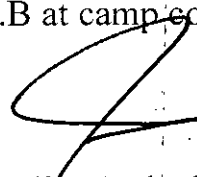


27th Sept 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl; AG alongwith Mr Abu Sufian, S.I Legal for respondents present.


Written reply on behalf of the respondents submitted which is placed on file. A copy of the same is also handed over to the learned counsel for the appellant. To come up for arguments on 26.10.2022 before D.B at camp court D.I.Khan.



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

26th Oct 2022

None for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General for respondents present.


Lawyers are on strike today. To come up for arguments on 23.11.2022 before D.B at Camp Court, D.I Khan. P.P given to the respondents.


(Rozina Rehman)
Member (J)
Camp Court, D.I Khan


(Kalim Arshad Khan)
Chairman
Camp Court, D.I Khan

24.01.2022

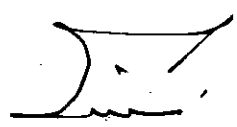
Tour is cancelled, therefore, case is adjourned to 24.05.2022 for the same as before.


Reader.

24.05.2022


Nemo for the appellant. Mr. Farhaj Sikandar, District Attorney for the respondents present and sought time for submission of reply/comments.

Previous date was changed on Reader Note, therefore, last chance given. In case the last chance as given is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant failing which the case shall be fixed before D.B for arguments without reply deeming the same as waived off by the respondents. Adjourned. To come up for submission of written reply/comments on 26.07.2022 before the S.B at Camp Court D.I.Khan.


(Saif-Ud-Din)
Member (J)
Camp Court D.I.Khan

26-7-22

Due to summer vacation to come up for the same on 27/9/2022



S.A No. 479/2019

22.11.2021

Learned counsel for the appellant present. Mr. Zar Wali Khan, S.I (Legal) alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Written reply/comments of the respondents are still awaited. Representative of the respondents sought further time for submission of written reply/comments. Last chance is given to the respondents for submission of written reply/comments on 24.01.2022 before the S.B at Camp Court D.I.Khan.


Chairman

Camp Court D.I.Khan

Postscript

22.11.2021

In case the last chance as given above is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant failing which the case shall be fixed before D.B for arguments without reply deeming the same as waived off by the respondents.


Chairman

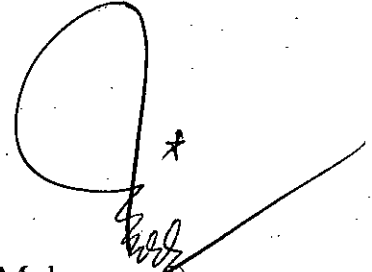
Camp Court, D.I.Khan

25.03.2021

Nemo for the appellant. Mr. Muhammad Rashid,
DDA for respondents present.

On previous date of hearing the case was
adjourned on the strength of Reader note, therefore,
Notices be issued to the parties.

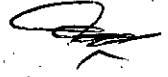
Adjourned to 22.06.2021 before S.B at camp
court D.I.Khan.



(Mian Muhammad)
Member(E)
Camp Court D.I.Khan

22.6.21

*Due to COVID-19, the case is adjourned
to 26-10-2021 for frame.*

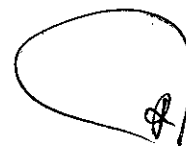


26.10.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney
present.

Reply on behalf of respondents was not submitted.
Preceding date was adjourned on a Reader's note,
therefore, notice be issued to respondents by way of last
chance with direction to furnish the same positively. To
come up for written reply/comments on 22.11.2021 before
S.B at Camp Court, D.I.Khan.

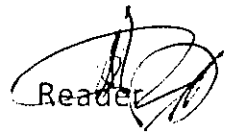


(Rozina Rehman)
Member(J)
Camp Court, D.I.Khan

21-9.2020

Due to COVID19, the case is adjourned to

22/9/2020 for the same as before.


Reader

22.09.2020

Nemo for parties.

Mr. Usman Ghani learned District Attorney present.

Written reply was not submitted on behalf of respondents. Notice be issued to appellant/counsel and respondents for submission of written reply/comments for 27.10.2020 before S.B at Camp Court D.I Khan.

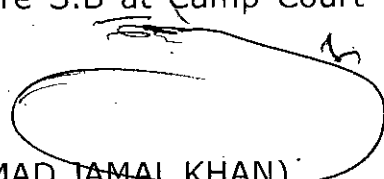


(Rozina Rehman)
Member (J)
Camp Court, D.I Khan

27.10.2020

Appellant is present in person. Mr. Muhammad Jan, Deputy District Attorney for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Deputy District Attorney requests for time to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 21.12.2020 on which date file to come up for written reply/comments before S.B at Camp Court D.I.Khan.


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT D.I.KHAN

21-12-2020

Due to COVID 19, the case is adjourned to 25.3.21 for the same.




27.02.2020

Counsel for the appellant Tahir present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Auto Mechanic in Police Department on contract basis vide order dated 19.06.2014 by the competent authority. It was further contended that after expiry of the said period, three years period was further extended to him with effect from 1st July 2016 to 30.09.2019 vide order dated 18.08.2016. It was further contended that the appellant was imposed major penalty of dismissal from service vide order dated 23.09.2016 on the allegation of absence from duty. The appellant filed departmental appeal on 14.10.2016 but the same was not responded, therefore, the appellant filed Writ Petition which was disposed of and the appellant was held at liberty to seeks his relief before appropriate forum, if so advised vide judgment dated 10.12.2018. It was further contended that again the appellant filed departmental appeal on 04.01.2019 but the same was again not responded, therefore, the appellant filed the present service appeal on 27.03.2019. Learned counsel for the appellant contended that neither charge sheet, statement of allegation was served nor proper inquiry was conducted nor any absence notice was issued at the home address of the appellant nor any final show-cause notice was issued through advertisement in the newspaper, therefore, the appellant was condemned unheard and the impugned order is illegal and liable to be set-aside.

The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to limitation and all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 21.04.2020 before S.B at Camp Court D.I.Khan.

Appellant Deposited
Security & Process Fee


3/3/20


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

Service Appeal No. 479/2019


28.11.2019

Appellant in person present and requested for adjournment on the ground that his counsel is not available today due to general strike of the Bar. Adjourned to 30.01.2020 for preliminary arguments before S.B at Camp Court D.I.Khan.


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

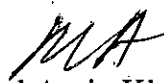
30.01.2020

Clerk of counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 27.02.2020 for preliminary arguments before S.B at Camp Court D.I.Khan.


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan


26.06.2019

None present on behalf of the appellant. Notice be issued to appellant and his counsel for attendance and preliminary hearing for 28.08.2019 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

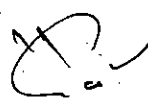
28.08.2019

None present on behalf of the appellant. Notice be issued to appellant and his counsel for attendance and preliminary hearing for 25.09.2019 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

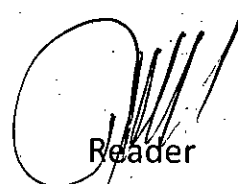
25.09.2019

Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 23.10.2019 before S.B at Camp Court, D.I.Khan.


Member
Camp Court, D.I.Khan.

23/10/2019

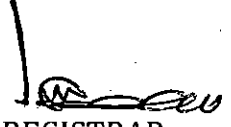

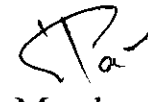
Since tour to D.I.Khan has been cancelled .To come for the same on 28/11/2019.


Reader

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 479/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/04/2019	<p>The appeal of Mr. Muhammad Tahir received today by post through Mr. Akbar Ali Khan Barakzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 9/4/19</p>
2-		<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>24-4-2019</u></p> <p> CHAIRMAN</p>
24.04.2019		<p>Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on 26.06.2019 before S.B at Camp Court, D.I.Khan.</p> <p> Member Camp Court, D.I.Khan.</p>

The appeal of Mr. Muhammad Tahir son of Awal Khan r/o Mohallah Haqdad Abad tehsil and District Lakki Marwat received today i.e. on 27.03.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be flagged.
- 2- Annexures of the appeal may be attested.
- 3- Four more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 608 /S.T,

Dt. 29-3- /2019


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Akbar Ali Khan Barakzai Adv.
High Court D.I.Khan.

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

Service Appeal No. 479/2019

MUHAMMAD TAHIR

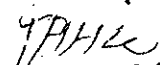
V/S

GOVT OF K.P.K ETC

INDEX.

S.No.	Partifulars of documents	Annexure	Pages.
1.	Memo and grounds of Appeal, alongwith Condonation of Delay Application.		1-6
2.	Copy of Domicile & C.M.I.C	A	7
3.	Copy of Advertisement.	B	8
4.	Copy of Educational Qualification and Mechanical Certificate	C	9-12
5.	Copy of appointment order of Appellant.	D	13-15
6.	Copy of letter regarding Extention of Services of Appellant.	E	16-19
7.	Copy of impugned termination order dated. 27. 9. 2016		20-21
8.	Copy of Departmental Appeal	F	22-23
9.	Copy of Judgment/order of the Hon'ble Peshawar High Court	G	24-27
10.	Copy of 2nd Departmental appeal	H	28-30
11.	Wakalatnama		31-

Your Humble Appellant.


Muhammad Tahir
through Counsel.


(Akbar Ali Khan Barakzai)
Advocate High Court.

Dated. 25. 3. 2019.

BEFORE THE PRESIDING OFFICER KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 479/2019

Khyber Pakhtunkhwa
Service Tribunal

Entry No. 487

Dated 27/3/2019

Muhammad Tahir S/O Awal Khan,
R/O Mohallah Haqqad Abad
Tehsil and District
Lakki Marwat.

APPELLANT

V/S

1. Government of Khyber Pakhtunkhwa through
Inspector General Police Peshawar.
2. Deputy Inspector General Police Bannu Region
Bannu.
3. District Police Officer Lakki Marwat.
4. Motor Transport Officer, Police Line Lakki Marwat

..... RESPONDENTS.

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA
ACT 1974 AGAINST THE IMPUGNED TERMINATION ORDER DATED
23.9.2016 OF RESPONDENT NO. 3.

Filed to-day

Registrar

27/3/2019

PRAYER.

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED
TERMINATION ORDER DATED. 23.9.2016 MAY PLEASE BE
SET ASIDE AND THE APPELLANT BE RESTORED ON HIS
SERVICE WITH ALL BACK BENEFITS.

Respectfully Sir,

1. That the Appellant is a permanent resident of
Tehsil & District Lakki Marwat. Copy of G.N.I.C and
Domicile Certificate is enclosed as ANNEXURE A.

2. That the Respondents advertised vacancies of Police Constables in Special Police Force in Police Department in the year 2014. Copy of the advertisement is enclosed as Annexure B

3. That the Appellant being eligible /qualified applied for the vacancy of Police Constable and appeared in the test and interview and secured top position in the merit list. Copy of Educational Certificate and well as Mechanical Certificate is enclosed as Annexure C

4. That thereafter the Respondents issued the Appointment order of the Appellant as Constable in Special Police Force being Auto Mechanical & Auto Electrician with effect from 19.6.2014. Copy of the Appointment order is enclosed as Annexure D.

5. That due to his good performance, his contract services were extended for further three years. Copy of the order is enclosed as Annexure E

6. That the Appellant shocked to know that suddenly the Appellant received a letter/order dated. 23.9.2016 stating therein that the Services of Appellant is not beneficial to Department, hence dismissed from services. Copy of the impugned dismissal order dated. 23.9.2016 is enclosed as Annexure F

7. That the Appellant filed a Department Appeal against the impugned termination/dismissal order of the Respondent, which have not been respondent till now. Copy of the Departmental appeal is enclosed as Annexure G.

8. That the Appellant feeling aggrieved from the impugned order filed a Writ Petition before the Hon'ble Peshawar High Court Bench D.I. Khan disposed off / dismissed on the basis of maintainability and the Appellant was directed to approach to ~~correct~~^{proper} forum, if he desires. Copy of order dated. 10.12.2018 Copy enclosed as Annexure H

9. That the Appellant filed second Departmental Appeal reply/decision of is still awaited. Copy of which is enclosed as Annexure -I

10. That the Appellant being aggrieved approach this Hon'ble Tribunal inter alia on the following grounds.

G R O U N D S .

1. That the act and omission of the Respondents are illegal, unlawful and without lawful authority and is liable to be set aside.
2. That the Appellant have performed his duty to the entire satisfaction of his Superiors. There is no any dent and stigma on his services and this is the reason that the Appellant Services have been extended. The Appellant never remained absent.
3. That the Appellant was deputed to work / perform his duty in City Lakki Marwat, as there is no any Workshop in Tajazai. Wherein the Department vehicle come for repairing, the Appellant was performing his duty without any hesitation. The Appellant have already lodged a Complaint against Muhammad Ajmal Khan (Ex M.T.O.) Thus order passed due to malafide and ulterior motives of the then T.M.O.
4. That no show cause notice or summary of allegation has been given to the Appellant before issuing the termination order dated. 23.9.2016. Thus not sustainable.

5. That no any enquiry have conducted against the Appellant. On one Stroke of pen his approximate 2/3 years services have been terminated. No personal hearing opportunity have been granted to the Appellant.

6. That no any police rule, law have been quoted while issuing the termination order of the Appellant. The District Police Officer is not authorize to kickout his services without issuing show cause notice, and without conducting of enquiry. The Appellant has been conducted unheard.

7. That the Counsel of the Appellant may also be allowed to raise additional grounds during course of hearing.

Inwake of submissions made above it is humbly prayed that the services of the Appellant may be restored with all back benefits and the termination/dismissal order issued by respondent dated. 23.9.2016 be recalled /set aside.

Tahir
Your Humble Appellant.

Tahir

through Counsel.

Akbar Ali Khan
(Akbar Ali Khan)
Advocate High Court

Dated. 23/3/2019.

LK
4/A
BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

Muhammad Tahir Khan

V/S

Govt of K.P.K etc

AFFIDAVIT.

I, Muhammad Tahir S/o Awal Khan R/O Lakki Marwat
do hereby solemnly affirm and declare on oath that
the contents of the application/Appeal is true
and correct to the best of my knowledge and
belief and that nothing has been kept secret.

TAHIR
Deponent.

Dated. 25.3.2019.

~~Oath Commission
R.O. & A.O.
District Bar, D.Khan~~

C.M. No. _____ 2019

Muhammad Tahir
V/S
Govt of K.P.K etc

APPLICATION FOR CONDONATION OF DELAY IN SUBMISSION/
FILING OF SERVICE APPEAL.

Respected Sir

That the titled Condonation of Delay application is being filed alongwith the main Appeal , grounds of which may be treated as part and parcel of the same.

That the Appellant had filed a Writ Petition in the Hon'ble Peshawar High Court which was dismissed with a direction to approach the Competent Court if desired.

That the Appellant was mistakenly advised to approach to the Hon'ble Peshawar High Court in writ Petition , under the impression that he have remained no more Civil Servant , and after the direction of Hon'ble Court , the Petitioner filed another departmental appeal under the impression that Petitioner has accrued further right of Departmental Appeal , as the previous Departmental appeal was not replied therefore such improper forum etc was not intentional .Therefore delay in filing the present appeal may kindly be condoned.

That the Appellant is thinking that his appeal is well within time after receipt of Hon'ble Peshawar High Court order dated.10.12.2018 , if this Hon'ble Court feel delay , may kindly be condoned.

In wake of submissions made above it is humbly prayed that the delay may kindly be condoned.

Your Humble Appellant.

Muhammad Tahir
Tahir

Dated.25.3.2018.

6

BEFORE THE K.P.K SERVICE TRIBUNAL PESHAWAR.

Muhammad Tahir

v/s

Govt of K.P.K etc

AFFIDAVIT.

I, Muhammad Tahir S/O Awal Khan R/O Lakki Marwat City do hereby solemnly affirm and declare on oath that the contents of the appeal is true and correct to the best of my knowledge and belief and that nothing has been kept secret.

Oath Commissioner
R.O. & A.C.
District Bar, D.I. Khan

Deponent.

Tahir

7/A

PAKISTAN

Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name
Muhammad Tahir

Father's Name
Awal Khan

Gender | Country of Stay
M | Pakistan

Identity Number | Date of Birth
11201-8767487-1 | 18.03.1988

Date of Issue | Date of Expiry
18.07.2018 | 18.07.2028



Holder's Signature

39500

Handwritten signature

767487-1

سٹیٹل سروسز ایجنسی پاکستان

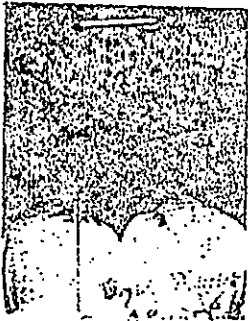
سٹیٹل سروسز ایجنسی پاکستان

101161223605

گمشدہ کارڈ ملنے پر قریبی لیو بکس میں ڈال دیں

Ministry of Information
Registration: General of Pakistan

15/11/09 (1/1)



DOMICILE CERTIFICATE



Annex A

I, Abdul Wahid Son / Daughter / Wife
of Abdul Wahid, declare that I was born of parents who are
permanently Domiciled in N.W.F.P, having been born / settled in this province.

I belong by birth to Mohallah Abdul Wahid
Village: Abdul Wahid Tehsil: Abdul Wahid
District Lakki Marwat.

Self / Father / Brother / Husband NIC No.
1-201-1075039-5

Techler
Signature of the Applicant
Dated: 11/15 /2009

Pursuance to the declaration dated: 11/15 /2009, filed by
Abdul Wahid Son / Daughter / Wife of Abdul Wahid
domicile in the N.W.F., It is hereby certified that the said Abdul Wahid
is born of parents who are permanent residents of the N.W.F.P, having been born /
settled in it.

I have satisfied my self from personal knowledge / verification through
Revenue Staff that the above declaration is true & certified accordingly.

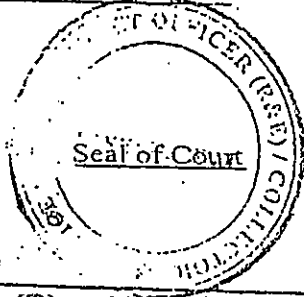
This 15 day of 15 2009



Seal of Court

Deputy District Officer
Revenue & Estate / Judicial
Lakki Marwat

No. 2248 / Do / R&E / Lm Dated: 15/5 /2009



Seal of Court

Sibt Ali / Zafar

COUNTERSIGNED

M. J.
District Officer (R&E)
Collector, Lakki Marwat

جناب عالی!

تصدیق کی جاتی ہے۔ کہ مہسی اسمتہ محمد عامر

ولد ادختر اورجہ اول خان قوم نروٹ

خود اور اس کے والدین محلہ غلہ سہہ تحصیل گاؤں بند کھیل عمر قوم فار

تحصیل بکروت ضلع کی مرہوت کے مستقل رہائشی و پیدائشی باشندگان ہیں۔

حال حاضر حقدار آغا دہلوی اور ایف بی اے کے کوئی حق نہیں رکھتے۔ ہذا رپورٹ عرض ہے۔

محمد عامر

پیواری حلقہ ۱۹/۲۱۵۲

۱۱-۱۰-۱۹۷۶

محمد بشیر کا تصدیق شدہ ۱۹/۱۵۷-۶

Muhammad Bashir
DANDONGO

گرداور سرکل

Attested as verified by the Revenue Staff

Tehsildar / Naib Tehsildar

۱۵/۱۵۵/۲۸

اسٹیشن ہاؤس کے لئے زمین کی خریداری کے سلسلے میں

ضلع کی مروت میں کنٹریکٹنگ سٹیل پولیس فورس میں بھرتی کے لئے ذیل شرائط پر پورا اترنے والے حضرات کو بذریعہ اشتہار بتا دیا گیا ہے کہ وہ اپنی تحریری درخواستیں بمعہ تصدیق شدہ دستاویزات (ڈسچارج بک / پنشن بک) استاد (قومی شناختی کارڈ، تعلیمی سند ڈیو بی ایس بمعہ دو عدد تصاویر) دفتری اوقات کار میں دفتر ڈسٹرکٹ پولیس آفیسر میں مورخہ 29-5-2014 تک جمع کروائیں۔ تحریری ٹیسٹ اور انٹرویو کے دن اصل اسناد ساتھ لانا لازمی ہے کنٹریکٹ کی میعاد تاریخ بھرتی سے 31-12-2015 تک سے بھرتی کے مرحلہ پر اپنا اصل قومی شناختی کارڈ ہمراہ لائیں۔

- (1) کوٹاف برائے بھرتی امیدواران سپیشل پولیس فورس :-
عمر 18 تا 45 سال۔ ڈیو بی ایس ضلع کی مروت (فکس تنخواہ- 15,000/- کنٹریکٹ 31 دسمبر 2015 تک)
- (2) جسمانی معیار :-

قد: 5 فٹ 7 انچ چھاتی: 34x33 1/2 انچ

- (3) شرائط برائے بھرتی :- (1) کسی بھی عدالت سے سزایافتہ نہ ہو (2) کورٹ مارشل نہ ہو (3) ریٹائرمنٹ طبی بنیاد پر نہ ہو (4) سابقہ طور پر پکار ڈھانچا ہو (5) جسمانی طور پر مکمل فٹ ہو اور کوئی معذوری نہ ہو (6) بھرتی کے بعد تنخواہ کے علاوہ دیگر کوئی مراعات نہ دی جائے گی۔ (7) درخواست کنندہ ضلع کی مروت کا مستقل باشندہ ہو۔

(4) فورسز سے ریٹائرڈ شدہ امیدواران کو ترجیح دی جائے گی۔ (5) پولیس سبز (پولیس ملازمان کے بیٹوں) کے لئے کوٹہ 10% بھی مقرر کیا گیا ہے۔ (6) ہنرمند افراد (گٹ ڈرائیور) (7) مسٹری آٹو ملکینک الیکٹریشن کے لئے 10% کوٹہ مقرر کیا گیا ہے تاہم ان ہنرمند افراد کے لئے تعلیم قد و چھالی کی کوئی شرط نہ ہوگی ڈرائیور کے LTV یا HTV انسٹنس ہونا اور گٹ کے لئے کم از کم تین سالہ تجربہ ضروری ہے۔

فزیکل / آڈیٹ ٹیسٹ :- مورخہ 30, 31-5-2014 کو بمقام سٹیڈیم ٹاؤن ناچرز ٹی میں ہوگی جس کا دورانیہ 7 منٹ فاصلہ 1 میل ہوگا۔

تھیوری ٹیسٹ :- مورخہ 31-5-2014 کو بمقام سٹیڈیم ٹاؤن ناچرز ٹی میں ہوگا۔

انٹرویو :- مورخہ 2-6-2014 کو بمقام دفتر DPO کی مروت میں ہوگا۔

اسٹیشن ہاؤس کے لئے زمین کی خریداری کے سلسلے میں

INF(P)1875

www.khyberpakhtunkhwa.gov.pk



(12) Annex-6
(9)

104513

S. No.

BOARD OF INTERMEDIATE & SECONDARY EDUCATION, BANNU
KHYBER PAKHTUNKHWA, PAKISTAN

Secondary School Certificate Examination

Detailed Marks Certificate

Session (Annual 10th) 2012

Roll No: 51121

Group: Humanities

Registration No: 22506-Pvt-1-11

Muhammad Tahir Khan

Son/Daughter of Awaj Khan

appeared as Private candidate of District Lakkhi Marwat

has secured the marks shown against each subject, in the Secondary School Certificate Examination, held in the month of March, 2012. The Examination was taken as a whole.

SUBJECTS	MAXIMUM MARKS				MARKS OBTAINED				Total	In Words
	9Th		10Th		9Th		10Th			
	Theory	Practical	Theory	Practical	Theory	Practical	Theory	Practical		
1. English	75		75		35	-	33	-	68	Sixty-Eight
2. Urdu	75		75		25	-	35	-	60	Sixty Only
3. Islamiyat	75				29	-	-	-	29	Twenty-Nine
4. Pakistan Studies			75		-	-	25	-	25	Twenty-Five
5. General Science	75		75		43	-	47	-	90	Ninety Only
6. Arts And Model Drawing	35	40	35	40	20	20	26	19	85	Eighty-Five
7. Islamic Studies	75		75		38	-	56	-	94	Ninety-Four
8. Mathematics	75		75		25	-	33	-	58	Fifty-Eight

Total Marks: 1050

Marks Obtained:

509-D Five Hundred Nine Only

Remarks

Humanities

Date of Birth: 13-03-1989 (Eighteenth March, Nineteen Eighty-Nine)

Date of declaration of Result: 12-05-2012

Prepared by: [Signature]

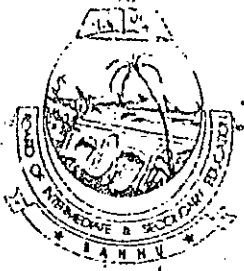
Checked by: [Signature]

Date of issue: 12-06-2012

[Signature]
Controller of Examinations

Note: Error / Omission excepted.

(COMPILED BY COMPUTER CELL BISE, BANNU)



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION, BANNU
KHYBER PAKHTUNKHWA, PAKISTAN

Higher Secondary School Certificate Examination

S. No. 055709

Provisional and Detailed Marks Certificate

Session: (Annual Part-II) 2014

Roll No: 46684

Group: Humanities

Registration No: 22939-Pvt-I-13

Mahammad Tahir Khan Son/Daughter of Anil Khan

appeared as Private candidate of Lakki Marwat

has secured the marks shown against each subject, in the Higher Secondary School Certificate Examination, held in the month of April. The Examination was taken as a whole.

SUBJECTS	MAXIMUM MARKS				MARKS OBTAINED				Total	In Words
	Part-I		Part-II		Part-I		Part-II			
	Theory	Practical	Theory	Practical	Theory	Practical	Theory	Practical		
1. English	100		100		35	-	33	-	68	Sixty-Eight
2. Urdu	100		100		48	-	44	-	92	Ninety-Two
3. Islamiyat Compulsory	50				26	-	-	-	26	Twenty-Six
4. Pakistan Studies			50		-	-	22	-	22	Twenty-Two
5. Islamiyat Elective	100		100		66	-	39	-	105	One Hundred Five
6. Islamic History	100		100		46	-	53	-	99	Ninety-Nine
7. Civics	100		100		37	-	44	-	81	Eighty-One

Total Marks: 1100 Marks Obtained: 493-D Four Hundred Ninety-Three Only

Remarks

Date of declaration of Result: 26-07-2014

Prepared by: [Signature]

Checked by: [Signature]

Date of issue: 26-07-2014

Controller of Examinations

Note: Error / Omission excepted.

(COMPILED BY COMPUTER CELL BISE, BANNU)



UNIVERSITY OF SCIENCE & TECHNOLOGY BANNU

Khyber Pakhtunkhwa PAKISTAN

S.No: 381737

DETAILED MARKS CERTIFICATE

Bachelor of Arts

Session: 2014-2016

Part-I Re-Appear Examination Held in May, 2017

Name: Muhammad Tahir Khan Roll No: 66598
 Father's Name: Awal Khan Reg No: 2014-UB-LP-73495
 Institute Name: Private Candidate

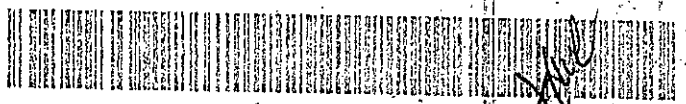
No.	Subjects	Max Marks	MARKS OBTAINED				Remarks
			Theory	Practical	Total	In Words	
1	English (Comp)	75	33	---	33	THIRTY-THREE	
2	Islamic Studies (Elective)	75	39	---	39	THIRTY-NINE	
3	Islamic Education (Comp)	60	26	---	26	TWENTY-SIX	
4	Arabic	75	26	---	26	TWENTY-SIX	
Total		285			124	ONE HUNDRED TWENTY-FOUR	

Note: Required Pass Percentage in each Subject (Written & Practical Separately) 33, Aggregate Pass Percentage 36

Prepared by: [Signature]
 Checked by: [Signature]

[Signature]
 Controller of Examinations
 University of Science & Technology, Bannu

Result Declaration Date	18-08-2017
Issue Date	18-08-2017



[Signature]

[Signature]

Roll No: 66598
 Muhammad Tahir Khan S/O Awal Khan

Mohallah Haq Dad Abad Lakki Marwat
 Errors & omissions excepted, if any, are subject to subsequent rectification.

12

Serial No. 1011

Roll No. 5883
Reg: VTCL/M/1234

KHYBER PAKHTUNKHWA TRADE TESTING BOARD
SESSION : 2012
MORA VOCATIONAL TRAINING COURSE

Witnessed by SAG / SAG / SAG M. Tahir S/O / S/O / S/O Awal Khan

President of the Larki Marwat Institute Vocational Tag Center Ser Naurang

Skill Standards of One Year

Standards presented by the National Training Board Government of Pakistan in the Trade of Auto Mechanical

The test was conducted by the KHYBER PAKHTUNKHWA Trade Testing Board in the month of 22/10/2012

SAG / SAG proficiency in the trade test is as under:

1. Theory 2. Practical 351/400

The examination was taken as a whole in parts.

Stand for recognition hereby this Trade Certificate is valid on the Day of the Month of December 2012

Secretary

[Signature]

HEAD MASTER

A. Khan

[Signature]

Chairman

13

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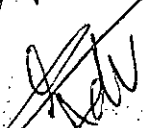
Attested by [Signature]

ORDER.

Amir D 13

In the light of instructions of worthy Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar vide Endst: No. 2654-88/A-III, dated 01.04.2014, the following candidates are hereby appointed in Special Police Force as SPO, on fixed pay @ Rs: 15,000/- per month (contract basis) w.e.f 10.06.2014 subject to the Medical fitness and local verification. The post shall automatically stand abolished on expiry of the said contract on 31.12.2015. Their services can be terminated any time without assigning any reason.

S. No.	Name & Father Name	Resident of	Police Station	Remarks	SPO#
1.	Akber Zaman s/o Ghulam Jan	Bazak Khel Abba Khel	Lakki	Ex-Service Man	1.
2.	Mir Ahmad s/o Aman Ullah Khan	Kotka Sheikh Azim Gambila	Tajori	//	2.
3.	Rasool Khan s/o Qasim Khan	Wanda Zeran	Lakki	//	3.
4.	Asmat Ullah s/o Khan Badshah	Adamzai	Tajori	//	4.
5.	Muhammad Bashir s/o Muhammad Hassan	Kotka Mehmood	Tajori	//	5.
6.	Muhammad Yaqoob s/o Madullah	Abba Khel	Lakki		6.
7.	Rahim Dad s/o Halbat Khan	Behram Khel	Tajori		7.
8.	Mashal Khan s/o Ghani ur Rehman	Wanda Mash	Dadiwala	//	8.
9.	Ahmad Shah s/o Muhammad Shah	Abba Khel	Lakki	//	9.
10.	Mustar Gul s/o Mukhtar Gul	Behram Khel	Tajori	//	10.
11.	Dilawer Khan s/o Jamil Khan	Kotka-Sakhi Jan	Tajori	//	11.
12.	Arif Ullah s/o Nazir Ahmad	Shahbaz Khel	Pezu	//	12.
13.	Mir Ali Khan s/o Yousaf Khan	Sargara Muhammad Khan Bhattani	Tajori	//	13.
14.	Ali Marjan s/o Bakhmal Jan	Aba Khel	Lakki	//	14.
15.	Anwar Kamal s/o Abas Khan	Farid Khel Bhettoni (FR Lakki)	Tajori	//	15.
16.	Sami Ullah s/o Shadi Khan	Dhoda	Lakki	//	16.
17.	Akhter Zaman s/o Kaisaf Khan	Tajori	Tajori	//	17.
18.	Iqbal Khan s/o Alla Muhammad	Pahar Khel Pacca	Ghazni Khel	//	18.
19.	Abdul Qayyum s/o Mazullah Khan	Zangi Khel	Lakki	//	19.
20.	Ali Marjan s/o Ghazi Marjan	Adam Zal	Tajori	//	20.
21.	Muhammad Zaman s/o Akber Zaman	Nawar Khel	Lakki	//	21.
22.	Abdul Qayyum s/o Mosam Khan	Manzer Faqir	Tajori	//	22.
23.	Shafqat Raza Shah s/o Matloob Hussain Shah	Mina Khel	Lakki	//	23.
24.	Habib ur Rehman s/o Noroz Khan	Abba Khel	Lakki	//	24.
25.	Rehman gul s/o Gul Sherin	Behram Khel	Tajori	//	25.
26.	Sher Muhammad s/o Bahader Khan	Zangi Khel	Lakki	//	26.
27.	Rafi Ullah s/o Abdul Janan	Kotka Shah Muhammad	Tajori	//	27.
28.	Qamer Ali s/o Zardad Khan	Bragi	Naurang	Fresh	28.
29.	Inam u din s/o Pasham	Masha Mansoor	Pezu	Ex-service man driver	29.
30.	Sanaullah s/o Abdul Ghafar	Lakki Sheru Khel	Lakki	//	30.

Accepted for the file


31.	Irfanullah s/o Naeemullah	Wanda Mala Khel	Pezu	Ex-serviceman driver	31.
32.	Moula Jan s/o Dilbaz Khan	Bragi	Naurang	Fresh	32.
33.	Mohammad Tahir s/o Awal Khan	Moh: Haqqad Abad	Lakki	Auto Mech;	33.
34.	Bahader Nawaz Khan s/o Ghani ur Rehman	Bragi	Naurang	Fresh	34.
35.	Anjad Abbas Shah s/o Gulzar Shah	Moh: Mina Khel	Lakki	Auto Elect:	35.
36.	Khalat s/o Nazar Khan	Walai	Naurang	Fresh	36.
37.	Mehmood Iqbal s/o Mohammad Iqbal	Moh: Mina Khel	Lakki	//	37.
38.	Jan Daraz s/o Gul Faraz	Tap Takhti Khel	Naurang	//	38.
39.	Hafeezullah s/o Mohammad Ramzan	Kol Kashmir	Tajori	//	39.
40.	Javed Khan s/o Akber Zaman	Tap Takhti Khel	Naurang	//	40.
41.	Sikander Abbas s/o Afsar Ali Shah	Moh: Mina Khel	Lakki	//	41.
42.	Aziz Khan s/o Pir Dewan Shah	Shagai	Naurang	//	42.
43.	Atiqullah s/o Gul Aslam	Bragi	Naurang	//	43.
44.	Shahdil s/o Gul Hamid	Moh: Saeed Khel	Lakki	//	44.
45.	Zakirullah s/o Nadir Khan	Moh: Shahab Khel Shagai	Naurang	//	45.
46.	Ikramullah s/o Mohammad Nawaz	Landi Mir Salam	Tajori	//	46.
47.	Abdul Basir s/o Ghulam Sarwar	Shahtora	Naurang	//	47.
48.	Qudratullah s/o Zar Khan	Dalo Khel	Lakki	//	48.
49.	Wahidullah Khan s/o Gulzadin	Bragi	Naurang	//	49.
50.	Zahid Iqbal s/o Sabir Shah	Wanda Baroch	Lakki	//	50.
51.	Shad Mali s/o Gul Daraz	Walai	Naurang	//	51.
52.	Imranullah s/o Bahader Khan	Mir Azam Michan Khel	Dadiwala	//	52.
53.	Inamullah s/o Saadullah Khan	Mama Khel	Naurang	//	53.
54.	Hazrat Usman s/o Mani Khan	Abba Khel	Lakki	//	54.
55.	Ihsanullah s/o Amanullah	Daulat Khel	Lakki	//	55.
56.	Kalimullah Khan s/o Gul Shah Jehan	Mir AZam Michan Khel	Dadiwala	//	56.
57.	Kalimullah s/o Inayatullah	Harama Tala	Tajori	//	57.
58.	Imranullah s/o Almer Jan	Baist Khel	Tajori	//	58.
59.	Zahid Khan s/o Mir Khan	Daraka Aziz Khan	Tajori	//	59.
60.	Kiramattullah s/o Hussain Shah	Abba Khel	Lakki	//	60.
61.	Shafiqatullah s/o Akhter Zaman	Shakh Quli Khan	Naurang	//	61.
62.	Wahid ur Rehman s/o Ghani ur Rehman	Gandi Khan Khel	Naurang	//	62.
63.	Mohammad Ilyas s/o Abdul Samad	Issak Khel	Lakki	//	63.
64.	Afzal s/o Deewan Shah	Pahar Khel Pacca	Ghazni Khel	//	64.
65.	Hikmatullah s/o Iqbal Khan	Daraka Aziz Khan	Tajori	//	65.
66.	Inziman Hussain s/o Istikhar-uddin	Shehbaz Khel	Pezu	//	66.
67.	Mohammad Numan s/o Mohammad Ibrahim	Adamzai	Tajori	//	67.
68.	Mohammad Isharq s/o Misal Khan	Zer Jano	Lakki	//	68.
69.	Irfanullah s/o Rozi Khan	Landiwah	Dadiwala	//	69.
70.	Ziaullah s/o Inayullah	Nawer Khel	Lakki	//	70.
71.	Gul Nawaz s/o Miryaz Khan	Gati Michan Khel	Dadiwala	//	71.
72.	Mohammad Rafiq s/o Hazrat Noor	Harama Tala	Tajori	//	72.
73.	Rahatullah s/o Mohammad Nazir	Mama Khel	Naurang	//	73.
74.	Mohammad Asif Nawaz s/o Gul	Kherru Khel Pacca	Ghazni	//	74.

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 H. J.

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75.	Rizwanullah s/o Asmatullah	Tajazai	Ghazni Khel	//	75.
76.	Fazal Rehman s/o Sultan Khan	Tajori	Tajori	//	76.
77.	Bismillah Jan s/o Ghani ur Rehman	Abo Khan Suieman Khel	Tajori	//	77.
78.	Hayat Khan s/o Faizullah	Baigan	Tajori	//	78.
79.	Kifayatullah s/o Saleh Khan	Gand Khan Khel	Naurang	//	79.
80.	Wilayat ur Rehman s/o Abdul Baqi Khan	Mela Mandra Khel	Lakki	//	80.
81.	Alamat Ali s/o Sardar Ali	Shah Hassan Khel	Lakki	//	81.
82.	Noor Salim Khan s/o Abdul Manan Khan	Langer Khel Pacca	Pezu	//	82.
83.	Khursheed Alam s/o Mohammad Alam	Shamoni Khattak	Dadiwala	//	83.
84.	Ziaullah s/o Khan Sardar Khan	Sheri Khel	Pezu	Police sons	84.
85.	Waliullah s/o Mohammad Ajmal	Mir Hazar Khanzad Khel	Ghazni Khel	//	85.
86.	Azizullah s/o Moinullah Khan	Baz Kala	Naurang	//	86.
87.	Rafiullah Khan s/o Ghulam Qadir Khan	Gul wali Abad	Lakki	//	87.
88.	Khalid Rehman s/o Gul Rehman	Naurang	Naurang	//	88.
89.	Hazrat Bilal s/o Gul Subhan	Mela shahab Khel	Lakki	//	89.
90.	Naimatullah s/o Mohammad Ayub	Moh: Umerabad	Lakki	//	90.
91.	Wajid Khan s/o Abdul Hai Khan	Mama Khel	Naurang	//	91.
92.	Mohammad Saeed Khan s/o Mohammad Iqbal	Landiwah	Dadiwala	//	92.
93.	Zahidullah s/o Khair Muhammad	Dallo Khel	Lakki	//	93.
94.	Gul Zaman s/o Sada Khan	Masti Khanni	Dadiwala	Ex: Service Man Cook	94.
95.	Ahmad Ali s/o Nadir Shah	Kaka Khel	Ghazni Khel	//	95.
96.	Farzana Shaheen D/o Amal Din	Mina Khel Lakki	Lakki	Lady const:	96.
97.	Rabia Bibi D/o Abdul Wahab	Begu Khel Present lakki Saeed Khel	Lakki	//	97.
98.	Asia Bibi D/o Abdul Wahab	Begu Khel Present lakki Saeed Khel	Lakki	//	98.
99.	Rehana Yasmin D/o Khawaja Masoom	Tajazai	Ghazni Khel	//	99.
100.	Asmat Salim D/o Salim Khan	Moh: Sher Khel	Lakki	//	100.

Oil No. 247 /
 Dated 19-6 / 2014.

District Police Officer,
 Lakki Marwat.

No. / dated Lakki Marwat the / 2014.

Copies to Pay Officer, SRC, OASI, incharge Clothing Godown and Lines Officer for necessary action.

Attested for office
[Signature]

[Signature]
 District Police Officer,
 Lakki Marwat.



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar
No. 911/c-32 /A-3, Dated Peshawar 15/8/2016

5636
20-8-16

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To :

1. The Additional IsGP Special Branch at CTD Peshawar
2. The Capital City Police Officer, Peshawar.
3. The Deputy Inspector General of Police Counter Terrorism Department, Peshawar.
4. The District Police Officers, Mardar, Charsadda, Nowshera, Swabi, Abbottabad, Mansehra, Haripur, Kohistan, Tor Ghar, Swat, Shangla, Buner, Dir Upper & Lower, Chitral, Kohat, Hangu, Lakki Marwat & Dikhan.

Subject: EXTENSION OF 9525 POSTS OF SPECIAL POLICE FORCE

Sl. No.	DPOR Upper DP 4316
30	625

Sl. No.	UPOR Shangla SH 4023
30	300

Sl. No.	DPOR Upper DP 4616
1,000	114,300,000
1,000	114,300,000
1,000	114,300,000
1,000	114,300,000
1,000	114,300,000
1,000	114,300,000
1,000	114,300,000
1,000	114,300,000

Sl. No.	UPOR Shangla SH 4023
60	114,000,000
60	114,000,000
60	114,000,000
60	114,000,000
60	114,000,000
60	114,000,000
60	114,000,000
60	114,000,000

I am directed to refer to the subject cited above and to enclose audit copy duly authenticated by Home & Finance Departments which is self explanatory for further necessary action.

(SABZALI KHAN)
Budget Officer,
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

Copy of above is forwarded for information to Assistant B-1 Budget Branch CPO.

e-T-c
20/08/16

Attest
[Signature]

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Department of Physical Education
 Home & T.A.'s Department, Peshawar

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The Government of Punjab, Peshawar is pleased to award contract to the extension of the contract period of 3000 personnel of the following Special Police Force for a further period of 3 years with effect from July 2016 to June 2019 as follows:

Distribution of Posts													
Code	Rank	DPO/Abbottabad AD 4022	DPO/Buner BD 4012	DPO/Chamadda CA 4016	CTD KP PR 4013	DPO/Taxi Char TG 4001	DPO/Chahal CL 4006	DPO/Dit Lower DA 4021	DPO/Dixhan DI 4039	DPO/Dit Upper DP 4016	DPO/Hangu HG 4013	DPO/Hafiz HR 4009	Mini Total
SP7	Special Police Force (Fixed Pay)	100	600	450	100	300	200	1050	100	635	100	170	5570
													5570

Distribution of Posts													
Code	Rank	DPO/Kohistan KD 4017	DPO/Khatl KT 4043	DPO/Lalji LK 4002	DPO/Manshra MA 4027	DPO/Mardan MR 4033	DPO/Mohshara MA 4218	Special Branch KP PR 4008	Peshawar City Police PR 4023	DPO/Shangla SH 4023	DPO/Sabi SU 4013	DPO/Swat SW 4042	Mini Total
SP7	Special Police Force (Fixed Pay)	150	100	100	100	45	300	30	1350	500	170	300	5570
													5570

Distribution of Funds													
Code	Objects	DPO/Abbottabad AD 4022	DPO/Buner BD 4012	DPO/Chamadda CA 4016	CTD KP PR 4013	DPO/Taxi Char TG 4001	DPO/Chahal CL 4006	DPO/Dit Lower DA 4021	DPO/Dixhan DI 4039	DPO/Dit Upper DP 4016	DPO/Hangu HG 4013	DPO/Hafiz HR 4009	Mini Total
A11	Total Pay Related Expenses	18,000,000	144,000,000	72,000,000	18,000,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,500,000
A11-1	Total Pay	18,000,000	144,000,000	72,000,000	18,000,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,500,000
A11-2	Total Pay of Other Staff	18,000,000	144,000,000	72,000,000	18,000,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,500,000
A21-156	Total Basic Pay of Contract Staff	18,000,000	144,000,000	72,000,000	18,000,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,500,000
SP7	Special Police Force (Fixed Pay)	18,000,000	144,000,000	72,000,000	18,000,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,500,000
G. Total:		18,000,000	144,000,000	72,000,000	18,000,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,500,000
Total Rs. (in Million)		18,000	144,000	72,000	18,000	54,000	36,000	189,000	18,000	114,300	18,000	30,500	711,500

Distribution of Funds													
Code	Objects	DPO/Kohistan KD 4017	DPO/Khatl KT 4043	DPO/Lalji LK 4002	DPO/Manshra MA 4027	DPO/Mardan MR 4033	DPO/Mohshara MA 4218	Special Branch KP PR 4008	Peshawar City Police PR 4023	DPO/Shangla SH 4023	DPO/Sabi SU 4013	DPO/Swat SW 4042	Mini Total
A11	Total Pay Related Expenses	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	5,400,000	248,400,000	144,000,000	30,500,000	432,000,000	1,002,600,000
A11-1	Total Pay	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	5,400,000	248,400,000	144,000,000	30,500,000	432,000,000	1,002,600,000
A11-2	Total Pay of Other Staff	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	5,400,000	248,400,000	144,000,000	30,500,000	432,000,000	1,002,600,000
A21-156	Total Basic Pay of Contract Staff	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	5,400,000	248,400,000	144,000,000	30,500,000	432,000,000	1,002,600,000
SP7	Special Police Force (Fixed Pay)	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	5,400,000	248,400,000	144,000,000	30,500,000	432,000,000	1,002,600,000
Total:		27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	5,400,000	248,400,000	144,000,000	30,500,000	432,000,000	1,002,600,000
Total Rs. (in Million)		27,000	18,000	18,000	18,000	7,200	54,000	5,400	248,400	144,000	30,500	432,000	1,002,600

C.T. 2016

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BETTER COPY

The Government of Khyber Pakhtunkhwa is pleased to accord sanction to the extension in the contract period of 9525 personnel of the following Special Police Force for a further period of 03 years with effect from 1st July, 2016 to 30th June, 2019 on fixed pay (Rs. 15000/- per month) subject to observance of all codal formalities and laid down procedure as per detail of strength and funds below:-

Distribution of Strength

continued on 2nd row below.

Codes	Ranks	DPO/Abbottabad AD 4020	DPO/Bunair BD 4012	DPO/Charsadda CA 4016	CTD KP PR 4913	DPO/Torghar TG 4001	DPO/Chitral CL 4006	DPO/Dirlower DA 4021	DPO/D.IKhan D.I 4039	DPO/Dirupper DP 4016	DPO/Hangu HG 4013	DPO/Haripur HR 4009	Mini Total
P07	Special Police force (fixed pay)	100	800	400	100	300	200	1060	100	635	100	170	5955

2nd row

Codes	Ranks	DPO/Kohistan KD 4017	DPO/Kohat KT 4043	DPO/Lakki LK 4002	DPO/Manshra MA 4027	DPO/Mardan MR 4033	DPO/Noshetra NR 4218	Special Branch KP PR4953	Peshawar city police PR4993	DPO/Shangla SH 4023	DPO/Swabi SU 4013	DPO/Swat SW 4042	Mini total	G. Total
P07	Special police force fixed pay	150	100	100	100	40	300	30	1580	800	170	2400	5570	9525

Distribution of Fund

continued on 2nd row below

Codes	Objects	DPO/Abbottabad AD 4020	DPO/Bunair BD 4012	DPO/Charsadda CA 4016	CTD KP PR 4913	DPO/Torghar TG 4001	DPO/Chitral CL 4006	DPO/Dirlower DA 4021	DPO/D.IKhan D.I 4039	DPO/Dirupper DP 4016	DPO/Hangu HG 4013	DPO/Haripur HR 4009	Mini Total
P01	Total pay related expenses	18,000,000	144,000,000	72,000,000	18,004,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,900,000
AD11	Total pay	18,000,000	144,000,000	72,000,000	18,004,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,900,000
AD11-2	Total pay of other staff	18,000,000	144,000,000	72,000,000	18,004,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,900,000
AD1156	Total basic pay of contract staff	18,000,000	144,000,000	72,000,000	18,004,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,900,000
SP07	Special Police force fixed pay	18,000,000	144,000,000	72,000,000	18,004,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,900,000
G. Total		18,000,000	144,000,000	72,000,000	18,004,000	54,000,000	36,000,000	189,000,000	18,000,000	114,300,000	18,000,000	30,500,000	711,900,000
Total Rs. (in million)		18,000	144,000	72,000	18,000	54,000	36,000	189,000	18,000	113,800	18,000	30,500	711,900

Codes	Objects	DPO/Kohistan KD 4017	DPO/Kohat KT 4043	DPO/Lakki LK 4002	DPO/Manshra MA 4027	DPO/Mardan MR 4033	DPO/Noshetra NR 4218	Special Branch KP PR4953	Peshawar city police PR4993	DPO/Shangla SH 4023	DPO/Swabi SU 4013	DPO/Swat SW 4042	Mini total	G. Total
A01	Total pay related expenses	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	54,000,000	248,400,000	144,000,000	30,600,000	432,000,000	1,002,600,000	1,714,500,000
A011	Total pay	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	54,000,000	248,400,000	144,000,000	30,600,000	432,000,000	1,002,600,000	1,714,500,000
AD11-2	Total pay of other staff	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	54,000,000	248,400,000	144,000,000	30,600,000	432,000,000	1,002,600,000	1,714,500,000
AD1156	Total basic pay of contract staff	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	54,000,000	248,400,000	144,000,000	30,600,000	432,000,000	1,002,600,000	1,714,500,000
SP07	Special Police force fixed pay	27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	54,000,000	248,400,000	144,000,000	30,600,000	432,000,000	1,002,600,000	1,714,500,000
Total		27,000,000	18,000,000	18,000,000	18,000,000	7,200,000	54,000,000	54,000,000	248,400,000	144,000,000	30,600,000	432,000,000	1,002,600,000	1,714,500,000
Total Rs (in million)		27,000	18,000	18,000	18,000	7,200	54,000	54,000	248,400	144,000	30,600	432,000	1,002,500	1,714,500

Attested
[Signature]

The expenditure involved is debited to the function 03-Public Order and Salary Affairs 032-Police 032102-Provincial police AD1156-Pay of contract staff NC21014(010) and will be met out through Supplementary Budget Grant for the current financial year. For the subsequent final years 2017-18 and 2018-19 allocation for fixed salaries of these contract employees shall be made in the annual budget estimates accordingly.

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SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA
HOME & TAS DEPARTMENT, PESHAWAR

No. BO-IIIFD/7-1/2016-17

Dated: 09-08-2016

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

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officers, Abbottabad, Buner, Charssada, Torghar, Chitral, Dir lower, D.I Khan, Dir upper, Hangu, Haripur, Kohistan, Kohat, Lakki, Manshera, Mardan, Nowshera, Shangla, Swabi and Swat.

30

HAYAT UR REHMAN
BUDGET OFFICER-III
FINANCE DEPARTMENT

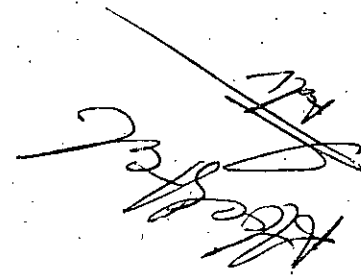
No. SO(7) HD/15-29/2015


Dated: 01-08-2016

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

1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. The Budget Officer-III Government of Khyber Pakhtunkhwa, Finance Department, Peshawar w/r to his office letter No. BO-IIIFD/7-1/2016-17 dated: 19-07-2016.

(KHAN MEHMOOD)
SECTION OFFICER (BUDGET)
HOME & TAS DEPARTMENT



Attested


ORDER.

My this order will disposed off in absence case of SPO Constable Muhammad Tahir No.33 who while posted in Police Lines Lakki Marwat absented himself from Govt. duty as per detail given below:-

1. 24.05.2015 to 25.05.2015 vide DD No.5 dated 24.05.2015 = (01 day)
2. 20.07.2015 to 21.05.2015 vide DD No.16 dated 20.07.2015 = (01 day)
3. 24.08.2015 to 23.09.2015 vide DD No.12 dated 24.08.2015 = (29 days)
4. 18.09.2015 to 23.09.2015 vide DD No 31 dated 18.09.2015 = (05 days)
5. 29.11.2015 to 18.12.2015 vide DD No.19 dated 29.11.2015 = (20 days)
6. 24.03.2016 to 06.04.2016 vide DD No.8 dated 24.03.2016 = (13 days)
7. 14.06.2016 to till date vide DD No.49 dated 14.06.2016

Moreover, inspite of above absence he is still absent from 14.06.2016 and there is no hope of his return for duty.

Keeping in view of above his further retention in Police Deptt: is no more required, hence dismissed from service from last absence i.e 14.06.2016.

OB No. 3501
Dated 23/9 /2016

No. 8951-52:1

NY 27-9-076

Copy to EC/OHC/PO to make recovery if any drawn after 14.06.2016.

Naqvi
District Police Officer
Lakki Marwat

District Police Officer
Lakki Marwat

*Attest
A. H. V.*

ADDITIOE (E)

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NA

ORDER.

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My this Order will disposed off the absence of SPO Constable Amjad Abbas No. 35 (Mechanic) who while posted at Police Lines Lakki Marwat absented himself from the Government duty without any leave or permission w.e.f 18.08.2016 till dated and there is no hope of his returned back for duty. Moreover on 28.08.2016 Govt: pick up of PP City Lakki was damaged during Patrolling. For repair of vehicle the said SPO Constable was contacted for repair of vehicle but he clearly refused. A report to this effect has been entered vide DD No. 12 dated 28.08.2016.

Keeping in view of above the undersigned reached to the conclusion that his further retention in the discipline force is not beneficial in Police Department, hence he is dismissed from service from date of absence i.e 18.08.2016.

No. 349 /

Dated: 23/9 /2016.

[Signature]
District Police Officer
Lakki Marwat

No. 8953-54/1

DT 27-09-016

Copy to EC/OHC/PO to make recovery if any drawn after 18.08.2016.

[Signature]
Adv

District Police Officer
Lakki Marwat

[Signature]
[Signature]

محترم جناب محترم ڈپٹی انسپکٹر جنرل آف پولیس، بنوں ریجن بنوں۔

تھکانا ایبل برخلاف حکم برخوانگی جاریہ جناب محترم ڈسٹرکٹ پولیس آفیسر کی مردت مورخہ 27/09/2016 جس کی رو سے من ایپلانٹ کو زبانی یا تحریری جواب طلب، نوٹس اور شو کا نوٹس کے اور بغیر کسی شہدائی کے ملازمت سے بوجہ مبینہ غیر حاضری درخواست کیا گیا ہے۔ جس میں سابقہ IMTO آجمل خان کی من ایپلانٹ کے ساتھ ذاتی بغض اور عناد شامل ہے، کیونکہ وہ من ایپلانٹ کو غلط بل بنانے پر مجبور کر رہا تھا۔

استدعا ایبل۔ بمظہوری تھکانا ایبل ہذا حکم برخوانگی جناب محترم ڈسٹرکٹ پولیس آفیسر کی مردت مورخہ 27/09/2016 کو سنوں و کا اقدام قرار دیا جا کر من ایپلانٹ کو اپنی ملازمت پر بحال کرنے کا حکم صادر فرمایا جاوے، تاکہ قانون اور انصاف کے تقاضے پورے ہو سکیں۔

استدعا ایبل

۱۔ ایپلانٹ عاجز اندہ طور پر ذیل ایبل پیش کرتا ہے۔
یہ کہ من ایپلانٹ سال 2014ء میں بطور کنسٹیبل (SPO) میکنگ بھرتی ہوا تھا۔ اور اپنی ڈیوٹی انتہائی محنت اور ایمانداری سے سرانجام دے رہا تھا۔ کبھی اپنے آفسران بالا کو معمولی شکایت کا موقع نہیں دیا ہے۔

جناب عالی۔

۲۔ یہ کہ سابقہ IMTO آجمل خان جو من ایپلانٹ کو سرکاری گاڑیوں کی مرمتی کے بابت غلط اور بگس بل بنانے پر اصرار کرتا اور بیچانے 1000 خرچ کے ٹھہرے دس، پندرہ ہزار کے بل اور کوشش بنوانے کا اصرار کرتا رہا۔ اگر ایپلانٹ نے سبایات صاف انکار کیا تھا۔ جس کی وجہ سے آجمل خان مذکور کے دل میں من ایپلانٹ کے ساتھ ذاتی بغض و عناد پیدا ہوئی تھی۔

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۳۔ یہ کہ آجمل خان سابقہ MTO نے من ایپلانٹ کی جانب سے اس کی مرضی کے مطابق غلط اور بگس بل بابت مرمتی سرکاری گاڑیوں سے انکار کرنے کی وجہ سے ٹھہرے راستے سے ہٹانے کے لئے من ایپلانٹ کو غیر حاضر کر دانا شروع کیا تھا۔ اور اس بابت من ایپلانٹ کو عوامی اندھیرے میں رکھا گیا تھا۔ کیونکہ من ایپلانٹ کو کبھی بھی دن کی غیر حاضری بابت کوئی زبانی یا تحریری جواب طلبی تک کے لئے نہیں کہا گیا ہے۔ جو کہ قانوناً ضروری تھا۔ درحقیقت من ایپلانٹ نے کوئی غیر حاضری نہیں کی ہے۔ اور مبینہ غیر حاضری کے دوران آٹھ پولیس کے سرکاری گاڑیوں کی مرمت بھی کی ہے، ایسی صورت میں من ایپلانٹ اپنی ڈیوٹی سے کیے بغیر حاضر ہوا تھا۔

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۴۔ یہ کہ من ایپلانٹ کو صرف ایک بار آجمل خان سابقہ MTO کی جانب سے غیر حاضر کروانے کا علم، وا تو اس بابت جناب محترم ڈسٹرکٹ پولیس آفیسر صاحب کی مردت کو تحریری درخواست پیش کی، جس پر جناب محترم ڈسٹرکٹ پولیس آفیسر صاحب نے میری پولیس لائن کی مردت کے روزنامہ میں حاضری لگوانے کی ہدایت فرمانے پر من ایپلانٹ کو

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Attest
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ڈیوٹی پر حاضر ظاہر کیا گیا۔ تاہم آجمل خان MTO مذکورہ رقیبت پر نکتے اپنے راستہ تہ بنانے پر تو
مجھے میری لائسنس میں غیر حاضر کردا تا رہا۔

5- جناب والا MIT سٹاف کے تمام ڈرائیور حضرات سے تسلی کر سکتے ہیں۔ کہ من ایپلانٹ نے کبھی بھی گاڑی سرتی سے
ازکار نہیں کیا ہے۔ خواہ دن ہو یا رات کسی بھی وقت ہوتھا نہ جو کیا ت پر بھی گاڑی سرتی کیلئے جاتا رہا ہوں۔

6- یہ کہ من ایپلانٹ بدستور اپنی ڈیوٹی پہلے کی طرح محنت اور ایمانداری سے سرانجام دے رہا تھا کہ مجھے اچانک مورخہ
27/09/2016 کو ملازمت سے برخاست کیا گیا۔ اور میرے خلاف حکم برخواستگی میں جو وجوہات پیش کئے گئے
ہیں۔ اس بابت من ایپلانٹ کو کوئی شک و کاوش یا جواب طلبی تک نہیں دی گئی ہے۔ نہ ہی من ایپلانٹ کو شنوائی کا کوئی
موقع تک نہیں دیا گیا ہے۔ جو کہ حکم برخواستگی مورخہ 27/09/2016ء سے صاف واضح ہے۔ نقل لف ہے۔

7- یہ کہ من ایپلانٹ ایک فریب ماندان سے تعلق رکھتا ہوں۔ جس کی کفالت کا انحصار من ایپلانٹ کی ماہانہ تنخواہ پر ہے۔
اس لئے من ایپلانٹ انسانی ہمدردی کے تحت اپنی ملازمت پر بحال ہونے کا حقدار ہوں۔

8- یہ کہ ایبل ہذا اندر معیار اور قابل پذیرائی ہے۔

9- یہ کہ آخر میں من ایپلانٹ یہ استدعا کرتا ہوں کہ آجناب میری فریاد / اپیل سننے کے لئے ملاقات کا شرف بخشیں تاکہ
من ایپلانٹ بزبانی طور پر بھی اپنی بے گناہی کی وضاحت / تفصیل پیش کر سکوں۔

لہذا استدعا ہے کہ منظور کی اپیل ہذا حکم برخواستگی من سائل از ملازمت جاریہ جناب محترم ڈسٹرکٹ پولیس
آفیسر صاحب کی مروت مورخہ 27/09/2016 نمبر 54-8953 کو کا اہدم و منسوخ قرار دیا جا کر من ایپلانٹ
کو اپنی ملازمت پر دوبارہ بحال کروانے کا حکم صادر فرمایا جاوے۔

دعا گور ہونگا۔ مورخہ 14-10-2016

اپیلانٹ۔ محمد طاہر سابقہ کینٹنل S.P.O سیکٹنگ نمبر 33 پولیس لائن سٹیٹ کی مروت۔

موبائل نمبر۔ 0312-9865298

بیان حلفی مورخہ 14-10-2016

حلفاً بیان کرتا ہوں کہ جملہ مراتب اپیل ہذا انا خود میرے علم
و یقین سے درست تسلیم ہیں کوئی امر پوشیدہ نہیں رکھی گئی ہے۔

التعبیر۔

محمد طاہر (اپیلانٹ)



17/10/16

Handwritten signature and initials.

ANZA (37)
24

PESHAWAR HIGH COURT,
BANNU BENCH
(Judicial Department)

W.P.No. 816-B/2017

Muhammad Tahir

Versus

Govt. of KPK and others.

JUDGMENT

Date of hearing: 10.12.2018

Appellant-petitioner By Shahid Sabar

Musa Khel Adv.

Respondent By Shahid Hameed Raza

Adv. A.G.

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SHAKEEL AHMAD, J.- Through this constitutional petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioners seek following relief:-

"On acceptance of this Writ Petition, the impugned termination orders dated 23-9-2016 of the petitioners may please be declared as illegal, unlawful, without lawful authority, against the fundamental rights of the petitioners as such the same be declared null and void. It is further prayed that respondents may further be directed to

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ATTESTED
JUDGE
Peshawar High Court
Bannu Bench

Attested
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reinstate the petitioners in service with all back benefits including salaries and benefit of office order dated 18-8-2016 of respondents may also be extended to the petitioners in accordance with law and respondents may kindly be directed to adjust the services of petitioners on permanent basis and may be regularized as per rules, regulations and policy/law. Any other remedy which deems fit and proper according to the circumstances of the case may also be granted".

2. Succinctly the facts of the case are that the petitioners belong to district Lakki Marwat and vide order dated 19-06-2014 the petitioners were appointed in Special Police Force in police department being Auto Mechanic and Auto Electrician on fixed pay @ Rs.15, 000/-per month (contract basis) w.e.f 10-06-2014 and ultimately they were terminated from services, vide order dated 23-9-2016 on account of their absence from duty. Not contented with the same, the petitioners filed

ATTESTED
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 CLERK
 Peshawar High Court
 Daska Bench

[Handwritten signatures]

departmental appeals but invain. Hence, the instant Writ petition.

3. It was argued by the learned counsel for the petitioners that the allegations of absence from duty is false, the petitioners are still performing their duties as SPO; that they have been terminated from their services with malafide intention; that the respondents pressurized them to prepare bogus bills of mechanic fault in the official vehicles but on their refusal, they were terminated from services; that the petitioners also moved departmental appeals to the respondents but invain.

4. On the other hand, learned AAG appearing on behalf of the official respondents assisted by representative of the department argued that both the petitioners have willfully absented themselves from their duties and ultimately they were dismissed from services. He next contended that the department respondents never pressurized the petitioners to prepare bogus bills as contended by the learned counsel for the petitioners. He lastly contended that the plea urged before the court is purely factual in nature, which cannot be decided without recording pro and contra evidence, and prayed for dismissal of instant Writ Petition.

5. Perusal of the record reveals that the petitioner No.1 absented himself from duty without seeking prior permission from the competent authority. H remained absent from duty for about 70 days, which is reflected from OB No.350 dated 23.9.2016 while petitioner No.2 absented himself since 18.06.2016 till the date of his dismissal from service vide OB NO.349 dated 23/9/2016. The plea urged before the court as

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ATTESTED
BY
Deputy High Comm
Madurai Region

Attested
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27

to whether the allegations of absence from duty is true or false and as to whether the petitioners were pressurized to prepare bogus bills or not, are purely factual in nature which cannot be answered without recording evidence and this exercise cannot be done in constitutional jurisdiction of this court.

6. For what has been discussed above, this petition is dismissed being not maintainable, however, the petitioners shall be at liberty to seek their relief before appropriate forum, if so desired.

Announced.
Dt: 10-12-2018.
Azmat Awan*

Handwritten notes:
17/12/18

(D.B)
Hon'ble Mr. Justice Muhammad Nasir Mahfooz
Hon'ble Mr. Justice Shakeel Ahmad.

CERTIFIED TO BE TRUE COPY

Examiner

Peshawar High Court Sanno Bench
Authorized Under Article 87 of
the Qanun-e-Shahadat Order 1988

Handwritten signature:
Attested
Adil

بخدمت جناب ڈپٹی انسپکٹر جنرل آف پولیس رتج بنوں۔

(28)

جدید محکمانہ اپیل برخلاف حکم برخاستگی مجریہ جناب محترم ڈسٹرکٹ پولیس آفیسر ضلع لکی مروت مورخہ
27/09/2016 جس کی رو سے من اپیلانٹ کو زبانی یا تحریری جواب طلبی، نوٹس اور شوکا ز نوٹس
اور بغیر کسی شنوائی کے ملازمت سے بوجہ مبینہ غیر حاضری کی بناء پر برخواست کیا گیا۔

استدعا اپیل:

بمظوری اپیل ہذا حکم برخواستگی جناب محترم ڈسٹرکٹ پولیس آفیسر ضلع لکی مروت مورخہ
27/09/2016 کو منسوخ و کالعدم قرار دیا جا کر من اپیلانٹ کو اپنی ملازمت پر بحال کرنے کا
حکم صادر فرمایا جاوے تاکہ قانون اور انصاف کے تقاضے پورے ہو سکیں۔

جناب عالی!

اپیلانٹ عاجزانہ طور پر ذیل اپیل پیش کرتا ہے۔
یہ کہ من اپیلانٹ سال 2014ء میں بطور کنسٹیبل (SPO) ملکیٹک بھرتی ہوا تھا۔ اور اپنی ڈیوٹی
انتہائی محنت اور ایمانداری سے سرانجام دے رہا تھا۔ کبھی اپنے افسران بالا کو معمولی شکایت کا موقع
نہیں دیا ہے۔

یہ کہ سابقہ IMTO اجمل خان جو من اپیلانٹ کو سرکاری گاڑیوں کی مرمتی کے بابت غلط اور بوگس
بل بنانے اور اصرار کرتا اور پچانے 1000 خرچ کے مجھ سے دس، پندرہ ہزار کے بل اور کوٹیشن
بنوانے کا اصرار کرتا رہا۔ مگر اپیلانٹ نے اس بابت صاف انکار کیا تھا۔ جس کی وجہ سے اجمل خان
مذکور کے دل میں من اپیلانٹ کیساتھ ذاتی بغض و عناد پیدا ہوا تھا۔

یہ کہ اجمل خان سابقہ MTO نے من اپیلانٹ کی جانب سے اس کی مرضی کے مطابق غلط اور
بوگس بل بابت مرمتی سرکاری گاڑیوں سے انکار کرنے کی وجہ سے مجھے راستے سے ہٹانے کیلئے من
اپیلانٹ کو غیر حاضری کروانا شروع کیا تھا۔ اور اس بابت من اپیلانٹ کو عہد اندھیرے میں رکھا گیا
تھا۔ کیونکہ من اپیلانٹ کو کبھی بھی دن کی غیر حاضری بابت کوئی زبانی یا تحریری جواب طلبی تک کیلئے
نہیں کیا گیا ہے۔ جو کہ قانوناً ضروری تھا۔ درحقیقت من اپیلانٹ نے کوئی غیر حاضری نہیں کی ہے
اور مبینہ غیر حاضری کے دوران محکمہ پولیس کے سرکاری گاڑیوں کی مرمت بھی کی ہے ایسی صورت
میں من اپیلانٹ اپنی ڈیوٹی سے کیسے غیر حاضر ہوا تھا۔

Attest
[Signature]

(4)

یہ کہ من ایپلانٹ کو صرف ایک بار اجمل خان سابقہ MTO کی جانب سے غیر حاضر کروانے کا علم ہوا تو اس بابت جناب محترم ڈسٹرکٹ پولیس آفیسر صاحب ضلع لکی مروت کو تحریری درخواست پیش کی، جس پر جناب محترم ڈسٹرکٹ پولیس آفیسر صاحب نے میری پولیس لائن لکی مروت کے روزنامچے میں حاضری لگوانے کی ہدایت فرمانے پر من ایپلانٹ کو ڈیوٹی پر حاضر ظاہر کیا۔ تاہم اجمل خان MTO مذکور ہر قیمت پر مجھے اپنے راستہ سے ہٹانے پر مجھے میری لاعلمی میں غیر حاضر کروا تا رہا۔ یہاں اس امر کا ذکر نا بھی ضروری ہے کہ محکمہ کی کوئی ورکشاپ تاجہ زئی میں نہ ہے اور سائل محکمہ کی تمام تر گاڑیوں کی مرمت وغیرہ ورکشاپ واقع لکی مروت میں کرتا چلا آیا اور افسران کی اجازت سے ہی تمام تر امور سرانجام دیتا رہا جو کہ لکی شہر و تاجہ زئی کے درمیان 20/25 کلومیٹر کا فاصلہ ہے اور افسران بالا کی ہدایت کے مطابق سائل روزانہ تاجہ زئی حاضری لگوانے نہ جاسکتا تھا اور تمام تر کام / مرمت وغیرہ ورکشاپ / دکان واقع لکی مروت میں سرکاری گاڑیوں کی مرمت کرتا تھا۔ بدیں وجہ سائل کو غیر حاضر قرار دینا سراسر نا انصافی ہے۔

(5)

یہ کہ من ایپلانٹ بدستور اپنی ڈیوٹی پہلے کی طرح محنت اور ایمانداری سے سرانجام دے رہا تھا کہ مجھے اچانک مورخہ 27/09/2016 کو بلازمت سے درخواست کیا گیا۔ اور میرے خلاف حکم برخواستگی میں جو وجوہات پیش کئے گئے ہیں اس بابت من ایپلانٹ کو کوئی شوکانوٹس یا جواب طلبی تک نہیں دی گئی ہے۔ نہ ہی من ایپلانٹ کو شنوائی کا کوئی موقع تک نہیں دیا۔ جو کہ حکم برخواستگی مورخہ 27/09/2016 سے صاف واضح ہے۔ نقل لف ہے۔

(6)

یہ کہ مورخہ 27/09/2016 کے خلاف رٹ پٹیشن نمبر 816 سال 2017 دائر کی گئی جو حکم مورخہ 10/12/2018 کو خارج ہوا اور Proper forum سے رجوع کرنے کی ہدایات کی گئیں دریں بارہ آنجناب کو جدید محکمانہ اپیل گزاری جا رہی ہے۔

(7)

یہ کہ من ایپلانٹ ایک غریب خاندان سے تعلق رکھتا ہوں۔ جس کی کفالت کا انحصار من ایپلانٹ کی ماہانہ تنخواہ پر ہے۔ اس لئے من ایپلانٹ انسانی ہمدردی کے تحت اپنی ملازمت پر بحال ہونے کا حقدار ہوں۔

(8)

یہ کہ اپیل ہذا اندر معیاد اور قابل پذیرائی ہے۔

(9)

یہ کہ آخر میں من ایپلانٹ یہ استدعا کرتا ہوں کہ آنجناب میری فریاد / اپیل سننے کے لئے ملاقات کا شرف بخشیں تاکہ من ایپلانٹ زبانی طور پر بھی اپنی بے گناہی کی وضاحت / تفصیل پیش کر سکوں۔

(30)

لہذا استدعا ہے کہ منظور ہونے کے بعد اپیل ہذا حکم برخواستگی اپیلانٹ از ملازمت مجاریہ
جناب محترم ڈسٹرکٹ پولیس آفیسر صاحب ضلع کلکتہ مروت مورخہ
27/09/2019 نمبر 54-8953 کو کالعدم و منسوخ قرار دیا جائے۔
اپیلانٹ کو اپنی ملازمت پر دوبارہ بحال کرنے کا حکم صادر فرمایا جاوے۔
دعا گورہوگا۔

مورخہ 04/01/2019

محمد طاہر سابقہ کنستبل SPO مکینک نمبر 33 پولیس لائن

ضلع کلکتہ مروت۔۔۔۔۔ (اپیلانٹ)

موبائل نمبر: 9865298-0312

TAHIR

بیان حلفی

حلفاً بیان کرتا ہوں کہ جملہ مراتب اپیل ہذا
تاحد علم و یقین درست و صحیح ہیں اور تمام امور سچ پر مبنی ہیں۔
کوئی امر آنجناب سے مخفی و پوشیدہ نہ رکھا ہے۔
محمد طاہر۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔۔ (اپیلانٹ)

TAHIR

Hastal
Tahir

"A"

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

No.

479

109

APPEAL No..... of 20

Mohammad Taher

Appellant/Petitioner

Versus

Through 197. KPK Pesh.

RESPONDENT(S)

Res: 010-2

*Deputy Inspector General
of Police Barina Region
Barina.*

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 22-6-2017 at 7:00 AM at.....

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.

at Camp Court D.I. Khan

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

IB

APPEAL No. 479 of 2019.

Mohammad Tahir

Appellant/Petitioner

Versus

Through - IGP, K.P.S. Pesh.

RESPONDENT(S)

Res. No. 3

Notice to Appellant/Petitioner

at the Police Office
Lahore

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 22-6-2021 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.

at Camp Court D-1. Khan

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

"A"

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

No.

APPEAL No..... of 20

479

19

T.B

Mohammad Tabir

Appellant/Petitioner

Versus

Through 1st, 2nd & 3rd

RESPONDENT(S)

Notice to Appellant/Petitioner

Permanently

*Motor Transport officer
Peshawar Line*

Lateki Marmat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal

on *22-6-2021* 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.

at Camp Quater D.I. Khan

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

[Signature]

"A"

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

TB

No.

APPEAL No. 479 of 20 17

Mr. Mohammad Tahir

Appellant/Petitioner

• Versus

Through 15P. 16.P. P. S. S.

RESPONDENT(S)

Res. No. I

Notice to Appellant/Petitioner

Quit. of 16.P. through
15P. P. S. S.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 22-6-2021 1:00 PM at

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.

at Camp Court. D. 1. 15 bar

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

23-06-21

"B"

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

TB D/IG

No.

Appeal No. 679 of 2009

Muhammad Tahir Appellant/Petitioner

Versus

IG Respondent

Respondent No. 2

Notice to:

Chief Inspector General of Police (Baru Region)

An appeal/petition under the provision of the Khyber Pakhtunkhwa Tribunal Act, 1974, has been presented/registered for consideration, in the Province of Khyber Pakhtunkhwa and notice has been ordered to issue. You are hereby notified that the said appeal/petition is fixed for hearing before the Tribunal at Peshawar on 11/20/2009 at 8.00 A.M. If you wish to urge anything against the appeal/petition you are at liberty to do so on the date fixed, or any other day to which it may be postponed either in person or by authorised representative or by any other person duly supported by your power of Attorney. You are, therefore, required to file in writing at least seven days before the date of hearing 4 copies of written statement and any other documents upon which you rely. Please also take notice that in the event 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 sent 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 Registrar has given in the appeal/petition will be deemed to be your correct address, and further notices 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

Day of 11/20/2009

at camp court
D/IG

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

for Reply (last chance)

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.

Appeal No. 479 of 20 69 ^{1 B D/K}
Mahd Tahir Appellant/Petitioner

Versus
IGP Peshawar Respondent

Respondent No. 3

Notice to: — DIST Police office Lalaki
Mardan

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 22/11/2021 at 8.00 A.M. If you wish to urge anything against the appellants/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 10.....

Day of..... 11 20 21

at camp court D/K
(for Reply last chance)



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.

TR DIK

No.

Appeal No. 479 of 2009

M. Tabir Appellant/Petitioner

IGP Pesh Respondent

Respondent No. 4

Notice to: - Motor Transport officer
Police line LAKKI MARWA F

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 22-11-09 at 8.00 A.M. If you wish to urge anything against the appellants/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 16

Day of 11 2009

at Camp Court

D/K/S

for Reply last chance

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 DIK

Appeal No. 479 of 20 09

Mohd. Tahir Appellant/Petitioner

Versus

Through IGP Pesh Respondent

Respondent No. 1

Notice to:

— Inspector General of Police
KPK Pesh

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 22/11/2021 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.

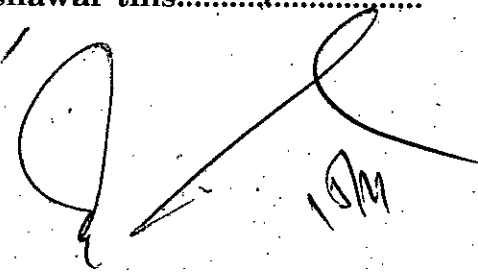
Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 10

Day of 11.20 21

at court
P/Khan

(for Reply last chance)



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.