10th Nov, 2022

Due to public holiday on account of Allama Iqbal Day, the case is

adjourned to 07.12.2022 for the same as before.

Reader

05.07.2022

Muhammad Javid Khan Advocate present and submitted Wakalat Nama in favor of appellant.

Being freshly engaged, learned counsel for appellant requested for adjournment. Adjourned. To come up for preliminary hearing on 04.08.2022 before S.B at Camp Court, Swat.

(Rozina Rehman) Member (J) Camp Court, Swat

4.8.22

sue to sammer weatin The case is affairs sel to 4-10-22 for the same.

04.10.2022

Learned counsel for the present. Mr. Shams-ur-Rehman, S.I (Legal) alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Comments in consequence of pre-admission notice have already been submitted by the respondents. Let the appeal be admitted for regular hearing subject to all legal and valid objections including the question of limitation. The appellant is directed to deposit security fee within 10 days. To come up for rejoinder, if any, as well as arguments on 09.11.2022 before the D.B at Camp Court Swat.

(Salah-Ud-Din) Member (J)

Camp Court Swat

Counsel for the appellant present.

Learned counsel for the appellant requested for adjournment on the ground he has not prepared the brief. Last opportunity granted. To come up for preliminary hearing before the S.B on 08.06.2022 at camp court Swat.



(Kalim Arshad Khan) Chairman

8th June, 2022

Appellant in person present.

Counsel are on strike. To come up for preliminary hearing on 09.06.2022 before the S.B at camp court Swat.



(Kalim Arshad Khan) Chairman Camp Court Swat

9th June, 2022

Appellant in person present.

Counsel are on strike. To come up for preliminary hearing on 04.07.2022 before the S.B at camp court Swat.

(Kalim Arshad Khan) Chairman Camp Court Swat 01.11.2021

Appellant in person and Mr. Kabirullah Khattak, Addl: AG for respondents present.

Learned AAG requested for further time to submit written reply. Granted. To come up for reply/preliminary hearing on 05.01.2022 before S.B.

(Mian Muhammad) Member(E)

05.01.2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Amjad Alam, Assistant for respondents present.

Representative of the respondents has submitted written reply/comments. Placed on file. Learned counsel for the appellant requested for adjournment. Last opportunity is granted. To come up for preliminary hearing on 02.03.2022 before S.B.

(Rozina Rehman) Member (J)

2-3-2022

Due to retirement of the House Chairman the case is adjourned to come up for the same as before an $1-\frac{1}{2022}$

leader

20.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 05.08.2021 for the same as before.

/ Reader

05.08.2021

Counsel for the appellant present. Pre-admission notice be issued to the respondents. To come up for written reply/preliminary hearing on 06.10.2021 before S.B.

Chairman

06.10.2021

Mr. Kamran Khan, Advocate, for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for submission of reply/comments as well as preliminary hearing before the S.B on 01.11.2021.

(SALAH-UD-DIN) MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

	Court	of
4 4 A	Case No	15909 12020
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/12/2020	The appeal of Mr. Muhammad Usman presented today by Mr. Shahzaullah Yousafzai Advocate may be entered in the Institution Register
	\ \	and put up to the Worthy Chairman for proper order please. REGISTRAR
2-	ž ž	This case is entrusted to S. Bench for preliminary hearing to be put up there on 2501201.
		CHAYRMAN
25.0	pre is	Mr. Shahzullah Yousafzai, Advocate, for appellant is sent. He requested for adjournment due to non-paration of the brief of the instant appeal. The request acceded to, the appeal is adjourned to 20.04.2021 on
	S.f	ch date file to come up for preliminary hearing before
		(MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. 15909 /2020

MUHAMMAD USMAN VS POLICE DEPARTMENT

INDEX

S.NO.	DOCUMENTS Y	ANNEXURE	PAGE
1.	Memo of appeal	**********	1-4
2.	Condo nation application		5-6
3.	Copy of FIR	Α	7
4.	Copies of source reports	В	8-9
5.	Copy of second FIR	C	10
6 .	Copy of impugned order	D	11
7	Copy of mercy petition	E	12
8	Statement of moharir	F	13
9	Copy of inquiry	G	14-15
10	Copy of departmental appeal	Н	16
6.	Vakalat nama	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	17

APPELLANT

THROUGH:

SHAHZULLAH YOUSAFZAI ADVOCATE

Flat no 4, Upper Floor, Juma khan plaza near FATA secretariat, Warsak road, Peshawar 0302-8578851

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO/2020	
Mr. Muhammad Usman Ex: Constable No.282, District security Branch, District Shangla.	APPELLANT

VERSUS

- 1- The Inspector General Of Police Khyber Pakhtunkhwa, Peshawar.
- 2- The Regional Police Officer Malakand Region, At Saidu Sharif Swat.

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 02/01/2009 COMMUNICATED TO APPELLANT ON 25/07/2020 WHEREBY MAJOR PENALTY OF DISMISSAL FROM SERVICE WAS IMPOSED ON APPELLANT AND AGAINST THE IN ACTION OF RESPONDENTS BY NOT DECIDING DEPARTMENTAL APPEAL OF APPELLANT WITHIN STATUTORY PERIOD OF NINTEY DAYS.

PRAYER:

That on acceptance of this appeal the impugned order dated O2/01/2009 may kindly be set aside and the appellant may please be re instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH: ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That appellant was serving the respondents department as constable quite efficiently and up to the entire satisfaction of his superiors.
- 2- That it is pertinent to mention here that in 2008 militancy and terrorism was at its peak in the whole province and specially in malakand division therefore the appellant was posted in district security branch for tracing and collection of information regarding terrorists and transmitting the same to the high ups.

- That it is pertinent to mention here that a bomb was blast near dandai on pak army convoy in which three personnel sustained severe injuries while one embraced shahadat. That an FIR no.125 dated 22/08/2008 was registered against unknown terrorists in police station besham regarding the aforementioned incident. Copy of FIR is attached as annexure.

- 6- That the two terrorist namely ibrar and khorshid who were the local commanders of TTP in district shangla were charged by appellant through source reports for different terrorist activities and finally terrorist khorshid was killed in police encounter. That it is pertinent to mention here that both these commander were belonging to village dandai and they were the co-villagers of appellant. That after the murder of khorshid terrorist ibrar and other were giving life threats to appellant and his parents therefore the appellant being elder and sole supporter of his family was forced by her parents to leave the country to avoid the wrath of terrorists, hence the appellant left the country for Saudi arabia on the repeated requests of his parents.
 - 7- That the respondents issued the impugned order dated 02/01/2009 whereby the appellant was dismissed from service from the date of his absence. Copy of impugned order is attached as annexure.
 - 8- That in 2020 the appellant returned to Pakistan and the mother of appellant preferred mercy petition before

respondent no.2 for re instatement of appellant into service. That respondent no.2 refer the matter to respondents no.3 for inquiry and inquiry was conducted whereby the inquiry officer recommended the appellant for re instatement. Copies of mercy petition, statement of moharir PS Besham and inquiry report are attached as annexure.

- 10- That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds.

GROUNDS:

- A- That the impugned order dated 02/01/2009 communicated to appellant on 25/07/2020, whereby major penalty of dismissal from service was imposed on appellant, is against the law, facts and norms of natural justice hence not tenable in the eye of law and liable to be set aside.
- B- That the appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the appellant was not willful absent rather due to compelling reasons he went abroad. That the compelling reasons due to which appellant went abroad has been properly inquired and same has been found true and genuine in the inquiry report.
- D- That the inquiry officer has properly explained the reasons due to which the appellant went abroad and the stance of appellant has been found true during inquiry therefore the inquiry officer recommended the appellant for reinstatement into service.
- E- That no show cause notice, charge sheet and statement of allegation has been served on appellant before imposing major penalty of dismissal from service.
- F- That no regular inquiry has been conducted in the matter before imposing major penalty which is mandatory under the rules.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

MUHAMMAD USMAN

V/S

POLICE DEPARTMENT

APPLICATION FOR CONDONATION OF DELAY IN FILING THE ABOVE TITLE SERVICE APPEAL.

R/SHEWETH:

- 1- That the above title service appeal is successfully instituted in this honorable court in which no date for hearing has yet been fixed.
- 2- That it is pertinent to mention here that that in 2008 militancy and terrorism was at its peak in the whole country and specially in Malakand division.
- 3- That appellant was performing duty in District security branch shangla and his job description was to collect information regarding terrorists and their activities and to intimate the same to high ups.
- 4- That it is pertinent to mention here that on 22/08/2008 a bomb was blast on army convoy near dandai in which one army personnel embraced shahadat while three others sustained severe injuries. That an FIR no. 125 was registered against unknown terrorists on the same day. That the appellant submit source report to his high ups regarding the incident in which he charged two terrorists namely khorshid and ibrar for bomb blast on army convoy.
- 5- That on the above mentioned source report SHO police station Besham along with other constables Raided the house of terrorist knorshid on 27/08/2008 and on seeing the police party knorshid along with other terrorists open firing on police party as a result SHO and one constable embraced shahdat on the spot. That an FIR no.116 was registered regarding the aforementioned incident.
- 6- That it is very pertinent to mention here that both the above mentioned terrorists were co-villagers of the appellant and they had the knowledge that appellant was serving in DSB and information regarding their activities were conveyed to high ups by appellant therefore the above mentioned terrorist and other member of TTP shangla group were

giving life threats to appellant and his family. That appellant being elder son of his parents and sole supporter of his family was forced by his parents to leave the country in order to save his life and that of his family. That it is very pertinent to mention here that appellant left the country due to above stated compelling reasons.

- 7- That after his departure from the country the appellant was dismissed from service vide impugned order dated 02/01/2009. That appellant remained in Saudi Arabia and returned to Pakistan in 2020.
- 8- That after returning Pakistan in 2020 the appellant approached the respondents for joining duty but he was handed over the impugned dismissal order on 25/07/2020.
- **9-** That it is pertinent to mention here that delay in filing the instant appeal is due to above stated reasons.
- **10-** That the above stated reasons were beyond the control of appellant and constitute sufficient cause of action in term of section 5 of limitation act.

It is therefore, most humbly prayed that on acceptance of this application the delay in filing the instant appeal may kindly be condoned in the best interest of justice.

Dated: 10-12-2020

APPELLANT

MUHAMMAD USMAN

THROUGH:

SHAHZULLAH YOUSAFZAI ADVOCATE

مورتمن بهرلى يشادد باب بر 540/19 قاد مستور قعاد پائ بزارد جنوز مورد 23 ايريل 12007 إداد (عرم سنود بابر) منحاة م (علم) ا بتدائی اطلاعی ر بورث ابتدائی اطلاع نسبت جرم قابل دست اندازی پولس د پورٹ شدہ درید ندی ۱۹۴۶ محوصر صابط فو جداری قادم نمر ۱۲۲۵ - ۱۵ (۱) Sp ر الاقتدارورن 1.20:30 Ein 22/ 546 01601/ ركيفيت جرم (مدوفعه) حال اكر بكوليا كيابو_ 3.2/324/6/7ATA ع وقوعه فاصله تن نسسه اورممت رر رسا مراه رستم عقام لوندي دري طان جز - لهامل المودان والمراز المرك في يو د د المراد المراق والمواق عرائي والمراق وري الله وقيش كالماطلال درن كف ش وقف موا موقود بيان كرد مبررير كى عراسه مقور مراكم كواكنا. مروا كى كارت ووتت ابتدائی اطلاع نیجدرج کرو-رسری مرسلے منمانت قرریان خان کا کا معمر کا سرکر ریل سے آند كها م ليظام بغريبي رن الملائع على م ١٠٨١٤ مر مرد دري بشام وانترى ند جى فيرانك في الريرك داكى جويرخلاف وا ال(۱۰۰۰) عادمة العن رك دهار كياب المالي عليه والمساح . فاکسسٹری مرير 36 بالم رحنف ك نوجى جوال مين بك أب كا زمول من مری سے جانب مشام جا ہے تھے۔ کم بنیام الا سی غیام کا کرے بھرے کور رائی کی آئے۔ شامع ربع جورا فرجی جرائل نے بھی جاروں کمرت برائی فائر نس کی ہے۔ دور مرکز ہاؤ 11/0/2 3-192 مان نوشه و جارور به ما معلوم الله ماس رتب شامل یی رنبوجی جران سیم کا المیما مرے سے مریزان ہے، جائم المروع کے مطابق فرمومین سے بین صبحال لیگام میں اولیس کو سیان مرے ہے اریزان میں دی کی ہے، لغویت وقع کم سے مورت وم با الا کار واسل میزا العلم رہے ل والعرف المعام معرف مح المعاد الموائل في من أمره واسلم والموارة و الموارد و المعاد الموارد و المو

Altered

Scanned with CamScanner

13 Pago

P) DSB

Collos of

من علی از مرا المجمع المورد من کولون المرابی المحالی المرابی المرابی

13 Jan Stable

14/whid

عليه مالهالي

Bulo

من المراز المواد كر من المراز المرز المراز المراز المرز المرز المراز المراز المرز المراز المراز المراز المراز المراز الم

287-1062-2012m

Atternal

كونمشث پرلس چنادراب نبر (1940/54 ة دم شود قعالاد بزاده جنرات دول 23 ادر 12006 إلى فرزا قادم شوباند) ا بنز الى اطلاعى ريور ئ ابتدائى اطلار انست جرم قابل د ئ اندازى پوليس ريورث شده دريد ند ۱۵۴مجومه ضابط نوجدازى 21:30 En 432 Ent 2/18-30 20 27 8 2/3/2/2 2/15:30 27 3 ASi U602 Comport
302-324-353/47ATA //3A0

in signification of my 1/3/20 (1/2) نام وسكونت اطلاع د بهنده مستخيث ٣- مخفركيفيت جرم (مددند) مال المركبيل كيايد-جائے وتوعدفا صلیتھانہ ہے اور سمت ٢- كاروالى جوننيش ك متعلق كافي الراطلاع درج كرف يم وقف وا مواد وجديان كرو مسرم مسرم مسرم مسرم معام كالي ك تمانے روا کی کاریخ دونت MHC-P3-Bushon (16,5)

ORDER:-

Constable Muhammad Usman No.282 was absented him self form 09.10.2008 to date with out proper permission of his superior.

He was served with Charge Sheet and Statement of allegation. Mr: Finz Hussain DSP Alpuri and Bahrudin Khan ASDPO Puran were appointed as Enquiry officers to conduct proper Departmental Inquiry against the defaulter Constable. The inquiry officers in their Finding Report recommended the defaulter Constable for discharged from service and period of absence is counted as leave without pay.

A Final Show Cause Notice was issued to the defaulter or 15.11.2008. But no reply of Final Show Case Notice was received in stipulated period i.e 15 days. SHO concerned report received that as per his Brother and father stated he has left for abroad and is no more willing to continue his service in Polic Department.

Therefore, I Muhammad Iqbal Khan Marwat, Distric Police Officer Shangla, as a competent authority exercising th Power vested in me under N.W.F.P Removal from service Special Power Ordinance 2000, awarded to him a Major punishment it dismissed from service with effect form the date of his absence i.e 09.10.2008.

Order announced.

OB No. 6/ Dated. 0h /01 /2008.

District Processicer Shangla.

Afford

Scanned with CamScanner

12. 12. dl oil 12. 2000 الماريكية عوال مرتب نبر 30 سريد 3006.05.05 تا المان اداروں کے لئے انتہائی خطرہ ک دور تھا۔ ند يسرما كيدايد حالات من اپني ويوني كوايماندارى اورويانتدارى كرساتها انجام دية دوي وبشت كروول اور تسكر يب فيندول ير سخت محراني علاددان محفلاف انسران بالاكوروت يقنى اطلاعات بذر بيرسبرس ريور فراتم كرتار بتاقتا-يركموراد 22.08.2008 كرقر اقرم إك وي يرجمقام لواخ في وند في من نسب شده بارودي مواداً ري جوانون يربالاست كيا ميا بحس منظارين بسرسا كياسة بردنت اهادياً ربيرك السران بالاكوارسال كركي جس يرمقد مدعلت 125 مودند 2008 22.08 جرم 2013.32 PPC . 6/7 . آجام الله بنام يرخون ف مزم الزيان معوم درق وسنركي في را عن ماريورك إلى FIR المراولف يد سے کہ تقدر منوان بازی می نزم امزر ن ناسعه مرکی معلوفات اور بادی مرادی کو سنتے ہورا کیلے نے موری 2009 02 28 بامل بيذر بيية ورس رماني سامسل تر يحيونسه ان بالأكور ميورت بيش كي (سورش ويوريت امراه لف سهر)-یک بیم ما تیا کے مورک رورت براز ان کی تا مزدگی کے بعد بسرما کیا کونا الدخود میں لمز بان کی طرف مختلف تم کی جمکیاں : بناشرون وركى يكن بهرما تيليف وصلامندى مع ماتهواين قرائض معتى مرانيام دسية دوسة سارسة حالات واتعات سانسران والأوآع والمراس ید کم میک فریب خاندان سے تعلق دکتے ہیں اور بھرسا کیا۔ سابق کنسیل محریثین جارے ابادیان اور کنے کا احد سبارا کا ات ہونے کے ماسلے من ما کیلداورخاوہ ام نے دمنتہ وول کی ڈھیول کی دب پر بھی وقت سے کئے ملک بدو کرنے پر بھی وکیاں کا کساس کی زندگی منوظ یک چرسا کیائے ہمادے اسراداور تحراراورای وقت کے بیشتروی کے گرم ناحول کی وجہم والمدین سابقہ کنسٹیل اس کے کس تبی بات پر ئانە : و سىكھاس كىنئە بىرما ئىلەكۇ بەلىرىمجورى معودى عرب باتايزارجىن كى دېيەت دەمىككە يولىس سەمورىيە 09.10.2008 سىنى غير حاضر بیک بیج نیم حاظ بی بسرس کیا۔ نے فاہ ف محکماندا تکوائری شروع ہو کہ بعد اتحوالری بحوالد ارور بک نبسر 01 سود ند 2009،01،2000 مخار ع برفاست من ميا القل ارة ماهم اولف مدر س کے بیان باسر بھی تاش قرب کے بسرما تیلہ سے دوس ر بعدت برن مزوطن خورشد والد سکا سکت دعول برجیا بدول کے دودان مقای المورية المرادية المن المن على المرادي المن المرادية المرادية المرادية المرادية المرادية المرادية المرادية الم يدكه بسرسا ئيلما نتالي مجود رئ كي هجه التي المراج العالم والم المراه الميد المتدوات كه بسرسا كيله ك غربت الأقر بالغوار كويش ا الله المراح كله الله الله الله على المرف كا كانت صادر فم الدين أما تيا معدا في وعيال فأوقت وست بدوعار فتك م for necessary مَدِيْنَ نُبِر 9030944 و0341

سان فره ترك محرفان كسام ريان المراموري بان كال وهمان سال 2009 مرسانوليا) بيد من الرس 800 مرك المراوران على كادر الموس كل عنوفاً مؤرث روم الله المرادر اور الحس (مرازار وسان در از المساق الفاق الفارك المراق المان و الرواد المرادات رمادم - رسي وران عمان مراوع لي كور عمراه مرف طلات عدل الماء كما م معطال ما طنع دهال لى المراجع ورفيها بركرون روفة أفسرون مالا كالركس مى زمان طرم الكوي في موريد زظ در معت عالي فروس الما دون مراما و الوراء تي والعداد أور من الرافية مراز مع عمان مرسافه الما منتر بركان الإن الم The solution of distribution is a silverior مر فی کرمن و داری ، به مراسان سے دو کی رز ت ۔ . She fired burg

الراج ال

ان<u>ترانس زی زاده بر</u>

وتعربت يحاليه ونواست إزال ذيب في في والعديد ما يتستعمل عمد الهان

۽ تاب ۽ نا

المحال مشمول ورفواء ہے زمال الدينة في في وحدو ماریف المحال الدين أنه 1280 ماریف المحال میں اللہ 1280 ماریف الم 2955ء ورائد 202-7-9رفتر دین ہے شامی ہائیس مریداو سا میں تشاخ شرایش میں خدا سے جس سامین میں سات المحال میں تشام منتذ مروث نسبت المعام شد والمحوالزی ورکزا بی تحالی راجا ہے کا جسال سے بیان ہے تھا تھ سے الک ما

ور وين المشل بيم المناهدين المستعدد

المد ميذ منتخل فربادى قررتها د بلام

عن معرف ناميته معمل بيت فيه 282

المراس محمرة مم الدميران شنه نديث وتماني

منده به بالاستعتان سناسینا اسینا بیانات به منده مندگی با رو آنی استان استان استان با استان استان استان استان استان به استان ا

Affelted

روران الكوارئ تمتيتات ميانات وريم ركاندات سے إلى كياك --سكنت على فدكور وبالمرجيوري فيرماضر والروست أروى كيبيات بابرمكك مووى مرب جاذكا تماء

د كوريدا بيد ل لوكادر خواست مقيقت باين ب-

لا مرسمت میکورنی برای می آندینات تنااه دوبشت گروون کی مت نست پرتنا۔

مغار<u>ثات:۔</u>

مندرجه بالاحتائق مے چین نظر ندکور وسابقه معنی محمد میمان نمبر 282 کواکر محکمہ بولیس میں برال کیا جائے تو ببتر بوگا ، و تیرانسران بالاصاحبان کالمنم افضل ہے ۔ انگوائر ق د اچرت مرتب بوکر تنز ارش ہے۔

نوت _ (کل 8/ قطعات اف شموا بیل)

ني <u>2020 الغار وولد 06</u> أكت 2020.

atteled

H-16

بحضور جناب ريجنل پوليس سربراه صاحب ملاكنة تريزن بمقام سيدو شريف سوات در خواست بعراد تحالی ملازمت

خناب عالى!

درخواست ذیل فرص ب

يركه سائل تخصيل بشام، بر كلي دند كي شائل شازگار كانسا

۔ به که سائیل سال 2004 میں تحسیرے کنسٹیل نکلہ اولیس میں کجر تی اوا۔

يەكەبدوران مازمت مائىل نے مختلف مقامات برايماندارى اورخۇش اسلولى كى بى فرائىنى مىمىيى سرانجام دىكىت-

یک بدوران ما زمت سائل کو بحوالد او دُر کے مجر 39 مور ند 02.05.2008 تفانہ بٹام سے ڈسٹر کرائٹ میروئی برائ کیکٹر B آمینات کیا

بدكرسال 2008 من ملك مجرفضوصاً لماكنز دويون كر مالات إدجه طالبانا تزيش مركاري المكاران بالخديس قانون تافذ كرف وال

اداروں کے لئے انتہا کی خطر یاک دور تھا۔

سائل اليد مالات من ائي ديوني كوايا مداري اورويا نتداري كرماتيدا نجام دية وقد ومشت گردون او مسكريت پيندون مرجمت

محراني ك علاو دان ك خلاف اضران بالأكوبروت أنتي اطلاعات بذراجة مودل رادر فرا أم كرتار مهتا تحا

يرك مود تد 22.08.2008 كوتر اقرم إئد و بربر عام إدائز كى دعد كي غين نسب شده باردوى مواداً رى جوانوں پر باست كيا ميا وجس سليل مين سائيل نے بروقت اطابا أو بورك السران بالا كو ارسال كر كے جس برہ غدامہ خات 125 مورند 22.08.2008 جرم 302,324

PPC . 6/7 ATA تحال بناف لزم الزيان المعلوم درج وجرك أن (اطاباً وبرث أقل FIR مراه لف ٢٠)

بیر که مقدر مثنوان بالا میرم الزمان ، معلوم کی معلومات از رپیته براری کریتے ، وینے سائیل مورجہ 28.02.2008 پرامل ملزمان تک نر ربیمیوری رمانی واسل کر کے اضران بالا کور پوت فیش کی (سوری راورث امراوان سے)۔

پر کہ تن سائنس کے سوری ربورٹ پہلز ان کی نامزوگی کے ابد سائنل کو عالیہ خود ٹیں بلز مان کی طرف مختلف تنم کی وحمکیاں: میامرورع جرکی كين ما تيل في حوصا ومندق كرماتها في فرائش منعبي سرانجام دية وع سادي حالات واقعات بالسران الاكوآ كاد كريار إ

یے کہ مانکل ایک فریب خابدان سے آمال رکھا ہے، اپنے ضعیف والدین اور کئے کا واحد سیارا کفالت وونے کے ناسطے والدین سف والمنظروول كي وممكول كي وجه ويت عرف الناسط المركز في مجودكيا

پیکے مائنل نے اپنے والدین طمئن کرنے کی بہت کوشش کی الیان اس وقت کے دہشتگر دی کے گرم ماحول کی وجہ ما ٹیل کے والدین مشکن ا ت و سناس لئے ماکن کو بامر جوری مورث اور بالالال جی کی دیدے ماکن مجکہ پولیس مے مورید 09,10,2008 سے غیر ماخر ہوا

یے کہ پیچہ فیر حاضری ما کیل کے قال تھان اللوائری شروع ہوکر ابعد الکوائری کوالے اداؤر کی فمبر 01 موجد 02.01.2009 کار

میلیں سے برناست کیا گھیا آئل اوڈ رہمرا الف ہے۔

یہ کے بیمان بیام بھی تابل و کرے کا من ما کیل کے موران اورٹ برنام دہلام خوشد ولد ملے سکندوند کی بر جیاب زنی کے دوران مقانی پیس لیاک اری ازم نے فائز کر کے جس کے نتیج میں ، تان تیار بشام کے SHO اس اور کانسلیل اور رضی نم BUSPO ، وقع پاشید

موع جبك بدوران بيلس ارى قاليلوم عن إلى زالش FIR تمراه ك ب

٣١٠ ﴿ مِكْمِمَا كُلُّ الْمِمَانُ مِجْوِدِي كَا جِيهِ عِنْ اللَّهِ مِنْ إِنْ إِنَّا غَيْرِ حَاصَرَةِ وَاسْتِهِ السَّدِيَّا فِي كَمَا كُلُّ كُرْبِيتَ اورْقَرَ الْعُولَ وَبِيْنَ أَخْرِ ر کے کرما تکل کو دوبارہ محکمہ بیلیس میں ہمال کرنے کا منامات صادر فرمادیں آدسا تنگی تا حیات دعا کرر دیگا۔

رابعه بيدانه المحارة أكان والمواجعة 0341-9030944 - Eti-16/08/2020

Affelled

"B"

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

	PESHAVVAR. y./
•	No.
•	Appeal No
•	Appellant/Petitioner
)	Versus
Me	Respondent
:	Respondent No
	Notice to: - the Region at Saidu Sharif Swat.
	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 ton
	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.
٠.	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. No tice
	Copy of appeal is attached. Copy of appeal has already been sent to you vide this
	office Notice Nodateddated
	Given under my hand and the sea! of this Court, at Peshawar this
	Day of
/	
	for (Zophy)
	Registrar

Note:

Khyber Pakhtunkhwa Service Tribunal, Peshawar.

The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.

Always quote Case No. While making any correspondence.

"B"

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

•		•		•
No.	, (7
Ap	peal No	909	of 20 20	
Mu	peal No	man	.Appellant/Petitioner	•
	T Ve	rs ūs	1 2	
1 the-	J-G-D Wes	(YK	Respondent	•
ind		Respondent No:	_	• •
<u> </u>	~ (1 A A		•
Notice to:	· Distrif	loxice Of	May 13	H12++:
	/	hanasa.	•	
WHEREAS an Province Service Tri the above case by the hereby informed tha *on	appeal/petition under bunal Act, 1974, has be petitioner in this Court the said appeal/petition at 8.00 A. you are at liberty to do troned either in person at documents upon which arance on the date fire heard and decided in	the provision of the presented/region is fixed for home to be a so on the date fixed for by authorised the provision of the p	the Khyber Pak istered for consider ordered to issue aring before the urge anything and any other day ed, or any other day ed representative therefore, require copies of written ise also take noti	chtunkhwa eration, in ue. You are e Tribunal against the ay to which or by any ed to file in statement ice that in
given to you by regist address. If you fail to address given in the amotice posted to this athis appeal/petition.	alteration in the date fi stered post. You should furnish such address y appeal/petition will be d address by registered po	I inform the Regiour address contaileemed to be your ost will be deemed	strar of any chan ined in this notice correct address, a sufficient for the	e which the and further purpose of
	•	·	•	
		•		2 1h
Given under n	ny hand and the seal of	f this Court, at Pe	shawar this	1
Day of	1	-ug 20 7	L1	
for Keply		· · · · · · · · · · · · · · · · · · ·		•
1 , , , ,	1		Registrar	
,		> Khyber Pakht	unkhwa 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.

بعدالت جناب عدس مرسول Kpx عنام لينا وربرا وكيمب كورث سوات

مورده کا جوان محدود مناب ایران مناب مورده کا جوان مناب ایران مناب مقدمه مقدمه

باعث تحريرا نكه

مقد مہ مند رجہ عنو ان بالا میں ایپے طرف سے واسطے پیروی وجو ابرد ہی وکل کاروائی متعلقة أن مقام كريب ورائسوا م كور تخدجا ويدجا ن البروك في ميريم كورال ان السكان ور مقرر کرکے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کا روائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ وتقرر ثالث وفيصله برحلف دينج جواب دهيا وراقبال دعوى اور درخواست هرقتم كى تصديق زراوراس پردسخط كرنے كا اختيار ہوگا۔ نیز بصورتعدم پیروی یا ڈگری ایک طرف اپیل کی براماگی اورمنسوخ مذکور کے ممل یا جزویکاروائی کے واسطے اور وکیل یا مخارقانونی کواپنی همراه یا اپنی بجائے تقرر کا اختیار ہوگا۔اورصاحب مقررشدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور ا سکا ساختہ برواختہ منظور وقبول ہوگا۔اور دوران مقدمہ میں جوخرچہ وہرجانہ التوائے مقدمہ کے سبب سے ہوگا اسکے ستحق و کیل صاحب ہوئے۔ نیز بقایا وخرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہویا حدسے باہر ہوتو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ ندکورلہذاوکالت نامہ لکھ دیا کہ سند رہے اه والغي

العبر العبرالات العبر ال

M. Javid Kram on 1 - 1 am 1 2 et 1 pier.
A. S. C
03439607472

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

		OF	2020
Mul	annual u	smen	(APPELLANT) (PLAINTIFF) (PETITIONER)
	VERSU	IS	
. :	VLING		
Pol		\ -	(RESPONDENT) _(DEFENDANT)
•	•		
I/We	Juhammad	urman	·
YOUSAFZAI, Advocompromise, withdraw/our Counsel/Adwithout any liability engage/appoint any I/we authorize the receive on my/our deposited on my/our	cate, Pesh aw or refer dvocate in for his defar other Advoca said Advoca behalf all su	awar to ap to arbitrati the above ult and with ate Counse te to depos ms and am	pear, plead, act, on for me/us as noted matter, the authority to l on my/our cost. sit, withdraw and ounts payable or
Dated/	/2020		
	•	CLIEN'	T(S)
		SHAHZULL KAME	CEPTED AH YOUSAFZAI &
		AD\	OCATES