

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
**SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 685/2018  
Sameen Gul

..... Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa & others

..... Respondents

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Deponent

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
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Appellant

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Inspector General of Police,  
Khyber Pakhtunkhwa & others

Respondents

**REPLY TO APPLICATION FOR AMENDMENT IN SERVICE APPEAL**

Respectively Sheweth:-  
Preliminary Objections:-

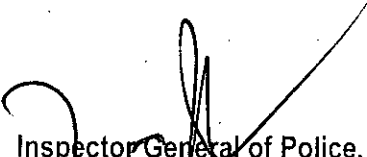
1. That the application is not maintainable in its present form.
2. That the the appeal has been material for hearing and at this belated stage the application is bad for aw / rules.

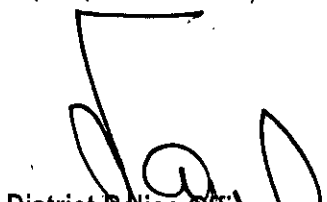
**REPLY:-**

1. No comments.
2. That the applicant / appellant was bounded to annex copy of order dated 28.02.2018, with his re-joinder, but he deliberately failed, hence at the stage the application is not maintainable.
3. Incorrect, the applicant / appellant was in knowledge of the order in question as he was informed by the dealing hand of respondent No. 3.
4. Incorrect, the applicant / appellant was knowledge of the impugned order.
5. The applicant / appellant is estopped to file the instant application for his own act, as he was fully aware of the order in question. In addition, the applicant has not filed any affidavit with his application regarding not knowing the order in question.

Keeping in view of the above, it is prayed that the application may graciously be rejected on merit.

  
Regional Police Officer,  
Kohat  
(Respondent No. 2)

  
Inspector General of Police,  
Khyber Pakhtunkhwa,  
(Respondent No. 1)

  
District Police Officer,  
Kohat  
(Respondent No. 3)

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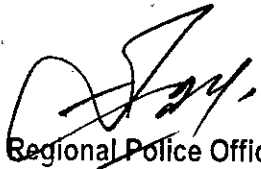
VERSUS

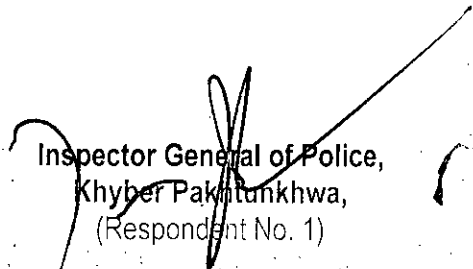
Inspector General of Police,  
Khyber Pakhtunkhwa & others

..... Respondents

COUNTER AFFIDAVIT

We, the below mentioned respondents, do hereby solemnly affirm and declare on oath that contents of parawise comments are correct and true to the best of our knowledge and belief. Nothing has been concealed from this Hon: Tribunal.

  
Regional Police Officer,  
Kohat  
(Respondent No. 2)

  
Inspector General of Police,  
Khyber Pakhtunkhwa,  
(Respondent No. 1)

  
District Police Officer,  
Kohat  
(Respondent No. 3)

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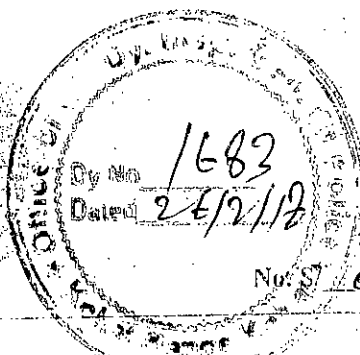
28/2/08

Attest

  
SFC  
11/11/022

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE,  
PESHAWAR.

/18, dated Peshawar the 12/02/2018.



To : The Regional Police Officer,  
Kohat Region, Kohat.

Subject: APPEAL (EX-COOK CONSTABLE SAMEEN GUL NO. 701)

Memo :

Ex-Constable Sameen Gul No. 701 of District Police Kohat had submitted appeal to the Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for reinstatement into service. His appeal was processed / examined at Central Police Office, Peshawar and filed by the competent authority being badly time barred for about 03 years and 10 months.

The applicant may please be informed accordingly.

*Plind*

(SYED ZIA ALI SHAH),

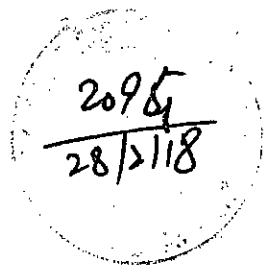
Registrar,

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

*SR*  
*22/2/18*  
*Koh*

*26/2/18*

*No. 1984 / Ee*  
*do 27/02/2018*



Dpo Kohat

For information and also  
inform the appellant concerned  
accordingly please

*Americ*

DIG POLICE  
KOHAT  
*22/2/18*

otte/SRC

To inform the above named  
Constable and mention in  
his Service Record



District Police Officer,  
Kohat

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
**SERVICE TRIBUNAL, PESHAWAR**

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Sameen Gul

Appellant

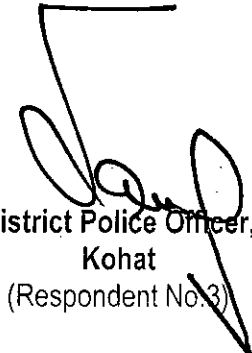
**VERSUS**

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Respondents

**AUTHORITY LETTER**

Mr. Arif Safeem steno (Focal Person) of this office is hereby authorized to file the parawise comments and any other registered documents in the Honorable Tribunal on behalf of respondents / defendant and pursue the appeal as well.

  
District Police Officer,  
Kohat  
(Respondent No. 3)