


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1507/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	3
1-	19/10/2022	<p>The appeal of Mr. Muhammad Shakeel Khan resubmitted today by post through Mr. Faizan Zaidi Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>



The appeal of Mr. Muhammad Shakeel Khan Ex-Constable No. 115 District Police D.I.Khan received today i.e. on 03.10.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of order dated 18.6.2019 and letter dated 19.8.2019 mentioned in para-5 of the memo of appeal are not attached with the appeal which may be placed on it.
- 2- Page nos. 11, 14 to 18, 23, 38 and 39 of the appeal are illegible which may be replaced by legible/better one.

No. 2767 /S.T,

Dt. 07/10 /2022

Mr. Faizan Zadi Adv.
High Court D.I.Khan


REGISTRAR 
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.



To,

The Registrar,

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Subject: REPLY TO THE OBJECTIONS MADE IN SERVICE ~~DIARY~~ NO.. 1480/2022

Respected SIR,

The counsel for the appellant humbly submits as under:

1. Reply to the objection no. 1 is that the order dated 18.06.2019 is already annexed as annexure D & F on the page number 18 and also as per the objection of your this worthy Service Tribunal Registrar's Office its better copy has been annexed as 18/1 further the objection pertaining to the date as 19.08.2019 mentioned in para no. 5 of the memo of appeal is actually the date on which the order dated 18.06.2019 was issued to/received by the appellant from the office of Regional Police officer, Dera Ismail Khan and no such separate letter was issued to the appellant regarding receiving of the order dated 18.06.2019 but the only stamp on the order was affixed which mentioned the date of receiving as 19.08.2019.
2. Reply to the objection no. 2 is that all the better copies of the illegible pages have been annexed as 11/1, 14/1, 15/1, 15/2, 16/1, 17/1, 18/1, 23/1, 38/1, & 39/1 Respectively.

NOTE: the appellant had submitted all the original documents with his Ex- Appeal No. 1637/2019 which was later on treated as Departmental Representation by this worthy Service Tribunal vide order dated 28.06.2022.



It is, therefore, humbly requested that all the better copies annexed with the original file as well as with the respondents' copies be accepted and be considered part and parcel of the same.

Note: Original order of objections kept in my office

copy dispatched with the original file.

Dated: 18 /10/2022

Your Humble

**Faizan Zaidi Advocate
High Court.**

Cell phone: 03119939674



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Ex Service Appeal/Departmental Representation No.1637/2019.

In service Appeal No. 15072022

Muhammad Shakeel Khan VERSUS
(Appellant)

PPO KPK etc
(Respondents)


I N D E X

S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit	--	3- 10
2.	Copies of the document for obtaining NOC from the respondent # 2	A	11-13
3.	Copy of the appointment order dated 14/12/2016	B	14- 15
4.	Copies of relieving order and lien order	C	16- 17
5.	Copies of Application along with Impugned order dated 18/06/2019 by respondent # 2	D & F	18-20
6.	Copies of the Application/Appeal to respondent # 1 alongwith impugned order dated 21/11/2019	G	21- 23
7.	Attested Copies of the Service Appeal treated as Departmental representation by this Honourable Kp Service Tribunal, Peshawar and sent to the	H&I	24-

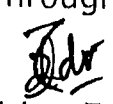
	IGP,Kpk alongwith the order dated 28/06/2022		- 32
8.	Copy of the Departmental Appeal made to the IGP, Kpk dated 20/07/2022	J	33- 35
9.	Copy of order dated 29/08/2022	K	36 -
10.	Copy of letter dated 03/04/2018 by PESCO	L	37- 39
11.	Vakalatnama	--	40

Dated: 30/09/2022

Your humble appellant


**Muhammad Shakeel
Khan**

Through counsel


Faizan Zaidi

Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2022

Muhamad Shakeel Khan son of Muhammad Ayub Khan
R/o Maqbool Abad Tehsil Paharpur & District Dera Ismail
Khan. (Ex-Constable#115 D.I.Khan.

(Appellant)

VERSUS

1. Provincial Police Officer, (IGP), Khyber Pakhtunkhwa
Central Police Office Peshawar.
2. DIG Establishment (Police) Govt, of KPK Peshawar.
3. Deputy Inspector General of Police/Regional Police Officer,
Region Dera Ismail Khan.
4. District Police Officer, Dera Ismail Khan.

..... **(RESPONDENTS)**

SERVICE APPEAL UNDER SECTION 4 OF THE KPK
SERVICES TRIBUNAL ACT, 1974, AGAINST THE
IMPUGNED ORDERS DATED 21/11/2019 PASSED
BY THE RESPONDENT NO. 1 AND AGAINST THE
IMPUGNED ORDER DATED 18/06/2019 PASSED
BY THE RESPONDENT NO. 2 WHEREBY THEY
REJECTED THE APPLICATIONS/APPEALS OF THE
APPELLANT VIDE WHICH THE APPELLANT
SOUGHT HIS
REINSTATEMENT/ABSORPTION/RETURN IN THE
RESPONDENTS DEPARTMENT BEING THE
PREVIOUS EMPLOYEE. FEELING AGGRIEVED THE
APPELLANT FILED/PREFERRED AN APPEAL ON
04/12/2019 TO THIS HONOURABLE SERVICE
TRIBUNAL WHICH WAS TREATED AS DEPARTMENT

**REPRESENTATION BY THIS HONOURABLE
SERVICE TRIBUNAL THROUGH JUDGMENT/ORDER
DATED 28/06/2022 AND SENT TO THE IGP, KPK
FOR DECIDING IT IN ACCORDANCE WITH LAW
WITHIN THREE MONTHS.**

Prayer

On acceptance of the instant appeal and by setting aside the impugned orders dated 21/11/2019 and 18/06/2019 issued by respondent # 1 & 2 respectively with the directions to the respondents to reinstate the appellant at his previous job as constable in the District Dera Ismail Khan being the eligible candidate with all back benefits.

Note: The Appellant had already filed a service appeal on 04/12/2019 in this honourable Kp, Service Tribunal Peshawar on the same issue (subject Controversy) which was by this honourable Kp, Service Tribunal Peshawar treated as Departmental representation vide Judgment/order dated 28/06/2022 and sent to the IGP, KPK for deciding it in accordance with law within three months.

Respectfully Sheweth;

1. That the appellant was initially inducted in the Police Department in the year 2006 and w.e.f 2006 to 2015 the appellant served in the Police Department as constable # 115.
2. That in the year 2015, **PESCO** announced the various posts for which the appellant applied and in this respect the appellant obtained the NOC from respondent # 2 which was duly allowed upon the application of the appellant. Copies of the documents for obtaining NOC from respondent #2 is annexed as **Annexure-A.**
3. That on 14/12/2016, the appellant was appointed as Meter Reader in PESCO after fulfilling all the codal formalities. Copy of the appointment order dated 14/12/2016 is annexed as **Annexure-B.**

4. That the respondents were pleased to relieve the services of the appellant while allowing him lien and resultantly the appellant was relieved from his services and joined PESCO. Copies of relieving order and lien order are annexed as **Annexure-C.**
5. That during the services in PESCO and in lien period, the appellant submitted an application to the respondent # 2 for his reinstatement in the services but the respondent # 2 unfortunately vide impugned order dated 18/06/2019 without communication to appellant rejected the plea of the appellant and later on this order was issued to the appellant on 19/08/2019. Copies of the application along with impugned order dated 18/06/2019 passed by respondent # 2 are annexed as **Annexure-D&F.**
6. That feeling aggrieved with the order of the respondent # 2 the appellant submitted an appeal to the respondent # 1 which also met with the same fate i.e rejection. Copies of the application to respondent # 1 along with impugned order dated 21/11/2019 passed by the respondent # 1 are annexed as **Annexure-G**
7. That feeling aggrieved with the impugned orders dated 21/11/2019 and 18/06/2019 passed by respondent # 1 & 2 respectively, the appellant filed/preferred an appeal to this Honourable Service Tribunal on 04/12/2019 which was later on by this Honourable Service Tribunal treated as Departmental Representation vide judgment/order dated 28/06/2022 and sent to the IGP, KPK with the directions/order of this Honourable Service Tribunal to decide it in accordance with law within three months. Copies of the service appeal/departmental representation & order dated 28.06.2022 are annexed as **Annexure-H & I.**
8. That the appellant also made a departmental appeal to the respondent # 1 on 20/07/2022. Copy of the departmental appeal is annexed as **Annexure-J.**
9. That the appellant was called upon by the office of the IGP, KPK through order dated 29/08/2022 for the inquiry which was attended by the appellant on date given in the order i.e

06/09/2022 at 11:00 hours in Central Police Office, Peshawar.
Copy of the order dated 29/08/2022 is annexed as **Annexure-K**.

10. That feeling aggrieved with the impugned orders dated 21/11/2019 & 18/06/2019 passed by the respondent # 1 & 2 respectively and after the lapse of three months of the directions/order made in vide order dated 28/06/2022 of this Honourable Service Tribunal to the IGP, KPK to decide the matter within three months, the same has yet very unfortunately not been decided by the respondent no 1, therefore, the appellant has no other remedy but to knock the door of this honourable forum on the following grounds.

GROUND S

- a. That it is an admitted fact that the appellant is an Ex-old employee of the Police Department who joined his service as "Constable" BPS-05 in the year 2006.
- b. That the impugned orders passed by the respondent# 1 & 2 are against law and against the norms of justice.
- c. That the respondent# 1 & 2 refused the rights of the appellant for which he was entitled for his reinstatement in services during the lien period.
- d. That the impugned orders of respondent # 1 & 2 are not sustainable in the eyes of law because the same are also against the dictum laid down by the August Supreme Court of Pakistan in case citation, **1996 SCMR 284** wherein it has categorically been directed that if any Ex employee wants his reinstatement in his previous services, he cannot be denied but respondent # 1 & 2 totally by passed the verdict of the said Judgment.
- e. That the impugned orders of the respondent #1 & 2 are not sustainable in the eyes of law and are liable to be set aside and the appellant deserves to be reinstated in the department.
- f. That the appellant requests for his reinstatement in the services on the ground that the PESCO officials were not

regularizing the services of the appellant despite the fact that appellant was a regular employee of the respondents' department and refusal on the part of PESCO by not regularizing the services of the appellant rather by directing the appellant to resign from his services resultantly the appellant had to submit the application for his reinstatement in the respondents' department but the respondents failed to consider the plea of the appellant. Copy of the letter dated 03/04/2018 is annexed as **Annexure-L.**

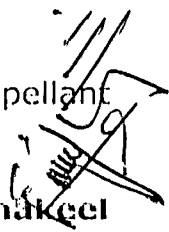
- g. That the respondent # 1 in the impugned order dated 21/11/2019 mentioned as *"it is submitted that lien was granted to the appellant for 02 years period which was applicable from 10/01/2017 to 10/01/2019 as per DPO Order Book NO. 94 dated 10/01/2019* but it is must to communicate this honourable tribunal regarding the fact that the appellant during the days of getting his lien period extended was in jail in a false and fake FIR. (Copies of FIR and Acquittal order would be provided at the time of arguments).
- h. That valuable rights of the appellant are very much involved and if the services of the appellant are not reinstated the appellant shall become unemployed and the appellant now is about 37 years of age and is not eligible for any other job in any department being over aged.
- i. That the appellant is medically fit and is able to perform his duties in respondents' department.
- j. That the appeal of the appellant is after the lapse of three months of the directions made in the judgment/order dated 28/6/2022 of this honourable tribunal to the IGP, KPK which is well within time and this forum is the only competent forum to adjudicate and hear the matter of appellant.

It is therefore, on acceptance of the instant appeal and by setting aside the impugned orders dated


21/11/2019 and 18/06/2019 issued by the respondents #1 & 2 respectively with the directions to the respondents to reinstate the appellant at his previous job as constable in the District Dera Ismail Khan being the eligible candidate with all back benefits.

Dated 30/09/2022

Your humble appellant


Muhammad Shakeel
Khan

Through counsel


Faizan Zaidi
Advocate High Court



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In service Appeal No. _____/2022

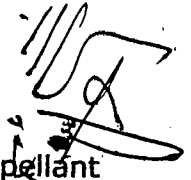
Muhammad Shakeel Khan VERSUS
(Appellant)

PPO KPK etc
(Respondents)

CERTIFICATE

Certified that appellant had filed an appeal regarding the subject controversy, earlier in this august Tribunal but the same was treated as Departmental Representation by this august Tribunal in its order dated 28/06/2022 and sent the same to the IGP, KPK to decide it in accordance with law within three months.

Dated 30/09/2022



Appellant

NOTE:

Appeal with annexures along-with required sets thereof are being presented in separate file covers.

Dated: 30/09/2022



Appellant's counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In service Appeal No. _____ /2022

Muhammad Shakeel Khan VERSUS
(Appellant)

PPO KPK etc
(Respondents)

AFFIDAVIT

I, **Muhammad Shakeel Khan**, appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following my instructions;
2. That all para-wise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.

Dated: 30/09/2022

DEPONENT

Identified By:-



Faizan Zaidi
Advocate High Court,





Deputy Inspector General
of Police & Customs
Dy: 11/1/2 /ES
Dt: 15.07.15

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

(11)
Annexur A No. 8537 /E-IV, dated Peshawar the 06/07/2015

To: The Deputy Inspector General of Police,
DIKhan Region.

Subject: APPLICATION

Memo.

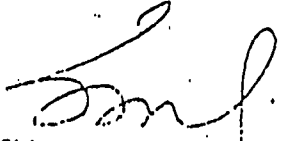
EC
P.O.
lf-2-15


Please refer to your office letter No. 2419/ES, dated 22.06.2015
on the subject noted above.

Constable Mehammiad Shakeel No. 115 of district Police DIKhan is
allowed to apply for the post of Meter Reader in PESCO Wapda.

No: 2674/ES Dtl 15-07-15

copy to DFO/DIKhan for
information with reference to this
office order no. 2420/ES Dtl 22-06-2015


(SYED FIDA HASSAN SHAH)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.


Dy Inspector General of Police
Dera Ismail Khan

اجازت نام

BETTER COPY

(11/1)



**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE, PESHAWAR**

No. 8537 /E-IV

dated Peshawar the 06 / 07/2015

To,

**The Deputy Inspector General of Police,
DIKhan Region.**

SUBJECT:- APPLICATION

Memo:

Please refer to your office letter No. 2419/ES, dated: 22-06-2015 on the subject noted above.

Constable Muhammad Shakeel No.115 of district police DIKhan us allowed to apply the post of Meter Reader in PESCO Wapa.

(SYED FIDA HASSAN SHAH)
AIG/Establishment,
For inspector General of Police,
Khyber Pakhtunkhwa
Peshawar

بیماری کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر

نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر

15/8/07

نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر
 کے ساتھ ساتھ نیشنل ایمریٹس میں سے بھی 2006 کے کوئی کوئی ممبر

Forwarded An
 [Signature]

13



From The Dy: Inspector General of Police,
DIKhan Region, DIKhan
To The Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar.

YES Dated DIKhan the

DEPARTMENTAL PERMISSION

Enclosed please find herewith an application preferred by
Constable Muhammad Shakeel, 115 of DIKhan District Police requesting therein for
grant of necessary NOC as he has qualified the test of Meter Reader in PESC
WAPDA for consideration, please.

It is also certified that above named Constable has completed
five years service in Police Department.

Encl - (1)

(Signature)
(ABDUL GHAFOOR AFRIDI)
PSP, PPM
Deputy Inspector General of Police,
Dera Ismail Khan Region

No. YES

Copy of above is forwarded to District Police Officer, DIKhan
for information with reference to his office memo: No. 1533/EC dated 17.06.2015.

(ABDUL GHAFOOR AFRIDI)
PSP, PPM
Deputy Inspector General of Police,
Dera Ismail Khan Region

PESHAWAR ELECTRIC SUPPLY COMPANY

Wapda House, Shami Road Peshawar - Pakistan
Phone No: +92,91,921997 Fax No: +92,91,9212335
Website: www.pesco.gov.pk Email: dgh@pesco.gov.pk

No. 2346-49 /HR/PESCO Rec-2015/16

Dated 14/12/2016

Mr. Muhammad Shaghl Khan S/O. Muhammad Ayub Khan
C/O. Manzil Arins, Decker, Panyala Road, Baharpur, Dera Ismail Khan
Contact: 03162887000

Subject: EMPLOYMENT IN PESCO AS METER READER UPS-07 ONLY FOR ONE YEAR CONTRACT

You are hereby informed that you have provisionally been appointed as Meter Reader (UPS-07) in PESCO on contract basis on the following Terms & Conditions:

1. Pay at Rs. 2,220/- Per Month in the Base Pay Scale (No. 07 (9,320) - 510 - 24,000).
2. Initial contract period will be one year, extendable by another period subject to satisfactory performance.
3. The service rendered under the present contract shall not qualify for Pension / Gratuity and will not entitle you for regular employment.
4. You will be governed by Leave Rules contained in the Pakistan WAPDA Leave Rules for WAPDA Employees, 1982. However, provisions contained in Rules-9 (b), 11, 12, 13, 14, 17, 19, 20 (in so far as leave under Rule-9 (b) is concerned), 20(A) shall not apply.
5. You will be allowed allowances including House Rent Allowance as admissible to other employees of the WAPDA/PEPCO/PESCO from time to time.
6. Traveling Allowance for journeys as admissible under the WAPDA Traveling Allowance Rules, as amended from time to time, to Regular Employees of the corresponding Pay Scale shall be admissible to you.
7. Medical Facilities as admissible under the WAPDA Medical Attendance Rules-1979 as amended from time to time.
8. In respect of other matters, not specified in this letter, you will be governed by the Rules / Regulations as applicable to PESCO/WAPDA Employees.
9. You will be governed under The Pakistan Wapda Employees (Efficiency and Discipline) Rules, 1978 adopted by WAPDA/PEPCO/PESCO or any other such rules as adopted/framed by WAPDA/PEPCO/PESCO from time to time as amended from time to time.
10. You will not be entitled to contribute towards Wapda Employee's General Provident Fund nor you will be entitled to become member of contributory Wapda Employees Provident Fund nor you will be entitled to any benefit of Wapda Employee General Provident Fund Rules -1985.
11. You will not have pay Seniority and will not be placed on Regular Seniority List of the Cadre in which the post for time being held by you is included.
12. Your whole time will be at the disposal of the PESCO/WAPDA. You may be employed in any manner required by appropriate authority without claim for extra remuneration. You will devote your whole time to the PESCO/WAPDA's business and at all times obey the rules prescribed for the time being for the regulation of service in the post in which you have been employed. You will be liable to work on when within or outside Pakistan in any post under PESCO/WAPDA or Company or Federal Government or Provincial Government or a body or Corporation set up established by the authority.
13. The appointment on contract shall be liable to termination on One Month's Notice or payment of one month's pay in lieu thereof by either side without assigning any reason. However, your services can be terminated without any notice if you are found guilty of dishonesty, misconduct, negligence, indiscipline or breach of trust.

محمد شگل خان



PESHAWAR ELECTRIC SUPPLY COMPANY

Wapda House Shami Road Peshawar - Pakistan
Phone No. +9291921997 Fax No.+92 91 9212335
Website: www.pesco.gov.pk Email: dghrpesco@gmail.com

No. 2346-49 /HR Pesco Rec 2015-16

Dated: 14 / 12 / 2016

Mr. Muhammad Shakil Khan S/o Muhammad Ayub Khan
C/o Marwat Arms Dealer Panyala Road Paharpur D.I.Khan
Contact # 03467887000

**SUBJECT:- EMPLOYMENT IN PESCO AS METER READER BPS-07 ONLY
FOR ONE YEAR CONTRACT**

You are hereby informed that you have provisionally been appointed as **Meter Reader (BPS-07)** in PESCO on contract basis on the following Terms & Conditions.

1. Pay at Rs.2220/- Per Month in the Basic pay scale No.07 (9,220-510-24599/-
2. Initial contract period will be one year, extendable by another period subject to satisfactory performance.
3. The service rendered under the present contract shall not qualify for pension / Gratuity and will not entitle you for regular employment.
4. Your will be governed by leave Rules contained in the Pakistan WAPDA Leave Rules for WAPDA Employee, 1982. However, provisions contained in Rules 9 (b) 11, 12, 13, 14, 17, 19, 20 (in so far as leave under Rule (b) is concerned), 20(A) shall not apply.
5. You will be allowed allowance including House Rent Allowance as admissible to other employees of the WAPDA/PEPCO/ PESCO from time to time.
6. Traveling Allowance for journeys as admissible under the WAPDA Travelling, Allowance Rules, as amended from time to time, to Regular Employees for the corresponding Pay Scale shall be admissible.
7. Medical Facilities as admissible under the WAPDA Medical Attendance Rules 1979 as amended from time to time.
8. In respect of other matters, not specified in the letter you will be governed by the Rules / Regulations as applicable to PESCO / WAPDA employees.
9. You will be governed under the Pakistan WAPDA Employees (Efficiency and Discipline) Rules, 1978 adopted by WAPDA / PEPCO/ PESCO or any other such rules as adopted / framed


(15)



14. In case you resign or leave the service at any time before completion, you shall defray to the PESCO/WAPDA the sum of Rs. 50,000/- (Rs. Fifty thousand) as liquidated damages, in addition to the salary received during training and boarding if any borne by PESCO/WAPDA. You will produce affidavit on non-judicial stamp paper of the value of Rupees 100/- to this effect. (www.pesco.gov.pk)
15. You will make a declaration, in writing, of all moveable and immovable properties, shares, certificates, insurance policies, cash and jewellery of the value of Rs. 50,000/- belonging to or held by you or by a member of your family individually or collectively, in the Pakistan WAPDA Employees' Contract Rules-1978, within one month of joining into service. The members of family according to the Pakistan WAPDA Employees' Rules, 1978 are as under:
 - a. Your wife/wives, real/step children, residing with the employee and wholly dependent on you.
 - b. Any other relations of the employee when residing and wholly dependent upon you.
16. You should before reporting to this office, produce a certificate of Medical Fitness from the Medical Superintendent, WAPDA Hospital Peshawar. If Medical Superintendent, WAPDA Hospital Peshawar refers you to a Specialist for opinion or if you are required to obtain any X-Ray/ECG or Electro Cardiogram, the cost of such consultation/service/test etc. will be borne by you.
17. You will not divulge, either directly or indirectly, to any person any knowledge or information of a confidential nature which you may acquire concerning the affairs, property, enterprise and undertaking of the PESCO/WAPDA during the course of your service.
18. You will be required to furnish an oath (Hath Namah) in writing in the form presented by you for the purpose.
19. You will be required to acquaint yourself with the process of phone billing in the Company. Your contract will further be extended subject to achievement of progress / goals set by the Company.
20. You may be posted anywhere in PESCO jurisdiction. You are expected to furnish an undertaking on non-judicial stamp paper value of Rs. 50/- to the effect that you will not approach to any political figure / personality nor you will exert any pressure for your transfer / posting in your initial period of 3 years, if your contract is extended.
21. This offer of appointment is provisional and subject to
 - a. Medical fitness.
 - b. Confirmation / verification of your educational certificates / degrees and other requisite formalities.
 - c. In case these documents are found forged/bogus/incorrect at belated stage, your services shall stand terminated from the date of joining. You will be liable for legal action. Legal action will be initiated against you under the relevant laws. Undertaking in this regard is required to be furnished on non-judicial stamp paper (Rs.50) as per proforma (available on www.pesco.gov.pk) duly attested by Notary Public with your arrival report.
 - d. You will not be paid any salary till the time your verified documents are received.

If the above terms & conditions of appointment are acceptable to you, please send your written acceptance in person to the office of undersigned on 26/12/2016

This issues with the approval of Chief Executive Officer, PESCO Peshawar


 Manager (HRM)
 PESCO Peshawar

Copy to:

1. Finance Director PESCO HQ
2. Medical Supdt: WAPDA Hospital Peshawar
3. Circulation File

by WAPDA/PEPCO / PESCO from to time as amended from time to time.

10. You will not be entitled to contribute towards WAPDA Employee's General Provident Fund not you will be entitled to become member of contributory WAPDA Employees
11. You will not have any Seniority and will not be placed on Regular Seniority List of the Cadre in which the post for time being held by you is included.
12. Your whole time will be at the disposal of the PESCO / WAPDA. You may be employed in any manner required by appropriate authority without claim for extra recommendation. You will devote your whole time to the PESCO / WAPDA's business and at all time obey the rules prescribed for the time being for the regulation of service in the post to which you have been employed you will be liable to active anywhere within or whole Pakistan in any post under PESCO/WAPDA or company of Federal Government or Provincial Government or A corporation set up established by the authority.
13. The appointment on contract shall be liable to termination on one month 's Notice or payment of one month's pay in lieu thereof either side without assigning any reason. However you services can be terminated without any notice if you are found guilty of dishonesty. Misconduct.
14. In case you resign or leave the service at any time before completion you shall defray to the PESCO/WAPDA the such of Rs.50,000/- Rs. As liquidated damages, in addition to the salary received during training and boarding if any borne by PESCO / WAPDA. You will produce as such on non-judicial stamp paper of the value of Rupees 100/- to this effect by www.pesco.gov.pk).
15. You will make a declaration m writing of all movable and immovable property shares, certificate, insurance policies, cash and jewellery of the value of Rs.50,000/- into service. The members of family according to the Pakistan WAPDA Employee rules, 1978 are as under.
 - a. Your wife/wives. Real / step children, residing with the employee and wholly depended you.
 - b. Any other relations of the employee when residing and wholly depended upon you.
16. You should before reporting to the office, produce a certificate of Medical fitness from the Medical Superintendent, WAPDA Hospital Peshawar, If Medical Superintendent, WAPDA Hospital Peshawar refers to a Specialist for opinion or if you are retired to obtain any & pay / test or Electro Cardiogtain, the cost of such consultation / service/test etc. will be borne by your.

17. You will be divulge, either or indirectly, to any person any knowledge information or a confidential nature which you may acquire concerning the affairs. Property, enterprise and undertaking of the PESCO / WAPDA during the course of your service.
18. You will be required to furnish an oath (Half Nama) in writing in the form prayed by for all purpose.
19. You will be required to acquaint yourself with the process of photo billing in the Company. Your contract will further be extended subject to achievement of progress / goals set by the company
20. You may be posted anywhere in PESCO jurisdictions. You are connect in furnish are undertaking on non-judicial stamp paper value of Rs. 50/- to the effect the you will not approach in any political figure/ personality nor you will exert any pressure for your transfer posting in your initial period of 3 years if your contract is extended.
21. This offer of appointment is provisional and subject to
 - a. Medical fitness.
 - b. Confirmation / verification of your educational certificate / degree and other requisite formalities.
 - c. In case these documents are found forge/ bogus/ incorrect at heated stage, your service shall stand terminated from the date of jointly service conduct any notice. Legal action will be initiated against you under the relevant leave. Undertaking in this regard is required to be furnish on non-judicial stamp paper Rs.50/- as performance (available on www.pesco.gov.pk) duly attested by Notary Public with your arrival report.
 - d. You will not be paid any salary till the time your verified documents are received

If the above terms & conditions of appointment are acceptable to you please send your written acceptance in person to the office of undersigned on 26.12.2016

This issued with the approval of chief Executive Officer, PESCO Peshawar.

**Manager (HRM)
PESCO Peshawar**

Copy

1. Finance Director PESCO HQ
2. Medical Supdt: WAPDA Hospital Peshawar.
3. Circulation File.

16

Annexure "C"

11

12

ORDER

Constable Mohammad Shakeel No.115 of this District Police Dikhan has applied for the post of Meter Reader in PESCO WAPDA vide CPO letter No.8537/E-IV, dated: 06.07.2015. In the mean while he was charged in criminal case vide FIR No.300, dated: 15.10.2016 w/s 302/34-PPC PS/Paharpur Dikhan and departmental proceeding initiated against him. He was placed under suspension.

Now he has applied to be relieved to join the new place of posting in PESCO WAPDA.

The perusal of record shows that in the FIR unknown accused were charged with muffled faces but later on eye witness Manzur Hussain charged the applicant alongwith his uncle for the occurrence. It further reveals that the said eye witness submitted his statement on affidavit on the basis of which Honourable High Court released the applicant on bail.

In view of above, the disposal of departmental enquiry at this stage may cause injustice, therefore, the same may be kept pending. However, the applicant re-instated in service and allowed to be relieved to join at new place of posting.

In case of conviction in Criminal Case the papers will be sent to the PESCO Department for necessary departmental action against the applicant Mohammad Shakeel No.115.

[Handwritten Signature]
District Police Officer
Dera Ismail Khan

[Handwritten Signature]

CB 94
10-1-17

CO

[Handwritten Signature]

11/11/2017

BETTER COPY

(16/1)

ORDER

Constable Mohammad Shakeel No.115 of this District Police D.I.Khan has applied for the post of Meter Reader in PESCO WAPDA vide CPO letter No.8537/E-IV dated: 06/07/2015. In the mean while he was charged in criminal case vide FIR No.300, dated: 15-10-2016 u/s 302/34-PPC PS/Paharpur DIKhan and departmental proceeding initiated against him. He was placed under suspension.

Now he has applied to be relieved to join the new place of posting in PESCO. WAPDA.

The perusal of records shows that in the FIR un-known accused were charged with muffled faces but later on eye witness Manzar Hussain charged the applicant alongwith his uncle for the occurrence. It further reveals that the said eye witness submitted his statement on affidavit on the basis of which Honourable High Court released the applicant on bail.

In view of above, the same may be kept pending. However, the applicant re-installed in service and allowed to be relieved to join at new place of posting.

In case of conviction in Criminal Case the papers will be sent to the PESCO Department for necessary departmental action against the applicant Mohammad Shakeel No.115.

**District Police Officer
Dera Ismail Khan**



... Police Officer at ...
 ... dated 06.07.2016 ...
 ... application now he has been ordered to be appointed as Meter
 reader in PESCO and has requested to be relieved by maintaining lien
 in the meanwhile applicant was involved/charged in a criminal case vide
 Case FIR No. 300, dated 15.10.2016 u/s 302/34 PPC registered at
 PS/Paharpur and Departmental proceedings initiated.

The perusal of papers transpires that in FIR unknown accused with
 muffled faces were charged later on statement u/s 164 CrPC of eye
 witness namely Manzil Hussain recorded in which he also charged the
 applicant. However, the witness affidavit was produced before the
 Hon'ble High Court, which released the applicant on bail vide order
 dated 24.11.2016.

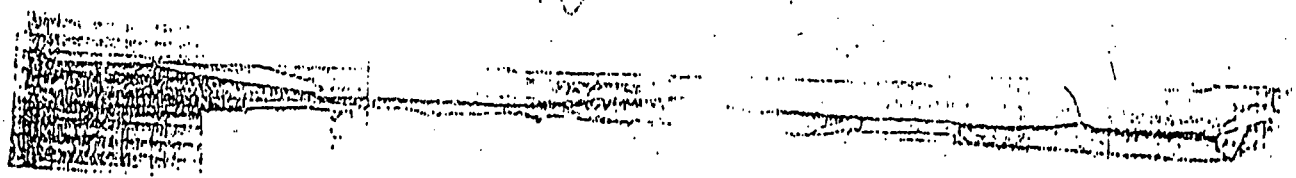
Now the enquiry has been concluded and applicant held guilty.
 In view of the above situation/facts, the departmental enquiry may not
 be disposed off at this stage. Moreover, the applicant may not be
 refused to be relieved for new appointment.

In the circumstances, the enquiry paper may be kept pending till the
 decision of Criminal Case and applicant relieved to report at new place
 of posting i.e. PESCO. In case, the criminal case is decided against
 applicant, the papers may be sent to the PESCO for departmental action
 against him, if approved please

Comments
22/11/17

by: Superintendent of Police,
 Deptt. Dera Ismail Khan
 27.11.17

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BETTER COPY

(17/)

Reference attached application of constable Muhammad Shakeel No. 115 DIKhan.

The application was allowed to apply for the post of Meter Reader in PESCO WAPDA vide CPO letter No. 8537/E41V dated: 06-07-2015. That as per application now he has been order to be appointee as a meter reader in PESCO and his requested to be relieved by maintaining lien.

In the meanwhile applicant was involved / charged in criminal case vide case FIR No.300 dated: 15-10-2016 U/S 302 u/s 34 PPC registered at PS / Paharpur and departmental proceedings initiated.

The perusal of paper transpires that in FIR unknown accused with mulled faces were charged letter on statement u/s 164 GPC of I witness namely Manzar Hussain recorded in which he also charged the applicant. However, the witness affidavit was produced before the Honourable High Court, which released the applicant on bail vide order dated: 24-11-2016.

Know the inquiry has been concluded and applicant held guilty.

In view of the above situations / facts, the departmental inquiry may not be disposed off at this stage. Moreover the applicant may not be refused to be relieved for new appointment.

In the circumstances, the inquiry paper maybe kept pending till the decision of criminal case and applicant relieved to report at new placed of posting i.e. PESCO in case, the criminal case in decided against applicant, the papers maybe sent to the PESCO for departmental action against him, if approved please.

**Dy: superintendent of police
Legal Dera Ismail Khan**



18

OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

20/06/2019
20/06/2019

Annexure "D and F"

No. 3034 /ES, Dated DI-Khan the 18/06/2019

To The District Police Officer,
DI Khan.

Subject APPLICATION

In reference to your office memo, No. 1822/FC dated 10.06.2019

The competent authority has issued the following remarks on your office letter under reference:-

"Regretted"

The applicant may be informed accordingly.

C.H.C.
In favour of
[Signature]
[Signature]
District Police Officer
Dera Ismail Khan

[Signature]
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

607
[Handwritten notes and stamps]
30-07-2019
19/06/2019

BETTER COPY

18/1



**OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION**

No. 3034 /ES,

Dated DIKhan the 18/6/2019

To,

**The District Police Officer,
D.I.Khan**

SUBJECT:- APPLICATION

Reference your office memo No.1822/EC dated: 10-04-2019.

The competent authority has passed the following remarks
on your office letter under reference:-

Regretted

The applicant may be informed accordingly.

**Regional Police Officer
Dera Ismail Khan**

بخدمت جناب ریجنل پولیس آفیسر ڈیرہ اسماعیل خان

جناب عالی!

مؤید بائہ گزارش ہے من سائل مورخہ 31.5.2006 کو محکمہ پولیس میں بھندہ کنسٹیبل بھرتی ہوا اور محکمہ پولیس میں تقریباً دس سال سے زائد عرصہ احسن طریقہ سے اپنی ڈیوٹی ہر انجام دیتا رہا۔ اور پھر محکمہ پولیس سے باقاعدہ طور پر NOC بحوالہ لیٹر نمبر 8537/EV مورخہ 06.7.15 جاریہ جناب G.P صاحب خیر پختہ خواہ سے حاصل کی گئی۔ پیسکو (داپڑہ) میں پیسٹر ریڈر پوسٹ پر اٹلائی گیا۔ NTS ٹیسٹ پاس کیا اور محکمہ پیسکو (داپڑہ) میں بحوالہ آرڈر لیٹر نمبر 14.12.2016 بطور پیسٹر ریڈر بھرتی ہوا۔

2346-49/HR مورخہ 14.12.2016 بطور پیسٹر ریڈر بھرتی ہوا۔

یہ کہ محکمہ داپڑہ سے آرڈر موصول ہونے پر من سائل نے باقاعدہ طور پر جناب DPO صاحب داپڑہ کو Lien پیسٹر ریڈر پر محکمہ پولیس سے روانگی اور محکمہ پیسکو میں حاضری کی اجازت کے سلسلہ میں درخواست گزاری۔

یہ کہ گزاری گئی درخواست پر جناب DPO صاحب نے بحوالہ آرڈر بک نمبر 94 مورخہ 0.1.17 سے بعد روانگی

سائل کو جانے کی تکلیف اجازت مرحمت فرمائی، جس کے بعد سائل نے نکالنے کا اہلکار ہوا اور وہاں پہنچ کر اسے

کی اور اپنا سرورس ریڈر بنا دیا۔ جب کہ محکمہ پیسکو (داپڑہ) سے وہاں دفتر میں باقاعدہ طور پر حاضری کی اور تمام کاغذات جمع کرائے

یہ کہ سائل کو ایک سال کنٹریکٹ پر پیڈ ہر بھرتی کیا گیا تھا اور بعد میں ایک سال کنٹریکٹ پر پیڈ ہوا ہے اور

یہ یقین دہانی کرائی گئی تھی کہ دو سال کا عرصہ گزرتے ہی سابقہ ملازمت کو شامل کر کے محکمہ پیسکو میں مستقل کر دیا جائے گا۔

اب دو سال گزرنے کے بعد پھر ایک سال کے کنٹریکٹ بڑھانے کے لئے کاغذات طلب کر لئے ہیں، اگر سائل اس

کنٹریکٹ پر پیڈ محکمہ پیسکو میں رہتا ہے تو سائل کا Lien پر پید ختم ہو جانے کا احتمال ہے۔

یہ کہ عرصہ دو سال گزارنے کے باوجود سائل کو محکمہ پیسکو داپڑہ میں مستقل نہیں کیا گیا جو کہ سائل کے

سراسر انصافی اور حق تلفی ہے۔

یہ کہ سائل محکمہ پولیس میں مستقل ملازم تھا اور دس سال سے زائد عرصہ سرورس کر چکا تھا۔ سائل اپنے پانچ

سے باقاعدہ NOC ولین پر پید حاصل کرنے کے بعد محکمہ پولیس سے محکمہ داپڑہ کو گیا تھا اور اب تک مستقل نہ ہونے کی

سائل اپنے بھرتی محکمہ پولیس میں واپس آنا چاہتا ہے تاکہ سائل کو اپنے جائز حقوق اور ولین سرورس حاصل ہو جائے۔

(25)


(10)

جناب دللا
سائل ایک لریب فیملی ہے تعلق رکھتا ہے اور سائل پر اپنے والدین اور فیملی کی کفالت کا بوجھ ہے اسی وجہ سے
سائل محکمہ پولیس میں واپس آنا چاہتا ہے کہ سائل کو مستقل ملازمت کی وجہ سے ذہنی آسودگی میسر آجائے کیونکہ کنٹریکٹ ملازمت
کی وجہ سے سائل اور سائل کی فیملی ذہنی کوفت میں مبتلا ہے سائل کی طویل اور بہترین ملازمت اور Lein پر پیکوڈ نظر رکھتے ہر
سائل کو دوبارہ محکمہ پولیس میں باقاعدہ طور پر حاضر کر کے کی اجازت مرمت فرمائی جاوے
سائل تازیسٹ دغا گور ہے گا۔

نفاذ مورخہ :- 23.03.2019

العارض

سابقہ کنسٹیبل محمد شکیل نمبر 115 محکمہ پولیس ڈیرہ اسماعیل خان



گزارش ہے کہ من سائل مورخہ 31-05-2006 کو ٹکٹہ پولیس میں بچہ کا نشیبل بھرتی ہوا اور ٹکٹہ پولیس میں تقریباً دس
مہینہ حسن طریقہ سے اپنی ڈیوٹی سرانجام دیتا رہا۔ اور پھر ٹکٹہ پولیس سے باقاعدہ طور پر NOC بحوالہ لیٹر نمبر 8537/EV
06-07-2016 جاریہ جناب GP صاحب خیر پختہ خواہ سے مسائل کی ٹکٹہ پیکو (واپڈہ) میں میٹر ریڈر پوسٹ پر اپلائی کیا۔
06-07-2016 میں بحوالہ آرڈر لیٹر نمبر 2346-49/HR مورخہ 14-12-2016 بطور میٹر ریڈر بھرتی ہوا۔
لیٹریٹ ڈاؤنڈہ سے آرڈر موصول ہونے پر من سائل نے باقاعدہ طور پر جناب DPO صاحب ذریعہ کو Lien پیرٹیڈ پیکو پولیس سے

ٹکٹہ پیکو میں حاضری کی اجازت کے سلسلہ میں درخواست گزار کی۔
کہ گزاری گئی درخواست پر جناب DPO صاحب نے بحوالہ آرڈر نمبر 94 مورخہ 10-01-2017 من سائل کو جانے کی
مرمت فرمائی جس کے بعد سائل نے ٹکٹہ سے باقاعدہ طور پر پکیرنس حاصل کرنے کے بعد روانگی کی۔ اور اپنا سروس ریکارڈ لے جا کر ٹکٹہ

یہ کہ سائل کو ایک سال کنٹریکٹ پر پڑ پر بھرتی کیا گیا تھا اور بعد میں ایک سال کنٹریکٹ پر پڑ بڑھاتے ہوئے یہ یقین دہانی کرائی گئی تھی
کہ دو سال کا عرصہ گزرتے ہی سابقہ ملازمت کو شامل کر کے ٹکٹہ پیکو میں مستقل کر دیا جائے گا لیکن اب دو سال گزرنے کے بعد پھر ایک سال
کنٹریکٹ بڑھانے کے لئے کاغذات طلب کرتے ہیں اگر سائل اب پھر کنٹریکٹ پر پڑ پر ٹکٹہ پیکو میں رہتا ہے تو سائل کو Lien پر پڑ تم ہو
جانے کا احتمال ہے۔ یہ کہ عرصہ دو سال گزرنے کے باوجود سائل کو ٹکٹہ پیکو (واپڈہ) میں مستقل نہیں کیا گیا جو کہ سائل کے ساتھ سراسر نا انصافی
اور حق تلفی ہے۔

چونکہ سائل نے مورخہ 01-03-2019 جناب DIG ذریعہ اسماعیل خان کو واپسی کیلئے درخواست گڑا رکھی۔ جناب DIG صاحب
نے ہنرت کے ساتھ منسوخ کر دی۔
جو کہ آرڈر کاپی ہمراہ لف ہے۔ یہ کہ سائل ٹکٹہ پولیس میں مستقل باوجود سائل سے زائد عرصہ سروس کر چکا تھا سائل اپنے بھرتی ٹکٹہ سے

باتقائدہ NOC لین پر یہ مسائل کمر بننے سے بعد منگوا جائے گا اور یہ نتائج مستقل نہ ہونے کی وجہ سے مسائل اپنے بھرتی محکمہ پولیس میں واپس

آنا چاہتا ہے تاکہ مسائل کو اپنے جائز حقوق اور طویل سروس حاصل ہو جائے۔

جناب والا!

مسائل ایک ٹریب ٹیبل سے تعلق رکھتا ہے اور مسائل پر اپنے والدین اور فیملی کی حالت کا یہ بھی ہے انہی وجہ سے مسائل محکمہ پولیس میں واپس آنا چاہتا ہے کہ مسائل کو مستقل ملازمت کی وجہ سے ڈی آسودگی میں آجائے کیونکہ کنٹریکٹ ملازمت کی وجہ سے مسائل اور مسائل کی پیشی ڈی کوفٹ میں بنتا ہے۔ مسائل کی طویل اور بہترین ملازمت اور Lien پر یہ کو مد نظر رکھتے ہوئے مسائل کو دوبارہ محکمہ پولیس میں باقاعدہ طور پر حاضری کرنے کی اجازت مرحمت فرمائی جاوے۔

سید مورخہ: 29-08-2019

العارض

مسائل سابقہ کانسٹیبل محمد شکیل نمبر 115 منگوا پولیس ڈیرہ اسماعیل خان

0346-7997000

(23)

No. 11583 /F-IV dated Peshawar the 21 / 11 /2019

The Regional Police Officer,
DIKhan.

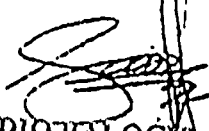
Subject: APPLICATION FOR RE-JOINING TO POLICE DEPARTMENT

Memo

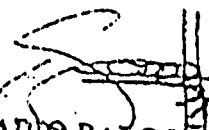
Ex-Constable Muhammad Shakeel No. 115 of District Police DIKhan has submitted an application stating therein that he was enlisted in Police Department on 31.05.2005 and thereafter he applied for the post of Meter Reader in WAPDA Department through proper channel and on selection / appointment he joined the said department on 10.01.2017. Now he has requested for his rejoining back Police Department.

It is submitted that lien was granted to him for 02 years period which was applicable from 10.01.2017 to 10.01.2019 as per DPO Order Book No. 94 dated 10.01.2019. From 10.01.2019, he did not apply for extension of lien which is his fault.

Meaning thereby, his lien stood finished on 10.01.2019 from Police Department. Under such circumstances, his instant request is not maintainable so it is filed.

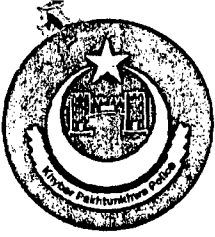

(SADIQ BALOCH) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
21.11.2019

No. 11583 /F-IV dated Peshawar the 21 / 11 /2019
Copy of above is forwarded for information to Manager HRM
Peshawar with his office letter No. 2346-49/HR/PESCO, dated 14.12.2016.


(SADIQ BALOCH) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

BETTER COPY

23/1



**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
CENTRAL POLICE OFFICE,
KHYBER PAKHTUNKHWA, PESHAWAR**

No. 11582 /E-IV dated Peshawar the 21/11/2019

To,

**The Regional Police Officer
Dera Ismail Khan**

SUBJECT: APPLICATION FOR RE-JOINING TO POLICE DEPARTMENT.

Memo:

Ex- Constable Muhammad Shakeel No.115 of District Police DIKhan, has submitted an application stating therein that he was enlisted in police department on 31-05-2006 and thereafter he applied for the post of Metter Reader in WAPDA department through paper channel and on selection / appointment he joined the said department on 10-01-2017. Now he has requested for his re-joining back police department.

It is submitted that lien was granted to him for 02 years period which was applicable from 10-01-2017 to 10-01-2019 das per DPO order book No.94 dated: 10-01-2019 from 10-01-2019 he did not applied for extension of lien which is fault.

Meaning thereby, his lien stood finish on 10-01-2019 from police department under such circumstances, his instant request his not maintainable so it his filled.

**(SADIQ BALOCH) PSP
AIG/Establishment
For inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
21-11-2019**

No. 11583 / F-IV dated Peshawar the 21/11/2019

Copy of above is forwarded for information to Manager HRM department in his office letter No.2346-49/HR/PESCO, Dated: 14.12.2016.

**(SADIQ BALOCH) PSP
AIG/Establishment
For inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
21-11-2019**

29

Service Appeal No.1637/2019 titled "Muhammad Shakeel vs. Provincial Police Officer and others", decided on 28.06.2022 by Division Bench comprising Kalim Arshad Khan, Chairman, and Mian Muhammad, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Camp Court Dera Ismail Khan.

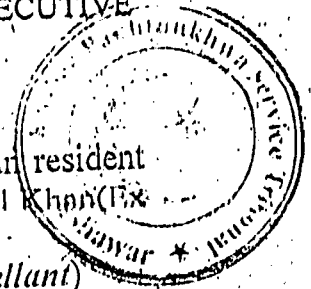
Annexure "H and I"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

BEFORE: KALIM ARSHAD KHAN ... CHAIRMAN
MIAN MUHAMMAD ... MEMBER EXECUTIVE

Service Appeal No.1637/2019

Muhammad Shakeel Khan, son of Muhammad Ayub Khan, resident of village Maqbool Abad Tehsil Pahnapur District Dera Ismail Khan (P.S. Constable No.115 D.I.Khan).....(Appellant)



Versus

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
 2. Deputy Inspector General of Police (Establishment), Khyber Pakhtunkhwa, Peshawar.
 3. Regional Police Officer, Dera Ismail Khan.
 4. District Police Officer, Dera Ismail Khan.
-(Respondents)

Present:

Mr. Muhammad Waseem Ullah Awan,
Advocate.....For appellant.

Mr. Muhammad Adeel Butt,
Additional Advocate General

Mr. Farhaj Sikandar,
District Attorney.....For respondents.

Date of Institution.....04.12.2019
 Dates of Hearing.....28.06.2022
 Date of Decision.....28.06.2022

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDERS DATED 21.11.2019 PASSED BY RESPONDENT NO.1 AND ORDER DATED 18.06.2019 PASSED BY RESPONDENT NO.2 WHEREBY THEY REJECTED THE DEPARTMENTAL REPRESENTATION/APPEAL OF THE APPELLANT FOR HIS REINSTATEMENT/ ABSORPTION/ RETURN IN THE RESPONDENTS DEPARTMENT BEING THE PREVIOUS EMPLOYEE.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

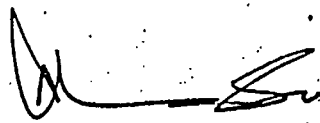
25

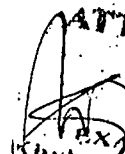
Service Appeal No.1637/2019 titled "Muhammad Shakaal, vs. Provincial Police Officer and others", decided on 28.06.2022 by Division Bench comprising Kalim Arshad Khan Chairman, and Mian Muhammad, Member, Executive, Khyber Pakhtunkhwa Service Tribunal, Camp Court Dera Ismail Khan.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN. According to the averments made in the appeal are that the appellant was initially appointed in the Police Department in the year 2006 and w.e.f 2006 to 2015 the appellant served in the department as Constable; that in 2015, PESCO announced various posts for which the appellant applied and in this respect the appellant obtained NOC from respondent No.2 which was duly allowed upon the application of the appellant; that on 14.12.2016, the appellant was appointed as Meter Reader in PESCO after fulfilling all the codal formalities; that the respondents were pleased to relieve the appellant while allowing him lien and resultantly the appellant was relieved from his services and joined PESCO; that during the services in PESCO and in lien period, the appellant submitted an application to the respondent No.2 for his reinstatement in police services but respondent No.2 unfortunately vide impugned order dated 18.06.2019 without communication to appellant rejected plea of the appellant and later on this order was issued to the appellant on 19.08.2019; that feeling aggrieved, the appellant filed departmental representation which was rejected, hence, this appeal.

2. On receipt of the appeal and its admission to full hearing, the respondents were summoned, who on putting appearance contested the appeal by filing written reply raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellant.


29/6/22

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

- 3. We have heard learned counsel for the appellant and learned Additional Advocate General for the respondents.
- 4. Learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned AAG controverted the same by supporting the impugned order(s).
- 5. According to the impugned order dated 21.11.2019, the department had granted lien to the appellant for a period of two years from 10.01.2017 to 10.01.2019 as per DPO order book No. 94 dated 10.01.2019. It was further stated that from 10.01.2019 the appellant did not apply for extension in lien, period which was his fault and thus his lien ended on 10.01.2019 from the Police Department and, therefore, his request was not held maintainable and was accordingly filed. Instead of preferring departmental representation against the impugned order dated 21.11.2019, the appellant has preferred this appeal before this Tribunal on 04.12.2019 that is within thirty days of the impugned order. Filing of departmental appeal against an impugned order before the next higher forum is not only the requirement of Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 but also a step towards filing appeal before the Tribunal. The appellant has not filed departmental appeal within thirty days of the impugned order as required under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 and has rather preferred this appeal within thirty days of the impugned order, therefore, while deriving wisdom from the judgment of august Supreme Court of Pakistan reported as PLD 1994 Supreme

[Handwritten signature]
28/06/22

ATTESTED
[Signature]
CHAIRMAN
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

27

Service Appeal No. 1637/2019 titled "Muhammad Shakeel vs. Provincial Police Officer and others", decided on 28.06.2022 by Division Bench comprising Kalim Arshad Khan, Chairman, and Mian Muhammad Ateem Executive, Khyber Pakhtunkhwa Service Tribunal, Camp Court Dera Ismail Khan.

Court 539 "titled Muhammad Anees and others-vs- Abdul Haseeb and others" and 2017 SCMR 56 "titled Muhammad Akram-vs-DCO Rahim Yar Khan and others" we treat the instant appeal as departmental representation and send it to the IGP, Khyber Pakhtunkhwa to decide it in accordance with law within three months from receipt of this judgment. Consign.

6. Pronounced in open Court at Dera Ismail Khan and given under our hands and the seal of the Tribunal on this 28th day of June, 2022.



SD/
KALIM ARSHAD KHAN
Chairman
Camp court D.I.Khan

Certified to be true copy

EX. MEMBER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

SD/
MIAN MUHAMMAD
Member Executive
Camp court D.I.Khan

Date of Presentation of Application 18-7-22
Number of Words 1600
Copying Fee 18/-
Urgent 4/-
Total 22/-
Name of Copyist _____
Date of Completion of Copy 18-7-22
Date of Delivery of Copy 18-7-22



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



Service Appeal No. 1637 /2019

Muhammad Shakeel Khan son of Muhammad Ayub Khan
R/o Maqbool Abad Tehsil Paharpur & District Dera Ismail
Khan. (Ex- Constable#115 D I Khan).

(Appellant)

VERSUS

1. Provincial Police Officer Govt. of KPK Peshawar. Diary No. 1768
2. DIG Establishment (Police) Govt. of KPK Peshawar. Dated 24/12/19
3. Regional Police Officer, Dera Ismail Khan.
4. District Police Officer, Dera Ismail Khan.

(RESPONDENTS)

SERVICE APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDERS DATED 21/11/2019 PASSED BY THE RESPONDENT NO. 1 AND AGAINST THE IMPUGNED ORDER DATED 18/06/2019 PASSED BY RESPONDENT NO. 2 WHEREBY THEY REJECTED THE APPEALS/DEPARTMENTAL REPRESENTATIONS OF THE APPELLANT VIDE WHICH THE APPELLANT SOUGHT FOR HIS REINSTATEMENT/ABSORPTION/RETURN IN THE RESPONDENTS DEPARTMENT BEING THE PREVIOUS EMPLOYEE.

Prayer:

Filed on day

Registrar

4/12/19

On acceptance of the instant appeal and by setting aside the impugned orders dated 21/11/2019 and 18/06/2019 issued by respondents#1 & 2 respectively with the directions to the respondents to reinstate the petitioner at his previous job as Constable in the

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



District Dera Ismail Khan being the eligible candidate with all back benefits.

Respectfully Showeth;

1. That the appellant was initially inducted in the police department in year 2006 and w.e.f 2006 to 2015 the appellant served in the police Department as Constable#115.
2. That in year 2015, PESCO announced the various posts for which the appellant applied and in this respect the appellant obtained the NOC from respondent#2 which was duly allowed upon the application of the appellant. Copies of the documents for obtaining NOC from respondent#2 is annexed as Annexure-A.
3. That on 14/12/2016, the appellant was appointed as Meter Reader in PESCO after fulfilling all the codal formalities. Copy of the appointment order dated 14/12/2016 is annexed as Annexure-B.
4. That the respondents were pleased to relieve the services of the appellant while allowing him lien and resultantly the appellant was relieved from his services and joined PESCO. Copies of relieving order and lien order are annexed as annexure-C.
5. That during the services in PESCO and in lien period, the appellant submitted an application to the respondent#2 for his reinstatement in the services but the respondent#2 unfortunately vide impugned order dated 18/06/2019 without communication to appellant rejected the plea of the appellant and later this order was issued to the appellant on 19/08/2019. Copies of the application along with impugned order dated 18/06/2019 passed by respondent#2 are annexed as Annexure-D.

8/2/19

ATTESTED

[Signature]
 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

6. That feeling aggrieved with the order of the respondent#2, the appellant submitted an appeal to the respondent#1 which also met with the same fate i.e rejection. Copies of the application to respondent#1 along with impugned order dated 18/11/2019 passed by respondent#1 are annexed as Annexure-E.
7. That feeling aggrieved with the Impugned orders dated 21/11/2019 and 18/06/2019 passed by respondents#1 & 2 respectively, the appellant is having no other remedy except to knock at the door of this honorable forum on the following grounds.

G R O U N D S

- a. That it is an admitted fact that the appellant is an Ex-old employee of the police Department who joined his service as "Constable" BPS-05 in the year 2006.
- b. That the impugned orders passed by respondent#1 & 2 are against law and against the norms of justice.
- c. That the respondents#1 & 2 refused the rights of the appellant for which he was entitled for his reinstatement in services during the lien period.
- d. That the impugned orders of respondents#1 & 2 are not sustainable in the eyes of law because the same are also against the dictums laid down by the August Supreme Court of Pakistan in case citation, 1996 SCMR 284 wherein it has been categorically directed that if any Ex employee wants his reinstatement in his previous services, he cannot be denied but respondents#1 & 2 totally by passed the verdict of the said judgment.
- e. That the impugned orders of respondents#1 & 2 are not sustainable in the eyes of law and are liable to be set aside

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(31)

(16)

and the appellant deserves to be reinstated in the department.

- f. That the appellant requests for his reinstatement in the services on the ground that the PESCO officials were not regularizing the services of the appellant despite the fact that the appellant was a regular employee of the respondents department and refusal on the part of PESCO by not regularizing the services of the appellant rather by directing the appellant to resign from his services resulted the appellant to submit the application for his reinstatement in respondents department but the respondents failed to consider the plea of the appellant. Copy of letter dated 03/04/2018 is annexed as Annexure-E.
- g. That valuable rights of the appellant are very much involved and if the services of the appellant are not reinstated the appellant shall become unemployed and later appellant will not be able to apply for any job being over age candidate.
- h. That appellant is medically fit and is able to perform his duties in respondents department.
- i. That the appeal of the appellant is after the final orders of respondent#1 which is well within time and this forum is the only competent forum to adjudicate and hear the matter of appellant.

8/2/16

It is therefore, on acceptance of the instant appeal and by setting aside the impugned orders dated 21/11/2019 and 18/06/2019 issued by respondents#1 & 2 respectively with the directions to the respondents to reinstate the petitioner at his previous job as Constable in the District Dera Ismail

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Khan being the eligible candidate with all back benefits.

Dated: /___/2019

Your humble appellant

Muhammad Shakeel Khan

Through Counsel

Burhan Latif Khaisori
Advocate High Court

CERTIFICATE

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.

_____.2019

Appellant

NOTE

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

_____.2019

Appellant's counsel

AFFIDAVIT

I, **Muhammad Shakeel Khan**, the appellant, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following our instructions;
2. That all para-wise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.

Deponent

Identified By:-

Burhan Latif Khaisori
Advocate High Court,
D.I.Khan

Attested
Commissioner
D.I.Khan

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application: 18/7/22
 Number of Copies: 2000
 Copying Fee: 37/-
 Total: 2000/-
 Date of Completion of Copy: 18/7/22
 Date of Delivery of Copy: 18/7/22

(33)

Annexure 'A'

The Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Through: Proper Channel.

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDERS DATED 18/06/2019
AND 21/11/2019.

Respected Sir,

The appellant humbly submits as under:

That appellant was appointed as police constable in police department in the year 2006, the appellant served the Police department from 2006 to 2015 as constable # 115. During service the appellant applied for the post of Meter Reader in PESCO after getting NOC from Police department. The appellant on 14/12/2016 was appointed as Meter Reader in PESCO after fulfilling all the codal formalities. The appellant requested the Police Department to relieve his services while allowing him lien which was accepted and the appellant was relieved from his services and the lien period of two years from 10/01/2017 to 10/01/2019 was also granted to the appellant as per DPO order book No.94 dated 10/01/2019. The appellant during his services in the PESCO had to request for his reinstatement in the Police Department on the grounds that the PESCO OFFICIALS were not regularizing the services of the appellant. The lien period of appellant stood finished on 10/01/2019 and very unfortunately the appellant was implicated in a false criminal case and the appellant during that period was in jail when the lien period of appellant stood finished on 10/01/2019 and was acquitted on 14/03/2019. As the appellant released from jail he made an application dated 23/03/2019 to the RPO which was turned down through order dated 18/06/2019 and then the Appellant made another application to your this worthy office which was also turned down saying that this is the fault of the appellant that he got late, Feeling aggrieved the appellant made service appeal to the KHYBER

PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR on 04/12/2019 which was decided through order dated 28/06/2019 and has been sent to this honorable office treating it as departmental representation to decide it in accordance with law within three months from receipt of the Judgment of the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar. The appellant having no other remedy but to file this departmental appeal inter alia on the following grounds.

1. That the appellant was initially inducted in the Police Department in year 2006 and the appellant served the Police Department from 2006 to 2015 as constable No. 115.
2. That during service in the Police Department the appellant applied for the post of Meter Reader in PESCO after getting NOC from Police Department. The appellant on 14/12/2016 was appointed as Meter Reader in PESCO after fulfilling all the codal formalities.
3. That the appellant requested the Police Department to relieve his services while allowing him lien which was accepted and the appellant was relieved from his services and the lien period of two years from 10/01/2017 to 10/01/2019 was also granted to the appellant as per DPO order book No.94 dated 10/01/2019.
4. That appellant during his services in the PESCO had to request for his reinstatement in the Police Department on the grounds that the PESCO OFFICIALS were not regularizing the services of the appellant.
5. That the lien period of appellant stood finished on 10/01/2019 and very unfortunately the appellant had falsely been implicated in a criminal case and the appellant was in jail when his lien period stood finished on 10/01/2019.
6. That the appellant was acquitted on 14/03/2019 and as the appellant released from jail he made an application dated 23/03/2019 to the RPO which was turned down through order dated 18/06/2019 and then the Appellant made another application dated 29/08/2019 to your this worthy office which was also turned down through order dated 21/11/2019 saying that this is the fault of the appellant that he got late.

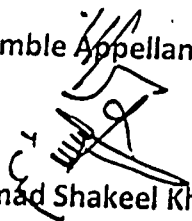
(35)

7. That the appellant could not make application within time as per order of this worthy office and the delay occurred was not deliberately at all but due to imprisonment in a false FIR NO. 231 dated 16/04/2018. Copies are annexed.
8. That the appellant has served the Police Department from 2006 to 2015 and the appellant had also been asked from PESCO high Ups for resigning. The appellant is a poor man and unemployed for a long time and having no job to bear his own and family's expenses.
9. That the appellant is sending this appeal to your worthy office along with attested copy of the order dated 28/06/2022 of the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar and the same has been sent to your worthy office by the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar itself.

It is, therefore, humbly requested that appellant may kindly be reinstated and departmental Appeal of the appellant may kindly be accepted and he may be reinstated with all the back benefits

Dated 20 /07/2022

Your Humble Appellant


Muhammad Shakeel Khan
Ex-Constable No 115

Police Department

D.I.Khan.

Cell No: 923467997000

Cnic No:12103-7494355-7

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Annexure K



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA,
Central Police Officer,
Peshawar.
Gmail:- E4branchcpo@gmail.com

ORDER

The Khyber Pakhtunkhwa Service Tribunal Peshawar has passed judgment in Service Appeal No. 1637/2019 dated: 28.06.2022 titled Muhammad Shakeel Khan (Ex-constable No. 115 District Police DIKhan) versus IGP Khyber Pakhtunkhwa & others, wherein the respondents were directed that:-

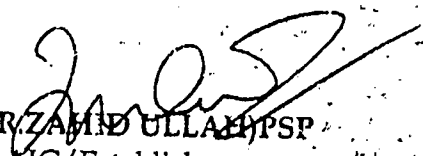
We treat the instant appeal as departmental representation and sent it to the IGP Khyber Pakhtunkhwa to decide it in accordance with law within three months from the receipt of this judgment.

In compliance of the above judgment the competent authority has constituted a committee under the Chairmanship of the DIG/HQrs: comprising of the following Officers for the disposal of departmental representation:-

DIG / HQrs:	Chairman
AIG / Establishment	Member
AIG / Legal	Member
DSP / HQrs: DIKhan	Member
OASI DIKhan	Member

The committee meeting will be conduct on 06.09.2022 at 11:00 hrs in Central Police Office, Peshawar.

All the officers are requested to attend the meeting on due date and time.


(DR. ZAHID ULLAH) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. 7891-97 /E-IV dated Peshawar the 29 / 08/ 2022

Copy forwarded to the:-

1. Regional Police Officer, DIKhan Region DIKhan
2. District Police Officer, DIKhan w/r to his office letter No. 649/Legal dated 03.08.2022 with the request to inform the appellant to appear before the committee proceeding on due date and time.
3. AIG / Legal, Khyber Pakhtunkhwa, Peshawar.
4. DSP / HQrs: DIKhan.
5. PA to DIG / HQrs: Khyber Pakhtunkhwa.
6. PA to AIG / Establishment Khyber Pakhtunkhwa.
7. OASI DIKhan with the direction to bring all the relevant record/document of the appellant.

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جناب عالی!

موضوعہ گزارش ہے کہ سائل مورخہ 31.5.06 کو محکمہ پولیس ضلع ڈیرہ اسماعیل خان میں بچہ کنسٹیبل
 نمبر 8537/E-IV ایئر نمبر 8537/E-IV ایئر نمبر 8537/E-IV ایئر نمبر 8537/E-IV ایئر نمبر 8537/E-IV ایئر نمبر
 مورخہ 06.07.2015 بجاریہ جناب IGP صاحب NOC حاصل کر کے بحوالہ آرڈر نمبر 2346/HR
 مورخہ 14.12.2016 بجاریہ جناب نمبر HRMI پيسا محکمہ واپڈو میں بطور میسرز پیر نمبر 2346/HR ایئر نمبر
 بحوالہ ڈائری نمبر 41 مورخہ 7.2.17 صوبائی واپڈو دفتر میں جمع کرائے اور بعد از اجازت ماضری کر کے ڈیوٹی سرانجام دے رہا
 ہے۔ لیکن 01 سال گزارنے کے باوجود نہ تو سائل کو اپنی سابقہ مدت ملازمت ملی اور نہ ہی سائل کو محکمہ پيسا (واپڈو) میں مستقل کیا
 گیا۔ بلکہ 01 سال کا آزمائشی عرصہ گزارنے کے بعد اب شدید ہے کہ پھر سے کنٹریکٹ پر یڈ بڑھایا جا رہا ہے۔ جو کہ سائل کے ساتھ
 سراسر ناانسانی ہے اور اس وجہ سے سائل مستقل طور پر اپنے مستقبل کے حوالے سے پریشانی کا شکار ہے اور محکمہ پيسا (واپڈو) میں
 مزید ملازمت جاری نہیں رکھنا چاہتا۔

لہذا بذریعہ درخواست استدعا ہے کہ سائل کو اپنے نمبر بندہ محکمہ پولیس میں 02 سال کے لئے Lien کے حقوق حاصل
 ہیں اس لئے سائل کو دوبارہ محکمہ پولیس کو بھجوا دیا جائے۔ اور جناب IGP صاحب سے اجازت حاصل کرنے کے لئے تحریر فرمایا
 جاوے۔ تاکہ سائل اپنے محکمہ پولیس ضلع ڈیرہ اسماعیل خان میں ماضری کر سکے اور اس مستقل ڈیٹی کو فٹ و پریشانی سے نجات
 حاصل کر سکے۔

بین ماتحت پروری ہوگی۔
 مورخہ 18.12.2017

العارض

محمد شکیل خان میسرز پیر سب ڈویژن مندرتھراں، ضلع ڈیرہ اسماعیل خان
 سابقہ کنسٹیبل نمبر 115 محکمہ پولیس ضلع ڈیرہ اسماعیل خان
 اکاپی برائے استدعا:
 جناب انسپکٹر جنرل آف پولیس، خیبر پختونخوا، پشاور

38

WAPDA House, Shami Road Peshawar - Pakistan
Phone No: +92 91 921 20 41 Ext. 207-208
Website: www.wapda.gov.pk
Dated: 22/02/2018

Superintending Engineer (Op)
PESCO Bannu Circle
Bannu

Subject: APPLICATION OF MR. MUHAMMAD SHAKEEL METER CHANGE
Memo: Reference your office letter No. 45 dated 01.01.2018.

1161
19-03-2018
C/O

Please direct Mr. Muhammad Shakeel Khan, Meter Reader to resign from PESCO Service by completing all codal formalities as per conditions of his office of appointment and then join his previous department.

Stamp: S.E. PESCO Bannu

Signature of Deputy Manager (HR)
PESCO Peshawar

Copy to:
1. Circulation file.

27/2

S.E. PESCO B/C Bannu

D.O.T	
C.C.	
...	

596

27-2-18

45/2-27

3285

103/2018

Copy of the above forwarded to PESCO Bannu
@ Khan on 19/2/18
80 dt 19/2

Endst: No. 3285 ; Dt: 103/2018

Forwarded to SDC PESCO Peshawar/Andra D.Khan for immediate n/action.

EXECUTIVE ENGINEER n:
PESCO (Rural) Division
D.I. Khan.

PHIP

Handwritten mark

Handwritten mark

PESHAWAR ELECTRIC SUPPLY COMPANY

Wapda House, Shami road
Peshawar Pakistan
Phone No.+92919212041
Ext. 207-208
Website www.pesco.gov.pk

No. 5915-16/ HR/PESCO /11/313

Dated: 20/02/2018

Superintending Engineer (OPR)
PESCO Bannu Circle
Bannu.

**SUBJECT: APPLICATION OF MR. MUHAMMAD SHAKEEL METTER
READER**

Memo:

Reference your office letter No.45 dated: 01-01-2018.

Please direct Mr. Muhammad shakeel Khan, Metter Reader to resign from PESCO Service by Completing all codal formalties as per condition of his offer of appointnment and then join his previous department

**Deputy Manager (HR)
PESCO Peshawar**

Copy to:-

1. Circulation file.

Endst No. 3295/

Dated: 20-03-2018

Forwarded to SDO PESCO Paharpur / Mandra DIKhan for immediate necessary action.

**Executive Engineer
PESCO (Rural Division
DIKhan**

(39)

"D" "E"

(13)

No. 1460-61 /C.B
To:

Dated 03 14/2018

Mr. Muhammad Shakiel M/Reader
Baharpur S/Divn:

Subject:- APPLICATION OF MR. MUHAMMAD SHAKIEL METRO READER
No.:

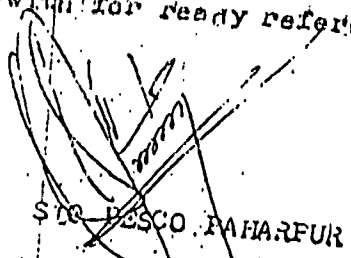
Ref: Dy. Manager (HR) PESCO Peshawar Office letter
No. 5915-16 dt: 20-02-2018, endorsed vide XEN PESCO Rural Divn:
DIKhan No. 3285 dt: 20-03-2018.

It has been directed by the Dy. Manager (HR) PESCO Peshawar vide his office memo No. Inver dt: that Mr. Muhammad Shakiel M/Reader may be directed to resign from PESCO Service by completing all formalities as per condition of offer of appointment & then join his previous department.

You are hereby directed to resign from PESCO Service by completing all formalities as per condition of offer of appointment & then join your previous department.

Also copy of Dy. Manager (HR) PESCO Peshawar Office No. 5915-16 dt: 20-2-2018 is sent herewith for ready reference.

DA/a.u.


S/O PESCO BAHARPUR

Copy to:
The XEN PESCO Rural Divn: DIKhan for inf: w/r to above please.

S/O PESCO BAHARPUR.

BETTER COPY

39/1



No. 1460-61/C.3

Dated: 03-04/2018

**Mr. Muhammad Shakeel Metter Reader
Paharpur Sub Division**

**SUBJECT: APPLICATION OF MR. MUHAMMAD SHAKEEL METTER
READER**

Memo:

Inf: Dy: Manager (HR) PESCO Peshawar office letter No.5915-16 dated: 20-02-2018. Endorsed vide XEN PESCO Rural Division DIKhan No.3285 dated: 20.03.2018.

It has been directed by to Dy: Manager (HR) PESCO Peshawar vide his office memo No. under inf: r. Muhammad Shakeel Metter Reader may be Directed to resign from PESCO service by completing all Codal formalities as per condition of offer of appointment & then joint his previous department.

You are hereby directed to resign from PESCO service by completing all codal formalities as per conditions of offer of appointment and then joint you previous department.

Also copy of Dy: Manager (HR) PESCO Peshawar Office No.5915-16 dated: 20-02-2018 is sent herewith for ready reference.

SDO PESCO PAHARPUR

Copy to:

The XEN PESCO Rural Division, DIKhan for inf: w/r to above please.

SDO PESCO PAHARPUR



وکالت نامہ

40

FAIZAN ALI KHAN

Advocate / bc-18-1128 Date of Issue: July 2021 Valid upto: July 2024



Secretary KP Bar Council

کورٹ فیس

Before The KHYBER Pakhtunkhwa Service Tribunal, D. I. Khan (Appellant) Muhammad Shakeel Khan Provincial Police officer and other (Service Appeal)

باعث تحریر آنکہ D. I. Khan

Faizan Zaidi Advocate High Court

مقدمہ مقدمہ بالا عنوان میں اپنی طرف واسطے بروری وجوہات دی برائے پیشی یا تعلقہ مقدمہ نام... کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بذریعہ رو بہ عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارتے جانے مقدمہ وکیل صاحب...

ہذا وکالت نامہ لکھ دیا ہے تاکہ سند سے مورخہ 10 اکتوبر 2022

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Attested Faizan

ایڈووکیٹ