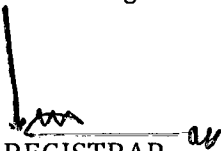




Form- A

FORM OF ORDER SHEET

Court of _____


Case No.- 835/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/05/2022	<p>The appeal of Mr. Muhammad Sohaib presented today by Mr. Javed Iqbal Gulbela Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>21-06-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	21.06.2022	<p>Junior of learned counsel for the appellant present and requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 06.07.2022 before S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member (E)</p>

Handwritten notes in the left margin:
1-6-2022
31/5/22

06th July, 2022


Counsel for the appellant present. Let pre-admission notice be issued to the respondents. To come up for reply/preliminary hearing on 05.09.2022 before S.B.


(Kalim Arshad Khan)
Chairman

05.09.2022

Appellant present in person. Mr. Kabir Ullah Khattak, Additional Advocate General respondents present.

Learned AAG sought time for submission of written reply. To come up for written reply/preliminary hearing on 25.10.2022 before S.B.


(Fareeha Paul)
Member (E)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

In Re S.A. 835 /2022

Muhammad Shoaib Ex- Constable

VERSUS

- Deputy Inspector General of Police and others

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4	Addresses of parties		8
5.	Copy of FIR	"A"	9
6	Copy of Impugned Office order No. 3279-83/PA dated: 20-06-2012	"B"	10
7	Copy of the Order & Judgment Dated: 20-02-2018 & the Compromise Deed	"C & D"	11-16
8	Copy of the Departmental Appeal Dated: 19-03-2018	"E"	17
9	Copy of the Revision Petition Dated: 08-03-2022 & Impugned Order Dated: 18-05-2022	"F" & "G"	18-19
11	Wakalat Nama		20

Dated: 23-05-2022

Petitioner/Appellant

Through

**Javed Iqbal Gulbela
Advocate Supreme Court,
Pakistan.**

Office Address: 9-10A Al-Nimrah Centre, Govt College Chowk Peshawar

(1)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

In S.A _____/2022

Muhammad Shoaib Ex-Recruit Constable No. 688 at RTW Kohat,
R/o Post office, Samana ,Hangu.

----- *Appellant*

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. District Police Officer – DPO Hangu.
3. Regional Police Officer, Kohat.

----- *Respondents*

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT -1974 AGAINST THE
IMPUGNED DISMISSAL ORDER No. 3279-83/PA
DATED 20-06-2012 ISSUED BY THE OFFICE OF
RESPONDENT NO. 2, WHEREBY THE APPELLANT
WAS DISMISSED FROM SERVICE AND AGAINST
THE IMPUGNED OFFICE ORDER NO. S/1009/22
DATED: 18-05-2022 OF THE OFFICE OF
INSPECTOR GENERAL OF POLICE KHYBER
PAKHTUNKHWA, WHEREBY THE REVISION
PETITION OF THE APPELLANT WAS TURNED
DOWN IN A CLASSICAL, CURSORY AND WHIMSICAL
MANNER.**

Respectfully Sheweth,

1. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable family.
2. That after being envisaged with the ordeals and inquisitions of selection process, the Appellant got inducted onto the rolls of the highly prestigious Police

2

Department on 30-03-2011, where after the Appellant was sent to Kohat for receiving and participating in the mandatory Basic Recruit Course & Trainings at RTW Kohat and for the long & rigorous 6 months of training, after which the Appellant returned to his parent district to spend a short vacation of ten days at his home.

3. That it was in the backdrop of late 2011, where the tragedy & adversity awaited the Appellant and on the first day of his arrival at his place, he got charged/booked in criminal case U/S 302/324/34 of PPC, FIR bearing No. 97 Dated: 23-12-2011 of the Police Station Bilyamina. **(Copy of FIR is annexed here as Annexure "A")**
4. That on the other hand, after his return to his parent District, as the Appellant did not get any chance to make an arrival report at Police Lines Hangu, thus the service of the Appellant was repatriated to his parent Department and in accordance with the same, disciplinary actions in the light of Police Disciplinary Rules 1975, of the Police Department, against the Appellant commenced but neither any Show-Cause Notice nor any Statement of Allegations was served upon the Appellant. Later-on, no fair inquiry was conducted against the Appellant, nor any Final Show Cause Notice was ever served upon the appellant and thus the final abominable step came up whereby the services of the Appellant were outright dismissed, vide the impugned office order No. 3279-83/PA dated: 20-06-2012 by the District Police Officer Hangu. **(Copy of the Dismissal Order is annexed here as Annexure "B")**
5. That it is a human nature that if someone is booked in criminal case, to clean himself of the charges levelled against him, one must abscond, and same has been done

(3)

by the Appellant as he absconded for 6 years, which was beyond his control, hence the Appellant was unable to perform his duty. It is pertinent to mention here that during the action-packed days, the Appellant surrendered himself before the Court of Law against the charges and was busy in contesting his case, thus was not able to join his duties.

6. That costing an arm & leg, the Appellant compounded/patched up the matter, whereby complainant arrived at a genuine compromise with the Appellant and hence the Appellant was acquitted of the charges levelled against him and was set free forthwith dated: 20-02-2018. **(Copy of the Order & Judgment Dated: 20-02-2018 and the Compromise Deed is annexed here as Annexure "C" & "D")**
7. That being a vigilant fellow in law, the Appellant right after his acquittal from the charges preferred the Departmental Appeal on 19-03-2018, to the Respondent Department of Regional Police Office to inform the adversity that fell on the Appellant, but that too remained shelved without any rem and reason. **(Copy of the Departmental Appeal is annexed here ,as Annexure "E")**
8. That feeling aggrieved from the above-mentioned acts of the Respondent No. 2, the Appellant moved a Revision Petition before Respondent No. 1 for his reinstatement into service but there was no light to the end of the tunnel and hence Revision Petition of the Appellant was turned down vide Office Order No. 1009/22, Dated: 18-05-2022. **(Copy of the Revision Petition is annexed here as Annexure "F")**

(4)

9. That from the above cited story, the grievances, that comes into existence, having no other adequate remedy available, and forum to be addressed at, the Appellant approaches this Hon'ble Tribunal for setting aside the impugned Dismissal order, and his re-instatement into service, upon the following grounds, inter-alia:

Grounds:

- A. That the dismissal order is wrong, illegal, vide ab-initio and is not sustainable at all.
- B. That the impugned dismissal order is unwarranted, illogical and against the Rules so therefore not maintainable at all.
- C. That no proper inquiry was ever conducted in case of the appellant, nor the appellant was ever heard in person, nor was ever allowed to cross examine any witness and thus the appellant was condemned unheard.
- D. That the appellant was charged in a criminal case and was in absconding, thus could not report to the department and on the other hand the department took the same as deliberate absence from duty and was proceeded against departmentally.
- E. That even the departmental appeal of the appellant was simply shelved without any reason, nor the appellant was ever summoned by the appellant authority as per Appeal Rules 1986 and thus the appellant was double jeopardized.
- F. That the appellant has already been declared as innocent by the competent court of law acquitting him of the charges levelled against him, which was ample proof of the innocence of the appellant.
- G. That the appellant belongs to a poor family and is the only earning hand in the whole family to look after them.
- H. That from every angle the appellant is liable to be re-instated into service with all back benefits.

5

- i. That any other ground not raised here may graciously be allowed at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant Appeal, the Impugned Office Order No. 3279-83/PA DATED 20-06-2012 of the office of Respondent No. 02 and Impugned Order No. 1009/22 Dated: 18-05-2022 of the respondent no. 1 may graciously be set-aside and by doing so the Appellant may very graciously be re-instated into Service with all back benefits.

Any other relief not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated: 23/05/2022.

Appellant

Through

Mr. Javed Iqbal Gulbela
Advocate Supreme Court,
Pakistan.

Mr. Saghir Iqbal Gulbela
&
Mr. Ahsan Sardar
Advocates, High Court
Peshawar.

NOTE:-

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

Advocate.

(6)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

In Re S.A _____/2022

Muhammad Shoaib Ex- Constable

VERSUS

Deputy Inspector General of Police and others

AFFIDAVIT

I, **Muhammad Shoaib, Ex-Constable** do hereby solemnly affirm and declare that all the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

DEPONENT

Identified By:

Javed Iqbal Gulbela
Advocate High Court
Peshawar.

(7)

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR.**

In Re S.A _____/2022

Muhammad Shoaib Ex- Constable

VERSUS

Deputy Inspector General of Police and others

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth,

1. That the petitioner is filing the accompanying appeal the contents of which may graciously be considered as integral part of the instant petition.
2. That the petitioner had preferred departmental period within one month from the Impugned dismissal order, but when the appeal was preferred, the Appellant's mother was suffering through the decline in her health and being the sole caretaker of his mother, the Appellant spent the days & night to serve his mother.
3. That delay in approaching this Tribunal was due to perusing the above-mentioned noble cause & foremost duty, which was neither intentional, nor was under control of the Appellant.
4. That law also favor adjudication on merits and technicalities of any sort must always be ignored while reaching a just and fair disposal of any les.
5. That for proper disposal of the accompanying case on its merits, the condonation of delay is indispensable.
6. That not only the Appellant has got a prima facie case and having balance of convenience in his favor, but would suffer irreparable loss, if the instant petition is not allowed.

It is, therefore, most humbly prayed that on acceptance of the instant petition, the delay in filing the accompanying appeal may graciously be condoned and the accompanying appeal may very graciously be decided on its merits.

Petitioner/Appellant

Through

**Javed Iqbal Gulbela
Advocate Supreme Court,
Pakistan.**

2

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

In Re S.A _____/2022

Muhammad Shoaib Ex- Constable

VERSUS

Deputy Inspector General of Police and others

ADDRESSES OF PARTIES

APPELLANT:

Muhammad Shoaib Ex-Recruit Constable No. 688 at RTW Kohat, R/o
Post office, Samana ,Hangu.

ADDRESSES OF RESPONDENTS:

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. District Police Officer - DPO Hangu.
3. Regional Police Officer, Kohat.

Dated: 23/05/2022.

Petitioner/Appellant

Through

**Javed Iqbal Gulbela
Advocate Supreme Court,
Pakistan.**

This order of mine will dispose off, the departmental enquiry initiated against Recruit Constable Shoaib Khan No. 688 on the basis of allegations that he while undergoing Basic Recruit Course at RTW Kohat, he was returned to his parent district as unqualified, he did not make any arrival report at Police Lines, Hangu thus, he was deliberately absented himself from official duty with effect from 05.01.2012 till now without any leave or prior permission which shows disinterest and also amounts to gross misconduct on his part.

He was served Charge Sheet together with Statement of Allegations under Khyber Pakhtunkhwa Removal from service (Police Disciplinary Rules, 1975) to which he failed to submit his reply. Mr. Aziz-ur-Rehman, DSP Legal, Hangu was appointed as Enquiry Officer to conduct departmental enquiry against him. After completion of enquiry, the enquiry officer submitted his findings on 08.04.2012, defaulter Recruit Constable charged in case vide FIR No. 97 dated 23.12.2011 U/Ss 302/324/34 PPC Police Station, Bilyamina is fit to be discharged from service under Police Rule Chapter-12 Para-21 from the date of his absence.

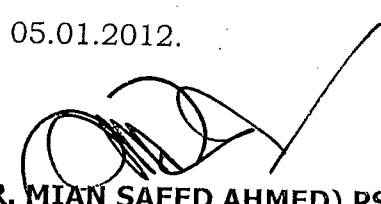
Thereafter, he was called in Orderly Room on 22.05.2012, he disappear, second OR was also called on 05.06.2012, he did not turn up, so final Orderly Room was called on 12.06.2012 but he failed to appear before the undersigned.

Keeping in view of above and having gone through available record, the undersigned has come to the conclusion that the defaulter constable absented himself from duty, failed to appear and defend himself, which indicates that he was not interested to serve further. Moreover, in these circumstances his retention in Police Department is burden on public exchequer, therefore, I, Dr. Mian Saeed Ahmed, PSP, District Police Officer, Hangu in exercise of the powers conferred upon me, awarded him major punishment of Dismissal from Service under Police Rule Chapter-12 Para-21 from the date of his absence i.e 05.01.2012.

Order Announced.

OB No. 321

Dated 20/6 /2012.


(DR. MIAN SAEED AHMED) PSP,
DISTRICT POLICE OFFICER,
HANGU.

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU

No. 3279-23 FA, dated Hangu, the 20/06/2012.

Copy of above is submitted to the Regional Police Officer, Kohat Region, Kohat for favour of information please.

2. Pay Officer, Reader, SRC & OSI for information and strict necessary action.


(DR. MIAN SAEED AHMED) PSP,
DISTRICT POLICE OFFICER,
HANGU.

JAVED
Gul Boh
Gumbor
Peshawar
3501

الدیوباب ڈسٹرکٹ سیشن جج محمد مقدر
 51
 20/2/18 معینہ 17/12/17 پورن 52167/17 "C"

سینا زعم محمد شیب (معرفان)
 302/324/34 PC 28/12/11 مع 97

Annexure
"C"

of which are placed
 Mr. Zahid Shah
 for

No. of Order/ Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3
0.....06 COURT OF DISTRICT & SESSIONS JUDGE DISTRICT PESHAWAR 10/10/2018	20.02.2018	<p><i>Learned DPP for the State, accused Mohammad Shoaib in custody while accused Misri Khan on bail with their counsel present. Complainant Gul Hameed, Noor Hameed, Mohammad Habib, Mst Warkham Jana widow of deceased for herself and as Wali of her minor children namely Mst. Samreen aged about 11 years, Mst Hazrat Khadeeja Bibi aged about 10 years, Mst Ajra aged about 17 years (daughters of deceased), Naveed Ullah aged about 9 years, Asif Nawaz, Gul Nawaz and Mst Hazrat Shafia also present.</i></p> <p><i>Accused stands charged in case FIR No. 97 dated 28.12.2011u/ss. 302/324/34 PPC PS Arif Hussain Shaheed, Hangu.</i></p> <p><i>Complainant and legal heirs of the deceased stated at the bar that they have patched up the matter with accused facing trial. They produced affidavits of compromise EXPA, EXPA/1 and proforma of compromise EXPA/2. To this effect, their joint statement also recorded duly verified and identified by an elder namely Mohammad Haneef and that there is no other legal heir of deceased except these. Accused party deposited amount of Rs. 735,140/- in lieu of 'diyat' amount in favour of minor legal heirs of deceased in shape of Defence Savings Certificates in National</i></p>

[Handwritten signature]

JAVED IQBAL
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob. 034519405501

CERTIFIED
 9/3/12
EXAMINER
COPYING AGENCY HANGU

4

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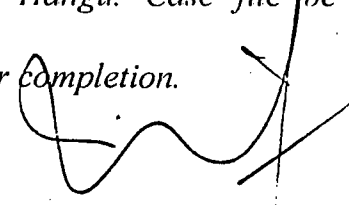
No. of Order
Proceedings
1
0.....06

Contd:06
20.02.2018

Saving Centre, Hangu, photocopies of which are placed on file while original are handed over to Mr. Zahid Shah Budget & Accounts Assistant, Sessions Court, Hangu for its safe custody.

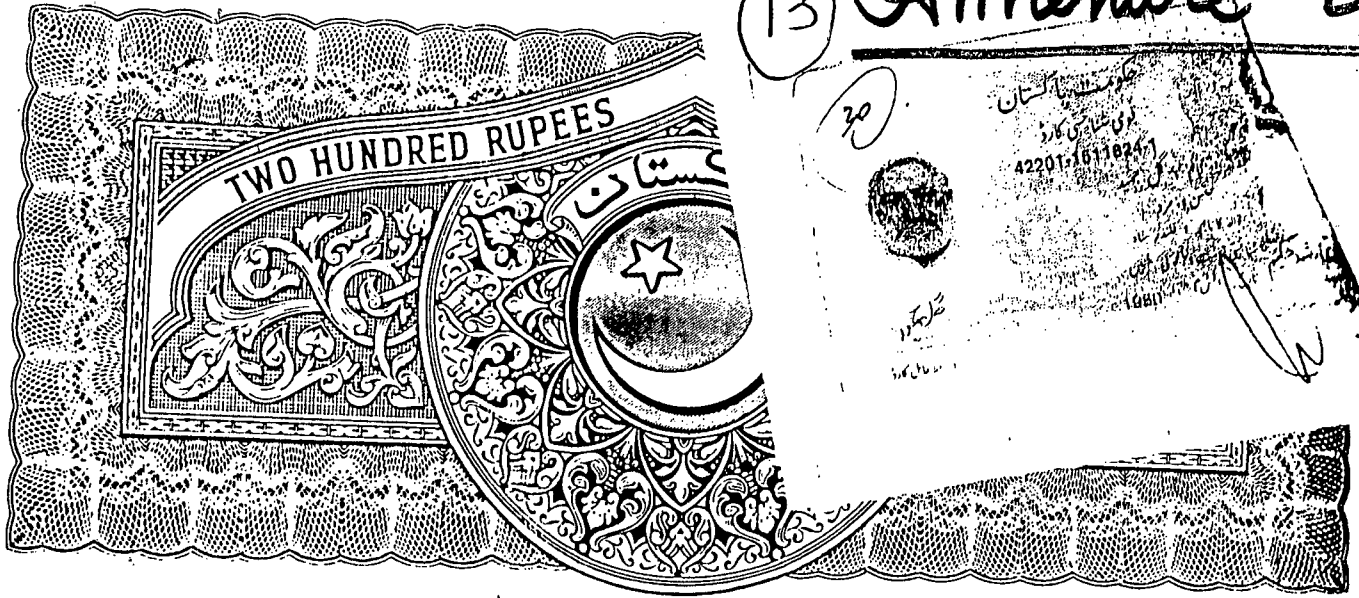
Since, the matter has been patched up between the parties and a genuine compromise has arrived in between the parties and the sections of law, for which accused stands charged are compoundable in nature, so, on the basis of compromise, accused facing trial Mohammad Shoaib and Misri Khan are hereby acquitted of the charge so leveled against them. Accused Mohammad Shoaib is in custody, be set free forthwith if not required in any other case. Accused Misri Khan is on bail, his sureties are discharged from the liabilities of bail bonds. Case property, if any, be kept intact till arrest and trial of already declared PO Gulab Khan vide order dated 20-12-2016 by the Court of learned Additional Sessions Judge-II, Hangu. Case file be consigned to Record Room after completion.

Announced.
20.02.2018.


(MOHAMMAD ASIF KHAN)
Sessions Judge
Hangu

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9/3/18
EXAMINED
COPYING AGENCY HANGU

JAVED IQBAL
Dada 2nd Law Chamber
Advocate High Court - Hangu
Mob: 0345-901500



13

30

بعدالت جناب سیشن جج صاحب ہنگو

ST, H...
20.02.18

(1) محمد شعیب ولد جمال دارخان (2) مصری خان ولد فضل خان ساکنان دارسانہ ہنگو

بنام سرکار

علت نمبر 97 مورخہ 28-12-2011م جرم 302-324-34/512CrPc تھانہ بلیا مینہ

بیان حلفی

(1) گل خمید ولد قلندر شاہ سکند خادومیلہ سانہ ہنگو مدعی/مستغیث

(2) نور خمید ولد سید خمید مدعی/گواہ چشم دید

(3) محمد حبیب ولد غلام حبیب مدعی/گواہ چشم دید

یہ کہ حلفاً بیان کرتے ہیں، کہ اندر میں مقدمہ برخلاف ملزمان مذکورہ دعویٰ داری کی تھی، جنکے ساتھ اب خانگی راضی نامہ ہو کر مکمل مصالحت ہو چکی ہے۔ کوئی تنازعہ یا عداوت ہمارے مابین باقی نہیں رہا۔ ملزمان کو قطعی طور پر معاف کر چکے ہیں۔

یہ کہ حلفاً بیان کرتے ہیں، کہ ملزمان مذکورہ کے خلاف اب مزید کسی قسم کی قانونی کارروائی مطلوب نہیں ہے۔

یہ کہ حلفاً بیان کرتے ہیں، کہ اب اگر ملزمان مذکورہ برضانت رہا فرمائے جائیں/بری فرمائے جائیں، تو مادعیان کو کوئی اعتراض نہ ہوگا

یہ کہ حلفاً بیان اور تصدیق کرتے ہیں، کہ جو کچھ بیان کیا درست ہے، کسی قسم کی غلط بیانی نہیں کی ہے۔ مورخہ 16-Feb-18

العبد	العبد	العبد
محمد حبیب ولد غلام حبیب	نور خمید ولد سید	گل خمید ولد قلندر شاہ
42201-3588575-1	14101-8417248-7	42201-1511824-1

گواہ
محمد حنیف ولد نور سید سکندہ پین خادوم ہنگو

گواہ
محمد حنیف

گواہ
زیارت گل ولد گل مین شاہ سکندہ ملی سانہ

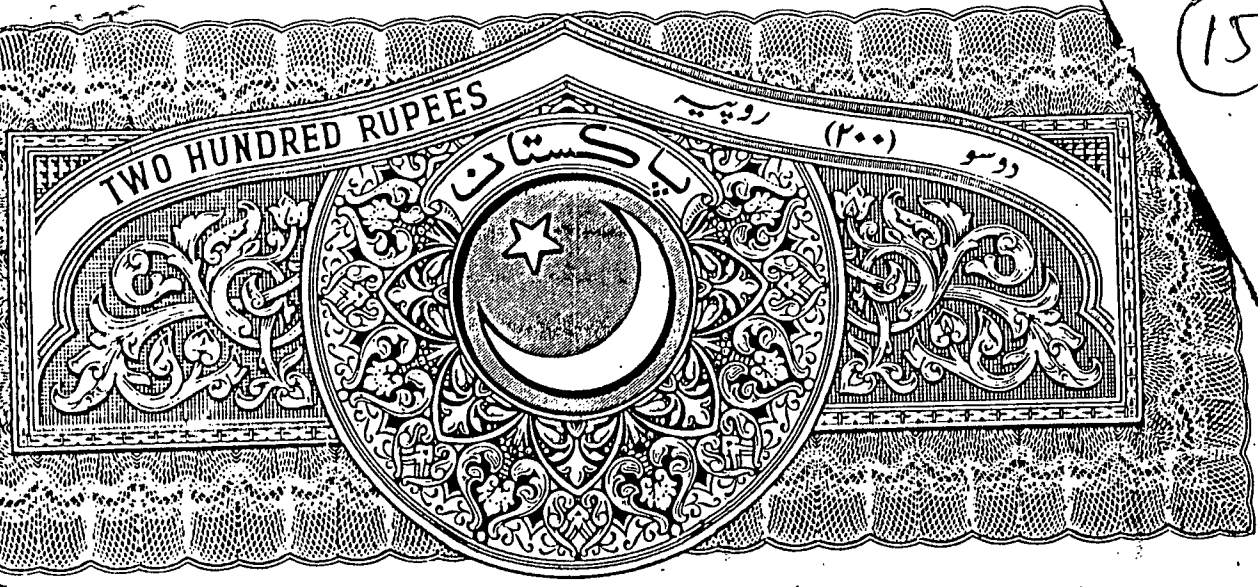
14101-7248740-3

14101-0787543-9

20.02.18

JAVED/OPAI Gul Sala
District Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

9/3/18



Performa for effecting Compromise
Under Qisas & Diyat Ordinance

Exp A/2
Court
Two sheets
S.S
Hangu
20-2-13

- Name (s) of accused with parentage & address:
i) Muhammad Shoaib son of Jamaldar Khan ii) Misri Khan s/o Fazal Khan
residents of Dar Samana Tehsil & District Hangu
2. Conviction(s) and sentence(s) awarded Bail
3. Name (s) of deceased/injured person(s) with parentage & address:
Inayat Badshah s/o Abdul Shah r/o Makhadu Mela Samana Hangu.....Deceased
4. Nature of Offence: FIR No: 97 Dated 28-12-2011 Police station Balyamina
U/S PPC 302-324-34/512CrPc

5. (a) Rate of one gram silver notified by the Government on First July of this year with reference to the date of compromise. Rs 54.85
(b) Total cost of 30630 grams of Silver Rs 1680,320/-
(c) Total amount of Diyat paid by the accused. Rs 735,140/-

6. Name(s) of heir(s) of deceased who are entitled to receive amount of Diyat Or Name(s) of Injured person(s)

(i) Warikham Jana	Widow	<u>Share 210040/-</u>
(ii) Asif Nawaz	Son	<u>Share 294056/-</u>
(iii) Gul Nawaz	Son	<u>Share 294056/-</u>
(iv) Hazrat Shafia	Daughter	<u>Share 147028/-</u>
(v) Hazrat Hajra	Daughter Minor	<u>Share 147028/-</u>
(vi) Samrin	Daughter minor	<u>Share 147028/-</u>
(vii) Hazrat Khadija	Daughter minor	<u>Share 147028/-</u>
(viii) Naveed ullah	Son minor	<u>Share 294056/-</u>

7. (a) In case of Diyat:

Name	R.....with deceased	Share	waived/compound or not
(i) Warikham Jana	Widow	18 th of total	Waived
(ii) Asif Nawaz	Son	2/10 th of residue	Waived
(iii) Gul Nawaz	Son	2/10 th of residue	Waived
(iv) Hazrat Shafia	Daughter	1/10 th of residue	Waived
(v) Hazrat Hajra	Daughter	1/10 th of residue	Compound
(vi) Samrin	Daughter	1/10 th of residue	Compound
(vii) Hazrat Khadija	Daughter	1/10 th of residue	Compound
(viii) Naveed ullah	Son	2/10 th of residue	Compound

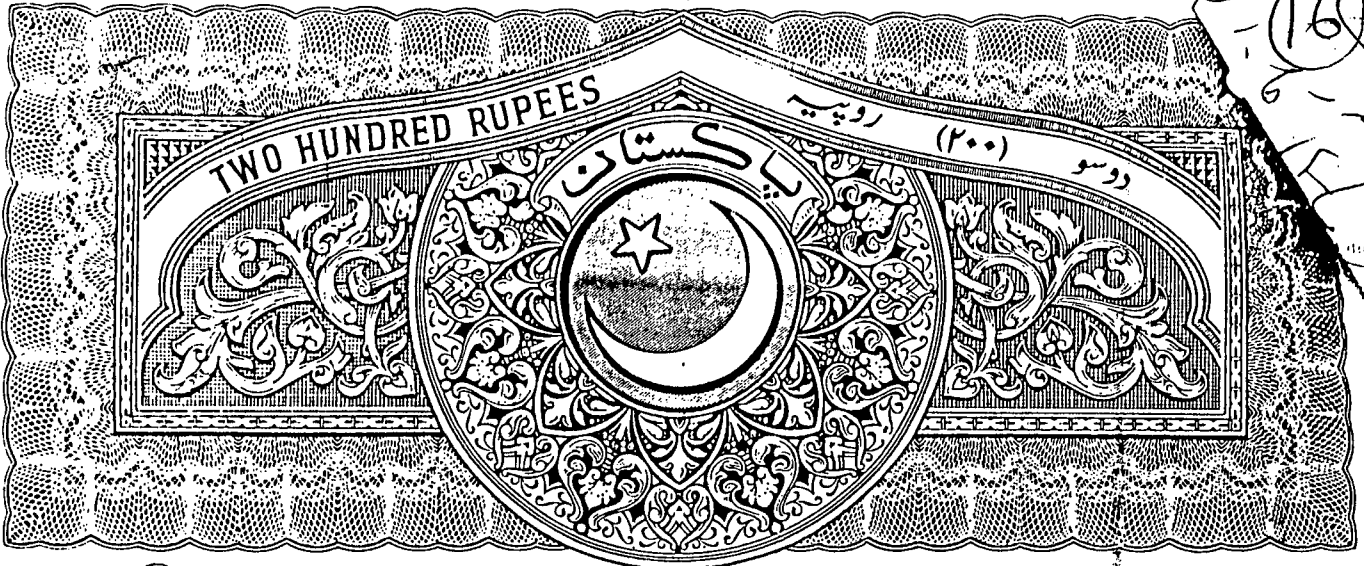
(b) In case of Arsh

Name	Amount Received	waived/compound or not
	Not Applicable	

(C) In case of Daman whether a specific request is made to the court for determination of amount.
Not Applicable

9/3/12

JAVEED JORAL Gul Beh
Daughter Law
Advocate
Mob: 3347-745811



8. (a) Names(s) of minor(s) insane (s) heirs of deceased with full particulars of their guardian and him/her relationship.

Name with parentage	Relationship with Guardian
(i) Hazrat Hajra	Daughter
(ii) Samrin	Daughter
(iii) Hazrat Khadija	Daughter
(iv) Naveed ullah	Son

(b) Steps taken to safeguard/protect the interest of minors/insane/widow/heirs of deceased:

Minor share will be deposited as per Court Directions

9. Mode of Payment: Cash

10. Certificate from MNA/MPA/PA/Magistrate/Nazim of Union Council in proof of the correctness of particulars of heirs of deceased(s).

Not Applicable

11. Affidavit by each heir of victim(s) or injured person certifying waiving or compounding against receipt of "Badle-Sulah" Arsh or otherwise.

Attached

12. Financial Position of

(a) Accused Poor
 (b) Deceased(s) heir(s) Poor

Accused
Muhammad Shoaib

Misri Khan

Heirs of deceased
 Warikham Jana
 14101-2097281-8

Asif Nawaz
 14101-196633-1

Gul Nawaz
 14101-6097484-9

Hazrat Shafia
 14101-7834815-0

Locality Elder
 Ziarat Gul s/o Gulmin Shah
 Sali Samana Hangu
 CNIC No: 14101-0787543-9

Locality Elder:
 Mohammad Hanif s/o Noor Said
 Speen Khawray Hangu
 CNIC No: 14101-7248740-3

Advocate for Petitioner
 District Courts Hangu

JAVED IQBAL, Gul Bela
 District Law Member
 District Courts Peshawar

9/3/22

محضور جناب ریجنل پولیس آفسیر کوپاٹ -

رہم در خواست عمراؤ: عالی ملازمت بعیدہ ریگروٹ پولیس
کنیٹیل محمد شعیب 688 بعد از بری ہونے مقدمہ عدت 97۔
مورخہ: 2011-12-28 -

جناب عالی! مسائل عرض کیا ہیں کہ :-

(1) مسائل مورخہ 2011-03-30 کو بطور پولیس کانسٹیبل
بھرتی ہوا اور 6 ماہ کے دوران ٹریننگ کیکے ضلع پنکو میں
ریا۔

(2) یہ کہ بعد از ٹریننگ کے 15 دن کی چھٹی پر گاؤں والیں
آئے رہی اس دوران مجرم 302 ت۔ پ درمہای میں قریق
نکل آنے کی صورت میں مقرر رہا اور عرصہ دراز اپنی
زندگی کو سنگین خطرات لاحق ہونے کی بنا پر مقرر رہا
ریا جب تک کہ دونوں فریقین مقدمہ کے درمیان راضی نامہ
انجام پایا۔

(3) مسائل اسی راضی نامہ کی بناء پر عدالت سیشن ج صاحب
پنکو سے مورخہ 18-02-20 کو لیری ہوا۔

(4) مسائل ملازمت پر دوبارہ بحال ہونا چاہتا ہے۔

لہذا بعد یہ استدعاء ہے کہ مسائل ایک فریب لہرنے
سے تعلق رکھتا ہے اور پولیس میں دوبارہ بحال ہونے کا
خواہش مند ہے۔

محمد شعیب
مسابقہ کانسٹیبل پنکو

تاریخ: 19-03-2018

بھخور جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ

رحم درخواست برآمد بحالی ملازمت بچہ ریکروٹ پولیس کنسٹیبل محمد شعیب 688 بعد از بری ہونے مقدمہ
علت 97 مورخہ 28.12.2011 جرم 302/324/34 تھانہ بلایا میں بعد الت جناب سیشن جج صاحب ہنگو

جناب عالی!

سائل ریکروٹ کنسٹیبل محمد شعیب 688 ذیل عرض رساں ہے

- 1 سائل مورخہ 30.03.2011 کو بطور پولیس کنسٹیبل بھرتی ہوا۔
- 2 سائل کوٹریٹنگ کے لئے ضلع ہنگو سے RTW کو ہاٹ بھیجا گیا۔
- 3 سائل نے 6 ماہ ٹریننگ کے بعد 10 یوم رخصت پر گاؤں خودایا ایک یوم گزارنے کے بعد سائل پر جرم 302 تپ دعوی داری ہوئی۔
- 4 سائل عرصہ 6 سال مفرور رہا کیونکہ سائل کی زندگی سنگین خطرات لاحق تھے۔ مابعد سائل کی درخواست ضمانت قبل از گرفتاری منظور ہوئی۔
- 5 سائل پر مقدمہ بالا میں بے گناہ دعوی داری کی گئی تھی سائل نے علاقہ مشران اور فریق دوم مشران کو اپنے صفائی پیش کر کے جس کے وجہ سے علاقہ مشران اور فریق دوم کے مشران علاقہ رسم و رواج کے مطابق راضی نامہ ہوا۔
- 6 سائل اسی راضی نامہ پر عدالت سیشن جج صاحب ہنگو سے مورخہ 20.02.2018 کو بری ہوا۔
- 7 سائل ملازمت پر دوبارہ بحال ہونا چاہتا ہے۔
- 8 بھخور جناب DIG صاحب کو اس سے پہلے بھی ہم نے ایک درخواست آپ صاحب کے دفتر میں جمع کیا تھا۔ گزارش کی جاتی ہے کہ سائل پر رحم فرما کر مشکور فرمائیں

بہذا بذریعہ استدعاء ہے سائل ایک غریب گھرانہ سے تعلق رکھتا ہے پولیس میں دوبارہ بحال کرنے کا حکم صادر فرمائیں۔

تحریر 08.03.2022

محمد شعیب نمبر 688 سابقہ کنسٹیبل ضلع ہنگو

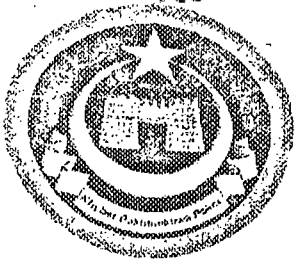
موبائل نمبر 0333-5011642

JAVED IQBAL, S.D. 213
Daudpuri Law Chamber
Advocate High Court Peshawar
Mob. 0345-9415501

Annexure "F-1"

P-16

19



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

No. S/ 1009 /22, dated Peshawar the 18/5 /2022.

To: The Regional Police Officer,
Kohat Region Kohat.

Subject: - REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-Constable Muhammad Shoaib No. 688 of District Hangu Police against the punishment of dismissal from service awarded by District Police Officer Hangu vide OB No. 321, dated 20.06.2012, being badly time barred.

The applicant may please be informed accordingly.

(NOORAFGHAN)
Registrar

For Inspector General of Police,
Khyber Pakhtunkhwa Peshawar

JAVED IQBAL
Daudyal Law Chamber
Advocate, High Court, Peshawar
Mob: 0345-9445501

وکالت نامہ

20

پیشکش کنندہ: پیشکش کنندہ

Service Appellant کی جانب

21-05-2022

تاریخ

پیشکش کنندہ: پیشکش کنندہ

پیشکش کنندہ: پیشکش کنندہ

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پیشکش کنندہ: پیشکش کنندہ

Accepted by:-

BC-10-7924
NIC-17301-14096057
Tanded Legal Services
Gmail.com
Call = 0345-9403501

0353-5011692

Shawwal

3 (Appellant)

پیشکش کنندہ: پیشکش کنندہ

پیشکش کنندہ: پیشکش کنندہ

پیشکش کنندہ: پیشکش کنندہ

پیشکش کنندہ: پیشکش کنندہ

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

APPEAL No. 035 of 20 22

Muhammad Shoaib

Appellant/Petitioner

Versus

Inspector General of Police, K-Pk

RESPONDENT(S)

Notice to Appellant/Petitioner Inspector General of Police, K-Pk

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 05/09/2022 at 11

Pre-admission Notice

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

Copy of Appeal is Attached

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

11-8-2022

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. S.B

No.

APPEAL No. 835 of 20 22

Muhammad Shoaib

Appellant/Petitioner

Versus

L.G.P KPN Peshawar

RESPONDENT(S)

Respondent no. 2.

Notice to Appellant/Petitioner

Dist. Police
Office D.P.O
Manqua

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 5/9/22 at 9.00 am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply
copy of appeal
is attached

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Received
04/30/22

[Signature]

[Signature]