BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, CAMP COURT ABBOTTABAD.

Service Appeal No. 259/2018

BEFORE:	KALIM ARSHAD KHAN	---	CHAIRMAN
	FAREEHA PAUL	---	MEMBER(E)

Gulzar son of Samandar Khan SI(Police) R/o Chitri, Tehsil & District Abbottabad.

..... (*Appellant*)

VERSUS

1. Govt: of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber Pakhtunkhwa, Peshawar.
2. Govt: of Khyber Pakhtunkhwa, through Secretary Finance, Peshawar.
3. Accountant General Khyber Pakhtukhwa, Peshawar.
4. IGP Khyber Pakhtunkhwa Peshawar.
5. DIG Hazara Range, Abbottabad.
6. District Police Officer, Battagram.
7. District Accounts Office Battagram.

..... (*Respondents*)

Present:

AMANULLAH KHAN SALIK,
Advocate --- For Appellant.

SYED NASEER UD DIN,
Assistant Advocate General --- For respondents.

Date of Institution.....23.01.2018
Date of Hearing.....19.05.2022
Date of Decision 20.05.2022

JUDGMENT.

KALIM ARSHAD KHAN, CHAIRMAN:- The service appeal has been instituted under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 that order dated 12.10.2017, whereby appellant is considered for retirement attaining the upper age limit of 60 years and not considering appellant for promotion is illegal without lawful authority and ineffective upon the service right of the appellant.

02. Brief facts as per memorandum of appeal are that the appellant joined the respondent-department as Constable in the year 1976 (12.10.1976). That the promotion of the appellant was due and he moved an application for the consideration of his promotion but instead of promotion he was retired on completion of 60 years age. According to school leaving certificate as well as CNIC the date of birth of the appellant is recorded as 12.10.1958 and he had been retired on 12.10.2018 which he was retired a year prior to the date of superannuation. Feeling aggrieved, he filed departmental appeal which was not responded within the statutory period, hence, the instant service appeal on 23.01.2018.

03. Notices were issued to the respondents who submitted written replies/comments and contested of the appeal.

04. We have heard learned counsel for the appellant and Assistant Advocate General and perused the case file with connected documents thoroughly.

05. Learned counsel for the appellant contended that the appellant had not been treated according to law and rules. That the entries made in the record, retaining and maintained thereof was the sole responsibility of authorities. He prayed that appellant might be promoted to BS-16 as Inspector and might be allowed to work as regular employee of the department with all service benefits.

06. Learned Assistant Advocate General, on the other hand, submitted that the appellant could not have been promoted due to retirement from service on superannuation. That the date of birth of

the appellant was recorded in the service record is 12.10.1957 which was correct. That the change of date of birth could be allowed within two years of entry into service otherwise at this belated stage it was against law and rules and once date of birth was recorded in the service record and not questioned within stipulated period of two years, was to be considered as correct and final. This appeal is devoid of any merit may be dismissed, he concluded.

07. It is the claim of the appellant that according to school record and entries in the CNIC his date of birth was 12.10.1958 while in the service record it was wrongly written as 12.10.1957, therefore, he was to retire on 12.10.2018 instead of 12.10.2017 because he was to attain the age of 60 years on 12.10.2018. It is also his claim that before his retirement he was eligible for promotion as Inspector but was not promoted, therefore, he prayed that he might be promoted as Inspector and reinstated in service to complete the 60 years age limit on 12.10.2018. Regarding his claim that his date of birth was 12.10.1958 and wrongly entered in the service record as 12.10.1957 that is not worth consideration at this stage because the date of birth once recorded at the time of joining government service is final and no alteration in date of birth is permissible under the law after two years of entry into service. Reliance is placed on PLJ 2022 Supreme Court 6, titled "IG Balochistan and others-vs- Mohibaullah" wherein the august Supreme Court of Pakistan was pleased to hold as under:-

---R.11--Elevation to rank of DSP--Issuance of letter regarding retirement date by CPO office--Alteration in date of birth--Non-Acceptance of letter regarding alteration in date of birth--Appeal-allowed--Challenge to--date of birth once written in service

record at time of entering into service cannot be altered in my case it cannot be done after two year--Law established by this Court in cited judgments and thus Tribunal made a serious mistake of law in coming to conclusion which it did in impugned judgment--Respondent gave his date of birth at time of entering into service as 20.01.1960 and that until November, 2019 Respondent had no cavil with such entry of date of birth in record of his service--judgment of Tribunal impugned before us is not sustainable in law, being against well settled principles of law on point--Appeal allowed.

08. As regards his claim for promotion, it is contended by him that his promotion was due and he had moved an application for consideration of his promotion but instead he was considered as retired on completion of 60 years. Therefore, before he could be considered for promotion he attained the age of superannuation and thus he cannot be granted antedated promotion. This claim is also not well founded.

09. The upshot of the above discussion is that this appeal is groundless and is accordingly dismissed. Costs shall follow the event. Consign.

10. *Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal this 20th day of May, 2022.*

(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD

(FAREEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

19.05.2022 Counsel for the appellant present. Syed Naseer Ud Din, Assistant Advocate General alongwith Mr. M. Asif, Inspector for respondents present.

Arguments heard. To come up for order before D.B on 20.05.2022 at camp court Abbottabad.

(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

(Fareeha Paul)
Member(E)

20.05.2022 Counsel for the appellant present. Syed Naseer Ud Din, Khan Bandukhel, Assistant Advocate General for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, this appeal is groundless and is accordingly dismissed. Costs shall follow the event. Consign.

Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal this 20th day of May, 2022.

(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD

(FAREEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

Constitution of Pakistan--- contd.

Promotion and Transfer Rules, 1973, S.12-A--Civil Aviation Authority Service Regulation, 3.16--- Petition against retirement order---Petitioner is entitled for his all salaries and service benefits of the intervening period--- Petition allowed--- Petitioner was appointed as Chowkidar with the respondents on 16.06.1972 and at the time of induction in service, the date of birth of the petitioner was recorded in his Service Book as 02.08.1956, and according to this date of birth, the petitioner was to be retired on 02.08.2016, but this date of birth has been disputed that at the time of his induction in service, petitioner claimed eighteen (18) years old as per medical certificate and school leaving certificate, therefore, after scrutiny of record, the petitioner's date of birth was declared as 01.07.1972, and as such, the petitioner was to be retired on 01.07.2012 and according to respondents the petitioner has been retired on the said date---By merely stating in medical certificate that the petitioner was eighteen (18) years old cannot be considered as an authentic piece of evidence for determining the age of the petitioner--- Conclusion; there is no allegation that the petitioner has manipulated/tampered his date of birth in the Service Book---The petitioner has also produced the School Leaving Certificate; this certificate contained all relevant entries with regard to the petitioner---This certificate has not been challenged by the respondents---For that reason, certificate goes to be unrebutted and the entries mentioned in the said certificate are to be taken as true--- Therefore, the principle of acquiescence and waiver will come into play against the respondents---Consequently, orders issued by the respondents are set-aside having no legal effect---Since the date of retirement of the petitioner has been passed away and the petitioner has attained the age of superannuation, therefore, no question for his reinstatement in service arises at this stage---However, the petitioner is entitled for his all salaries and service benefits of the intervening period---Petition allowed. [(Muhammad Ali Mazhar and Abdul Malik Gaddi, JJ.), Farid Muhammad v. Federation of Pakistan: **SBLR 2017 Sindh 1173(c)**].

Constitution of Pakistan--- contd.

----Art. 199---Constitutional jurisdiction of High Court---Scope. Muslim Commercial Bank Ltd. v. Abdul Waheed Abro and others 2015 PLC 259 rel. [(Muhammad Ali Mazhar and Arshad Hussain Khan, JJ.), Tasawar Abbas Tanveer v. Federation of Pakistan: **2017 PLC (C.S.) Note 97(b), p.95 (Sindh High Court)**].

----Art. 199---Constitutional jurisdiction of High Court---Scope---High Court could not interfere in policy matters unless policy was arbitrary. Dossani Travels (Pvt.) Ltd. and others v. Messrs Travels Shop (Pvt.) Ltd. and others PLD 2014 SC 1 rel. [(Shahid Mubeen, J.), Muhammad Hashim Awan v. Chief Secretary Government of Punjab, Lahore: **2017 PLC (C.S.) 1085(b) (Lahore High Court)**].

----Art. 199---Constitutional jurisdiction of High Court---Deputation and repatriation of civil servants---Aggrieved persons--- Scope---Deputationist could not be treated as an "aggrieved person" because he/she had no vested right to remain on a post as deputationist forever or for a stipulated period of time and could be repatriated at any time. Dr. Shafi-ur-Rehman Afridi v. CDA, Islamabad 2010 SCMR 378 rel. [(Miangul Hassan Aurangzeb, J.), Muhammad Masroor-ul-Haq v. Federation of Pakistan: **2017 PLC (C.S.) 1365(b) (Islamabad High Court)**].

15.02.2022 Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same on 16.05.2022.

Reader

16.05.2022 Counsel for the appellant present. Mr. Muhammad Riaz Khan, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments before D.B on 19.05.2022 at camp court Abbottabad.

(Kaleem Arshad Khan)
Chairman
Camp Court Abbottabad

(Fareeha Paul)
Member(E)

[illegible]

(Kaleem Arshad Khan)
Chairman
Camp Court Abbottabad

(Fareeha Paul)
Member(E)

13.07.2021 Due to COVID-19, tour to Abbottabad has been cancelled, therefore, case to come for the same as before on 15.10.2021.

Reader

15.10.2021 Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Appellant seeks adjournment on the ground that his counsel is not available today. Case to come up for arguments on 30.11.2021 before the D.B at Camp Court Abbottabad.

(Salah-Ud-Din)
Member (Judicial)
Camp Court A/Abad

Chairman
Camp Court A/Abad

30.11.2021 Learned counsel for the appellant present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 15.02.2022 before the D.B at Camp Court Abbottabad.

(Salah-ud-Din)
Member (J)
Camp Court Abbottabad

Chairman
Camp Court Abbottabad

Due to COVID-19 case is adjourned to 16.03.2021

Reader

16.03.2021 Learned counsel for the appellant present.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Muhammad Asif Inspector and Naseeb Khan Section Officer for respondents present.

Representative of respondents submitted written reply/comments which is placed on file. To come up for rejoinder if any, and arguments on 13/7/2021 before D.B at Camp Court, Abbottabad.

(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad

20.01.2020 Clerk to counsel for the appellant present. Written reply not submitted. Muhammad Asif Inspector representative of the respondent department present and seeks time to furnish reply. Granted. To come up for reply/comments on 17.02.2020 before S.B at Camp Court Abbottabad.

Member
Camp Court, Abbottabad

Due to covid ,19 case to come up for the same on 16/ 4 / 20 at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on 10 / 20 / 20 at camp court abbottabad.

Reader

20.10.2020 Appellant in person present

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Muhammad Asif Inspector for respondents present.

Written reply was not submitted on behalf of respondents. Representative of respondents requests for adjournment in order to furnish reply/comments; granted. To come up for written reply/comments on 15.12.2020 before S.B at Camp Court, Abbottabad.

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

23.10.2019 Counsel for the appellant present. Mr. Usman Ghani, District Attorney present. Comments were called from respondent No. 6/DPO Battagram, however, the same are still awaited. Fresh notice be issued to respondent No. 6/DPO Battagram to furnish on the next date reply before S.B. Adjourn. To come up for preliminary hearing on 21.11.2019 before S.B at Camp Court, Abbottabad.

Member
Camp court, A/Abad

21.11.2019 Appellant with counsel present. Heard.

The present service appeal was instituted on 23.01.2018 however the same is lingering on at the stage of preliminary hearing until yet as the respondent No.6 has not submitted reply. In the circumstances of the case and in the interest of justice, the present service appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security & process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 20.01.2020 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee
26/11/19

Member
Camp Court, A/Abad

10.07.2019 Counsel for the appellant present and requested for adjournment. Adjourned to 19.08.2019 for preliminary hearing before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

19.08.2019 Appellant with counsel present. Notice be issued to respondent No.6 for 21.10.2019. Adjourn. To come up for preliminary hearing on the date fixed before S.B at Camp Court Abbottabad.

Member
Camp Court A/Abad

21.10.2019 Appellant present in person. Counsel for the appellant is not present due to general strike of the bar. Appellant requested for adjournment. Adjourn. To come up for preliminary hearing on 23.10.2019 at Camp Court, Abbottabad.

Member
Camp court, A/Abad

17.02.2019 Counsel for the appellant present and requested for adjournment. Adjourned to 16.04.2019 for preliminary hearing before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

16.04.2019 Appellant in person present.

On 18.09.2018 and 17.01.2019 comments were called from respondent No. 6/DPO Battagram. The record, on the other hand, indicates that the said respondent was not issued any notice for the purpose. Requisite notice shall positively be sent to respondent No. 6 for filing of comments on next date of hearing.

Adjourned to 21.06.2019 for preliminary hearing before S.B at camp court, Abbottabad.

Chairman
Camp court, A/Abad

21.06.2019 Appellant in person present.

Appellant requests for adjournment as his learned counsel has proceeded to appear in the courts at Battagram. Adjourned to 10.07.2019 before S.B at camp court, Abbottabad. Respondent No. 6 shall be again sent notice for submission of comments on the next date.

Chairman
Camp Court, A/Abad

18.09.2018 Appellant Amanullah Salik, Advocate present and heard. Comments be called from DPO i.e. respondent No. 6. To come up for preliminary hearing on 14.11.2018 before S.B at camp court, Abbottabad.

Chairman
Camp court, A/Abad

14.11.2018 Appellant in person present. Due to retirement of the Hob'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 17.01.2019 at camp court Abbottabad.

Reader
A/Abad

17.01.2019 Learned counsel for the appellant present. Comments be called from DPO i.e. respondent No.6. Adjourn. To come up for preliminary hearing on 18.02.2019 before S.B at Camp Court Abbottabad.

Member
Camp Court A/Abad

Form-A

FORMOF ORDERSHEET

Court of_____

Case No. **259/2018**

S.No.	Date of order proceedings	Order or other proceedings with **signature** of judge
1	2	3
1	23/02/2018	The appeal of Mr. Gulzar resubmitted today by post through Mr. Amanullah Salik Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please. REGISTRAR
2-	26-2-18	This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up there on 20-04-18. CHAIRMAN
3.	20-4-18	None present for the appellant. Adjourned. To come up for preliminary hearing on 20-7-18 at camp court, Abbottabad. Chairman Camp Court, A/Abad.

20.07.2018

Gulzar appellant in person present and submitted application for adjournment on the ground that his counsel has gone to Battagram with further request to fix a date which may not fall on Friday or Saturday. The application as well as request are allowed. Case is adjourned to 18.09.2018 before before S.B at camp court, Abbottabad.

Chairman
Camp Court, A/Abad

18.09.2018

Appellant [illegible] Ahmad, Advocate present. [illegible] Muhammad Suleman, [illegible] along with Mr. Usman Ghani, District attorney for the respondents present. Arguments could not be heard. A copy of the enquiry report has not been provided to the appellant for which he would approach the competent authority before the next date. Representative of the respondents is also directed to bring the entire record of enquiry on the next date of hearing for consideration. Adjourned to 13.11.2018 [illegible] S.B at camp court, Abbottabad.

Chairman
Camp court, Abbad

Marat

This is an appeal filed by Mr. Gulzar today on 23/1/2018 against the orders dated 12.10.2017 against which he preferred/made a departmental appeal dated 16.11.2017 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action.

No. 181 /S.T,

Dt. 24/01 /2018

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amanullah Salik Adv.
High Court Abbottabad.

Resubmitted after attending & removing the objection, when the same was received back in this office 1.1.2018

21/2/2018

16.11
16.12 - 1
16.1 2
16 2 - 3

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 259 /2018

Gulzar son of Samandar Khan S.(P.d) R/o Chitri, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

...APPELLANT

Through;

Dated: 19-1 /2018

(Amanullah Khan Salik)
Advocate High Court,
Abbottabad

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 259 /2018

Gulzar son of Samandar Khan SI(Pol) R/o Chitri, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Peshawar.
2. Govt. of Khyber Pakhtunkhwa through Secretary Finance, Peshawar.
3. Accountant General Khyber Pakhtunkhwa Peshawar.
4. IGP Khyber Pakhtunkhwa Peshawar.
5. DIG Hazara Range, Abbottabad.
6. District Police Officer, Battagram.
7. DAO Battagram.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974, THAT ORDER DATED 12/10/2017, WHEREBY APPELLANT is

CONSIDERED FOR RETIREMENT ATTAINING THE UPPER AGE LIMIT OF 60 YEARS AND NOT CONSIDERING APPELLANT FOR PROMOTION IS ILLEGAL WITHOUT LAWFUL AUTHORITY AND INEFFECTIVE UPON THE SERVICE RIGHTS OF THE APPELLANT.

PRAYER: ALLOWING THIS APPEAL, APPELLANT BE PROMOTED AS INSPECTOR AND BE REINSTATED TO COMPLETE AGE LIMIT ON 12/10/2018 INSTEAD OF 12/10/2017 AND WITH ALL ANCILLARY BACK BENEFITS.

Respectfully Sheweth;-

This appeal mainly proceeds on the following factual and legal grounds, inter-alia, amongst others;-

1. That, petitioner joint Govt. Service as Constable in Police Department in the year 1976 (12/10/1976).

2. That, all during the length/period of his service, he rendered spotless, splendid service and always

added to the prestige and dignity of the department. Neither any complaint is ever lodged nor entertained, nor any adverse action is ever initiated against the appellant.

3. That, while promotion of the appellant was due, appellant moved application for, the consideration of his promotion but instead appellant has considered retired on completion 60 years service. Copy of application is annexed as .....***Annexure "A"***.

4. That, according to school leaving certificate and school record itself, date of birth of the appellant is 12/10/1958. Copies of school leaving certificate and school record are annexed as .....***Annexure "B" & "C"***.

5. That, appellant holds manual (old) and computerized (New) National Identity Card and according to these documents also the date of birth of the appellant is 12/10/1958. Copies of old and new NICs are annexed as .....***Annexure "D"***.

6. That appellant placed on record yet another application to remind the high-ups of his grievance, reply whereof received couple of days earlier. Copies of application and reply thereof are annexed as .....***Annexure "E" & "F".***

7. That then appellant had made representation/ departmental appeal, which is still pending but reply to reminder reflects the intention of the concern authorities, hence this appeal. Copy is departmental appeal is annexed as .....***Annexure "G".***

GROUNDS;-

It is in this back ground, appellant beg to solicit as under;-

(a) That, act of authorities is against, law and facts born on record.

(b) That, entries made in the record, retaining and maintained thereof was the sole responsibility of authorities and appellant did not know this fact till final moment.

(c) That, when appellant on the strength of NIC entries coupled with the date of birth maintained, contained and retained in the school record and pursuant to tentative list on page 15 put his case for promotion, then through the action of the authorities, appellant knew and learnt that his date of birth is entered as 12/10/1957 erroneously, against the actual and factual date of birth as 12/10/1958.

(d) That date 12 month Oct, first three digits of the year 195 are the same, and the only figure controverted is 7 or 8. The former is supported by documentary evidence of annexure "C", "D" & "E" while the latter is a wrong entry never supported by any other record.

(e) That circumstance to lead to the strongest presumption that by human mistake digit 7 is recorded instead, digit, 8 more-so quit contrary to the record since early 50s can never be manufactured, fabricated or manipulated in any manner.

(f) That in view of the service record and on the face of it the documentary evidence (NIC & SLC) and in absence any thing like forced retirement or medical grounds, appellant is eligible for promotion and retirement orders are against law and facts and ineffective upon the right of the appellant.

(g) That valuable rights of the appellant have been ignored and desisted by the authorities for no good reasons and needless to say for any justification.

It is, therefore, humbly prayed that appellant be first promoted to scale 16 as inspector, and simultaneously be allowed to work as regular employee

of the department with all service benefits all during this since 12/10/2017 till 12/10/2018 save the allowed/granted extension thereof and the retirement order dated 12/10/2017 be struck down as illegal and against facts.

...APPELLANT

Through;

Dated: 19-01 /2018

(Amanullah Khan Salik)
Advocate High Court,
Abbottabad

VERIFICATION;-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal

...APPELLANT

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2018

Gulzar son of Samandar Khan SJ(Pldi) R/o Chitri, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Gulzar son of Samandar Khan SJ(Pldi) R/o Chitri, Tehsil & District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

DEPONENT

9

Phone No. 0992-9310021
Fax No. 0992-9310023

From: The Regional Police Officer,
Hazara Region Abbottabad

To: The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

ANNEXURE A

No. 24131 /E, Dated Abbottabad the, 18/10 /2017.

Subject:- **APPLICATION.**

Memorandum:

Enclosed kindly find herewith an application in respect of SI Gulzar Khan No.H/144 of Battagram District for promotion as officiating Inspector for further action please.

Regional Police Officer
Hazara Region Abbottabad

No. 24132 /E,

Copy of above is forwarded to District Police Officer, Battagram for information w/r to his office Memo: No.8916 dated 05-10-2017.

Regional Police Officer
Hazara Region Abbottabad
(AEC Dilawar)

Attested
A.K. Salih (Advocate)
BATTAGRAM

10

OFFICE OF THE DISTRICT POLICE OFFICER BATTAGRAM
Ph. # 0997-310036 / 0997-310071
Fax # 0997-311616
E-Mail: batpolice@yahoo.com

No: 8916 /, Dated 05 / 10 /2017.

To, **The:** Regional Police Officer,
Hazara Region Abbottabad

Subject: **APPLICATION**

MEMORANDUM:

Enclosed kindly find herewith an application in respect of SI Gulzar Khan No. 144/H of this district for your kind consideration, please.

District Police Officer,
Battagram.

Attested
A.R.Salik (Advocate)
BATTAGRAM

بحضور جناب پراونشل پولیس آفیسر صاحب صوبہ KPK پشاور

عنوان: اپیل ترقیاتی بہ عہدہ انسپکٹر

جناب عالی!

سائل ذیل عرض گزار ہے۔

نمبر 1: یہ کہ سائل عرصہ طویل سے محکمہ پولیس میں اپنی فرائض بنفس نفیس نہایت دیانتداری اور خوش اسلوبی سے سرانجام دیتا چلا آ رہا ہے۔ عرصہ ملازمت کیدوران سائل نے ہر محکمہ کے عزت، خود اور وقار کو بلند رکھنے کی ہر ممکن کوشش کی ہے کبھی بھی لاپرواہی اور حکم عدولی نہیں کی ہے۔ اسی طرح اپنے سینئر کے ہر جائز حکم کی تعمیل تعمیل میں جہاں تک ممکن ہو سکتا ہے۔ لائق عمل اختیار کی ہے بلکہ کوشش رہی ہے۔ تاکہ آفسران بالا کو شکایت کا موقع نہ ملے۔

نمبر 2: یہ کہ سائل نے ایم کورس PTC سیشن کورس میں پاس کیا ہے۔ مورخہ 2015 میں ایم کورس پاس کرنے کے بعد آفسران بالا نے ترقیاتی فرمائش سائل کو بحوالہ نوٹیفکیشن نمبر 2587/E III 23.6.16 F کیٹیگری پر لایا ہے۔ کافی عرصہ گزر چکا ہے۔

Attested
A.K. Salik (Advocate)
PATHGRAM

نمبر 3: یہ کہ سائل نے متعلقہ مطلوبہ کورسیز پاس کئے ہیں۔ اور آج کل SI کورس پروگرام کے تربیت میں ہیں۔ متعلقہ کورسیز وغیرہ اس کے کارڈ ہیں۔

نمبر 4: یہ کہ سائل 12 اکتوبر سال 2016 سے 60 سالہ عمر پورا ہونے پر ملازمت سے ریٹائر ہو رہا ہے۔ محکمہ پولیس کے عرصہ طویل میں کافی قربانیاں دی سائل مالی لحاظ سے کمزور ہے۔ محکمہ پولیس میں تقریباً 14 سال سروس کی ہے آخری مراحل میں سائل آفسران بالا سے ترقیاتی کا خواہاں ہے۔

نمبر 5: یہ کہ سائل کا ماضی بے داغ ہے۔ تحریری مالی حالت بھی

② 12

قابل رحم ہے۔

لہٰذا ملتجیانہ استدعا ہے کہ طاہرت اور واقعات بالا کے پیش نظر سائل کے حال پر رحم فرما کر تحت ضروری کے بنا پر سائل کو موجودہ حالت پر سیشن کورٹ میں بمعیاد الشرائط مقدمات فرمانے کے احکامات جاری فرما کر مشکور فرماویں۔ سائل تاحیات دعا گو رہے گا۔

العارض

سائل گلزار ولد H-144/51 ساکن موضع و تحصیل بٹگرام

المرقوم 04/2017

Attested
A.K.Salik (Advocate)
BATTAGRAM

Sir
Forwarded
DSP. Battagram
4/2/17

13

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

No. 821 / CPB, dated Peshawar the 5 / 10 / 2017

To:- The Addl: Inspectors General of Police, Special Branch, Elite Force, Investigation and Operations Khyber Pakhtunkhwa, Peshawar.
The Capital City Police Officer, Peshawar.
The Deputy Inspectors General of Police, Enquiry & Inspections, CTD, Telecommunications, Traffic, Finance and Training, Khyber Pakhtunkhwa, Peshawar.
The Regional Police Officers, Mardan, Hazara, Malakand, Kohat, Bannu and D.I. Khan Regions.
The Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
The Commandant, Police Training College, Hangu.
The Assistant Inspectors General of Police Legal & BDU, Khyber Pakhtunkhwa.
The Director, CPC, Khyber Pakhtunkhwa, Peshawar.
The Director, FSL, Khyber Pakhtunkhwa, Peshawar.
The Deputy Supdt: of Police, PQR, Khyber Pakhtunkhwa, Peshawar.

Subject: **INFORMATION REGARDING SUB-INSPECTORS (BS-14) ALREADY ON LIST "F"**

Memo:-

Please furnish the following information/documents regarding Sub-Inspectors (BPS-14) already on List "F" serving in your Regions/Units immediately:-

i. Present posting.
ii. Five years complete ACRs (From 2012 to 2016)
iii. No Departmental Enquiry Certificates
iv. Detail of Punishment, if any
v. As per Standing Order No. 21/2014, detail of posting period as Sub-Inspector in Investigation Branch, CTD, Special Branch, FRP, Police Training Institution, Elite Force & Central Police Office.
vi. Detail of nine (09) marks as per Standing Order No. 3/2015 and amended Police Rules 19.25A, dated 16.03.2017.

Attested
A.E.Salih (Advocate)
BATTAGRAM

S.NO	NAME & NO.	REGION
1.	SI Saeedullah No. 385/M	Malakand
2.	SI Akhtar Ali No. 50/M	Malakand
3.	SI Bahar Ali No. MR/18	Mardan
4.	SI Allah Nawaz No. D/29	D.I.Khan
5.	SI Sajawal Khan No. D/39	D.I.Khan
6.	SI Abdul Latif No. D/38	D.I.Khan
7.	SI Bashir Hussain No. D/33	D.I.Khan
8.	SI Muhammad Nawaz No. D/41	D.I.Khan
9.	SI Muhammad Nawaz No. D/36	D.I.Khan
10.	SI Sabir Shah No. D/32	D.I.Khan
11.	SI Allah Dad No. D/40	D.I.Khan
12.	SI Shama Jan No. D/31	D.I.Khan
13.	SI Ghulam Yasin No. D/35	D.I.Khan
14.	SI Faiz Kaleem No. D/34	D.I.Khan
15.	SI Zahoor Muhammad No. MR/121	Mardan

16.	SI Muhammad Nawaz No. MR/120	Mardan
17.	SI Khalid Khan No. P/335	CCP, Peshawar
18.	SI Muhammad Rasheed No. P/338	CCP, Peshawar
19.	SI Badan Khan No. P/394	CCP, Peshawar
20.	SI Razd Ali No. P/339	CCP, Peshawar
21.	SI Jan Muhammad No. P/342	CCP, Peshawar
22.	SI Murad Ali No. P/343	CCP, Peshawar
23.	SI Sabz Ali No. P/344	CCP, Peshawar
24.	SI Gulzar Khan No. P/346	CCP, Peshawar
25.	SI Shah Nawaz No. P/348	CCP, Peshawar
26.	SI Ihsan Ullah No. P/349	CCP, Peshawar
27.	SI Shah Jehan No. P/350	CCP, Peshawar
28.	SI Liaqat Ali No. P/351	CCP, Peshawar
29.	SI Behramand No. P/397	CCP, Peshawar
30.	SI Sajawal Khan No. P/353	CCP, Peshawar
31.	SI Jangraiz Khan No. P/398	CCP, Peshawar
32.	SI Murad Ali No. P/354	CCP, Peshawar
33.	SI Muhammad Noor No. P/355	CCP, Peshawar
34.	SI Inam Ullah No. P/356	CCP, Peshawar
35.	SI Maqbali Khan No. P/357	CCP, Peshawar
36.	SI Ihsan Ullah No. P/358	CCP, Peshawar
37.	SI Fazle Subhan No. P/359	CCP, Peshawar
38.	SI Karam Elahi No. P/360	CCP, Peshawar
39.	SI Khadim Shah No. P/399	CCP, Peshawar
40.	SI Noor Muhammad No. P/361	CCP, Peshawar
41.	SI Hidayat-ur-Rehman No. P/362	CCP, Peshawar
42.	SI Anwar Ali No. P/363	CCP, Peshawar
43.	SI Khushdil Khan No. P/364	CCP, Peshawar
44.	SI Mukhtiar Muhammad No. P/365	CCP, Peshawar
45.	SI Namdar Khan No. P/366	CCP, Peshawar
46.	SI Abdur Rashid No. P/367	CCP, Peshawar
47.	SI Mushtaq Ali No. P/368	CCP, Peshawar
48.	SI Khan Ghalib No. P/369	CCP, Peshawar
49.	SI Azeem Khan No. P/370	CCP, Peshawar
50.	SI Jan Alam No. P/401	CCP, Peshawar
51.	SI Jehanzeb No. P/371	CCP, Peshawar
52.	SI Ashfaq Alam No. P/372	CCP, Peshawar
53.	SI Aziz Ullah No. P/373	CCP, Peshawar
54.	SI Musa Khan No. P/374	CCP, Peshawar
55.	SI Islah-ud-Din No. P/375	CCP, Peshawar
56.	SI Behroz Khan No. P/402	CCP, Peshawar
57.	SI Amir Muhammad No. P/403	CCP, Peshawar
58.	SI Imdad Ullah No. P/376	CCP, Peshawar
59.	SI Irshad Ali No. P/377	CCP, Peshawar
60.	SI Ismail Shah No. P/378	CCP, Peshawar
61.	SI Muhammad Naeem No. P/379	CCP, Peshawar
62.	SI Muhammad Javed No. P/380	CCP, Peshawar
63.	SI Javed Iqbal No. P/381	CCP, Peshawar
64.	SI Farhad Hussain No. P/ 382	CCP, Peshawar
65.	SI Zafar Ali No. P/383	CCP, Peshawar
66.	SI Ali Jan No. P/404	CCP, Peshawar
67.	SI Murad Ali No. P/405	CCP, Peshawar
68.	SI Zahir Shah No. P/384	CCP, Peshawar
69.	SI Qeemat Gul No. P/385	CCP, Peshawar
70.	SI Gul Shed No. P/386	CCP, Peshawar
71.	SI Syed Rokhan Shah No. P/387	CCP, Peshawar
72.	SI Khushal Khan No. P/388	CCP, Peshawar
73.	SI Himayat Ullah No. P/389	CCP, Peshawar

74.	SI Bakht Diyan No. P/390	CCP, Peshawar
75.	SI Hafeez-ur-Rehman No. P/391	CCP, Peshawar
76.	SI Akhtar Naseer No. P/392	CCP, Peshawar
77.	SI Ghazi Khan No. H/143	Hazara
78.	SI Gulzar No. H/144	Hazara
79.	SI Imtiaz Ahmad No. H/146	Hazara
80.	SI Riasat Khan No. H/148	Hazara
81.	SI Muhammad Sadiq Shah No. H/149	Hazara
82.	SI Shabir Ahmed No. H/150	Hazara
83.	SI Sajid Nawaz No. H/151	Hazara
84.	SI Muhammad Javed No. H/152	Hazara
85.	SI Muhammad Arif No. H/153	Hazara
86.	SI Salih Muhammad Khan No. MR/122	Mardan
87.	SI Bagh-e-Haram No. 48/M	Malakand
88.	SI Zahir Shah No. 483/M	Malakand
89.	SI Nowsherawan No. 167/M	Malakand
90.	SI Rehad Ali No. MR/123	Mardan
91.	SI Fazal Miraj No. MR/124	Mardan
92.	SI Nooran Shah Khan No. MR/126	Mardan
93.	SI Muhammad Akbar No. MR/127	Mardan
94.	SI Imrad Ali No. MR/129	Mardan
95.	SI Ahmad Ali No. MR/132	Mardan
96.	SI Sultan Mehmood No. MR/130	Mardan
97.	SI Raza Khan No. MR/131	Mardan
98.	SI Bakhtaj Khan No. MR/128	Mardan
99.	SI Ali Hassan No. K/26	Kohat
100.	SI Mohib Ullah No. K/29	Kohat
101.	SI Mir Atlas No. K/63	Kohat
102.	SI Wali Sher No. K/66	Kohat
103.	SI Gul Faraz No. K/79	Kohat
104.	SI Ghulam Rasool No. K/80	Kohat
105.	SI Sami Ullah No. K/81	Kohat
106.	SI Naimat Ullah No. K/96	Kohat
107.	SI Asal Khan No. K/101	Kohat
108.	SI Nasrullah No. K/105	Kohat
109.	SI Muhammad Iqbal No. K/106	Kohat
110.	SI Nazir Muhammad No. K/130	Kohat
111.	SI Sakhi ur Rehman No. K/06	Kohat
112.	SI Naeem Ullah No. K/02	Kohat
113.	SI Abdul Saeed No. K/70	Kohat
114.	SI Amir Sultan No. K/76	Kohat
115.	SI Khan Ullah No. K/144	Kohat
116.	SI Abdur Rehman No. K/149	Kohat
117.	SI Dost Muhammad No. K/154	Kohat
118.	SI Kirman Ali No. K/156	Kohat
119.	SI Aman Ullah No. K/158	Kohat
120.	SI Razi Gul No. K/07	Kohat
121.	SI Gul Shah Baraz No. K/162	Kohat
122.	SI Habib ur Rehman No. K/166	Kohat
123.	SI Javed Hussain No. K/170	Kohat
124.	SI Akhtar Ali No. B/40	Bannu
125.	SI Minhaj Sikandar Yar No. D/9	D.I.Khan
126.	SI Ebad Wazir No. D/11	D.I.Khan
127.	SI Zahid Ali No. MR/134	Mardan
128.	SI Sakhawat Shah No. MR/135	Mardan
129.	SI Bakht Shed No. MR/137	Mardan
130.	SI Amir ud Din No. MR/138	Mardan
131.	SI Nigah Hussain No. MR/139	Mardan

Attested
A.K.Salih (Advocate)
BATTAGRAM

132.	SI Mira Khan No. MR/140	Mardan
133.	SI Habib Khan No. MR/141	Mardan
134.	SI Abdul Baseer No. MR/142	Mardan
135.	SI Muhammad Fazil No. MR/143	Mardan
136.	SI Muhammad Adnan No. D/37	D.I.Khan
137.	SI Naqeeb Ullah No. D/42	D.I.Khan
138.	SI Muhammad Ramzan No. D/44	D.I.Khan
139.	SI Saleem Pervez No. D/06	D.I.Khan
140.	SI Said Marjan No. D/43	D.I.Khan
141.	SI Kashif Sattar No. D/15	D.I.Khan
142.	SI Muhammad Alamgir No. D/05	D.I.Khan
143.	SI Naimat Ullah No. K/96	Kohat
144.	Sharifullah No. D/12	D. I. Khan
145.	SI Akbar Ali No. 204/MR	Mardan
146.	SI Habibullah No. 395/M	Malakand
147.	SI Abdul Wakeel No. 259/M	Malakand
148.	SI Amanullah No. 141/M	Malakand
149.	SI Habib ur Rahman No. 396/M	Malakand
150.	SI Umar Khitab No. 399/M	Malakand
151.	SI Shah Jabbar No. 414/M	Malakand
152.	SI Fazal Karim No. 32/M	Malakand
153.	SI Zewar Khan No. 66/M	Malakand
154.	SI Mir Azam No. 92/M	Malakand
155.	SI Juma Rahman No. 210/M	Malakand
156.	SI Riaz Muhammad No. 467/M	Malakand
157.	SI Sultan Khan No. 37/M	Malakand
158.	SI Abdul Qayum No. 206/M	Malakand
159.	SI Amir Bahadar No. 370/M	Malakand
160.	SI Abdul Aziz No. 489/M	Malakand
161.	SI Iqbal ud Din No. 492/M	Malakand
162.	SI Faiz Mohammad No. 500/M	Malakand
163.	SI Bakht Zahir No. 207/M	Malakand
164.	SI Jameel ud Din No. 520/M	Malakand
165.	SI Noor Baz Khan No. 540/M	Malakand
166.	SI Muhammad Khalid No. 543/M	Malakand
167.	SI Muhammad Wali Shah No. 544/M	Malakand
168.	SI Wajid Shah No. 357/M	Malakand
169.	SI Qurban Khan No. 553/M	Malakand
170.	SI Sherin Zada No. 212/M	Malakand
171.	SI Rahim Khan No. 622/M	Malakand
172.	SI Younas Rahman No. 674/M	Malakand
173.	SI Gul Zamin No. 159/M	Malakand
174.	SI Muhammad Tawheed No. 111/M	Malakand
175.	SI Imran Khan No. 113/M	Malakand
176.	SI Javid Iqbal No. 147/M	Malakand
177.	SI Bakht Zada No. 94/M	Malakand
178.	SI Habib Said No. 163/M	Malakand
179.	SI Hayat Ali Shah No. 153/M	Malakand
180.	SI Mian Said Jamal No. 53/M	Malakand
181.	SI Ijaz Ahmad No. 73/M	Malakand
182.	SI Ghani ur Rehman No. 157/M	Malakand
183.	SI Muhammad Sayar No. 154/M	Malakand
184.	SI Khan Bahadar No. 708/M	Malakand
185.	SI Sher Akbar No. 417/M	Malakand
186.	SI Ihsanullah No. 365/M	Malakand
187.	SI Muhammad Nazak No. H/31	Hazara
188.	SI Gohar Rehman No. H/45	Hazara
189.	SI Ali Asghar No. H/110	Hazara
190.	SI Majid Naseem No. H/111	Hazara

191.	SI Abdul Waheed No. H/112	Hazara
192.	SI Muhammad Sajjad No. H/117	Hazara
193.	SI Muhammad Javed No. H/138	Hazara
194.	SI Khan Afsar No. H/139	Hazara
195.	SI Naveed Ahmed No. H/140	Hazara
196.	SI Gohar Wakeel No. H/154	Hazara
197.	SI Saeed-ur-Rehman No. H/155	Hazara
198.	SI Muhammad Saeed No. H/156	Hazara
199.	SI Abdul Rashid No. H/157	Hazara
200.	SI Waris Khan No. H/158	Hazara
201.	SI Muhammad Anwar No. H/159	Hazara
202.	SI Muhammad Bashir No. H/160	Hazara
(203.)	SI Muhammad Javed No. H/161	Hazara
204.	SI Andaz Khan No. 99/MR	Mardan
205.	SI Sher Nawas Khan No. 157/MR	Mardan
206.	SI Bashir Ahmad No. 237/MR	Mardan
207.	SI Muhammad Zaman No. 103/MR	Mardan
208.	SI Atta-ur-Rehman No. 195/MR	Mardan
209.	SI Abdul Sajid No. 06/MR	Mardan
210.	SI Bakht Sher Bacha No. 284/MR	Mardan
211.	SI Sajjad Ali No. 32/MR	Mardan
212.	SI Ashiq Hussain No. 92/MR	Mardan
213.	SI Namir Khan No. 195/MR	Mardan
214.	SI Umar Daraz Khan No. 51/MR	Mardan
215.	SI Tariq Umar No. P/21	CCP, Peshawar
216.	SI Muhammad Nawaz No. P/22	CCP, Peshawar
217.	SI Darwesh Khan No. P/24	CCP, Peshawar
218.	SI Abdul Ghaffar No. P/25	CCP, Peshawar
219.	SI Muhammad Gul No. P/26	CCP, Peshawar
220.	SI Jamshid No. P/27	CCP, Peshawar
221.	SI Muhammad Hassan No. P/28	CCP, Peshawar
222.	SI Shaukat Ali No. P/29	CCP, Peshawar
223.	SI Sultan Muhammad No. P/30	CCP, Peshawar
224.	SI Mukhtiar Ullah No. P/31	CCP, Peshawar
225.	SI Muhammad Ayaz No. P/32	CCP, Peshawar
226.	SI Alamgir No. P/33	CCP, Peshawar
227.	SI Qazi Aslam No. P/34	CCP, Peshawar
228.	SI Atlas Khan No. P/35	CCP, Peshawar
229.	SI Nazeef-ur-Rehman No. P/36	CCP, Peshawar
230.	SI Bakht Zali No. P/37	CCP, Peshawar
231.	SI Zafar Ali No. P/38	CCP, Peshawar
232.	SI Hamd Ali No. P/39	CCP, Peshawar
233.	SI Umer Sher No. P/40	CCP, Peshawar
234.	SI Abid Saeed No. P/41	CCP, Peshawar
235.	SI Muhammad Nawaz No. P/42	CCP, Peshawar
236.	SI Sher Azam No. P/44	CCP, Peshawar
237.	SI Imtiaz Khan No. P/45	CCP, Peshawar
238.	SI Wilayat Khan No. P/46	CCP, Peshawar
239.	SI Zubair Khan No. P/47	CCP, Peshawar
240.	SI Muhammad Ikram No. P/48	CCP, Peshawar
241.	SI Malik Ahmad No. P/49	CCP, Peshawar
242.	SI Gul Sher No. P/50	CCP, Peshawar
243.	SI Inayat Ullah No. P/52	CCP, Peshawar
244.	SI Zardad Ali No. P/53	CCP, Peshawar
245.	SI Misal Khan No. P/54	CCP, Peshawar
246.	SI Malik Taj No. P/55	CCP, Peshawar
247.	SI Behram Gul No. P/56	CCP, Peshawar
248.	SI Shakir Ullah No. P/57	CCP, Peshawar

Attested
A.K. Salik (Advocate)
DATTA CRAM

249.	SI Hassan Zamir No. P/58	CCP, Peshawar
250.	SI Mukaram Shah No. P/59	CCP, Peshawar
251.	SI Ali Akbar No. P/60	CCP, Peshawar
252.	SI Qaisro Khan No. P/61	CCP, Peshawar
253.	SI Inam Ullah No. P/62	CCP, Peshawar
254.	SI Muhammad Asim No. P/63	CCP, Peshawar
255.	SI Munir Khan No. P/64	CCP, Peshawar
256.	SI Ikhtiar Ali No. P/66	CCP, Peshawar
257.	SI Nasrullah No. P/67	CCP, Peshawar
258.	SI Khushal Khan No. P/68	CCP, Peshawar
259.	SI Noor Haider No. P/70	CCP, Peshawar
260.	SI Noor Gul No. 43/P	CCP, Peshawar
261.	SI Gohar Ali No. 41/MR	Mardan
262.	SI Khalid Khan No. P/72	CCP, Peshawar
263.	SI Abdul Jalil No. P/73	CCP, Peshawar
264.	SI Safdar Khan No. P/74	CCP, Peshawar
265.	SI Zakir Ullah No. P/75	CCP, Peshawar
266.	SI Muhammad Riaz No. P/77	CCP, Peshawar
267.	SI Muhammad Israr No. P/78	CCP, Peshawar
268.	SI Fazal Mabood No. P/79	CCP, Peshawar
269.	SI Khalid Khan No. P/80	CCP, Peshawar
270.	SI Muhammad Tayyeb No. P/81	CCP, Peshawar

Sd/-

(ARIF SHAHBAZ KHAN) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. and dated even

Copy forwarded to the:-

1. Addl: Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs:, Khyber Pakhtunkhwa, Peshawar.
3. PSO to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
4. Registrar, CPO Peshawar.
5. Supdt: Secret to provide synopsis to Career Planning Branch.
6. Supdts: Establishments-II &III, CPO Peshawar.

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POLICE DEPARTMENT BATTAGRAM

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA GAZETTE PART-II ORDER PASSED BY THE DISTRICT OFFICER, BATTAGRAM.

Dated Battagram the, 10

NOTIFICATION.

No 9152 /PC/ **Retirement:** Sub-Inspector Gulzar No 226/H this District is hereby retired on superannuation basis after 41 years qualifying service, with effect from 12.10.2017, with all pension benefits under the govt: rules.

District Police Officer
Battagram

Attested
A.U.Salih (Advocate)
BATTAGRAM

OFFICE OF THE REGIONAL POLICE OFFICER, HAZARA REGION ABBOT

No. 23732-33/E, Dated Abbottabad the, 13/10/2017.

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

1. Additional Inspector General of Police Investigation Pakhtunkhwa, Peshawar alongwith two spare copies of Notification for publication in Khyber Pakhtunkhwa Part-II.
2. District Police Officer, Battagram.

Regional Police Officer
Hazara Region (Abbottabad)
AEC Dilawar

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فائل نمبر 32 نمبر شمار 07

ANNEXURE B

مدرسہ چھوڑنے کا سرٹیفکیٹ

نام گل زار ولدیت سکندر خان

تاریخ پیدائش (12.10.1958) بارہ اکتوبر انیس سو اٹھاون داخلہ نمبر 34

تصدیق کی جاتی ہے کہ مندرجہ بالا طالب علم جو اس مدرسہ میں 18.06.1968 تک پڑھتا رہا ہے مدرسہ ہذا کی کل رقمیں جو اس کے ذمہ واجب الادا تھیں ادا کر دی ہیں اور اسے تاریخ مندرجہ بالا پر اپنا نام خارج کرنے کی اجازت دے دی گئی ہے۔

یہ جماعت 4th حصہ ہر الگ میں پڑھتا تھا۔ جس میں یہ پاس / فیل ہوا اس کا امتحان 4th حصہ کے مطابق ترقی دینے کے لئے لیا گیا جو اسے دی گئی / جس کا وعدہ کیا گیا۔ 18 تک چہارم سے پاس ہوا۔

مدرسہ ہذا میں داخل ہونے کی تاریخ	خارج ہونے کی تاریخ	مدت حاضری		ممکن حاضریاں	فی الواقع حاضریاں	رخصت جو دوران سال حاصل کی گئی
		از	تا			
27/06/1966	18/06/1968			/	/	

تاریخ اجرا 28.08.2015 انچارج داخل خارج 4 رئیس مدرسہ

P.S.H.T
G.P.S. Chhatri
Abbottabad

صرف سکالرشپ پانے والوں کی صورت میں

قسم سکالرشپ _____ سکالرشپ کی مقدار _____ کس سال عطا ہوا _____

کس تاریخ تک ادا کیا گیا _____ کون دیتا ہے _____ رخصت جو ہر ایک مدرسہ میں لے چکا ہے _____

1 _____ 2 _____ 3 _____ 4 _____

تصدیق کیا جاتا ہے _____ ولد _____ طالب علم _____ جماعت _____ جو _____ سکول _____ ضلع _____ سے مدرسہ چھوڑنے کا سرٹیفکیٹ نمبر _____ مورخہ _____ لے کر چلا گیا _____ سکول _____ ضلع _____ کی _____ جماعت میں داخل ہو گیا ہے

اسکی تاریخ پیدائش _____ رئیس مدرسہ _____

Muhammad Haneef
Senior Phy: Edu: Teacher
Secondary Education
Abbottabad

Attested
A.K.Salih (Advocate)
BATTAGRAM

DUPLICATE سنہ 19 منظور شدہ / غیر منظور شدہ

گورنمنٹ ہائی سکول کھوال

ضلع ایبٹ آباد

21

ANNEXURE C

مدرسہ چھوڑنے کا سرٹیفکیٹ

نمبر 99

نام طالب علم گلزار نمبر فائل XII

تاریخ پیدائش بارہ اکتوبر انیس سو اٹھاون (12-10-58) مد فیس

نمبر رجسٹر داخلہ 1430/1019 کاشتکار یا غیر کاشتکار کاشتکار

تصدیق کیا جاتا ہے کہ گلزار ولد سکندر خان قوم مغل نے جو اس مدرسہ میں

تاریخ 31/3/1973 تک پڑھتا رہا مدرسہ کی کل رقمیں جو اس کے ذمہ واجب الادا تھیں ادا کر دی ہیں اور اسے تاریخ مندرجہ بالا پر

اپنا نام خارج کرانے کی اجازت دی گئی یہ جماعت ہشتم حصہ ہشتم میں پڑھتا تھا اور

ان طلباء کی صورت میں جو مدرسہ کے کسی حصہ کی مقررہ پڑھائی کے اختتام پر چھوڑیں — اس کا امتحان ہشتم میں ہشتم درجہ کے مطابق لیا گیا تھا جس میں یہ پاس ہوا / فیل ہوا

مضامین جس میں طالب علم فیل ہوا بعد از ہشتم کورس فارغ شد

ان طلباء کی صورت میں جو مدرسہ کے کسی حصہ کی مقررہ پڑھائی کے اختتام پر نہ چھوڑیں — اس کا امتحان ترقی دینے کے لئے ہشتم میں لیا گیا تھا۔ جو اسے دی گئی / جس کا وعدہ کیا گیا

تصدیق کیا جاتا ہے کہ مندرجہ ذیل اندراج اس مدرسہ کے رجسٹروں اور ان سارٹیفکیٹوں کے مطابق صحیح ہیں جو اس نے ان مدرسوں سے حاصل کئے ہیں۔ جہاں اس تعلیمی سال میں اس سے پہلے تعلیم پائی ہے۔ چال چلن "اچھا رہا"

نمبر	مدرسہ	داخل ہونے کی تاریخ: سکول میں	درجہ میں	جماعت میں	خارج ہونے کی تاریخ	سال مدرسہ میں حاضری کی مدت: از	تا	حاضریاں جتنی سال میں ہونی ممکن تھیں	حاضریاں جتنی سال مدرسہ میں فی الواقع ہوئیں	رخصت جو سال مدرسہ میں لی گئی
۱	گورنمنٹ مدرسہ									
۲	ہائی									
۳	سکول	7/6/72	7/6/72	7/6/72	31/3/73	7/6/72	31/3/73			
۴	کھوال									
			میزان							

ہیڈ ماسٹر

تاریخ اجراء 22-3-2017

22/3/17

صرف سکالرشپ پانے والوں کی صورت میں

قسم سکالرشپ ——— سکالرشپ کی مقدار ———

کس سال عطا ہوا ——— کس تاریخ تک ادا کیا گیا ———

کون دیتا ہے ——— رخصت جو ہر ایک مدرسہ میں لے چکا ہے ———

۱ ——— ۲ ——— ۳ ——— ۴ ———

نوٹ: عام طور پر مدرسہ چھوڑنے کے سرٹیفکیٹ کے لئے درخواست مدرسہ سے علیحدہ ہونے کے ایک ماہ کے اندر ہونی چاہئے بصورت ان طلباء کے جنہوں نے مڈل سکول کا امتحان دیا ہو ایک ماہ نتیجہ نکلنے کی تاریخ سے گننا چاہئے۔
بعد گزرنے ایک ماہ کے مدرسہ چھوڑنے کے سرٹیفکیٹ کے لئے موازی آٹھ آنے فیس چارج ہوگی۔
اگر مدرسہ چھوڑنے کا سرٹیفکیٹ گم ہو جائے اور نئے سرٹیفکیٹ کے لئے درخواست دی جائے تو نئے سرٹیفکیٹ کیلئے موازی آٹھ آنے وصول کئے جائیں۔

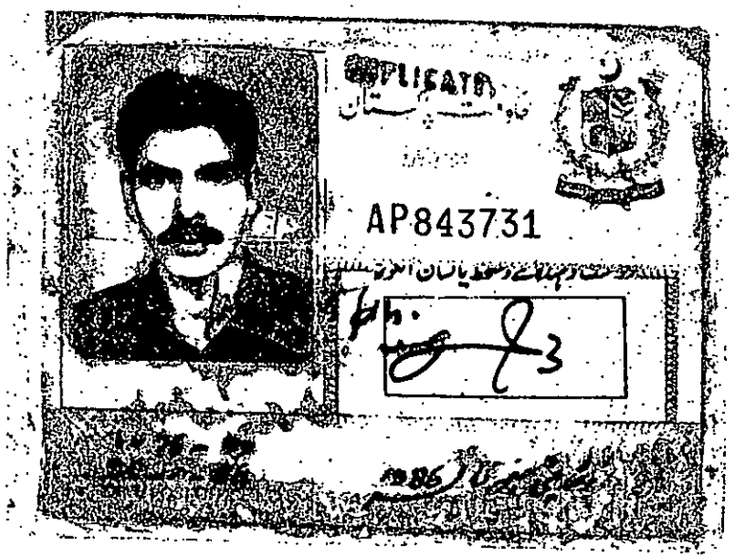
تصدیق کیا جاتا ہے ——— ولد ——— طالب علم ——— جماعت ——— جو ———
سکول ——— ضلع ——— سے مدرسہ چھوڑنے کا سرٹیفکیٹ نمبر ———
مورخہ ——— سنہ 19 ——— کو چلا گیا ——— سکول ——— ضلع ——— کی ——— جماعت میں داخل ہو گیا ہے
اس کی تاریخ پیدائش ——— ہیڈ ماسٹر ———

Attested
M.K. Salih (Advocate)
ABBOTTABAD

Muhammad Hameed
Senior Phy: Education Officer
Secondary Education
Abbottabad

22

ANNEXURE
D



Attested
A.L.Salik (Advocate)
BATTAGRAM

شناختی نمبر 421-86-518459

نام گلزار

والد کا نام سمند خان

موجودہ پتہ گاؤں، ڈاکخانہ چھتری تحصیل و ضلع ایبٹ آباد

مستقل پتہ ایضاً

شناختی علامت بائیں آنکھ پر نشان زخم

تاریخ پیدائش 15/12/1958

۱۔ کارڈ گم ہونے کی صورت میں قریبی تھانے یا رجسٹریشن دفتر میں اطلاع دیں۔
۲۔ شناختی کارڈ ملنے پر قریبی پوسٹ بکس میں ڈال دیں۔

Mahmut

REGISTRAR

Attested
A.H. Solih (Advocate)
ABBOTTABAD

T5F0FB خاندان نمبر 13101-6916914-7 شناختی نمبر

موجودہ پتہ چھتری بالا، ڈاکخانہ چھتری، تحصیل و ضلع ایبٹ آباد

مستقل پتہ چھتری بالا، ڈاکخانہ چھتری، تحصیل و ضلع ایبٹ آباد

27/10/2021 تاریخ تنسیخ 27/10/2011 تاریخ اجراء

شناختی کارڈ ملنے پر قریبی پوسٹ بکس میں ڈال دیں

12180-0840008-1

24

OFFICE OF THE DISTRICT POLICE OFFICER BATTAGRAM
Ph. # 0997-310036 / 0997-310071
Fax # 0997-311616
E-Mail: batpolice@yahoo.com

No: 10374 /, Dated 17 / 11/2017

To, **The:** Regional Police Officer,
Hazara Region Abbottabad.

ANNEXURE
E

Subject: **APPLICATION**

MEMORANDUM:

Enclosed kindly herewith an application in respect of Ex-SI Gulzar Khan No. 144/H of this district Police for your kind perusal and further necessary action, please.

District Police Officer,
Battagram.

Attested
Advocate
BATTAGRAM

بحضور جناب قابل احترام ریونیو بورڈ آفس صوبہ KPK پشاور

عنوان: فراہمی / عطائیگی نقل حتمی حکم در درخواست مورخہ 4/10/2017 در سلسلہ ترقیاتی بعنوان انکرٹ پوسٹ آفس ان بالا

جناب عالی

معروض ہوں کہ میں سائل نے قبل ازیں مورخہ 4/10/17 ایک تحریری درخواست در سلسلہ ترقیاتی بعنوان انکرٹ پوسٹ آفس ان بالا بحضور جناب ریونیو بورڈ کی شنوائی میں ہو چکی ہے اپنے نوازش متعلقہ درخواست پر اگر حتمی حکم جاری بھی صادر ہو چکا ہو تو اس کی Attested کاپی عنایت فرما کر مشکور فرماویں۔ سائل دعا گو رہے گا

العارض

سائل گلزار خان Ex/SI و سٹرکٹ بٹگرام

16/11/2017

Attested
Adv. Salih (Advocate)
BATTAGRAM

Phone No. 0992-9310021
Fax No. 0992-9310023

From: The Regional Police Officer,
Hazara Region Abbottabad

To: The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

No. 27459 /E, Dated Abbottabad the, 04/12 /2017.

Subject:- **APPLICATION.**

Memorandum:

In continuation of this Office Memo: No.24131/E dated 18-10-2017.

Enclosed kindly find herewith an application in respect of Ex-SI Gulzar Khan No.H/144 of Battagram District for further action please.

Regional Police Officer
Hazara Region Abbottabad

No. 27460 /E,

Copy of above is forwarded to District Police Officer, Battagram for information w/r to his office Memo: No.10374 dated 17-11-2017.

Attested

Regional Police Officer
Hazara Region Abbottabad
(AEC Dilawar)

27

ANNEXURE F

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

No. 880 /CPB, dated Peshawar the 27 /12/2017

To: The Regional Police Officer,
Hazara Region, Abbottabad.

Subject: **APPLICATION**

Memo:

Please refer to your office Memo: No. 27459/E, dated 04.12.2017 on the subject noted above.

Ex-Sub-Inspector Gulzar Khan No. H/144 submitted an application for promotion to the rank of Inspector. According to date of birth, Gulzar Khan No. H/144 has been retired on 12.10.2017 after attaining the age of superannuation. As per rules, there is no provision for promotion.

The applicant may be informed accordingly.

(ZIA ALI SHAH)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Attested
A.K.Salih (Advocate)
EATTAGRAM

بخدمت جناب RPO صاحب ہزارہ ریجن ایبٹ آباد

عنوان:- محکمانہ اپیل

جناب عالی:- سائل ذیل عرض گزار ہے۔

1:- یہ کہ ریکارڈ کے مطابق سائل کی تاریخ پیدائش 10/12 ہے۔ جو 60 سال ملازمت پوری کرنے پر سائل کی پنشن کی تاریخ 10/12/2017 بنتی ہے۔ جو کہ غلط ہے۔ 1957

2:- یہ کہ بروئے چٹھی نمبری 821/CPB پشاور مورخہ 05/10/2017 سائل کا نام گریڈ نمبر 14 کے عہدہ SUB-INSPECTOR (BS-14) ALREDY ON LIST OF INFORMATION REGARDING کے زیر نظر تھا۔ اور سائل پر اُمید تھا کہ سائل جونکہ پنشن کے قریب ہے۔ تو سائل کو انسپکٹر کے عہدہ پر ترقی دی جاکر گریڈ PB-16 میں پنشن یافتہ تصور کیا جائے گا۔ جو سائل نے اسی سلسلے میں درخواست گذرانی تھی۔ لیکن سائل کی درخواست پر کوئی فیصلہ نہیں فرمایا گیا تھا۔ کہ سائل کو 12/10/2017 تصور کیا جاکر چٹھی نمبری 9152/PC مورخہ 12/10/2017 (Retired) ایبٹ آباد ہزارہ جاری کی گئی جو سائل کو 23732-33/E مورخہ 13/10/2017 کو مل گئی ہے۔ امروز مورخہ 16/11/2017 کو سائل کے سکول چھوڑنے کے سرٹیفکیٹ کے مطابق سائل کی تاریخ پیدائش 12/X/1958 ہے۔ اور یوں سائل کی (Retirement) مورخہ 12/10/2017 کو قبل از وقت اور خلاف قانون ہے۔

3:- یہ کہ سائل کے (Retirment) کے حکم پر نظر ثانی اس لئے کہ سائل کو 05/10/2017 کی روشنی میں انسپکٹر کے عہدہ کیلئے فرزول تصور کرتے ہوئے مورخہ 12/10/2018 تک ملازمت جاری رکھنے کا حکم بخشا جاوے۔ جناب کی نوازش ہوگی۔

العارض

سائل کلیم اللہ EX ASI H-146 ضلع ٹورگھر

موجودہ پتہ:- گاؤں چھڑی بالا ڈاکخانہ خالد بانڈی تحصیل ٹھکری تھانہ زوان شیر ضلع ایبٹ آباد

مورخہ 16/11/2017

Attested
A.K.Salik (Advocate)
BATTAGRAM

). 565 For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

ived a registered* _____ Date-Stamp.
essed to _____

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

als of Receiving Officer

Insured for Rs. (in figures) _____ (in words) _____

Weight Kilo / Grams

Insurance fee Rs. ____ Ps. ___ (in words)

Name and address of sender

---

o. 566 For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

ived a registered* _____ Date-Stamp
ssed to _____

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

ls of Receiving Officer

Insured for Rs. (in figures) _____ (in words) _____

Weight Kilo / Grams

Insurance fee Rs. ____ Ps. ___ (in words)

Name and address

). 565 For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

ived a registered* _____ Date-Stamp.
essed to _____

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

als of Receiving Officer

Insured for Rs. (in figures) _____ (in words) _____

Weight Kilo / Grams

Insurance fee Rs. ____ Ps. ___ (in words)

Name and address of sender

---

o. 566 For Insurance Notices see reverse. Rs. Ps.
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

ived a registered* _____ Date-Stamp
ssed to _____

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

ls of Receiving Officer

Insured for Rs. (in figures) _____ (in words) _____

Weight Kilo / Grams

Insurance fee Rs. ____ Ps. ___ (in words)

Name and address

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REVISED SENIORITY LIST OF INSPECTORS & SUB INSPECTORS ON LIST "F" OF KHYBER PAKHTUNKHWA, POLICE AS IT STOOD ON 23.05.2017.

No.1326/E-II, Seniority List:- The seniority list of Inspectors and Sub Inspectors on List "F" of Khyber Pakhtunkhwa Police as it stood on 23.05.2017 is hereby published for information to all concerned:-

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMMN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	REMARKS
1.	Sher Ali No.M/110	Dir Lower	BA	01.04.1960	06.10.1977	21.06.2008	25.05.2015	25.05.2015	He is yet to be confirmed after completion of probation period of 2 years.	His name was placed top of the seniority list on the direction of Service Tribunal vide order No.1584-1613/E-II, Dt 21.07.2016.
2.	Muhammad Sajjad No. K/30	Karak	MA	12.08.1965	02.05.1991	16.03.2005	07.11.2007	11.01.2008	23.12.2011	Assigned seniority vide No. 4526-70.E-II dated 04.03.2008
3.	SI Sanaullah No. D/10	D.I.Khan	10th	12.04.1959	17.06.1977	01.09.2007	05.04.2008	05.04.2008	-	Reverted as SI by RPO.Bannu vide No. 3067-69.EC dt: 16.11.2010
4.	Jehanzeb No.H/43	Manshera	10th	03.03.1960	26.05.1984	27.03.2008	05.04.2008	05.04.2008	31.10.2013	Name replaced in the seniority list according to his date of confirmation in the rank of SI and admission to list "F" vide endst No.2371-86/E-II, DT 09.11.2016.
5.	SI Sabir Khan No.P/69	Pesahwar	BA	08.12.1958	21.12.1994	30.06.2008	05.04.2008	05.04.2008	-	Reinstated in service by applet board & reverted to the rank of SI vide PPO No.S780-89 dated 29.01.2016.
6.	S. Jamal Athar Shah No. P/76	Peshawar	M.Sc	20.03.1975	25.06.1998	30.06.2008	05.04.2008	05.04.2008	31.10.2013	
7.	Sher Afsar No.MR/66	Swabi	10th	09.02.1963	30.10.1984	13.07.2009	20.12.2011	25.05.2016	-	Assigned fixation of seniority with his colleagues officers vide order Endst: No.482-85/E-II, DT 16.02.2017.
8.	SI Mazhar Jehan No. K/19	Kohat	FA	12.12.1970	26.02.2000	30.06.2008	30.07.2010	30.07.2010	-	Reverted to the rank of SI vide DIG Kohat Region Order Endst:No.2146-47/EC,dt:26.2.014
9.	Nasir Khan No. P/110	Peshawar	BA	20.12.1972	02.05.1991	24.11.2008	30.07.2010	30.07.2010	29.8.2014	
10.	Jamil-Ur-Rehman No.H/28	Abbottabad	BA	16.04.1974	07.01.2002	07.01.2002	25.02.2008	25.02.2008	29.08.2014	
11.	Rehmat Ali No. P/150	Peshawar	10th	01.03.1960	17.06.1979	04.11.2011	10.11.2011	10.11.2011	02.08.2012	

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMMN: TO LIST "F"	D.O PROMOTION AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	REMARKS
670.	SI Aziz Ullah No. P/373	Peshawar	10th	01.10.1964	11.01.1983	01.03.2016	19.07.2016	-	-	
671.	SI Musa Khan No. P/374	Peshawar	FA	07.11.1969	31.12.1987	01.03.2016	19.07.2016	-	-	
672.	SI Islah-ud-Din No. P/375	Peshawar	10th	30.04.1964	14.04.1983	01.03.2016	19.07.2016	-	-	
673.	SI Behroz Khan No. P/402	Nowshera	BA	08.01.1964	22.08.1985	01.03.2016	19.07.2016	-	-	
674.	SI Amir Muhammad No. P/403	Peshawar	FA	10.02.1968	13.08.1988	01.03.2016	19.07.2016	-	-	
675.	SI Imdad Ullah No. P/376	Mardan	FA	04.02.1970	01.09.1992	01.03.2016	19.07.2016	-	-	
676.	SI Irshad Ali No. P/377	Mardan	FA	14.05.1972	29.01.1991	01.03.2016	19.07.2016	-	-	
677.	SI Ismail Shah No. P/378	Nowshera	10th	01.03.1969	17.08.1988	24.02.2016	19.07.2016	-	-	
678.	SI Muhammad Naeem No. P/379	Peshawar	10th	01.12.1966	02.09.1987	01.03.2016	19.07.2016	-	-	
679.	SI Muhammad Javed No. P/380	Peshawar	10th	16.04.1964	22.03.1986	01.03.2016	19.07.2016	-	-	
680.	SI Javed Iqbal No. P/381	Peshawar	10th	01.01.1965	22.03.1986	01.03.2016	19.07.2016	-	-	
681.	SI Farhad Hussain No. P/ 382	Peshawar	FSC	15.04.1968	06.07.1989	01.03.2016	19.07.2016	-	-	
682.	SI Zafar Ali No. P/383	Mardan	10th	05.02.1966	18.09.1986	01.03.2016	19.07.2016	-	-	
683.	SI Ali Jan No. P/404	Peshawar	10th	15.03.1968	22.06.1987	01.03.2016	19.07.2016	-	-	
684.	SI Murad Ali No. P/405	Peshawar	FA	17.05.1970	05.12.1988	01.03.2016	19.07.2016	-	-	
685.	SI Zahir Shah No. P/384	Peshawar	FA	04.12.1964	05.08.1985	01.03.2016	19.07.2016	-	-	
686.	SI Qeemat Gul No. P/385	Peshawar	10th	17.02.1968	28.07.1987	01.03.2016	19.07.2016	-	-	
687.	SI Gul Shed No. P/386	Charsadda	10th	01.11.1972	02.07.1991	01.03.2016	19.07.2016	-	-	
688.	SI Syed Rokhan Shah No. P/387	Peshawar	10th	02.04.1969	30.06.1988	01.03.2016	19.07.2016	-	-	
689.	SI Khushal Khan No. P/388	Peshawar	10th	02.05.1965	27.06.1989	01.03.2016	19.07.2016	-	-	
690.	SI Himayat Ullah No. P/389	Peshawar	10th	12.02.1967	25.09.1986	01.03.2016	19.07.2016	-	-	
691.	SI Bakht Diyan No. P/390	Peshawar	10th	08.02.1967	29.03.1988	01.03.2016	19.07.2016	-	-	
692.	SI Hafeez-ur-Rehman No. P/391	Nowshera	MA	10.10.1978	12.02.2009	01.03.2016	19.07.2016	-	-	
693.	SI Akhtar Naseer No. P/392	Nowshera	MA	10.02.1978	12.02.2009	01.03.2016	19.07.2016	-	-	
694.	SI Mir Afzal No.H/141	Abbottabad	10th	17.08.1957	17.05.1977	07.03.2016	19.07.2016			
695.	SI Ghazi Khan No. H/143	Abbottabad	7th	20.12.1958	14.09.1978	07.03.2016	19.07.2016	-	-	
696.	SI Gulzar No. H/144	Abbottabad	9th	12.10.1957	12.10.1976	07.03.2016	19.07.2016	-	-	
697.	SI Gul Muhammad No. H/145	Hazara	8th	05.07.1957	14.01.1976	07.03.2016	19.07.2016	-	-	
698.	SI Imtaiz Ahmad No.146/H	Abbottabad	10th	01.03.1958	19.10.1976	07.03.2016	19.07.2016	-	-	
699.	SI Muhammad Sadiq Shah	Hazara	FA	10.01.1968	01.10.1990	07.03.2016	19.07.2016	-	-	

وکالت نامہ

کورٹ فیس قیمتی

بعدالت SERVICES TRIBUNAL KHYBAR PUKHTUN KHAWA

GULZAR بنام GOVT. K.P.K.

منجانب: APPELLANT دعوے یا جرم SERVICE APPEAL

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی وجوابدہی برائے پیشی بمقام: ARBOTT ABAD

مامون الرشید **امان اللہ سالک ایڈووکیٹ ہائی کورٹ (بٹگرام)** صالحین خان

(جمال عبدالناصر، امیر محمد خان، نیاز محمد خان، عنایت اللہ خان) ممبر ڈسٹرکٹ بار ایسوسی ایشن **"BATTAGRAM"**

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت 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 ہوا 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 ہونگے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا محتانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردا ذات منظور و مقبول ہوگا۔ اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ درخواست اجرائے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اس پر ثالثی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت جانے بیرونجات از کچہری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرقی یا گرفتاری قبل از گرفتاری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ محتانہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اس کے کسی جز کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے قانون کو بھی ہر امر میں وہی اور ویسے ہی اختیار حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہرجانہ 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 پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

ATTESTED & ACCEPTED

لہذا وکالت نامہ لکھ دیا ہے کہ سند رہے مورخہ 19 ماہ جنوری 2018

Amanullah Salik
Advocate High Court
Distt. Courts BATTAGRAM

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد العبد

گلزار اپیلانٹ

BEFORE THE HONOURABLE KHYBER PUKHTUN KHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 259/2018.

Gulzar s/o Sumandar Khan SI (Police) resident of Chitri, Tehsil & District Abbottabad ..... Appellant

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Peshawar & others.
.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth;

Preliminary Objections: -

i. That the appeal is not based on facts and appellant has got no cause of action or locus standi.
ii. That the appeal is not maintainable in the present form.
iii. That the appeal is bad for non-joinder of necessary and mis-joinder of unnecessary parties.
iv. That the appellant is estopped by his own conduct to file the appeal.
v. That the Appeal is barred by the law and limitation.
vi. That appellant has not come to the Honorable Tribunal with clean hands.

FACTS:-

1. Pertains to record.
2. Pertains to record.
3. The appellant could not be promoted due to retirement from service on superannuation.
4. The appellant's service record and all the documents in his record reveal that his date of birth is 12.10.1957.
5. The appellant's correct date of birth is 12.10.1957 which has been mentioned in service record.

6. Incorrect the change in date of birth is allowed within two years of entry into service otherwise at this belated stage it is against law & rules and once date of birth is recorded in the service record and not questioned within stipulated period of two years, is now considered as correct and final.
7. The appellant has no right to file any appeal / representation at this belated stage.

GROUNDS.

a. Incorrect. The competent authority has not committed any illegality and rightly retired on superannuation.
b. Incorrect. All the officials at the time of appointment know their service record. The appellant is wrongly distorting the facts for his personal gain.
c. Incorrect. The appellant was in knowledge of his date of birth which was correctly written in the service record.
d. Incorrect. The appellant has made the concocted story for personal benefit.
e. Incorrect. As replied in above paras.
f. Incorrect. The appellant has no right under any law / rule to get benefit at this belated stage.
g. Incorrect. As replied in above paras.

PRAYER: -

In view of the above mentioned facts, the appeal in hand may kindly be dismissed being devoid of any legal force.

District Police Officer
Battagram
(Respondent No.06)

Regional Police Officer
Hazara Region Abbottabad.
(Respondent No.05)

Inspector General of Police
KPK Peshawar
(Respondent No. 4)

Accountant General KPK
Peshawar
(Respondent No. 3)

Govt. of KPK Secretary
Finance Peshawar
(Respondent No. 2)

Govt. of KPK Secretary
Home & Tribal Affairs
Peshawar
(Respondent No. 1)

(4)

BEFORE THE HONORABLE KP SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 259/2018.

Gulzar..... (Appellant)

VERSUS

Govt: of KPK & others..... (Respondents)

PARAWISE COMMENT ON BEHALF OF RESPONDENTS

Para wise Comments along with Affidavit prepared by Legal Branch of District Police Officer, Battagram is submitted for favor of signature as Respondent No. 4 (Worthy Inspector General of Police Khyber Pakhtunkhwa, Peshawar). The draft vetted by Addl: Advocate General, Khyber Pakhtunkhwa, Peshawar High Court, Abbottabad Bench, Abbottabad is placed at F/ A, please.

SP Court & Litigation
10.08.2020.

AIG/ Legal Please:-

IGP/ KPK Please.

(5)

BEFORE THE HONOURABLE KHYBER PUKHTUN KHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 259/2018.

Mr. Gulzar s/o Sumandar Khan SI (Police) resident of Chitri, Tehsil and District Abbottabad.

Appellant

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Peshawar & others.

.....Respondents

Respondents

AFFIDAVIT

I do hereby affirm and declare on oath that the contents of written Para-wise comments are true and correct to the best of my knowledge and belief that nothing has been concealed from the Honorable Service Tribunal.

Submitted please.

District Police Officer
Battagram
(Respondent No.01)

بخدمت جناب سیشن جج صاحب ایبٹ آباد

جناب عالی!

گزارش ہے کہ سائل کا آج الحیاب کی عدالت میں مقدمہ اپیل نمبر 259/18 میں تاریخ پیشی مقرر ہے۔

میرے وکیل صاحب امان اللہ خان صاحب

بسلسلہ مصروفیات ضلع بٹگرام میں بروز جمعہ شریف۔ ہفتہ 20/7 کے 21/2018 کو ہوتے ہیں)

جبکہ سائل کا بذریعہ موبائل فون نمبر 0300 9694757 رابطہ کیا گیا ہے۔ جو کہ بیٹی سے غائب ہونا بتا رہے ہیں۔

جناب والا شان کی خدمت میں عرض ہے کہ سائل کی آئندہ تاریخ پیشی بسلسلہ بروز جمعہ شریف یا ہفتہ کے علاوہ دینے کا حکم صادر فرمایا جائے۔

العارض

سائل

سابق گارڈ EX ضلع بٹگرام

حال وکیل ضلع و تحصیل ایبٹ آباد

Allowed
20.7.2018

20/7/18