediate effect. So his appeal was disposed off and the appellant preferred departmental appeal which

じぶんり作用 Khyber Pakhtnukhwa Service Tribunal, Peshawar

was not responded, so he came in appeal again before this Tribunal for redressal of his grievances.

3. M/s. Muhammad Aslam Tanoli, Advocate, and Abdur Rahim; Advocate, the learned counsels for the appellant contended that the similar cases of similar facts and circumstances of other colleagues of the appellant were given benefits of confirmation from 16.06.2010. In support of their contentions, they produced two judgment of this Tribunal passed in service appeal No. 736/2016 titled "*Amjad Ali-vs-Government of Klnyber Pakhtunkhwa through Secretary Home and Triabl Alfairs Department. Peshawar and others*" decided on 21.02.2018 and service appeal No. 182/2017 titled "*Zahid Ur Rehman-vs-Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and another*" decided on 19.02.2018 and requested the Tribunal to direct the respondents that back benefits from the above mentioned date be given to the appellant.

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4. Mr. Ziaullah, learned Deputy District Attorney for respondents could not controvert the judgments of this Tribunal, however, he raised the question ATTESTEE limitation and requested this Tribunal to dismiss the appeal being time barred.

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Feshawar

5. Without discussing the merits of the case, this Tribunal would place reliance on the previous judgments of this Tribunal passed in similar appeals in which not only the facts and circumvents were discussed but even the question of limitation was also resolved. As such, following the previous those judgments of this Tribunal, appeal of the appellant is allowed and the impugned order dated 22.04.2015 is modified to the extent that the appellant shall be deemed to have been confirmed from the date of officiating S.I i.e 16.06.2010 instead of

26) 3

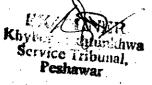
22.04.2015. In the circumstances of the case, parties shall bear their own costs.

File be consigned to the record room.

Announced 28.06.2018

J. _ Sw. 6, >0/8? Al- Ahurd Hassan Salf-Ahurd Hassan Names

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Date of Completion & Cont 11-07-16
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ORDER

DSP Muhammad Ishtiaq of this Region is hereby confirmed as SI with effect from 11-05-2004 on conditionally basis alongwith his colleagues i.e. above the name of SI Muhammad Ayaz (now DSP) as per judgment of Khyber Pakhtunkhwa Service Tribunal dated 22-02-2018 and directives received from CPO Peshawat vide Memo: No.4174/Legal dated 09-11-2018 till the outcome of CPLA No.298-P/2018 filed by Police Department before Supreme Court of Pakistan; on the decision of CPLA if the judgment of Service Tribunal set aside this order will be considered as cancelled.

Regional P olice Officer. Hazara Region Abbottabad

Phone No. 0992-9310021

Amex

0992-9310023

No. 112-15

IE, Dated Abbottabad the 01 - 01 12019.

Copy of above is forwarded for information and necessary

action to the:-

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Previncial Police Officer Khyber Pakhtunkhwa Peshawar w/r to his office Memo: quoted above. District Police Officer, Abbottabad. Superintendent of Police, Traffic Warden Abbottabad. DSP Legal Abbottabad.

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Ame-D OFFICI, OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA CUNTRAL POLICE OFFICE, PESHAWAR Fax; 091-9210927

Dated Peshawar the 29 April, 2019

NOTIFICATION

No.CPO/R-I/Revised Seniority/<u>Se4</u>. In compliance with the judgment of the Honorable Service Tribunal Khyber Pakhtunkhwa dated 22.02.2018 in Service Appeal No.28/2012, duly approved by the Inspector General of Police Khyber Pakhtunkhwa, the seniority of DSP Muhammad Ishtiaq is hereby revised by the rank of Deputy Superintendent of Police and his name is placed below the name of Mr. Saeed Akhtar DSP and above the name of Mr. Muhammad Ayaz DSP in the seniority list of DSsP issued vide No. 347/SE-1, dated 19.03.2019 conditionally and provisionally subject to outcome of CPLA No.298-P/2010 file by Police Department before Supreme Court of Pakistan

Sd/-

Muhammad Nacom Khan, Dr. PSP Inspector General of Police, Khyber Pakhtunkhwa, Poshawar

Endst: No. & date even.

Copy forwarded to the-

- 1: All Addl: IsGP in Khyber Pakhtunkhwa:
- 2. Denuty Inspector General of Police HOrs: Khyber Pakhtunkhwa.
- 3: All Regional Police Officers in Khyber Pakhtunkhwa.
- 4. AlG Legal Khyber Pakhtunkhwa Peshawar.
- 5. SP Court & Litigation CPO Peshawar.
- 6. PSO to IGP Khyber Pakhtunkhwa Peshawan
- 7. Registrar CPO Peshawat.
- 8. Supdt: Secret, & Supde E-II, GPO Peshawar.
- 9. Central Registry CPO Peshawar.
- 10. 11.0.P File.

(SADIQ BALOCH) PSP AIC Establishment, For inspector General of Police, Khyber Pakhtunkhwa, Peshawar.



OFFICE OF THE REGIONAL POLICE OFF HAZARA REGION, ABBOTTABAD 0992-9310021-22 🖺 -0992-9310023 🗹 r.rpohazara@gmail.com 0345-9560687 NO: 16688-92/E 2610712021 DATED

<u>order</u>

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Q.

DSP Zahid-ur-Rehman of this Region is hereby confirmed as SI with effect from 28-04-2000 on conditional/ provisional basis in light of judgment of Khyber Pakhtunkhwa Service Tribunal dated 19-02-2018 and the opinion given by DSP Legal Abbottabad vide letter No.39/Legal dated 13-07-2021. This confirmation will hold till the outcome of CPLA filed by Police Department before Supreme Court of Pakistan. If the Supreme Court set aside the judgment of the Service Tribunal then this order will be considered as cancelled abinition.

> A A Regional Police Officer, Hazara Region Abbottabad

Copy of above is forwarded for information and necessary action to the:-Provincial Police Officer, Khyber Pakhtunkhwa Peshawar. Assistant Inspector General of Police, Legal CPO Peshawar. District Police Officer, Abbottabad. Superintendent of Police, FRP Hazara Abbottabad. DSP Legal Abbottabad.

America

کورٹ فیس 12012(125 Petition ecution Cetition Setition مندرجه بالاعنوان ميں اپني طرف سے پيروى وجوابد بى مقام _/ ا پلر د و کبیے بدین شرط دکیل مقرر کیا۔ کہ میں ہر پیشی پرخود یا بذریعہ مختار خاص رد بروعدالت حاظر ،وتار ہوں گا۔ادر بونت بکارے جانے وکیل صاحب موصوف کواطلاع دے کر حاضر کروں گا۔اگر کسی پیش بیر مظہر حاضر ندہوا۔ اور حاضری کی دجہ ہے کسی دجہ پر مقدمہ میر بے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوئے۔ نیز وکیل صاحب موصوف صدر مقام کچہر کی کے علاوہ کی ادرجگہ یا کچہر کی کے مقرر اوقات سے پہلے یا بروز ^{نغ}طیل پیروی کرنے کے مجاز نہ ہونگے۔اگر مقدمہ مقام کچہری کے کسی اور جگہ ساعت ہونے پر یا بروز کچہری کے ادقات ک آگیایا پیچھے ہونے پر مظہر کوکوئی نقصان پنچے تو ذمہ داریا اس کے رابط کی معاد ضہاد اکرنے مختار نامہ داپس کرنے کے بهجى صاحب موصوف ذمه دارنه بوئكك مجصحل ساختذير داختة صاحب مثل كرده ذات خود تظور وقبول بهوگا اور صاحب موصوف کو عرضی دعوی اور درخواست اجرائے ڈگری دنظر ثانی ایپل نگرانی دائر کرنے نیز ہوشم کی درخواست پر دستخط تقسد بق کرنے کابھی اختیار ہوگا۔اور کسی علم یا ڈگری کے اجرا کرنے اور ہوشم کارو پیدوصول کرنے اور رسید دینے ادر داخل کرنے کا ہر شم کا بیان دینے اور سیر و ثالثی وراضی نامہ و فیصلہ برخلاف کرنے اقبال دعوے کا اختیار ہوگا۔ اور بصورت اپیل و برآ ، گی مقدمہ یا منسوخی ڈگری بیطرفہ درخواست تھم امتناعی یا ڈگری قبل از فیصلہ اجرائے ڈگری بھی صاحب موصوف کو بشرطادا میگی علیجدہ پیروی مختارنا مہ کر نیکا مجاز ہوگا۔اور بصورت ضرورت اپل یا اپل کے داسطے سی دوسرے دکیل یا بیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کوبھی اس امر میں دہی اختیارات حاصل ہوئے جیسے صاحب موصوف کو۔ بوری فیس تاریخ پیش سے پہلے ادانہ کروں گا۔ تو صاحب موصوف کو بورا اختیار ہوگا کہ مقدمہ کی پیردی نہ کریں اورا لیک حالت میں میر امطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔لہذامختار نام کھودیا ہے گر سندر سے مضمون مخارنامه بن لیا ہے اورا چھی طرح سمجھ لیا اور منظور ہے۔ مورفة بحد لوم 1502 · with 66/1

BEFORE THE SERVICES TRIBUNAL KPK PERMAWAR

TOKINUM KITANI SCITTURE TOTAL

Rateron Klaur BREVE...... Govt

Execution Petition Mo.,

APPLIGATION FOR REDRESSAL OF GRIEVENCES PLAINT No.197 197/2

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RESPECTFULLY SHEEWETH: -

the state of the state of the state

1. That the petitioner seniority was effected on as S.I confirmation and 20.6.2010. Wherin he was dropped and my collegues Junior to him were confirmed, The order was assailed in Departmental appeal and then before this Tribunal. However, during pendency of the ap the services was confirmed as S.I, but with immediate ef so my appeal was disposed out and the appealiant pretern which was not responded, so I cameagain before this Tribunal for redressal of grievences.wide came mo.197/20

2. Now on dated 28.0.2018 my appeal is allowed impugned order dated 22.4.2015 is modified to the exten that the appelliant shall be deemed to have been confir from the date of effectiating S.I. m.e 70.6.3010 instead 22.04.2015. as per cirmstances of above so it is reques may kindly be advised to the concerned department f to implement the order of the couse.

PETITIONER

RAZELI KHAN NO.M/OI INSPEN

07.09.2018. Certified to by ture copy VER Khyber Pakhtunkhwa

Service Tribunal, Pesbawar



ORDER

In compliance with the directives issued by CPO Peshawar vide letter No.68/CPB dated 28-02-2022, a committee was constituted in Region Office Hazara on 08-03-2022 vide order No.4832-33/E dated 04-03-2022. The committee recommended in light of Police Rules 13-18 the date of confirmation in the rank of Sub-Inspectors of following DSsP/ Inspectors and Sub-Inspectors is hereby revised as mentioned against their names:-

		Date of Promotion	Previous Date of	Revised Date of
S #	Rank, Name & No.	as Officiating	Confirmation as	Confirmation as
ψ		Sub-Inspector	Sub-Inspector	Sub-Inspector
1.	DSP Mukhtiar Ahmed	20-02-1998	19-09-2001	20-02-2000
2.	DSP Munir Hussain	15-04-1998	19-09-2001	15-04-2000
3.	DSP Tahir-ur-Rehman	20-06-1998	19-09-2001	20-06-2000
<u> </u>	DSP Muhammad Suleman	20-06-1998	19-09-2001	20-06-2000
5.	DSP Janas Khan	20-06-1998	19-09-2001	20-06-2000
<u> </u>		26-05-1987		5 . .
		Arrival from	11-05-2004	20-06-2000
6.	DSP Zulfiqar Jadoon	Balochistan Police	11-00 2001	
•		on 15-07-1998		
7.	DSP Asif Gohar	26-04-2000	19-09-2001	28-04-2002
8.	DSP Tahir Iqbal	26-04-2000	11-05-2004	28-04-2002
9.	DSP Khabir Muhammad	26-04-2000	11-05-2004	28-04-2002
<u> </u>	DSP Zahid-ur-Rehman	26-04-2000	11-05-2004	28-04-2002
11.	DSP Qamar Hayat	26-04-2000	11-05-2004	28-04-2002
12.	DSP Ijaz Ahmed	26-04-2000	11-05-2004	28-04-2002
13.	DSP Arshad Mehmood	26-04-2000	11-05-2004	28-04-2002
14.	DSP Javed Khan	26-04-2000	11-05-2004	28-04-2002
15.	DSP Mukhtar Hussain Shah	17-11-2001	11-05-2004	17-11-2003
16.	DSP Nazir Ahmed	17-11-2001	11-05-2004	17-11-2003
17.	DSP Saeed Akhtar	17-11-2001	11-05-2004	17-11-2003
18.	DSP Niaz Gul	17-11-2001	11-05-2004	17-11-2003
19.	DSP Muhammad Ishtiaq	17-11-2001	11-05-2004	17-11-2003
20.	DSP Muhammad Mahroof	17-11-2001	20-03-2009	17-11-2003
21.	DSP Muhammad Ayaz	17-11-2001	11-05-2004	17-11-2003
22.	DSP Jamil Akhtar	17-11-2001-	11-05-2004	17-11-2003
23.	DSP Rahim Hussain	17-10-2002	27-03-2008	17-10-2004
24	DSP Zahir-ur-Rehman	17-10-2002	27-03-2008	17-10-2004
25.	DSP Amjad Hussain	17-10-2002	27-03-2008	17-10-2004
26.	DSP Habib-ur-Rehman	20-02-2003	16-06-2010	20-02-2005
20.	DSP Aurangzeb	04-12-2004	16-06-2010	04-12-2006
28.		04-12-2004	19-07-2011	04-12-2006
	DSP Nazia Noreen	09-12-2004	27-03-2008	09-12-2006
29.	DSP Shahzadi Noshad Gillani	09-12-2004	27-03-2008	09-12-2006
	Inspector Liaqat Khan No.H/54	20-05-2005	04-11-2012	20-05-2007
<u>31</u> 32	DSP Muhammad Rizwan	28-12-2005	27-03-2008	28-12-2007
32.	DSP Jehangir Khan	28-12-2005	27-03-2008	28-12-2007
		08-04-2008	31-08-2012	08-04-2010
34.	DSP Mullaninad iqra	08-04-2008	16-06-2010	08-04-2010
35.		08-04-2008	16-06-2010	08-04-2010
36.	DSP Munammau Knursheeu		l	

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11	· · · · · · · · · · · · · · · · · · ·			
137.	Inspector Razeem Khan No.H/01	08-04-2008	10-04-2015	08-04-2010
₿ 38. 139.	DSP Muhammad Altaf DSP Ibrar Khan	08-04-2008	16-06-2010	08-04-2010
40.	DSP Muhammad Yaseen	19-09-2008	19-07-2011	19-09-2010
41.	DSP Iftikhar Ahmed	19-09-2008	19-07-2011	19-09-2010
42.	DSP Farhad Ali	19-09-2008 19-09-2008	19-07-2011	19-09-2010
43.	DSP Zakir Hussain	19-09-2008	<u>31-08-2012</u> 19-07-2011	<u>19-09-2010</u> 19-09-2010
44.	DSP Azam Ali Shah	19-09-2008	31-08-2012	19-09-2010
45.	DSP Samina Zafar	19-09-2008	19-07-2011	19-09-2010
46.	DSP Raja Mehboob	19-09-2008	19-07-2011	19-09-2010
<u>47.</u> 48.	DSP Muhammad Hamayun	19-09-2008	19-07-2011	19-09-2010
<u>40.</u> 49.	DSP Mukhtiar Ahmed DSP Ghulam Muhammad	19-09-2008	19-07-2011	19-09-2010
50.	Inspector Muhammad Sohail No.H/07	19-09-2008	19-07-2011	19-09-2010
<u>50.</u> 51.	DSP Arshad Hussain	28-08-2009	31-08-2012	28-08-20114
52.	DSP Matloob Khan	28-08-2009 28-08-2009	31-08-2012 31-08-2012	28-08-2011
53.	DSP Shah Nawaz	28-08-2009	31-08-2012	28-08-2011" 28-08-2011
54.	DSP Raja Mukhtiar	28-08-2009	31-08-2012	28-08-2011
55.	DSP Fazal Wahab	28-08-2009	31-08-2012	28-08-2011
56.	DSP Jehanzeb	28-08-2009	31-08-2012	28-08-2011
57.	DSP Muhammad Amin	28-08-2009	31-08-2012	28-08-2011
<u>58.</u> 59.	DSP Muhammad Yousaf	13-10-2009	21-08-2012	13-10-2011
<u>. 59.</u> 60.	DSP Muhammad Sajjad DSP Fida Muhammad	13-10-2009	31-08-2012	13-10-2011
00.		13-10-2009	31-08-2012	13-10-2011
~		10-05-2008 Arrival from	02-02-2011 Arrival from	-20
61.	Inspector Taifoor Khan	Balochistan Police	Balochistan Police	03-11-2011
		on 03-11-2011	on 03-11-2011	× 1046
		24-07-2007	25-07-2009	
62.	Inspector Muhammad Ajmal No.H/72	Arrival from Sindh	Arrival from Sindh	07-01-2014
		Police on	Police on	201 01-2014 24 14
63.	Inspector Muhammad Arshad No.H/41	<u>07-01-2014</u> 23-02-2012	07-01-2014 31-03-2014	23-02-2014
64.	Inspector Muhammad Tahir No.H/56	23-02-2012	31-03-2014	23-02-2014
65.	Inspector Muhammad Rafi No.H/05	23-02-2012	31-03-2014	23-02-2014
66. *	Inspector Sajjad Muhammad No.H/73	23-02-2012	31-03-2014	23-02-2014
67.	Inspector Muhammad Riafat No.H/57	23-02-2012	31-03-2014	23-02-2014
68. 69.	Inspector Muhammad Javed No.H/58	23-02-2012	31-03-2014	23-02-2014
70.	Inspector Raja Khan No.H/60	23-02-2012	31-03-2014	23-02-2014
71.	Inspector Masood Khan No.H/61 Inspector Sheeraz Ahmed No.H/62	23-02-2012	31-03-2014	23-02-2014
72.	Inspector Muhammad Gulzar No.H/63	<u>23-02-2012</u> 23-02-2012	<u>31-03-2014</u> 31-03-2014	23-02-2014
73.	Inspector Qamar Zaman No.H/81	23-02-2012	31-03-2014	23-02-2014
74.	Inspector Iqbal Hussain No.H/74	23-02-2012	12-09-2014	23-02-2014
75.	Inspector Faisal No.H/64	23-02-2012	31-03-2014	23-02-2014.
76.	Inspector Muhammad Nazir No.H/65	23-02-2012	31-03-2014	23-02-2014
77.	Inspector Muhammad Shaheen No.H/66	23-02-2012	31-03-2014	23-02-2014
78.	Inspector Abdul Hafeez No.H/67	23-02-2012	31-03-2014	23-02-2014
<u>79.</u> 80.	Inspector Muhammad Tanveer No.H/68	23-02-2012	31-03-2014	23-02-2014
<u>81.</u>	Inspector Muhammad Farooq No.H/106 Inspector Syed Rahim Shah No.H/69	23-02-2012	31-03-2014	23-02-2014
82.	Inspector Muhammad Sabir No.H/70	<u>23-02-2012</u> 23-02-2012	<u>31-03-2014</u> 31-03-2014	23-02-2014
83.	Inspector Shah Jehan No.H/71	23-02-2012	31-03-2014	23-02-2014 23-02-2014
84.	Inspector Muhammad Waheed No.H/77	23-02-2012	12-09-2014	23-02-2014
85.	Inspector Beroz Khan No.H/80	23-02-2012	02-10-2014	23-02-2014
86.	Inspector Nisar Ahmed No.H/38	23-02-2012	10-04-2015	23-02-2014
87.	Inspector Chanwaiz Khan No.H/40	23-02-2012	10-04-2015	23-02-20.14
	Inspector Akhtar Zaman No.H/59	23-02-2012	10-04-2015	23-02-2014
88.			40.04.0045	00 00 001
88. 89. 90.	Inspector Saleem Rashid No.H/79 Inspector Sarwaiz Khan No.H/82	<u>23-02-2012</u> 23-02-2012	<u>10-04-2015</u> 10-04-2015	23-02-2014 : 23-02-2014 :

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Page 2 of 6

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267.	SI Qamar Zaman No.H/227	01-08-2016	03-12-2019	01-08-2018
268.	SI Sadar Ayub No. H/229	01-08-2016	03-12-2019	01-08-2018 -
269.	SI Ghulam Mustafa. No.H/228	01-08-2016	03-12-2019	01-08-2018
270.	SI Muhammad Sharin No.H/235	01-08-2016	07-05-2021	01-08-2018
271.	SI Shamraiz No. H/230	01-08-2016	03-12-2019	01-08-2018
272.	SI Abdul Rehman No.H/236	01-08-2016	07-05-2021	01-08-2018
273.	Si Ghulam Murtaza No.H/226	01-08-2016	03-12-2019	01-08-2018
274	SI Inam-ul-Haq No.H/237	06-12-2016	07-05-2021	06-12-2018
275.	SI Amjad Hussain No. H/238	06-12-2016	07-05-2021	06-12-2018
276.	SI Muhammad Nazir No.H/256	06-12-2016	07-05-2021	06-12-2018
277.	SI Muhammad Irfan No.H/231	06-12-2016	03-12-2019	06-12-2018
278.	SI Bakht Rawan No.H/239	06-12-2016	07-05-2021	06-12-2018
279.	SI Sakhawat Khan No. H/240	06-12-2016	07-05-2021	06-12-2018
280.	SI Abid Hussain No.H/241	06-12-2016	07-05-2021	06-12-2018
281.	SI Gul Nawaz No. H/232	06-12-2016	03-12-2019	06-12-2018
282.	SI Muhammad Hamayun No.H/242	06-12-2016	07-05-2021	06-12-2018
283.	SI Muhammad Shakeel No.H/243	06-12-2016	07-05-2021	06-12-2018
284.	SI Muhammad Javed No. H/244	06-12-2016	07-05-2021	06-12-2018
285.	SI Ibrar Hussain Shah No. H/245	06-12-2016	07-05-2021	06-12-2018
286.	SI Naeem Shah No. H/246	06-12-2016	07-05-2021	06-12-2018
287.	Si Muhammad Shafiq No. H/247	06-12-2016	07-05-2021	06-12-2018
288.	SI Ibrar Shah No. H/248	06-12-2016	07-05-2021	06-12-2018
289.	SI Jehanzeb No H/249	06-12-2016	07-05-2021	06-12-2018
209.	SI Muhammad Rafique No.H/257	31-08-2017	07-05-2021	31-08-2019
290.	SI Gul Nawaz No.H/258	31-08-2017	07-05-2021	31-08-2019
	SI Zulfigar Ali No.H/259	31-08-2017	07-05-2021	31-08-2019
292.	SI Muhammad Saleem No.H/260	31-08-2017	07-05-2021	31-08-2019-
293.	SI Muhammad Nawab No.H/261	31-08-2017	07-05-2021	31-08-2019
294.	SI WURAININAU NAWAD NO. 17201	01002011		117

MIRVAIS NIAZ (PSP) Regional Police Officer Hazara Region Abbottabad

Copy of above is submitted for favour of information

necessary action to the:-

1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.

2. Assistant Inspector General of Police, Establishment Khybe

Pakhtunkhwa Peshawar.

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