

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7452/2021

Date of Institution ... 24.09.2021

Date of Decision ... 19.01.2022

Zamir Khan R/o Pind Gujran District Haripur.

... (Appellant)

VERSUS

Inspector General of Police Khyber Pakhtunkhwa, Peshawar and others.

... (Respondents)

Syed Noman Ali Bukhari & Uzma Syed,
Advocates

... For Appellant

Muhammad Rasheed.
Deputy District Attorney

... For respondents

AHMAD SULTAN TAREEN ...
ATIQU-UR-REHMAN WAZIR ...

CHAIRMAN
MEMBER (EXECUTIVE)

JUDGMENT

ATIQU-UR-REHMAN WAZIR MEMBER (E):-

Brief facts of the case

are that the appellant while serving as Sub-Inspector in Police Department submitted application for his retirement on medical grounds, which was accepted and the appellant was retired vide order dated 27-03-2013. Under rule-4 of Sub-rule-10 of Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the appellant filed service appeal before the authorities for recruitment of his son under the rules ibid, which was not responded, hence the instant service appeal with prayers that son of the appellant may be appointed against son quota under rule-4 sub-rule-10 of the rules ibid.

02. Learned counsel for the appellant has contended that the appellant submitted application for his retirement on medical grounds as the appellant was


suffering from a heart disease and to this effect, the appellant had submitted all his medical prescriptions with his appeal, which was accepted but in order of his retirement, there is no mention of his retirement on medical grounds, which shows malafide of the respondents to the effect that his son was kept deprived of appointment against the quota reserved for employees retired on medical grounds; that under sub-rule-4 of rule-10 of civil servants (Appointment, Promotion & Transfer) Rules, 1989, the appellant is entitled for appointment of his son under the quota reserved for the purpose.


03. Learned Deputy District Attorney for the respondents has contended that the appellant has served for more than 31 years, hence he submitted appeal for his retirement, which was accepted and the appellant was retired from service vide order dated 27-03-2013; that the appellant was not retired on medical ground, hence his appeal is not based on facts, therefore not tenable and liable to be dismissed.

04. We have heard learned counsel for the parties and have perused the record.

05. Record would suggest that the appellant submitted application for retirement on medical grounds and to this effect had also submitted medical prescriptions, which would show that the appellant was under treatment for his heart issues, but the order of his retirement does not contain any thing about his retirement on medical grounds, which might be malafide on part of the respondents, hence we are constrained to remit the case to the respondents to examine such aspect of the case and if the appellant deserve the benefit, the same shall be extended to him. His case shall be decided within 60 days and appropriate order be passed. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
19.01.2022


(AHMAD SULTAN TAREEN)
CHAIRMAN

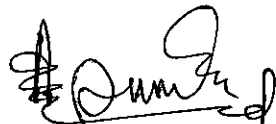

(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

ORDER
19.01.2022

Learned counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, we are constrained to remit the case to the respondents to examine such aspect of the case and if the appellant deserve the benefit, the same shall be extended to him. His case shall be decided within 60 days and appropriate order be passed. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
19.01.2022



(AHMAD SULTAN TAREEN)
CHAIRMAN



(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

16.12.2021 None for the appellant present. Mr. Kabirullah Khattak, Addl: AG along with Mr. Sher-Afzal, SI for respondents present.

Written reply/comments on behalf of respondents submitted through office which is placed on file. Adjourned To come up for arguments on 11.01.2022 before D.B.


(MIAN MUHAMMAD)
MEMBER (E)

11.01.2022 Due to non-availability of D.B, case is adjourned to 14.04.2022 for the same as before.


Reader

18.01.2022 Uzma Syeda, Advocate/counsel for the appellant present. Mr. Muhammad Rasheed, DDA along with Jamil Ahmad, HC for respondents present.

Arguments heard. To come up for order on 19.01.2022 before this D.B.

(Atiq-Ur-Renman Wazir)
Member (E)

Chairman



20.10.2021

Appellant in person present. Preliminary arguments heard.

Points raised in the Memorandum of appeal need consideration. The appeal is admitted for full hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

Appellant Deposited
Security & Process Fee

20/10/21


Chairman

03.12.2021

None for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Basit Ali, HC for respondents present.

Written reply/comments on behalf of respondents submitted which is placed on file. Adjourned. To come up for arguments on 16.12.2021 before D.B.




(MIAN MUHAMMAD)
MEMBER (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7452 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/09/2021	<p>The appeal of Mr. Zamurd Khan resubmitted today by Syed Noman Ali Bukhari 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>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>20/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Mr. Zamurd Khan r/o Pind Gujran District Haripur received today i.e. on 24.09.2021 is incomplete on the following score which is returned to the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal is unsigned.
- 2- Copy of standing order no. 2/2020 is illegible which may be replaced by legible/better one.
- 3- Copy of application mentioned in para-1 of the memo of appeal submitted by the appellants for his retirement is not attached with the appeal which may be placed on it.
- ④- Copy of impugned order is not attached with the appeal which may be placed on it.
- 5- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 6- Appeal may be page marked according to the index.
- 7- Check list in respect of appellants is not attached.

No. _____/S.T,

Dt. _____/2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Zamurd Khan appellants.

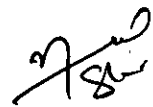
Siv,

1-3 All the objections are to be resubmitted



4. No impugned order has been passed against the appellants, the appellants claim approval of his son under Rule 10 sub class - 4.

The appeal may be put up to the court.



**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: _____ vs _____

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Zamrud Khan</u>	✓	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?		
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?		
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?		
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?		
21.	Whether addresses of parties given are complete?		
22.	Whether index filed?		
23.	Whether index is correct?		
24.	Whether Security and Process Fee deposited? on _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on _____		
26.	Whether copies of comments/reply/rejoinder submitted? on _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: _____

Zamrud Khan

Signature: _____

Zamrud Khan

Dated: _____

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____/2021

Zamrud Khan (Appellant)

VERSUS

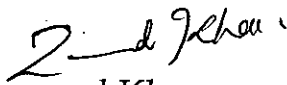
Inspector General of Police, Khyber Pakhtunkhwa Peshawar
and others (Respondents)

INDEX

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-3
2.	Affidavit		4
3.	Addresses of Parties		5
4.	Copies of applications	A	6-07
4.	Copy of the medicals	B	08-23
5.	Copy of retirement order	C	24-26
6.	Copy of standing order	D	27-29
7.	Copy of appeal	E	30-32
5.	Copy of edu document	F	33-37

Dated 22/09/2021

Appellant
(in person)


Zamrud Khan
Cell No. 0300-5059838

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

①

Service Appeal No. 7452 / 2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7636

Zamurd Khan R/o Pind Gujran District Haripur

Dated 24/9/2021

..... (Appellant)

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa ,
Peshawar.
2. Regional Police Officer/DIG Hazara Division, Khyber
Pakhtunkhwa .
3. District Police Officer, Haripur

..... (Respondents)

**APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974**

Respectfully Sheweth:

- 1- That appellant is law abiding citizen of Pakistan.
- 2- That appellant was appointed as Constable in Police
Department on 25/11/1981.
- 3- That on 22/03/2013 made on application to
Respondent No. 3/DPO Haripur for his retirement
on medical basis, which was accepted and was
retired on medical grounds form service. (Copies of
applications, Medical reports and retirement order
are attached as Annexure "A, B & C").
4. That under Sub Rule 4 of Rule 10 of KPK Civil
Servants (Appointment, Posting and Transfer Rules

Filed to-day
Registrar
24/9/2021

Re-submitted to-day
and filed.

Registrar

1989), where a Civil Servant died or incapacitated or invalidated permanently during service or retired on medical board, the appointing authority may appoint one of the children of such civil servant to a post of any basis pay scale 03 to 11 in a provincial cadre post and basis pay scale 03 to 12 in District Cadre Post. **(Copy of standing order is attached as annexure-"D").**

5. That son of appellant submitted applications to Department/respondents for his appointment under above mentioned rules but of no use. **(Copy of departmental appeal is attached as annexure-E).**
6. That son of appellant is qualified upto Matric. **(Copies of educational documents are attached as annexure "F").**
7. That superior Courts in number of Judgments, directed the government to appoint the person on concerned quota according to his qualification and the son of appellant Husnain Zamrud being similarly placed is also entitled for same relief.
8. That son of appellant was fit for appointment as constable, it is further mentioned that at the time of submitting application to concerned quarter, the son of appellant was aged about 19 years.

It is therefore humbly prayed that on acceptance of this appeal the respondent may please be directed to appoint the son of appellant namely Husnain Zamrud on son quota under Rule-10 sub Rule 4 of KPK Civil Servant (Appointment posting and transfer Rules 1989. Any other remedy

3

which deems fit and appropriate may also be awarded
in favor of appellant.

Appellant
(In Person)


Zamrud Khan

Dated:22/09/2021

(4)

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. _____ of 2021

Zamrud KhanAppellant

VERSUS

Inspector General of Police Khyber Pakhtunkhwa Peshawar and
others Respondents

ADDRESSES OF THE PARTIES

APPELLANT

Zamrud Khan R/o Pind Gujra District Haripur District Haripur.

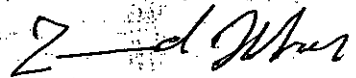
RESPONDENTS

- 1- Inspector General of Police Khyber Pakhtunkhwa Peshawar.
- 2- Regional Police Officer/DIG Hazara Division, Khyber Pakhtunkhwa.
- 3- District Police Officer Haripur.

Dated 22/09/2021

Appellant
(in person)

Zamrud Khan



8

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. _____ of 2021

Zamrud KhanAppellant

VERSUS

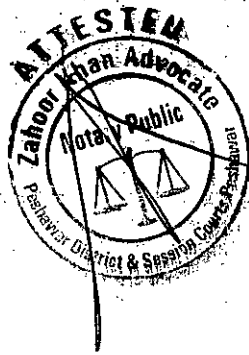
Inspector General of Police, Khyber Pakhtunkhwa Peshawar and
others Respondents

AFFDIVIT

I, Zamrud Khan R/o Pind Gujran, District Haripur, do here by
solemnly affirm and declare that the contents of the Service
Appeal are true and correct to the best of my knowledge and
nothing has been concealed from this Hon' able Tribunal.

Deponent

CNIC No. 13302-0434144-9



⊙

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فہم حال

⊙

81
 25
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 04
 31
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 13

S.S. Inyeta
 2000000000
 25.11.1981
 7-4-16.98
 may be accepted
 25/11/2013

Yes

Signature

S. S.

Submitted for
 favour of order please
 H/EC-170
 For report
 22/03/13

قسمت

۲۲۰

فیس

۱۱۸/۱۱۸

صاحب

اردی توام

بے آئینہ صاحب

کار

B.No. 156
29/3/743

ملازمت جبری کم سے صرف
۲۵۱۳/۵۴
۲۳۱/۱۱
۲۳۱/۱۱
ملازمت جبری کم سے صرف
۲۵۱۳/۵۴
۲۳۱/۱۱
۲۳۱/۱۱

۱۱۸/۱۱۸
۲۹-۰۳-۱۹۷۳

63
B1

CTC
Khan

EMERGENCY TELEPHONE

AFIC EXCHANGE

051-9271002

561-31114

561-33236

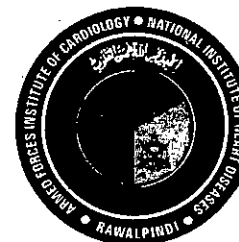
EMERGENCY RECEPTION

051-9271020

561-33911

561-32236

CARDIAC SURGERY
Unit-I
Tuesday-Thursday



AFIC-F-38

ARMED FORCES INSTITUTE OF CARDIOLOGY & NATIONAL INSTITUTE OF HEART DISEASES RAWALPINDI

DISCHARGE BOOK

Patient's Name : Mr. Javed Khan
Status / Ranks : _____ Process No _____
Unit / Deptt : _____
Age : 52 Sex M
A & D Register No : 1
NIC No :

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Address : _____

Telephone No Off : _____ Res: _____
Disease 1. IVCD + CABG (M) (M)
2. _____
3. _____

	Date of Admission	Date of Discharge
1st	<u>2/1/12</u>	<u>6/8/12</u>
2nd	_____	_____
3rd	_____	_____
4th	_____	_____
M.O	_____	_____

Registrar DR. KAUKAR NAJIB
Med Off AFIC/NIH

Consultant _____

5

Jan 11/12

2

Employment Status	Duration	Particulars of Job
Govt employed		
Self employed		
Non employed		
History of sudden death in family		
History of hyperlipidaemia		
History of inter mittent caludication		
Any addiction		
Anticouglant Status		
Any other relevant Information		

PHYSICAL EXAM

Temp 98.6°f Pulse 72/min Radial 72/min 100/10 BP 16/min Resp 16/min

Femoral

JVP Edema Cyanosis Clubbing

Xanthelasma Xanthomas Any Other

C.V.S.	Apex Beat	Thrill	Heart Sounds	Murmur	Pericardial rub	Any Other

Resp Sys

GIT

CNS

Hb = 9.7 g/dl
 Tlc = 23 x 10⁹/L
 Pct = 122 x 10⁹/L

Bldgp B +ve
 Cr clearance 87.5 ml/min
 Virology -ve
 INVESTIGATION (HepB & C)

ECG: { On Adm:
 On Disch:

Cardiac Enzymes :
 Serum Urea :

Serum Creat :
 Serum LETs :

Serum Uric Acid :
 Blood Sugar :

Coagulation Profile :
 Serum Lipid Profile :

X-Ray Chest: { On Adm:
 On Disch:

2D-Echo :

ET-60%

E.T.T

normal sized cardiac chambers
 Good LV junction valve (n)
 no clot

NO PE

Condition of Discharge:

Stable

Treatment to Continue after discharge:

Desprin 75mg 1-0-0
2 times a day

Tab. Canide 625mg 1/2 B/D

Follow Up Cardiac Rehabilitation: P/B on plate

Tab. Spiride 100mg 1-0-0

Desprin 75mg 1-0-0

10
Alum
C/O

Tab. Paracetamol 600mg 2 TDS
دو گوی ل - پیر - سا

FOLLOW UP

Tab. Atenolol 50mg 1-0-0
اینا 1/0

Susp. Cremaffin RTSF x HS
دو گوی ل - پیر - سا

Tab. Daonil 500mg 1-0-0

Glucophage 850mg TDS
دو گوی ل - پیر - سا

Fit for Discharge on 08/9/12

Recommended s/leave
XDB WEEK 3

Follow up in OPD after 01 week

کارڈیال ریہیبیلیٹیشن شروع میں درج ذیل ایما - پیر - سا

(DR. KAUKAB MAJID)
Med Offr AECNH

(=)

FOLLOW UP

10.5.11

Dr. Asif Ali Khan

Syn 167

Devised 5)

9.9.11 =

Copy Review

4)

1-1

Patrol - C

1-1-1

FOLLOW UP

Continued 1)

3.11.11

Paramount

1-1-1

Maj Gen (R)
ASIF ALI KHAN, HI (M)
M.B.B.S, F.C.P.S., Part F.R.C.S (Edn)
Professor AM College
Adult & Paeds Cardiac Surgeon

FOLLOW UP

(10)

1888

Apr 1-7

275
11/11/11

15 days

Review 14/15

2)

1-1

1888
1888
1888
1888
1888
1888
1888
1888
1888
1888

17/15

1-1

17/15

FOLLOW UP

Spw - d 4) (10)

1-1

Review 28

2)

1-1

17/15

1-1

17/15

1888
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✓ = Daamit 27 15

20/12/15
FOLLOW UP

FOLLOW UP

Duphanda Surpin (1)

20-12-15

Punster 20-20

1-1-1

20/12

Remin stika i van 5

Maj Gen (R)
ASIF ALI KHAN, M (M)
M.B.B.S, F.C.P.S. (Pak) F.R.C.S (Ed)
Professor A.M. College
Adult & Paeds Cardiac Surgeon

(13)

20/12/15

14

A

Surgeon

Gul Badshah SI (M) R

M.B.B.S., M.C.P.S., F.R.C.S.
CERTIFICATE NEURO SURGERY (UK)
Ex. Professor of Neurosurgery
Army Medical College, Rwp.
Ex. Adviser in Neuro Surgery
Pakistan Armed Forces

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi
Ph: 051-5466227-5466228
Res: 051-5592744

Date: 23-11-14

Rx

Hep: Zamrud Khan 56yr
Police Subordinate 2012

140/80/143
100/65

10 - Pain RL leg - 15yr
↑ 1yr = ↓ weakness ↑ streg

PMH, 2012 Heart surgery - AFIC -
Sup (+) - GMIK AP (-) RTA,
IE - simulated Ficki WT
Sore all over neck
SIR 80 RT 90 LK
Nutt - Quill

CTC
HWD

sy. disease - TDT Syden
gynaecia (late) = ↓ (56)

MAZI, March 2012 mild disc
(5-31)

(Excise disc 4 & 5 of 8/3 Def - Kordic)

Original, grandis col. P. J. J. J.

② Dulman SR cy

o Dingine p

c. Ann came
373

d Long and 39

d Eff. fun 254

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2 1/2

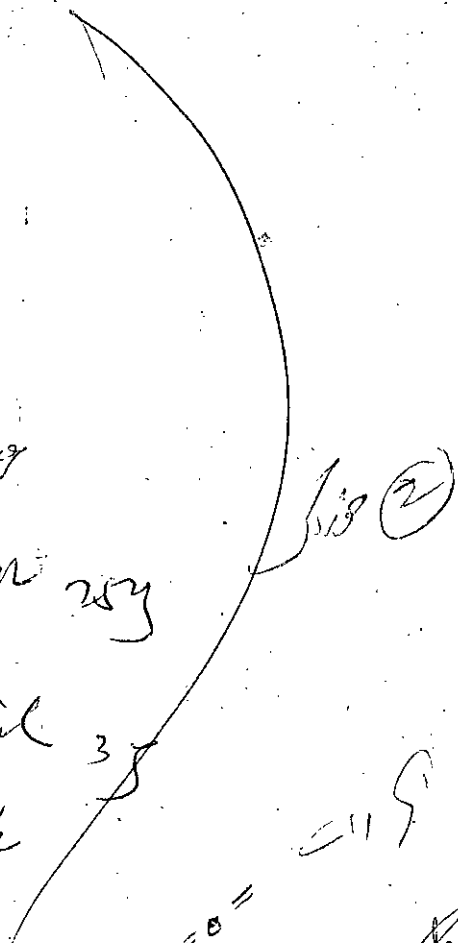


Fig ②

== 119
== 98

no
111
1
3
3
8

mi

2313
OP
75

Ex. Adviser

Gul Badshah SI (M) R

M.B.B.S., M.C.P.S., F.R.C.S.
CERTIFICATE NEURO SURGERY (UK)
Ex. Professor of Neurosurgery
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441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi
Ph: 051-5466227-5466228
Res: 051-5592744

Date: 24/11/14

Rx

Meg: Zamrud ka kr

Bata

180/120 lte

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

Widax 100 lte
 Moxycel 200 lte
 Galaxel lte
 Lonsorex lte
 Eftaflox 500 lte - 3 qd
 Indool 40 lte
 Subex 1/2 + 1/2) 6 qd

11
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 11

29 نومبر 2014

CTC
 Amir

cancel MUA - I que

16

2

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Brigadier Dr.

Gul Badshah SI (M) R

M.B.B.S., M.C.P.S., F.R.C.S.

CERTIFICATE NEURO SURGERY (UK)

Ex. Professor of Neurosurgery

Army Medical College, Rwp.

Ex. Adviser in Neuro Surgery

Pakistan Armed Forces

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi.

Ph: 051-5466227-5466228

Res: 051-5592744

Date: 01-2-16

Ref: Zamarad leave

Rx

120/80/45

Rice

گندم - شکر - روغن

1

2

Widom 100 ml

3

Moval 20 1+1

4

Calucil 1+1

11
0
11
11
11

5

Lansomex 1+1

6

Mobil 1+1

7

Prothindol 25 1+1

7

Spironolol 99

سپرونولول

8 فروری
سیدنا امیر

CFC
Amir

89

Brigadier

Gul Badshah SI (M) R

M.B.B.S., M.C.P.S., F.R.C.S.

CERTIFICATE NEURO SURGERY (UK)

Ex. Professor of Neurosurgery

Army Medical College, Rwp.

Ex. Adviser in Neuro Surgery

Pakistan Armed Forces

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi

Ph: 051-5466227-5466228

Res: 051-5592744

Date: 31-1-16

Rx

Reg: Samarad Kati

140/30119

Beu

Cl. Swelling Rt foot

Pain neck

① LE on mild Full in wt seen
all over the right foot

Pain right side neck

dysphagia
gynaecology

be

spe
45-6

Cont. rna. (S2) Don

Ev. m. i. s. f. r. s.

① Vohem 50g 2m (cap)

② Dingen 5 2m

③ Marcaine 2m

④ Lanzom 3g

⑤ M. i. s. f. r. s.

CTC
Amir

②
J.P.

for
5011
to

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

(18)

(B)

Brigadier Dr.

Gul Badshah SI (M) R

M.B.B.S., M.C.P.S., F.R.C.S.
CERTIFICATE NEURO SURGERY (UK)

Ex. Professor of Neurosurgery
Army Medical College, Rwp.
Ex. Adviser in Neuro Surgery
Pakistan Armed Forces

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhal More Round About, Rawalpindi.
Ph: 051-5466227-5466228
Res: 051-5592744

Date: 28-12-15

Ref: Zamruud. Kex.

Rx

Mof. Hs

2 to numb of foot

- ① G - 10 - 100 1+
- ② Nilax 100 1+
- ③ Moxocle 200 1+
- ④ Coctrel 1+
- ⑤ Lousomax 1+
- ⑥ Drollicol 25 1+
- ⑦ A.B.D 2+2
- ⑧ Mobil 1+

11
0 11
11 0
11

Handwritten notes in Urdu script.

Handwritten signature.

6 of

Dr. **Muhammad Tahir**
M.B.B.S. M.C.P.S,
M.S.(ADVANCE NEURO SURGERY)
CERTIFICATE NEURO SURGERY

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi.
Ph: 051-5466227-5466228
Res: 051-5154014

Date: 13/12/15

RX

Dr. Tahir Khan

130 Surgery
Level 2 of the ... F.P.S.
Level 2 of the ... F.P.S.

Handwritten notes and diagrams in the center, including a large bracketed area and some illegible text.

- C. Diabron SR
- C. Nabil M-
- C. Nabil
- C. Miramie
- C. Kyamazy
- C. Nabil
- C. P. (Handwritten)
- C. A & S

10

Handwritten marks

CPC
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بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Dr.
Muhammad Tahir
M.B.B.S. M.C.P.S.,
M.S.(ADVANCE NEURO SURGERY)
CERTIFICATE NEURO SURGERY

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi.

Ph: 051-5466227-5466228

Res: 051-5154014

Date: 9/12/15

Rx

G. Muhammad Khan

(160) 100 #

186

Dr. Muhammad Tahir
Korona Virus

○ Nence F 50g @ x 3 days.

○ Diltiazem R 10g

○ Nubol 10g

○ Mucaine m

○ Lenzamin 30g

○ Mabil

○ P (Edinon)

○

All of 25g

G. Khan

10/12/15

CPC
HMD
14
10/12/15
CPC

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

21

A

hammad Tahir

M.C.P.S,
ADVANCE NEURO SURGERY)
FICATE NEURO SURGERY

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi.
Ph: 051-5466227-5466228
Res: 051-5154014

Date: 8/12/15

Rx

H. Lamard Khan

① (⇒ Ex & anal in day Def (Needle)
⇒ anal day low thro T.P C6

(Laxative) in 40y to 50y

فول، سیر، سیر

① Nucef 300

① Diltiazem SR 120

① Digoxin P

① Anacardic m

① Lanzan 37

① Niblit

① P (Pantoprazole) 35

2

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Handwritten notes on the bottom left margin.

29

10

Brigadier

Gul Badshah SI (M) R

M.B.B.S., M.C.P.S., F.R.C.S.
CERTIFICATE NEURO SURGERY (UK)
Ex. Professor of Neurosurgery
Army Medical College, Rwp.
Ex. Adviser in Neuro Surgery
Pakistan Armed Forces

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi
Ph: 051-5466227-5466228
Res: 051-5592744

Date: 30-11-11

Rx

Ho pi zamarud ker.

BP, 120/80

Bice

1

کتبہ - اوچی سے دل درج

2

Widex 1w 1+1

3

Movelle cap 200 1+1

4

Coartem 1+1

5

Lansone x 1+1

6

+ Indoval 40 1+1

7

Surbet T: 1/2 + 1/2

Local us + TK TAG
15

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Handwritten signature.

Handwritten notes in Urdu.

Handwritten notes in Urdu.

(B)

(B)

Brigadier

Gul Badshah SI (M) R
M.B.B.S., M.C.P.S., F.R.C.S.
CERTIFICATE NEURO SURGERY (UK)
Ex. Professor of Neurosurgery
Army Medical College, Rwp.
Ex. Adviser in Neuro Surgery
Pakistan Armed Forces

AMJAD MEDICAL CENTRE

441/11-12, Mehrabad, Main Peshawar Road
Near Pirwidhai More Round About, Rawalpindi
Ph: 051-5466227-5466228
Res: 051-5592744

Date: 29-11-14

Rx 146/gotts Mapi Zamrod 1000

done (Lumba TUSA)

(4)

CB

Q. Diclewan R 40g

Q. Dingem p 200

Q. Dingeni p 200

Q. Dingeni 300

Q. Dingeni 300

Q. Dingeni 400

Q. Dingeni 1

Q. Dingeni 2

(3)

(2)

(10)

(7)

CF
Amir Khan

Amir Khan

Amir

12

9 (24)

POLICE DEPARTMENT

DISTRICT HARIPUR.

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA, POLICE GAZETTE PART-II
ORDERED BY THE DPO HARIPUR

Dated Haripur the... 27/3/13

NOTIFICATION

No. 1546

/RETIREMENT: - SI Zumurd Khan No.231/H of this district is hereby granted 365 days encashment and retired from service with effect from 01.04.2013.

District Police Officer
? Haripur

No. 1547

Copy alongwith 6 spare copies of Notification are submitted to the Regional Police Officer, Hazara Region Abbottabad for publication in the Khyber Pakhtunkhwa Police Gazette Part-II please.

District Police Officer
? Haripur

OB NO 156
28-3-2013



ORDER

SI Zameer Khan No.23121 of this district has applied for retirement as he successfully completed 31 years and 03 Months Service. His application is accepted and granted 365 days encashment with effect from 01.04.2013.

District Police Officer
Haripur

No:1541-415 /SRC DT 27/03/13.

Copies for favour of information to the:-

- 1. Regional Police Officer, Hazara Region, Abbottabad.
- 2. District Accounts Officer, Haripur
- 3. Pay Officer, DPO Office
- 4. OHC, DPO Office
- 5. SRC/Pension Clerk, DPO Office

District Police Officer
Haripur

SB No. 1541

dt. 28.3.2013

Better Copy

26

ORDER

St. Zumrad Khan No. 231/H of this district has Applied for retirement as he successfully completed 31 years and 04 Months service, his application is accepted and granted 365 days encashment with effect from 01-04-2013.

District Police Officer

Haripur

No. 1541-45 / SRC DT: 27-03-2013

Copies for favour of information to the:-

1. Regional Police Officer, Hazara Region Abbottabad.
2. District Accounts Officer, Haripur.
3. Pay Officer, DPO Office.
4. OHC, DPO Office.
5. SRC/pension Clerk, DPO office.

District Police Officer

Haripur

OB No. 156

Dated:28-03-2013

27

STANDING ORDER NO. 02/2020

RECRUITMENT OF DECEASED CIVIL SERVANTS' WIVES AND
 EMPLOYEES

This standing order is issued u/s 17 (3) of the Khyber Pakhtunkhwa, Police Act 2017 in pursuance of the Police Policy Board decision taken in its 52nd meeting held on 21.01.2020.

1. Aim:

There was an anomaly observed in standing order No. 26/2016 and Khyber Pakhtunkhwa (APT) Rules 1989 in the recruitment of wards of employees who died during service or declared invalid Government Servant. This Standing Order is issued to correct this anomaly.

2. Legal Provision:

The Section 10 (4) of Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 also apply.

"That where a civil servant dies or is rendered incapacitated during the service then notwithstanding the procedure provided for in sub rule (2), the appointment of one of the children of such Civil Servant, or if the child is not attained the age of prescribed for appointment in Civil Service, the widow/wife of such Civil Servant, to a post in any of the Basic pay scale 1-10 now revised upto BPS 01 to 12 to facilitate the bereaved family.

Provided that the child or the widow/wife as the case may be, possess the minimum qualification prescribed for appointment to the post.

Provided further that if there are two widows/ wives of the deceased Civil Servant, preference shall be given to the elder widow/wife.

Provided also the appointment order under this sub rule is subject to availability of a vacancy and if more than one vacancies in different pay scale or available at a time, and the child or the widow, of the wife, as the

Handwritten notes and signatures on the left margin, including "OS" and "27/4".

Handwritten notes: "OSTEC/OTHC", "For m/a a.p.", and "DPO Atel 29/04/2020".

OFFICE OF DISTRICT INSPECTOR GENERAL OF POLICE
 PESHAWAR
 By No 3148
 Dato 30/4/2020
 Abbottabad

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(28)

case may be process the qualification making him or her eligible for appointment in more than one post, he/she shall ordinarily be appointed to the post carrying higher pay scale.

Provided further that this shall not apply to any post in HPS-1-10 (now up to 12) falling in the purview of the Khyber Pakhtunkhwa, Public Service Commission.

3.1 Eligibility:

The child or widow of the Government Employees who died in service or declared invalid in accordance with Section 33 of Civil Service Pension Rules 1963 by an official board or eligible for employment in the Police Department against the Post in HPS 01-12, on their own turn subject to availability of vacancy.

Explanation:-

- i. If there are more than one spouses of the deceased/invalidated employee, the senior spouse will be considered for the post.
- ii. The eldest child of the deceased/invalidated employee whether born to the first or subsequent wife will have the first right to be appointed if he fulfills the criteria.
- iii. The right cannot be divested in any other member of family but will only rest with child or widow of the deceased.
- iv. The post which falls within the ambit of Khyber Pakhtunkhwa Public Service Commission and not covered through its standing order.

3.2 Qualification for recruitment as Constable shall be as under:-

- a. Qualification: Matriculation
- b. Age: 18-25 years. (on the date of application)
- c. Minimum Height: Male: 5 Ft & 7 Inches and
Female: 5 Ft & 1 Inches
- d. Minimum Chest: Male only: 33 x 34 1/2 Inches
Female: Not applicable
- e. Physical Endurance Test
 - i. Male candidate: 1 mile (1.6 km) run in 7 minutes;
 - ii. Female candidate: 1 kilometer run in 7 minutes;

Explanation:-

i. The age of candidate shall be calculated on the date of the application submitted. Candidate once selected will undergo medical fitness test from the General Hospital.

ii. Candidate once selected will also undergo verification from local Police Station and Special Branch.

iii. Candidate who does not fulfill the above mentioned qualifications/standards shall be considered for any other post.

There shall be no requirement for advertisement of such vacancies.

The relevant provision of Standing Order No. 26/2016, Para 02 regarding 2% quota reserved for child of Police employees who died natural death during service is hereby repealed.

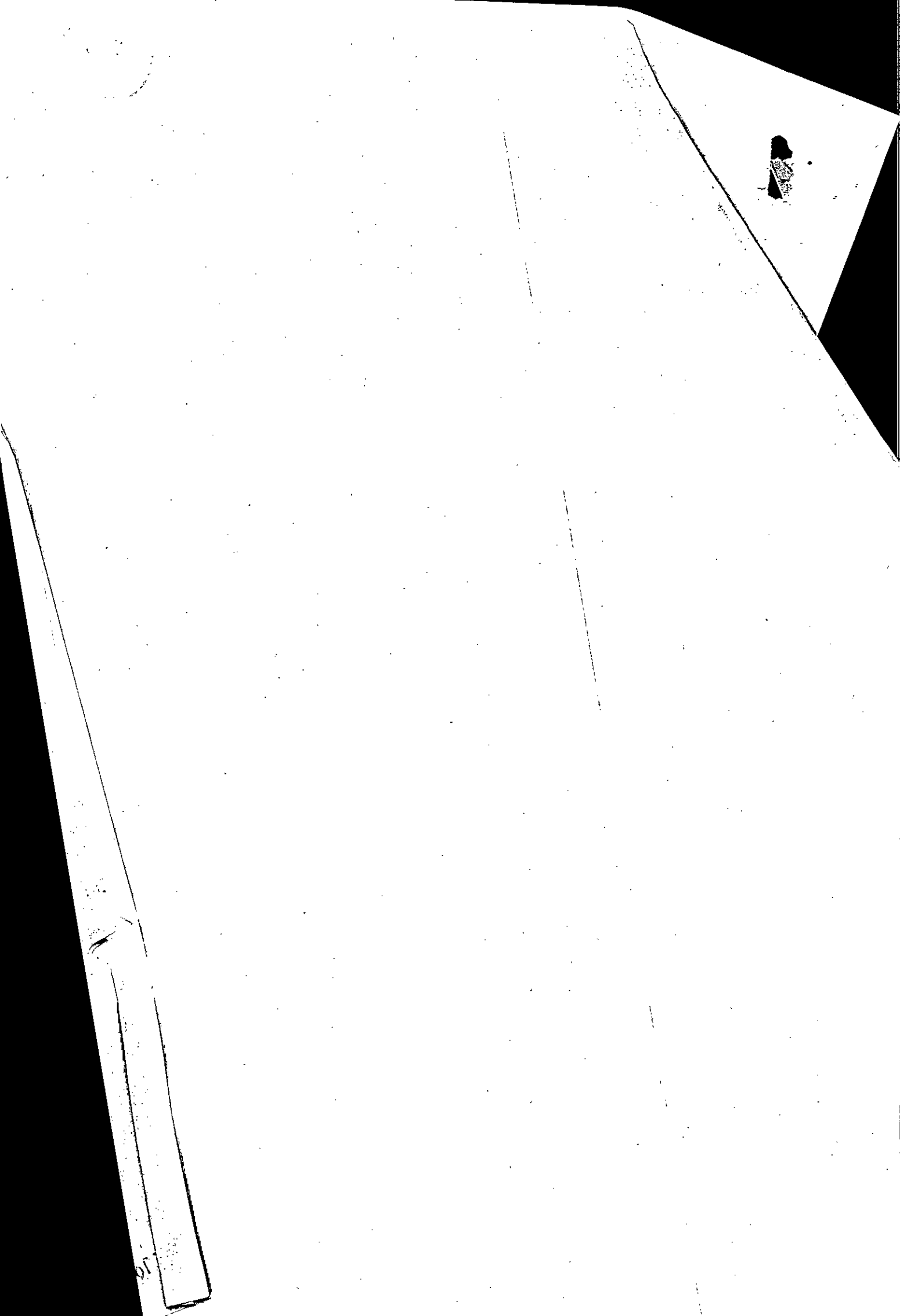
(Dr. Saadullah Abbasi) PSP
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA.

No. 02-80 /G.O. dated Peshawar the 24 April, 2020.

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

- 1. All Heads of Police offices in Khyber Pakhtunkhwa.
- 2. PRO to PPO;
- 3. Registrar CPO.

Saadullah Abbasi
DIG/Headquarters,
Khyber Pakhtunkhwa
Peshawar.



بخدمت جناب ایس۔ پی۔ صاحب انچارج کمپلیٹ سیل ضلع ہری پور

DSP HQs
Plz inquire the matter as per law & steps within 05 days
Mulla SP Complaint HR
23-09-2019

عنوان: درخواست برائے حصول انصاف و احکام صادر کئے جانے۔

جناب عالی!

چند گزارشات بذریعہ درخواست آپ کے گوش گزار کرتا ہوں جو ذیل ہیں:

۱۔ سائل حسین زمر دولد زمر دخان ریٹائرڈ سب انسپٹر کا بیٹا ہوں میرا والد SHO تھانہ شیروان تھانہ تھا کہ بدوران ڈیوٹی ان کو دل کا دورا پڑا اور انہوں نے بائی پاس آپریشن کروایا اور ٹرانسفر ہو کر آبائی ضلع ہری پور آ گئے۔ میڈیکل وجوہات کی وجہ سے مزید سروس برقرار نہ رکھ سکے اور پینشن پر علیحدہ ہو گئے۔

۲۔ سائل سال 2013 سے آج تک درخواستیں بسلسلہ بھرتی دیتا رہا اور سن کوٹہ میں بھرتی ہونے کیلئے جدوجہد کرتا رہا اور دفاتر پولیس میں اپنے حصول انصاف کیلئے چکر کاٹتا رہا لیکن انصاف نہ مل سکا اور بھرتی نہ ہو سکا۔ سائل کو پولیس ڈیپارٹمنٹ میں بھرتی ہونے کے بے حد شوق ہے اور سائل کا والد بھی 32 سال سروس کرنے کے بعد محکمہ پولیس سے پینشن پر علیحدہ ہوئے ہیں لیکن سن کوٹہ میں نہ تو سائل کو بطور کانسٹیبل بھرتی کیا گیا۔ سائل کے والد نے میڈیکل بنا پر آپریشن کروایا اور محکمہ پولیس سے علیحدگی اختیار کی جنہوں نے بدوران ملازمت نہایت دیانتداری سے ڈیوٹی سرانجام دی جن کے خلاف کوئی عوامی کمپلیٹ یا انکوائری تک نہیں ہے۔ جس کا ثبوت دفتر میں موجود ہے اور ٹیٹلیٹ و کارکردگی سے میرے والد کا سروس ریکارڈ بھرا پڑا ہے۔

۳۔ مورخہ 18-09-2019 کو میں درخواست دے کر جناب DPO صاحب پر پیش ہوا جو انہوں نے نہایت شفقت سے مجھے بیٹھا کر سنا اور درخواست لے کر بعد ملاحظہ بنارس OHC کو بلا کر اس کے حوالہ کی اور مجھے بھی ساتھ کیا اور کہا کہ اس کا مسئلہ حل کرو۔ جس نے مسئلہ حل کرنے کی بجائے مجھے نارچ کرنا شروع کر دیا کہ آپ کا والد پولیس والا ہے میرے خلاف درخواست کیوں دی ہے۔

۴۔ بنارس OHC نے باوجود گی فاروق نائب قاصد بعد االت جناب سیشن جج صاحب ہری پور کہا کہ نہ تو میں نے پہلے بھرتی ہونے دیا ہے اور نہ اب بھرتی ہونے دوں گا۔ جب میں نے اسے کہا کہ آپ کی میرے ساتھ کیا دشمنی ہے میں تو انصاف کے حصول کیلئے مارا مارا پھر رہا ہوں آپ کام نہیں کرتے تو میرے جملہ درخواست ہائے کی نقلیں اور جوٹن نے فزیکل ٹیسٹ اور NTS کے امتحان دیئے اور پاس کئے کی نقول مجھے دے دیں۔

۵۔ بنارس OHC نے مجھے کہا کہ آپ عدالت جائیں گے میرے ساتھ ہوشیاری نہ کریں آپ کو نقلیں کسی صورت نہیں دیتا۔

- 1- بنارس OHC نے مجھے کہا کہ آپ کو ہر صورت انٹرفٹ کرواؤں گا اور اپنی مرضی کے کمنٹس لکھوا کر جناب DPO صاحب کو پیش کروں گا اور آپ کی جملہ درخواستیں مسترد کرواؤں گا اور آپ کو بھرتی نہیں ہونے دوں گا۔
- 2- بنارس خان عرصہ دراز سے بطور OHC تعینات ہے جس کی وجہ سے میرا حکمہ پولیس میں بھرتی ہونا ناممکن ہے
- 3- NTS کاریکارڈ جو میں نے امتحان پاس کیا تھا جناب ڈی پی او صاحب کو پیش نہ کیا اور اسی طرح سن کوٹہ کے بارے میں بھی انہیں نہ بتلایا۔ البتہ NTS پاس کرنے کا تعلق سن کوٹہ سے نہ ہے جب کہ تعلیمی معیار اور قد چھاتی وغیرہ معیار کے مطابق ہے جو اس نے متعدد بار چیک کر کے میری درخواستیں بھی اور ادھر کر دی ہیں۔

جناب والا! آپ سے درخواست ہے کہ میری درخواست ہائے کی جملہ نقول جو میں نے بھرتی کیلئے دی تھیں کی تصدیق شدہ کاپی، فزیکل فٹنس اور میرٹ لسٹ جو تیار کی گئی تھی کی صدقہ نقول بھی فراہم کی جائیں اور انصاف کے تقاضے پورے کرتے ہوئے سائل کو حکمہ پولیس میں بطور کانشیبل یا ڈرائیور بھرتی کرنے کے احکامات صادر فرمائے جائیں۔

درخواست ہذا دو صفحات پر مشتمل ہے۔

المرقوم: 23-09-2019



CNIC NO # 13302-0434144-9 - Cell No = 0300 5059838

حسین زمر ولد زمر د خان (ریٹائرڈ سب انسپکٹر)

سکنہ پنڈ گجراں تحصیل خانپور ضلع ہری پور

کاپی برائے اطلاع:

- 1- جناب DPO صاحب ہری پور۔
- 2- جناب RPO صاحب ایٹ آباد۔
- 3- جناب PPO صاحب KPK پشاور۔
- 4- جناب چیف جسٹس صاحب عدالت عالیہ ہائی کورٹ پشاور سرکٹ بیچ ایٹ آباد۔

بخدمت جناب انسپکٹر جنرل صاحب KPK پشاور

جناب عالی!

- 1 ﴿ مودبانہ گزارش ہے کہ سائل کا والد زمر خان ریٹائر سب انسپکٹر پولیس ہے جب میرے والد SHO تھانہ شیروان ضلع ایبٹ آباد میں تعینات تھے تو ان کو دل کا دورہ پڑا جنھوں نے AFIC راولپنڈی سے بائی پاس آپریشن کروایا۔
- 2 ﴿ مجھے محکمہ پولیس میں بھرتی ہونے کا بے حد شوق تھا میں نے قبل ازیں متعدد درخواستیں دی ہیں اور NTS کا امتحان بھی دیا جس کے باوجود مجھے بھرتی نہ کیا گیا۔ میرے والد صاحب جس نے محکمہ پولیس میں 32 سال کا عرصہ گزارا اور میڈیکل وجوہات کی بنا پر اور چلنے پھرنے کے قابل نہیں ہیں۔
- 3 ﴿ جناب DPO صاحب ضلع ہری پور کو بسلسلہ بھرتی درخواست دی DPO صاحب نے مجھے سنا اور درخواست کو ملا حظہ فرمایا OHCI کو بلا کر کہا کہ اس کا مسئلہ حل کرو جس نے تاحال کوئی مسئلہ حل نہ کیا اور نقول بھی فراہم نہ کی۔
- 4 ﴿ سائل فزیکل فٹ ہے قد چھاتی برابر ہے اور تعلیم کے لحاظ سے معیار کے مطابق ہے۔
- 5 ﴿ بذریعہ درخواست ہے کہ سائل کو محکمہ پولیس میں SON کوٹہ میں بھرتی کیا جائے جو کہ میرا حق بھی ہے میں نے 2013 سے متعدد درخواستیں DPO صاحب اور افسران پولیس کو دے چکا ہوں تاحال کوئی کارروائی نہ ہوئی اور نہ ہی نقول فراہم کی گئی۔ بذریعہ درخواست استدعا ہے کہ مجھے بطور کانسٹیبل یا ڈرائیور بھرتی فرمایا جائے جمعہ کاغذات کی نقول منسلک ہیں

المرقوم 21-10-2019

العارض

حسین زمر ولد زمر خان ریٹائر سب انسپکٹر پولیس

سکنہ پنڈ گجراں، تحصیل خان پور، ضلع ہری پور

شناختی کارڈ نمبر 9-144-043413302

موبائل نمبر 0300-5059838

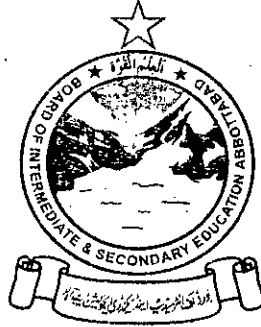
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15

Roll No. 99034

ADA No 0390660

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



**Abbottabad Khyber Pakhtunkhwa Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2010**

This is to certify that HUSNAIN ZUMURAD

Son of ZUMURAD KHAN

A candidate from GOVT. HIGH SCHOOL PIND GUJRAN HARIPUR

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in March/April, 2010 as a regular candidate. He has obtained 615 marks out of 1050 and has been placed in Grade C Representing GOOD.

The candidate passed in the following subjects:

- | | | |
|----------------|----------|------------------|
| 1. ENGLISH | 2. URDU | 3. ISL-EDUCATION |
| 4. PAK STUDIES | 5. MATHS | 6. PHYSICS |
| 7. CHEMISTRY | | 8. BIOLOGY |

Date of Birth according to admission form is TWENTY-SECOND OCTOBER

One Thousand Nine Hundred and NINETY-FOUR (22-10-1994)

[Signature]
Asstt. Secretary

[Signature]
This certificate is issued without alteration or erasure.

[Signature]
Secretary

Certificate No: AB 411032

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

Roll No: 99034

Group: SCIENCE

**SECONDARY SCHOOL CERTIFICATE EXAMINATION
DETAILED MARKS CERTIFICATE**

(CLASS X)

Session: 2010 (Annual)

Name : HUSNAIN ZUMURAD

Father's Name ZUMURAD KHAN

Date of Birth : 22-OCT-94

Institution /
District GOVT. HIGH SCHOOL PIND GUJRAN HARIPUR

has secured the marks shown against each subject in the Secondary School Certificate Examination (Class 10) held in the month of March/April as a Regular Candidate.

Subjects	Marks	Part-I		Part-II		Total	Marks in Words
		Th	Pract	Th	Pract		
English	150	36	--	50	--	86	Eighty-Six
Urdu	150	41	--	48	--	89	Eighty-Nine
Islamiat Comp	75	30	--	--	--	30	Thirty Only
Pakistan Studies	75	--	--	46	--	46	Forty-Six
Mathematics	150	36	--	65	--	101	One Hundred One
Physics	150	30	7	51	6	94	Ninety-Four
Chemistry	150	29	7	40	7	83	Eighty-Three
Biology	150	30	7	42	7	86	Eighty-Six

Total : 1050

615-C Six Hundred Fifteen Only

Dated: 15-JUN-10

Remarks :

Checked By: _____

Note:- Errors/Omissions excepted. Any mistake in the Name, Father's Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.biseatd.edu.pk

Controller of Examinations

etc
Handwritten signature

28

GOVT. HIGH SCHOOL

PIND GUJRAN HARIPUR

Character Certificate

Certified that Mr. Husnain Zamurad

S/o Mr. Zamurad Khan

Of Village: Pind Gujran Tehsal Haripur

Distt: Haripur has remained a regular

student of this school wef 01.06.08 to 10.03.10

His conduct during the stay at school was Good

Admission No: 883

Dated: 19.06.10

Head Master
Govt. High School Pind Gujran
Haripur

CTC
Nur J

18

26

GOVT. HIGH SCHOOL PIND GUJRAN (HARIPUR)

Ad-No: 883

S.S.C. EXAMINATION, 2010

PROVISIONAL CERTIFICATE

S.No 597

Registration No. 0083712017

Roll No. 99034

Certified that Mr. HUSNAIN ZUMURAD

Son of ZUMURAD KHAN who appeared from this

School in the S.S.C. (Annual) Examination held in March 20 2010

has according to the Gazette Notification supplied to this office by the Secondary Board of Intermediate and Secondary Education Abbottabad been declared successful in the said Examination.

Date of Birth in figures 22-10-1994 in words Twenty Second

Subject Passed Oct, N.H & Ninety four

- | | | | |
|------------|---------|--------------|--------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pak Study |
| 5. Maths | 6. Ph | 7. Ch | 8. Bio |

Marks Obtained 615/1050 External Grade C

Internal Grade _____ Conduct Good

Co-Curricular activities _____

Prepared By [Signature]

Checked By [Signature]

Date of Issue 19-06-2010

[Signature]
Headmaster
Govt. High School
Pind Gujran (Haripur)

CTC
[Signature]

Domestic Certificate

N.W.F.P. DISTRICT - HARIPUR.



37
4/7

I declare that I am born of parents who are/were permanently domiciled in NORTH WEST FRONTIER PROVINCE having been born/ settled in this province.

I was born at Village/ Mohallah, Pin Gujran,

Tehsil Haripur, District Haripur.

Hazara Division

Husnain Zumrad
Signature of applicant

Date 04 / 07 / 2009.

Pursuance to the Declaration date 04 / 07 / 2009.

Filled by Mr./Miss./Mrs. Husnain Zumrad, S/DA/O Zumrad Khan,

Domiciled in N.W.F.P. It is here by certified that the said Husnain Zumrad,

is born of parents who are/were/permanent resident of the North Frontier Province, having been born/settled within it.

I have satisfied myself from Personal/my Knowledge verification that the above declaration is true and certify accordingly.

This _____ Day of _____ 2009.

[Signature]
Counter Signed
District Officer
Revenue & Estate
HARIPUR.

No. 12757 Dated 04/07/09

[Handwritten initials]

Counter Signed
Deputy District Officer
Revenue & Estate
Haripur

حسین زمرود ولد زمرود خان صاحب پیدائش ۱۹۶۲ء ۲۵ مئی سکول جوا
۱۲/۱۱/۱۹۶۲ء سکول جوا میں پیدائش ہوئی۔ اس کے والد کا نام زمرود خان ہے۔ اس کے والد کا نام زمرود خان ہے۔ اس کے والد کا نام زمرود خان ہے۔

5709

حسین زمرود ولد زمرود خان صاحب پیدائش ۱۹۶۲ء ۲۵ مئی سکول جوا
۱۲/۱۱/۱۹۶۲ء سکول جوا میں پیدائش ہوئی۔ اس کے والد کا نام زمرود خان ہے۔ اس کے والد کا نام زمرود خان ہے۔ اس کے والد کا نام زمرود خان ہے۔

غیاث آباد

حسین زمرود ولد زمرود خان صاحب پیدائش ۱۹۶۲ء ۲۵ مئی سکول جوا
۱۲/۱۱/۱۹۶۲ء سکول جوا میں پیدائش ہوئی۔ اس کے والد کا نام زمرود خان ہے۔ اس کے والد کا نام زمرود خان ہے۔ اس کے والد کا نام زمرود خان ہے۔

417109

RECEIVED THE REPORTS
OF REVENUE STAFF
THE HANIPUR
HABIB TERA LUGS HANIPUR

417109

Handwritten signature or mark.

VAKALATNAMA

NO. _____/20

IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR

Zamurad Khan

Appellant
Petitioner
Plaintiff

VERSUS

Govt of KP

Respondent (s)
Defendants (s)

I/WE Zamurad Khan

do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____/20

Z. Khan

(CLIENT)

ACCEPTED

Shah

SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT

CELL NO: 0306-5109438

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

SERVICE APPEAL NO.7452/2021

Zamurd Khan r/o Pind Gujran District Haripur.

..... (Appellant)

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others.

..... (Respondents)

Reply/comments by respondents No.1, 2 & 3.

Respectfully Sheweth.

PRELIMINARY OBJECTIONS:-

1. That the instant Service Appeal is not maintainable in the present form.
2. That the appellant is estopped by his own conduct to file the instant appeal.
3. That the appellant has not come to the Honorable Tribunal with clean hands.
4. That the appellant has suppressed the material facts from the Honorable Tribunal.
5. That the instant Service Appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
6. That the instant Service Appeal is badly barred by law and limitation.
7. The appellant has no locus standi to file the instant service appeal.

REPLY ON FACTS:-


1. Pertains to personal information of appellant.
2. Correct to the extent that the appellant was recruited in police department as constable on 25.11.1981. The appellant while posted at district Haripur as incharge security guard District Courts Haripur moved an application to the competent authority for retirement from service .(Copy of application is attached as annexure "A"). Consequently, the appellant was allowed to retire from service vide notification No.1546 dated 27.03.2013. (Copy of notification is attached as annexure "B").
3. Incorrect, the appellant while serving at District Haripur opted to retire from service, and he willingly applied for retirement from service on 22.03.2013. As the appellant had served more than 31 years in police department. Therefore, he was allowed to retire from service. It is worth mentioning that the appellant was not retired on medical ground, rather it was his normal retirement as per his own willingness and option.
4. Pertains to rules, but not related to case of appellant, the appeal of the appellant did not fall in the criteria as prescribed in the Khyber Pakhtunkhwa, Civil Servants (Appointment, Posting and Transfer Rules 1989) as he was not retired from service on medical board grounds.

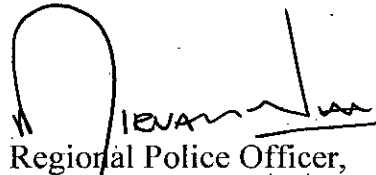
Therefore, he is not entitled for the relief as claimed by him for his son on medical board ground as prescribed under the ibid rules/standing order.

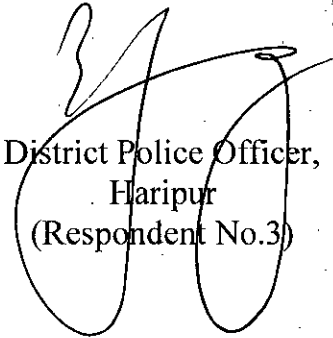
5. Incorrect, the son of the appellant does not fall on the required criteria as prescribed under the Khyber Pakhtunkhwa, Civil Servants (Appointment, Posting and Transfer Rules 1989), standing order No.26/2014 and 02/2020 issued by the competent authority. Moreover, the son of the appellant did not qualify any mandatory exam i.e. NTS/E TEA for appointment as constable in police department or clerk. Similarly, 10% quota has been reserved for the sons/daughters of police employees subject to qualifying the requisite examination NTS/E TEA as per standing order No.26/2014. (Copy of standing order No.26/2014 and standing order No.02/2020 are attached as annexure "C").
6. As stated in the preceding paras. Moreover, son of the appellant does not fall on the criteria for appointment as constable/clerk in police department as did not qualify the requisite examination i.e. NTS/E TEA as well as he is also over age. Hence, he is not entitled for the relief claimed by him.
7. Incorrect, the appellant does not fulfill the required/prescribed criteria entitling his son to be appointed as constable/clerk in police department. Therefore, the appellant has no cause of action to file the instant service appeal as well as he is not entitled for relief claimed by him under law/rules.
8. Incorrect, the son of appellant is not entitled for any appointment, as he does not fulfill the required/requisite criteria under the law/rules.

PRAYER:-

In view of above stated facts it is most humbly prayed that the instant service appeal does not hold any legal force, may kindly be dismissed with costs, please.


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar
(Respondent No.1)


Regional Police Officer,
Hazara Region,
Abbottabad
(Respondent No.2)


District Police Officer,
Haripur
(Respondent No.3)

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

SERVICE APPEAL NO.7452/2021

Zamurd Khan r/o Pind Gujran District Haripur.

..... (Appellant)

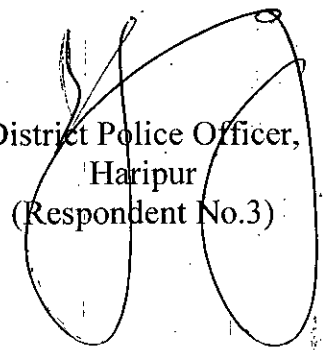
VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar, and others.

..... (Respondents)

COUNTER AFFIDAVIT

I, do hereby solemnly affirm and declare, that the contents of comments / reply, are true to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.


District Police Officer,
Haripur
(Respondent No.3)

Annex B

C

POLICE DEPARTMENT

DISTRICT HARIPUR

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERED BY THE DPO HARIPUR

Dated Haripur the 11/11/13

NOTIFICATION

No. 1546

(RETIREMENT) - SI Zameer Khan (No. 23 I/H of this district is hereby granted 365 days encashment and retired from service with effect from 01.04.2013.

District Police Officer
Haripur

OFFICE OF THE REGIONAL POLICE OFFICER, BAZARA, ABBOTABAD.

NO. 1546 /PA, dated Abbotabad, the 11/11/13.

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

- 1) Addl. I/O Investigation, PPS, Peshawar alongwith 2 spare copies of Notification for publication in PPS Gazette Part-II.
- 2) D.P.O Haripur.

Regional Police Officer,
Bazara, Abbotabad.

RC
For necessary
action
11/11/13
11/11/13
11/11/13



A 992 x C

OFFICE OF THE
THE INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

STANDING ORDER NO. 26/2014

Recruitment of Constables through NTS/E TEA and the Selection Process

This Standing Order is issued under Article 10(3) of Police Order 2002 in pursuance of the Police Policy Board decision taken in its 6th meeting held on 20th February 2014 and in continuation of Standing Order No.16/2014 on the subject of External Examinations in Police.

2. **Aim:-** More than seventy percent of Khyber Pakhtunkhwa Police manpower consists of Constables and Head Constables. Most of them get promoted and work as upper subordinates whereas in due course some of them become gazetted officers. Therefore it is critically essential to recruit the best lot as Constables in accordance with merit and in a manner that is fair, transparent and verifiable. This Standing Order aims to ensure such recruitment.

3. **Recruitment Process:-** The process for the recruitment of Constables in the Police Department shall include the following components:

- a) Advertisement of Vacancies;
- b) Physical Measurement Test;
- c) Physical Endurance Test;
- d) Written Test;
- e) Psychological Assessment or Emotional Intelligence Test;
- f) Enrollment.

3.1 There shall be no graded interview of the candidates. Instead, the candidates who qualify physical and written tests shall undergo a psychological assessment test or emotional intelligence for determining their suitability for Police service.

4. **Recruitment Exams/Tests through NTS/E TEA:-** To achieve these aims, the services of reputable testing agencies like National Testing Service (NTS) and/or Education Testing and Evaluation Agency (E TEA) will be utilized for conducting physical measurement test, physical endurance test and written test. The Central Police Office shall enter into agreement with NTS and/or E TEA and sign Memoranda of Understanding (MOUs) for utilizing their services. A specimen Memorandum of Understanding (MOU) is attached herewith as Annexure-I for guidance.

5. **Advertisement of Vacancies:-** Police Department shall advertise the available vacancies of Constables through leading national dailies and through the Internet not later than 15th February every year. The advertisement shall spell out the eligibility criteria and the terms and conditions of recruitment, including specifying the testing agency (NTS/E TEA) and test venues. Eligible candidates shall submit their applications directly to the testing agency within 15 days of the date of advertisement.

5.1 Eligibility of candidates for recruitment as constable shall be as under:-

- a) Qualification: Matriculation
- b) Age: 18-25 years
- c) District: District of Domicile
- d) Minimum Height: **Male:** 5 Ft & 7 Inches and **Female:** 5 Ft & 1 Inch
- e) Minimum Chest: **Male only:** 33 x 34 ½ Inches

5.2 Relaxation in age limit, condonation in physical measurement or quota allotted to certain categories of candidates shall apply in accordance with rules/approved policy.

5.3 Permanent address given in the CNIC of a candidate may be accepted as proof of domicile at the application stage. Production of proper domicile shall however be necessary before enrollment.

5.4 The upper age limit of a candidate shall be calculated from the 31st day of December of the preceding year.

6. **NTS/EATA Services:-** The services of NTS/EATA shall be utilized for the conduct of the following components of the recruitment process:

- a) Physical Measurement Test;
- b) Physical Endurance Test;
- c) Written Test.

7. **Physical Measurement and Physical Endurance Tests:-** Physical measurement and physical endurance tests of the eligible candidates shall be conducted through NTS/EATA in accordance with the approved criteria. NTS/EATA shall hire the services of qualified experts having experience in the relevant field for conducting the physical measurement and physical endurance tests.

7.1 **Physical Endurance Test:-** The candidates who meet the requisite physical measurement standards shall complete one-mile running as per the following details:

- a) **Male candidate:** 1 mile run in 7 minutes;
- b) **Female candidate:** 1 kilometer run in 7 minutes.

7.3 In order to ensure the selection of physically fit candidates in a transparent manner, physical measurement and physical endurance test shall be conducted in open grounds having proper facilities.

8. **Written test:-** Candidates who qualify physical measurement and physical endurance test shall undergo written test. The testing agency shall arrange sufficient and appropriate test venues in consultation with the Police Department.

8.1 The syllabus for the written test, largely based on the standard of Matriculation, shall be provided by Police Department. Written test shall be taken in the following subjects with the marks as shown against each.

- | | |
|---|-----------|
| a) English Comprehension: | 30% Marks |
| b) Urdu Comprehension: | 25% Marks |
| c) Islamiyat: | 20% Marks |
| d) General Knowledge (Including Pak Studies): | 25% Marks |

8.2 The minimum qualifying marks in the written test shall be 50 percent of the total.

8.3 **Additional Qualifications Marks:-** Additional qualifications marks, not exceeding 5 marks in any case, shall be added to the marks obtained in the written test as per the following criteria:

- | | |
|------------------------------|---------|
| a) Intermediate Certificate: | 2 Marks |
| b) Bachelor Degree: | 2 Marks |
| c) Master Degree or above: | 1 Mark |

8.4 **Additional Marks for Special Police Officers:-** Any candidate who has completed three years satisfactory service as a Special Police Officer (SPO), so certified by the concerned Head of District Police, shall be entitled for additional three marks to be added to his marks in the written test and additional qualifications marks, if any.

8.5 **Merit Lists:-** NTS/E TEA shall prepare District-wise as well as category-wise (Police sons, females, minorities, etc.) merit lists and announce the results of the entire selection process within 48 hours of the written test.

8.6 NTS/E TEA shall furnish to the Police Department all records of the entire selection process.

8.7 **Validity of Merit Lists:-** Merit lists shall be valid till 31st day of December of the year of recruitment.

8.8 Merit list and waiting lists, if any, shall be displayed on notice boards in the concerned Police Lines and in the offices of the District Heads of Police. The same shall also be placed on the Internet through the websites of the testing agency and the Police Department.

9 **Psychological Assessment or Emotional Intelligence Test:-** The candidates who qualify written test shall undergo a psychological assessment or emotional intelligence test. Panels of experts, preferably constituted at the District level, to be so notified by the Inspector General of Police will conduct the psychological assessment test. Each panel shall consist of at least three persons including the Deputy Inspector General of Police of the Region as its Chairman, the District Police Officer concerned (SSP Operations in case of Peshawar) and one recognized and reputable psychologist/ expert.

9.1 The psychological assessment or emotional intelligence test shall be conducted for assessing the suitability of candidates for Police service. Candidates who are assessed as mentally unstable or having criminal/extremist tendencies shall be recommended for disqualification.

9.2 Authentication of Physical Measurement:- The physical measurement of candidates appearing in the psychological assessment test shall also be re-checked and verified by the Panel mentioned in Section 9. Candidates found deficient in physical measurement shall be recommended for disqualification. Such cases shall be referred to the Physical Measurement Review Board mentioned in Section 12 below.

10. Psychological Assessment Review Board:- Cases of the candidates who are recommended for disqualification on the basis of the psychological assessment test shall be referred for final assessment to the Psychological Assessment Review Board at the CPO.

11. The Psychological Assessment Review Board shall consist of such members as may be determined by the Inspector General of Police, and may preferably include two to three psychologists/experts having service experience in the ISSB.

11.1 Those candidates who are declared unsuitable for Police service by the Psychological Assessment Review Board shall stand disqualified for recruitment. The decision of the Board shall be final.

12. Physical Measurement Review Board:- Cases of candidates who are recommended for disqualification by the Panel mentioned to Section 9 above on the basis of deficient physical measurements, shall be referred to the Physical Measurement Review Board at the CPO for review. Except in cases of visible variation in the chest measurement found by the panel, which shall be reviewed by the Board, the measurements carried out by the testing agency shall stand valid.

12.1 In case of difference of opinion between the Panel and the Review Board regarding the chest measurement of a candidate, the decision of the Review Board shall stand final, subject to the general guidelines issued by the Inspector General of Police.

12.2 The Physical Assessment Review Board shall consist of such members as may be determined by the Inspector General of Police and may include senior Police officers as well as serving or retired army officers, having experience in the relevant field, as coopted members.

13. Enrollment:- The concerned Head of District Police shall enroll, strictly in accordance with the order of merit of NTS/ETEA written test, those candidates against the available vacancies who have qualified all stages of recruitment, subject to security clearance through Special Branch and medical examination.

13.1 Successful candidates shall be enrolled in their Districts of Domicile only.

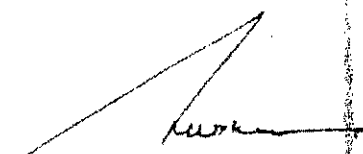
13.2 Those successful candidates who are left out of enrollment due to filling of available vacancies shall be placed on waiting lists till the 31st day of December of the year of recruitment and shall be enrolled in accordance with the order of merit as and when vacancies occur in the respective Districts subsequently.

13.3 The merit lists or waiting lists, if any, shall not be valid for the next year.

13.4 Ten percent quota shall be reserved for the Police employees' sons/daughters who fulfill all the requirements as set for the general candidates. Females and minorities will also be given due share as per the government policy. ✓

14. **Power to remove difficulties:-** If any difficulty arises in giving effect to this order, the Provincial Police Officer may by notification make such provisions as deemed appropriate. ✓

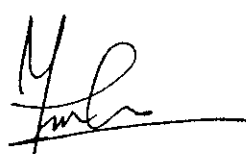
15. **Amendment:-** All previous Standing Orders on the subject, to the extent of the provisions of this order, shall stand amended.


(NASIR KHAN DURRANI)
Provincial Police Officer
Khyber Pakhtunkhwa
Peshawar

No:- 1819-1889/GB dated Peshawar the 28th November 2014

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

1. All Heads of Police Offices in Khyber Pakhtunkhwa;
2. PRO to PPO;
3. Registrar CPO


(MUBARAK ZEB) PSP
DIG Headquarters
Khyber Pakhtunkhwa
Peshawar

STANDING ORDER NO. 02/2020.
RECRUITMENT OF DECEASED SONS/ INVALIDED GOVERNMENT
EMPLOYEES.

This standing order is issued u/s 17 (3) of the Khyber Pakhtunkhwa, Police Act 2017 in pursuance of the Police Policy Board decision taken in its 52nd meeting held on 21.04.2020.

1. Aim:

There was an anomaly observed in standing order No. 26/2016 and Khyber Pakhtunkhwa (AP) Rules 1989 in the recruitment of wards of employees who died during service or declared invalid Government Servant. This Standing Order is issued to correct this anomaly.

2. Legal Provision:

The Section 10 (4) of Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 also amplify:

"That where a civil servant dies or is rendered incapacitated/ invalidated permanently during the service then notwithstanding the procedure provided for in sub rule (2), the appointing authority may appoint one of the children of such Civil Servant, or if the child is not attained the age of prescribed for appointment in Civil Service, the widow/ wife of such Civil Servant, to a post in any of the Basic pay scale 1-10 now revised upto BPS 01 to 12 to facilitate the bereaved family.

Provided that the child or the widow/ wife as the case may be, possess the minimum qualification prescribed for appointment to the post.

Provided further that if there are two widows/ wives of the deceased Civil Servant, preference shall be given to the elder widow/ wife.

Provided also the appointment order under this sub rule is subject to availability of a vacancy and if more than one vacancies in different pay scale or available at a time, and the child or the widow, of the wife, as the

case may be process the qualification making him or her eligible for appointment in more than one post, he/she shall not be appointed to the post carrying higher pay scale.

Provided further that this shall not apply to any post in BPS-1-10 (now up to 12) falling in the purview of the Khyber Pakhtunkhwa, Public Service Commission".

3.1 Eligibility:

The child or widow of the Government Employees who died in service or declared invalid in accordance with Section 3.3 of Civil Service Pension Rules 1963 by an official board or eligible for employment in the Police Department against the Post in BPS 01-12, on their own turn subject to availability of vacancy.

Explanation:-

- i. If there are more than one spouses of the deceased/invalidated employee, the senior spouse will be considered for the post.
- ii. The eldest child of the deceased/invalidated employee whether born to the first or subsequent wife will have the first right to be appointed if he fulfills the criteria.
- iii. The right cannot be divested in any other member of family but will only rest with child or widow of the deceased.
- iv. The post which falls within the ambit of Khyber Pakhtunkhwa Public Service Commission are not covered through this standing order.

3.2 Qualification for recruitment as Constable shall be as under:-

- a. Qualification Matriculation.
- b. Age 18-25 years. (on the date of application)
- c. Minimum Height: Male: 5 ft & 7 inches and
Female: 5 ft & 1 inches.
- d. Minimum Chest: Male only: 33 x 34 ¹/₂ inches
Female: Not applicable.
- e. Physical Endurance Test
 - i. Male candidate: 1 mile (1.6 km) run in 7 minutes
 - ii. Female candidate: 1 kilometer run in 7 minutes

Explanation:-

The age of the candidate shall be calculated on the date of the application submitted.

- ii. The candidate once selected will undergo medical fitness test from Government Hospital.
- iii. The candidate once selected will also undergo verification from local Police and Special Branch.
- iv. The candidate who does not fulfill the above mentioned qualifications/standards shall be considered for any other post.
- v. There shall be no requirement for advertisement of such vacancies.

4. Repeal:

The relevant provision of Standing Order No. 26/ 2016, Para 02 regarding 2% quota reserved for child of Police Employees who died natural death during service is hereby repealed.

-sd/-

(Dr. Saqullah Ahbasi) PSP
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA,

No.


01-80

(GIB) dated Peshawar the

24 April, 2020.

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

1. All Heads of Police offices in Khyber Pakhtunkhwa.
2. PRO to PPO;
3. Registrar CPO.


(SALMAN CHOUDHRY) PSP
DIG/Headquarters
Khyber Pakhtunkhwa
Peshawar.

“B”

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

No.

Appeal No. 7452 of 2021

Zamir Uddin Khan Appellant/Petitioner

Versus

IAP Pesh Respondent

Respondent No. 3

Notice to:

District Police officer Hari Pur

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 18-01-2022 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 13

Day of 01 2022

18-01-2022

instead of

14-1-2022




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.

18-1-5053
District Police Officer
18-1-5053
18-1-5053
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18-1-5053

Peshawar
Khatkhwa Service Tribunal

18-1-5053 and Gateded Holidays

"B"

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

No.

Appeal No. 7452 of 20 21

Zamrud Khan Appellant/Petitioner

Versus

IGP Pesh Respondent

Respondent No. 2

Notice to:

Regional Police Officer (DIG)
Hazara 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 18-1-2022 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 13

Day of 1-20-22

18-1-2022
instead of
14-4-2022.



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.

18-1-2025
Regional Police Office (D) (A)
18-1-2025
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