


FORM OF ORDER SHEET

Court of _____

Case No. - 1768/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/12/2022	<p>The appeal of Mr. Farman Ullah resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Farmanullah son of Muhammad Karim Inter Head Constable CCP Peshawar received today i.e. on 18.11.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Index of the appeal may be prepared according to rules.
- 2- Check list is not attached with the appeal.
- 3- Appeal has not been flagged/marked with annexures marks.
- 4- Annexures of the appeal may be attested.
- 5- Memorandum of appeal may be got signed by the appellant.
- 6- Memorandum of appeal may be supported with by an affidavit duly attested by the Oath Commissioner.
- 7- Law under which appeal is filed is not mentioned.
- 8- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 9- Five more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No. 3257 /S.T,

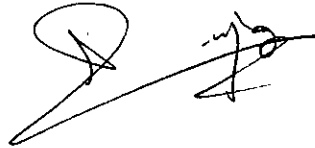
Dt. 21/11 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saadullah Khan Marwat Adv. Pesh.

Sr,

Re-submitted after making
objections.



BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. 1768 /2022

Farman Ullah

versus

C.P.O & others

I N D E X

S.#	Description of Documents	Annex	Page
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2.	Judgment dated 27-12-2002	"A"	4-6
3.	S. A. No. 04/2014 dated 24-12-2013	"B"	7-10
4.	Order dated 28-11-2018	"C"	11-12
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Appellant

Through



Saadullah Khan Marwat

Advocate

21-A, Nasir Mansion,

Shoba Bazaar, Peshawar

Ph: 0300-5872676

Dated 15-11-2022

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWARS.A No. 1768 /2022

Farman Ullah S/o Muhammad Karim,
Inter Head Constable, Capital City
Police, Peshawar. Appellant

Versus

Khyber Pakhtunkhwa
Service TribunalDiary No. 1978Dated 18-11-2022

1. Capital City Police Officer, Peshawar.
2. Provincial Police Officer, KP; Peshawar.
3. Superintendent of Police,
Hqr: Peshawar Respondents

⇄<=>⇄<=>⇄<=>⇄<=>⇄

**APPEAL AGAINST OFFICE ORDER NO. 19051 /
EC-I, DATED 19.10.2022 OF R NO. 1 WHEREBY
REPRESENTATION OF APPELLANT WAS FILED /
REJECTED FOR NO LEGAL REASON.**

Filed to-day

Registrar

18/11/22

⇄<=>⇄<=>⇄<=>⇄<=>⇄

Respectfully Sheweth:

1. That on 19-09-2000, appellant filed appeal 2202/2000 before the hon'ble Tribunal whereby appellant was dismissed from service which appeal came up for hearing on 27-12-2002 and then the hon'ble Tribunal was pleased to modify the same and major penalty of dismissal from service was converted into minor penalty of stoppage of two annual increments and reinstated him in service with all back benefits. (Copy as annex "A")

2. That on 24-12-2013, appellant filed appeal No. 04/2014 before the hon'ble Service Tribunal to select him being senior for Intermediate College Course at PTC Hangu. The said appeal came up for hearing on 28-11-2018 and then the hon'ble Tribunal was pleased to dispose of the same as by then appellant was deputed for the course to PTC Hangu. (Copies as annex "B" & "C")
2. That on 28-06-2022, appellant submitted representation before R. No. 02 to promote him to the rank of Assistant Sub-Inspector B-11 and Sub-Inspector B-14 because his colleagues were performing duties as Sub-Inspectors B-14 and to also depute / select him for Upper College Course as well as to allow him seniority as per Notification dated 12-05-2000. (Copies as annex "D" & "E")
3. That on 18-10-2022, the said representation of appellant was rejected / filed by R. No. 01. (Copy as annex "F")

Hence this appeal, inter alia, on the following grounds:-

GROUND S.

- a. That admittedly appellant was senior but due to the aforesaid minor punishment he was deprived of benefits of future carrier.
- b. That colleagues of appellant are serving the force as Sub-Inspectors B-14 but appellant as Inter Head Constable B-09.
- c. That it was the lapses of the respondents who misinterpreted the judgment of the hon'ble Service Tribunal by blocking his future carrier as per the minor punishment while minor punishment of stoppage of annual increment is no penalty in the eyes of law nor it comes in way of promotion.
- d. That appellant agitated the matter not only before respondents but also before the legal forum but due to mis-application of mind to the matter of respondents, appellant is still facing agonies.

- e. That the impugned order dated 18-10-2022 of R. No. 01 is not per the mandate of law, so requires interference and rejection.

It is, therefore, most humbly prayed that on acceptance of the appeal, the impugned order dated 18.10.2022 of R. No. 01 be set aside and appellant be awarded promotion to the rank of Sub-Inspector B-14 with his colleagues, he be allowed for mandatory course, if any, as well as seniority with all consequential benefits, with such other relief as may be deemed proper and just in circumstances of the case.

فرمان الله
Appellant

Through

سید محمد علی بہار
Saadullah Khan Marwat

Arbab Saif-ul-Kamal

Amjad Nawaz
Advocates,

Dated: 15-11-2022

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

سید محمد علی بہار
Advocate

AFFIDAVIT

I, Farman Ullah S/o Muhammad Karim, Inter Head Constable, Capital City Police, Peshawar (appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief .

فرمان الله
DEPONENT

27-12-92

BEFORE THE NWFP SERVICE TRIBUNAL, PESHAWAR.

APPEAL NO. 2202/2000

Date of Institution19-9-2000

Date of Decision..... 27-12-2002

Farmanullah (FC No.6),
S/O Mohammad Karim, R/O village Mirzai,
Kandary, Post office shabqadar, Tehsil
And District, Charsadda...

(APPELLANT)

VERSUS

1. Government of NWFP thorough Secretary, Pomer & T.A Department, Peshawar.
 2. Inspector General of Police, NWFP Peshawar.
 3. Deputy Inspector General of Police, Crimes Branch, NWFP Peshawar.
 4. Superintendent of Police, Crimes Branch, NWFP, Peshawar.
 5. D.S.P. Crime Branch, NWFP Peshawar
- (RESPONDENTS)

MR. WAQAR AHMAD SETH,
Advocate.

Mr. SULTAN MEHMOOD,
Government Pleader

For appellant
For respondents.

Mr. KHAN AKBAR KHAN
MR. MOHAMMAD SHAUKAT

CHAIRMAN.
MEMBER

KHAN AKBAR KHAN CHAIRMAN. This is a service appeal filed by appellant Farmanullah, under section 4 of the NWFP Service Tribunal Act, 1971 against the order dated 20/5/2000 passed by respondent No. 4 whereby the appellant has been dismissed from service and against the order dated 4.9.2000 passed by R.No-3 whereby his departmental appeal has been rejected.

2. Briefly stated the facts are, that the appellant while posted as FC Crimes Branch, received a charge sheet alongwith statement of allegations from respondent No. 4. (Annex A and B), to which the appellant submitted his reply (Annex-C). An enquiry was conducted and then final show cause notice was issued to the appellant, to which the appellant submitted his reply on 9-5-2000 (Annex- D & E). Finally, the appellant has been dismissed from service vide order dated 20.5.2000 of respondent No.4. (Annex-F). The appellant submitted his departmental appeal before respondent No.3 on 29-5-2000 (Annex-G), which was rejected on 4-9-2000 (Annex-H), hence the present appeal.

3. The grounds of appeal are; that the impugned order is against the principle of natural justice; that the Authorized officer has also acted on an authority in the present case; that the impugned order has been given retrospective effect; that the allegations leveled against the present appellant are totally false, incorrect and baseless and that the appellant was not given a chance to cross-examine the witnesses nor any witness was examined in the presence of the appellant. The prayer of the appellant is that on acceptance of present appeal, the impugned orders may be set aside and he may be reinstated in service with all back benefits.

4. Respondents have been served. They appeared through their respective representative/counsel, submitted reply and contested the appeal vehemently. In rebuttal, the appellant also submitted his rejoinder.

5. We have heard the arguments of the learned counsel for the appellant and P.P for the State at length and perused the record with their assistance. The perusal of record would show that the allegations against the present appellant are that while posted as MTC Crimes Branch, took the official vehicle No.A-118/NWFP to Punjab Province without the prior approval of the competent authority, loaded the same with "Atta" and while bringing the same to NWFP he was checked and detained alongwith official vehicle. An

enquiry was conducted in the matter and finally he has been dismissed from service vide the impugned order dated 20.5.2000.

6. The learned counsel for the appellant contended that during the days of occurrence, there was shortage of "Atta" in our Province and the present appellant was not bringing the same for smuggling. In fact he was bringing the Atta for himself as well as for his other colleague. He further contended that the said pick up was not under the control of appellant as he was not a driver. Actually, the vehicle was under the control of other constable/driver but no action has been taken against him and the appellant has been dismissed from service without giving him a fair chance of defence.

7. The Tribunal observes that the appellant has served the respondent department for more than 10 years with good service record, and harsh view has been taken while passing the impugned order of dismissal from service of the appellant. So the punishment awarded to him needs to be altered in order to meet the ends of justice.

8. In view of the above discussion, we accept the appeal of the appellant by modifying the impugned major penalty of dismissal from service of the appellant to that of minor penalty of stoppage of two annual increments for coming two years without commulative effect and reinstate the appellant in service with all back benefits. No order as to costs. File be consigned to the record.

ANNOUNCED
27-12-2002.

Sd/-

MOHAMMAD SHAUKAT
MEMBER

(KHAN AKBAR KHAN)
CHAIRMAN

Sd/-

Atta
by

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. 4 / 2013

Farman Ullah S/o Muhammad Karim,
Head Constable, Investigation Branch
C.P.O, Peshawar. Appellant

Versus

1. Capital City Police Officer,
Peshawar.
2. Provincial Police Officer, KPK,
Peshawar.
3. Superintendent of Police,
Headquarter, Peshawar Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**APPEAL AGAINST OFFICE ORDER NO. 19285 /
CRC, DATED 05.12.2013 OF R NO. 1 WHEREBY
APPEAL AGAINST OFFICE ORDER DATED
03.10.2013 WAS REJECTED FOR NO LEGAL
REASON AND APPELLANT, BEING SENIOR, WAS
NOT SELECTED FOR INTERMEDIATE COLLEGE
COURSE AT PTC HANGU.**

⇔<=>⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth:

1. That appellant was appointed as constable on 02.07.1991 and was serving the force to the best of his ability and to the entire satisfaction of superiors.

2. That on 12.05.2000, Deputy Inspector General of Police, Peshawar range Peshawar issued notification wherein the incumbents mentioned therein were selected for Lower School Course to P.T.C, Hangu. The name of appellant was figured at serial No. 7 but he could not be deputed to bring his name on promotion list B-1 according to the merit as by then, he was over age. (Copy as annex "A")
3. That on 20.05.2000, appellant was dismissed from service on complaint of Smuggling some bags of Atta, against which appeal was preferred before the then NWFP, Service Tribunal which was accepted on 27.12.2002. (Copies as annex "B" & "C")
4. That D.I.G of Police deputed some other constables to PTC, Hangu for acquiring course since 2003 till 2008 but appellant was ignored on the score of minor penalty of stoppage of 2 Annual Increment.
5. That appellant filed writ petition No. 1869/2009 to depute him to PTC, Hangu for training which was accepted on 02.11.2010 by the Hon'ble Court with direction to the department to depute him for training as minor penalty shall not come hurdle in this respect in his way. (Copies as annex "D" & "E")
6. That thereafter, appellant was deputed to PTC, Hangu and qualified the same vide PTC, Hangu DMC / History Sheet issued by Commandant PTC, Hangu. (Copy as annex "F")
7. That as a result of said training, appellant was promoted to the rank of officiating Head Constable, B-7 vide order dated 23.08.2012. Later on, he was confirmed in the said rank. (Copy as annex "G")

8. That on 26.08.2013, appellant submitted representation before respondent No. 1 to depute him to PTC, Hangu for Intermediate College Course but of no avail. (Copy as annex "H")
9. That on 03.10.2013, respondent No. 1 made selection for Intermediate College Course at P.T.C, Hangu of the incumbents mentioned therein and appellant, being senior, was ignored for no legal reason. (Copy as annex "I")
10. That on 22.11.2013, appellant made representation against the aforesaid Notification, received on 21.11.2013 which was rejected on 05.12.2013. (Copies as annex "J" & "K")

Hence this appeal, inter alia, on the following grounds:-

GROUND S.

- a. That it is an admitted fact that appellant is senior than the deputed Head Constables because he was appointed as such on 02.07.1991 while the deputed incumbents at Serial No. 1, on 25.06.1994, at Serial No. 2, on 17.11.1991, at Serial No. 3, on 28.12.1995, at Serial No. 4, on 28.11.1994, at Serial No. 5, on 07.11.1991, and so on.

From the aforesaid dates, it is quite clear that appellant was most senior to his junior fellows. Juniors are now serving the force as ASI / SI.

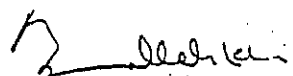
- b. That appellant was ignored time and again on minor punishment which was of no avail to department but was held time and again for ulterior motive.

- 10
- O
- c. That lapses of the department should not be attributed to appellant. Had he been deputed well within time with other colleges even with juniors, he would have completed all the requisite courses but should have been serving the department as ASI / SI by now.
- d. That by keeping in view the aforesaid facts, appellant was not only discriminated but was punished for no legal reason even for minor punishment. Such act of the respondents is based on malafide.

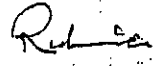
It is, therefore, most humbly prayed that on acceptance of the appeal, the impugned order dated 03.10.2013 be modified and appellant be deputed to PTC, Hangu for training for Intermediate Collage Course, with such other relief as may be deemed proper and just in circumstances of the case.

Appellants

Through


Saadullah Khan Marwat


Arbab Saif-ul-Kamal

& 
Miss Rubina Naz
Advocates,

Dated: 24.12.2013

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. 04 / 2018

Farman Ullah S/o Muhammad Karim,
 Head Constable, Investigation Branch
 C.P.O, Peshawar. Appellant

Versus

W. P. No. 1679
Dated 24-12-13

1. Capital City Police Officer,
 Peshawar.
2. Provincial Police Officer, KPK,
 Peshawar.
3. Superintendent of Police,
 Headquarter, Peshawar Respondents

U/S ~~M. of STACL~~ ~~of STACL~~ ⊕ < = > ⊕ < = > ⊕ < = > ⊕ < = > ⊕

APPEAL/AGAINST OFFICE ORDER NO. 19285 /
CRC, DATED 05.12.2013 OF R NO. 1 WHEREBY
APPEAL AGAINST OFFICE ORDER DATED
03.10.2013 WAS REJECTED FOR NO LEGAL
REASON AND APPELLANT, BEING SENIOR, WAS
NOT SELECTED FOR INTERMEDIATE COLLEGE
COURSE AT PTC HANGU.

⊕ < = > ⊕ < = > ⊕ < = > ⊕ < = > ⊕

~~stayed to stay~~

~~W. P. No. 1679~~

24/12/13

Respectfully Sheweth:

1. That appellant was appointed as constable on 02.07.1991 and was serving the force to the best of his ability and to the entire satisfaction of superiors.

~~not submitted to the~~
 J.L. Govt.

Service Appeal No. 04/2014

Date of Institution: 24.12.2013

Date of Decision: 28.11.2018

Farman Ullah

Vs

Capital City Police Officer Peshawar & 2 others.

Judgment/Order:

28.11.2018

MUHAMMAD HAMID MUGHAL, MEMBER (I) Brother of the appellant on behalf of appellant present.

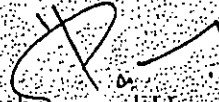
Arguments of learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney heard. File perused.

The appellant has filed the present service appeal to be deputed to PTC Hangu for training for Intermediate College Course.

During the course of arguments it was brought to the knowledge of this Tribunal that during the pendency of the present service appeal, the appellant participated in the Intermediate College Course at Police Training College Hangu. Copy of result/Notification dated 10.05.2018 regarding the result of the candidates, who appeared in the final examination of Intermediate College Course produced and the name of appellant also figures therein.

In view of above the present service appeal has become infructuous and as such the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.


(Hussain Shah)
MEMBER


(Muhammad Hamid Mughal)
MEMBER

ANNOUNCED
28.11.2018

To

The Honorable Inspector General
Of Police KPK Peshawar

Subject:

APPLICATION FOR GRANT OF SENIORITY WITH MY COLLEAGUES
VIDE NOTIFICATION NO. 3132 DATED 12-05-2000 AND WRIT PETITION
NO. 1869/2009 OF PESHAWAR HIGH COURT PESHAWAR DATED 02-11-
2010 AND TO DEPUTE ME TO PTC HANGU FOR UPPER COURSE OF SUB
INSPECTOR BPS-14:

Respected Sir,

Reference:

1. Service Tribunal judgment dated 27-12-2002 reinstated me with all back benefits.
2. Honorable High Court judgment writ petition No. 1869/2009 dated 02-11-2010.
3. IGP NWFP order No. 1248/E-II Dated 15-01-2003 to implement the judgment of service Tribunal/NWFP/Peshawar

Most respectfully, it is requested that at present I am working as IHC/ASI in District Peshawar, Police Station vest Cantt Peshawar.

My Colleagues as per Notification No. 3132 dated 12-05-2000 are getting facilities of the promotion of ASI BPS-11 and Sub-Inspector BPS-14.

1. Nisar Ahmad
2. Musharaf Khan
3. Farid Ullah
4. Habib Ullah
5. Shah Awais Khan
6. Shakir Ullah
7. Muhammad Ibrahim

Being juniors and other passed upper course and performing duty as sub inspector BPS-14 in Peshawar District. Kindly allowed me

promotion/seniority as ASI BPS-11 and select me for upper course of Sub inspector, BPS-14 in the near coming terms 2022 to PTC Hangu. It is also requested to allow me seniority as per Notification No. 3132 dated 12-05-2000 issued in our favor already. (Orders Attached)

It is therefore most humbly requested that the application be accepted as prayed for.

Thanks

Applicant

Farman Ullah S/O Muhammad Karim,

Belt No. 5204 IHC/ASI

Police Station Vest Cantt Peshawar.

Dated: 28-06-2022

Cell No. 0333-9604955

Sir,
Forwarded/ R/L

MWZ/hi

SHO/PS W. cantt

30-06-22

POLICE DEPARTMENT.

PESHAWAR RANGE.

FOR PUBLICATION IN THE N.W.F.P. POLICE GAZETTE PART-II. ORDER
BY THE DY. INSPECTOR GENERAL, OF POICE, P.R PESHAWAR.

NOTIFICATION.

Dated of PESH: the 12th May, 2000.

NO 3/32/EC, PROMOTION LIST B-I:- The following Constables of Peshawar Range including C.P.O University Campus, Peshawar have qualified B-I Examine on held by the P.T.C Hangu Authorities on 13-1-2000, at Police Lines, Peshawar. Their names are brought on promotion List B-I according to their merit.

S. No.	NAME	NUMBERS	DISTT:/UNIT,
1.	Said Rasool.	No. 3787	Peswhawar.
2.	Sana-Ullah	No. 6	=
3.	Riaz Khan	No. 1848	=
4.	Muhammad Riaz.	No3577	=
5.	Shakir-Ullah	No. 3815/5185 P	=
6.	Muhammad Khalid	No.3697.	=
7.	Farman Ullah.	No 43/CB.	=
8.	Abdul Ghafoor	No 1858	=
9.	Aurangzeb	No. 4038	=
10	Nisar Ahmad	No3977	=
11	Shabir Hussain	No 1486	=
12	Muhammad Asif	No3361.	=
13.	Abdul Nascer	No.2399	=
14	Khushnud-ul Hasan	No1040	=
15	Arshad Zaman	No. 11/40 Tr.	=
16	Fazal Hayat	No.3690	=
17.	Sajid Ahmad	No.3536	=
18	Sher Ahmad	No. 3955	=
19	Shakir-Ullah	No 4027/289 Tr.	=
20	Falak Taj	No 2611	=
21	Nazif-ur-Rehman	No. 196	=
22	Tila Muhammad	No 457	=
23	Farid Khan	No. 3575	=
24	Farid Ullah	No. 3525	=
25.	Habib-Ullah	No. 109/2864 CB	=

All others
Sub Inspector
write
A/Inspector
Head of Constable

but
not send
for lower
College train

26	Musharaf Khan	No 3990/39 CB.	=
27	Shawais Khan	No. 145	=
28	Muhammad Jan	No 56	=
29	Taj Mir Shah	No. 409	=
30	Muhammad Sher	No. 4090	=
31	Muhaamd Rafic	No 51/SB	=
32	Zardad Khan	No 3.83	=
33	Mohsin Ali	No 2305/68	=
34	Ayaz Ali	No 2555	=
35	Gulzad Khan	No 4070	=
36	Raj Wali	No 921	=
37	Sibghat Ullah	No. 3253	=
38	Javaid Khan	No. 742	=
39	Shakeel Ahmad.	No. 3716	=
40	Muhammad Javaid	No. 4041	=
41	Safdar Khan	No 3014	=
42	Abdur Rehman	No 177	=
43	Ishtiaz Khan	No 1727	=
44	Noor-Ullah	No 794	=
45	Shah Wali	No 3967	=
46	Sajid Hussain	No 3839	=
47	Saif-Ur-Rehman	No. 26/CID/199	=
48	Said Badshah	No 3964	=
49	Mosal Khan	No 3154	=
50	Waqaf Khan	No 1238	=
51	Asmat Khan	No 2822	=
52	Muhammad Ibrahim	No3093	=
53	Rehman Gul	No 95	Charsadda
54	Iftikhar Ali	No 421	=
55	Nasrullah	No 924	=
56	Said Umar	No 919	=
57	Shaukat Ali	No 130	=
58			
59	Fazal Badshah	No 305	=
60	Muhammad Israar	No 749	=
61	Niaz Ali Shah	No. 42	=
62	Naseem Jan	No 231	=
63	Tahir Khan	No. 838	=
64	Mukhtiar	No 693	=
65	Zahir Shah	No 118	=
66	Haseen Ullah	No 522	=

12
10-14

17

67	Irshad Ahmad	No 21	=
68	Umar Hayat	No. 55	=
69	Iqbal Said	No. 772	=
70	Marjan Ali	No 888	=
71	Faiz-ur-Rchman	No 91	=
72	Shakeel Ahmad	No 489	=
73	Naiksar Ali	No 588	=
74	Israr Muhammad	No.468	=
75	Nasir Khan	No 924	=
76	Jamal Shah	No 943	=
77	Hussain Khan	No 765	=
78	Bartaj Ali	No 105	=
79	Tilawat Shah	No 339	C.P.O.
80	Muhammad Diyar	No. 110	=
81	Naheed Shah	No 46	=
82	Bahdur shah	No 230	=
83	Niamat Gul	No 56	=
84	Mian Niaz Muhammad	No 293	=

(M. RAFFAT PASHA)

Deputy Inspector General of Police.
Peshawar Range Peshawar.
Phone-9210989

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

1. The Inspector General of Police NWFP, Peshawar.
2. The _____ General of Police, Crime Branch, NWFP Peshawar with two spare copies for publication in the Police Gazette Part-II.
3. The Superintendent of Police, Peshawar.
4. The Superintendent of Police Charsadda.
5. The Superintendent of Police, Nowshara.
6. The Director GPO, University Campus, Peshawar.

sd/-
(M. RAFFAT PASHA)

Deputy Inspector General of Police.
Peshawar Range Peshawar

*Attested
by*



F 18

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No: 18051 /EC-1, dated Peshawar the 18/10/2022. Telephone No. 091-9210641 Fax No. 091-9212597

To: The Asst. Inspector General of Police
Internal Accountability Branch,
Khyber Pakhtunkhwa, Peshawar.

Subject: **APPLICATION OF JNC MUHAMMAD FARMAN NO. 5204 OF
CCP, PESHAWAR.**

Memo: Please refer to your office letter no: B66-68/CPO/IAB, dated
05.07.2022 on the subject cited above.

It is submitted that as per DSP/legal opinion the service record
vis-a-vis of his alleged B1 colleagues was checked thoroughly and decided that the
application of the applicant is not maintainable and without substance and badly
time barred. He has availed the fruits of the Service Tribunal judgment. The
appellant's seniority is rightly placed with his colleagues of Intermediate College
Course as mere on the ground and of appearance and qualifying B1 examination
with Police personnel whom now serving as SI after earning promotion while
applicant lost his seniority due to his own ill conduct. Therefore, his application
filed.

M. M. Khan

For CAPITAL CITY POLICE OFFICER
PESHAWAR

بعد الت چاپ سروس طرہ پورٹل صوبہ سندھ پشاور

مستجاب ایڈوانس
فرمان اللہ بنام محکمہ کولسی
دعویٰ اپیل

باعتبار شکریہ ایٹیکہ

مقررہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور
کیسٹیم اسٹینڈ انڈسٹریز خان سرونٹے ایڈووکیٹ، ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب
موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہو گا نیز وکیل صاحب کو کرنے راہی نامہ و آقررت ثالث و تیسراہ برتلاف
دینے جواب دہی اور اقبال دعویٰ اور بھرتی و ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور مرضی دعویٰ اور درخواست
پر قسم کی تصدیق اور اس پر دستخط کرنے کا اختیار ہو گا نیز بھرتی عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور دستخطی اختیار کرنے اپیل نگران و نظر ثانی و پیروی کرنے کا اختیار ہو گا اور بھرتی ضرورت مقدمہ مذکورہ
کے کل یا بجز ویکی کاروائی کے واسطے اور وکیل یا مشارق قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہو گا
اور صاحب مقرر شدہ کو بھی وہی جملہ مندرجہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ پر وائض منظور
قبول ہو گا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے سبب ہو گا اس کے مستحق وکیل صاحب
موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہو گا اگر کوئی تاریخ پیشی مقام مذکورہ
پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ رکھ دیا کہ سند ہے۔

الرقوم 22-11-15

العبد العبد العبد

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ایڈووکیٹ

سعید اللہ خان
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امجد نواز
ایڈووکیٹ

فرمان اللہ