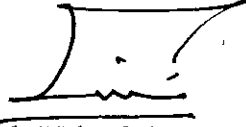



15<sup>th</sup> Nov, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Shams-ur-Rehman, Inspector (Legal) for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief of the instant appeal. To come up for arguments on 13.12.2022 before the D.B at Camp Court Abbottabad.

  
(Salah Ud Din)  
Member (Judicial)  
Camp Court Abbottabad


  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

16.06.2022

Appellant with counsel present.

Noor Zaman Khan Khattak, learned District Attorney alongwith Jehanzeb Khan SI (Legal) for respondents present.

Former submitted rejoinder with a request for adjournment. Adjourned. To come up for arguments on 17.08.2022 before D.B at Camp Court, Abbottabad.



(Fareeha Paul)  
Member (E)  
Camp Court, A/Abad



(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

19<sup>th</sup> Oct., 2022

Appellant present in person. Mr. Kabirullah Khattak, Addl. Advocate General for the respondents present.

Appellant seeks adjournment due to non-availability of his learned counsel. Last opportunity is granted. To come up for arguments on 15.11.2022, ~~before D.B at Camp Court, Abbottabad.~~



(Fareeha Paul)  
Member (E)

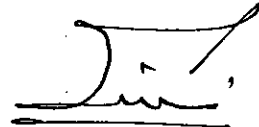


(Kalim Arshad Khan)  
Chairman

20.12.2021

Learned counsel for the appellant present. Mr. Muhammad Azhar, Head Constable alongwith Mr. Riaz Ahmed Painsdakhel, Assistant Advocate General for the respondents present.

Para-wise comments on behalf of respondents No. 1 & 2 have already been submitted through office, which are placed on file and copy of the same is handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 15.02.2022 before the D.B at Camp Court Abbottabad.




(Salah-Ud-Din)  
Member (J)

Camp Court Abbottabad


20.05.2022

Counsel for the appellant present. Syed Naseer ud Din, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments before D.B on 16.06.2022 at camp court Abbottabad.



(Fareeha Paul)  
Member(E)



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

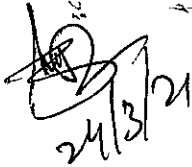
18.03.2021

Appellant present through counsel.

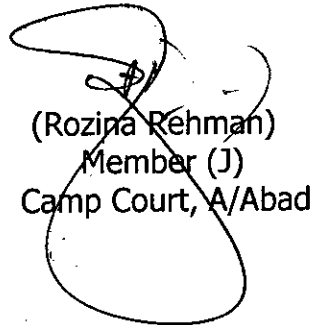
Riaz Khan Paindakheil learned Asst. AG alongwith Sadaqat Nisar Inspector for respondents present.

Reply submitted. Preliminary arguments heard. File perused.

Appellant Deposited  
Ap Court Security & Process Fee

  
21/3/21


Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. To come up for rejoinder, if any, and arguments on 20/5/2021 before D.B at Camp Court, Abbottabad.

  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

20.05.2021


Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 27.09.2021.

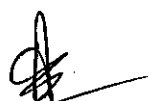
  
Reader

  
27.09.2021

Clerk of counsel for the appellant and Mr. Muhammad Rashid Khan, DDA present. No representative of the respondents is in attendance.

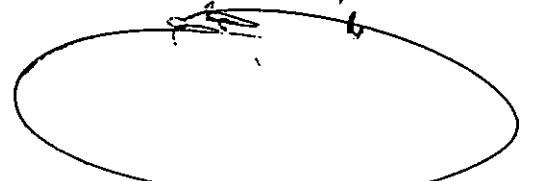
Notices be issued to the respondents. Case to come up for arguments on 20.12.2021 before the D.B. at Camp court, Abbottabad

  
(Rozina Rehman)  
Member(Judicial)  
Camp Court, A/Abad

  
Chairman  
Camp Court, A/Abad

18.09.2020

Appellant himself alongwith Mr. Sardar Aman Khan, Advocate are present. Argument of learned counsel for appellant heard, therefore, it is deemed appropriate to issue pre-admission notice to respondents for 18.12.2020 directing them to submit their reply. File to come up for preliminary arguments before S.B at Camp Court, Abbottabad.



(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

*Due to COVID-19 case is  
adjourned to 18-03-2021*



18.03.2021

~~Appellant present through counsel. Preliminary arguments heard. File perused.~~

~~Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. To come up for rejoinder, if any, and arguments on 17/3/2021 before Dis at Camp Court, Abbottabad.~~



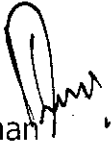
~~(Reema Rehman)  
Member of  
Camp Court A/Abad~~

Form- A

FORM OF ORDER SHEET

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

Case No.- 7729 /2020


1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/07/2020	<p>The appeal of Mr. Raja Waqas resubmitted today by Mr. Sardar Aman 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</p>
2-	10.09.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>10/09/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Appellant in person present.</p> <p>Requests for posting of instant appeal before <del>Primary</del> <sup>Primary</sup> Bench of this Tribunal at Abbottabad.</p> <p>The appellant as well as respondents are from Abbottabad/Kohistan, therefore, the request of appellant appears to be reasonable. Instant appeal shall, therefore, be fixed for hearing at Abbottabad <del>for hearing</del> on 18.09.2020.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Raja Waqas, Ex-Constable received today i.e on 29-06-2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. copies of charge sheet, statement of allegation, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
2. Memo of appeal be got signed by appellant.

No. 1338 /S.T,

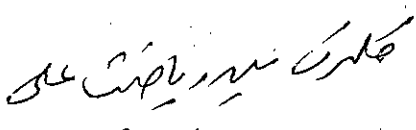
Dt. 29-06 /2020

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Sardar Aman Khan, Adv, Abbottabad.

Resubmitted  
Copies of charge sheet, statement of allegation, show cause notice, enquiry report and replies thereto have not been provided to the appellant.

Objection No. 2 has been removed.

  
S. K. K. K.  
13-7-2020

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR CAMP AT ABBOTTABAD**

Service Appeal No. \_\_\_\_\_/2020

Raja Waqas, Ex-Constable No. 940 of District Upper Kohistan, Resident of Mohallah Makki Near Makki Masjid House No. 59, Street No. 2, Khola Kehal Tehsil and District, Abbottabad.

...APPELLANT

**VERSUS**

Deputy Inspector General of Police/ RPO Hazara Region, at Abbottabad & another.

...RESPONDENTS

**SERVICE APPEAL**

**INDEX**

S.#	Description	Page No.	Annexure
1.	Memo of Appeal	1 to 6	
2.	Copy of order dated 02/10/2019	7	"A"
3.	Copy of departmental appeal	8 to 9	"B"
4.	Copy of order dated 19/03/2020	10	"C"
5.	Copies of application	11 to 13	"D"
6.	Wakalatnama	14	

Dated: 22 / 16 /2020

Through

...APPELLANT

  
(SARDAR AMAN KHAN)

Advocate Supreme Court of Pakistan  
At Abbottabad



**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR CAMP AT ABBOTTABAD**

Khyber Pakhtunkhwa  
Tribunal

Diary No. 5688

Dated 29-6-2020

Service Appeal No. 7729 /2020

Raja Waqas, Ex-Constable No. 940 of District Upper Kohistan, Resident of Mohallah Makki Near Makki Masjid House No. 59, Street No. 2, Khola Kehal Tehsil and District, Abbottabad.

...APPELLANT

VERSUS

1. Deputy Inspector General of Police/ RPO Hazara Region, at Abbottabad.
2. District Police Officer, Upper Kohistan.

...RESPONDENTS

APPEAL UNDER ARTICLE 212 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 READ WITH SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 READ WITH ALL THE OTHER ENABLING LAWS AGAINST THE IMPUGNED ORDER DATED 02/10/2019 WHEREBY, RESPONDENT NO. 2 DISMISSED APPELLANT FROM SERVICE AND SIMILARLY ORDER DATED 19/03/2020 PASSED BY THE RESPONDENT NO. 1 UPON THE DEPARTMENTAL APPEAL OF THE APPELLANT WHICH ARE ILLEGAL,

Filed to day  
29/6/2020  
Registrar

Re-submitted to -day  
and filed.

Registrar  
13/7/2020

AGAINST THE LAW AND FACT AND ARE  
LIABLE TO BE SET-ASIDE.

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**PRAYER:-** ON ACCEPTANCE OF THE  
INSTANT APPEAL ORDER DATED 02/10/2019  
& 19/03/2020 MAY GRACIOUSLY BE SET  
ASIDE AND APPELLANT BE REINSTATED  
IN SERVICE WITH ALL BACK BENEFITS.  
ANY OTHER RELIEF WHICH THIS  
HONOURABLE TRIBUNAL DEEMS FIT AND  
PROPER IN THE CIRCUMSTANCES OF THE  
CASE.

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Respectfully Sheweth:-

1. That appellant joined Police Force on 10/06/2006 and always performed his duties with devotion and dedication.
2. That vide order No.105 dated 02/10/2019 the appellant has been terminated from service. Copy of order dated 02/10/2019 is attached herewith as Annexure "A".
3. That against the order of termination appellant filed departmental appeal before

learned RPO Abbottabad on 31/10/2019.

Copy of departmental appeal is attached herewith as Annexure "B".

4. That appeal filed by appellant has been dismissed by the learned RPO Abbottabad vide order dated 19/03/2020. Copy of order dated 19/03/2020 is attached herewith as Annexure "C".
5. That feeling aggrieved of the impugned orders dated 02/10/2019 & 19/03/2020, the appellant has now come to this Honourable Tribunal with the instant appeal inter-alia, on the following grounds.

**GROUND:-**

- a. That the impugned order is violative of the principal of natural justice. The appellant has not been treated in accordance with law and the rules on the subject. Hence the impugned order is liable to be set aside.
- b. That the appellant produced the complete record of illness of his

mother and his wife before learned enquiry officer despite of fact that enquiry officer mentioned the entire situation in his report even than he proposed major penalty. Hence the impugned order is liable to set aside.

c. That, appellant submitted number of applications for grant of leave to concerned official, but neither same were accepted or rejected nor considered by the enquiry officer or worthy DPO, as respondents were aimed to penalize the appellant. Copies of application is attached as Annexure "D".

d. That no proper enquiry has been conducted. The appellant has not been provided awarded any opportunity to defend charges against him and to be heard in accordance with law of Natural Justice, equity and fair play. It was an one sided decision made by DPO Kohistan and being which is nullity in the eye of law and can't

hold the field and is liable to be set aside.

e. That the contention of the appellant has neither been considered nor opportunity of personal hearing has been granted to the appellant, hence the enquiry being conducted one sidedly is liable to be set aside and in consequence thereof, the impugned orders are liable to be set aside.

f. That service record of the appellant is self explanatory, neat and clean and there is no complaint from any public or private forums available on record which could be made basis for initiating enquiry.

g. That even otherwise, the appellant is innocent and even if the so called charges leveled against appellant are deemed to be correct, even then the punishment awarded for those charges is very harsh and unjustified. Hence

the impugned order is liable to be set aside.

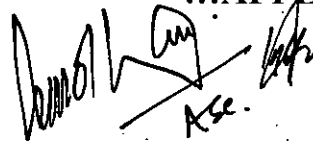
- h. That the appeal is well within time and the appellant also deserves to be reinstated in service in view of the facts and grounds mentioned above.

It is therefore humbly prayed that on acceptance of the instant appeal order dated 02/10/2019 & 19/03/2020 may graciously be set aside and appellant be reinstated in service with all back benefits. Any other relief which this Honourable Tribunal deems fit and proper in the circumstances of the case.

Dated: 22/6 /2020

Through

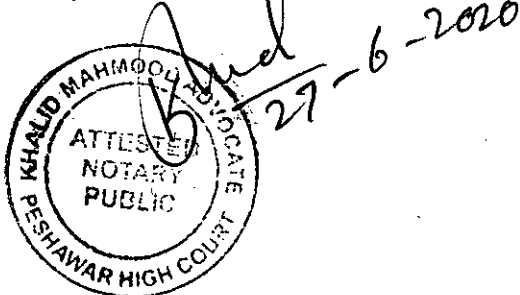
...APPELLANT



(SARDAR AMAN KHAN)  
Advocate Supreme Court of Pakistan  
At Abbottabad

**VERIFICATION:-**

*Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.*



...APPELLANT



ANNEXURE "A"

ORDER

P-7

Constable Raja Wiqas No. 940 was transferred from Abbottabad to this district on complaint basis, vide Regional Police Officer, Hazara Region Abbottabad office order No.121-25/E, dated 01-01-2019.

He has been absented, vide DD No. 05 dated 05-02-2019 to till date.

Charge Sheet & Disciplinary Action was issued to him on 21-03-2019 and Mr. Matloob Khan & Mr. Amin Khan, SDPO Shatjal has been appointed as an enquiry officer and the said Charge Sheet was served upon him through MM of local police Post Harno Abbottabad, but said constable did not submit reply of Charge Sheet.

Final Show Cause Notice was issued to him and the same has been sent to his home address for service upon through DPO Abbottabad, vide this office letter No.1117/PA dated 31-05-2019, which was served upon him through local police vide DPO, Abbottabad office letter No.4710/GB dated 16-07-2019, but failed to submit written reply in his defense and did not make his arrival in this district so far.

Keeping in view the recommendations of Enquiry Officer, it revealed that constable Raja Waqas No.940 is a habitual absentee and did not take interest in his duty/job, so I came to this conclusion that he cannot become a good police officer in future being a discipline force.

Therefore, in exercise of the powers vested in the undersigned under Rules-2 of Police department Rules - 1975, I, Abdul Saboor Khan, PSP, District Police Officer, Upper Kohistan as a competent authority am constrained to award him the punishment of "Dismissal from service" from the date of absence i.e. 05-02-2019, with immediate effect.

Order announced.

OB No 105  
Dated 02/10/2019.

(ABDUL SABOOR KHAN)PSP  
District Police Officer,  
Upper Kohistan

No. 2188 /OHC, dated 02.10.2019.

Copy of the above is forwarded to the District Police Officer, Torghar alongwith enquiry file (in original) containing 33 pages for necessary action and completion of record, please.

District Police Officer,  
Upper Kohistan

ATTESTED

بخدمت جناب ریجنل پولیس آفیسر ایبٹ آباد

P-8

عنوان؛ محکمانہ اپیل برخلاف حکم مجاریہ DPO اپر کوہستان آرڈر بک نمبری 105 محررہ 02/10/2019 جس کی رو سے ایپلانٹ کو اس کی تاریخ غیر حاضری جو کہ 05/02/2019 سے فی الفور نوکری سے برخاست کیا گیا تھا۔

جناب عالی!

گزارش ہے کہ جناب DPO اپر کوہستان نے ایپلانٹ کو بذریعہ حکم نمبری 105 محررہ 02/10/2019 کو بوجہ نام نہاد غیر حاضری عرصہ ازاں 05/02/2019 تا جاری کرنے حکم متدعو یہ نوکری سے برخاست کیا۔ (نقل حکم متدعو یہ لف ہے)۔

یہ کہ اس سے قبل ایک انکوائری بذریعہ SDPO صاحب شتیال ہونا اور چارج شیٹ، الزامی بیان بابت نام نہاد غیر حاضری مدت ایپلانٹ کے گھر کے پتہ پر بھیجنا ظاہر کیا گیا۔ (نقولات چارج شیٹ، الزامی بیان لف ہیں)۔

یہ کہ دوران انکوائری ایپلانٹ نے انکوائری آفیسر کو اپنی بیماری، بیوی اور والدہ کی انتہائی نازک صورتحال سے تفصیلی طور پر آگاہ کیا، جو کہ انکوائری آفیسر نے اپنی رپورٹ جو کہ DPO صاحب کوہستان کو بھیجی گئی تھی میں درج کیا اور غیر مجازانہ طور پر ایپلانٹ کے لئے بڑی سزا تجویز کی۔

یہ کہ آخری شوکاژ نوٹس میں بھی ایپلانٹ کی طرف سے بیان کی گئی وضاحت کا کہیں بھی ذکر موجود نہ ہے، لہذا حکم برخاستگی مفروضوں پر جاری کیا گیا۔ (نقولات دستاویزات متعلقہ لف ہیں)

یہ کہ کوئی باضابطہ انکوائری نہیں کی گئی اور انکوائری آفیسر کی رپورٹ کوئی وقعت نہ رکھتی ہے جو کہ قابل واپسی ہے۔ یہ کہ ایپلانٹ کو کوئی حق جرح نہ دیا گیا اور ایک غیر قانونی یکطرفہ فیصلہ DPO اپر کوہستان کی رو سے ایپلانٹ کی نوکری یک جنبش قلم ختم کر دی گئی جو کہ قانون کے تحت برقرار نہیں رہ سکتا اور قابل منسوخی ہے چونکہ ایپلانٹ ایک قابل اعتماد سروس ریکارڈ کا حامل ہے۔

یہ کہ اگر انکوائری آفیسر نے منصفانہ اور غیر جانبدارانہ انکوائری کرتا اور ایپلانٹ کی طرف سے کی وضاحت کو ملحوظ خاطر رکھتا

ATTESTED







ANNEXURE "C" P-10

OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD  
0992-9310021-22  
0992-9310023  
r.rpohazara@gmail.com  
0345-9560687  
NO: 8705 /PA DATED 19/03/2020


ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Raja Waqas No. 940 of District Upper Kohistan against the order of punishment i.e. *Dismissal from Service* awarded by District Police Officer, Upper Kohistan vide OB No.105 dated 02.10.2019.

Brief facts leading to the punishment are that the appellant absented from duty vide Daily Diary No.05 dated 05.02.2019 Police Lines Komila till the date of dismissal i.e. 02.10.2019 (*total absence 07 months and 27 days*).

The appellant was issued charge sheet alongwith summary of allegations and SDPO Shatiyal was deputed to conduct departmental enquiry. The Charge Sheet was served upon the appellant through DPO Abbottabad, however the appellant neither submitted reply nor joined enquiry proceedings. Consequently the EO recommended him for suitable punishment. The appellant was issued with final show cause notice and called in OR through DPO Abbottabad, however he failed to submit reply or appear in person. Keeping in view the above DPO Upper Kohistan awarded him major punishment of dismissal from service.

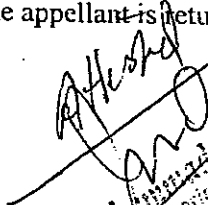
After receiving his appeal, comments of DPO Upper Kohistan were sought and examined/perused. The undersigned called the official in OR and heard him in person. Perusal of his previous record transpires that the appellant was transferred to Upper Kohistan on complainant basis as he remained involved in illegal activities. Moreover the appellant has been *dismissed from Service 3<sup>rd</sup> time* which shows his lack of interest in official duty. In addition to this the appellant also failed to advance any plausible reason to justify his absence. Therefore in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 appeal of the official is hereby *filed* with immediate effect.

  
Qazi Jamil ur Rehman (PSP)  
Regional Police Officer  
Hazara Region, Abbottabad

No. 8706 /PA, dated Abbottabad the 19--03 /2020.

CC.

1. The District Police Officer, Upper Kohistan for information and necessary action with reference to his office Memo No 1921/Legal dated 14-11-2019. Service Roll and Fuji Missal containing enquiry file of the appellant is returned herewith for record.

  
S. Muhammad Hishab  
Cases Supervisor  
For Regional Police Officer  
Hazara Region Abbottabad  
06/03/2020

**ATTESTED**

پناہ گاہی P-11

تذکرہ کے نام میں (19) ON 19 اور نو نومبر

میں سے پناہ گاہی کے تحت عدالت عالیہ اور

دیگر عدالتوں میں سے کوئی ایک قابل ذمہ داری ہے

میں سے دو سے زیادہ پناہ گاہی کے پناہ گاہی

میں سے پناہ گاہی اور پناہ گاہی کے پناہ گاہی

میں سے پناہ گاہی کے پناہ گاہی

میں سے پناہ گاہی کے پناہ گاہی

میں سے پناہ گاہی کے پناہ گاہی

میں سے پناہ گاہی کے پناہ گاہی

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میں سے پناہ گاہی کے پناہ گاہی

میں سے پناہ گاہی کے پناہ گاہی

10/07/2019

ATTESTED

P-12

فوجیاتی: تدارک کے لئے مسائل کا حوالہ دیا گیا  
 بیان کے لئے جس کے لئے مسائل کے لئے دستاویز قابل ترمیم  
 خوراک کے لئے ہیں جانے مسائل کو دیکھ کر  
 درج ذیل

میں بڑے درجہ میں مسائل کے لئے  
 مسائل کو دو ماہ کے اندر حل کیا جائے

الکاح: 1000 روپے کی جرمانہ 940 روپے کی جرمانہ  
 میں سے 100 روپے کی جرمانہ

Amir

22/5/2019

ATTESTED

گزارش معلم سائل بوجه اشد ضرورت فاقہ

رفتہ اتفاقہ درکار ہے

نیز لہ در فوائد نیز الخامس معلم سائل

کو رفتہ اتفاقہ میں سے بندہ یوم (15)

کی رفتہ اتفاقہ دی جائے۔ 4/2  
2019

العلیہ  
نیل رام وقاص نمبر 940 ستیہ پولیس لائن

کھیلہ اہر کوستان

*(Signature)*

ATTESTED

الحاج سردار بہادر خان (مرحوم) لاء ایسوسی ایٹس

بعدالت ضرب صبر مختونخواہ مسروس کمرینڈل لیسٹ در کمر کمر لیسٹ

بمقدمہ درامہ و قاضی بنام DIG و دیگر

مورخہ 22/6/20 منجانب ضرب

دعویٰ اپیل انگریزی اور درخواست آرٹ پٹیشن سروس لیسٹ

بجرم

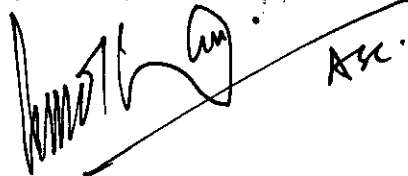
مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی مقام لیسٹ

سردار امان خان ایڈووکیٹ سپریم کورٹ آف پاکستان بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو بروعدالت حاضر ہونا ہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صادر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز کچہری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پر داخہ صاحب مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل انگریزی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرانے کا ہر قسم کا بیان دینے اور سپرد و تاشی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کو اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یک طرفہ درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا بیگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے۔ صاحب موصوف کو پوری فیسیارٹخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کی سند ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور کرتے ہوئے اپنے دستخط انشان انگوٹھا ثبت کر دیے ہیں۔ نیز بصورت تیدگی وکیل صاحب موصوف میری ہماری کوئی دعویٰ داری نسبت فیس ہائے وارٹائنش پر نہ ہوگی۔ لہذا وکالت نامہ تحریر کر دیا ہے تاکہ سند ہے۔

المرقوم: 22/6/20

مقام لیسٹ کے لئے منظور ہے۔

ATTESTED & ACCEPTED



Sardar Aman Khan

Advocate Supreme Court of Pakistan

Call # 0321-9800878

"B"

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

No.

TB

Appeal No..... 7729 ..... of 20 20  
Raja Waqas ..... Appellant/Petitioner  
Versus  
D/G, RPO, Hazara Region A. Road ..... Respondent  
Respondent No..... I

Notice to:

- Deputy Inspector General of Police /  
RPO Hazara Region at Abbottabad

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.

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..... 29/10.....

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

at Camp Court A. Road

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.....7729..... of 20 20

.....Raja Waqas.....Appellant/Petitioner

Versus

.....D.I.G., R.P.O., A. Abad.....Respondent

Respondent No.....2.....

*Present admission*

Notice to:

*- Distt. Police office Upper Kohistan*

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.....18-12-2020.....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.....29/12.....

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

*at camp const A. Abad*

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.**

*TJB*

No.

*o/c* Appeal No. 7729 of 20 20  
Raja Muzaffar Appellant/Petitioner  
 Versus  
D.I.G. Hazara A Road Respondent  
 Respondent No. 2


Notice to: - DPO, Kachistan

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 26/12/2021 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 16/12/2021  
 Day of December 2021.

*at Camp Hazara A Road*  
  
 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. 7729 of 2020

Raja Wagar Appellant/Petitioner

D.T.G / RPO Hazara Region at A/Abad Respondent

Respondent No. 1

Notice to: Deputy Inspector General of Police/RPO  
Hazara Region, at Abbottabad.


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 20-12-2021 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 6<sup>th</sup> Day of Oct 20 21

(at Camp Court A/Abad)

  
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.