

30.11.2022

Learned counsel for the appellant present. Mr. Waqar Ahmad, ASI alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

As learned Member (Executive) Mr. Mian Muhammad was not feeling well and has proceeded on short leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 25.01.2023 before the D.B.

SCANNED
KPST
Peshawar

75-1-23

Proper DB is not available

(Salah-ud-Din)
Member (J)

The case is adjourned to 8-5-23

Reader

12th May, 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, DDA for the respondents present.

Learned counsel for the appellant requested for adjournment in order to assist the Tribunal. Last opportunity is granted. To come up for arguments before the D.B on 18.07.2022.


(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

18.07.2022

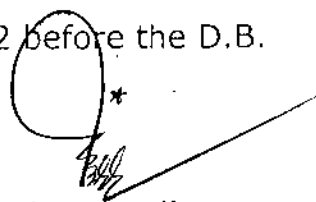
Due to non-availability of Bench, case is adjourned to 15.09.2022 for the same as before.



Reader

15.09.2022

Appellant in person present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 30.11.2022 before the D.B.


(Mian Muhammad)
Member (Executive)


(Salah-Ud-Din)
Member (Judicial)

24.11.2021

Learned counsel for the appellant present.

Appellant Deposited
Security & Process Fee

[Handwritten signature]

Security and process fee not deposited. Learned counsel for the appellant submitted an application for granting permission to the appellant to deposit security and process fee. Learned counsel for the appellant is directed to deposit the same today, thereafter notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 19.01.2022 before S.B.

[Handwritten signature]
(MIAN MUHAMMAD)
MEMBER (E)

19.01.2022

Nemo for the appellant. Mr. Muhammad Adeel Butt, Addl. AG for respondents present.


Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General sought time for submission of reply/comments. Last opportunity is granted to respondents to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B 12.05.2022.

[Handwritten signature]
(Atiq-Ur-Rehman Wazir)
Member (E)

29.03.2021

Junior to counsel for the appellant present. Mr. Kabirullah Khattak learned Addl. AG for respondents present.

Reply/comments on behalf of respondents not submitted. Learned Additional Advocate General is required to contact the respondents and facilitate the submission of reply/comments. To come up for reply/comments on 05.07.2021 before S.B.



(Atiq Ur Rehman Wazir)
Member (E)

05.07.2021

None for the appellant present. Mr. Adeel Butt, Additional Advocate General respondents present.

Security and process has not been deposited. Notice be issued to the appellant and his counsel with the direction to deposit security and process fee within three days, after the issuance of notice. Thereafter, notice be issued to the respondents with the direction to submit written reply/comments within 10 days in office, positively. In case the respondents have not submitted reply/comments within stipulated time, office shall put up the appeal with a report of non-compliance. To come up for arguments on 24.11.2021 before D.B.



Chairman

04.01.2021

~~Proceedings with counsel present.~~
Counsel for the appellant present.

~~Proceedings with counsel present.~~
Contends that during the departmental proceedings the procedure required under the rules was not adopted. Furthermore, the medical record respondents have submitted of ~~the~~ ~~appellant~~ ~~was~~ ~~not~~ ~~extended~~ ~~any~~ ~~consideration~~ ~~has~~ ~~been~~ ~~made~~ ~~that~~ ~~since~~ ~~the~~ ~~petitioner~~ ~~was~~ ~~dismissed~~ ~~from~~ ~~service~~ ~~at~~ ~~the~~ ~~time~~ ~~of~~ ~~Departmental~~ ~~Promotion~~ ~~Committee~~ ~~hence~~ ~~his~~ ~~name~~ ~~was~~ ~~not~~ ~~reflected~~ ~~in~~ ~~the~~ ~~seniority~~ ~~list~~ ~~Now~~ ~~the~~ ~~petitioner~~ ~~was~~ ~~given~~ ~~revised~~ ~~promotion~~ ~~to~~ ~~the~~ ~~rank~~ ~~of~~ ~~officer~~ ~~and~~ ~~was~~ ~~available~~ ~~for~~ ~~16.01.2014~~ ~~but~~ ~~the~~ ~~appellant~~ ~~list~~ ~~does~~ ~~not~~ ~~contain~~ ~~name~~ ~~of~~ ~~the~~ ~~petitioner~~ ~~to~~ ~~all~~ ~~just~~ ~~exceptions~~. Appellant is required to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 29.03.2021 before S.B.

Security has not been deposited

~~Seniority list is also attached with file. All respondents referred to promotion to the rank of officer are required to be confirmed as was done with all other candidates.~~

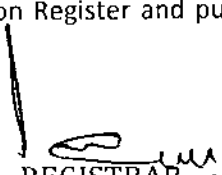

~~In view of the above, respondents are directed to pass an appropriate order in respect of seniority of the petitioner and submit report on or before 03.05.2021 to S.B.~~

~~Signature~~

FORM OF ORDER SHEET

Court of _____

Case No.- 14225 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/11/2020	<p>The appeal of Mr. Saqib Shaheen resubmitted today by Mr. Athar Abbas Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2- This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>04/01/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Saqib Shaheen r/o Latember district karak received today i.e. on 27.10.2020 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellatant.
- 2- Address of respondent no.4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service tribunal Rules 1974.

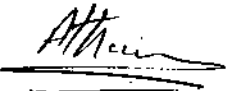
No. 3092 /S.T.

Dt. 28/10 /2020.


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Akhtar Abbas Adv. Pesh.

*Needful done accordingly and case
is re-submitted for fixing date
for hearing.*


13/11/2020

BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

In Ref.
S.A _____/2020

14225/20

SAQIB SHAHEEN

APPELLANT

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA, THROUGH CHIEF
SECRETARY AND OTHERS

RESPONDENTS


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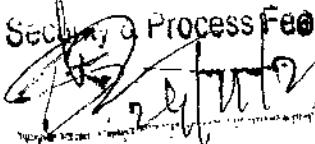
APPELLANT

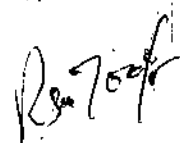
Dated: 27-10-20

Through


Athar Abbas
Advocates High Court,
Peshawar

Secretary & Process Fee





BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

In Ref.
S.A. _____/2020

14225/20

SAQIB SHAHEEN S/O SHAHEEN ISLAM (SHAHEED) R/O
LATAMBER DISTRICT, KARAK.

APPELLANT

VERSUS

1. GOVT: OF KHYBER PAKHTUNKHWA THROUGH CHIEF SECRETARY, CIVIL SECRETARIAT PESHAWAR.
2. INSPECTOR GENERAL OF POLICE, GOVT: OF KHYBER PAKHTUNKHWA, PESHAWAR.
3. DEPUTY INSPECTOR GENERAL OF POLICE, KOHAT DIVISION.
4. ASSISTANT INSPECTOR GENERAL OF POLICE, TRAINING DIRECTORATE, KHYBER PAKHTUNKHWA.
5. DISTRICT POLICE OFFICER, DISTRICT KARAK.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 ON ACCEPTANCE OF THIS APPEAL AN IMPUGNED TERMINATION ORDER DATED: 14/11/2019 & 27/02/2020 ISSUED BY THE RESPONDENTS MAY BE SET ASIDE AND THE RESPONDENTS ARE DIRECTED TO RE-^{MAY KINDLY BE} INSTATE THE APPELLANT AGAINST THE SAME POST OF CONSTABLE INTO HIS SERVICES WITH ALL BACK BENEFITS.

Respectfully Sheweth:

1. That the father of the appellant was an employee of Police Department and served in the department since long with honestly and was martyred on 18/11/2014 in the bomb blast while performing his duty.
(Copy of F.I.R & death compensation Certificate is attached as Annex-A & B)

2. That after the death of the appellant's father, the appellant was appointed in the police department against the vacant post of Constable (BPS-5) in the Shaheed Quota on 18/04/2016.

(Copy of appointment order is attached as annex-C)

3. That the appellant very hard fully and honestly performed his duty and was attended the mandatory training as an when the department required but suddenly and unfortunately when he was in training Course, he was informed by the police station^{Letambar} Karak about the sudden killing incident of his sister due to some family issues and he left the training and lodged an F.I.R against the culprit on 27/05/2019 in District Karak.

(Copy of F.I.R is attached as Annex-D)

4. That after such occurrence and misshape, the appellant suffered physically as well as mentally being quite young and being the only son, he is also the only hope for his family. Sudden, facing such situation as well as enmity, the appellant became mentally distorted on one side and on the other hand, the enemy of the appellant give life threats and dire consequences to the life and property of the appellant. Due to these anxiety and tuff position, the appellant started his medical treatment and was diagnosis the disease of Epilepsy.

(Copy of Medical Report is attached as Annex-E)

5. That due to above cited facts, the appellant remained absent from the duty/training from 04/07/2019 to 02/08/2019 and the District police officer Karak issued Final Show cause Notice against the appellant bearing No.313/PA(Eng) dated: 17/09/2019.

(Copy of Notice is attached as Annex-F)

6. (That the appellant properly replied of the above cited show cause notice which was turned down by the respondent and initiated departmental inquiry against the appellant and issued charge sheet and imposed major penalty upon the appellant by issuing impugned order of removal/discharge from service on 14/11/2019) as well as the absence period of 97 days has been treated as leave without pay, which is against the law and fact.

(Copy of termination order is attached as Annex-G)

7. That the appellant by feeling aggrieved from the such termination order filed departmental appeal to the Deputy Inspector General of Police, Kohat Division on 31/12/2019, which was entertained by the respondent but without examining the record and available facts, rejected the departmental appeal without any cogent reasons on 27/02/2020.

(Copy of departmental appeal & order dated: 27/02/2020 are attached as Annex-H & I)

8. That the appellant by feeling aggrieved from the order of the respondent dated: 27/02/2020, moved revision petition to the competent authority i.e. Inspector General of Police Khyber Pakhtunkhwa on 11/03/2020 and challenged the impugned order but the competent authority again ignored the explanation of the appellant as well as the record showed by the appellant in his favour and rejected the revision petition on 27/09/2020.

(Copy of revision petition & order is attached as Annex-J & K)

9. That the appellant by feeling aggrieved from the impugned order dated: 27/09/2020 has no other alternate remedy but to file the instant service appeal on following grounds inter-alia: -

Grounds:

- A. That act of the respondents is illegal, against law, facts and natural justice, hence cannot be sustained in the eye of law.
- B. That the respondents had not performed their duties according to the law and have illegally ignored the appellant's explanation in favour of his stance alongwith the record in black and white.
- C. That the appellant submitted his arrival report on 10/10/2019 but same was not accepted and the respondents initiated departmental enquiry against the appellant and by ignoring the stance of the appellant issued impugned termination order that is major penalty as compare to the quantum of irregularity committed the appellant.
- D. That it is the violation of natural justice hence needs interference of this August Court.

- E. That the sudden killing incident as well as the disease of the appellant has been ignored by the respondent while conducting the departmental enquiry for which the documents are also shown to the enquiry officer but even than the authority impose a major penalty upon the appellant.
- F. That the absence of the appellant was not intentional nor deliberate but due to the sudden mishap for which the appellant was the only person to handle the situation in order to provide safety and protection to the himself as well as the whole family but the respondent never give any-attention to the fact on record and issued impugned order.
- G. That the respondents have not treated the appellant in accordance with law and rules on the subject and violate the Article 4 of the Constitution of Pakistan 1973.
- H. That the services of the appellant's father for police department will not be ignored which is solid proof for the loyalty and patriotism which is having the representation of the whole family for the appellant and the appellant also learned the same lesson from his father but intervening mishap jerk the mental capacity of the appellant and he has no other option but to escape from the scene till the arrest of the culprit of his sister but the respondents ignored the true facts and issued an impugned order in haphazard manner.
- I. That other grounds if any will be raised at the time of arguments with prior permission of this Hon'ble tribunal.

IT IS THEREFORE, PRAYED THAT ON ACCEPTANCE OF THIS APPEAL AN IMPUGNED TERMINATION ORDER DATED: 14/11/2019 & 27/02/2020 ISSUED BY THE RESPONDENTS MAY BE SET ASIDE AND THE RESPONDENTS ARE DIRECTED TO RE-INSTATE THE APPELLANT AGAINST THE SAME POST OF CONSTABLE INTO HIS SERVICES WITH ALL BACK BENEFITS.

ANY OTHER REMEDY IF THIS HON'BLE COURT DEEMS FIT
MAY GRACIOUSLY BE AWARDED.

APPELLANT

Dated: 27-10-20

Through



Athar Abbas
Advocates High Court,
Peshawar

BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

In Ref. _____
S.A. _____/2020

SAQIB SHAHEEN

APPELLANT

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA, THROUGH CHIEF
SECRETARY AND OTHERS

RESPONDENTS

AFFIDAVIT

I, Mr. Saqib Shaheen S/O Shaheen Islam R/O Latamber, District
Karak do hereby solemnly affirm and declare that the contents of the Service
Appeal are true and correct to the best of my knowledge and belief and
nothing has been concealed from this Hon'ble Tribunal.

Saqib Shaheen

DEPONENT

NIC No. 14202-4603102-8

Mobile No. 0348 0885168

[Signature]

ATTESTED

by

Athar Abbas Ad

Identified by:

[Signature]

Athar Abbas
Advocate High Court Peshawar

BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

In Ref:
S.A. _____/2020

SAQIB SHAHEEN

APPELLANT

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA, THROUGH CHIEF
SECRETARY AND OTHERS

RESPONDENTS

ADDRESSES OF PARTIES

APPELLANT

SAQIB SHAHEEN S/O SHAHEEN ISLAM (SHAHEED) R/O
LATAMBER DISTRICT, KARAK.


RESPONDENTS

1. GOVT: OF KHYBER PAKHTUNKHWA THROUGH CHIEF
SECRETARY, CIVIL SECRETARIAT PESHAWAR.
2. INSPECTOR GENERAL OF POLICE, GOVT: OF KHYBER
PAKHTUNKHWA, PESHAWAR.
3. DEPUTY INSPECTOR GENERAL OF POLICE, KOHAT DIVISION.
4. ASSISTANT INSPECTOR GENERAL OF POLICE, TRAINING
DIRECTORATE, KHYBER PAKHTUNKHWA.
5. DISTRICT POLICE OFFICER, DISTRICT KARAK.

APPELLANT

Dated: 27-10-20

Through


Athar Abbas
Advocates High Court,
Peshawar

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع سنت جرم قابل دست اندازی پولیس رپورٹ شدہ ریفرنس ۱۵۲ مجموعہ ضابطہ نوعداری

CTD

مطلع وقت تقریباً ۱۸:۱۴ وقت ۱۸:۳۰ بجے

28

جگہ کی تفصیل ۱۹۴

۱۸:۴۵ وقت

آرٹھ وقت رپورٹ

PPC 302 324 353 427 314 277A

ام و سکونت اطلاع دہندہ

میں پتہ اور سڑک پر کرائی ہوئی دکان کے نام

بائے وقت فاصلہ خانہ سے اور سمت

اس وقت تک اس کے خلاف ترمیم کی جا چکی ہے۔

ام و سکونت لازم

سڑک پر پتہ

کاروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا تو وجہ بیان کرے

لیونہ ایک تحریری اطلاع

خانہ سے روانگی کی تاریخ و وقت

مگن شیروان SHO تھا ابتدائی اطلاع پیش کیے گئے اور کراچی پولیس میں ۱۰ بجے کر کے درج کر کے ...

ATTESTED To be true copy of original

PTO

90
ORDER.

In exercise of powers vested in me under SI: No. 17.6 of the 3rd schedule to delegation of Powers under the Financial Rules and the Powers of re-appropriation Rules 2001 and in line with the prescribed policy, sanction is hereby accorded for the grant of Death Compensation noted against each:-

S.NO	NAME & NUMBER	AMOUNT
1	FC Muhammad Ibrahim No.1461	Rs.33,00,000/-
2	EXM/FC Shaheen Ul Islam No.6052/321	Rs.5,00,000/-

In the discharge of his duty during Bomb blast, encounter with dacoits, P.Os, Sectarian violence and agitations in the limits of Police Station, CTD.

The expenditure involved is debitable to the function 032102-Provincial Police (CA4016- Law & Order Charsadda) A01270-Other Compensation to Police Personnel injured/died in action and will be met out of the allocation made in the sanctioned budget grant for 2014-15.

Fund to the tune of Rs. 38,00,000/- (Three Million Eight Hundred Thousand Only) is allotted to the District Police Officer Charsadda. Out of function 032102-Provincial Police (Direction) A01270-Other Compensation for expenditure under function 032102-provincial Police (CA4016- Law & Order Charsadda) under the same object/code during the current financial year 2014-15.

-Sd-
(NASIR KHAN DURRANI)
Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.




No. 67-71 /Sh: D, dated Peshawar, the 15/11/2015.

ATTESTED

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

1. Dy. Inspector General of Police, Mardan Region Mardan w/r to his letter No.6493/GB dated 22.12.2014.
2. District Police Officer, Charsadda. (Please modify your budget grant accordingly)
3. District Account Officer, Charsadda.
4. Budget Assst. I CPO, Peshawar.

To be True
Copy of
original


(SABZ ALI KHAN)
Budget Officer,
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

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In compliance with the Police Policy Board (PPB order No.01/2013) vide
Police Officer, Khyber Pakhtunkhwa Peshawar Endst: No. 8111/E-IV, dated
15 and Memo: No. 8914/E-IV dated 24.07.2015 and Endst:No.2508/E-IV,
01/03/2016 Saqib Shaheen son of Shaheed Head, Constable Shaheen Islam
village Latamber Tehsil & District Karak having height 5' 10" & chest 31 1/2"
Age 10th Medically fit and of good moral character is hereby appointed as
Constable in BPS 05 (6985-340-17185) against the existing vacancy in quota of
Special and relaxation applied in deficiency cases vide in PPB order No.01/2013,
with immediate effect.

He is allotted Constabulary No.423

CPN No. 231
Date 18-4-2016

[Signature]
District Police Officer, Karak

OFFICE OF THE DISTRICT POLICE OFFICER, KARAK

MISS-56 /OHC, dated Karak Karak 18-4-2016

Copy of above is submitted for favour of information to:-

The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar w/r to above quoted
letters.

The Dy. Inspector General of Police, Kohat Region Kohat.

[Signature]
District Police Officer, Karak

ALL
ATTESTED
To be True
copy of original

Chief of Police Officer, K

TYPE-C-HOSPITAL CITY KARAK

Sent To:

OUT DOOR PATIENT TICKET

DHS-02(F)

District:

Karak

CRP No:

3960

Facility Name:

Name:

Sahib Shahreen

Age:

23

Sex:

W

Father's/Husband's Name:

Shahreen ul Islam

Monthly OPD Serial No:

4201

Provisional Diagnosis:

KK

Date

Clinical Findings/Investions/Treatment/Test Findings

A-J-E-D

Epilepsy

5-7-2019

try Valium 10 @

U2 Pladex 100mg

Tab Epival 1g

U, 1 + 1

Tab Tegrad

اندرال پ.ت.و

P.T.O

Ali

ATTESTED

To be true copy of original

14

063 W 2 1/2 10

Tab Neurobiol

063 W 2 1/2 10

① one months bed rest

SA

AM

15

Sent To: **OUT DOOR PATIENT TICKET** DHIS-02(B)

District: Karak CRP No: 3960

Facility Name: _____

Name: Saif ShahEen Age: 22-23 Sex: M

Father's/Husband's Name: ShahEen ul Islam

Monthly OPD Serial No: 4201

Provisional Diagnosis: KK

Date	Clinical Findings/Investions/Treatment/Test Findings
------	--

Patient History

5-7-2019

This patient suffering in
epilepsy last two years.
In the opinion of doctor
they will be test two and
three months completely
bed rest and regularly

Attest

ATTESTED

To be True
Copy of original

(16)

Use medicine the advice
of doctors

Amor

AM

17
FINAL SHOW CAUSE NOTICE.

PA(ENQ)
Dated 17/09/2019

1. I, NAUSHER KHAN, District Police Officer, Karak as competent authority under the Police Rule-1975 hereby serve you Recruit Constable Saqib Shaheen No. 610 Police Lines Karak as follow:-

That consequent upon the completion of enquiry conducted against you by Enquiry Officers Mr. Amjid Ali, SDPO Karak.

2. On going through the finding and recommendation of the Enquiry Officer and materials on the record and other connected papers including your defense before the said Enquiry Officer, the charge against you was proved and you have committed the following acts / omission specified in Police Rule-1975:-


"As per letter received from the Govt of Khyber Pakhtunkhwa Police Training School Swabi vide No. 441/GB dated 16.07.2019 that recruit Constable Saqib Shaheen No. 610 absented himself from on-going recruit course vide DD No. 13 dated 04.07.2019 till date without any leave or prior permission from the competent authority although he was re-joined to the on-going recruit course vide W/AIG Training Order No. 4916/Trg dated 26.06.2019 but recruit Constable failed to re-join the recruit training and repatriated as unqualified. Which are quite adverse on his part and shows his disinterest and irresponsibility in discharge of his official obligations. Such act on your part is against service discipline and amounts to gross misconduct."

3. As a result thereof I, as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Police Rule-1975.

4. You are therefore, required to Show Cause as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

5. If no reply to this Notice is received within Seven (07) days of its delivery in the normal course of circumstances, it will be considered/presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

6. Copy of findings of the Enquiry Officer is enclosed.


District Police Officer, Karak


ATTESTED

To be true

Copy of original

My this Order will dispose off the departmental enquiry of
Constable Saqib Shaheen No. 610 of this district Police.

Facts are that as per letter received from the Govt of Khyber Pakhtunkhwa Police Training School Swabi vide No. 441/GB dated 16.07.2019 that recruit Constable Saqib Shaheen No. 610 absented himself from on-going recruit course vide DD No. 13 dated 04.07.2019 to 02.08.019 without any leave or prior permission from the competent authority although he was re-joined to the on-going recruit course vide W/AIG Training Order No. 4916/Trg. dated 26.06.2019 but recruit Constable failed to re-join the recruit training and repatriated as unqualified. Which are quite adverse on his part and shows his disinterest and irresponsibility in discharge of his official obligations."

He was issued with Charge Sheet and Statement of allegations. Mr. Amjad Ali SDPO Karak was appointed as an Enquiry Officer to conduct proper departmental enquiry against him and to submit his findings within the stipulated time.

The Enquiry Officer reported that the defaulter recruit Constable Saqib Shaheen No. 610 is not interested in his official obligations. He absented himself from Police Lines Karak time to time and never rejoined his place of duties. The defaulter official is not fit for active Police Force duties and it cannot be hoped of becoming a good Police officer in future, therefore, the E.O recommended him terminated from service as per Police Rules 12.21. *enquiry officer*

He was issued with Final Show Cause Notice and properly served upon the accused recruit Constable, in response to the FSCN, the accused recruit Constable submitted his reply, which is found unsatisfactory. *ATTESTED To be True*

Keeping in view of the available record and facts on file, perusal of enquiry papers and recommendations of the Enquiry Officer, he is found guilty of the charges he did not take interest in his official obligations. Although, his order for re-joining was issued by the competent authority but the said recruit constable failed to report his training centre which shows his disinterest, carelessness and negligence in the discharge of his official obligations. He is not fit for Police Force, therefore, in exercise of power conferred upon me, I, **NAUSHER KHAN**, District Police Officer, Karak is hereby imposed a major punishment of removal/discharge from service upon the defaulter recruit Constable Saqib Shaheen No. 610 and his absence period of 97 days is treated as leave without pay.

OB.No. 509
Dated 14/11/2019

NAUSHER KHAN
District Police Officer, Karak

عنوان: اپیل برائے بحالی سروس

جناب عالی!

مودبانہ گزارش ہے کہ آپ صاحب کی توجہ ایک اہم مسئلہ کی جانب مبذول کرنا چاہتا ہوں۔

یہ کہ میں ثاقب شاہین ولد شاہین اسلام (شہید) اپنے والد کے شہید کوئٹہ پر محکمہ پولیس میں بھرتی ہوا۔

یہ کہ میں basic Course صوابی میں سرانجام دے رہا تھا کہ اسی دوران ٹریننگ میں مورخہ: 23.05.2019 کو مجھے تھانہ

لتمبر سے فون کال موصول ہوئی کہ آپ کی بہن کا قتل ہوا ہے آپ جلد از جلد گاؤں پہنچ جائے، گاؤں پہنچنے کے بعد ڈیفین ورسومات

کے بعد جب ملزم کے خلاف تھانہ لتمبر میں دعویداری FIR درج کی گئی جو کہ میرے خالہ زاد کے بیٹے پر تھی۔

میرے FIR درج کرنے کے بعد ہمارے مابین تنازعات بڑھ گئے اور وہ لوگ میری جان کی پیچھے پڑ گئے میں نے اپنے گھر بار

چھوڑ کر رشتہ داروں کے گھر پناہ لی اور اسی دوران میں محکمہ سے غیر حاضر رہا تا کہ مجھے اور میری فیملی کو مزید پریشانی کا سامنا نہ کرنا

پڑے۔ غیر حاضر رہنے پر انکو آڑی بٹھائی گئی جس کی نتیجے میں مجھے نوکری سے برخاست کیا گیا اور Reapeal کی تائید کی گئی۔

آپ صاحبان سے گزارشات ہے کہ اس مشکل وقت میں میرا ساتھ دیں اور میری نوکری کے جائز احکامات صادر فرمائیں۔ ہم آپ

صاحبان کیلئے تا عمر ڈعا گورینگے۔

شکریہ

عین نوازش ہوگی۔

مورخہ: 31.12.2019

العارض

Naqib Shaheen

ثاقب شاہین ولد شاہین اسلام (شہید) بیلٹ نمبر 610 ضلع کرک

شناختی کارڈ نمبر: 14202-4603102-9

موبائل نمبر: 0348-0885168

ATTESTED

To be True

Copy of original

ORDER

4/3/2020

This order will dispose of a departmental appeal, moved by Ex-Recruit Constable Saqib Shaheen No. 610 of Operation Staff Karak against the punishment order, passed by DPO Karak vide OB No. 500, dated 14.11.2019 whereby he was awarded major punishment of removal / discharge from service on the following allegations:-

The appellant was detailed for Basic Recruit Training at Swabi; however, as per letter of PTS Swabi vide No. 441/GB, dated 16.07.2019 that the appellant has absented himself from on-going recruit course from 04.07.2019 to 02.08.2019. He was rejoined to the court by AIG/Training but he failed to do so and repatriated as unqualified. It is to mention here that previously he was Removed from Service by DPO Karak on the same allegations and his appeal was rejected by the then DIG/Kohat. However, by accepting his appeal, he was reinstated into service by CPO Peshawar on humanitarian grounds being son of Shaheed.

He preferred an appeal to the undersigned, upon which comments were obtained from DPO Karak and his service record was perused. He was also heard in person in Orderly Room, held on 27.02.2020. During hearing, he did not advance any plausible explanation in his defense to prove his innocence and just forwarded lame excuses.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved beyond any shadow of doubt and the same has also been established by the E.O in his findings. Therefore, his appeal being devoid of merits is hereby rejected.

Order Announced
27.02.2020

Handwritten signature

Handwritten signature

Handwritten notes:
ATTESTED
To be True
copy of original

Handwritten signature
District Police Officer
Karak

(TAYYAB HAFEEZ) PSP
Region Police Officer,
Kohat Region.

No. 247 /EC, dated Kohat the 27-2-2020.

Copy to District Police Officer, Karak for information w/r to his office Letter No. 195/EC, dated 06.01.2020. His Service Roll & Fauji Missal is returned herewith.

Handwritten signature

(TAYYAB HAFEEZ) PSP
Region Police Officer,
Kohat Region.

جناب عالی!

السلام علیکم!

جناب انسپٹر جنرل آف پولیس صاحب میں سائل ثاقب شاہین ولد شاہین اسلام (شہید) یہ کہ میں اپنے والد صاحب کی شہید کوٹہ پر محکمہ پولیس میں بطور کنسٹیبل بھرتی ہوا۔ اور Basic Course صوابی میں سرانجام دے رہا تھا کہ اسی دوران مورخہ: 23.05.2019 کو تھانہ لٹمبر سے فون کال موصول ہوئی کہ آپ کی بہن کو کسی نے قتل کی ہے۔ اور آپ جلد از جلد پہنچ جائے۔ اسی واقعہ کے دوران میں پولیس ٹریننگ صوابی سے ضلع واپس ہوا کیونکہ قاتل میرے اپنے ہی نکلیں اور اس کے خلاف دعویداری ایف آئی آر تھانہ لٹمبر میں درج کی گئی۔

یہ کہ جناب میرے والدین صاحبان کافی عرصہ پہلے بقضائے الہی وفات پا چکے ہیں۔ اور میں ہی اپنے بہنوں کا ایک بھائی ہوں دعویداری ایف آئی آر کے بعد وہ لوگ میرے جان کی پیچھے پڑ گئے تھے اور میں نے اپنے گھر بار چھوڑ کر اپنے رشتہ دار کے گھر پناہ لی اور اسی دوران میں محکمہ سے غیر حاضر رہا۔ جب حالت بہتر ہو گئے اور ملزم کی گرفتاری یقینی بنائی گئی تو میں نے پولیس لائن میں حاضری دی اور میرے اوپر انکوٹری بنائی گئی اور مجھے ملازمت سے برخاست کر دیا گیا اور جناب DIG صاحب کو اپیل کی تائید کی گئی۔ اس کے بعد DIG صاحب نے مجھے آپ صاحبان کے ہاں کیس کی مزید Process کرنے کو کہا۔

جناب عالی! آپ صاحبان سے یہ التجا کی جاتی ہے کہ سائل کے جائز بحالی کے احکامات صادر فرمائیں سائل آپ صاحب کیلئے تا عمر دعا گو رہیگا۔

عین نوازش ہوگی۔

مورخہ: 11.03.2020

العارض

ثاقب شاہین ولد شاہین اسلام (شہید) پلاٹ نمبر 610 ڈسٹرکٹ کرک

موبائل: 0348-0885168

Attested
To be True
copy of original

375
No. SI 3700

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-FC Saqib Shaheen No. 610. The petitioner was removed/discharged from service by District Police Officer, Karak vide OB No. 500, dated 14.11.2019 on the allegations that he was detailed for Basic Recruit Training at Swabi, however, as per letter of Police Training School, Swabi vide No. 441/GB, dated 16.07.2019, he had absented himself from on-going recruit course from 04.07.2019 to 02.08.2019. He was rejoined to the course by AIG/Training but he failed to do so and repatriated as unqualified. He reported arrival on 10.10.2019 in Police Lines, Karak and remained absent for total 97 days. It is to mention here that previously he was removed from service by DPO Karak on the same allegations and his appeal was rejected by the then DIG/Kohat. However, he was reinstated into service by CPO Peshawar on humanitarian grounds being son of shaheed. His appeal was rejected by Regional Police Officer, Kohat vide order Endst: No. 3247/EC, dated 03.03.2020.

Meeting of Appellate Board was held on 24.08.2020 wherein petitioner was heard in person. During hearing petitioner failed to advance plausible explanation in rebuttal of the charges.

Perusal of the record reveals that the petitioner was earlier removed from service vide order bearing OB No. 453, dated 08.08.2017 on the same allegations which establishes that he is habitual absentee and there is no prospects of mending his ways. The Board see no ground and reasons for acceptance of his petition, therefore, the Board decided that his petition is hereby rejected.

This order is issued with the approval by the Competent Authority.

EC
2/11

Handwritten signature and initials

No. SI 3701 of 20

Sd/-

DR. ISHTIAQ AHMED, PSP/PPM
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

ATTESTED
TO BE TRUE
Handwritten signature

Copy of the above is forwarded to the:

1. Regional Police Officer, Kohat. One Service Roll and one Fauji Missal of the above named Ex-FC received vide your office Memo: No. 2672/EC, dated 16.06.2020 is returned herewith for your office record.
2. District Police Officer, Karak.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl. IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

DPO/KARAK




For n/a along with
Service Roll & Fauji
Missal.

Handwritten initials

Handwritten signature and stamp: DIG POLICE KOHAT


Handwritten notes: no 14083 Rec do 6/19/20

(KASHIF ZULFIQAR) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

تاریخ 50	65913			
ایڈوکیٹ: <u>اطہر عباس</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <u>bc-10-9108</u>		رابطہ نمبر:		

Service Tribunal K.P. Peshawar

بعدالت جناب:

مخائب: <u>Appellant</u>	دعویٰ: <u>سروس اپیل</u>
 <p>نام: <u>سابقہ شاہین</u> بنام</p>	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____

باعت تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام پشاور اسکریٹڈ اطہر عباس و محمد فیاض کے واسطے پیروی و جواب دہی کارروائی مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلیف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر راجحہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 27-10-20

 DESHAWAR BAR ASSOCIATION
 KHYBER PAKHTUNKHWA

مقام سروس ٹرانسپونل کے آفیسر، پشاور کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔

Attested & Accepted

by


Saqib Shahwan

"A"

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

SB

APPEAL No. 14/225 of 20 20

Saqib Shaheen

Appellant/Petitioner

Versus

Through chief Secy Pesh:

RESPONDENT(S)

Saqib Shaheen s/o Shaheen

Notice to Appellant/Petitioner

Islam (Shaheed) R/o Latamber Distt:
Karak.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 24/11/2021 at 9.00 AM

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

To deposit security & process fee within 3 days.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No.

Appeal No. 14225 of 20 20

Saqib Shahoon Appellant/Petitioner

Versus

Govt. of KPK Chief Secy. Respondent

Respondent No. 3

Notice to: —

Deputy Inspector General of Police Kohat Division.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 19/11/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 7th

Day of Dec 20 21

(for Reply)

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"A"

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

SB

No. Repa

APPEAL No. 14/225 of 20 20

Saqib Shaheen

Appellant/Petitioner

Versus

Through chief Secy Pesh:

RESPONDENT(S)

Saqib Shaheen s/o Shaheen


Notice to Appellant/Petitioner

Islam (Shaheed) R/o Lalambex Distt:
Karak.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 24/11/2021 at 9:00 AM

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

To deposit Security & Process fee within 3 days.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“B”

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

No.

Appeal No. 14/225 of 20 20

Saqib Shahzad Appellant/Petitioner

Chief of KPK (Chief Secy) Respondent

Respondent No. 5

Notice to:

Distt. Police Officer Distt. Korak.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 19/1/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 7-12

Day of Dec 20 21

(For Reply)



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

No.

Appeal No. 14,225 of 20 20

Saavib Shahreen Appellant/Petitioner

Versus

Comr. CF W/Pu Chief Sup. Respondent

Respondent No. 4

Notice to: —

Assistant Inspector General CF Police
Training Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 19/1/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

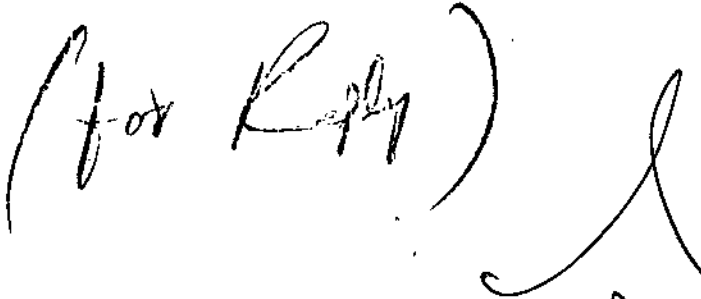
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 7/12

Day of Dec 20 21

(for Reply)




Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. *16/225* of 20 *20*

Saqib Shahreen Appellant/Petitioner

Court of CPK Chief Secy. Respondent

Respondent No. *2*

Notice to: *Inspector General of Police Court of CPK Peshawar.*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *19/1/2021* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

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

Given under my hand and the seal of this Court, at Peshawar this *7/1*

Day of *Dec* 20 *21*

(for Reply)

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

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

"B"

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

No.

Appeal No. 14 225 of 20 20
Saavito Shahen Appellant/Petitioner

Court of KPK through Chief Secy. Respondent

Respondent No.

Notice to: —

Court of KPK through Chief Secretary
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 19/1/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.


Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

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

Given under my hand and the seal of this Court, at Peshawar this 7/11

Day of Dec 20 21

(for Reply)



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.


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BEFORE HON'BLE SERVICE TRIBUNAL K.P PESHAWAR.

SAGIB SHAHEEN Vs Govt of K.P.K.

Application for granting permission to the appellant to deposit security amount as per direction of the Hon'ble Tribunal.

Respectfully Sheweth:

- 1- The appellant most humbly submits that
- the appellant was informed through notice to deposit security amount in the instant appeal.
2. That unfortunately the appellant received the notice very late and the appeal in hand is fixed for today i.e 24-11-21 before S.B.


It is therefore requested that on acceptance of this application the appellant may kindly be allowed to deposit security amount.

Dated: 24-11-21

Appellant
Through Amal
Attes Abber A D