

05.07.2022

Junaid Liaqat Advocate, junior of learned counsel for appellant present.

Noor Zaman Khattak, learned District Attorney for respondents present.

Former made a request for adjournment as senior counsel is busy before Peshawar High Court Mingora Bench (Darul Qaza) Swat; granted by way of last chance. To come up for arguments on 02.08.2022 before D.B at Camp Court, Swat.



(Fareeha Paul)
Member (E)
Camp Court, Swat



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

2-8-22

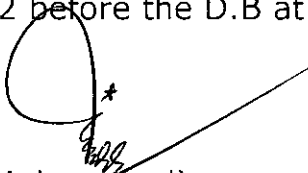
Due to reasons mentioned in case is adjourned to 7-9-22 for the same.



07.09.2022

Learned counsel for the appellant present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments on 06.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)
Member (Executive)
Camp Court Swat



(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

09.03.2022

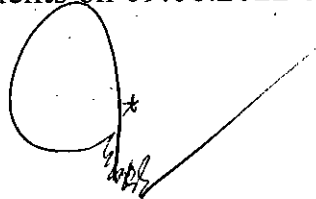
Due to retirement of the Hon'ble Chairman, the case is adjourned to 11.05.2022 for the same as before.


Reader

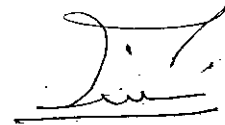
11.05.2022

Nemo for the appellant. Mr. Noor Zaman Khattak, District Attorney for respondents present.

Previous date was changed on Reader note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments on 09.06.2022 before D.B at camp court Swat.



(Mian Muhammad)
Member(E)

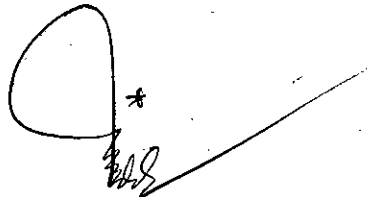


(Salah Ud Din)
Member(J)
Camp Court Swat

9th June, 2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Sultanat Khan, DSP for respondents present.

Counsel are on strike. To come up for arguments on 05.07.2022 before the D.B at camp court Swat.



(Mian Muhammad)
Member(E)

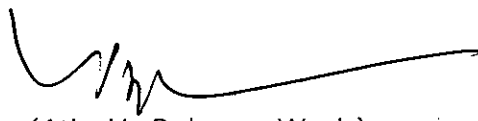


(Kalim Arshad Khan)
Chairman
Camp Court Swat

03.11.2021

Junior of learned counsel for the appellant present. Mr. Hikmat Khan, H.C alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the court at Bahrain. Adjourned. To come up for arguments before the D.B on 06.01.2022 at Camp Court Swat.



(Atiq-Ur-Rehman Wazir)
Member (Executive)
Camp Court, Swat

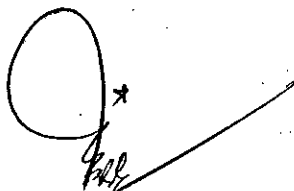


(Salah-Ud-Din)
Member (Judicial)
Camp Court, Swat

06.01.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that his counsel is not available today due to general strike of the Bar. Adjourned. To come up for arguments on 09.03.2022 before D.B at camp court Swat.



(Mian Muhammad)
Member(E)



(Salah Ud Din)
Member(J)
Camp Court Swat

06/04/2021

Due to COVID-19, the case is adjourned to

08/06/2021 for the same.



READER

26.07.2021

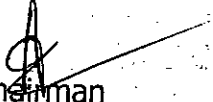
To come up for written reply/comments of respondent No. 7 on 25.08.2021 before S.B at Camp Court, Swat. Notices be issued to appellant/counsel as well as respondents for the date fixed.



Chairman

25.08.2021

Junior to counsel for the appellant, Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Khawas Khan, S.I Legal for official respondents and private respondents No. 4 to 6 in person present. They have already furnished reply/comments. Nemo present on behalf of respondent No. 7 despite proper service, hence proceeded against exparte. The appeal is entrusted to D.B for arguments on 03.11.2021 at camp court Swat.



Chairman
Camp Court Swat.

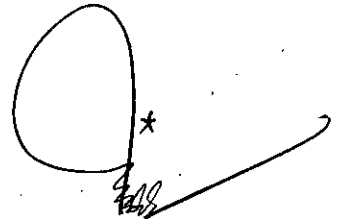
01.02.2021

Nemo for the parties.

Muhammad Riaz Khan Paindakhel, Assistant Advocate General for respondents is present.

As the case was adjourned previously on the Reader note, therefore, notices be issued to the parties.

Adjourned to 01.03.2021 before S.B at camp court Swat.



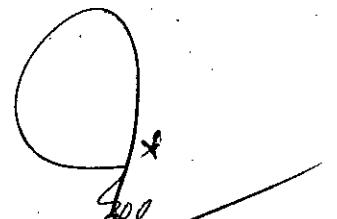
(Mian Muhammad)
Member(E)
Camp Court Swat

01.03.2021

Counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Khawas Khan, SI for official respondents No. 1 to 3 and Private respondent No. 7 in person present.

None for private respondents No. 4,5, and 6 despite issuance of proper notice, hence, proceeded against ex-parte.

Written reply on behalf of official respondents have already been submitted. Private respondent No.7 seeks time to submit written reply on the next date. To come up for written reply of respondent No.7 on 06.04.2021 before S.B at camp court Swat.



(Mian Muhammad)
Member(E)
Camp Court Swat

07.10.2020

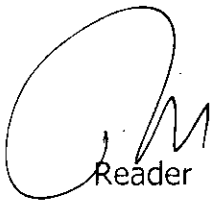
Neither appellant nor his counsel is present. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Khawas Khan, Inspector (Legal) on behalf of official respondents and private respondents No. 4 to 7 are also present.

Written reply on behalf of official respondents No. 1 to 3 has already been submitted while private respondents No. 4 to 7 are seeking further time to furnish written reply/comments. Time is given. File to come up for written reply/comments on behalf of private respondents No. 4 to 7 on 07.12.2020 before S.B at Camp Court, Swat. Notice be also issued to appellant as well as his respective counsel for the date fixed.


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT SWAT

07.12.2020

Due to COVID-19, case is adjourned to 01.02.2021 for the same as before.


Reader

03.06.2020 Due to Covid-19, the case is adjourned. To come up for the same on 08.07.2020, at camp court Swat.



Reader

08.07.2020 Bench is incomplete. Therefore, the case is adjourned. To come up for the same on 08.09.2020, at camp court Swat.




Reader

08.09.2020 Counsel for the appellant present.

Mr. Riaz Painsdakhel learned Assistant Advocate General alongwith Mr. Khawas Khan SI for official respondent No. 1 to 3 present. None present on behalf of private respondent No. 4 to 7 present.

Written reply/comments on behalf of official respondent No. 1 to 3 submitted. Written reply/comments on behalf of private respondent No.4 to 7 not submitted. Notice be issued to private respondent No.4 to 7 for written reply/comments. To come up for written reply/comments on behalf of private respondent No. 4 to 7 on 07.10.2020 before S.B at Camp Court, Swat.



Member
Camp Court, Swat

05.03.2020

Appellant with present. Preliminary arguments heard.

The appellant has filed the present service appeal against the order dated 08.02.2019 whereby the appellant was awarded punishment of reversion to a lower rank of Constable, against the order dated 16.05.2019 through which departmental appeal of the appellant for restoration of his rank as Head Constable was filed and against the order dated 17.09.2019 through which application/revision petition of the appellant was filed.

Submissions made by the learned counsel for the appellant, need consideration. The present service appeal is admitted for regular hearing subject to all just 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. To come up for written reply/comments on 08.04.2020 before S.B at Camp Court, Swat.

Appellant Deposited
Security & Process Fee

10/3/20

Member
Camp Court, Swat.

Due to corona virus tour
to camp court swat has been
cancelled. To come up for the
same on 03-06-20

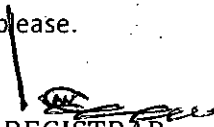

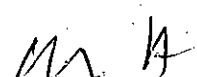
Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1508/2019 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	08/11/2019	<p>The appeal of Mr. Jamil-ur-Rehman presented today by Mr. Shabir Ahmad Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 2/11/19</p> <p>2-</p>	09.01.2020	<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>09-01-2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to general strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Adjourned to 05.03.2019 for preliminary hearing before S.B at Camp Court Swat.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court Swat</p>

BEFORE KHYBER PAKHTUNKHWAH SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1508 of 2019

Constable Jamil Ur Rehman

Vs

Provincial Police Officer Khyber Pakhtunkhwa at CPO Peshawar and
others

SERVICE APPEAL

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6.	Copy of charge sheet along with statement of appellant and demo pictures	"C", "D"	16-21
7.	Copy of impugned order dated 13/02/2019 along with better copy	"E"	22-23
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Shabir Ahmad Khan
Appellant
Jamil Ur Rehman
Through Counsel
Shabir Ahmad Khan
Advocate, High Court
Office Address: Hamza Law Chamber,
Dubai Plaza,
Near Azad Medicine Company
Dakkhana Road, Mingora, Swat
Cell No. 0341-5666363

①

BEFORE KHYBER PAKHTUNKHWAH SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 1508 of 2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1595

Dated 08/11/2019

Constable Jamil Ur Rehman Belt No. 350 posted at Police
Line Swat

...Appellant

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa at CPO
Peshawar
2. Regional Police Officer Malakand R-III at Saidu Sharif,
District Swat
3. District Police Officer Swat
4. SHO Halim Khan P.S Madyan
5. Constable Sadullah Jan 3535/SPF posted at P.S Madyan
6. Constable Hayat Ali 303/R Posted at P.S Madyan
7. Mubarak Ali alias Kakoo S/o Muhamad Rahman R/o
Gharai Kalay, Madyan, District Swat

.....Respondents

Filed to-day

Registrar

8/11/19

SERVICE APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT,
1974 AGAINST THE IMPUGNED ORDER OF RESPONDENT NO.
3 DATED 13/02/2019 TO THE EXTENT OF REVERSION,
WHEREBY THE APPELLANT WAS REVERTED TO A LOWER
RANK FROM THE RANK OF HEAD CONSTABLE TO
CONSTABLE. THE APPELLANT PREFERRED DEPARTMENTAL
APPEAL TO RESPONDENT NO. 2 BUT THE SAME WAS FILED
ON 16/05/2019 THEN THE APPELLANT FILED REVISION

PETITION BEFORE RESPONDENT NO.1 BUT THE SAME WAS FILED BY RESPONDENT NO.1 ON 24/09/2019 AND COMMUNICATED TO THE APPELLANT ON 09/10/2019.

PRAAYER:

BY ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED ORDER OF RESPONDENTS MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE RESTORED BACK TO THE POSITION OF HEAD CONSTABLE FROM THE DATE OF REVERSION.

Respectfully Sheweth:

Facts arising to the present appeal are as under;

- 1) That appellant was initially recruited in police Department as Police Constable and later promoted to the rank of Head Constable.
- 2) That from the day of appointment the appellant performed his duty with honesty, zeal and enthusiasm yet.
- 3) That the respondent No. 4 SHO Muhammad Halim Khan on 13/12/2018 arrested accused namely Mubarak Ali and Faiz Ur Rahman and lodged an FIR against them vide No. 690 dated 13/12/2019 U/S 9B-CNSA /9C-CNSA and 15AA in

P.S Madyan. (Copy of FIR along with better Copy of FIR is attached herewith as annexure "A")

(3)

- 4) That on the same day one accused namely Mubara alias Kakoo fled away / escaped from lockup, when appellant came to know, the appellant immediately brought it into the notice of SHO / respondent No. 4. It is pertinent to mention here that the said accused was arrested at the same day again, but the respondent No.4 lodged an FIR against the appellant and respondent Nos. 5 to 7 vide FIR No. 691 dated 13/12/2018 u/s 223/224-PPC at P.S Madyan. It is pertinent to mention here that the mentioned case is pending before the learned Magistrate Bahrain, District Swat. (Copy of FIR along with better copy of FIR is attached herewith as annexure "B")
- 5) That the respondent No.3 issued charge sheet vide No. 97/PA to the appellant and SP upper Swat was enquired as enquiry officer. The appellant submitted detailed reply to the charge sheet issued by respondent No. 3 along with demo pictures. (Copy of charge sheet along with statement of appellant and demo pictures are attached herewith as annexure "C & D" respectively)

- 6) That the enquiry officer conducted enquiry and submitted his finding reports to the respondent No. 3 and on the bases of that report, the respondent No.3 without being fairly heard, illegally and straight away awarded punishment of reversion from rank of head constable to constable. (Copy of impugned order dated 13/02/2019 is attached herewith as annexure "E")

- 7) That aggrieved from the impugned order, the appellant preferred the departmental appeal to the respondent No.2 but the same was filed by respondent No.2 without summoning and heard appellant and ran one-way traffic. (Copy of departmental appeal and order are attached herewith as annexure "F & G" respectively.)

- 8) That then the appellant filed revision petition before respondent No. 1 but in vain as the same was also filed by respondent No.1. (Copy of revision petition and order is attached herewith as annexure "H & I" respectively).

- 9) That no proper opportunity of being fairly heard was given to the appellant and respondent No.3 illegally reverted the appellant to a lower rank which is against law, rules and norms of justice.

- (S)
- 10) That aggrieved from the orders of respondents No. 1 to 3, the present appeal is submitted on the following amongst other grounds.

GROUNDS:-

- i. That the appellant rightfully lock up the accused in the lockup and strict instructions were given to santri / respondent No. 5 for supervision, which, then became the core and prime responsibility of respondent No. 4 to supervise the accused in the lockup.
- ii. That there was no operational washroom inside the lockup and one of the accused needed to use washroom, hence, he was handcuffed and carried to the operational washroom inside the building supervised by Santri / respondent No. 5.
- iii. That on return, the respondent No. 5 informed the appellant in the Moharrar Office / Roznamcha that respondent No. 5 is missing from the lockup, the lockup was properly locked and accused Mubarak Ali / respondent No. 5 fled away / escaped. The appellant

(B)

along with other person searched the whole building but the said accused could not be found anywhere.

- iv. That the appellant brought the said incident timely into the notice of the respondent No.4, and, the respondent No.5 lodged an FIR against the appellant and respondent Nos. 5 to 7 by stating that the appellant had left lockup gate opened due to which the accused Mubarak Ali had fled away/ escaped. The same stance of the SHO/respondent No.4 is totally opposite to the statement of the accused Mubarak Ali, who, after arrest, stated himself that he had fled away by stretching the lockup and he also gave a practical demo of the same move of fleding away in the presence of respondent No. 4 but the same was bluntly ignored by respondent No.4.
- v. That the appellant has performed his duty by locking up the accused and instructing the respondent No. 5 for supervision and the statement of respondent No. 7 himself justifies the innocence of the appellant in this case.
- vi. That the appellant has been given punishment of reversion from Head Constable to Constable which is against law, rules and norms of justice.

- vii. That the appellant was not heard properly and no weightage was given to his stance in defence neither was it deemed necessary by the respondents which totally violates every corner of justice that prevails.

- viii. That the appellant was not treated in accordance with law and rules on the subject and the impugned order has been passed in flagrant violation of law and rules tainted with mala-fide intention and is therefore not sustainable and is liable to be set aside.

- ix. That the universal cannon of natural justice have been set aside and no ample opportunity of presenting the delinquent stance / version has been given.

- x. That the constitutional and fundamental requirements of "Equal protection and equality before law" have bluntly been violated.

- xi. That the impugned order is unreasonable, arbitrary and is liable to be set aside.


- xii. That other important points will be raised during the course of arguments with prior permission of this Honorable Tribunal.

Therefore, it is humbly prayed that by the acceptance of this service appeal, the impugned order of respondents No. 1 to 3 may kindly be set aside and the appellant may be restored back to the rank of Head Constable from the date of reversion.

Any other relief as deemed appropriate in the circumstances of the case and not specifically prayed for may also be granted to appellant.

Appellant 
Jamil Ur Rahman No. 350

Through Counsel


Shabir Ahmed Khan (Dawlat Khail)
Advocate, High Court

Dated: 05/11/2019

(9) (C)

**BEFORE KHYBER PAKHTUNKHWAH SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____ of 2019

Constable Jamil Ur Rehman

Vs

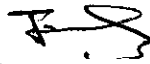
**Provincial Police Officer Khyber Pakhtunkhwa at CPO Peshawar and
others**

SERVICE APPEAL

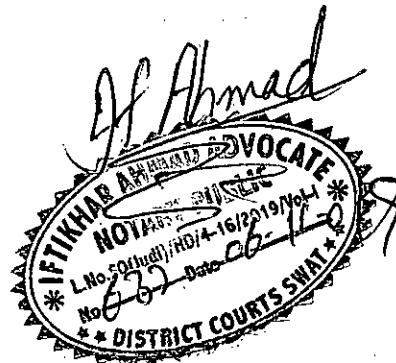
Affidavit

I Jamil Ur Rehman Belt No. 350 posted at Police Line Swat , do hereby states on oath that all the contents of this Service appeal are correct and true to the best of my belief and knowledge and nothing has been concealed from this Honorable Tribunal.

Deponent



Jamil Ur Rehman



(10)

(10)

**BEFORE KHYBER PAKHTUNKHWAH SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____ of 2019

Constable Jamil Ur Rehman

Vs

Provincial Police Officer Khyber Pakhtunkhwa at CPO Peshawar and
others

Memo of Addresses

Address of the Petitioner:

Constable Jamil Ur Rehman Belt No. 350 posted at Police Line Swat

CNIC No. 15602-7329372-9

Cell No. 0314-9710294

Addresses of the Respondents: -

1. Provincial Police Officer Khyber Pakhtunkhwa at CPO
Peshawar
2. Regional Police Officer Malakand R-III at Saidu Sharif,
District Swat
3. District Police Officer Swat
4. SHO Halim Khan P.S Madyan
5. Constable Sadullah Jan 3535/SPF posted at P.S Madyan
6. Constable Hayat Ali 303/R Posted at P.S Madyan
7. Mubarak Ali alias Kakoo S/o Muhamad Rahman R/o
Gharai Kalay, Madyan, District Swat

Appellant

Jamil Ur Rahman No. 350

Through Counsel

Shabir Ahmed Khan (Dawlat Khail)

Advocate, High Court

ابتدائی اطلاع رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زبردفعہ ۱۵۴ مجموعہ ضابطہ فوجداری

ضلع: سوات

تھانہ: مدین

تاریخ: وقت وقوع 13/12/2018 بوقت 15:15 بجے

F.I.R نمبر: 690

1	تاریخ و وقت رپورٹ	13/12/2018 بوقت 16:00 بجے، چاکیدگی پرچہ 13/12/2018 بوقت 16:30 بجے
2	نام و سکونت اطلاع دہندہ مستغیث	محمد حلیم خان SHO سکنتھانہ مدین موبائل نمبر 0342-9228540
	مختصر کیفیت جرم (معدہ دفعہ) حال اگر کچھ لیا گیا ہو۔	مختصر کیفیت جرم (معدہ دفعہ) حال اگر کچھ لیا گیا ہو۔ 9C-CNSA-9BCNSA/15AA (چس 1020 گرام ہیروئن 140 گرام پستول 30 بوریہ 11 عدد کارتوس
4	جائے وقوع فاصلہ تھانہ سے اور سمت	خانہ ملزمان واقع گھڑی کلے مدین بفاصلہ 1/2 کلومیٹر جانب شمال از تھانہ
5	نام و سکونت ملزم	مبارک علی عرف کا کو ولد محمد رحمن عرف کا کا سکنتھانہ گھڑی کلے مدین شناختی کارڈ نمبر: 3-15602-8843395 موبائل نمبر 0315-9326645 فیض الرحمان عرف قصورے ولد محمد رحمن عرف کا کا سکنتھانہ گھڑی کلے، مدین، ضلع سوات شناختی کارڈ نمبر: 7-15602-0511380 موبائل نمبر: 0346-6645871
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	بدرسیدگی مراسلہ فقرہ مذکور قائم کیا گیا۔
	تھانہ سے روانگی کی تاریخ و وقت	بہ سبیل ڈاگ

ابتدائی اطلاع نیچے درج کرو۔ اس وقت ایک تحریری مراسلہ

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

محمد حلیم خان SHO بدست ہیڈ کانسٹیبل محمد ریاض IHC موصول ہو کر متن ذیل ہے۔ بخدمت افسر
انچارج تھانہ مدین بذریعہ مخبر اطلاع ملی کہ مبارک علی عرف کا کو بالا اپنے مکان میں اپنے بھائی فیض الرحمن بالا
کے ذریعے منشیات کے خرید و فروخت کا کاروبار کر رہا ہے۔ عدالت مجاز سے سرچ وارنٹ حاصل کر کے میں ہمراہ
محمد خالق ASI محمد ریاض IHC کنسٹیبل الماس بیگم 3157 دیگر نفری پولیس کے ملزمان بالا کے گھر پر بہ
امید برآمدگی منشیات چھاپہ زنی کر کے خانہ تلاشی عمل میں لائی جا کر دوران خانہ تلاشی کمرہ ملزم مبارک علی کے
عسلی خانہ سے نسواری کلر کپڑے کا تھیلا برآمد ہو کر چیک کر کے تھیلا سے سفید پلاسٹک کے تھیلا میں چرس بہ شکل
تختہ برآمد ہو کر وزن کرنے پر 1020 گرام نکل کر اسی ہی تھیلا سے منشیات فروشی کا رقم مبلغ 11470/- روپے

True Copy

مختلف نوٹس بھی برآمد ہو کر مجملہ چرس میں سے 05 گرام چرس بغرض تجزیہ FSL بند بہ پارسل نمبر 1 جبکہ بقایا 1015 گرام چرس بغرض ادخال مالخانہ بند بہ پارسل نمبر 2 منشیات فروشی کا رقم 11470 بند بہ پارسل نمبر 3 اسی طرح مبارک علی کے چار پائی کے سرہانے کے نیچے سے ایک ضرب پستول 30 بور نمبری 310516461 ساخت نامعلوم بمعدہ 11 عدد کارتوس ایک عدد سپر چارج بھی برآمد ہو کر پستول کے بارے میں کسی قسم کا لائسنس پیش نہ کر سکا اور موقع پر موجود ملزم مبارک علی نے چرس نقد رقم، پستول اپنا ملکیت ظاہر کی جبکہ ملزم فیض الرحمن عرف فیصو رے کا جامہ تلاشی عمل میں لائی جا کر قمیض کے نچلی جیب سے سفید پلاسٹک تھیلا میں ہیروئن برآمد ہو کر وزن کرنے پر 140 گرام نکل کر مجملہ ہیروئن میں سے ایک گرام ہیروئن بغرض تجزیہ FSL بند بہ پارسل نمبر 4 جبکہ بقایا 139 گرام ہیروئن بغرض ادخال مالخانہ بند بہ پارسل نمبر 5 اور پستول بمعدہ کارتوس بند بہ پارسل نمبر 6 کر کے جملہ چرس، نقد رقم، پستول بمعدہ کارتوس اور ہیروئن بروئے فرد قبضہ پولیس میں کر کے ہر دونوں ملزمان بالا کو مرتکبان جرم بالا پا کر موقع پر حسب ضابطہ گرفتار کر کے برخلاف ملزمان مراسلہ بہ جرم بالا ضبط تحریر میں لا کر بدست ہیڈ کانسٹیبل محمد ریاض IHC ارسال تھانہ ہے۔ انوسٹی گیشن سٹاف کو مامور تفتیش کیا جاتا ہے۔ مراسلہ گزارش ہے۔ Sd۔ محمد حلیم خان SHO تھانہ مدین، مورخہ 13/12/2018 کارروائی تھانہ پس آمدہ مراسلہ حرف بہ حرف درج صدر ہو کر نقل پرچہ بمعدہ اصل مراسلہ بمراد تفتیش شعبہ انوسٹی گیشن سٹاف حوالہ کیا جاتا ہے پرچہ گزارش ہے۔

دستخط انگریزی

(جمیل الرحمن) MHC-PS-Madyan

13/12/2018

Attested to be True Copy
Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

ابتدائی اطلاعی رپورٹ

فی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زبردستی ۱۵۴ مجموعہ ضابطہ فوجداری

ضلع سوات

مدین

تاریخ 13/12/18

عدالت 69

13/12/18	19105
نام محمد علی صاحب ولدیت 540	مکتبہ تحفظ مدین
موبائل نمبر 0342 9728540	
Pcc 223-224	ل اگر کچھ لیا گیا ہو۔
جوڈیٹل تحفظ مدین	م
1 نام مبارک علی عرف کاکڑ ولدیت محمد عثمان صاحب مکتبہ تحفظ مدین	بی بیات علی 303 تحفظ مدین R
2 نام جمیل الرحمن ولدیت قمر مکتبہ تحفظ مدین	
3 نام سعید اللہ ولدیت 3435/SPF مکتبہ تحفظ مدین	
فی اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	حسب اطلاع حفرہ حفرہ قائم ہوا۔
	بہ سبیل اطلاع

ابتدائی اطلاع نیچے درج کرو۔ درج ذیل خرابیوں گشت فوراً بازار میں جو درج کیا۔
 جوڈیٹل 18/56 بجے تحفظ مدین جسٹس کی رہائشی گھر میں داخلہ لایا گیا کہ وہیں تحفظ مدین آجائے
 ملزم مبارک علی عرف کاکڑ والا گہنڈا رشتہ دار مقدمہ عدالت 690، جوڈیٹل 13/12/18 جبر 9BCNSA
 ڈکیر بزرگ قریب بالا محلوں میں 15AA-9CCNSA تحفظ مدین جوڈیٹل تحفظ مدین سے فرار ہوا ہے۔ میں قریبی طور پر جوڈیٹل بالا ایفانہ
 فیض آباد میں عرف حضور سے وہی جنس برطان میں عرف کاکڑ والا 3435 نے جوڈیٹل تحفظ مدین کی دوسری ملزم
 مقدمہ عدالت 690 بالا میں بھی گرفتار کیا گیا۔ کاکڑ والا ساکن تحفظ مدین جوڈیٹل تحفظ مدین جوڈیٹل
 کہ جوڈیٹل تبدیل نہیں کیا ہے اور ملزم مبارک علی بالائے حلقہ حلقہ سے رجوع حلقہ کے حلقہ کے
 سے میں گرفتار کے راستے فرار ہو گیا ہے۔ وقوفہ ہذا سرکاری ملازمین میں محرم اور ستریاں
 کے معاملات لایا گیا ہے۔ حالانکہ میں نے بیانات خود ملزم مبارک علی بالائی کو حوالہ
 سے سزاؤں کے ساتھ بزرگوں کی تحفظ کی پابندی کیا تھا۔ پھر چاروں ملزمین ملزم کیسیان جرم
 بالائی کاپی کے برخلاف ملزمین بالائی مقدمہ جرم بالائی درج کر کے کیا جاتا ہے لیکن
 خاں ASHO کو ماہور نمیشن کیا جاتا ہے۔ اس ضمن میں بالائی کو اطلاع دیا جاتی ہے۔ پرچہ

Attested to be True Copy
 Shabir Ahmed Khan (Dawlat Khel)
 Advocate High Court
 & Federal Shariat Court

SHO-PS-umadiyam
 13-12-018

ابتدائی اطلاع رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۴ مجموعہ ضابطہ فوجداری

ضلع: سوات

تھانہ: مدین

تاریخ: وقت وقوعہ 13/12/2018 بوقت 18:45 بجے

F.I.R نمبر: 691

1	تاریخ و وقت رپورٹ	13/12/2018 بوقت 19:05 بجے
2	نام و سکونت اطلاع دہندہ مستغیث	محمد حلیم خان SHO تھانہ مدین موبائل نمبر 0342-9228540
	مختصر کیفیت جرم (معد دفعہ) حال اگر کچھ لیا گیا ہو۔	223/224-PPC
4	جائے وقوعہ فاصلہ تھانہ سے اور سمت	حوالات تھانہ مدین
5	نام و سکونت ملزم	مبارک علی عرف کا کو ولد محمد رحمن عرف کا کا سکنہ گھڑی کلے مدین جمیل الرحمن محرر تھانہ مدین سعد اللہ خان 3435/SPF تھانہ مدین
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	حسب اطلاع مقدمہ قائم ہوا
7	تھانہ سے روانگی کی تاریخ و وقت	بہ سبیل ڈاگ

ابتدائی اطلاع نیچے درج کرو۔ دوران موبائل گشت خوڑ بازار میں موجود تھا کہ

بوقت 18:56 بجے محرر تھانہ جمیل الرحمن نے بذریعہ موبائل فون اطلاع دی کہ آپ تھانہ آجائے ملزم مبارک علی عرف کا کو بالا گرفتار شدہ بمقدمہ علت نمبر 690 مورخہ 13/12/2018 بجرم 9B-CNSA, 9C-CNSA, 15AA تھانہ مدین حوالات تھانہ سے فرار ہوا ہے۔ میں فوری طور پر بوقت بالا تھانہ آکر بذریعہ محرر بالا معلوم ہوا کہ سنتری سعد اللہ جان 3435/SPF نے حوالات کھول کر دوسرا ملزم فیض الرحمن عرف فیضورے ولد محمد رحمن میاں عرف کا کان ساکن گھڑی کلے مدین جو مقدمہ علت نمبر 690 بالا میں بھی گرفتاری کو حوالات تھانہ سے رقعہ حاجت کے خاطر نکال کر حوالات بند نہیں کیا ہے اور ملزم مبارک بالانے موقع سے فائدہ اٹھا کر حوالات سے مین گیٹ کے راستے فرار ہو چکا ہے۔ وقوعہ ہذا سرکاری ملازمین محرر اور سنتریاں کے غفلت لا پرواہی کا نتیجہ ہے حالانکہ میں نے بذات خود ملزم مبارک علی بالا کو حوالات کے سلاخوں کے ساتھ بذریعہ چھکڑی باندھا تھا، پھر چاروں ملزمان مرتکبان جرم بالا کا پا کر برخلاف ملزمان بالا مقدمہ بہ جرم بالا درج رجسٹرڈ کیا جاتا ہے لیاقت خان ASHO کو مامور تفتیش کیا جاتا ہے۔ افسران بالا کو اطلاع دی جاتی ہے۔ پرچہ گزارش ہے۔

Attested to be True Copy

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

دستخط انگریزی

SHO-PS-Madyan (محمد حلیم خان)

13/12/2018

Amir C D 16

CHARGE SHEET

1. Syed Ashfaq Anwar, PSP District Police Officer, Swat being competent authority, hereby charge you, Head Constable Jamil Ur Rahman No. 350 while posted as MHC Police Station Madyan as follows:-

You committed the following act/acts, which is/are gross misconduct on your part as defined in Rules 2 (iii) of Police Disciplinary Rules 1975 with amendments 2014 vide Notification No.3859/Legal, dated 27-08-2014 of the General of Police, Khyber Pakhtunkhwa, Peshawar.

A case vide FIR No. 690, dated 13-12-2018 u/s 9C-CNSA/15AA was registered in Police Station Madyan against an accused namely Mubarak Ali who was put in the lockup of the Police Station. You were required to keep proper watch on the detained accused but you failed to fulfill your responsibility. As such the accused managed to escape from the lockup which caused an embarrassing situation for Police department. Your this act is against discipline and unbecoming of a Police Officer. You therefore, issued this charge sheet and statement of allegations.

2. By reasons of the above, you appear to be guilty of misconduct and rendered yourself liable to all or any of penalties specified in Rule-4 of the Disciplinary Rules 1975.

3. You are, therefore, required to submit your written reply within seven (07) days of the receipt of this Charge Sheet to the Enquiry officer.

4. Your written reply, if any, should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.

5. Intimate as to whether you desire to be heard in person or not.

6. A statement of allegations is enclosed.

[Large handwritten scribble]

District Police Officer
Swat
[Signature]

No. 97 /PA,
Dated: 19-12 /2018.

*stenor
please proceed
as per rules.*

Attested to be True Copy
[Signature]
Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

SUPERINTENDENT OF POLICE,
UPPER SWAT.
21/12/18

DISCIPLINARY ACTION

17

1. Syed Ashfaq Anwar, PSP District Police Officer, Swat being competent authority, is of the opinion that he Head Constable Jamil Ur Rahman while posted as MHC Police Station Madyan has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omissions as defined in Rule 2 (iii) of Police Rules 1975 with amendments 2014 vide Notification No.3859/Legal, dated 27-08-2014 of the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar, as per Provincial Assembly of Khyber Pakhtunkhwa Notification No. PA/Khyber Pakhtunkhwa/ Bills/ 2011/44905 dated 16/09/2011 and C.P.O, K.P.K Peshawar Memo: No. 3037-62/Legal, dated 19/11/2011.

STATEMENT OF ALLEGATIONS

It has been reported that he while posted as MHC Police Station Madyan committed the following act / acts, which is / are gross misconduct on his part as defined in Rules 2 (iii) of Police Rules 1975.

A case vide FIR No. 690, dated 13-12-2018 u/s 9C-CNSA/15AA was registered in Police Station Madyan against an accused namely Mubarak Ali who was put in the lockup of the Police Station. He was required to keep proper watch on the detained accused but he failed to fulfill his responsibility. As such the accused managed to escape from the lockup which caused an embarrassing situation for Police department.

2. For the purpose of scrutinizing the conduct of the said officer with reference to the above allegations, SP Upper, Swat is appointed as Enquiry Officer.

3. The enquiry officer shall conduct proceedings in accordance with provisions of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused officer and submit his findings immediately.

4. The accused officer shall join the proceedings on the date, time and place fixed by the enquiry officer.

District Police Officer
Swat

No. 97 /PA, Dated Gulkada the, 19-12 2018.

Copies of above to:-

1. SP Upper, Swat for initiating proceeding against the accused Officer/Official namely Head Constable Jamil Ur Rahman No. 350 under Police Rules, 1975.

2. Head Constable Jamil Ur Rahman No. 350

With the direction to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer for the purpose of enquiry proceeding.

Attested to be True Copy

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

ضیقا عالی

حوالہ مشمولہ چارج تفتیش ندری 97 قدرہ 19/12/08 فارید ضیاب DPO
 صاحب سوات ملروٹی خدمت میں کہ خواہ 08 مورخہ 31 مورخہ 13/08/08 بحیثیت قدر
 تھانہ مدینہ انصیاب - ہیکر اپنے فرائض انتہائی ایمانداری اور جانپوشی سے سر انجام
 دے رہا تھا۔ مورخہ 13/12/08 کو ان ڈیوٹی تھانہ میں موجود تھا کہ حوالہ مقدمہ عدالت
 عدالت 690 مورخہ 13/12/08 حیرانجی 9CCNSA-9BCNSA-15AA قضاہ مدینہ
 بہ خدای ملزمان ج مبارک علی عرف ماکو @ منیف الدھن عرف منیفورہ لہران
 محمد رفیق عرف ماکان ساکنان گھڑی مکے مدینہ مقدمہ قائم ہو کر ملزمان گرفتار
 شدہ کو بعد مکروہ جہد تلاشیں مندرجہ حوالات تھانہ کی گئی جو کہ میں نے حوالات کو
 درست طور پر تیار کیا کہ مندرجہ اور سابقہ ہی ان ڈیوٹی سنتری کو کوری تکرانی
 کی ہدایات ری بوقت تقریباً 18:45 بجے ان ڈیوٹی سنتری کپٹن سعید اللہ خان
 3435 جو کہ حوالات پر ان ڈیوٹی موجود تھا۔ روزانہ حیدر دند اگر بتلایا کہ ملزمان رفع حاجت
 کرنا چاہتے ہیں چونکہ حوالات کے اندر کوئی باقوروم / وائس قابل استقبال موجود نہ تھا
 مدینہ و ملزمان کو رفع حاجت کے خاطر تھانہ کے اندر واقع دوسرے وائس روم
 لے جانا پڑتا ہے۔ سنتری کو ایک ایک ملزم کو مندرجہ باقوروم لے جانے کے بعد کوری
 سنتری مذکورہ نے ملزم منیف الدھن عرف منیفورہ کو تعقیب کا لگائی جا کر رفع حاجت
 کے خاطر لے گیا۔ حیدر حوالات کو درست بند کیا گیا۔ میں ہی دوسرے کارسکار میں دفتر
 روزانہ حیدر میں معدوم ہوا۔ حیدر میڈیک ساقہ باجی سید عمر 2357-LHC ہی دفتر روزانہ
 میں ان ڈیوٹی موجود تھا۔ ملزم بالا کو سنتری مذکورہ بالائے بعد رفع حاجت لاکر بند
 حوالات کی۔ حیدر روزانہ حیدر اگر بتلایا کہ ملزم مبارک علی عرف ماکو حوالات میں
 عدم موجودگی میں۔ خود حوالات ملائے لاکر واقعی ملزم مبارک علی عرف ماکو حوالات
 عدم موجودگی۔ حیدر باجی سید عمر 2357 اور دیگر اعلیٰ کاروں کو ہواہ کر کے تھانہ
 اندر تلاش کیا۔ ملزم مذکورہ ملزم تھانہ میں ہی نہیں ملا۔ حیدر حوالات کا تیار
 درست طور پر تیار ہوا۔ حیدر صاحبہ 2357 صاحبہ کے نوٹس میں مندرجہ مورائیل رائی
 کے حیدر حالات سے آگاہ کیا۔ 5110 صاحبہ نے تھانہ آکر سرپرست میڈیک اور
 حوالات سنتری سعید اللہ خان نمبر 3435 اور میں نے سنتری حیات علی نمبر 303
 اور ملزم مبارک علی عرف ماکو بالا کے خلاف حوالہ مقدمہ عدالت 690 مورخہ 13/12/08 صبر
 223-224 تھانہ مدینہ مقدمہ رفع حاجت کی۔ حیدر بعد میں علاقہ لہران

CAC
 Adv
 Adv

ملزم مبارک علی عرف نامو کو محمد ابراہیم قاضی مدین میں پیش کر کے جیلو حبس کیا گیا اور گرفتار کیا گیا۔ SHO صاحب نے موجودگی ضابطہ DSP صاحب سرمل مدین اور علاقہ ڈسٹریکٹ جس میں رہائش گاہ ہے DSP شہر جان خان بھی شامل ہے۔ حیدر دیکر افسر اطلاعات انوسٹی گیشن سٹاف ملزم مبارک علی بارا سے دریافت کیا کہ کس طرح حوالات قحاند سے مندرجہ ہوئے۔ ملزم نے جواباً بتایا کہ حوالات کے سلاخوں کو ٹھیکر ہا کر کے نقل کر فرار ہو گیا تھا۔ SHO صاحب کے حوالے سے موجودگی پولیس افسر ان اطلاعات ذکر شدہ ملا حوالات قحاند سے سلاخیں ٹھیکر ہا کر کے نقل کر کے دیکھا حیدر SHO صاحب سے معروف نے FIR متن میں حوالات کا تاہم خلاصہ جوڈ کر ملزم کا فرار ہونا تحریر کی ہے جو کہ اصل حقائق کے بالکل برعکس ثابت ہوئی۔ حیدر میں نے بحیثیت محرم کی بار ضابطہ SHO صاحب کے نوٹس میں لایا گیا ہوں کہ حوالات کے سلاخیں مندرجہ ہے حیدر اس نیت سرکاری منتڈ سے حوالات ریسپور کرنے کے خاطر افسر ان ملا کے خدمت میں اٹھری درخواست جی ملکی تھی۔ جو کہ SHO صاحب نے فاروڈ کرنے کے بجائے چھاپو دیا تھا اور جی کیا تھا کہ آپ تو میرا خلاف لکھ رہے ہوں۔ حیدر بعد وقوع SHO صاحب نے ویڈیو کو بلوا کر حوالات کے سلاخوں کو مزید سہ سے لگائے گئے۔ اگر بروقت یعنی وقوع سے پہلے اگر SHO صاحب حوالات کا حینٹس کرتے تو یہ وقوعہ رونما نہیں ہوتا، حوالات قحاند کا وقوعہ سے پہلے کا تصویب SHO صاحب کا ملزم کو حوالات سے بار بعد سلاخوں ٹھیکر کر کے نقل کر کے دیکھوں پیش کرنے کے تصاویر حیدر بعد وقوع حوالات قحاند کے مدعتی کے بعد کے تصاویر پیش کرتا ہوں۔ چونکہ میں نے بروقت حوالات مد سنٹری کیفیات کی تھی اور وقت کے وقت ہی میں دفتر روزنامہ میں کارس کار میں معروف تھا۔ ملزم حالات میں میں نے 05 بجے بحیثیت محرم میں نے اپنے ڈیوٹی احسن طریقے سے نبھائی ہے۔ ایک مزید نوٹ یہ ہے تعلق اور سلیبے کا واحد زمرہ ہوں۔ استاد عابد حکمران کو تیری بلا عزیز ماروئی مائیل کرنے کی سفارش فرمائی جاوے۔ تا مگر دعا گو رہوگا۔

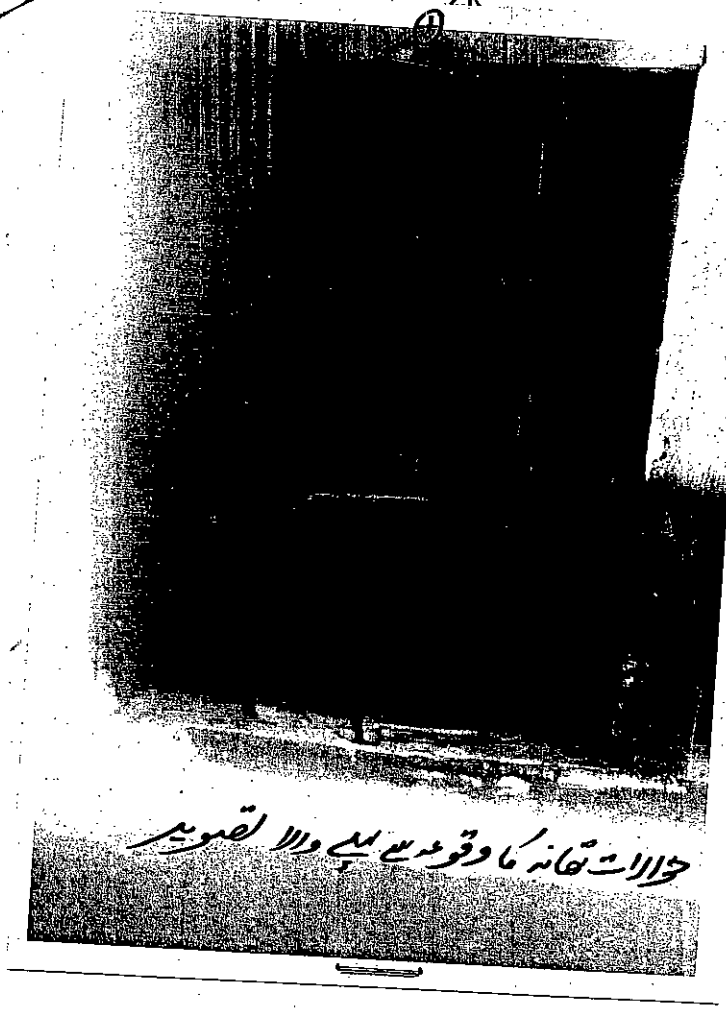
حیدر

حیدر ٹھیکر جیل لائن نمبر 50
 سابقہ محرم قحاند مدین سوا
 حال پولیس لائن کہیں
 25/12/018

Attested to be True Copy
 Shabir Ahmad Khan (Dawlat Khel)
 Advocate High Court
 & Federal Shariat Court

۵۴۵

۲۵



حوالات تھانہ کا وقوع سے پہلے والا تصویر

ضبا ۵۴۵ صاحب کے تعزیت پر ملزم مبار علی عرف کانگر کا حوالہ سے لکھنے کا ٹیپوں پیش کرنا



تصویر نمبر ۱

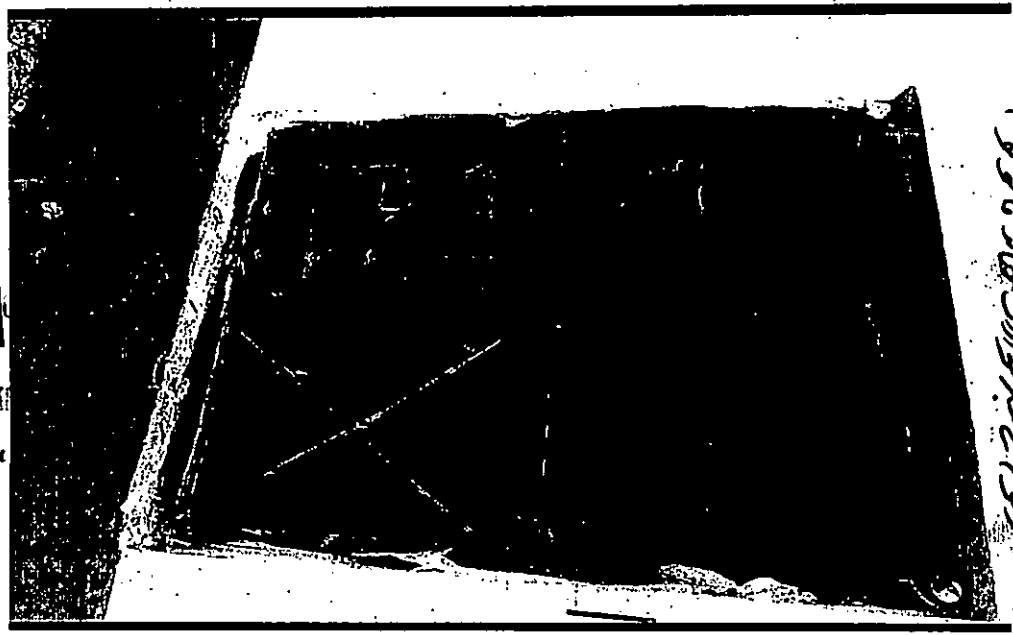
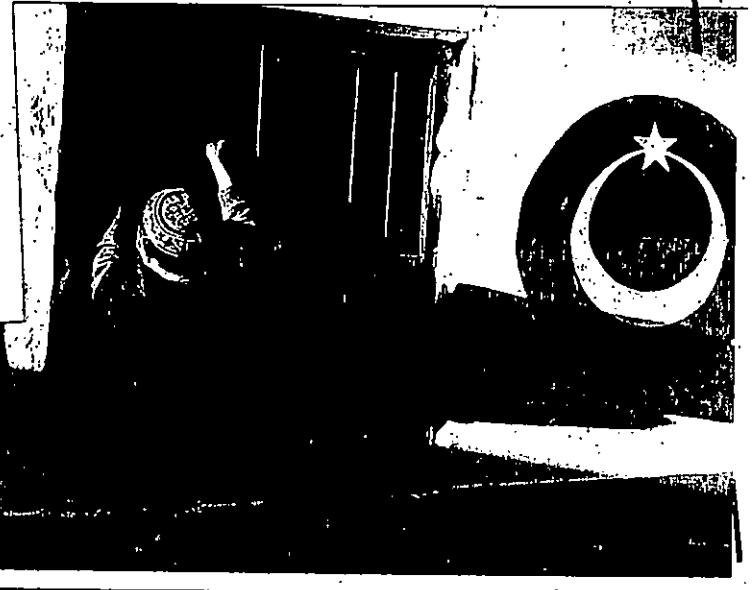
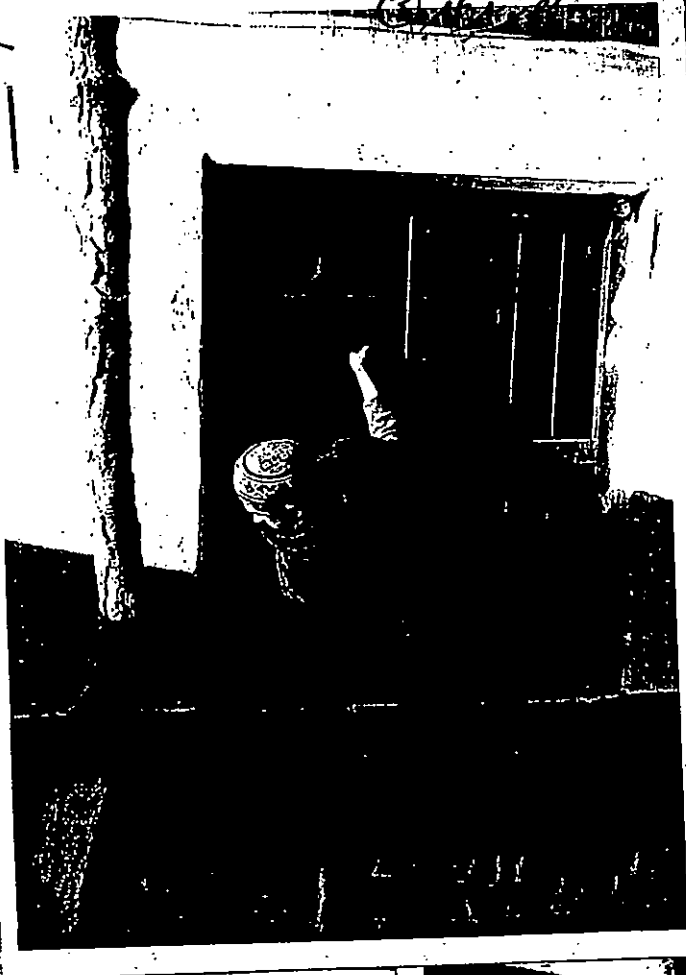
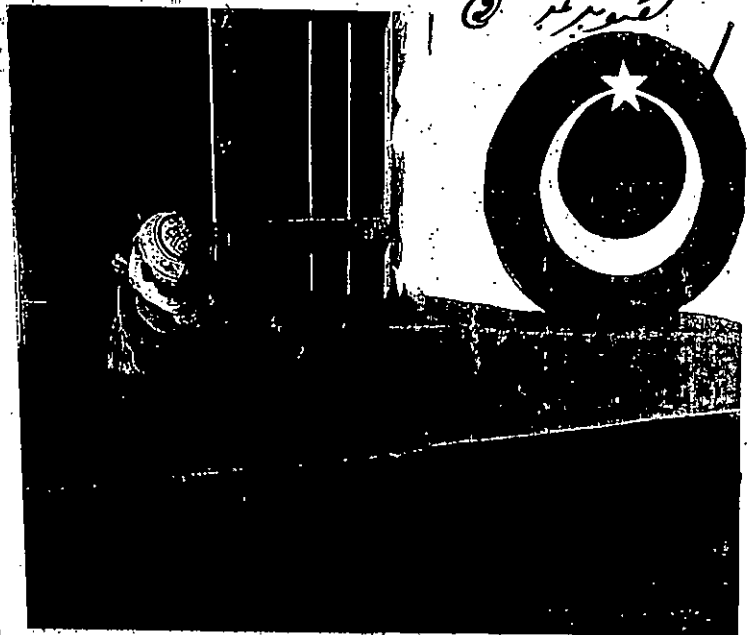
Attested to be True Copy

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

(2)

علم کا 5110 صاحبہ عدالت پر سلاخوں کے ذریعے لٹکانے کا ڈھبوں پیش کرتے وقت فوٹوز

لغتو بربر (2)



فوتوز کے بعد عدالت کا فوٹو

Attested to be True

Shabir Ahmad (Dawlat Ki Adli) & Federal Shariat Court

Annex "E"

22


ORDER

This order will dispose of Departmental Enquiry against Head Constable Jamil ur Rahman No. 350 of this District Police. He while posted as MHC Police Station Madyan was alleged of gross misconduct as a case vide FIR No. 690, dated 13-12-2018 u/s 9C-CNSA/15AA was registered in Police Station Madyan against an accused namely Mubarak Ali who was put in the lockup of the Police Station. The delinquent Head Constable was required to keep proper watch on the detained accused but he failed to fulfill his responsibility. Resultantly, the accused managed to escape from the lockup which caused an embarrassing situation for Police department.

He was immediately suspended and closed to Police Lines which was followed by a regular enquiry against him. As such he was issued a charge sheet and statement of allegations vide this office No. 97/PA, dated 19-12-2018 and SP Upper, Swat was directed to carryout regular enquiry against the delinquent Head Constable. The Enquiry Officer after carrying out the needful reported that the Police Officer under enquiry was guilty of misconduct further reporting that due to his negligence the detainee managed to escape from the lockup.

Being on responsible position, the Police Officer under enquiry was required to keep proper watch on the lockup where an accused of a heinous crime was detained but he took the issue casually and failed to effectively supervise the lockup. As such the accused managed to escape from the lockup which caused an embarrassing situation for Police. His this act is against discipline and unbecoming of a responsible Police Officer. This warrants punishment. Hence, in exercise of the powers vested in the undersigned under Rules 2 (iii) of Police Disciplinary Rules - 1975, I Syed Ashfaq Anwar, DSP, District Police Officer, Swat being competent authority, am constrained to award him punishment of reversion to a lower rank. He is also reinstated from suspension.

Order announced.


District Police Officer
Swat

O.B. No. 21

Dated: 13/12/2018

- Copy to:-
- 1 Establishment Clerk
- OSI
- For necessary action, please.

Attested to be True Copy

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

ORDER:

This order will dispose of Departmental Enquiry against Head Constable Jamil Ur Rahman No. 350 of this District Police. He while posted as MHC Police Station Madyan was alleged of gross misconduct as a case vide FIR No. 690, dated 13-12-2018 u/s 9C-CNSA/ 15AA was registered in Police Station Madyan against an accused namely Mubarak Ali who was put in the lockup of the Police Station. The delinquent Head Constable was required to keep proper watch on the detained accused but he failed to fulfill his responsibility. Resultantly, the accused managed to escape from the lockup which caused an embarrassing situation for police department.

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Order announced.

District Police Officer
Swat

O.B No. 21

Dated 08/02/2019

Copy to: -

1. Establishment Clerk
2. OSI

For necessary action, please.

Attested to be True Copy

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

BETTER COPY PAGE NO.
OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND
AT SAIDU SHARIF, SWAT
Ph: 0946-9240381-88, & Fax No. 0946-9240320
Email: digmalakand@yahoo.com

26

ORDER:

This order will dispose off mercy petition of Constable Jamil Rahman of Swat District for restoration of rank as Head Constable.

Brief facts of the case are that Ex-Head Constable Jamil Ur Rahman No. 350 while posted as MHC Police Station Madyan was alleged of gross misconduct as an accused namely Mubarak Ali involved in case vide FIR No. 690 dated 13/12/2018 u/s 9C-CNSA / 15-AA Police Station Madyan was put in the lockup of the police Station. The delinquent HC was required to keep proper watch on the detained accused but he failed to fulfill his responsibility. Resultantly, the accused managed to escape from the lockup which caused an embarrassing situation for Police Department, He was issued Charge Sheet with statement of allegations and SP Upper, Swat was appointed as enquiry officer. The enquiry officer after conducting proper enquiry submitted his findings, wherein the allegations leveled against the delinquent Head Constable were proved. Being found guilty of the charges leveled against him, the District Police Officer, Swat awarded punishment of reversion to a lower rank of Constable vide his office OB No. 21 dated 13/02/2019.

He was called in orderly Room on 13/05/2019 and heard him in person. The petitioner could not produce any cogent reason in his defense. Therefore, his appeal for restoration of rank is Head Constable is hereby filed.

Order announced.

Attested to be True

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

(MUHAMMAD SAEED), PSP

(Regional Police Officer,

Malakand, at Saidu Sharif, Swat

5734/E,

Dated 16.05.2019

Copy to District Police Officer, Swat for information and necessary action with to his officer Memo: No. 4805/E, dated 20/03/2019. Fauji Missal of the above named official is attached herewith for record in your office.

حضور جناب PPO صاحب محکمہ پولیس صوبہ خیبر پختونخواہ

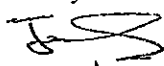
(27)

عنوان: رحم درخواست بابت بحال کرنے ہیڈ کنسٹیبلری"

بنتاب عالی!

بحوالہ مشمولہ آرڈر نمبر 5734 صدرہ 16/05/2019 مجاریہ دفتر جناب DIG صاحب ملاکنڈ ڈوژن معروض خدمت کہ ماہ اگست سال 2018 میں پہلی بار بحیثیت محرر تھانہ مدین سوات تعینات ہو کر اپنی ڈیوٹی نہایت ایمانداری سے انجام دی رہا تھا۔ بحوالہ علت نمبر 690 مورخہ 13/12/2018 بجرائم 9CCNSA-9BCNSA-15AA تھانہ مدین مقدمہ درج رجسٹر ہو کر ملوث دو ملزمان کو بعد جامد تلاشی بندہ حوالات تھانہ کر کے حوالات تھانہ پر سنتریان کی ڈیوٹیاں لگائی جا کر کڑی نگرانی کی ہدایت مناسب دی گئی بوقت تقریباً 18:45 بجے شام ان ڈیوٹی سنتری نے ایک ملزم کو رفع حاجت کے خاطر تھانہ ہرا کے اندر موجود واش روم ہتکڑیاں لگا کر لے گیا۔ کیونکہ حوالات تھانہ میں کوئی واش روم نہیں تھا۔ جبکہ میں دفتر روز نامچہ میں کار سرکار میں مصروف تھا جو کہ سنتری ان ڈیوٹی نے ملزم کو بعد رفع حاجت لاکر بند باحوالات کر کے دفتر روز نامچہ آکر بتلایا۔ کہ حوالات تھانہ میں بند دوسرا ملزم حوالات میں عدم موجود ہے۔ جو کہ میں نے فوری طور پر ہمراہ دیگر نفری پولیس بلڈنگ تھانہ میں تلاش کی جو کہ عدم موجود پایا۔ جبکہ جناب SHO صاحب ملزم / سنتریان کے علاوہ میرے خلاف بھی مقدمہ درج رجسٹر کی۔ جبکہ بعدہ ملزم دوبارہ گرفتار کیا گیا۔ جملہ حلات میں میزرا کوئی تصور نہیں ہے کیونکہ میں نے بروقت حوالات تھانہ پر سنتریان کی ڈیوٹیاں لگائی تھی اور کڑی نگرانی کی ہدایات دی تھی۔ جبکہ خود کار سرکار میں مصروف تھا۔ میری خلاف درج کردہ مقدمہ میں کیس عدالت جوڈیشل مجسٹریٹ بحرین میں زیر سماعت ہے۔ جو کہ میرے حق میں فیصلہ متوقع ہے۔ جبکہ جناب DPO صاحب نے من سائیل کو ہیڈ کنسٹیبل سے ریورڈ کرنے کا سزایاب کیا تھا۔ جو کہ بعدہ میں نے جناب DIG صاحب کے خدمت میں رحم اپیل بابت بحالی ہیڈ کنسٹیبلری درخواست گزار کر صاحب موصوف نے درخواست فائیل کرنے کی حکم صادر فرمائی ہے۔

لہذا آپ صاحبان کے حضور میں رحم درخواست پیش خدمت ہے۔ مہربانی فرما کر سائیل کو دوبارہ ہیڈ کنسٹیبل ریک پر بحال کرنے کا حکم صادر فرمادے سائیل تاحیات دعا گور ہے گا۔



جیل ارحمان نمبر 350 پولیس لائن کبل سوات KPK

مورخہ: 05/08/2019

Attested to be True Copy

Shabir Abbas Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court



2902/E
23-9-19
3279

28

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

19, dated Peshawar the 17 09

The Regional Police Officer
Malakand at Swat Swat

OFFICE OF THE D.P.O.
Swat at Saidi Street
759/0
Date 24.9.19

Subject: MERCY/APPLICATION.

Please refer to your office Memo No 266/67 E, dated 20.08.2019.
The Competent Authority has examined and fixed the merit of the application submitted by Constable Jamil ur Rahman No 350 (the then HC) of Swat and the merit of reversion to lower rank of Constable awarded by District Police Swat dated 15.02.2019, being badly time barred.
The Officer may please be informed accordingly.

No [14582] IE
DT 25-9-019
iDsp Hgv?

(SYED AHMED HASSAN)
Registrar
Inspector General of Police
Khyber Pakhtunkhwa
Peshawar

Pl. Inform Constable for inaction
Jamal ur Rehman
No 350 of J's Police Swat
accordingly.

District Police Officer
SWAT
24/9

No-10254 IE,
dt 24/09/19
FE/DPD Swat
For information & in
the concern accordingly

OFFICE SUPD:
For DP Swat
25/9/19

Office Swat:
For: Regional Police Officer,
Malakand at Saidi Street Swat

Attested to be True Copy

Shabir Ahmad Khan (Dawlat Khel)
Advocate High Court
& Federal Shariat Court

AEC
also use w/h
S-17
S-Roll accordingly

CO-MAN
7044 N/ACTION
DSD HQ SWAT
09/10/015

28

BETTER COPY PAGE NO

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA

General Police Office: Peshawar

No.S/19, dated Peshawar the 17/09/2019

To, The Regional Police Officer
Malakand at Saidu Sharif, Swat

Subject: MERCY / APPLICATIONS.

Memo:

Please refer to your office Memo: No. 9160 -67/E, dated 20/08/2019.

The Competent Authority has examined and filed the application revision petition submitted by Constable Jamil Ur Rahman No. 350 (the then HC) of Swat district Police against me for punishment of reversion to lower rank of Constable awarded by District Police Office, Swat via OS No. 21, dated 13/02/2019, being badly time barred.

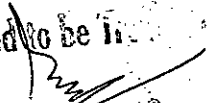
The Applicant may please be informed accordingly.

Syed Anis Ul Hassan)

Registrar

For Inspector General of Police

Khyber Pakhtunkhwa, Peshawar

Attested to be true

Shabir Ah. Khan (Dawat Khel)
Advocate High Court
& Federal Shariat Court

(30)

BEFORE THE ~~KHYBER PAKHTUN KHWA SERVICE~~
~~TRIBUNAL AT PESHAWAR.~~

WAKALAT NAMA

Titled: _____ of 2019

TAMIL UR REHMAN VERSUS I.G.P & Others.

I/We do hereby appoint SHABIR AHMAD KHAN ADVOCATE, in the above mentioned case, to do all or any of the following acts, deeds and things:

- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

IN WITNESS whereof I/we have signed this *Wakalatnama* hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this

FS

Signature of Executant

ATTESTED & ACCEPTED BY:

Shabir Ahmad Khan

SHABIR AHMAD KHAN
Advocate, High Court

5/11/2019

"B"

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

Form A&B Ser. Tribunal

No.

Appeal No. 1508 of 20 19

Jamil ur Rehman Appellant/Petitioner

Versus

P.P.O. 16 P.P. Pesh. Respondent

Respondent No. 2

Notice to: — Regional Police officer Malakand R-111
at Saidi Sharif Swat.

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 8-4-2020 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 11/4

Day of March 20 20

at Camp Court Swat

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

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

"B"

A&B Ser. Tribunal

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

No.

TB

Appeal No.....1508..... of 20 19

Jamil ur Rehman.....Appellant/Petitioner

Versus

P.P.O. K.P.C. Pesh......Respondent

Respondent No.....3.....

Notice to: - Distt. Police officer, Swat

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....8-4-2020.....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.....17/4.....
Day of.....March.....20 20.

at Camp Court Swat

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

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

"B"

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

TB

No.

Appeal No. 1508 of 20 19

Jamil ur Rehman Appellant/Petitioner

P P O, KPK Pesh: Respondent

Respondent No. 4

Notice to: -

SHO, Halim Khan, P. S. Madyan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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~~ 8 formed that the said appeal/petition is fixed for hearing before the Tribunal *on.....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..... 11/11

Given under my hand and the seal of this Court, at Peshawar this.....
Day of..... March 20 20

at Camp Court Suiat
(S)

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"

A&B Ser. Tribunal

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

113

No.

Appeal No. 1508 of 2019

Jamil ur Rehman Appellant/Petitioner

P P O, 14 Pk Pesh: Respondent

Respondent No. 5

Notice to: Constable Sadullah Jan, 3335/SPF,
Posted at P.S. Madyan.

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 8-9-2020 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 11/11

of March 2020

at Camp Court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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2. Always quote Case No. While making any correspondence.

"B"

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

No.

TB

Appeal No. 1508 of 20 19

Jamil ur Rehman Appellant/Petitioner

Versus

P.P.O, 16 Pk Pesh. Respondent

Respondent No. 6

Notice to:

Constable Hayat Ali 303/R Posted at P.S, Madyan.

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 8-4-2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 11th

Day of March 2020

at Camp Court Swat

[Handwritten Signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

No.

TIB

Appeal No.....1508..... of 20 19

Jamil ur Rehman.....Appellant/Petitioner

Versus

P.P.O., 14 P.K. Peshawar.....Respondent

Respondent No.....7.....

Notice to: —

Mubarak Ali, Alias Kakkar, S/O M. Rahman
R/O Gharzi Kalay Madyan Distt. Swat

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....8.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Day of.....March.....2020

at Camp Court Swat

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.
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"B"

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

TB

No.

Appeal No. 1508 of 20¹⁹

Jamil ur Rehman Appellant/Petitioner

PPO, KPIC Pesh: Respondent

Respondent No. I

Notice to: —

Provincial Police officer Govt: of
KPIC Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....
March 20
Day of.....20

11/11

at Camp Court Swat

9
17/3

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1508/2019

Constable Jamil Ur Rahmn No.350 posted at Police Line Swat.

..... Appellant

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

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4	Copy of report u/s 173 Cr.P.C	"A"	6


District Police Officer, Swat
(Respondent No. 3)

Service Appeal No. 1508/2019

Constable Jamil Ur Rahmn No.350 posted at Police Line Swat.

..... Appellant

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

PARAWISE REPLY BY RESPONDENTS

Respectfully Shewith,

PRELIMINARY OBJECTIONS.

1. That the appeal is badly barred by Law & limitation.
2. That the appellant has got no Cause of action and locus standi to file the present appeal.
3. That the appeal is bad due to misjoinder and nonjoinder of necessary parties.
4. That the appellant has not come to the Tribunal with clean hands.
5. That the instant appeal is not maintainable in its present form.
6. That the appellant has concealed the material facts from this Hon'ble Tribunal.

FACTS:

1. Pertain to record, hence needs no comments.
2. Incorrect. The appellant had performed his routine duty and no good entries have been found in his service record.
3. Pertain to record, hence needs no comments.
4. Incorrect. The appellant while posted as Muharrar Head Constable Police Station Madyan, an accused namely Mubarak Ali arrested in case FIR No.690 dated 13/12/2018 U/S 9CCNSA/15AA managed to escape from the lock up due to the negligence of the appellant. Being a responsible supervisory officer, he was required to keep proper watch on the lock up but he failed to fulfill his responsibility, resultantly the accused managed to escape from the lock up. Appellant has been found responsible in the case FIR No.691 during course of investigation. (Copy of report u/s 173 Cr.P.C enclosed as annexure "A")
5. Pertain to record, hence needs no comments.
6. Incorrect. That appellant was awarded proper punishment after the recommendation of Enquiry officer, wherein the charges were proved. All the codal formalities were fulfilled and opportunities of self defense and personal hearing were provided to the appellant at the time of departmental probe.

- 7. Incorrect. Departmental appeal of the appellant was thoroughly examined by the respondents and after taking lenient view the same was filed as the appellant failed to produce any cogent reason in his defence. Furthermore opportunity of personal hearing was provided to the appellant as evident from order annexed in appeal.
- 8. Incorrect. Second departmental appeal has no value under the rules when his first appeal was filed after thorough examination.
- 9. Incorrect. All the codal formalities were fulfilled during departmental probe. The appellant was properly heard in person and awarded appropriate punishment as per law/rules by the respondent.
- 10. The appellant has wrongly challenged the legal and valid order of respondents before this honorable Tribunal through unsound grounds.

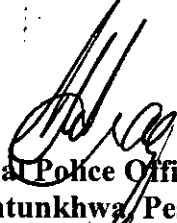
GROUNDS:


- i. Incorrect. The appellant was required to keep proper watch on the accused in lock up but he failed to fulfill his responsibility due to which an accused managed to escape from the lock up. Appellant being Muharrar of Police Station was duty bound to keep watch on each and every things of the lock up etc.
- ii. Incorrect. All the arrested accused are enter/exit from the lock up by the appellant being Muharrar of Police Stations at that time.
- iii. Incorrect. As explained above.
- iv. Incorrect. Correct to the extent that an FIR was lodged against the appellant due to gross misconduct on his part as an accused escaped from the lock up/custody of the appellant which has been proved from enquiry conducted by Enquiry Officer.
- v. Incorrect. The appellant had not performed his duty as he failed to keep watch on the accused in the lock up which led to escape of the accused from the lock up.
- vi. Incorrect. The orders of respondents are legal, lawfull and accordance with law rules. The appellant was awarded appropriate punishment after fulfilling all the codal formalities under the law/rules.
- vii. Incorrect. The appellant was provided all the opportunities of personal hearing and self defense during departmental probe where after he was awarded proper punishment.

- viii. Incorrect. The appellant was treated in accordance with law/rules and no violation of the law/rules has been made by the respondents during course of departmental probe/action.
- ix. Incorrect. As stated above, appellant was provided all the opportunities of personal hearing and self defense during departmental probe.
- x. Incorrect. No laws have been violated by the respondents and appellant was treated in accordance with law/rule providing all the opportunities of personal hearing and self defense during departmental probe.
- xi. Incorrect. The orders of the respondents are reasonable, based on justice and in accordance with law/rules.
- xii. That the respondents may be allowed to add any other grounds at the time of hearing of appeal.

PRAYER:

Keeping in views the above facts and circumstances, it is humbly prayed that the appeal of appellant being devoid of legal force may kindly be dismissed with costs.


Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No.01)


Regional Police Officer,
Malakand at Saidy Sherif, Swat
Regional Police Officer
Malakand Region
(Respondent No.02)


District Police Officer Swat
(Respondent No.03)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

4

Service Appeal No. 1508/2019

Constable Jamil Ur Rahmn No.350 posted at Police Line Swat.

..... Appellant

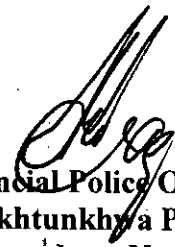
VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

AFFIDAVIT

We, the above respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/true to the best of our knowledge/ belief and nothing has been kept secret from the honorable Tribunal.



**Provincial Police Officer
Khyber Pakhtunkhwa Peshawar
(Respondents No.1)**



**Regional Police Officer,
Malakand at Sandu Sharif, Swat.
Regional Police Officer
Malakand Region
(Respondents No.2)**



**District Police Officer, Swat
(Respondents No.3)**

Service Appeal No. 1508/2019

Constable Jamil Ur Rahmn No.350 posted at Police Line Swat.

..... Appellant


VERSUS


Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

AUTHORITY LETTER

We, the above respondents do hereby authorized Mr. ~~Muhammad Hussain~~ Khan DSP/Legal Swat & Mr. Khawas Khan SI Legal to appear before the Tribunal on our behalf and submit reply etc in connection with titled Service Appeal.


Provincial Police officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 1)


Regional Police Officer,
Malakand at Saidu Sharif Swat.
Regional Police Officer
Malakand Region
(Respondent No. 2)


District Police Officer Swat
(Respondent No. 3)

"B"

**KHATUNKHWA SERVICE TRIBUNAL, PESHAWAR.
AL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

TR

Case No. 1508 of 20 19

Jamil ur Rehman Appellant/Petitioner

Versus

Govt P.O. K.P.K. Post Respondent

Respondent No. 7

Mubarak Ali, Alias Kakoo S/O M. Rahma
R/O Gharai Kalay Madyan Distt. Swat

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented and 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 7-10-2020 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 authorized 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 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 16/10/20

Day of Sep 20 20

at Camp Court Swat

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"

HTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
AL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

TB

1508

19

No. Jamit ur Retran of 20
Appellant/Petitioner
P.P.O., Versha Pk Pesh.

Respondent

Respondent No.

SHO, Halim Khan PS, Madyan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 16/14

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

Day of.....
at Camp Court Street

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

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
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"B"

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

78

Appeal No.....1508..... of 20 19

.....Jamil ur Rehman.....Appellant/Petitioner

Versus

.....P.O, P.P.C. Pesh.....Respondent

Respondent No.....5.....

Notice to: —

Constable, Sadullah Jan, 3535/SPF
Posted at P.S, Madyan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....7-10-2020.....at 8.00 A.M. If you wish to urge anything against the appelland/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Given under my hand and the seal of this Court, at Peshawar this.....16/10.....

Day of.....Sep.....20 20

at Camp Court Sweet

Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

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"B"

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

TB

Appeal No.....*1508*..... of 20 *14*

Jamil ur Rehman..... Appellant/Petitioner

Versus

P.P.O. 1st Flr P.O. No. 81..... Respondent

Respondent No.....

6
Constable, Hayat Ali, 303/R, Posted at
P.S, Madyan

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier 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.....*7-10-2014*.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Given under my hand and the seal of this Court, at Peshawar this.....*14/10*.....

Day of.....*Sep*.....20 *20*

at Camp Court Sweet

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and ~~General~~ Public Holidays.
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"A"

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

No.

TB

APPEAL No. 1508 of 20 19.

Jamil-ur-Rehman

Appellant/Petitioner

Versus

P.P.O. K.P.A. Pesh.

RESPONDENT(S)

✓
Notice to Appellant/Petitioner

Constable Jamil-ur-Rehman

Belt No. 350 Posted at

Police Line Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 7-12-2020 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 Swat

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

"B"

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

No.

18

Appeal No. 1508 of 2019
Constable Jamil-ur-Rahman
Appellant/Petitioner

The P.O. K.P.C. Pesh.
Respondent

Respondent No. 4

Notice to: -

SHO Halime Khan, P.S. Madyan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 20/11/2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Day of act:20 2019

at Camp Court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

TB

No.

Appeal No. 1508 of 20 19
Constable Jamil-ur-Rehman Appellant/Petitioner
 Versus
The P.P.O, 14 P/O Pesh: Respondent

Respondent No. 5
Constable Saadullah Jan, 3535/SPF
 Notice to: — Posted at P.S. Madyan.

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 7-12-2020 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.

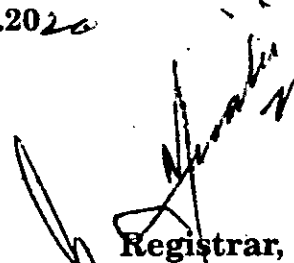
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition 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 20/11/2020

Day of Oct 2020

at Camp Court, Swat



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

TB

No.

Appeal No. 1508 of 2019
Constable Jamil-ur-Rehman Appellant/Petitioner
Versus
the P.P.O. 15 P/O Pesh. Respondent

Respondent No. 6

Notice to: —

Constable Hayat Ali, 303/R Posted
at P.S, Madyan

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 7-12-20 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....act:.....2020

at Camp Court Street

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.

TIB

No.

1508
Appeal No. of 20 19

Constable Jamil-ur-Rahman
..... Appellant/Petitioner

The P.O. 19 P.M. Pesh
..... Respondent

Respondent No.

Notice to:

Mubarak Ali, Alias Kakoo S/o M. Rahman
R/o Charai Kalay Madyan Distt. Swat

WHEREAS an appeal/petition under the provision of the North-West Frontier 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~~ ^{intimated} that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 2018

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

Day of.....20

at Corrip Court Swat

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.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1508/2019

Constable Jamil Far Rahmn No.350 posted at Police Line Swat.

..... Appellant

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

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2	Affidavit	-	4
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4	Copy of report u/s 173 Cr.P.C	"A"	6


District Police Officer, Swat
(Respondent No. 3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1508/2019

Constable Jamil Ur Rahmn No.350 posted at Police Line Swat.

..... Appellant

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

PARAWISE REPLY BY RESPONDENTS

Respectfully Shewith,

PRELIMINARY OBJECTIONS.

1. That the appeal is badly barred by Law & limitation.
2. That the appellant has got no Cause of action and locus standi to file the present appeal.
3. That the appeal is bad due to misjoinder and nonjoinder of necessary parties.
4. That the appellant has not come to the Tribunal with clean hands.
5. That the instant appeal is not maintainable in its present form.
6. That the appellant has concealed the material facts from this Hon'ble Tribunal.

FACTS:

1. Pertain to record, hence needs no comments.
2. Incorrect. The appellant had performed his routine duty and no good entries have been found in his service record.
3. Pertain to record, hence needs no comments.
4. Incorrect. The appellant while posted as Muharrar Head Constable Police Station Madyan, an accused namely Mubarak Ali arrested in case FIR No.690 dated 13/12/2018 U/S 9CCNSA/15AA managed to escape from the lock up due to the negligence of the appellant. Being a responsible supervisory officer, he was required to keep proper watch on the lock up but he failed to fulfill his responsibility, resultantly the accused managed to escape from the lock up. Appellant has been found responsible in the case FIR No.691 during course of investigation. (Copy of report u/s 173 Cr.P.C enclosed as annexure "A")
5. Pertain to record, hence needs no comments.
6. Incorrect. That appellant was awarded proper punishment after the recommendation of Enquiry officer, wherein the charges were proved. All the codal formalities were fulfilled and opportunities of self defense and personal

- 7. Incorrect. Departmental appeal of the appellant was thoroughly examined by the respondents and after taking lenient view the same was filed as the appellant failed to produce any cogent reason in his defence. Furthermore opportunity of personal hearing was provided to the appellant as evident from order annexed in appeal.
- 8. Incorrect. Second departmental appeal has no value under the rules when his first appeal was filed after thorough examination.
- 9. Incorrect. All the codal formalities were fulfilled during departmental probe. The appellant was properly heard in person and awarded appropriate punishment as per law/rules by the respondent.
- 10. The appellant has wrongly challenged the legal and valid order of respondents before this honorable Tribunal through unsound grounds.


GROUNDS:


- i. Incorrect. The appellant was required to keep proper watch on the accused in lock up but he failed to fulfill his responsibility due to which an accused managed to escape from the lock up. Appellant being Muharrar of Police Station was duty bound to keep watch on each and every things of the lock up etc.
- ii. Incorrect. All the arrested accused are enter/exit from the lock up by the appellant being Muharrar of Police Stations at that time.
- iii. Incorrect. As explained above.
- iv. Incorrect. Correct to the extent that an FIR was lodged against the appellant due to gross misconduct on his part as an accused escaped from the lock up/custody of the appellant which has been proved from enquiry conducted by Enquiry Officer.
- v. Incorrect. The appellant had not performed his duty as he failed to keep watch on the accused in the lock up which led to escape of the accused from the lock up.
- vi. Incorrect. The orders of respondents are legal, lawfull and accordance with law rules. The appellant was awarded appropriate punishment after fulfilling all the codal formalities under the law/rules.
- vii. Incorrect. The appellant was provided all the opportunities of personal hearing and self defense during departmental probe where after he was awarded proper punishment.


- viii. Incorrect. The appellant was treated in accordance with law/rules and no violation of the law/rules has been made by the respondents during course of departmental probe/action.
- ix. Incorrect. As stated above, appellant was provided all the opportunities of personal hearing and self defense during departmental probe.
- x. Incorrect. No laws have been violated by the respondents and appellant was treated in accordance with law/rule providing all the opportunities of personal hearing and self defense during departmental probe.
- xi. Incorrect. The orders of the respondents are reasonable, based on justice and in accordance with law/rules.
- xii. That the respondents may be allowed to add any other grounds at the time of hearing of appeal.

PRAYER:

Keeping in views the above facts and circumstances, it is humbly prayed that the appeal of appellant being devoid of legal force may kindly be dismissed with costs.


Provincial Police Officer,
Khyber Pakhtunkhwa/Peshawar
(Respondent No.01)


Regional Police Officer,
 Malakand at Saidy Sharif, Swat
Regional Police Officer
Malakand Region
(Respondent No.02)


District Police Officer Swat
(Respondent No.03)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

24

Service Appeal No. 1508/2019

Constable Jamil Ur Rahmn No.350 posted at Police Line Swat.

..... Appellant

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

AFFIDAVIT

We, the above respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/true to the best of our knowledge/ belief and nothing has been kept secret from the honorable Tribunal.



**Provincial Police Officer
Khyber Pakhtunkhwa Peshawar
(Respondents No.1)**



**Regional Police Officer,
Malakand at Sandu Sharif, Swat
Regional Police Officer
Malakand Region
(Respondents No.2)**



**District Police Officer, Swat
(Respondents No.3)**

Service Appeal No. 1508/2019

Constable Jamil Ur Rahmn No.350 posted at Police Line Swat.

..... Appellant


VERSUS


Provincial Police Officer, Khyber Pakhtunkhwa, at CPO Peshawar & others.

....Respondents

AUTHORITY LETTER

We, the above respondents do hereby authorized Mr. ~~Abdullah Hussain~~ Khan DSP/Legal Swat & Mr. Khawas Khan SI Legal to appear before the Tribunal on our behalf and submit reply etc in connection with titled Service Appeal.


Provincial Police officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 1)


Regional Police Officer
Malakand Region Swat
Regional Police Officer
Malakand Region
(Respondent No. 2)


District Police Officer Swat
(Respondent No. 3)

بابت

Amex-2A

6

223-224 13/08/2018

District Police Swat

31-12-08

کتابت

Deputy Superintendent of Police Swat

1-2-3-4-5-6

7-8-9-10-11-12

13-14-15-16-17-18

19-20-21-22-23-24

ATTESTED

6

Deputy Superintendent of Police Swat

Handwritten notes in Urdu, including 'کتابت' and various administrative details.

Handwritten notes in Urdu, including 'ATTESTED' and 'Deputy Superintendent of Police Swat'.

حالیہ سیشن کے دوران کئی نئے مسائل پیش آئے ہیں۔ ان میں سے کئی مسائل کا
حل تلاش کرنے کے لئے کئی ایسے مسائل پیش آئے ہیں جن کا حل اب تک
پیدا نہیں کیا گیا ہے۔ یہ مسائل اس لئے پیش آئے ہیں کہ
کئی نئے مسائل ابھی تک حل نہیں ہو سکے ہیں۔ اس لئے
میں نے ان مسائل کو اس سیشن میں پیش کیا ہے تاکہ
ان کے حل تلاش کرنے کے لئے کئی ایسے مسائل
پیدا کیے جاسکیں۔ ان مسائل کے حل تلاش کرنے
کے لئے کئی ایسے مسائل پیش آئے ہیں جن کا
حل اب تک نہیں پایا گیا ہے۔ یہ مسائل اس لئے
پیش آئے ہیں کہ کئی نئے مسائل ابھی تک
حل نہیں ہو سکے ہیں۔ اس لئے میں نے ان
مسائل کو اس سیشن میں پیش کیا ہے تاکہ ان
کے حل تلاش کرنے کے لئے کئی ایسے مسائل
پیدا کیے جاسکیں۔

Dr. [Signature]

Shreya - Medgaya

27 - 12 - 2018

"A"

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

TB

No.

APPEAL No. 1508 of 20 19

Jamil ur Rehman

Appellant/Petitioner

Versus

P.P.O, KPK Pesh:

RESPONDENT(S)

✓
Notice to Appellant/Petitioner

Jamil ur Rehman Belt No. 350,

Posted at Police Line

Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13.03.21 at 1:00 PM

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 Swat

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 1503 of 2019.

103

Jamil ur Rehman

Appellant/Petitioner

Versus

PPO, KPIC Pesh:

RESPONDENT(S)

Notice to Appellant/Petitioner Counsel Shabir Ahmad Khan
Advocate High Court

Office Hazara Law Chamber Dubai Plaza
Near Azad Medical Company Dakkhara Road
Mingora Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 1-3-2021 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 Swat

H. Ghani
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“B”

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

1B

No.

Appeal No. 1508 of 20¹⁹

Jamil ul Rehman Appellant/Petitioner

The PPO, KPIC Pesh: Respondent

Respondent No. 2

Notice to:

Regional Police Officer, Malakand R-111
at Saich 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 on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 12/11.....

Day of Feb: 21 20¹⁹

at camp court Swat

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.

7B

Appeal No..... 1578 of 20 19

..... Jamil ur Rehman Appellant/Petitioner

Versus

..... The P.P.O, 14 P.O. Pesh. Respondent

Respondent No..... 3

Notice to:

Distt. Police Officer 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 on 1-3-2021 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.

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Given under my hand and the seal of this Court, at Peshawar this..... 12/11

Day of..... Feb: 20 21

at Camp Court Swat

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

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"B"

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

No.

TB

Appeal No.....15178..... of 20 13

.....Jamil Ahmad Khan..... Appellant/Petitioner

Versus

.....The P.P.O., 14 P.O. Pesh...... Respondent

Respondent No.....4.....

Notice to:

S/O, Halis Khan P.S. Madyan

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.....1-3-2013.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Given under my hand and the seal of this Court, at Peshawar this.....13 Feb.....
 Day of.....Feb.....20 2013

at Camp Court Swat

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

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“B”

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

No.

JB

Appeal No. 1508 of 20 19

Jamil M. Rehman Appellant/Petitioner

Versus

The P.P.O. K.P.K. Pesh. Respondent

Respondent No. 5

Notice to:

Constable Saadullah Jan, 3535/SPF
Posted at P.S. Madyan

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 1-3-2021 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.

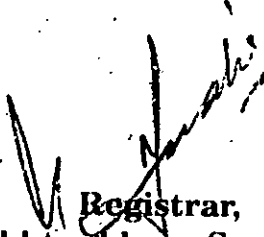
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Given under my hand and the seal of this Court, at Peshawar this 12/11

Day of Feb. 20 21

at Camp Court Swat


 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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"B"

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

TR

No.

Appeal No. 1508 of 20 19

Jamil vs Rehman

Appellant/Petitioner

Versus

The P.P.O. K.P.U. Pesh.

Respondent

Respondent No.

Constable Hayat Ali 303/R posted at

Notice to:

P.S. Madyan

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 1-3-2021 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.

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12/11

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

Day of Feb:20 21

at Camp Court Swat



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

FB

No.

Appeal No. 1508 of 20 19

Jamil ur Rehman Appellant/Petitioner

Versus

PPO, KPPK Pesh. Respondent

Respondent No. 7

Notice to:

Mubarak Ali alias Kakoo, S/O M. Rahman
R/o Ghazai Kalay Madyan 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 on 1-3-2021 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 12/10

Day of Feb:20 21

at Camp Court Swat


 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

“B”

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

No.

Appeal No. 508 of 20 19
Jamil w/ Rehman
Appellant/Petitioner

Im PPO, KPK Pesh:
Respondent
I

Provincial Police Officer at CPO, KPK
Peshawar
Respondent No.

Notice to:

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 12-3-2021 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 12/11

Given under my hand and the seal of this Court, at Peshawar this
Day of Feb; 21 20

at Camp Court Swat
12/12

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

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

"A"

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

No.

TB

APPEAL No.....1508..... of 2021

Jamil ur Rahman

Appellant/Petitioner

Versus

P.P.O, W.P.S. Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Jamil ur Rahman Belt No. 350,
Posted at Police Line Suwat

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

25/8/2021

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 Comp Court Suwat



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No..... of 20

1508

TB
19

Jamil ur Rahman

Appellant/Petitioner

Versus

P.P.O. K.P. Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner

Shahid Ahmad Khan
Advocate High Court
at Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 25/8/2021 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 Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No.

7B

Appeal No. 1508 of 20 19

Jamil ut Rahman

Appellant/Petitioner

Versus

P.P.O. K.P.K. Pesh:

Respondent

Respondent No. J

Notice to: —

Pravind Pasie officer, Govt. of K.P.K.
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 25/8/2021 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.....

Day of.....20

August

21

6/11

at Camp Court Suat

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.

1B

Appeal No. 1508 of 20 19

Famil M. Ramras Appellant/Petitioner

Versus

P.P.O. 16/11 Pesh. Respondent

Respondent No. 2

Notice to: -

Regional Police officer Malakand R-111,
at Saichu 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 *on 25/8/2021 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.....

Day of.....20

August
at Camp Court Swat

6th

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

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

"B"

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

No.

703

Appeal No. 1508 of 20 19

Jamil ur Rahman Appellant/Petitioner
Versus

P.P.O. 15711 Pesh. Respondent

Respondent No. 3

Notice to: — Distt. Police Officer 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 ^{25/8/2019} 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.....

Day of.....20

August

21

at Camp Court Swat

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.

7E

Appeal No. 1508 of 2019

Jamilur Rahman Appellant/Petitioner

Versus

PPO K.P.T. Pesh. Respondent

Respondent No. 67

Notice to: - SHO, Halim Khan PS, Madyan

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 25/8/2021 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 6th.....

Day of August 2021.

at Camp Court Swat

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

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

“B”

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

No.

TB

Appeal No.....1508..... of 2019

.....Jamil ur Rama..... Appellant/Petitioner

Versus

.....P.P.O. M.P.K. Pesh...... Respondent

Respondent No.....5.....

Notice to: —

Constable Sadullah Jan, 3535/SPF
Posted at P.S. Madyan

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.....25/8/2021.....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.....6/8/21.....

Day of.....August.....2021

at Camp Court Swat

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.

TR

Appeal No. 1508 of 2019.

Jamil ur Rahman Appellant/Petitioner

Versus

P.P.O. K.P.K. Peshi Respondent

Respondent No. 6

Notice to: —

Constable Hayat Ali, 303/R Posted
at P.S. Madyan

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 25/8/19 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 6/11.....

Day of August 2019

at Camp Court Swat

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

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

"B"

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

No.

Appeal No. 1508 of 2019Jamil ur Rahman Appellant/Petitioner

Versus

P.P.O. 14 P.H.C. Peshawar RespondentRespondent No. 7

Notice to: —

Mubarak Ali, alias Kaka G/O M. Rahman
R/O Gharai Kalay Madayan Distt. 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 *on 25/8/2021 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. 2021

Given under my hand and the seal of this Court, at Peshawar this 6th

Day of August 2021

at Camp Court Swat

[Signature]
 Registrar,

Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"A"

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

No. _____

TB Swat

APPEAL No. *1508* of 20 *19*

Jamil ur Rehman

Appellant/Petitioner

Versus

PPO Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner

*Jamil ur Rehman Constable
No 350 Posted at Police
line Swat*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *9-6-22* at *8:00 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 emp court
Swat*

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

"A"

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

No. *Ray*

TB Swat

APPEAL No. *1502* of 20 *14*

Famit ur Rehman

Appellant/Petitioner

Versus

PPO Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Shabir Ahmad Khan
(Advocate)

Office Hamza Law Chamber Dabai Plaza
near Azad Medical Company Dakhana Road

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

on *7/6/20* at *8:00 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
Swat

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

