

19th Sept 2022

Counsel for the appellant present and heard.

Against the impugned order dated 03.01.2022, the appellant filed departmental appeal on 31.01.2022 and awaiting ninety days waiting period when no reply received from the respondents, he filed this appeal on 20.05.2022 which is within time. This appeal is admitted to full hearing subject to all just and legal objections by the other side. Appellant is directed to deposit security fee. Out district respondents be summoned through TCS, the expenses of which be deposited by the appellant within three days, while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 14.11.2022 before the S.B at camp court Abbottabad.

Rs 100/-
Appellant Deposited
Security & Process Fee
27/9



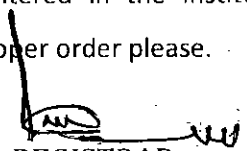


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 929/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/06/2022	<p>The appeal of Mr. Ishtiaq Ahmad resubmitted today by Mr. Muhammad Arshad Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	14-7-22	<p>This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put there on <u>18-7-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	18.07.2022	<p>Nemo for the appellant. Notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for preliminary arguments on 19.09.2022 before the S.B at Camp Court Abbottabad.</p> <p> (Salah-Ud-Din) Member (J) Camp Court Abbottabad</p>

The appeal of Mr. Ishtiaq Ahmad Ex-HC Service No. 4934 r/o village Banda Said Khan Tehsil and District A.Abad received today i.e. on 20.05.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

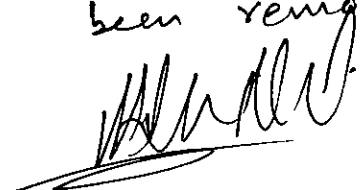
- ✓ 1- Check list is not attached with the appeal.
- ✓ 2- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- ✓ 3- Chamber address and phone number of counsel has not been mentioned on index/wakalat nama.
- ④ 4- Detail of documents has not been given on the flagged.
- ✓ 5- The authority to whom the departmental appeal was made has not been arrayed a necessary party.

No. 1254 /S.T,

Dt. 06/6 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Arshad Khan Tanoli Adv.
High Court A.Abad.

*Siv, objections have
been removed*


**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Ishaq Khan vs Govt of KPK

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>M. Arshad Khan Tanoli Asc</u>		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly pagged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

M. Arshad Khan Tanoli Asc

Signature:

Office No 33 Jinnah Plaza ATO
0346 9588583

Dated:

18/6/2022

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KP
PESHAWAR.

Ishtiaq Khan

Appeal no-929/2022

...APPELLANT

V E R S U S

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

...RESPONDENTS

SERVICE APPEAL

INDEX

S#	Description of Document	Annexure	Page No.
1.	Service Appeal alongwith Verification and Affidavit	--	1-7
2.	Copy of appointment order of the appellant	"A"	8-9
3.	Copy of leave period dully sanctioned by the competent authority	"B"	10-15
4.	Copy of impugned dismissal order dated 03.01.2021	"C"	16
5.	Copy of departmental appeal	"D"	17
6.	Vakalat Nama	--	18

Ishtiaq Khan
...APPELLANT

Through Counsel:

Dated:- _____/2022

Muhammad Arshad Khan Tanoli
(MUHAMMAD ARSHAD KHAN TANOLI)
Advocate High Court, Abbottabad

BEFORE THE CHAIRMAN SERVICE TRIBUNAL, KP,
PESHAWAR

Ishtiaq Khan Ex-HC Service No. 4934, R/o Village Banda Said Khan,
Tehsil and District Abbottabad.

..... APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribunal Affairs, Peshawar
2. Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar.
3. Commandant RRF, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Commandant RRF, Khyber Pakhtunkhwa, Peshawar.
5. RPO Hazara Range, Abbottabad.
6. District Police Officer (DPO), Abbottabad.

..... RESPONDENTS

SERVICE APPEAL

SERVICE APPEAL U/S 4 OF KP SERVICE TRIBUNAL ACT 1974 FOR DECLARATION TO THE EFFECT THAT THE APPELLANT GOT 120 DAYS EARNED LEAVE WEF 26/07/2021 TILL NOVEMBER 2021 AND THEREAFTER THE APPELLANT COULD NOT RESUME HIS DUTY AND APPLIED FOR EXTENSION OF LEAVE

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KP
PESHAWAR.

Ishtiaq Khan Ex-HC Service No.4934, R/o Village Banda Said Khan
Tehsil and District Abbottabad.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribunal Affairs, Peshawar.
2. Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commandant R.R.F, Khyber Pakhtunkhwa, Peshawar.
4. RPO Hazara Range, Abbottabad.
5. District Police Officer (DPO), Abbottabad.

...RESPONDENTS

SERVICE APPEAL

**SERVICE APPEAL U/S 4 OF KP SERVICE
TRIBUNAL ACT 1974 FOR DECLARATION TO
THE EFFECT THAT THE APPELLANT GOT 120
DAYS EARNED LEAVE W.E.F. 26.07.2021 TILL
NOVEMBER 2021 AND THEREAFTER THE
APPELLANT COULD NOT RESUME HIS DUTY
AND APPLIED FOR EXTENSION OF LEAVE**

W.E.F Dec 21 TO Nov, 22 . HENCE, THE APPELLANT HAS BEEN DISMISSED FROM SERVICE VIDE IMPUGNED ORDER NO.13-19/RRF DATED 03.01.2022 THE IMPUGNED ORDER DATED 03.01.2022 OF THE RESPONDENTS ARE ARBITRARY, EX-PARTE AND IS A RESULT OF AUDI ALTERAM PARTEM AND THE SAME IS LIABLE TO BE SET-ASIDE.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED REMOVAL FROM SERVICE ORDER NO.13-19/R.R.F DATED 03.01.2022 MAY BE SET-ASIDE AND RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO REINSTATE THE APPELLANT WITH ALL SERVICE BACK BENEFIT. ANY OTHER RELIEF WHICH THIS HON'BLE TRIBUNAL DEEM APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth,

The facts forming the background of the instant service appeal are arrayed as under:

1. That, the appellant has rendered 18 years of service in the police department. (Copy of appointment order of the appellant is annexed as Annexure "A")
2. That the appellant served the department with due diligence & devotion and left no stone unturned in smooth and transparent function of the department. Resultantly, the entire service record of the appellant is neat and clean.
3. That appellant applied earned leave for four months which was properly granted w.e.f. 26.07.2021 to 26.11.2021. (Copy of leave period dully sanctioned by the competent authority is annexed as Annexure "B")
4. That after expiry of 4 months leave, the appellant further applied extension of earned leave but respondent department instead of granted of earned leave dismissed the appellant

from service vide impugned dismissal from service order No.13-19 R.R.F dated 03.01.2021. (Copy of impugned dismissal order dated 03.01.2021 is annexed as Annexure "C")

5. That feeling aggrieved, the appellant filed departmental appeal but department did not respond to the appeal of the appellant. (Copy of departmental appeal is annexed as Annexure "D")

Hence, the instant service appeal is filed inter-alia on the following grounds:

GROUND:-

- a) That, the appellant has been dismissed from service w.e.f. 03.01.2022 and leave period w.e.f. 28.07.2021 to 28.11.2021 has been declared leave without pay which is perverse, discriminatory, malafide, against the law and the impugned order is liable to be set-aside.
- b) That the respondents' department carried out ex-parte proceedings. As a result no show cause notice, statement of allegations and

opportunity of personal hearing has been provided to the appellant. Hence, the impugned dismissal from service order dated 03.01.2022 is the result of audi alteram partem therefore. The impugned dismissal from service order dated 03.01.2022 is not maintainable in the eyes of law.

- c) That the impugned dismissal from service order is against the norms of justice, coram non iudice, without following the prescribed procedure which is sine-qua-non for dismissed from service. Therefore, the impugned dismissal from service order dated 03.01.2022 of the appellant is liable to be set-aside.
- d) That the matter related to the term and condition of service, therefore this Hon'ble tribunal has jurisdiction to entertain the appeal of the appellant under Article 212 of the Constitution of Islamic Republic of Pakistan 1973.

- e) That the service appeal is well within the period of limitation.

PRAYER:

It is prayed therefore humbly prayed that on acceptance of instant Service Appeal, impugned removal from service order No.13-19/R.R.F. dated 03.01.2022 may be set aside and respondents may graciously be directed to reinstate the appellant with all service back benefit. Any other relief which this Hon'ble Tribunal deem appropriate in the circumstances of the case may also be granted to the appellant.


...APPELLANT

Through Counsel:

Dated:- _____/2022


(**MUHAMMAD ARSHAD KHAN TANOLI**)
Advocate Supreme Court of Pakistan,
Abbottabad

Advocate
Office No. 22
Dett Bar

VERIFICATION:-

Verified that the contents of the instant Service Appeal are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- _____/2022


...APPELLANT

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KP
PESHAWAR.

Ishtiaq Khan

...APPELLANT

V E R S U S

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

...RESPONDENTS

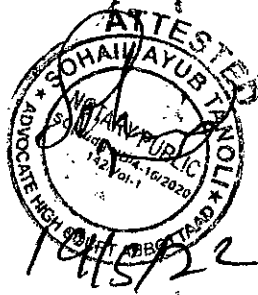
SERVICE APPEAL

AFFIDAVIT

I, Ishtiaq Khan Ex-HC Service No.4934, R/o Village Banda Said Khan
Tehsil and District Abbottabad, Appellant, do hereby solemnly affirm
and declare on Oath that the contents of instant Service Appeal are true
and correct to the best of my knowledge and belief and that nothing has
been concealed from this Hon'ble Tribunal.

Dated:- _____/2022


...APPELLANT



Annex-A

A 8

ORDER

As approved by the Recruitment Committee, constituted by the Provincial Police Officer, NWFP, Peshawar under the Chairmanship of Mr. Muhammad Tawaz-ul-Haq-Sipra, Capital Police Officer, Peshawar, the following candidate who have qualified and recommended for recruitment by the said Committee are hereby appointed as Constable in BPS-5 (Rs: 2100 - 100 - 5100) against the vacancies of P.R.P with effect from 20/21-10-2003, their appointed are purely on temporary basis and are liable to be terminated any time.

They are allotted P.R.P Constabulary Nos as noted against their name:-

S.NO	NAME	FATHER'S NAME	VILLAGE	EDU	ALLOTTED CONST. NO
1	AQHEEL AHILAM	M. YOUSAF	BERANGALI	10 th	1628
2	M. HANIF	ABDUL AZIZ	PANA	P. A.	1652
3	WASHEEM KHAN	ZARDAY KHAN	TALHAR	10 th	1874
4	M. ASIF	ALI ASGHAR	KRI RAKI	P. Sc	1730
5	ISHITIAQ KHAN	ZARIN KHAN	BANDA SAID KHAN	10 th	1609
6	ZAHID KHAN	MAMRIAZ KHAN	BATALA	10 th	1636
7	M. FAISAL	ALTAZ HUSSAIN	NANLI MAIRA	P. A.	1768
8	KAMRAN KHAN	SAJAWAL KHAN	BALDHERI	10 th	1683
9	JERAM ALI	MANZUOR ALI	KHARPER	10 th	1698
10	NAHEM ABUTAR	M. IRSHAD KHAN	BALDHERI	10 th	1594

B

ASi/SRC

No: 11528-29 dt 4-12-2003.

[Signature]
District Police Officer,
Abottabad.
4/12/2003

Copy of above is forwarded for information and necessary action to the:-

1. The Commandant PRP, NWFP, Peshawar.
2. The Senior Superintendent of Police, PRP, Region-II, Hazara Abottabad.

[Handwritten]
C/O No. 517
dt. 5-12-03

[Signature]
District Police Officer,
Abottabad

[Handwritten]
Attested

[Signature]

ORDER

As approved by Recruitment Committee Consultant to the Provincial Police Officer, NWFP Peshawar under the Chairmanship of Mr. Muhammad Daud ul Haq Siraj Capital Police Officer Peshawar in the following candidate who had qualified and recommended for appointment to vacancies of FRP which effect from 20/21-10-2003 their appointment was purely and temporary and are liable to be terminated any time.

They are allowed FRP Constabulary No is noticed against their names.

S. No	Name	Father Name	Village	Education	Allowed CONST No
1.	Aqeel Ahmad	M. Yousaf	Berangali	10 th	1698
2.	M. Hanif	Abdul Aziz	Pawa	F.A	1638
3.	Waseem Khan	Zardad Khan	Talihar	10 th	1871
4.	M. Asif	Ali Asghar	Kri Raiki	F.Sc	1730
5.	Ishtiaq Khan	Zarin Khan	Banda SaidKhan	10 th	1609
6.	Zahid Khan	Mamraiz Khan	Batala	10 th	1639
7.	M. Faisal	Altaf Hussain	Namli Maira	F.As	1768
8.	Kamran Khan	Sajawal Khan	Baldheri	10 th	1683
9.	Ikram Ali	Manzoor Ali	Kharper	10 th	1608
10.	Naeem Akhtar	M. Irshad Khan	Baldheri	10 th	1594

District Police Office,
Abbottabad

No: _____

Copy of above is forwarded for information and necessary action to the

1. The Consultant FPR, NWFP, Peshawar.
2. The Senior Consultant of Police, FPR, Region-II, Hazara Abbottabad.

District Police Office,
Abbottabad

Annex - B



Office of the Deputy Commandant
RRF, Khyber Pakhtunkhwa Peshawar.



No. 1188 /RRF

dated Peshawar the 26/07/2021

To: The Commandant,
Elite Force, Khyber Pakhtunkhwa, Peshawar.

P-10

Subject: APPLICATION FOR EX-PAKISTAN LEAVE.

Memo:

Enclosed please find herewith an application submitted by Head Constable Ishtiaq Khan No. 4934 of RRF Unit No. 16 district Manshra for Ex- Pakistan leave is forwarded for your kind perusal and further necessary action, please.

Muqbil
(ATTOULIAH WAZIR)
Deputy Commandant
RRF, Khyber Pakhtunkhwa
Peshawar.

Attested

Muhammad Aslam
Advocate High Court
Office No. 131 Edmundo St
Dera Ismail Khan

ضلع شیخوپورہ

P-10-A

پانچویں طبقہ کی عہدہ دار

جناب ایڈفٹ ایچ آر

کام نمبر 111/1993/4934/14/14

صرف ایک ہی درخواست کلاں منظور ہو چکا ہے۔
only one candidate

الحمد للہ

Government of Punjab
District Office No. 111/1993/4934/14/14
District

جناب عالی!

11/11/11

بروڈے بغرض اطلاع دینی اور سال خدمت سے

21/11/11
07

Handwritten signature and scribbles

**ZARAI TARAQIATI BANK LIMITED
HAVELIAN BRANCH**

P-11

NO.HVN/(GC-9)/2021/334

Dated: - 23.07.2021

TO WHOM IT MAY CONCERN

It is to certify that Mr. Ishtiaq Khan S/O Zareen Khan R/O Banda Said Khan, Tehsil & District Abbottabad (CNIC NO 13101-6677970-5) has not availed any credit facility from ZTBL, Havelian Branch.



(JAVED IQBAL)
MANAGER
JAVED IQBAL
Manager ZTBL
Havelian Branch

Attested



Office No. _____
Date: _____



OFFICE OF THE SUPERINTENDENT OF POLICE
ELITE FORCE/ RRF HAZARA REGION

P-12

No. 630 /EFH

Dated 14-07-2021

The Deputy Commandant,
Rapid Response Force Khyber Pakhtunkhwa.

APPLICATION FOR EX-PAKISTAN LEAVE.

Please find enclosed herewith application in respect of Head Constable Ishtaiq Khan
No. 4934 Rapid Response Force Unit No. 16 for consideration please.


Superintendent of Police
RRF/Elite Force, Hazara
Region Abbottabad

Attested



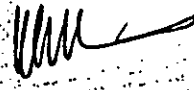
Office No. 34
Distt. Hazara Abbottabad

گزارش تمام سال کے جائیداد کے اور کچھ نجی معاملات میں جن سے
 P-13 کا وجہ سے سال ڈھونڈی کو تمام نہیں دیا یا دیا گیا ہے
 لہذا مذکورہ درخواستی تمام سال کو ایک سال کی
 پاکستان سے لیوری کا جائے تمام سال اپنے نجی کام
 حل کر سکے اور بعد میں اپنی ڈھونڈی اہل طری سے
 سرانجام دے سکے
 الفارہن

صدر کٹل اشتیاق خان مہ 4934 RRF یونٹ نمبر 16
 ماہیتہ پورہ

Siv Forwarded
 S/ptc U-16 RRF MA
 13-07-2021

Attested


 Advocate High Court
 Office No. 33 Adj. ...
 Dist. ...



**OFFICE OF THE SUPERINTENDENT OF POLICE
ELITE FORCE OF PUNJAB REGION**

No. 677 - JEPH

Dated 27-07-2011

To: **The Deputy Commandant,
Rapid Response Force Khyber Pakhtunkhwa.**

P-14

Subject: **APPLICATION FOR EARNED LEAVE.**

Please find enclosed herewith application in respect of Head Constable Ishaq Khan
No. 4914 Rapid Response Force Unit No. 16 for consideration please.

[Signature]
Superintendent of Police,
RPF/ Elite Force, Peshawar
Region Abbottabad

Attested

[Signature]

گذشتہ دنوں کے سائل کا خلاصہ

یہ سائل زبردستی سے حل کیے گئے ہیں۔

سائل کی مدد سے حل کیے گئے ہیں۔

حکم رقم 04 مہ 05 کی روشنی میں جاری کیا گیا ہے۔

سائل کے حل کے لیے توجہ دینی۔

العارض

انتظامیہ خان، 4934 پونٹ 16

مدیر، پولیس سٹیشن، ضلع مانسہرہ

He. RRP-11-16

Forward

SI PG RRP-11
05.07.2021

Attended

[Signature]

Office No. 332



Annex-C

**Office of the Deputy Commandant
RRF, Khyber Pakhtunkhwa Peshawar.**



No. 13-19 /RRF

Dated: 03/01/2022.

ORDER

P-16

HC Ishtiaq Khan No. 4934 while posted at RRF Unit No. 16 Manshra absented himself from his lawful duty without any leaver or prior permission from his seniors w.e.from 28.07.2021 till date.

In this regard proper departmental enquiry was initiated against him and SP Elite/RRF Hazara Region was appointed as enquiry officer. During the course of enquiry the accused official failed to appear before the enquiry officer.

The Enquiry Officer submitted his findings and stated that the accused official had gone abroad i.e. (Qatar) without NOC or permission from the High Ups. The Enquiry Officer also verified from FIA Authority vide letter No. FIA/IBMS/Police/Query/4901 dated 01.11.2021, which was confirmed that in fact he has been gone to abroad (Qatar). Hence the Enquiry Officer recommended him for ex-part action during enquiry.

A Final Show Cause Notice was issued to him by this office vide No. 4086/RRF, dated 04.11.2021 and served upon the real brother of the accused official namely Afzal Hakeem MHC at Police Station Mirpure District Abbottabad and his signed was received on the back side of the Final Show Cause Notice.

Therefore, I, Ihsan Ullah Khan Deputy Commandant RRF, Khyber Pakhtunkhwa, Peshawar as Competent Authority awarded him the major punishment of "DISMISSAL FROM SERVICE" with immediate effect and his period of absence w.e.from 28.07.2021 till to date is also treated as leave without pay under the Police Rules 1975.

OB No 01
Date 03/01/2022

(IHSAN ULLAH) PSP
Deputy Commandant
RRF, Khyber Pakhtunkhwa Peshawar.

Copy of the above is forwarded for favour of information to the:-

1. Worthy Addl: IG/Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commandant Elite Force, Khyber Pakhtunkhwa, Peshawar.
3. District Police Officer, Abbottabad.
4. SP RRF Peshawar Region, Peshawar.
5. SP, Elite/RRF Hazara Region with reference his office letter No. 1216 E/F, dated 01.11.2021.
6. Accountant, RRF, Peshawar is strictly directed to recover the salaries of his absence period.
7. *SP/RRF Hazara Region*

Allesed
RRF

ذریعہ ضابطہ گائڈنس RRF ایڈیٹڈ فورس سٹارڈ

Annex-D

رہنمائی کے مقاصد کے لیے OBI جو غیر قانونی طور پر جاری کیا گیا

03-01-2022

P-17

ضابطہ عالی

کہ مائل حکم صدر میں لکھور میں کتب خانوں کے خلاف سرکاری دبیاریا سے

کہ ہم مائل نے نہ گورنر کی مداخلت کی وجہ سے $26 \frac{7}{2021}$ سے 4 مہینے باضابطہ لی ہے۔

(3) ہم مائل کو غیر قانونی طور پر $28 \frac{7}{2021}$ کو روک دیا اور RRF 13-19 کو غیر قانونی طور پر برخواست کر دیا گیا ہے۔

3-1-2022

جو قابل منسوخ ہے۔

کہ ہم مائل کو لکھور میں گورنر اور ریاستی سطح پر مائل کے خلاف لکھور میں برخواست کیا گیا جو سرسبز مائل کے خلاف واقعات پورے مائل پر کالعدم ہونے کے باعث ہے

اندر ہی حالات استدعا ہے کہ غیر قانونی ضابطہ RRF 13-19 کو منسوخ

03-01-2022

ذریعہ ضابطہ RRF 4934 جو 116 کے تحت 31-1-2022

Attested

Handwritten signature

کدوٹ فیس

وکالت نامہ

Service Tribunal KPR Peshawar

Ishtiaq Ahmad

Govt of KPR

Appellant

Service Appeal

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب وہی کل کاروائی متعلقہ آل مقام

Abbottabad M. Arshad Khan Tanoli A.S.C

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقریر ثالث و فیصلہ بر حلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقریر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت ناش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند ہے۔

الموقع:

Abbottabad

بمقام:

Accepted

M. Arshad Khan Tanoli

A.S.C of Pakistan

"B"

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

TB A/Abad.

No.

Appeal No. 929 of 20 22

Ishtiaq Khan Appellant/Petitioner

Versus

Through Secy: Home & T A Respondent

Respondent No. 1

Notice to: Govt of KPK through Secretary
 Home & T A Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 14-11-22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 3

Day of 10 20 22

of camp court
 A/Abad.


 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

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

No.

TB A/Abcd

Appeal No. *929* of 20 *22*

Ishtiaq Khan Appellant/Petitioner

Versus

Through Secy: *Horie* Respondent

Respondent No. *2*

Notice to: *Inspector General of Police (IGP)*
Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on *14/11/22* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this *3*

Day of *10* 20 *22*

At Camp Court
A/Abcd

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

147/022

"B"

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

TB A/Abad.

No.

Appeal No. *929* of 20 *22*

Ishtiaq Iqbal Appellant/Petitioner

Versus
Through Secy: Home Respondent

Respondent No. *3*

Notice to: *Deputy Commandant FRP Peshawar*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on *14-11-22* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this *3*

Day of *10* 20 *22*

*at Camp Court
A/Abad.*

18/10/22
Office of the Adl. JSP/Comp. Secy
F.R.P. K. Peshawar
Diary No. *18/10/22*

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

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

TB AIAbad.

Regd
No. /

Appeal No. 929 of 20 22

Istiaq Khan Appellant/Petitioner

Versus

Inoogh Secy- Home Respondent

Respondent No. 5

Notice to:

District Police Officer (DPO)
AIAbad.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 14-11-22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.dated.....

Given under my hand and the seal of this Court, at Peshawar this 3

Day of 12.20 22

at camp Court
AIAbad.

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No. *Resd*

TB A/Abad.

Appeal No. *929* of *2022*

Ishfaq Khan Appellant/Petitioner

Through Secy: HOD/1 Respondent

Respondent No. *4*

Notice to: *RPO Hazara Range A/Abad*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on *14-11-22* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this *3*

Day of *10* 20 *22*

*at camp court
A/Abad.*

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