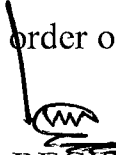


Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1600/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/11/2022	<p>The appeal of Mr. Javed Iqbal resubmitted today by Syed Mudassir Pirzada Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR <i>ub</i></p>

The appeal of Mr. Javed Iqbal LHC no. 70 investigation Branch PS MRS Kohat received today i.e. on 1.11.2022 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Copy of promotion order mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 3- Appeal has not been flagged/marked with annexures marks.
- 4- Two more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal. generate

No. 3101 /S.T,

Dt. 01/11 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Syed Mudasir Pirzada Adv. Kohat.

Re-Submitted after  
removal of office  
objection including  
attached promotion  
list which shows  
as seniority list/Promotion  
10/11/22 Javed

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 1600 2022

Javed Iqbal LHC No .70 Investigation Branch PS MRS Kohat

(Appellant)

VERSUS

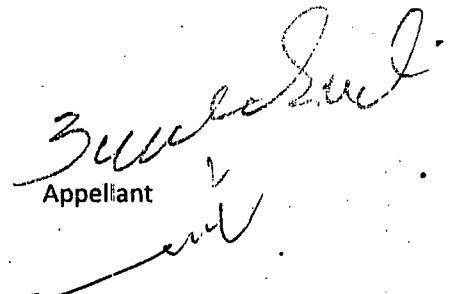
1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

INDEX

Sr No	Description of Documents	Annexure	Page
1	Memo of Appealed		1-3
2	Affidavit		4
3	Address of the Parties		5
4	(Copy of order and promotion courses annexed as annexure A)	A	6-9
5	Copy of Seniority list of LHCs annexed as annexure B)	B	10-11
6	Copy of Impugned seniority list is annexed as annexure C)	C	12-15
7	Copy of Impugned order and representation with rejection order is annexed as annexure D)	D	16-21
8	Copy of standing order is annexed as annexure E)	E	22-25
10	Wakalt Nama		26

Through

Date 1 / 1 / 2022

  
Appellant  
Syed Mudasir Pirzada

Advocate HC

0345-9645854

①

**BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.**

Service Appeal \_\_\_\_\_ 2022

Javed Iqbal LHC No .70 Investigation Branch PS MRS Kohat .

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 19-09-22 No.8650/SRC dated Kohat IN WHICH THE NAME OF THE APPELLANT WAS REMOVED FORM THE SENIORITY LIST BY RESPONDENT NO:-3 WITHOUT ANY LAWFUL COGENT REASON ,FEELING AGGRIEVED PREFERRED DEPARTMENTAL REPRESENTATION DATED 26-09-22 BUT THE SAME WAS REJECTED ON 12-10-22.**

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following grounds:-

**Facts:**

Briefly facts are as per record that the appellant was enrolled as constable in the FRP Police Kohat on 11-08-2009 and in the year 2014 the appellant on the basis of Mutual Transfer as per NOC transferred from the FRP –Police Kohat to Regular Dirtrict Police and qualified all necessary and mandatory courses for promotion while during service in Kohat Police (Copy of order and promotion courses annexed as annexure A).

That the Respondent No. 3 in the year 2016 fixed the seniority of those qualified candidates who have qualified the lower college course and the appellant name was also enlisted vide serial No.251 and then after a list pertaining to qualified lower course candidate from 2018 to 2022 appellant was not consider in seniority

2

list and appellant name was placed at serial No-136. **(Copy of Seniority list of LHCs annexed as annexure B)**

That another seniority list of LHC was prepared and published in which the name of the appellant would have to be placed at serial No.118 but astonishingly the name of appellant was removed from the seniority list without any sufficient cause. **(Copy of Impugned seniority list is annexed as annexure C)**

That the appellant feeling aggrieved from the impugned order preferred departmental representation which was also rejected and the appellant has no option except Honourable tribunal for speedy justice and redressal of appellant's grievance on the following grounds inter -alia. **(Copy of Impugned order and representation with rejection order is annexed as annexure D)**

**Grounds:**

- a. That the impugned order of respondent No 3 is not in accordance with the law, rules and principle of justice which needs urged consideration and liable to be set aside .
- b. That it is an admitted fact that seniority is hard earned by an official / officer and such hard earned seniority cannot be taken away by a stroke of pen.
- c. That it is establish form the service record of the appellant that appellant with the approval of the worthy officer was transferred from FRP -Police Kohat to Disrtict Police Kohat.
- d. That the appellant while transferred from FRP Kohat to District Police qualified all necessary exams and courses and there is no justification to remove the name of the appellant from the seniority list and the respondents No-3 took the cover of standing order of 2016 **(Copy of standing order is annexed as annexure E)**
- e. That the standing order reveals that it was enforced with immediate effect but unfortunately the said standing order was used and enforced with the retrospective effect.
- f. That enforcing standing order No.02/2016 with the retrospective effect and making the appellant victim of the said standing order is neither legal nor justified and the appellant has been made victim of the standing order which is not applicable to the appellant as the appellant does not fall within the ambit of standing order.
- g. That the respondent No-3 without any lawful justification removed the name of the appellant as the appellant after joining District Police never remain in any other district and tenders good service it is also worth

3

mentioning here that other officer of identical nature qualified all necessary and mandatory courses and promoted and still in District Police Kohat.

- h. That the appellant is still unable to realize that what element appealed to the mind of respondent No 3 for issuing of impugned order.
- i. That the appellant dragged unnecessarily into litigation which is clearly mentioned in superior courts guidelines.
- j. That the impugned order is not based on sound reasons and same is not sustainable in the eyes of law. The same is based on wrong assumption of facts.
- k. That the impugned order is outcome of surmises and conjecture.

Pray:

In the view of above circumstances it is humbly prayed that the impugned order of respondent No.3 may graciously please be set aside for the end of justice and directions for inclusion of name of appellant in the list of LHCs seniority list of District Police Kohat may kindly be issued and the appellant may be placed along with his colleagues (Batch mates) i.e. below the name of Muhammad Waqas at serial No-117 of seniority list of June 2022 with all consequential benefits in the larger interest of justice or blessed with any suitable remedy as Honourable tribunal deem fit.

Date 1/11/2022

Through

  
Appellant

Syed Mudasir Pirzada

Advocate HC

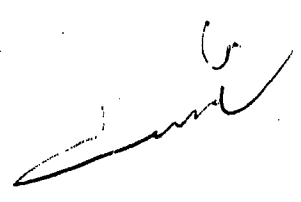
0345-9645854

Certificate:-

Certified that no such like appeal has earlier been filed in this Hon able Service tribunal as per instruction of my client.

List of Books

- 1:- Constitution of Pakistan 1973
- 2:- Police Rules
- 3:- Case Law according to need.



4

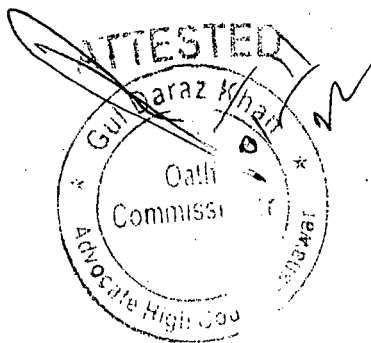
BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal \_\_\_\_\_ 2022

AFFIDAVIT

I, Syed Mudasir Pirzada Advocate  
as per instruction of my client do  
here by solemnly affirm and  
declare that all the contents of  
accompanying service appeal are  
true and correct to the best of my  
knowledge and belief and nothing  
has been concealed from this  
Honorable Tribunal.

  
Advocate



5

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Javed Iqbal LHC No .70 Investigation Branch PS MRS Kohat

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

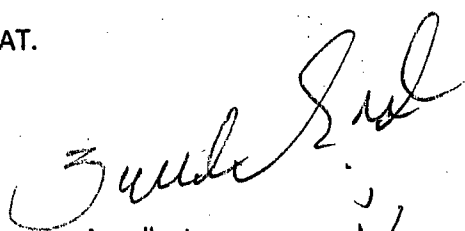
ADDRESS OF THE PARTIES

APPELLANT :-

Javed Iqbal LHC No .70 Investigation Branch PS MRS Kohat

RESPONDENTS

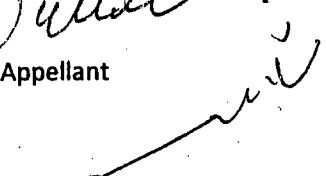
1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT.



Appellant

Through

Date 01 / 11 / 2022

  
Syed Mudasir Pirzada

Advocate PHC

0345-9645854



(Amesine P-9) (A) B (6)

CHARACTER ROLL OF

(Continued)

Serial No

14. COMMENDATORY ENTRIES

"Passed The lower college course"

passed The subject course ride commandant

PTC Hanga notification no-2128-65/s dated-27-10-65

Terms ending 31-3-15

(History sheet is attached)

District Police Officer Kohlt

ATTESTED

E-IV

2

de l

14. COMMENDATORY ENTRIES

ORDER

Transfer to District Police Kohat  
vide P.P.O KPK Peshawar order Endst No 449-52/E-11  
dated 9-1-2015.

11 <sup>08</sup> 31 <sup>12</sup>  
service from 2009 to 14  
Has been verified from the pat  
Bills & Acquittance Roll kept in  
this Office.

*[Signature]*  
Superintendent of Police.  
F.P. Kohat Range,  
Kohat

*[Signature]*  
Supdt of Police  
G.R.P. Kohat Range

Pass B-1 and selected for Lower course

Passed the subject exam under the supervision  
of S.P.A dated 15.03.15 and selected  
for lower course vide DGP order and the  
22-11-14 dated 07.03.15

*[Signature]*  
District Police Officer  
Kohat

TRANSFER ORDER

Transferred to Investigation wing, Kohat vide  
W/DIA Kohat order Endst No 4061-66/EC dated  
11-4-2016

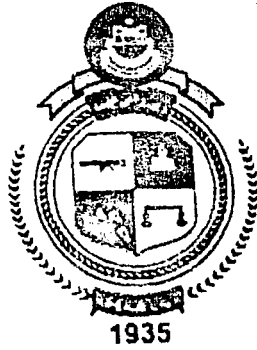
*[Signature]*  
For District Police Officer  
Kohat

*[Signature]*  
ATTESTED

Serial No

PTC  
Terms

# Police Training College Hangu

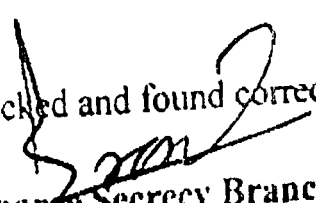



## PERFORMANCE REPORT

Term Starting	: 01.04.2015	Term Endng	: 31.07.2015
College Course	: Lower	Name	: Javed Iqbal
District/Unit	: Kohat	Comp#	: L-5589
Belt No.	: 1149	Company	: Suleman
Education	: BA	Merit	: 159

Subjects	Marks obtained	Marks allotted	Subjects	Marks obtained	Marks allotted	Remarks
<b>Paper No: I</b>			Parade	24	50.00	Declared Passed.
PPC	284	/400.00	PT	16	30.00	
PR			FC	20	50.00	
MJ			DPA	32	70.00	
Ist			A.Fire SMG	196	200.00	
<b>Paper No: II</b>			S.Fire	44	100.00	
CrPC	293	/400.00	AC	61	110.00	Overall %age is: 67.60
LSL			R.On P.O's	15	30.00	
FC			Ambush	15	30.00	
PPWP			Naka Bandi	14	30.00	
PFW			<b>Total</b>	<b>437</b>	<b>700.00</b>	
<b>Total</b>	<b>577</b>	<b>/800</b>				
<b>Grand Total 1014 / 1500.00</b>						

Comments: - Good

Checked and found correct.  
  
 Incharge Secrecy Branch

  
 Controller of Examinations  
 For Commandant,  
 Police Training College Hangu.

**ATTESTED**

9 13 24

2015  
09/01/2015

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

**ORDER**

Mutual transfers/postings of the following lower subordinates of Khyber Pakhtunkhwa Police are hereby ordered with immediate effect:-

S#	Names & No.	From	To
1.	Constable Javed Iqbal No. 44	FRP Kohat Range	District Police Kohat
2.	Constable Muhammad Kashif No. 77	District Police Kohat	FRP Kohat Range

76  
23/1/15

OHC/SP/RC/150

For information

*(Signature)*

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

No. 449-52 /E-IV dated Peshawar the 09/01/2015

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

1. Addl: IGP/ Commandant FRP Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police, Kohat Region.
3. District Police Officer, Kohat.
4. SP/FRP Kohat Range w/r to his letter No. 48/EC, dated 06.01.2015.

Superintendent of Police,  
FRP Kohat Range,  
Kohat

no 465 /EC dt 13/01/2015

copy of above is forwarded for information and necessary action

forwarded to the SP FRP Kohat Range

*(Signature)*  
08/02/2015

**ATTESTED**

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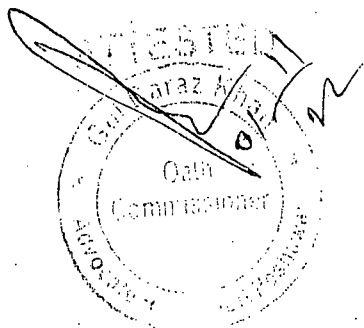
BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal \_\_\_\_\_ 2022

AFFIDAVIT

I, Syed Mudasir Pirzada Advocate  
as per instruction of my client do  
here by solemnly affirm and  
declare that all the contents of  
accompanying service appeal are  
true and correct to the best of my  
knowledge and belief and nothing  
has been concealed from this  
Honorable Tribunal.

  
Advocate



Annexure B (10) 2016

**SENIORITY LIST OF LOWER CONSTABLES for the year 2016**

No	Name & No	D.O.B	D. Appoint	Edu	D. O.Prom	Remarks
1.	Gulab Ali 174	01.10.77	13.04.01	10 <sup>th</sup>	25.07.07	LHC
2.	Muhammad Uzair 594	04.03.82	15.03.01	10 <sup>th</sup>	25.07.07	
3.	Aqeel Hussain 1051	31.12.75	23.07.98	FA	25.07.07	
4.	Zahoor Ahmad 636	25.12.74	07.06.95	10 <sup>th</sup>	25.07.07	
5.	Waheed Shah 1029	15.10.74	01.01.94	10 <sup>th</sup>	25.07.07	
6.	Gulab Din 242	18.09.74	10.12.94	FA	25.07.07	
7.	BaSher Hussain 608	25.12.74	28.11.94	FA	25.07.07	
8.	Mubarak Hussain 18	15.12.74	13.12.94	FA	25.07.07	
9.	Musawir Shah 553	01.02.78	03.05.01	FA	25.07.07	
10.	Gula Mir 972	09.05.72	21.09.91	10 <sup>th</sup>	25.07.07	
11.	Wali Bar Shah 521	04.01.75	11.01.99	10 <sup>th</sup>	30.11.07	
12.	Saeed Ullah 130	15.03.75	11.01.99	10 <sup>th</sup>	30.11.07	
13.	Azmat Ali 767	05.01.78	15.03.01	10 <sup>th</sup>	30.11.07	
14.	Janishair Baza 417	10.04.80	11.03.01	BA	30.11.07	
15.	Mukhtiar Khan 668	12.03.75	03.07.94	FA	30.11.07	
16.	Farid Ullah 1122	01.01.81	14.04.01	10 <sup>th</sup>	30.11.07	
17.	Muhammad Rafiq 586	16.01.82	13.03.01	10 <sup>th</sup>	30.11.07	
18.	Mukhtiar Hussain 672	15.10.80	05.04.99	10 <sup>th</sup>	30.11.07	
19.	Munadiq Hussain 962	01.03.75	08.09.96	10 <sup>th</sup>	30.11.07	
20.	Shamshad Ahmad 566	12.01.75	29.07.98	FA	30.11.07	
21.	Noor Khan 762	06.04.75	24.02.99	10 <sup>th</sup>	30.11.07	
22.	Munozir Ali 313	23.01.83	27.07.01	10 <sup>th</sup>	30.11.07	
23.	Ahmad Khan 1165	25.01.79	11.01.99	BA	20.09.08	
24.	Asmat Ullah 1114	04.10.79	10.02.02	BA	20.09.08	
25.	Sadaqat Ali 1083	05.07.79	15.03.01	10 <sup>th</sup>	20.09.08	
26.	Khalil Ur Rehman 65	10.04.79	27.02.99	10 <sup>th</sup>	20.09.08	Lien transfer to District Mardan
27.	Siraj Khan 268	07.03.82	11.03.01	FA	20.09.08	
28.	Intizar Ali 717	14.09.77	15.11.95	10 <sup>th</sup>	20.09.08	
29.	Mukhtiar Ahmad 395	01.04.79	11.03.01	BA	20.09.08	
30.	Haseeb Ullah 702	15.03.79	11.03.01	FA	20.09.08	
31.	Sajjad Khan Afridi 968	20.03.78	15.03.01	FA	20.09.08	HC Peshawar Distt:
32.	Muhammad Yousaf 957	02.06.80	11.03.01	FA	20.03.09	
33.	Ayub Khan 424	16.03.81	11.03.01	10 <sup>th</sup>	20.09.08	
34.	Tanveer Hussain 598	15.04.81	18.04.01	10 <sup>th</sup>	20.09.08	
35.	Dastan Ali 325	01.05.77	22.10.98	10 <sup>th</sup>	20.09.08	
36.	Caizer Hussain 669	30.04.82	16.04.01	10 <sup>th</sup>	20.09.08	
37.	Muhammad Saeed 1157	02.12.81	15.03.01	10 <sup>th</sup>	20.09.08	
38.	Noor Khan 155	12.06.77	14.07.98	10 <sup>th</sup>	20.09.08	
39.	Abdul Majeed 706	26.05.77	11.03.01	FA	20.03.09	
40.	Ibrahim 1033	04.03.81	15.03.01	FA	20.09.08	
41.	Muhammad Shoaib 845	18.06.76	10.01.94	10 <sup>th</sup>	2008	HC From Hangu 14.03.09
42.	Fahad Ali 146	03.01.81	11.03.01	10 <sup>th</sup>	20.03.09	
43.	Saeed Khan 83 (SB)	28.03.77	01.10.01	10 <sup>th</sup>	20.09.09	
44.	Muhammad Younis 1130 (EF)	10.03.82	14.02.02	FSC	20.09.09	
45.	Muhammad Ayaz 1043	01.04.82	10.02.02	FA	20.09.09	
46.	Anwar Ali 950 (EF)	04.03.78	10.02.02	FA	20.09.09	
47.	Muhammad Haroon 879	08.03.82	10.03.01	10 <sup>th</sup>	20.09.09	
48.	S. Muhammad Qasim 277	12.04.81	16.02.02	FA	20.09.09	
49.	Waheed Ullah 622	11.02.80	16.01.99	FA	20.09.09	
50.	Gulshan Iqbal 617	27.12.79	11.03.01	10 <sup>th</sup>	20.03.10	
51.	Shafiq Hussain 86	05.02.82	10.02.02	10 <sup>th</sup>	20.03.10	
52.	Atiq Rehman 688	10.05.77	11.03.01	BA	20.03.10	
53.	Sher Yar 884	15.02.81	10.02.02	10 <sup>th</sup>	20.03.10	
54.	Nadeem Haider 1056	02.01.81	10.02.02	FA	20.03.10	
55.	Abbas Ali 1167	27.01.82	21.06.01	FA	20.03.10	
56.	Muhammad Shoaib 1159	11.05.77	15.03.01	FA	20.03.10	
57.	Lamar Hayat 274/EF	18.06.82	02.05.01	10 <sup>th</sup>	20.03.10	

**ATTESTED**

11

239.	Muhammad Asghar 17/FRP			31.07.15	
240.	Muhammad Shoaib 4256/EF			31.07.15	
241.	Kashif Rehman 4241/EF			31.07.15	Re-Appeared
242.	Noor Ul Islam 4195/EF			31.07.15	
243.	Riasat Ali 4208/EF			31.07.15	
244.	Hazrat Bilal 1430/EF			31.07.15	
245.	Syed Mir Jan 593			31.07.15	Re-Appeared
246.	Muhammad Sajjad 4240/EF			31.07.15	
247.	Muhammad Ghayas 215			31.07.15	Re-Appeared
248.	Saif Ullah 86			31.07.15	
249.	Wajid Muhammad 36			31.07.15	
250.	Muhammad Waqas 374			31.07.15	
251.	Javed Iqbal 1149			31.07.15	
252.	Zain Ullah 1279			31.07.15	
253.	Wajid Khan 1491/EF			31.07.15	Re-Appeared
254.	Jannat Gul 108			31.07.15	
255.	Naveed Gul 1586/EF			31.07.15	Re-Appeared
256.	Mugh Din Shah 4244/EF			31.07.15	
257.	Muhammad Naseer Khan 4237/EF			31.07.15	Re-Appeared
258.	Sajjad Ahmed 4115/EF			31.07.15	Re-Appeared
259.	Anzar Shah 1596/EF			30.11.15	
260.	Muhammad Aurangzeb 1596/EF			30.11.15	
261.	Amir Aman 185			30.11.15	
262.	Muhammad Tahir 619			30.11.15	
263.	Muhammad Tahir 57			30.11.15	
264.	Rehamn Hanif 1302			30.11.15	
265.	Hadeem Khan 4239/EF			30.11.15	
266.	Munsif Khan 4201/EF			30.11.15	
267.	Muhammad Riaz 1557/EF			30.11.15	
268.	Attab Ahmed 1318			30.11.15	
269.	Muhammad Arif 3317/EF			30.11.15	
270.	Rehmat Ullah 49			30.11.15	

  
**ATTESTED**

Amnecur C

(#)

### TENTATIVE SENIORITY LIST OF LHCS WITH EFFECT FROM TERM ENDING DATE 31.07.2014.

جن ایس آر اے کو لوئر سینیورٹی لیٹ پر کوئی اعتراض ہو تو وہ تحریری درخواست SRC/OHC آفس میں اتر میعاد 7 یوم میں جمع کرانیں۔ تاکہ لمب فائنل ہو سکے۔

پیدائشی سرٹیفکیٹ  
سال 2022  
سوائے کا  
2016  
کراچی

S/No.	Name & No.	D.O.B	D. O. A	Edu	D.O. Lower Passed	Remarks
1.	Hidayat Ullah 881 / 98	12.04.1979	11.3.2001	FA	20.03.2013	Awarded punishment reduction from the Rank of LHC to I Constable vide OB No.294 dated 17.10.2019. His case is u litigation, hence, not approved.
2.	Faiz Noor 4236/EF	12.02.1987	26.07.2007	10 <sup>th</sup>	31.07.2014	
3.	Shahid Noor 1499/CTD	25.01.1981	06.06.2007	BA	31.07.2014	
4.	Sheran Gul 1498/CTD	10.09.1985	06.06.2007	FA	31.07.2014	
5.	Aftab Ahmed Khan 79/30/KBI	01.04.1989	26.07.2007	10 <sup>th</sup>	31.07.2014	
6.	Amir Muhammad 698	25.02.1976	13.12.1994	10 <sup>th</sup>	31.07.2014	
7.	Sabeel Muhammad 537	25.05.1983	25.06.2007	10 <sup>th</sup>	31.07.2014	
8.	Muhammad Bilal 565				31.07.2014	
9.	Zaheer Shah 1561/EF / 36	05.12.1985	06.06.2007	10 <sup>th</sup>	31.07.2014	Dismissed
10.	Atif Khan 74/KT	05.04.1986	19.06.2008	10 <sup>th</sup>	31.07.2014	
11.	Farhan Shah 1519/EF 1001				31.07.2014	Present posting FRP Kohat
12.	Iqbal Khan 45/KBI 339/KT	17.03.1978	20.02.2004	BA	31.07.2014	
13.	Ahmed Khan 36/ 233	24.10.1984	06.06.2007	FA	31.07.2014	
14.	Noor Shoaib 1598/EF 1222	15.04.1986	02.06.2006	10 <sup>th</sup>	31.07.2014	
15.	Muhammad Abid 1534/EF 675	02.03.1987	23.06.2007	FA	31.07.2014	
16.	Zaheer Shah 1524/EF 136	03.05.1981	02.06.2006	10 <sup>th</sup>	31.07.2014	
17.	Abbas Haider Mir 49/ 535	29.05.1988	23.06.2007	BA	31.07.2014	
18.	Sher Nawaz 1590/EF 345	18.07.1985	02.06.2006	FA	31.07.2014	
19.	Muhammad Kamran 1328/CTD	31.12.1987	06.06.2007	FA	31.07.2014	
20.	Yasir Mehmood 1527/EF 1058	03.06.1987	23.06.2007	10 <sup>th</sup>	31.07.2014	
21.	Habib Ullah Shah 4199/EF				31.07.2014	
22.	Danish Rehman 1170/EF 413	23.12.1982	20.10.2004	10 <sup>th</sup>	31.07.2014	
23.	Darvish Khan 1582/1110/CTD	12.04.1982	02.06.2006	10 <sup>th</sup>	31.07.2014	
24.	Muhammad Shabir 1556/EF 597	09.02.1979	02.06.2006	10 <sup>th</sup>	31.07.2014	

RECEIVED




113.	Muhammad Sajjad 4240/EF				31.07.2015	
114.	Muhammad Ghayas 215/KT	01.08.1983	13.03.2004	10 <sup>th</sup>	31.07.2015	Re-Appeared
115.	Saif Ullah 86				31.07.2015	
116.	Wajid Muhammad 36/FRP				31.07.2015	
117.	Muhammad Waqas 374/KT	19.09.1988	01.06.2009	BA	31.07.2015	
118.	Wajid Khan 607/KT	23.03.1986	02.06.2006	10 <sup>th</sup>	31.07.2015	Re-Appeared
119.	Jannat Gul 108/KT				31.07.2015	
120.	Naveed Gul 1586/EF 386				31.07.2015	Re-Appeared
121.	Mugh Din Shah 4244/EF				31.07.2015	
122.	Muhammad Naseer Khan 4237/EF				31.07.2015	Re-Appeared
123.	Sajjad Ahmed 4115/EF				31.07.2015	Re-Appeared
124.	Anwar Shah 1596/EF, 565/KT	17.05.1986	02.06.2006	10 <sup>th</sup>	30.11.2015	
125.	Muhammad Amrangazeb 1596/EF				30.11.2015	
126.	Muhammad Tahir 619				30.11.2015	
127.	Muhammad Tahir 57/KBI / 634/KT	13.06.1978	25.03.1999	10 <sup>th</sup>	30.11.2015	
128.	Rehman Hanif 1302/KT				30.11.2015	
129.	Nadeem Khan 4239/EF				30.11.2015	
130.	Munsif Khan 4201/EF				30.11.2015	
131.	Muhammad Riaz 1557/EF 460	21.04.1976	02.06.2006	10 <sup>th</sup>	30.11.2015	
132.	Aftab Ahmed 1318/KT	15.12.1981	27.10.2003	FA	30.11.2015	
133.	Muhammad Arif 3317/EF				30.11.2015	
134.	Rehmat Ullah 49				30.11.2015	
135.	Atif Naeem 4233 /EF, 1346/KT	18.04.1986	26.07.2007	10 <sup>th</sup>	31.03.2016	
136.	Wajahat Ali 1338 /EF				31.03.2016	Check
137.	Zahoor Khan 73 /FRP				31.03.2016	
138.	Gul Sharaf 2224				31.03.2016	
139.	Majid Islam 1515 /EF 1224				31.03.2016	
140.	Sami Ullah 3491				31.03.2016	
141.	Hashim Khan 220/EF 96				31.03.2016	
142.	Nadeem Khan 4229/EF 429				31.03.2016	
143.	Noor Nawaz 20	14.04.1989	06.08.2007	10 <sup>th</sup>	31.03.2016	
144.	Tamjeed ur Rehman 4202/EF				31.03.2016	

ATTES

نوٹ: 117 کی جگہ پر  
محمد نواز خان

Seniority List Dated 2018 To 2022 ✓

119.	Khursheed Ahmed 1011				31.03.15	
120.	Noor Kalam 4231/EF				31.07.15	
121.	Shamsher Haider 4222/EF				31.07.15	Re-Appeared
122.	Muhammad Mujahid 1086	07.10.1981	02.06.2006	10 <sup>th</sup>	31.07.15	Re-Appeared
123.	Noor Ullah 1005				31.07.15	Re-Appeared
124.	Muhammad Asghar 17/FRP	04.02.1977	02.06.2006	10 <sup>th</sup>	31.07.15	
125.	Muhammad Shoaib 4256/EF				31.07.15	
126.	Kashif Rehman 4241/EF				31.07.15	Re-Appeared
127.	Noor Ul Islam 4195/EF				31.07.15	
128.	Riasat Ali 4208/EF				31.07.15	
129.	Hazrat Bilal 1130/EF	KARAK			31.07.15	
130.	Syed Mir Jan 593				31.07.15	
131.	Muhammad Sajjad 4240/EF				31.07.15	Re-Appeared
132.	Muhammad Ghayas 215				31.07.15	
133.	Saif Ullah 86				31.07.15	
134.	Wajid Muhammad 36				31.07.15	
135.	Muhammad Waqas 374				31.07.15	


  
**ATTESMED**

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136	Javed Iqbal 1149	Transfer to <sup>KOHAI</sup> <del>Bank district</del>			31.07.15	
137	Zain Ullah 1279	12-01-2022 Source of			31.07.15	
138	Wajid Khar 507		23.03.1986	02.06.2006	10 <sup>th</sup>	31.07.15 Re-appeared
139	Fannat Gul 108					31.07.15
140	Naveed Gul 1586/EF 386					31.07.15 Re-appeared
141	Mugh Din Shah 4244/EF					31.07.15
142	Muhammad Naseer Khan 4237/EF					31.07.15 Re-appeared
143	Sajjad Ahmad 4115/EF					31.07.15 Re-appeared
144	Zara Bibi 1509					30.11.2015 Cadet
145	Anwar Shah 1596/EF 565					30.11.15
146	Muhammad Aurangzeb 1596/EF					30.11.15
147	Amir Amir 185	Line collected with 1 property				30.11.15 Karak FRP Karak
148	Muhammad Fahir 619					30.11.15
149	Muhammad Fahir 57KBI/634kt					30.11.15
150	Rehman Hanif 1302					30.11.15
151	Nadeem Khan 4239/EF					30.11.15
152	Munsif Khan 1201/EF					30.11.15

ATTESTED  
 S



(Annexure D)  
OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

Tel: 0922-9260116 Fax: 9260125

No. 1 /SRC dated Kohat the 18/8 /2022.

To: The District Police Officer,  
Karak.

Subject: SENIORITY FIXATION.

Memo: -

It is submitted that LHC Javed Iqbal No.70 of this district police, presently serving in Investigation Wing, Kohat resident of Kote Kale District Karak was enlisted on 11.08.2009 in FRP Kohat Region Kohat vide SP FRP Kohat Range, Kohat OB No.448 dated 11.08.2009.

He passed recruit course at PTC Hangu for the term ending 20.09.2010 vide SP FRP OB No.457 dated 31.12.2010. He passed A-1 exam through ETEA vide SP FRP Kohat OB No.220 dated 19.05.2014. He transferred from FRP Kohat to Operation Staff Kohat vide IGP KP Peshawar Order Endst: No.449-52/E-IV dated 09.01.2015. He passed B-1 exam through ETEA from Kohat and selected for lower School Course vide RPO Kohat Order Endst: No. 2211-14 dated 27.03.2015 and qualified on 31.03.2015.

According to Standing Order No.02/2016 at Para No. 01 *that all personnel serving in the central Units will be on deputation from concerned District and Regions and their lien will be in their parent District /Region. If in the past any recruitment has been carried out directly in the central units and lien of such recruits has not been fixed so far; it will be fixed in District of domicile of the concerned recruit.*

Therefore in view of above standing order his application is sent herewith for fixation of his seniority in district Karak with his colleague in the term ending 31.07.2015, please.

(MUHAMMAD SULEMAN) PSP  
District Police Officer,  
Kohat

✓ No. 8650 /SRC,

Copy of above is sent for information to the Superintendent of Police Investigation Wing, Kohat with reference to his office Memo: No.3722/SRC dated 13.07.2022. The service roll of LHC Javed Iqbal No.70 is returned herewith, please.

ATTESTED

(MUHAMMAD SULEMAN) PSP  
District Police Officer,  
Kohat

# (A) (B) 17  
Through Proper Channel

THE HONOURABLE DEPUTY INSPECTOR GENERAL OF  
POLICE KOHAT REGION KOHAT

APPEAL AGAINST THE ORDER OF THE  
WORTHY DISTRICT POLICE OFFICER  
KOHAT NO. 8650 / SRC DATED 19-09-2022,  
VIDE WHICH APPLICATION FOR SENIORITY  
MOVED BY THE APPELLANT, IN VIEW OF  
THE STANDING ORDER NO. 02/2016, WAS  
SENT TO THE WORTHY DPO KOHAT FOR  
FIXATION OF SENIORITY WITHOUT ANY  
LAWFUL JUSTIFICATION.

Respected Sir,

ATTESTED

Respectfully the appellant may kindly be allowed to submit the following for your kind and sympathetic consideration.

FACTS:

1. That the appellant was enrolled as constable in the Frontier Reserve Police Kohat on 11-08-2009.
2. That in the year 2014, the appellant on basis of Mutual Transfer, with the permission of his senior officers was transferred from the FRP Kohat to the Regular Police District Kohat. (copy of transfer orders enclosed)
3. That while in FRP the appellant has qualified A-1 Examination vide FRP Kohat OB No. 220 dated 19-05-2014.
4. That after transfer to Kohat Police, the appellant qualified B.1 Examination and also selected for Lower Course vide endorsement No. 2211-14 dated 27-03-2015. (copy enclosed)

5. That v. notification No. 2128-65/5 dated 27-10-2015 the appellant qualified the lower course. (copy enclosed)
6. That after in the year 2016 the District Police Officer Kohat fixed seniority of those who qualified the lower college course. The appellant was placed at serial No. 251 of the seniority list. (copy enclosed)
7. That in the Seniority list of the lower course qualified list pertaining Kohat from 2018 to 2022. Seniority of the appellant was refused and the appellant was placed at serial No. 136 of the seniority list (copy of the seniority list is enclosed)
8. That in the one another seniority list of LHC w.e.f. the term ending 31-07-2017 was published. In the said seniority list, the appellant was expecting his seniority at serial No. 118 but unfortunately, name of the appellant was found missing. (copy of the list enclosed)
9. That the appellant was surprised by this gesture of the District Police Officer Kohat and as such the appellant submitted an application wherein act of removing name of the appellant was called in question and it was requested that name of the appellant may be kept intact in the seniority list and he may be given his due seniority. (copy of the application enclosed)
10. That the worthy DPO Kohat addressed the worthy DPO Karak vide memo No. 8650/SRC dated 19-09-2022 wherein standing order No. 2/2016 was made the basis of non mentioning name of the appellant in the seniority list of LHCs pertaining to Kohat for the year 2022.
11. That after perusal of the letter of the worthy DPO Kohat to worthy DPO Karak dated 19-09-2022 and standing order No. 2/206, the appellant is still of the opinion that by removing his name by the Kohat Police for the year 2022, mis-carriage of justice has been occasioned to him. the order has aggrieved the appellant and the appellant has been left no other option except to file the instant appeal.
12. That following are some of the grounds of appeal which may kindly be considered sympathetically.

ATTESTED

GROUND:

...ion of the worthy DPO Kohat is not in  
the law, rules and principles of justice,  
to be set aside.

...of writing letter, the worthy DPO Karak, the  
... Kohat may have responded application of the  
... and thereafter in light of such order, the worthy  
... ak should have been addressed. By not responding  
... ion in the shape of order, deviation from the well  
... ized procedure has taken place. Instead of informing  
... ppellant, worthy DPO Karak was addressed.

...at it is a well admitted fact that seniority is hard earned by  
an official / officer.

That especially in the police department seniority is earned  
after round the clock i.e. day and night, risking life by facing  
antisocial elements and terrorist, discharging a number of  
miscellaneous duties of law and other including preventive  
duties.

- c) That such a hard earned seniority cannot be taken away by a stroke of pen.
- f) That seniority earned by an official / officer is an inherent right. as a matter of principle it goes side by side with the official / officer. Even seniority is valid after attaining the age of superannuation.
- g) That it is established from the service record of the appellant, that he with the approval of his worthy officers was transferred from FRP Kohat to the District Police Kohat.

In Kohat police he qualified B-1 Examination, lower college course over here. Hence, there is no justification to remove his name from the seniority list.

That, stand... g order No. 2/2016 has been made basis for  
remove of... me of the appellant from the seniority list  
pertaining... District Kohat Police.

That if sta... g order No. 2/2016 perused, it will reveal that  
it was enf... l with imme... te effect but unfortunately the  
said star... order wa... used / enforced with the  
retrospec... effect.

**ATTESTED**

- j) That enforcing standing order No. 2/2016 with the retrospective effect and making the appellant victim of the said standing order is neither legal nor justified.
- k) That the appellant has been made victim of the standing order No. 02/2016 which was not applicable on the appellant. Thus injustice has been caused to the appellant.
- l) That removal of name of the appellant from the seniority list pertaining to the District Police Kohat needs to be revised and reviewed.
- m) That order / opinion of worthy District Police Officer is based on misunderstanding and thus, removal of name of the appellant from the seniority list of the District Police Kohat is unwarranted.
- n) That order / opinion of the worthy DPO Kohat is required to be set aside in the interest of law, justice and faireplay.

PRAYER:

It is therefore, humbly requested that by accepting the instant appeal, opinion / order of the worthy DPO Kohat relating to removal of name of the appellant from seniority list of the District Police Kohat may be set aside and direction for inclusion of name of the appellant in the LHCs seniority list of the District Police Kohat may kindly be issued and the appellant may be placed along with his colleagues (batch mates) i.e. below name of Muhammad Waqas at serial No. 117 of the seniority list of June 2022. The appellant will be highly thankful for your this act of kindness. I may also be heard in person please.

Dated 26-09-2022

*J*  
**ATTESTED**

Yours Obediently

*Javed Iqbal*

Javed Iqbal  
 LHC No. 70  
 Investigate Police





(D) 16 (21)

**OFFICE OF THE  
REGIONAL POLICE OFFICER,  
KOHAT REGION**

E-mail: rpokohat@gmail.com, Phone: No. 0922-9260112, Fax No. 0922-9260114

**ORDER.**

This order will dispose of a departmental appeal filed by LHC Javed Iqbal No. 70 against the impugned seniority issued by District Police Officer, Kohat vide Letter No. 8650/SRC, dated 19.09.2022. The appellant is aggrieved from the fixation of his seniority with district Karak.

Record gone through which indicates that DPO Kohat has acted according to Standing Order No. 02/2016, hence the appeal is meritless and hereby dismissed.

  
Regional Police Officer,  
Kohat Region

No. 14847-48 IEC, dated Kohat the 12 / 12 / 2022.

Copy to Superintendent of Police, Investigation Wing, Kohat for information w/r to his office Memo: No. 4860/SRC, dated 29.09.2022.

2. The District Police Officers, Kohat & Karak.

  
Regional Police Officer,  
Kohat Region

  
**ATTESTED**

- a) That the order / opinion of the worthy DPO Kohat is not in accordance with the law, rules and principles of justice, hence it is liable to be set aside.
- b) That instead of writing letter, the worthy DPO Karak, the worthy DPO Kohat may have responded application of the appellatant and thereafter in light of such order, the worthy DPO Karak should have been addressed. By not responding application in the shape of order, deviation from the well recognized procedure has taken place. Instead of informing the appellatant, worthy DPO Karak was addressed.
- c) That it is a well admitted fact that seniority is hard earned by an official / officer.
- d) That especially in the police department seniority is earned after round the clock i.e. day and night, risking life by facing antisocial elements and terrorist, discharging a number of miscellaneous duties of law and other including preventive duties.
- e) That such a hard earned seniority cannot be taken away by a stroke of pen.
- f) That seniority earned by an official / officer is an inherent right. as a matter of principle it goes side by side with the official / officer. Even seniority is valid after attaining the age of superannuation.
- g) That it is established from the service record of the appellatant, that he with the approval of his worthy officers was transferred from FRP Kohat to the District Police Kohat.

In Kohat police he qualified B-1 Examination, lower college course over here. Hence, there is no justification to remove his name from the seniority list.

- h) That, stand g order No. 2/2016 has been made basis for remove of me of the appellatant from the seniority list pertaining District Kohat Police.
- i) That if sta g order No. 2/2016 perused, it will reveal that it was enf l with immediate effect but unfortunately the said sta order was used / enforced with the retrospect effect.

**ATTESTED**



Annexure E

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

STANDING ORDER NO. 02 /2016

Quotas of Districts in Central Units

This Standing Order is issued under Article 10(3) of Police Order 2002 and in pursuance of the Police Policy Board decision taken in its 20th meeting held on 15<sup>th</sup> December 2015.

2. Aim: - This Standing Order aims at fixing the contributory quota of District and Regions in the executive strength of the Central Units.

3. Existing Sanctioned Strength in Rank as determining Factor: - (1) The executive strength from Constable to Sub-Inspector of all Central Units including Frontier Reserve Police, Elite force, Central Police Office, Special Branch, Traffic Khyber Pakhtunkhwa, CPO Investigation, Central Police Office, PQR and Training Schools and College will be provided by the Police Districts/Regions of the Province in accordance with the ratio of their existing sanctioned strength in over sanctioned strength for each rank as detailed in annexed Annexure A.

(2) CTD strength will be determined as per their requirement and deployment plan which has already been approved and issued vide CPO letter No. 3229-80/E-II dated 31.01.2014.

4. Recruitment, Promotions in Central Units;- Recruitment and promotion in the ranks from constable to Sub-Inspector will be carried out and be regulated in concerned Districts and Regions only. Central Units will neither recruit nor promote any officer unless it is specifically provided and allowed. All personnel serving in the central Units will be on deputation from concerned Districts and Regions and their lien will be in their parent District/Region. If in the past any recruitment has been carried out directly in the central units and lien of such recruits has not been fixed so far; it will be fixed in District

No. 1913-14 / 105 Dt 29/10/2016

copy to GRC/office for information  
and reference

876  
28/11/16

ATTESTED

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of elements of the concerned recruit. Furthermore for retirement purposes personnel will be posted back in their parent Districts.

5. **Tenure:-** The period in the central unit will be considered on deputation in the meaning of Police Rules and shall not exceed 03 years.

6. **Apprention:-** This Standing Order will come into force with immediate effect and transition to this scheme of things will not be at once but be in phased manner subject to occurrence of vacancies in central units and capacity of the contributing Districts to contribute as per quota in due course of time.

7. **Power to remove difficulties:-** If any difficulty arises in giving effect to this order, the Provincial Police Officer may by notification make such provisions as deemed appropriate.

8. **Amendment -** All previous Standing Orders on the subject, to the extent of the provisions of this order, shall stand amended.

(NASIR KHAN DURRANI)  
Provincial Police Officer  
Khyber Pakhtunkhwa  
Peshawar

No: 225-300/192 dated Peshawar the 25/01/ 2016

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

1. All Heads of Police Offices in Khyber Pakhtunkhwa;
2. PRO to PPO;
3. Registrar CPO.

(Muhammad Alam Shinwari) PSP  
DIG Headquarters  
Khyber Pakhtunkhwa  
Peshawar

ATTESTED

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ذباب عدائی

گزارش دوم مسائل پیوستہ تیار کی ذباب DP۵ صاحب کی طرف  
وہ جانز طرف درخواست لے کر لپیٹوں بنو چاہتا ہے -

بدر لہر رفیقہ صاحبہ سے ہم سے کہہ کر جانز طرف درخواست لے کر  
ذباب DP۵ صاحب کی طرف سے لپیٹوں بنو کر اجازت  
قروانی جائے

الوارق

Tauqeer

ماہر اقبال  $\frac{LHC}{70}$  قلمی اپنا لپیٹوں کی ضرورت کو ہمارے

Sir forwarded

Sir, forwarded.

Sir,

28-06-2022

recharge process  
28-6-22

Sir, Allowed & forwarded for  
consideration. pl: MUM  
29-6-22

ATTESTED

25  
بھٹور جناب DPO صاحب کوہاٹ

عنوان:- اخراج از سیناری ٹی لسٹ برائے سال 2022

جناب عالی!

سائل ذیل عرض رساں ہے۔

1- یہ کہ سائل 11-08-2009 کو FRP کوہاٹ میں بھرتی ہو کر سال 2016 میں افسران بالا کی اجازت سے باہمی تبادلہ کی بنیاد پر FRP کوہاٹ سے ریگولر پولیس ضلع کوہاٹ میں شامل ہوا۔

2- یہ کہ سائل 2015 میں سائل ریگولر پولیس کوہاٹ سے لوز کورس کے لئے پہلے ٹرانس فٹ منتخب ہو کر لوز کورس پاس کیا۔

3- یہ کہ سائل کا نام سیناری ٹی لسٹ 2015 میں موجود تھا جبکہ سیناری ٹی لسٹ برائے سال 2022 سے سائل کا نام سیناری ٹی لسٹ سے Standing Order سال 2016 مجاریہ جناب GP صاحب KPK کے حوالے سے سائل کا نام اس بنا پر سیناری ٹی لسٹ سے خارج کیا گیا کہ سائل کا ڈونر اسٹیلنگ کرک کا ہے۔

4- یہ کہ Standing Order 2016 مزکورہ بالا کا اطلاق سائل پر نہیں ہوتا ہے کیونکہ مزکورہ

Standing Order کا تعلق پولیس کے Central Unit سے ہے جبکہ سائل

Central Unit سے تعلق نہیں رکھتا ہے بلکہ سائل ریگولر پولیس ضلع کوہاٹ کا ریگولر ممبر ہے اور اب تک ضلع کوہاٹ میں نہایت خوش اسلوبی سے ڈیوٹی سرانجام سے رہا ہے۔

(نقل آرڈر 2016 Standing Order آئی جی پی صاحب ہمراہ درخواست لف ہے)

بوجہات بالا استدعا ہے کہ سائل کا نام سیناری ٹی لسٹ 2022 برائے اہلکاران ریگولر پولیس میں برقرار رکھے

جاسکے گا حکم صادر فرمائیں۔

العارض

ATTESTED

جاوید اقبال 70 LHC کے بی ٹی سٹاف کوہاٹ

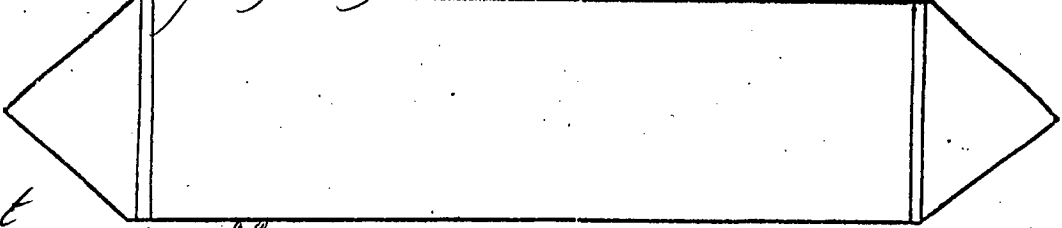
شناختی کارڈ نمبر: 1420 235259 -7

0333-6370707

موبائل نمبر:

Sir  
Mechanics  
28-6

بعدالت جیدین و خدمت خورہ مسرور حسن مسرور حسن



Appellant

۲۹۲ و مینر

تعداد ۲ مخائب

صاحب اقبال بنام

موزخہ  
مقدمہ ۲۰۲۲  
دعویٰ  
جرم

باعث تحریر آنک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام کے محاورہ کیلئے مسرور حسن مسرور حسن کے لئے  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پر واختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند ہے۔

Attest and  
Accept

المرقوم ۰۱/۱۱/۲۰۲۲ ماہ نومبر ۲۰۲۲

واہ الع

بمقام جیدین و خدمت خورہ مسرور حسن کے لئے منظور ہے۔

جیدین و خدمت خورہ  
(Appellant)