


Service Appeal No. 328/2019

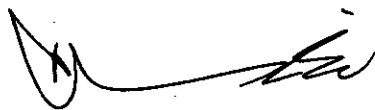
16<sup>th</sup> Nov, 2022

1. Learned counsel for the appellant. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

02. Learned counsel for the appellant was very fair to submit that the impugned order was passed in compliance with the directions of the august Supreme Court of Pakistan and Review Petition is pending before the august Supreme Court of Pakistan to get the findings reviewed. He submitted that the appellant would get a cause of action when the judgment of the august Supreme Court of Pakistan is reviewed. He, at present, does not press this appeal and seeks permission to file appeal in case the judgment of the august Supreme Court is reviewed and as he would get a cause of action thereafter. Disposed of accordingly. Consign.

03. *Pronounced in open court at Abbottabad and given under my hand and seal of the Tribunal on this 15<sup>th</sup> day of November, 2022.*

  
(Salah Ud Din)  
Member(Judicial)

  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

DFR

16<sup>th</sup> Nov, 2022

1. Learned counsel for the appellant. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

02. Learned counsel for the appellant was very fair to submit that the impugned order was passed in compliance with the directions of the august Supreme Court of Pakistan and Review Petition is pending before the august Supreme Court of Pakistan to get the findings reviewed. He submitted that the appellant would get a cause of action when the judgment of the august Supreme Court of Pakistan is reviewed. He, at present, does not press this appeal and seeks permission to file appeal in case the judgment of the august Supreme Court is reviewed and, he <sup>as</sup> ~~get~~ <sup>will get a</sup> cause of action thereafter. Disposed of accordingly. Consign.

03. *Pronounced in open court at Abbottabad and given under my hand and seal of the Tribunal on this 15<sup>th</sup> day of November, 2022.*

(Salah Ud Din)  
Member(Judicial)

(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

15<sup>th</sup> Oct 2022 Nov 2022 None None Filed to counsel for the appellant present. Mr.

Asif Muhammad Adeel Butt Addl. Magistrate for respondents

respondent present. Camp Court Abbottabad

Chairman (Kalim Arshad Khan) Member (Judicial) Called over for the court but seeks

nobody turned up on behalf of the appellant. In view of the adjournment as learned counsel for the appellant is not

above, the instant appeal is dismissed in default. Consistent available for today. Last chance is given to the appellant

to ensure presence of his counsel and to argue the case on the next date falling within the case will be decided on

under order of the camp court Abbottabad. To come up for arguments on 14.12.2022 before D.B at

decided on the available record without the arguments. for arguments on 18.12.2022 before D.B at principal seat

case on the next date falling which the case will be Peshawar.

(Salah Ud Din) (Salah Ud Din) today. Last chance is given to the appellant to argue the

his learned counsel the appellant is not available for Appellant seeks adjournment on the ground that


(Salah Ud Din) Adeel Butt, Appellants present. Appellant in person present. Mr. Muhammad


Chairman (Kalim Arshad Khan) Camp Court Swat Camp Court Abbottabad 5<sup>th</sup> Nov 2022

21<sup>st</sup> Sept 2022

Appellant alongwith his counsel present. Mr. Muhammad Jan, District Attorney for the respondents present.

P  
Mr. Arshad Khan Tanoli, Advocate submitted fresh Wakalatnama on behalf of the appellant and seeks adjournment on the ground that he has freshly been engaged in this appeal. On the previous date last chance was given to the appellant for arguments but today again adjournment was sought, therefore, adjournment granted subject to the cost of Rs. 5000/-. To come up for arguments on 16.11.2022 before D.B at camp court Abbottabad.


  
(Fareeha Paul)  
Member (Exeuctive)


  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

20.05.2022

None for the appellant present. Syed Naseer ud Din, Assistant Advocate General for respondents present.

Notices be issued to the appellant and his counsel. Adjourned. To come up for arguments before D.B on 20.07.2022 at camp court Abbottabad.


  
(Fareeha Paul)  
Member(E)


  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

20<sup>th</sup> July 2022

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney for respondents present.

Appellant seeks adjournment on the ground that his counsel is not available today. Last opportunity is granted to the appellant for arguments. To come up for arguments on 21.07.2022 before D.B at camp court Abbottabad.

  
(Salah Ud Din)  
Member (Judicial)

  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

24.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 13.05.2022 for the same as before.

  
Reader

13.05 2022

Junior to counsel for the appellant present. Mr. Naseer-ud-din Shah, Assistant Advocate General alongwith Mr. Gulzad SI for the respondents present.

Reply/comments on behalf of respondents submitted which are placed on file. To come up for arguments before the D.B on 20.05.2022 at Camp Court, Abbottabad.

  
(Kalim Arshad Khan)  
Chairman

27.10.2021

Counsel for the appellant present. Preliminary arguments have been heard. Memorandum of appeal and the copies of record annexed there with has been perused.

The factual account as have emerged in view of the preliminary arguments, the Government of Khyber Pakhtunkhwa up-graded the post of Foot Constable (BS-05) among others alongwith incumbency and it was provided in the said order that post shall automatically stand downgraded as and when vacated by the present incumbent. Nomenclature of the up-graded post was proposed as Head Constable (BS-7). The said notification was acted upon in respect of the incumbent covered under the impugned order dated 23.04.2012. However, the order implementing the personal up-gradation of the appellant alongwith others was withdrawn vide order dated 08.12.2016 treating the up-gradation as one step out of turn promotion. The reason for withdrawal of the said promotion was given as the judgment of the august Supreme Court of Pakistan and orders of the IGP Khyber Pakhtunkhwa. There is an arguable point in view of the said factual position whether the personal up-gradation of the post can be equated with out-of-turn promotion to bring the same within ambit of the impact of judgment of august Supreme Court of Pakistan about annulment of the shoulder and out of turn promotion. This appeal is admitted for regular hearing subject to all just legal and factual objections in view of the aforementioned arguable points. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 24.02.2022 before the D.B.

  
Chairman

03.06.2021

Counsel for the petitioner and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Instant application is for restoration of appeal No. 328/2019 dismissed for non-prosecution on 21.11.2019. Learned counsel for the petitioner states that the appellant/petitioner hails from District Chitral and could not reach in time and that the absence was not willful.

In view of the above, application is allowed and instant appeal is restored to its original number. Be fixed for preliminary hearing at Peshawar on 09.09.2021 before S.B.

  
Chairman

09.09.2021

None for the appellant present.

Due to general strike of the legal fraternity, the case is adjourned. Notice be issued to the appellant and his counsel. To come up for preliminary hearing before the S.B on 27.10.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

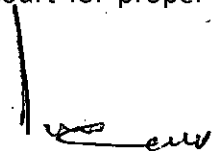





Form-A

FORM OF ORDER SHEET

Court of 130/20

Restoration Application No. ~~130/20~~ /2020

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	31.08.2020	<p>The application for restoration of appeal No.328/2019 submitted by Mr. Zulfiqar Ahmad Advocate, may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	<p></p> <p>transferred from A. Abad to Peshawar</p>	<p>This restoration application is entrusted to touring S. Bench at A.Abad to be put up there on <u>18-01-2021</u></p> <p style="text-align: right;">CHAIRMAN </p>
15.02.2021		<p>The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 03.06.2021.</p> <p style="text-align: right;"> Reader</p>

21.10.2019

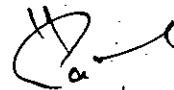
Appellant present in person. Counsel for the appellant is not present due to general strike of the bar. Appellant requested for adjournment. Adjourn. To come up for preliminary hearing on 23.10.2019 at Camp Court, Abbottabad.



Member  
Camp court, A/Abad

23.10.2019

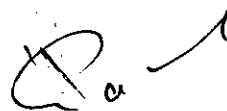
Counsel for the appellant present. Learned counsel for the appellant requested for adjournment to furnish additional documents in support of present service appeal. Adjourn. To come up for preliminary hearing on 21.11.2019 before S.B at camp Court, Abbottabad.



Member  
Camp court, A/Abad

21.11.2019

Appellant absent. Learned counsel for the appellant absent. Case called but neither the appellant nor his counsel turned up. Consequently the present service appeal is hereby dismissed in default. No order as to costs. File be consigned to the record room.



(Muhammad Hamid Mughal)  
Member  
Camp Court, A/Abad

ANNOUNCED.

21.11.2019

18.06.2019

Counsel for the appellant present.

In order to cover/explain the delay involve in the case in hand learned counsel requests for time to further prepare the brief and lay hand on judgments of Superior Court on the point.

Adjourned to 10.07.2019 for preliminary hearing before S.B at camp court, Abbottabad.



Chairman  
Camp court, A/Abad

10.07.2019

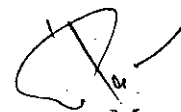
None present on behalf of the appellant. Notice be issued to appellant and his counsel for attendance and preliminary hearing for 19.08.2019 before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

19.08.2019

Appellant with counsel present. Learned counsel for the appellant seeks adjournment to furnish additional documents in support of present service appeal. Adjourn. To come up for preliminary hearing on 21.10.2019 before S.B at Camp Court, Abbottabad.

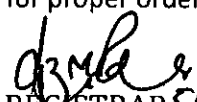
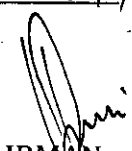



Member  
Camp Court A/Abad

Form- A  
FORM OF ORDER SHEET

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

Case No. 328/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/03/2019	<p>The appeal of Mr. Javed Ahmad received today by post Mr. through Zulfiqar Ahmad Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 5/3/19</p>
2-	13-3-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>24-5-2019</u></p> <p> CHAIRMAN</p>
24.05.2019		<p>Counsel for the appellatant present and requested for adjournment. Adjourned to 18.06.2019 for preliminary hearing before S.B at Camp Court Abbottabad.</p> <p> (Muhammad Amin Khan Kundi) Member Camp Court Abbottabad</p>

The appeal of Mr. Javed Ahmad son of Nazoor Khan r/o Behtoli Gol, P.O Shaghoor District Chitral received today by i.e. on 14.02.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Affidavit may be got attested by the Oath Commissioner.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be annexed serial was as mentioned in the memo of appeal.
- 4- Copy of notification dated 23.4.2012 mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.
- 5- Departmental appeal having no date be dated.
- 6- Page no. 8 to 12, 18 & 19 of the appeal are illegible which may be replaced by legible/better one.
- 7- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

*only 6 sets*  
No. 276 /S.T,

Dt. 15/2 /2019

*15/2/19*  
REGISTRAR

SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Zulfiqar Ahmd Adv.  
High Court A. Abad.

*Sir,  
Compliance has been  
Carried Out. may please  
be proceed further legal action.  
Advocate Jyic  
Court 27/2/19*

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUN  
KHWA PESHAWAR

Service Appeal No- 328/2019

Javed Ahmed

VS

Secretary Govt. of KPK & Others

SERVICE APPEAL


INDEX

S. No.	Description	Annexure	Pages
1	Service Appeal with affidavit		1 To 7
2	Copy of notification/order dated 02/05/2012	"A"	8 To 15
3	Copy of the order of promotion dated 31/05/2012	"B"	16 To 17
4	Copy of impugned order dated 08/12/2016	"C"	18 To 20
5	Copy of application of appellant	"D"	21 To 22
6	Copy of letter issued is bearing No. 4199	"E"	23
7	Copy of letter bearing No. 7481	"F"	24
8	Wakalatnama	"G"	25

..... APPELLANT

Through

Dated 15/01/2019

  
~~(ZULFIQAR AHMED)~~  
Advocate High Court  
Abbottabad

BEFORE THE KHYBER PUKHTUNKHWA SERVICES

①

TRIBUNAL PESHAWAR

*Appeal no. 328/2019*

Javed Ahmed S/O Nazoor Khan R/O Behtoli Gol, P.O Shaghoor,  
Tehsil & District Chitral presently posted as constable # 1370 of Pukhtunkhwa  
CTD, Hazara Region, Abbottabad. Service Tribunal

.....PETITIONER Petition No. 192

V/S

Dated 14-2-19

1. SECRETARY GOVERNMENT OF KPK HOME AND TAs DEPARTMENT PESHAWAR.
2. ADDITIONAL INSPECTOR GENERAL OF POLICE CTD, KPK PESHAWAR.
3. DEPUTY INSPECTER GENARAL OF POLICE CTD, KPK, PESHAWAR.
4. SUPERINTENDENT OF POLICE CTD HAZARA REGION AT ABBOTTABAD.
5. DISTRICT POLICE OFFICER SWAT.

.....RESPONDENTS

**Filed to-day** =====

*14/2/19*  
**Registrar**

SERVICE APPEAL

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT AGAINST THE ORDER OF RESPONDENT # 2 PASSED VIDE OB#343/CTD DATED 8-12-2016 WHEREBY ONE STEP PROMOTION OF THE APPELLANT WAS WITHDRAWN/ CANCELLED AND NAME BROUGHT TO THE ORIGINAL SUBSTANTIVE RANK IS AGAINST LAW FACTS AND CIRCUMSTANCES OF THE CASE AND THE IMPUGNED ORDER NEEDS TO BE REVERSED UPHOLDING THE ORDER OF THE ONE STEP PROMOTION OF THE APPELLANT.

PRAAYER:

ON ACCEPNTANCE OF THE APPEAL THE ORDER OF RESPONDANT #2 MAY BE DECLARED ILLEGAL, NULL AND VOID AND THE APPELANT RESTORED TO HIS ORIGIONAL POSITION BY EXTENDING BACK BENEFITS.

Re-submitted to -day  
and filed.

*5/3/19*  
**Registrar**

Respectfully Sheweth,

1. That respondent # 1 through an order #SO(Police)HD/5-8/2012/09/KC referring KPK finance department notification #FD/SO(FR)/7-8/2010/Vol-ii dated 23-04-2012 was pleased to upgrade 209 posts of leftover personnel with immediate effects subject to the condition that in future no such case/claim of police officers of Swat region will be honored. The order contains the names of many inspectors including Sub inspectors and other categories of the Force were included in the list. (Copy of the notification / order No. SO (Police) HD/5-8/2012/09/KC is attached as annexure "A").
2. That as the appellant and his colleagues Zakir Hussain and Ali Ahmed were not included in the basic one step promotion list therefore their names were later on considered for one step promotion as a result they were also promoted vide notification No. SO (Police HD/5-8/2012/09/KC dated 02/05/2012.
3. That thereafter the DPO Swat was kind enough to order the appellant and others of district Swat who were on active duty in **operation period** were promoted one step promotion to the rank of Head Constables (BPS-7) vide his OB # 108 DATED 31-05-2012. The list of the constables so promoted were 81 in number. (Copy of the order of promotion during the operation period in Swat is attached as annexure "B").
4. That on 08-12-2016 vide OB # 343 the respondent # 2 of CTD KPK Peshawar reverted the appellant and 3 others by withdrawing and cancelling the one step



promotion taking shelter of the directions of honorable Supreme Court of Pakistan and the order of worthy IGP KPK, Peshawar Memo dated 10-10-2016. The order was issued vide office letter No. 13222-30/EC/CTD dated 08/12/2016, which was kept behind for unknown reasons till 08/01/2018 when it was received at CTD, Chitral vide No. 12. (Copy of the impugned order is as annexure "C").

5. That an application was moved through proper channel challenging the order of reversion stating there in that he was appointed in the year 2006 and remained performing his duties even during the Swat Operation and as a recognition of the services, in the year 2008 when the operation was ended, the personnel's and the officers who remained on duty during those hard days were given one step promotion as a special case and was transferred to District Chitral. Thereafter the appellant was transferred to Elite force CTD. It was also mentioned in the application that the impugned reversion brought the appellant back to the rank of constable while the other promotes are still enjoying the posts of Head Constables in Elite force and 6 other Districts of Malakand Region. (Copy of application is attached as annexure "D").
6. That the respondent # 3 also recommended the name of the petitioner and one constable # 837 Rehman Said, to the IGP, KPK, Peshawar that both the constables may be granted one step promotion in the unit as their colleagues were not reverted also that they may be repatriated to their parent district to promote as Head Constables. (Copy of letter issued is bearing No. 4199 dated 23/04/2018 is attached as annexure "E").

- 4
7. That in the mean while on 03-09-2018 the respondent# 4 was addressed by the Regional Police officer Malakand asking for comments from respondent # 3 as well as the Regional Police Officer, Hazara, Abbottabad wherein the facts were mentioned and he advised to seek necessary comments from DIG Police CTD, KPK, Peshawar. (Copy of the letter bearing No. 7481 dated 03/09/2018 is attached as annexure "F").
  8. That since then from 03-09-2018 till now no action from any respondents is taken towards the restoration of the rank of the appellant nor any information is conveyed about the fate of his case. Therefore the inaction on the part of respondents clearly indicates their malafide, unjustified and illegal reversion order and inaction on the applications of the appellant is impugned inter area on the following grounds:-

#### GROUNDS.

- a) That the order of reversion of the appellant by respondents is against law, facts and circumstances of the case. Hence not tenable under the eyes of law.
- b) That the impugned order of reversion of the rank of appellant is passed as a result of misconception as the judgment of Supreme court of Pakistan does not relate to the case of appellant who was promoted one step higher rank as a special case in recognition of services during the Swat operation and was promoted through a gazette notification issued by the Home and TAs Department Peshawar.

5

c) That the respondents were not justified in wrong interpretation of the judgment of Supreme court of Pakistan that related to the out of turn promotion while the case of appellant was a special case of one step promotion for the personnel's who rendered their services during Swat operation. More over the borrower department where the appellant was on deputation were not supposed to take the action of reversion of the appellant. Therefore the orders so passed needs to be reversed.

d) That even the hierarchy of the Police Department, analyzing the rights affected due to impugned orders, have recommended for positive steps like one step promotion to be given to the appellant.

e) That the correspondence has now ended with no action of reversal of the impugned orders. Therefore, the appellant was obliged to knock the door of this honorable tribunal for redressal of his grievances as due to the impugned order of his reversion and a cold response by the Department has resulted in violation of basic rights of the appellant as he was discriminated departmentally like others promoted officers are even still enjoying their special promotion or retired after getting even further promotions as well.

f) The law of consistency also demands that a similar placed case is before this honorable court if it is compared to the other officers who are promoted along with the appellant and they have not been reverted by their authorities.

g) That other submissions will be argued at the time of arguments.

PRAYER

In view of the above submissions it is very most humbly prayed that on acceptance of the appeal, the impugned orders of reversion of the appellant may very kindly be set aside and he be allowed on promotion from the date of his reversion with all back benefits allowed under the law to him in order to meet the ends of justice.

Javed Ahmed  
*Javed*  
.....Petitioner

Through

~~*[Signature]*~~  
(Zulfiqar Ahmed Advocate)  
High court Abbottabad.

Date: 15-01-2019

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUN KHWA  
PESHAWAR

Javed Ahmed      VERSUS      Secretary Govt. of KPK & Others.

SERVICE APPEAL

AFFIDAVIT

I, Javed Ahmed S/O Nazoor Khan R/O Behtoli Gol, P.O Shaghoor, Tehsil & District Chitral presently posted as constable # 1370.CTD, Hazara region, Abbottabad, do hereby solemnly affirm and declare on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein. No such appeal is pending an any other court.

*Javed Ahmed*  
Javed Ahmed

...DEPONENT

Dated 15/01/2019

Identified by: -

*Zulfiqar Ahmad*  
(ZULFIQAR AHMAD)  
Advocate High Court  
Abbottabad



**ORDER**  
 No. SO (Police) 11D/5-8/2012/09/KC.

The Government of Khyber Pakhtunkhwa Finance Department via No. FD/SO(FR)/7-8/2010/Vol-II, dated 23.04.2012 is pleased to up grade 209-posts of left of personnel, with immediate effect, subject to the condition that in future no such case/chain Police officials/officers of Swat Region will be lienoted. The post shall automatically stand de as and when vacated by the present incumbents. The detail is as under:-

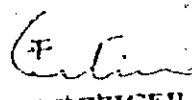
S/II	Existing Nomenclature & D.P.S.	Proposed Nomenclature & D.P.S.	DPO Swat/ SP FRP Swat	DDO Codes
1.	Inspector BS-16	D.S.P BS-17	DPO/Swat	SW4042
2.	Sub-Inspector BS-14	Inspector BS-16	DPO/Swat	SW4042
3.	Sub-Inspector BS-14	Inspector BS-16	SP/FRP Swat	SW4046
4.	Sub-Inspector/PC BS-14	Inspector/PC BS-16	SP/FRP Swat	SW4046
5.	Head Constable BS-07	ASI BS-09	SP/FRP Swat	SW4046
6.	Head Constable BS-07	ASI BS-09	DPO/Swat	SW4042
7.	Foot Constable BS-05	II. Constable BS-07	DPO/Swat	SW4042
8.	Foot Constable BS-05	II. Constable BS-07	SP/FRP Swat	SW4046
9.	Lady Foot Constable (LFC) BS-05	Lady Head Constable (LHC) BS-07	DPO/Swat	SW4042
10.	Senior Clerk (SC) BS-09	Assistant Grade Clerk BS-14	DPO/Swat	SW4042
11.	Senior Clerk (SC) BS-09	Assistant Grade Clerk BS-14	SP FRP Swat	SW4046
12.	Asstt. G/Clerk BS-14	Office Supjt. BS-16	DPO/Swat	SW4042
13.	J/Clerk BS-07	S/Clerk BS-09	DPO/Swat	SW4042
14.	J/Clerk BS-07	S/Clerk BS-09	SP FRP Swat	SW4046
15.	Daftari BS-05	J/Clerk BS-07	DPO/Swat	SW4042
16.	Najib Qasid BS-02	Qasid BS-03	DPO/Swat	SW4042
		<b>Total:-</b>		

**SECRETARY TO**  
**GOVT. OF KHYBER PAKHTUNKHWA**  
**HOME & TA'S DEPARTMENT, PESHAWAR**

No. FD/SO (FR)/7-8/2010/Vol II,

Dated 02/05/12

- Copy of above is forwarded for information and necessary action to the:-
1. The Accountant General Khyber Pakhtunkhwa Peshawar.
  2. The District Accounts Officer, Swat.

  
**SECTION OFFICER**  
**FINANCE DEPARTMENT**  
**PESHAWAR**

No. SO (Police) 11D/5-8/2012/09/KC.

Dated 02/05/2012.

- Copy of above is forwarded for information and necessary action to:-
1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
  2. The Section Officer (FR) Government of Khyber Pakhtunkhwa Finance Department Peshawar.
  3. The Budget Officer-III Government of Khyber Pakhtunkhwa Finance Department Peshawar.

**SECTION**  
**HOME &**

OFFICE OF THE PROVINCIAL POLICE OFFICER,  
KHYBER PAKHTUNKHWA, PESHAWAR.

No. 4499-4506/1A-3, Dated Peshawar, the 4/10/2012

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

1. The Deputy Inspector General of Police Malakand Region Baidi Sharif, Swat w/r office letter No. 1096/B, dated 21.02.2012 addressed to Home Department with a copy endorsed to this office.
2. The Comandant Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar.
3. The Assistant Inspector General of Police Establishment CPO, Peshawar.
4. The District Police Officer, Swat.
5. The Superintendent of Police, Frontier Reserve Police Malakand Region Swat.
6. The Registrar CPO Peshawar.

DAVID KHAN  
Budget Officer  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

8A

**BETTER COPY**

GOVT: OF KHYBER PAKHTUNKHWA  
HOME & TAs DEPARTMENT PESHAWAR

**ORDER:**

No. So (Police) HD/5-8/2012/09/KC.

The Government of Khyber Pakhtunkhwa finance Department vide No. FD/SO (FR)/7-8/2010/Vol-II, dated 23.04.2012 is pleased to up grade 209-posts of left out personnel, with immediate effect, subject to the condition that in future no such case/claim Police officials/officers of Swat Region will be honoured. The post shall automatically stand do as and when vacated by the present incumbents. The detail is as under:-

S#	Existing Nomenclature & BPS	Proposed Nomenclature & BPS	DPO Swat/SP FRP Swat	DDO Codes
1.	Inspector DS-16	D.S.P DS-17	DPO/Swat	Sw4042
2.	Sub-Inspector BS-14	Inspector BS-16	DPO/Swat	SW4042
3.	Sub- Inspector BS-14	Inspector BS-16	SP/FRP Swat	SW4046
4.	Sub-Inspector BS-14	Inspector/PC BS-16	SP/FRP Swat	SW4046
5.	Head Constable BS-07	ASI BS-09	SP/FRP Swat	SW4046
6.	Head Constable BS-07	ASI BS-09	DPO/Swat	SW4042
7.	Foot Constable BS-05	H. Constable BS-07	DPO/Swat	SW4042
8.	Foot Constable BS-05	H. Constable BS-07	SP/FRP, Swat	SW4042
9.	Lady Foot Constable (LFC) BS-05	Lady Head Constable (LHC) BS-07	DPO/Swat	SW4042
10.	Senior Clerk (SC) BS-09	Assistant Grade Clerk BS-14	DPO/Swat	SW4042
11.	Senior Clerk (SC) BS-09	Assistant Grade Clerk BS-11	SP FRP Swat	SW4046
12.	Asstt: G/Clerk BS-14	Office Suppdt: BS-16	DPO/Swat	SW4042
13.	J/Clerk BS-07	S/Clerk BS-09	DPO/Swat	SW4042
14.	J/Clerk BS-07	S/Clerk BS-09	SP FRP Swat	SW4046
15.	Daftari BS-05	J/Clerk BS-07	DPO/Swat	SW4042
16.	Naib Qasid BS-02	Qasid BS-03	DPO/Swat	SW4042

SECRETARY TO  
GOVT: OF KHYBER PAKHTUNKHWA  
HOME & TA's DEPARTMENT, PESHAWAR.

No. FD/SO (FR)/7-8/2010/Vol II,

Dated 02/02/2012

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

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. The District Accounts Officer, Swat.

SECTION OFFICER  
FINANCE DEPARTMENT  
PESHAWAR.

No. SO (Police) HD/5-8/2012/09/KC

Dated 02/05/2012

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

1. The provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The section Officer(FR) Government of Khyber Pakhtunkhwa Finance Department.
3. The Budget Officer III Government of Khyber Pakhtunkhwa Finance Department , Peshawar.

SECTION OFFICER  
HOME & TA S DEPARTMENT  
PESHAWAR.



9A

**OFFICE OF THE PROVINCIAL POLICE OFFICER**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

No. 4499-4506/A-3

Dated Peshawar the 4/05/2012

Copy of above is forwarded for information further necessary

action to:-

1. The Deputy Inspector General of Police Malakand Region Saidu Sharif, Swat w/r to his office letter No. 1096/E, dated 21.02.2012 addressed to Home department with a copy endorsed to this office.
2. The Commandant Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar.
3. The Assistant Inspector General of Police Establishment CPO, Peshawar.
4. The District Police Officer, Swat.
5. The Superintendent of Police, Frontier Reserve Police Malakand Region Swat.
6. The Registrar CPO, Peshawar

(JAVED KHAN)

Budget Officer

For Provincial Police Officer.

Khyber Pakhtunkhwa, Peshawar

OF POLICE PERSONNEL OF DISTRICT SWAT WHO WERE  
ABSENT DURING INSURGENCE: PERIOD FROM 20-04-2009  
TO 31-5-2009  
THEY ARE RECOMMENDED BY PROMOTION COMMITTEE.

S/No	Names & Rank	Present BPS	On one Step Promotion BPS
1.	S/PC Adalat Khan FRP	11	16
2.	HC Mukarram 958		9
3.	HC Liaqat Ali 122		9
4.	HC Khalid 44		9
5.	HC Rafiq Zaman 892		9
6.	HC Bakht Belind 1150		9
7.	HC Afzal Shah 385		7
8.	HC Saieh Muhammad 1052		7
9.	FC Imran 1794		7
10.	FC Ikram Ullah 1314		7
11.	FC Asghar Khan 372		7
12.	FC Shah Raza 118B		7
13.	FC Basfir Ahmad 367		7
14.	FC Zahoor 151		7
15.	FC Khurshid Iqbal 251		7
16.	FC Akbar Hussain 748		7
17.	FC Tahir Khan 403		7
18.	FC Sajid Ali 1715		7
19.	FC Tahir Shahi 377		7
20.	FC Muhammad Diyyar 1549		7
21.	FC Akbar Ali 1368		7
22.	FC Fazali Ghaffar 909		7
23.	FC Muhammad Zaman 805		7
24.	FC Bahrul hayat 1324		7
25.	FC Murad 1183		7
26.	FC Fazal Karim 812		7
27.	FC Abzar 1328		7
28.	FC Muhammad Afzal 054		7
29.	FC Anveer Ul Haq 871		7
30.	FC Mullan 882		7
31.	FC Sami Rehman 1789		7
32.	FC Aftab Alam 1828		7
33.	FC Anwer Zaman 1042		7
34.	FC Abid Ali 1511		7
35.	FC Mian Gul Bad 1507		7
36.	FC Namir Gul 417		7
37.	FC Kiram Shah 148		7

Officer Present

Better Copy  
==

(11)

**LIST OF POLICE PERSONNEL OF DISTRICT SWAT WHO WERE  
PRESENT DURING IN INSURGENCE PERIOD FROM 20-04-2009  
TO 31-5-2009**

**THEY ARE RECOMMENDED BY PROMOTION COMMITTEE**

S/NO	Names & Rank	Present BPS	On one Step Promotion BPS
1.	SI/PC Adalat Khan FRP	11	16
2.	HC Mukarram 958	7	9
3.	HC Liaqat Ali 122	7	9
4.	HC Khalid 44	7	9
5.	HC Rafiq Zaman 892	7	9
6.	HC Bakht Belind 1150	7	9
7.	HC Afzal Shah 385	7	9
8.	HC Saleh Muhammad 1052	7	9
9.	FC Imran 1794	5	7
10.	FC Ikram Ullah 1314	5	7
11.	FC Asghar Khan 372	5	7
12.	FC Shah Raza 1188	5	7
13.	FC Bashir Ahmad 367	5	7
14.	FC Zahoor 151	5	7
15.	FC Khurshid Iqbal 251	5	7
16.	FC Akbar Hussain 748	5	7
17.	FC Tahir Khan 403	5	7
18.	FC Sajid Ali 1715	5	7
19.	FC Tahir Shah 377	5	7
20.	FC Muhammad Diyyar 1549	5	7
21.	FC Akbar Ali 1368	5	7
22.	FC Fazali Ghaffar 909	5	7
23.	FC Muhammad Zaman 895	5	7
24.	FC Bahrul Hayal 1324	5	7
25.	FC Murad 1183	5	7
26.	FC Fazal Kariro 812	5	7
27.	FC Abzar 1328	5	7
28.	FC Muhammad Afzal 854	5	7
29.	FC Tanveer Ul Haq 871	5	7
30.	FC Mutlan 882	5	7
31.	FC Sami Rehman 1789	5	7
32.	FC Aftab Alam 1848	5	7
33.	FC Anwar Zaman 1522	5	7
34.	FC Abid Ali 15/FR	5	7
35.	FC Mian Gul Bad Shah 975	5	7
36.	FC Namir Gul 17	5	7
37.	FC Kiramat Shah 1420	5	7



44.	FC Shoukat Ali 1560	5	7
45.	FC Anwer Zeb 4392	5	7
46.	FC Aziz Ullah 1732	5	7
47.	FC Akhun Zada 4504	5	7
48.	FC Gul Namroze 4451	5	7
49.	FC Sultan Zeb 4666	5	7
50.	FC Nawab Khan 4654	5	7
51.	FC Muhammad Hayat 4488	5	7
52.	FC Rooh Ul Amin 1363	5	7
53.	FC Mohibullah 4440	5	7
54.	FC Manzoor Akbar 4646	5	7
55.	FC Jehanzeb 4643	5	7
56.	FC Ihsan Ali	5	7
57.	FC Muhammad Ishaq 4735	5	7
58.	FC Zahoor Ahmad 4722	5	7
59.	FC Ijaz Hussain 4953	5	7
60.	FC Alam Zeb 4781	5	7
61.	FC Said Bad Shah 4918	5	7
62.	FC Ali Rehman 4919	5	7
63.	FC Zahoor Ahmad 4926	5	7
64.	FC Murad Ullah 4927	5	7
65.	FC Riaz Khan 4927	5	7
66.	FC Taj Noor Khan 4936	5	7
67.	FC Sher Zada 4933	5	7
68.	FC Saif Ullah 4938	5	7
69.	FC Khan Wahid 4940	5	7
70.	FC Hamid Shah 4943	5	7
71.	FC Farman Ullah 4932	5	7
72.	FC Ihsan Ullah 4941	5	7
73.	FC Nasir Ahmad 5444	5	7
74.	FC Wajid Gul 5112	5	7
75.	FC Asif 5334	5	7
76.	FC Tariq 5128	5	7
77.	S/C Yar Muhammad Khan	9	14
78.	J/C Mian Said Wahid	7	9

LIST OF OFFICERS RECOMMENDED FOR PROMOTION TO THE ORGANIZATION

Sl. No.	Names & Rank	Present BPS	On one Step Promotion BPS
1	SI Rehmat Ali 362 M	11	16
2	SI/PC Bad Shah Khan	11	15
3	SI/PC Ghulam Ahad Khan	11	16
4	SI/PC Abdul Hameed	11	16
5	SI/PC Mohabat Khan	11	16
6	SI/PC Fazal Qadeer Khan	11	16
7	SI/PC Amim Khan	11	16
8	SI/PC Naik Hussain	11	16
9	SI/PC Munjra Khan	11	9
10	HC Lal Zada 4299	11	9
11	HC Shair Hussain 5009	11	9
12	HC Shah Zada 4227	11	9
13	HC Jehan Tab 867	11	9
14	HC Mukamal Shah 5017	11	9
15	HC Yosuf Khan 4449	11	9
16	HC Aziz Ur rehman 4493	11	9
17	HC Bad,shah Rehman 4403	11	9
18	HC Mian Gul Bad Shah 4272	11	9
19	HC Wahid Khan 2079	11	9
20	HC Muhammad Zahir 4292	11	9
21	HC Muhammad Gul 4494	11	9
22	HC Khalid Khan 4491	11	9
23	HC Habib Ur Rehman 4406	11	9
24	HC Noor Rehman 4432	11	9
25	HC Lal Muhammad 4536/3603	11	9
26	HC Fazal Muhammad 4450	11	9
27	HC Saad Ud Din 4405	11	9
28	HC Abdul Hamid 4997	11	9
29	HC Mukamel Khan 4986	11	9
30	HC Behram Khan 5011	11	9
31	HC Gul Muhammad 5014	11	9
32	HC Islam Khan 5013	11	9
33	HC Pervez 5105	11	7
34	FC Muhammad Zahir 2345	5	7
35	FC Sher Alam Khan 4808	5	7
36	FC Farhad Ali 4241	5	7
37	FC Aziz Ul Hayat 4505	5	7
38	FC Liaqat Ali 4687	5	7
39	FC Muhammad Ali 4470	5	7
40	FC Ajab Khan 4281	5	7
41	FC Shahid Ali 4249	5	7
42	FC Rashid Ali 4588	5	7
43	FC Akbar Khan 4407	5	7

Section Officer (Personnel)  
District Police Officer

	Bahader Rehman, 127/RR		
	FC Abida, 1391		7
	FC Muhamma Ghanl, 292		7
	FC Dilbar 745		7
50	FC Raqibullah, 600		7
51	FC Nadar Khan, 1035		7
52	FC Said Farooq, 1138		7
53	FC Gulab Said, 141/RR		7
54	FC Alam Khan, 1464		7
55	FC Bakhti Rehman, 49./RR		7
56	FC Maheuddin, 166/RR		7
57	FC Zakir Hussain 46/RR		7
58	FC Ali Ahmad, 173/RR		7
59	FC Mudhamand Shah, 214/RR		7
60	FC Muhammad Rehman, 076		7
61	FC Mohammad Ellahi, 162		7
62	FC Aziz Ullah 1050		7
63	FC Ali Zada, 200		7
64	FC Nisar Ahmad, 391		7
65	FC Javed Ahmad, 187/RR		7
66	FC Ali Akbar 532		7
67	FC Ikram Ullah, 1590		7
68	FC Jan Rashid, 1584		7
69	FC Saif Ullah 178		7
70	FC Bashir Ahmad, 367		7
71	FC Muhammad Gul, 1107		7
72	FC Sheraz 1174		7
73	FC Nawab Zada, 400		7
74	FC Said Ullah 176 Tele		7
75	FC Adalat Khan, 1133		7
76	FC Hikmat Shah, 1156		7
77	FC Sharif Khan, 1097		7
78	FC Najm ud din, 43./RR		7
79	FC Jan Hakim 123/Rr		7
80	FC Sajjad 80		7
81	FC Rafi Ullah, 1582/1201		7
82	FC Bakht Biland 1350		7
83	FC Bakhti Rehman, 835		7
84	FC Momin Khan, 1112		7
85	FC Younas, 1055		7
86	FC Sajjad 1211		7
87	FC Nawab Ali, 491		7
88	S/C Akbar Ali pay Officer	14	
89	Asstt Grad Clerk Moharrir	14	
90	Asstt Grade Clerk Am...	9	
91	S/C Miran Said Wahab		
92	J/C Shoukat Ali		
93	Daftry Riaz Ahriad		
94	N/Qasid Muhammad Ishtiaq		

Name & Rank	Present BPS	On one Stop Promotion BPS
Inspector Khaista Rehman	16	17
Inspector Muhammad Alam	16	17
Inspector Yosuf Ali	16	17
Inspector Amjad Ali	16	16
SI Muhamamd Hanif	14	16
SI Pir Zar Bad Shah	14	9
HC Wazir Bad Shah, 1283 ✓	7	9
HC Bakht Baidar, 326	7	9
HC Nazir Ahmad, 954	7	9
HC Zahir Shah, 329	7	9
HC Muhamrnad Rehman, 405 ✓	7	9
HC Abdullah, 283	7	9
HC Javed, 534	7	9
HC Fazal Wahab, 1046	7	9
HC Sher Alam, 1307	7	9
HC Muhammad Ali, 397	7	9
HC Inayat Ullah, 370	7	9
HC Usman Ali, 1284 ✓	7	9
HC Habib Ullah, 324	7	9
HC Sher Bahadar, 1186 ✓	7	9
HC Muhammad Saleem, 780 ✓	7	9
HC Ghus Rehman, 39	7	9
HC Muhamamd Yousaf, 845	7	9
HC Umar Hayat, 1722	7	9
HC Muhammed Aman, 1362	7	9
HC Muhammad Khan, 681	7	9
HC Fazal Rahim, 26/314 ✓	7	9
HC Yar Muhammad, 1308	7	9
HC Jehan Zeb, 19 ✓	7	9
HC Zamir Gul, 1017	7	9
HC Fazal Subhan, 1094	7	9
HC Bahadar Khan, 88	7	9
HC Behroz, 1278	7	7
HC Shujat Ali, 928 ✓	5	7
FC Ali Zeb, 157	5	7
FC Habib Khan, 29	5	7
FC Alam Gir, 495	5	7
FC Arshad Inbal, 1478	5	7
FC Fazal Karim, 812	5	7
FC Sarb Ali, 1083	5	7
FC Abdul Shakoor, 1241	5	7
FC Hidayat Ullah, 1488	5	7
FC Khan Nawab, 431	5	7
FC Habib Ur Rehman, 620	5	7
FC Sultani Room, 537	5	7



**B**

**ORDER**


In pursuance of Khyber Pakhtunkhwa, Peshawar Finance Department Letter No. FD/SO(FR)/7-8/2010/Vol-II, dated 23-04-2012 and Home & TA,s Department Notification No. SO (Police) HD/5-8/2012/09/KC, dated 02-05-2012, and C.P.O, Khyber Pakhtunkhwa, Peshawar Endst: No.4499-4506/A-3, dated 04-05-2012, the following Constables of this district Police on active duty in operation period are hereby promoted as one step promote HCs (BPS-7) with immediate effect, subject to the condition that in future no such case/claim of other police officials/officers of swat Region will be honored, the post shall automatically stand downgraded as and when vacated by the present incumbents.

S.No.	Name & No.
1.	Constable Ali Zeb No. 157-RR
2.	Constable Habib Khan No. 29-RR
3.	Constable Alamgir No. 1495
4.	Constable Arshad Iqbal No. 1478
5.	Constable Fazal Karim No. 812
6.	Constable Sarb Ali No. 1083
7.	Constable Abdul Shakoor No. 1241
8.	Constable Hidayat Ullah No. 588
9.	Constable Khan Nawab No. 431
10.	Constable Habib Ur Rehman No. 628
11.	Constable Sultani Room No. 537
12.	Constable Bahader Rehman No. 127/RR
13.	Lady Constable Abida No. 1391
14.	Constable Muhammad Ghani No. 292
15.	Constable Dilbar No. 745
16.	Constable Raqib Ullah No. 600/73-RR
17.	Constable Nadar Khan No. 1035
18.	Constable Said Farooq No. 1138
19.	Constable Gulab Said No. 141/RR
20.	Constable Alam Khan No. 1464
21.	Constable Bakhti Rahman No. 49/RR
22.	Constable Maheuddin No. 166/RR
23.	Constable Zakir Hussain No. 46/RR ✓
24.	Constable Ali Ahmad No. 173/RR ✓
25.	Constable Muhammad Shah No. 214/RR
26.	Constable Muhammad Rehman No. 976
27.	Constable Mohammad Ellahi No. 162
28.	Constable Aziz Ullah No. 1050
29.	Constable Ali Zada No. 200
30.	Constable Nisar Ahmad No. 391
31.	Constable Javed Ahmad No. 187/RR ✓
32.	Constable Ali Akbar No. 532
33.	Constable Ikram Ullah No. 1590
34.	Constable Jan Rashid No. 1584
35.	Constable Saif Ullah No. 178
36.	Constable Bashir Ahmad No. 367
37.	Constable Muhammad Gul No. 1107
38.	Constable Nawab Zada No. 400
39.	Constable Said Ullah No. 176 Tele
40.	Constable Adalat Khan No. 1133
41.	Constable Hikmat Shah No. 1156
42.	Constable Sharif Khan No. 1097
43.	Constable Najm Ud Din No. 43/RR

S.No.	Name & No.
44.	Constable Jan Hakim No. 123/RR
45.	Constable Sajjad No. 80-RR
46.	Constable Rafi Ullah No. 1582/1201
47.	Constable Bakht Biland No. 1350
48.	Constable Bakhti Rehman No. 835
49.	Constable Momin Khan No. 1412
50.	Constable Younas No. 1055
51.	Constable Sajjad No. 1211
52.	Constable Nawab Ali No. 491
53.	Constable Imran No. 1794
54.	Constable Ikramullah No. 1314
55.	Constable Izhar Khan No. 372
56.	Constable Shah Raza No. 1188
57.	Constable Bashir Ahmad No. 367
58.	Constable Zahoor No. 151
59.	Constable Khurshaid Iqbal No. 251
60.	Constable Akbar Hussain No. 748
61.	Constable Tahir Khan No. 403
62.	Constable Sajid Ali No. 1715
63.	Constable Tahir Shah No. 377
64.	Constable Mohammad Diyar No. 1549
65.	Constable Akbar Ali No. 1368
66.	Constable Fazal Ghaffar No. 909
67.	Constable Mohammad Zaman No. 895
68.	Constable Bahrul Hayat No. 1324
69.	Constable Murad No. 1183
70.	Constable Fazal Karim No. 812
71.	Constable Abzar No. 328
72.	Constable Mohammad Afzal No. 854
73.	Constable Tanvir Ul Haq No. 871
74.	Constable Maitan No. 882
75.	Constable Saimi Rahman No. 1729
76.	Constable Aftab Alam No. 1843
77.	Constable Anwar Zaman No. 1522
78.	Constable Abid Ali No. 15/RR
79.	Constable Mian Gul Badshah No. 975
80.	Constable Namir Gul No. 417
81.	Constable Kiramat Shah No. 1440

OB No. 108

Dated: 31-5-2012.

  
 District Police Officer, Swat  
 \*30/05/2012\*

No 5788-92 EB, Dated Gulkada the 31-5-2012.

Copies of above for information & necessary action to the:-

1. Deputy Inspector General of Police, Malakand Region, Saidu Sharif, Swat.
2. Superintendent of Police, Investigation, Swat.
3. District Account Officer, Swat.
4. All Concerned
5. Pay officer, office.

\*\*\*\*\*

**ORDER**

NO 12 CTD Chitral

B-07-018

In compliance with the direction of Honorable Supreme Court, and Worthy Inspector General of Police, Khyber Pakhtunkhwa Peshawar vide Memo No S/6691-02/16 dated 10.10.2016, One Step out of turn promotions to the following Officers / Officials of CTD Khyber Pakhtunkhwa from their substantive ranks are also hereby withdrawn / cancelled and brought to their original / substantive ranks with immediate effect.

18

U

S.No	Name Rank & No	District	S.No	Name Rank & No	District
1.	SI Yasin Khan	Nowshera	49	HC Muhammad Zubair No 245	Tank FRP
2.	ASI Riaz Ali Khan	Mardan	50	HC Bakhtiar Khan No 346	Bannu
3.	ASI Hakim Khan	Charsadda	51	HC Syed Mudassar Shah No 34	Bannu
4.	ASI Riaz Gul	Mardan	52	HC Abdullah Akbar No 344	Bannu
5.	HC Ahmed Jan No 06	Peshawar	53	HC Saeda Ullah No 365	Bannu
6.	HC Gul Mai Khan No 18	Peshawar	54	HC Nowaz No 368	Bannu
7.	HC Nafees Ud Din No 24	Peshawar	55	HC Arif Ullah No 446	Bannu
8.	HC Abdul Malik No 28	Peshawar	56	HC Saad Ullah No 477	Bannu
9.	HC Khyal Mir No 96	Peshawar	57	HC Muhammad Arif No 153	Swabi
10.	HC Naimat Khan No 72	Peshawar	58	HC Gul Shed No 142	Nowshera
11.	HC Syal No 113	Peshawar	59	HC Misri Khan No 643	Abottabad
12.	HC Nasir Ud Din No 156	Peshawar	60	HC Aziz Ur Rehman No 97	Nowshera
13.	HC Kaleem Ullah No 167	Peshawar	61	HC Siraj Ud Din No 301	Pohistan
14.	HC Muhammad Ibrahim No 319	Peshawar	62	HC Sana Ullah No 621	Kohat
15.	HC Mohammad Syal No 304	Peshawar	63	HC Zahid Ullah No 632	Kohat
16.	HC Sajid Ali No 572	Peshawar	64	HC Gul Saeed No 582	Kohat
17.	HC Asim Ullah No 747	Peshawar	65	HC Shahbaz No 345	Tank
18.	HC Sheza Gul No 406	Special Case	66	HC Muhammad Ayaz No 175	Lakki Marwat
19.	HC Hameesh Khan No 04	Mardan	67	HC Sharif Ullah No 306	Lakki Marwat
20.	HC Amjad Khan No 82	Mardan	68	HC Noor Ul Amin No 473	Lakki Marwat
21.	HC Aurangzeb No 87	Mardan	69	HC Sajjad Hussain Shah No 48	DI Khan
22.	HC Bakht Zada Khan No 97	Mardan	70	HC Ghazi Gul No 68	DI Khan
23.	HC Gul Umer No 119	Mardan	71	HC Muhammad Tahir No 137	Tank FRP
24.	HC Lal Zada No 134	Mardan	72	HC Ikram Ullah No 181	Tank FRP
25.	HC Mozid Khan No 57	Mardan	73	HC Waheed Ullah No 186	Nowshera
26.	HC Kajeer Dad Shah No 152	Mardan	74	HC Abbas Khan No 114	Charsadda
27.	HC Foyaz Ali No 699	Mardan	75	HC Muneb Shah No 149	Charsadda
28.	HC Mudeen Hassan No 787	Mardan	76	HC Javed No 161	Charsadda
29.	HC Hashmat Ali No 104	Swabi	77	HC Masood Khan No 189	Charsadda
30.	HC Gul Shed No 142	Nowshera	78	HC Sajid Ullah No 180	Charsadda
31.	HC Javed Ahmad No 1370	Chitral	79	HC Sheda Muhammad No 20	Charsadda
32.	HC Nadeem Shah No 618	Kohat	80	HC Saad Ullah No 148	Swabi
33.	HC Ikram Shah No 499	Abottabad FRP	81	HC Amir Zada No 791	Swabi
34.	HC Danish Khan No 709	Swabi	82	HC Abdullah Khan No 709	Swabi

APPROVED  
 27/10/2016  
 Abbotsabad

MHE  
 for info  
 HC OFACID  
 03-07-019

35.	HC Lais Khan No 151	Karak	83	HC Tasneem Ul Haq No 1526	Buner
36.	HC Noor Rahim No 171	Karak	84	HC Bakht Munir No 501	Dir Lower
37.	HC Taj Malook No 641	Hangu	85	HC Khadim Ullah No 827	Dir Upper
38.	HC Muhammad Zaman No 174	Lakki Marwat	86	HC Muhammad Latif No 1304	Dir Upper
39.	HC Ali Ahmad No 1440	Chitral	87	HC Zakir Hussain No 1317	Chitral
40.	DHC Muhammad Yousaf No 264	Peshawar	88	DHC Aman Ullah No 64	Peshawar
41.	DHC Habib Khan No 92	Peshawar	89	DHC Gul Wahab No 123	Peshawar
42.	DHC Asad Zia No 599	Mardan	90	DHC Abdul Ghayas No 202	Swabi
43.	DHC Altaf Hussain No 172	Nowshera	91	DHC Waris Khan No 164	Nowshera
44.	DHC Tilewat Khan No 165	Charsadda	92	DHC Rehman Said No 837	Swat
45.	DHC Abdur Rashida No 838	Swat	93	DHC Muhammad Hassan No 872	Chitral
46.	DHC Rehmat Nabi No 880	Chitral	94	DHC Abdul Wadod No 1003	Bannu
47.	DHC Akhtar Faraz No 1060	Lakki Marwat	95	DHC Abdul Latif No 470	DI Khan
48.	DHC Asmat Ullah No 391	Lakki Marwat			

Due to non availability of the vacancies of Constables in this Unit, there pay will be drawn against the vacant post of Head Constables till further orders.

*[Signature]*  
 Additional Inspector General of Police,  
 CTD, Khyber Pakhtunkhwa,  
 Peshawar.

OB No 343/CTD  
 Dated 8/12/2016

No 13700 - IEC/CTD <sup>30</sup> Dated Peshawar the 08/12/2016

Copy of above is forwarded for information and necessary action

to the:-

- i. Worthy Inspector General of Police, Khyber Pakhtunkhwa w/r to his office Memo No S/6601-02/16 dated 10.10.2016.
- ii. All Regional SSSP, CTD Khyber Pakhtunkhwa.
- iii. Superintendent of Police, CTD HQrs; Peshawar.
- iv. SRC, CTD HQrs; Peshawar to check & make necessary entries in the service records of all those Police Officers / Officials of this Unit who have been promoted as out of turn.
- v. PA / PSO to Worthy Addl: IGP, CTD Khyber Pakhtunkhwa.
- vi. Acctt: CTD HQrs; Peshawar.
- vii. OASI, CTD HQrs; Peshawar.
- viii. MTO / MHC CTD HQrs; Peshawar.



OFFICE OF THE:  
SUPERINTENDENT OF POLICE,  
COUNTER TERRORISM DEPARTMENT (CTD),  
HAZARA REGION, AT ABBOTTABAD:

Tel No. 0992-9310454 Fax No. 0992-9310011

No 2008 /R.

Dated Abbottabad the 06/8/2018.

=====  
To: The Regional Police Officer,  
Malakand Region.

Subject: APPLICATION OF FC JAVAID NO; 1370.

Memo:

Enclosed kindly find herewith self explanatory application submitted by FC JAVAID NO; 1370\_of CTD Hazara Region for consideration and further orders, please.

Encl: (2 pages)

Superintendent of Police,  
Counter Terrorism Department (CTD)  
Hazara Region at Abbottabad

DII

ATTESTED  
ZULFIKAR AHMED  
Advocate High Court Abbottabad

جناب عالی

خود پانہ گزارش حکم سائل اپنے جائز عرض و عرض کی بناء  
پر جناب D.A.G صاحب ملاکنڈ رجسٹری سوات پرمیشن  
پونا جاتا ہے۔ لہذا سائل کو اردالی روم میں پیش ہونے  
کی اجازت دیا جاوے۔

نوازش ہوگی

*Received*

الغاضف کنیشن جاوید احمد بن 1370  
متصفیہ مقام CTD ہزارہ آبٹ آباد  
Mob: 0344-9743015  
0346-9891066

S/o

*for record*

*Received*

Station House Officer  
CTD Hazara Region  
Abbottabad

6-8-2018

Forwarded to W/O/19  
Malakand Region

*Mander*

SP/LED

صاب عالی

حقوق خدمت ہوں کہ مسائل صلح جنرل کار باغی باشندہ ہے

اور C.T.D ہزارہ ایبٹ آباد میں ڈیوٹی سر انجام دے رہا ہے  
 سال 2006ء میں MLR میں بھرتی ہو کر سوات آپریشن کے شروع  
 سے لیکر آف تک اپنی جان کئی سرواہ کئے بغیر اپنی فرائض کی ادائیگی میں  
 ہمیشہ پیش پیش رہا ہوں 2008ء کے آپریشن کے اختتام پر صوبائی حکومت  
 نے ان عام انٹرن اور جوانان کو ون ایبٹ پروفیشن دے دیا۔ جو  
 اس وقت آپریشن کے دوران اپنی ڈیوٹی پر موجود تھے۔ جس میں میں بھی  
 سرفہرست تھا۔ 2009ء کو میرا ٹرانسفر ڈسٹرکٹ جنرل کوہا - OSI سوات  
 نے قوق سے فائدہ اٹھا کر میرے جگہ کسی دوسرے کو پروفیشن کئے۔ ہم اسل  
 ڈرہا کی کورٹ گئے۔ آفر کار 2012ء کو علالت نے ہمیں بری کیا اور ہمارا  
 پروفیشن ہمیں دے دیا۔ اور میں چھیدہ کنٹریل پروفیشن ہو کر ایبٹ فورس،  
 CTD میں نوکری کر رہا ہوں

صاب والد! گذشتہ سال 2016ء میں C.T.D مشاورت سپریم کورٹ کا حوالہ دے کر  
 Rewered کر کے دوبارہ FC کے بینک میں لایا گیا ہے اور میرے ساتھ  
 اس وقت کے پروفیشن HCS ملاکنڈ رجمن کے کا اطلاع اور ایبٹ  
 فورس میں اپنے عہدوں پر بحال ہیں۔ اور نوکری کر رہے ہیں۔  
 صاب والد! کیا سپریم کورٹ کا آرڈر صرف قح میرے لئے ہے یا ساتھ ساتھ  
 ظلم ہے۔ اس سلسلے میں میں نے I.C.P. اچھا جسکو درخواست دی  
 صاب حضور نے میرے درخواست پر غور فرما کر انکو آئی کیلے آپ کے دربار میں بھیجا ہے  
 لہذا آئی سے استدعا ہے کہ مسائل کے درخواست کو قدرت رکھ کر مسائل در اہم فرمائیں  
 تاحیات دعائیں دیتا رہتا

Donic

العارض کنٹریل جاوید احمد 1370  
 C.T.D ہزارہ رجمن ایبٹ آباد  
 3-8-2018



OFFICE OF THE,  
DEPUTY INSPECTOR GENERAL OF POLICE,  
CTD, KHYBER PAKHTUNKHWA,  
PESHAWAR.

No 4199/EC/CTD dated Peshawar the 23/04/2018

23

III

ATTESSED  
ZULFIKAR AHMAD  
Advocate High Court Abbottabad

To:- The Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

**SUBJECT: APPLICATION/OUT OF TURN PROMOTION**

**MEMO:**

The following Constables of District Police Swat presently posted on deputation basis in this Unit have submitted their applications that they were promoted as One Step to the rank of Head Constables BS-07 by their parent District (copy is attached) and they were transferred/posted from District Police Swat to this Unit but they have been reverted from the rank of Head Constables to Constables due to out of turn promotion while their colleagues presently posted at District Swat are still performing their duties in the same rank.

- i. Constable Rehman Said No 837
- ii. Constable Javed Kam No 1370  
Ahmad

The above mentioned officials were reverted in this Unit as per direction of Honorable Supreme Court of Pakistan and CPO, Peshawar vide your office Endst: No S/6601-02/16 dated 10.10.2016 (copy is attached for ready reference), however, their colleagues are still on the similar position and still working as Head Constable in District Police Swat.

Their applications are forwarded herewith for the following opinions in the Police Policy Board, please.

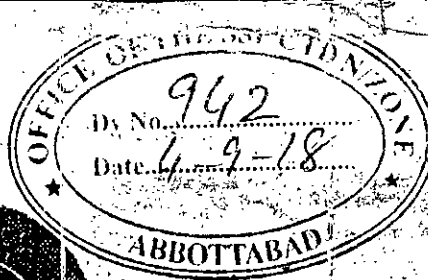
- i. They may be granted for One Step in this Unit as their colleagues were not been reverted.
- ii. May be repatriated to their parent District to promote as Head Constables with their colleagues.

SP/EC

For Deputy Inspector General of Police,  
CTD, Khyber Pakhtunkhwa,  
Peshawar.

01  
2





**F=**

ATTACHED  
24  
ZULFIKAR AHMED  
Advocate High Court Abbottabad

**REGIONAL POLICE OFFICER, MALAKAND**  
**AT SAIDU SHARIF SWAT.**  
Ph: 0946-9240388 & Fax No. 0946-9240390  
Email: digmalakand@yahoo.com

No. 7481 /E, date: Saidu Sharif the 03 / 09 /2018

To: The Superintendent of Police, CTD  
Hazara Region at Abbottabad.

Subject: APPLICATION OF FC JAVED NO. 1370.

Memorandum:

Please refer to your office memo No. 2003/R, dated 06/08/2018 on the subject above.

According to DPO, Swat vide his office memo: No. 15554/E, dated 28/08/2018, Para No. 2 of the application is worth perusal. The applicant while posted to CTD/Peshawar was reverted from the rank of Head Constable in the light of directions of the Honorable Supreme Court of Pakistan. Therefore, if deem fit necessary comments may kindly be sought from Deputy Inspector General of Police, CTD/Khyber Pakhtunkhwa Peshawar please.

Regional Police Offi.  
Malakand, at Saidu Sha

*[Handwritten signature]*  
3/1/20

# وکالت نامہ

کورٹ فیس

بعدالت

عنوان:

منجانب:

نوعیت مقدمہ:

باعت تحریر آنک

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

ایبٹ آباد ذوالفقار احمد ایڈووکیٹ سابق کورٹ

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گیا اور اس کا ساختہ پر داختم مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 15/01/2019

ایبٹ آباد

بمقام:

Attest  
Supt.

A. Shaukat  
Advocate

Stamp

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR.**

Service Appeal No. 328/2019.

Title: "Javed Ahmed V/S Secretary Gov't of KP and  
others"

**INDEX**

S. No	Documents	Page No. (From-To)
1	Index	01
2	Comments	02-06
3	Affidavit	07
4	Authority Letter	08

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL**  
**PESHAWAR.**

Service Appeal No. 328/2019.

Javed Ahmed S/o Nazoor Khan R/o Behtali Gol, P.O Shaghoor, Tehsil & District Chital  
presently posted as constable # 1370 of CTD, Hazara Region, Abbotabad.

.....(Petitioner)

VERSUS

1. Secretary Government of KP Home & TAs Department Peshawar.
2. Additional Inspector General of Police CTD, KP Peshawar.
3. Deputy Inspector General of Police, CTD, KPK, Peshawar.
4. Superintendent of Police, CTD Hazara Region at Abbottabad
5. District Police Officer Swat.

.....(Respondents)

3

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL**  
**PESHAWAR.**

Service Appeal No. 328/2019.

Subject:- **COMMENTS ON BEHALF OF RESPONDENTS (2,3 & 4).**

**Respectfully Sheweth**

Preliminary Objections:-

- a) The appellant has no cause of action or locus standi.
- b) The appeal is not maintainable in the present form.
- c) The appeal is bad for mis-joinder and non-joinder of necessary parties.
- d) The appellant is estopped to file the appeal by his own conduct.
- e) The appeal is barred by law and limitation.
- f) The appellant has not come to the Honorable Tribunal with clean hands.
- g) The reversion has been made as per Order of the August Supreme Court.

**FACTS:-**

1. Correct to the extent that during the period of militancy in the year 2008-2009, terrorism in the country in general and in Khyber Punkhtunkhwa particularly, many Police officers/ officials have been martyred while fighting against the terrorists. In order to encourage the Swat Police, the then CM KP visited Swat and announced that one step promotion shall be given to the Swat Police as they rendered valuable services by fighting against terrorists.
2. Pertains to record, hence needs no comments.
3. Pertains to record, hence needs no comments.
4. That promotion from one rank to another is being dealt in accordance with chapter 12 and 13 of Police Rules 1934 which laid down the criteria for the promotion to the next higher rank strictly in accordance with law. Moreover, certain mandatory courses and training have also been inducted in KP Police Act, 2017 which purely deals with the seniority and promotions of Police officers/officials. It is pertinent to mention here that honorable Supreme Court Judgment in para No.76(i) inter Court appeal, 2017/18 Judgment dated 13/05/2018 has withdrawn the earlier judgment of High Courts, Service Tribunals and Supreme Court wherein out of turn promotions were granted to individuals. Therefore, in view of above referred Judgment of Honorable Supreme Court of Pakistan no protection of validation Act, Standing Orders which provides incentives referred in

promotion, therefore, the stance of the appellant cannot be entertained due to the following grounds.

**GRUNDS:-**

- a. Incorrect, the Supreme Court of Pakistan vide judgments referred in preceding paras, declared all out of turn promotion including gallantry incentives under Validation Act, Rules (Legislative instrument) and policy of any nature ab-initio void and null even withdrawn earlier decision of High Court null and void, Service Tribunal and the Supreme Court of Pakistan granted out of turn promotions to individuals by exercising suo-Moto jurisdiction.
- b. Incorrect, The action taken by the respondents in compliance with the judgment of Supreme Court of Pakistan reported in 2013 SCMR, 1752-2015 SCMR, 456 2017 SCMR, 206 and intra Court appeals of 2017/2018- judgment dated 13/05/2018 is quite legal and in accordance with law/rules.
- c. Incorrect, The Supreme Court of Pakistan directed all Chief Secretaries of the provinces to implement the judgments referred above in letter and spirit.
- d. Incorrect, As already explained above.
- e. Incorrect, Promotions and seniority of members of Police Force are being dealt in accordance with chapter 12 and 13 of Police Rules, 1934 being special law which laid down the criteria for the promotion to the next higher rank strictly in accordance with law. Moreover, certain mandatory courses and training have also been inducted in KP Police Act, 2017 which purely deals with the seniority and promotions of Police Officers/Officials.
- f. Incorrect, the case of appellant comes under the domain of out of turn promotion.
- g. That the respondents may also be allowed to raise additional grounds at the time of hearing.

this Para should be left, Furthermore, the honorable Ex-Chief Justice Hafiz Saeed Khosa has passed the following remarks in Judgment dated 2017 SMCR 1752.

" It is true that the judicial precedent available thus far declared mala fide cannot be attributed to the legislature but if a legislature deliberately and repeatedly embarks upon a venture to nullify considered judicial verdict in an unlawful manner, trample the constitutional mandate and violate the law in the manner it was done in the present case then it is difficult to attribute bona fide to it either".

5. As explained above in preceding para, However worth mentioning here that all sort of out of turn promotion have been declared as unconstitutional and un Islamic, promotion in Police Department is being regulated under chapter 13 of Police Rules 1934, therefore, one has to undergo certain training and fulfilling certain criteria fixed for promotion should have been promoted from one rank to another. One step promotion is not covered under the rule and the same comes under the domain of out of turn promotion.
6. Pertains to record.
7. Pertains to record.
8. The seniority and promotion are dealt in accordance with chapter 12 and 13 of Police Rules 1934 which laid down the criteria for the promotion to the next higher rank strictly in accordance with law . Under Police Rule, 1934 promotion lists are separately maintained from the seniority list such as A, A1, B1, C, D, E and F. The confirmed officer from the seniority list are picked up for the promotion at district, divisional and provincial level to the next higher rank making a pyramid to filter officer for promotion to the next rank on the seniority cum fitness. The leftover are constrained to improve his performance and compete for promotion and to achieve the goals of "seniority cum fitness" as a pre requisite for promotion as envisaged by rule 13.1 of Police Rules 1934. Furthermore, there are certain criteria for promotion to the next higher rank laid down in Police Rules 1934 and KP Police Act, 1917. Until and unless these criteria are not fulfilled, no one can promote to the next higher rank. Moreover, one step promotion comes under the domain of out of turn promotion which has been declared as unconstitutional and illegal by the Apex court. Some petitions are pending sub judice before the Peshawar High Court, Peshawar wherein larger bench has been constituted in the matter of out of turn

promotion, therefore, the stance of the appellant cannot be entertained due to the following grounds.

**GROUNDS:-**

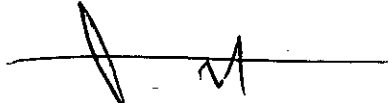

- a. Incorrect, the Supreme Court of Pakistan vide Judgments referred in preceding paras, declared all out of turn promotion including gallantry, incentives under Validation Act, Rules (Legislative instrument) and policy of any nature ab-initio void and null even withdrawn earlier decision of High Court null and void, Service Tribunal and the Supreme Court of Pakistan granted out of turn promotions to individuals by exercising Suo-Moto jurisdiction.
- b. Incorrect, The action taken by the respondents in compliance with the Judgment of Supreme Court of Pakistan reported in 2013 SCMR, 1752-2015 SCMR, 456 2017 SCMR, 206 and intra Court appeals of 2017/2018- Judgment dated 13/05/2018 is quite legal and in accordance with law/ rules.
- c. Incorrect, The Supreme Court of Pakistan directed all Chief Secretaries of the provinces to implement the judgments referred above in letter and spirit.
- d. Incorrect, As already explained above,
- e. Incorrect, Promotions and seniority of members of Police Force are being dealt in accordance with chapter 12 and 13 of Police Rules 1934 being special law which laid down the criteria for the promotion to the next higher rank strictly in accordance with law. Moreover, certain mandatory courses and training have also been inducted in KP Police Act, 2017 which purely deals with the seniority and promotions of Police Officers/ Officials.
- f. Incorrect, the case of appellant comes under the domain of out of turn promotion.
- g. That the respondents may also be allowed to raise additional grounds at the time of hearing.




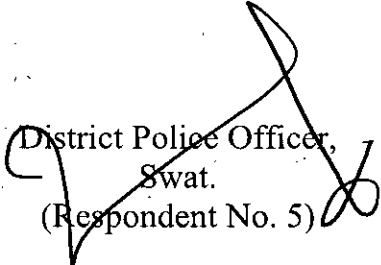
6

**Prayer:**

In view of the above comments on facts and grounds, it is humbly prayed that the instant petition along with interim relief being not maintainable under the law, may kindly be dismissed with costs.

  
  
Deputy Inspector General of Police,  
Khyber Pakhtunkhwa,  
CTD, Peshawar.  
(Respondent No. 2 &3)

  
Superintendent of Police,  
CTD Hazara Region.  
(Respondent No. 4)

  
District Police Officer,  
Swat.  
(Respondent No. 5)

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA.**

**Service Appeal No. 328/2019.**

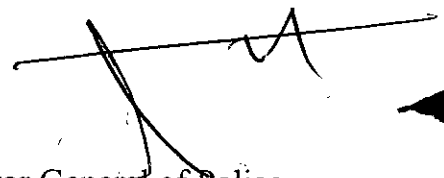
Javed Ahmed.....(Appellant)

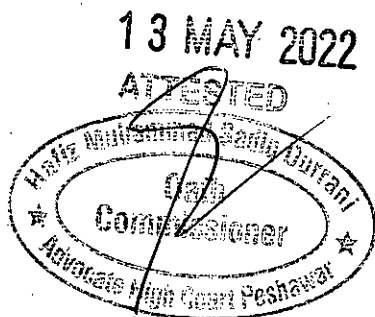
VERSUS


Gov't of KP & Others.....(Respondents)

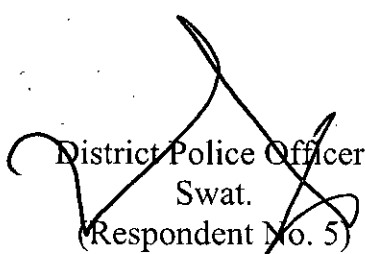
**AFFIDAVIT**

We, the below mentioned respondents, do here by solemnly affirm and declare on oath that the contents of reply submitted are correct and true to the best of our knowledge and belief and that nothing has been concealed from this Honorable Court.

  
Deputy Inspector General of Police,  
Khyber Pakhtunkhwa,  
CTD, Peshawar.  
(Respondent No. 2 &3)



  
Superintendent of Police,  
CTD Hazara Region.  
(Respondent No. 4)

  
District Police Officer,  
Swat.  
(Respondent No. 5)




8

**OFFICE OF THE  
DEPUTY INSPECTOR GENERAL OF POLICE,  
COUNTER TERRORISM DEPARTMENT,  
KHYBER PAKHTUNKHWA,  
PESHAWAR.**

**AUTHORITY LETTER**

I, the undersigned, do hereby authorize SI Mr. Gulzad Khan having CNIC NO. 17301-5214940-9 to submit reply in **Service Appeal No. 328/ 2019** titled "**Javed Ahmed V/S Secretary Gov't of KP and others**" and to pursue the matter on behalf of the undersigned.

  
Deputy Inspector General of Police,  
Khyber Pakhtunkhwa,  
CTD, Peshawar.  
(Respondent No. 2 &3)

کورٹ فیس

وکالت نامہ

بعدالت  
عنوان: ~~Before the chairman of~~ <sup>سے</sup> ~~گورنمنٹ ٹریبونل~~ <sup>سے</sup> ~~گورنمنٹ ٹریبونل~~  
منجانب: ~~ریسٹریٹر~~  
نوعیت مقدمہ:

### باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے اسے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام  
محمد رستگار تنویر ایس وکیل صاحب <sup>ASC</sup>

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب  
موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء  
وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور  
کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار  
بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و  
قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔  
نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف  
پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف  
مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراہ استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کے  
پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقومہ 21/9/2017

Accepted  
مقام:



M. Ahmad Asc

العبد