


13.06.2022

Counsel for the appellant present. Mr. Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Reply on behalf of respondents is still awaited. Notices be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 18.08.2022 before S.B at Camp Court Abbottabad.


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

18.08.2022

Tour to camp court Abbottabad has been cancelled, therefore, the case is adjourned on 20.10.2022 for the same.

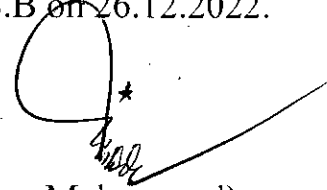
READER

20.10.2022

Nemo for the appellant. Mr. Muhammad Jan, District Attorney for the respondents present.

Previous date was changed on the strength of Reader's Note, therefore, notice be issued to the respondents for submission of reply/comments. Notice be also issued to the appellant as well as his counsel to attend the court on the next date. Adjourned.

To come up for reply/comments before the S.B on 26.12.2022.


(Mian Muhammad)
Member (E)

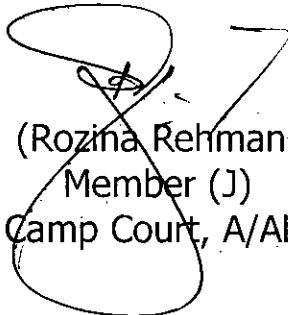
SCANNED
KPST
Peshawar

17.11.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for written reply/comments on 16.03.2022 before S.B at Camp Court, Abbottabad.

Appel
Security Process Fee


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

16.03.2022


Due to retirement of the Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same before on 18.05.2022


Reader

18.05 2022

Appellant in person present. Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Previous date was change^d through Reader's note. Therefore, notices for submission of written reply/comments be issued to the respondents. To come for written reply/comments before S.B at camp court Abbottabad on 13.06.2022.

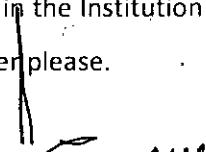

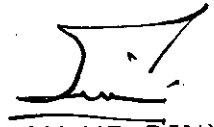

(Fareeha Paul)
Member (E)
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 12453 /2020 20

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/10/2020	<p>The appeal of Mr. Muhammad Shoukat resubmitted today by Mr. Musawar Aslam Tanooli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	<p>22-1-2021</p>	<p>This case is entrusted to touring S. Bench at A.Abd for preliminary hearing to be put up there on <u>22-01-2021</u></p> <p> CHAIRMAN</p> <p>Due to Covid 19, case is adjourned to 24-9-21 for the same.</p> <p>♀ Reader</p>
24.09.2021		<p>Nemo for the appellant.</p> <p>Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 17.11.2021 at Camp Court Abbottabad.</p> <p> (SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT ABBOTTABAD</p>

The appeal of Mr. Muhammad Shoukat Ex-Warder District Jail Abbottabad received today i.e. on 12.10.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is photo state copy which is not acceptable. ✓
- 2- Copy of departmental appeal is not attached with the appeal which may be placed on it. ✓
- 3- Copy of order 22.07.2020 is illegible which may be replaced by legible/better one. ✓
- 4- Annexures of the appeal may be attested. ✓
- 5- Annexures of the appeal may be flagged. ✓

No. 2950 /S.T,

Dt. 14/10 /2020.

REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Musawar Aslam Tanoli Adv.
High Court Mansehra

Respected Sir!

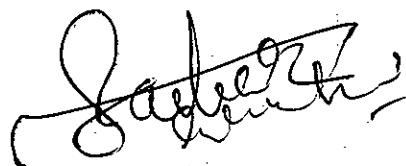
Objection No. 1 has been complied with.

Objection No. 3 is complied with.

Objection No. 4 & 5 Complied with.

As far as objection No. 2 is concerned it is submitted that the respondents are not handing over copy of appeal and order to the Petitioner rather he was announced order that his Departmental appeal has been dismissed but the same is available on the record of respondents and the same fact has been mention in the present appeal Para No. 7. File resubmitted for kind consideration.

21/10
2020



BEFORE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA

Muhammad Shoukat(Petitioner)

VERSUS

Inspector General of KPK etc Respondents

SERVICE APPEAL U/S IV OF SERVICE
TRIBUNAL ACT 1974

INDEX

S#	Description of documents	Annexure	Page#
1	Memo of Appeal Alongwith Affidavit, Verification		1-5
2	Copy of Medical Certificates	"A"	6-9
3	Copy of Impugned Order	"B"	10-12
4	Wakalat Nama		13

Dated: 10.10.2020

=====

Muhammad Shoukat(Petitioner)

Through;


MUSAWAR ASLAM TANOLI

Advocate High Court

**BEFORE THE HONORABLE KPK SERVICE
TRIBUNAL PESHAWAR**Appeal No. 12453 of 2020.Khyber Pakhtunkhwa
Service TribunalDiary No. 11392Dated 12/10/2020**Muhammad Shoukat S/O Jan Nisar ex warder
District Jail Abbottabad, (home address) R/O
Mohallah Beerkund, Gondan P/O Beerkund Tarlan
Tehsil and District Mansehra****(Petitioner)****Versus**

- 1. Inspector general of prisons, KP**
- 2. Superintendent Circle HQ Prison Haripur**
- 3. Superintendent |District Jail Abbottabad**

(RESPONDENTS)

Filed to-day

Registrar

**Appeal under section 4 of services tribunal act
1974, against the impugned order dated 28.7.2020,
whereby the appellant has been awarded major
penalty of removal from service, and order dated
10.9.2020, whereby the departmental appeal of
appellant was rejected.**

Prayers

**On acceptance of instant appeal the impugned
order dated 28.7.2020 and 10.9.2020 being void,
illegal against the facts and law, may kindly be set**

Re-submitted to-day
and filed.

Registrar

12/10/2020

aside and the appellant be reinstated with all back benefits.

Respectfully sheweth,

Appellant submits as under

1. That, the appellant was enrolled/appointed as a warder in respondent department on 7.10.2019.
2. That, the appellant performed his duties with great zeal and devotion to the entire satisfaction of his officer/ incharge.
3. That, on 6.4.2020 the appellant was granted leave for ten days, on the very next day on 2.4.2020 the appellant was met with motor bike accident and sustained severe injuries (copies of medical evidence are attached as annexure "A").
4. That, the appellant reported the matter to incharge (line officer) and moharar telephonically and the line officer advised the appellant to have rest at his home until he gets better in health.
5. That, after half of recovery of injuries, the appellant physically approached and reported to his line officer and Moharar where the appellant was order^d advised to go back to his home due to Covid 19 lock down.
6. That, the appellant was at his home on permitted rest, all of sudden impugned removal order dated 28.7.2020 was received, without any notice, charge sheet and statement of allegation against the appellant. (Copy is attached as annexure "B").
7. That, feeling aggrieved by the above mentioned orders the appellant filed the departmental appeal before respondent

no 1 on 28.8.2020 record is laying in office of respondent no 1. However the same was rejected on 10.9.2020 without any lawful reason.

8. That feeling aggrieved from the impugned orders the appellant filed this service appeal on the following grounds.

Grounds.

- i. That, both the impugned orders are against the law, facts, and against the principle of natural justice, hence not tenable.
- ii. That the impugned orders are against the article 10 A and 25 of constitution of Pakistan.
- iii. That appellant has been condemned unheard as no opportunity of defence or personal hearing has ever been provided to appellant.
- iv. That no charge sheet, statement of allegation, show cause notice has been issued nor any regular or fact finding inquiry has been conducted which was mandatory under the law before awarding a major penalty.
- v. That impugned orders have been issued with retrospective effects which is against the law and void orders
- vi. That the absence of appellant was not willful but due to accident and Covid 19 lock down and with obtaining permission of incharge/ line officer. Hence it does not amount to inefficiency and misconduct.
- vii. That according to rule of efficiency and discipline of 2011, it was mandatory upon the respondents to serve/ issue a notice on home address of appellant, but no such obligatory and mandatory procedure has been adopted by the respondents.

- viii. That the publication as mentioned in impugned order no 2296 dated 22.7.2020 is fake, factitious and baseless and having no effects because appellant was unaware about this fake and baseless publication, due to lock down, no one was allowed to go out from his home.
- ix. That the appellant is poor destitute and jobless, since then and the whole family of appellant is dependent upon the appellant. That the appellant seeks permission to advance other grounds during time of arguments.

PRAYER.

It is therefore humbly prayed that on acceptance of this appeal impugned orders may kindly be set aside and appellant may kindly be reinstated with all back benefits.

Dated: 10-10-2020

Shoukat
(Appellant)

Through

Musawar Aslam Tanoli
Musawar Aslam Tanoli

Advocate High Court

Verification

I, Mr. Muhammad Shoukat S/O Jan Nisar ex warder District Jail Abbottabad, R/O Mohallah Beerkund, Gondan P/O Beerkund Tarlan Tehsil and District Mansehra, do hereby verify that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this honorable court.

Dated 10-10-2020

Shoukat

Mr. Muhammad Shoukat

(Deponent)

Attested by
Naseem Din Shah
Advocate
High Court Peshawar

MUZAMIL HEALTH CENTER

Dr. Ahmad Ali

MBBS (Peshawar)

RMP (Pakistan)



ڈاکٹر احمد علی

ایم بی بی ایس (پشاور)

آر ایم پی (پاک)

Patient's Name Sholeat Sex m. Age 25 yr Date 12-4-2020

CLINICAL RECORD

B.P. 100/60.
 Temp 102.2°
 Wt: 72 kg
 Feet. Swollen.
 Red. Right Leg.
 Tenderness and
 swelling during
 H-B. 13-00
 B.S.R. 115-
 Erythro. 0.62
 Urine. 5000/white
 Report

Rx
 Streptocin - Dose 1, TID
 Normal saline 100ml qd
 Ceftriaxone 500mg Stat.
 Diclofenac 75mg Stat.
 Augmentin 625mg B.D.
 Diclofenac 75mg
 Dazifen D.S 1-0-1

Attested To Be True Copy
 Nazamuddin Shah
 RMP PAK

Bed Rest for 10 days. for
 complete Medication and nutrition.
 Report to check up and
 change to Medication for complete health.

دوبارہ معائنہ کی تاریخ
 27-4-2020
 Prescription Chit
 Invalid for Court

(17)

17/7

Results You Can Trust

کے کہ تم جانتے ہیں کہ ہر نیت کے پچھلے ایک اصول زندگی ہوتی ہے۔



MUZAMIL CLINICAL LABORATORY

ID No: 337

Name: Shoukat

Ref: Dr. Ahmad Ali

Date: 12-04-2020

Age: ***/Sex: Male

Spec: Blood

BIO-CHEMISTRY

<u>TEST</u>	<u>RESULT</u>	<u>UNITS</u>	<u>RANGE</u>
Glucose Fasting	****	Mg/dl	Newborns: Cord Blood: 63 - 158
Glucose Random	118 ✓	Mg/dl	1 hrs: 36 - 99 2 hrs: 36 - 89 5 - 14 hrs: 31 - 77 10 - 28 hrs: 46 - 81 44 - 52 hrs: 48 - 79 Children (Fasting) 1 - 6 yrs: 74 - 127 7 - 19 yrs: 70 - 100 Adults (Fasting): 70 - 110 Adults (Random): 75 - 160 Diabetic: 80 - 180

Not Valid For Court
Attested To Be True Copy
Noted in Skob
As PTC

Dr. Ashar Khan
M.B.B.S (Pb) F.C.P.S (Pak)

M. Qandeer
Medical Lab Technologist

COMPUTERIZED TEST REPORT

Not Valid For Court

Incorrect Result - Please Contact To lab within 24hrs for free repeatation any type of lab test

Mobile No: 0331-9110615 - 0300-5627766

(8)

Results You Can Trust

ہم نے سب سے بہتر اور سب سے زیادہ درست نتائج دیتے ہیں



MUZAMIL CLINICAL LABORATORY

Name: Shoukat

Lab No. 537

Ref by: Ahmad A.

Age/Sex : Male

Specimen: Blood

Date: 12/04/2020

HAEMATOLOGY

BLOOD COMPLETE PICTURE:

TEST	UNITS	RESULT	NORMAL RANGE
HBC	/cmm	6,400	4000 - 10,000
RBC	/cmm	4.49	3.80 - 5.30
Hct %	(%)	13.7	M (14 - 16) F (12 - 16)
Hgb (g/dl)	%	13.5	14 - 16
MCV	fl	93.0	80 - 100
MCH	Pg	36.3	27 - 32
MCHC	g/dl	36.7	32 - 36
Platelets	/cmm	162,000	150,000 - 450,000

DIFFERENTIAL:

Neutrophils	%	74	40 - 70
Lymphocytes	%	18	20 - 40
Monocytes	%	8	2 - 10

Attested to be True Copy
 Muzamil Clinical Laboratory
 Muzamil Khan
 Muzamil Khan

Dr. Ashar Khan
M.B.B.S (Pb) U.C.P.S (Pak)

M. Qadeer
Medical Lab Technologist

COMPUTERIZED TEST REPORT

Not Valid For Court

Incorrect Result - Please Contact To Lab within 24hrs for free consultation any time To Lab Staff

Results You Can Trust

نتیجے جو آپ کو یقین دلا سکتے ہیں

(9)



MUZAMIL CLINICAL LABORATORY

ID No: 117
Name: Sumait
Address: [illegible]

Date: 12-01-2020
Age: 33/Sec: F-Male
Spec: B.L.F

BIOCHEMISTRY

LIVER FUNCTION TESTS:

TEST	UNIT	RESULT	REFERENCE
✓ ALT	U/L	29	0-40
✓ AST	U/L	0.62	0-37

(Signature)
Attested To Be
True Copy
M. Qadeer
Medical Lab Technologist

Dr. Ashar Khan
MBBS (Pb) F.C.P.S (Pak)

M. Qadeer
Medical Lab Technologist

COMPUTERIZED TEST REPORT

Not Valid For Court

Incorrect Result? Please Contact To lab within 24hrs for free reanalysis any type of lab test

Mon No: 0331-9110615 - 0300-5637766

Dr. Ahmad Ali
MBBS (Peshawar)
RMP (Pakistan)

- T.T. In GA.
- Steeking and Dressing
- Bandage for wound
- Cheek Rest for
- encephal. hydrog. .
- Report to check up: 3 days
- and change to the Dressing.

Signed

Attested to Be
True Copy
Naseem Khan
Adv PAK

10

OFFICE OF THE SUPERINTENDENT
DISTRICT JAIL ABBOTTABAD
Ph/fax-092-9310213
districtjailabbottabad@gmail.com

No 1351 Dated 28-07-2020




To,

The warder (Probationary)
Shoukat S/O Jansar
R/O Mohallah Beerkund, Gondan P/O Beerkund Tarlan Tehsil and
District Manshra

PROBATIONARY PROCEEDING AGAINST WARDER SHOUKAT S/O
JANSAR ATTACHED TO DISTRICT JAIL ABBOTTABAD.

Memo:


Enclosed please find herewith office order No. 2296 dated 22-07-2020 (in original) of superintendent Circle (Eastern) Headquarter Prison Haripur. You have been awarded the major penalty of "REMOVAL FROM SERVICE" by the competent authority.


SUPERINTENDENT
DISTRICT JAIL ABBOTTABAD

Endst No. _____

Copy of the above is forwarded to;

1. The Superintendent Headquarter Prison Haripur with reference to above mentioned order with report that this office is still unaware regarding about of subject cited warder. Further service book in original in respect of subject cited warder is attached here for further necessary action please.
2. The DAO Abbottabad along with original office order mentioned above please.


Attested To Be
True Copy


SUPERINTENDENT
DISTRICT JAIL ABBOTTABAD

(11)

OFFICE OF THE SUPERINTENDENT
CIRCLE (EASTERN) HQ. PRISON HARIPUR

No. 2302/1
Dated 22/07/2021
Phone/Fax: 0995-920066

OBJECT ORDER:

WHEREAS, following accused Warders (WPS-17) attached to District Jail Abbottabad, were proceeded against under Rules-3 of Khyber Pakhtunkhwa Government servants (Efficiency & Discipline) Rules, 2011.

Sr	Name & Parentage	Date of Appointment	Absence Period	Report of Supt Vide No & Date	Punishment
01	Nazim Ahmed S/o Gul Ahmed	07-10-2020	From 09-11-2019 to till date	No.986 dated 21-05-2020	Removal From Service
02	Muhammad Shaukat S/o Jansif	07-10-2019	From 07-04-2020 to till date	No.1109 dated.16-06-2020	Removal From Service

AND WHEREAS, after expiry of 15 days (Fifteen) the above mentioned warders neither resume duty nor any intimation was received from them, therefore, as required under Rule#09 of ibid rules, a notice was published in daily newspapers "Daily Aaj" dated.04-06-2020 & "Daily Mashriq" Dated. 23-06-2020 respectively, by directing them to resume duty within fifteen (15) days of publication of the notices. in response of published notices they did not resumed their duties as per directions nor submit any oral or written defense/justification of their misconduct.

AND WHEREAS, the accused warders failed to offer any plausible defense against their willful absence as mentioned above and since their conduct is wholly unsatisfactory which is not condoned.

NOW THEREFORE, in exercise of powers conferred under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011, the undersigned being Competent authority, hereby awards major penalty as mentioned above.

FURTHER, their absence period from duty will be treated as "extraordinary leave without pay."

SUPERINTENDENT
CIRCLE HQ. PRISON HARIPUR

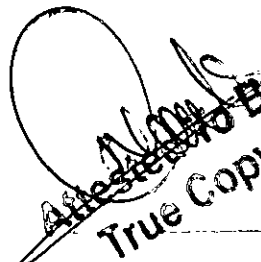
Endst: No: 2302-2302/1

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
2. The Superintendent Headquarter Prison Peshawar for information please.
3. The Superintendent District Jail Abbottabad for information with reference to the No. 986 Dated. 21-05-2020, & No. 1109 dated. 16-06-2020

Warders Concerned at their home addresses C/O Superintendent District Jail Abbottabad.

SUPERINTENDENT
CIRCLE HQ. PRISON HARIPUR


 True Copy

11-a

BETTER COPY

OFFICE OF THE SUPERINTENDENT

CIRCLE (EASTERN) HQs PRISON
HAIRIPUR

No. 2296

DATED 22/07/2020

PHONE/FAX: 0995-920066

OFFICE ORDER:

WHEREAS, following accused warders (BPS-07) attached to District Jail Abbott bad, were proceed3ed against, under rules-3 of KP government servants (E&D rules,2011.

S. No.	Name & Parentage	Date of Appointment	Absence Period	Report of supdt vide No. & date	punishment
01	Nazir Ahmed s/o Gul Ahmed	07/10/2020	From 09-11-2019 till date	No.986 dated 21-05-2020	Removal from service
02	Muhammad Shaukat s/o Jansar	07-10-2019	From 07-04-2020	No.1109 dated 16-06-2020	Removal From service

AND WHEREAS, after expiry of 15 days(fifteen) the above mentioned warders neither resume duty nor any intimation was received from them, therefore, as required under rule#09 of ibid rules, a notice was published in daily newspapers "daily aaj" dated 04/06/2020 & "Daily Mashriq" dated 23/06/2020 respectively, by directing them to resume duty within fifteen(15)days of publication of the notices. In response of published notices they did not resumed their duties as per directions nor submit any oral or written defense/justification of their misconduct.

AND WHEREAS, the accused warders failed to offer any plausible defense against their willful absence as mentioned above and since their conduct his highly unsatisfactory which is willful absence from duty their willful absence from duty for the above mentioned period stands established.

NOW THEREFORE, in exercise of powers conferred under rule-9 of Khyber pakhtunkhwa government servants (E &D) rule 2011, the undersigned being competent authority, hereby awards major penalty as mentioned above.

FURTHER, their absence period from duty will be treated as "extraordinary leave without pay."

SUPERINTENDENT

CIRCLE H.Q. PRISON HARIPUR

Endst: NO. 2297-2302

Copy of the above is forwarded to: -

1. The Inspector General of prisons KP Peshawar for information please.
2. The superintendent headquarters prison Peshawar for information please.
3. The superintendent District Jail Abbott bad for information with reference to the No.986 dated 22/05/2020 & No. 1109 dated 16-06-2020.
4. DAO Abbott bad for information and necessary action please.
5. Warders concern at their home addresses C/O superintendent District Jail Abbott bad.

SUPERINTENDENT

CIRCLE H.Q. PRISON HARIPUR



12

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

91-9210334, 9210406

091-9213445

No Estb/Ward-Orders/

32266-1

Dated

10-09-2020

ORDER

WHEREAS, **Warder Muhammad Shaukat S/O Jan Nisar** while attached to District Jail Abbotabad, was awarded the major penalty of "Removal from service" by Superintendent HQ Prison Haripur vide his order No. 2296 dated 22-07-2020 due to his willful absence from duty w.e.f 07-04-2020 to 22-07-2020.

AND WHEREAS, the said warder preferred his departmental appeal for setting aside the penalty awarded to him, which was examined in light of the available record of the case and it was observed that his appeal is badly time-barred / without any substance and penalty awarded to him by the competent authority due his willful absence from duty as referred to above after observing all legal and codal formalities as required under the E & D Rules 2011.

NOW THEREFORE, keeping in view the facts on record, the provision of rules in vogue and in exercise of power conferred under Rule-5 of Khyber Pakhtunkhwa Civil Servants Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being time barred and without any substance.

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.

ENDST.NO 32266-681.

Copy of the above is forwarded to :-

- 1 The Superintendent, Headquarters Prison Haripur for information and necessary action with reference to his Order referred to above.
- 2 The Superintendent District Jail Abbotabad for information and necessary action. He is directed to inform the appellant accordingly and to make necessary entry in his Service Book under proper attestation
- 3 Appellant, Ex Warder Muhammad Shaukat S/O Jan Nisar C/O Superintendent District Jail Abbotabad for information

[Signature]
Attested to Be
True Copy

ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR.

[Signature]
10/9/2020

S.No. 154823

Name of Advocate S. Amir Qadir

DBA NO. 690 TBA NO. 1

BC No. 15-5543



R.s.100/=

200

وکالت نامہ
S. Amir Masood
Finance Secretary
District Bar Association
Abbottabad

جناب سروس ٹریڈنگ کمپنی ایف ایم آر۔

بعدالت
عنوان: محمد شہوان
19 Prison KPK Pesh

منجانب: محمد شہوان
نوعیت مقدمہ سروس ایف ایم آر

باعث تحریر آنکھ فور

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجوہات ہی برائے پیشی یا تصفیہ مقدمہ بمقام ایف ایم آر کے لیے

S. Amir Qadir Advr Hc

کو حسب ذیل شرائط پروکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خالص رو بروعدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پشہری کے علاوہ کسی جگہ یا پشہری کے اوقات سے پہلے یا چھپے یا روز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پشہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا روز تعطیل یا پشہری کے اوقات کے آگے چھپے پیشی ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا جمانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراء کے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری برائے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر عائشی وراثتی نامہ و فیصلہ برحالت کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات از پشہر صدر اپیل و برآمدگی مقدمہ یا ہر قسم کی سختی ڈگری یا کٹرفر درخواست حکم امتناعی یا قری یا گرفتاری قبل از گرفتاری واجرائے ڈگری بھی صاحب موصوف کو بشرط ادا ایلی علیحدہ مختار بیرونی کا اختیار ہوگا۔ بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے لیے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

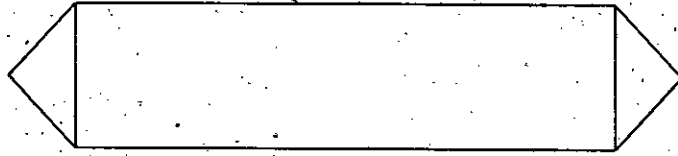
مورخہ 17/11/2021
دن / ماہ / سال

محمد شہوان
نوعیت مقدمہ سروس ایف ایم آر

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

محمد شہوان بلر جان لٹا
Prison Pesh KPK

Shah



2 منجانب
مگر شوکت بنام
IG of K.P.K.

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام ~~Musawar~~ کیلئے ~~Musawar~~ Adul Musawar

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

المرقوم 8 ماہ 10 20

العہدگی واہ العہد

کے لئے منظور ہے۔

Musawar

Musawar Adul

"A"

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

TB

No.

12453

20

APPEAL No..... of 20

Mohammad Shoukat

Appellant/Petitioner

Versus

16, of Prison K.P.K. Pesh.

RESPONDENT(S)

Counsel

Notice to Appellant/Petitioner

*Musawar Aslam Tanoli
Advocate High Court
Manshera.*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17/11/2021 7:05 AM* at

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court A Head

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

"A"

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

No.

APPEAL No. 12453 of 2020

TB

M. Shaukat

Appellant/Petitioner

Versus

19, Prison Mkt Pesh.

RESPONDENT(S)

✓
 Notice to Appellant/Petitioner

Mohammed Shaukat S/O
Jam Nisar Ex-Warder R/O
Mehallah Beerkund Gordon R/O Beerkund
Tarlan Tehsil Distt: Mansehra.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17/11/2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court A. Head

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

"B"

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

No. *Regd*

TB A1A

Appeal No. *12453* of 20*20*

Mohammad Shoukat Appellant/Petitioner

Versus

IA Prison Akh Respondent

Respondent No. *3*

Notice to: - *Superintendent Distt Jail*
Alabad

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 13-6-22* 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 *30*.....

Day of..... *5* 20 *22*

at camp court

Alabad.

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

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

“B”

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

No. *Page*

TB A/A

Appeal No. *12453* of 20*20*

Mohammad Shoukat Appellant/Petitioner

Versus

10 Prison Aish Respondent

Respondent No. *3*

Notice to: - *Superintendent Distt Jail*
A/Abad

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 *13-6-22* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this *30*.....

Day of..... *5* 20 *22*

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.

“B”

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

Regd
 No.

TB A1A

Appeal No. 12453 of 2020

Mohammad Shoukat Appellant/Petitioner

Versus

1st Prison Regl Respondent

Respondent No. 2

Notice to: Superintendent of Circle HQ
 Prison Hari Pur

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 13-6-22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 30

Day of 5 2022

at camp court
 A1A bad

[Signature]
 Registrar,

Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

No. *Regd*

TB AIA

Appeal No. *12453* of 20 *20*

Mohammad Shoukat Appellant/Petitioner
Versus

JG Prison Regl Respondent

Respondent No. *2*

Notice to: - *Superintendent of Circle HQ*
Prison Hari Pur

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 *13-6-22* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this *30*

Day of *5* *2022*

@ CNP COURT
AIABAD



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.