

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 71/2023

Khalid Mehmood S/O Muhammad Ayub (Patwari District Haripur)
R/O Village Chamba Pind, Tehsil & District Haripur.
.....(Petitioner)

VERSUS

1. Senior Member Board of Revenue Govt of KPK Peshawar.
2. Commissioner, Hazara Division Abbottabad.
3. Deputy Commissioner, Haripur.(Respondents)


EXECUTION PETITION IN SERVICE APPEAL NO. 1702/2019

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PETITIONER

THROUGH


(MUHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
AT PESHAWAR

Dated: 15-02-2023

①

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Execution Petition No...77/2023

Khalid Mehmood S/O Muhammad Ayub (Patwari District Haripur)
R/O Village Chamba Pind, Tehsil & District Haripur.

.....(Petitioner)

VERSUS

1. Senior Member Board of Revenue Govt of KPK Peshawar.
2. Commissioner, Hazara Division Abbottabad.
3. Deputy Commissioner, Haripur,(Respondents)

EXECUTION PETITION IN SERVICE APPEAL NO. 1702/2019 FOR
PROVISIONAL AND CONDITIONAL IMPLEMENTATION OF
JUDGMENT/DECISION DATED 18-05-2022 OF THIS HONOURABLE
SERVICE TRIBUNAL.

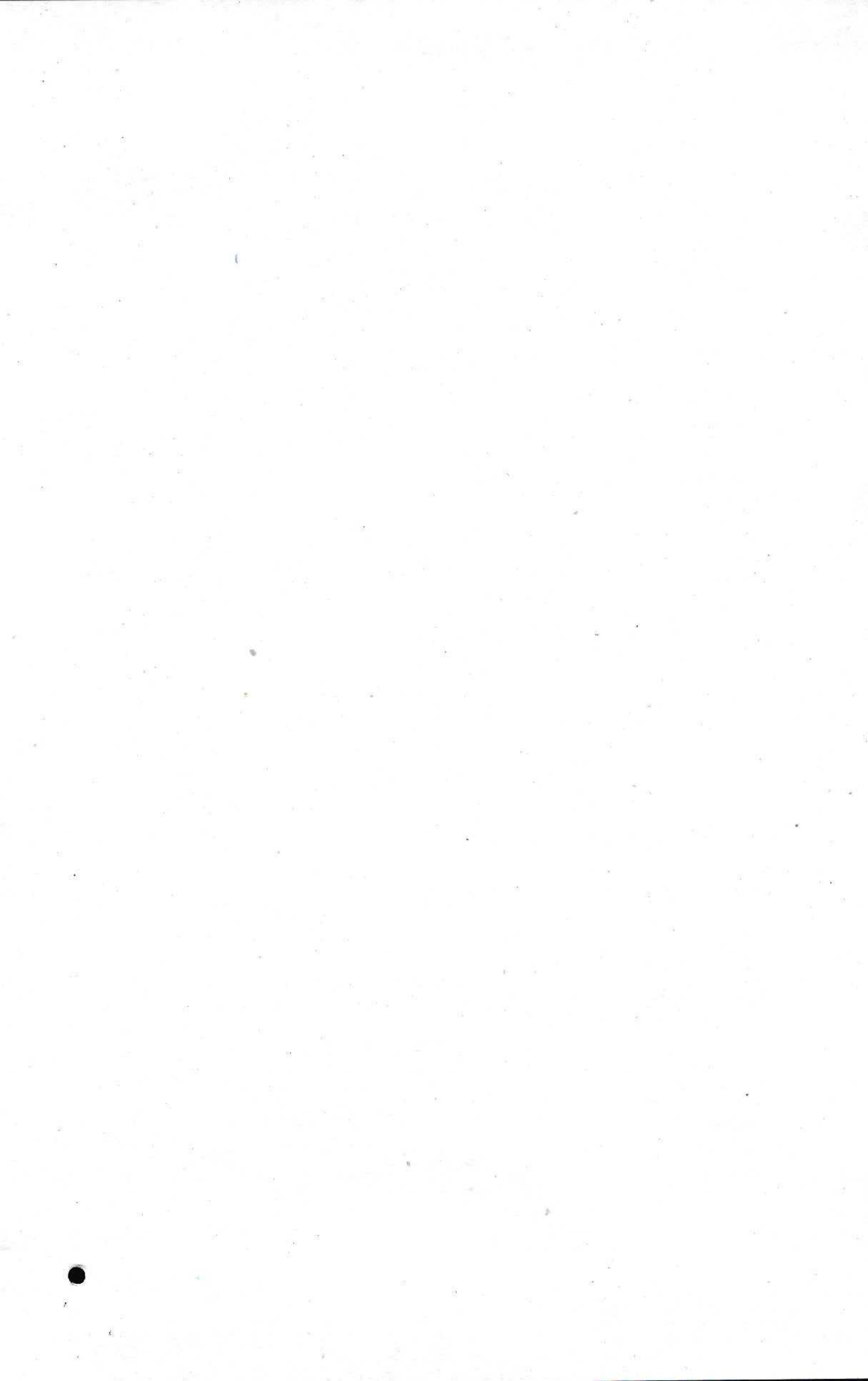
PRAYER: ON ACCEPTANCE OF INSTANT EXECUTION PETITION THE
RECONDENTS MAY GRACIOUSLY BE DIRECTED TO IMPLEMENT THE
JUDGMENT/DECISION DATED 18-05-2022 OF THIS HONOURABLE
SERVICE TRIBUNAL PROVISIONALLY/CONDITIONALLY SUBJECT TO
OUTCOME OF CPLA BEING FILED BY THE RESPONDENTS.

Respectfully Sheweth:

1. That petitioner/appellant filed subject titled service appeal before this Honorable Service Tribunal against the orders of Respondents whereby petitioner/appellant was dismissed from service and his departmental appeal was rejected in flagrant violation and negation of law, departmental rules and regulations and denied the appellant's reinstatement in service. **(Copy of the service appeal is attached as Annex "A")**



2. That this Honorable Tribunal on acceptance subject service appeal issued judgment/decision dated 18-05-2022 that "we hold that the allegations were not substantiated by any documentary proof as no such document was produced before the Tribunal to justify the impugned order. The upshot of the above discussion is that we allow this appeal and set aside the impugned orders original as well as appellate and as a resultant consequence, we direct reinstatement of the appellant in the service with all consequential back benefits". **(Copy of judgment/decision dated 18-05-2022 is attached as Annexure-"B")**.
3. That on receipt of attested copy of the judgment/decision dated 18-05-2022 of this Honorable Tribunal, the appellant reported for duty on 30-05-2022 **(Copy of duty report is attached as Annexure "C")**.
4. That despite petitioner's incessant approaches to respondents he has not been allowed to join his duties. Petitioner is jobless since his dismissal from service. Petitioner alongwith his family is facing financial distresses due to his unemployment.
5. That the respondents instead of taking petitioner on duty issued an un-dated and unsigned Notice that Respondents were filing CPLA with stay application against the judgment/decision of Honorable KPK Service Tribunal dated 18-05-2022 before the Supreme Court of Pakistan in its Branch Registry at Peshawar. **(Copy of the Notice is attached as Annexure-"D")**.



6. That there is no stay order from the Apex Supreme Court of Pakistan against the judgment/decision dated 18-05-2022 of this Honorable Tribunal is in field and in such a position respondents are legally bound to implement the said judgment/decision in its letter and spirit. Hence this Execution Petition on the following:

GROUNDS

- A) That as this Honorable Service Tribunal in its judgment/decision dated 18-05-2022 has decided that "we hold that the allegations were not substantiated by any documentary proof as no such document was produced before the Tribunal to justify the impugned order. The upshot of the above discussion is that we allow this appeal and set aside the impugned orders original as well as appellate and as a resultant consequence, we direct reinstatement of the appellant in the service with all consequential back benefits".
- B) That there is no stay order from the Apex Supreme Court of Pakistan against the Judgment/decision dated 18-05-2022 of this Honorable Tribunal and the same is in field. Respondents are legally bound to comply with the said judgment/decision.
- C) That departmental authorities/respondents are reluctant to pay any heed to the judgment/decision dated 18-05-2022 of this Honorable Tribunal hence instant execution petition.



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- D) That petitioner is facing financial distresses due to non-implementation of judgment/ decision of this Honorable Tribunal.
- E) That instant Execution Petition is well within time and this Honorable Tribunal has got ever jurisdiction to entertain and adjudicate upon the same.

PRAYER:

It is, therefore, humbly prayed that this Honorable Tribunal may graciously be pleased to accept this Execution Petition and issue necessary orders/directions to the respondents to implement the judgment/decision dated 18-05-2022 of this Honorable Tribunal in its true letter and spirit.

THROUGH


PETITIONER

M. Aslam
(MUHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
AT PESHAWAR

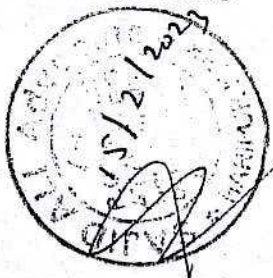
Dated: 15-02-2023

AFFIDAVIT

I, Khalid Mehmood petitioner do hereby undertake/solemnly affirm that the contents of foregoing petition are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honorable Tribunal.

Dated 15-02-2023


DEPONENT





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Annex A

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Appeal No... 1702/2019

Diary No. 1776

Dated 06/12/2019

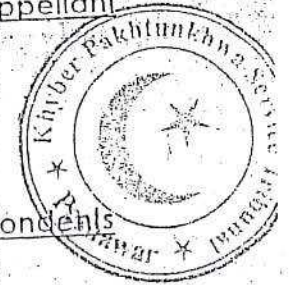
Khalid Mehmood S/O Mohammad Ayub (Ex-Palwari, Ghazi Haripur)
R/O Chamba Pind, Tehsil & District Haripur.

Appellant

VERSUS

1. Senior Member Board of Revenue, Govt of KPK, Peshawar.
2. Commissioner, Hazara Division, Abbottabad.
3. Deputy Commissioner, Haripur.

Respondents



SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE
TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 26-03-2019
OF THE DEPUTY COMMISSIONER, HARIPUR WHEREBY THE
APPELLANT HAS BEEN DISMISSED FROM SERVICE AND THE
COMMISSIONER HAZARA DIVISION ABBOTTABAD ORDER
DATED 28-11-2019 WHEREBY HIS DEPARTMENTAL APPEAL HAS
BEEN DISMISSED.

PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL
BOTH THE IMPUGNED ORDERS DATED 26-03-2019 AND 28-11-
2019 OF THE RESPONDENTS NO. 2&3 MAY GRACIOUSLY BE
SET ASIDE AND THE APPELLANT BE RE-INSTATED IN SERVICE
FROM THE DATE OF DISMISSAL WITH ALL CONSEQUENTIAL
SERVICE BACK BENEFITS.

Respectfully sheweth,

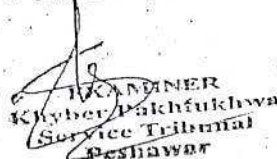
1. That the appellant was appointed as Palwari in the respondents department on -1996 thus has rendered about 23 years service.
2. That while appellant posted as Palwari Halqa Ashrah, Union Council Bail Gali, Tehsil Ghazi, District Haripur was suspended from service vide order dated 21-01-2019. (Copy of suspension order dated 21-01-2019 is attached annex-"A")

Filed to-day



6/12/19


ATTESTED


ATTORNEY
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



- (6)
3. That the appellant was issued a Charge Sheet by the Deputy Commissioner Haripur on 29-01-2019 with the following allegations:
- (i) That you prepared fake, bogus and fabricated voucher of compensation of acquired land amounting to Rs.8,575,890/- in favour of Mr. Kamran Nazakat s/o Nazakat Hussain under the fake signature of Deputy Commissioner, Haripur.
- (ii) That you committed forgery to transfer Govt money into your personal Account No.000255091691 United Bank Ltd Sarai Gadai Branch Haripur titled as "Khalid Mehmood".
(Copy of Charge Sheet is Annexed- "B").
4. That the aforementioned Charge Sheet was duly replied on 04-02-2019 explaining all facts in detail by denying the allegations as false, fabricated and baseless against the appellant.
(Copy of reply dated 04-02-2019 to the Charge Sheet is attached as Annexure- "C").
5. That thereafter the appellant was served upon with a Show Cause Notice dated 28-02-2019 alongwith inquiry report delivered on 15-03-2019 with the allegations as before.
(Copies of inquiry report and Show Cause Notice dated 28-02-2019 are attached as Annexure-"D & E").
6. That the above mentioned Show Cause Notice was replied on 16-03-2019 explaining all facts and the allegations were denied.
(Copy of reply dated 16-03-2019 to the Show Cause Notice is attached as "F").
7. That without taking into consideration reply submitted to the Charge Sheet & Show Cause Notice, the Deputy Commissioner Haripur vide Order dated 26-03-2019 imposed major penalty of "Dismissal from Service" upon appellant without any proof and reason. Opportunity of personal hearing was also not provided.
(Copy of order dated 26-03-2019 is attached as Annexure-"G").

ATTESTED

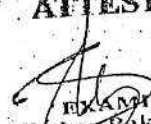

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



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3. That so far as the allegation of preparation of Compensation Voucher is concerned; no such voucher was ever prepared by appellant. Appellant has no concern with any "Kamran Nazakat s/o Nazakat Hussain". Even otherwise the charge was ambiguous as no specification pertaining to voucher number, date, land etc was mentioned in the Charge Sheet, Show Cause Notice as well as in the Impugned Order. The charge was false; fabricated and baseless rather mere allegation based on misleading information communicated to worthy officer by persons having enmity and personal grudge towards appellant. Hence allegations had been vehemently denied being false, fabricated and baseless.
9. That the allegation of transfer of government money into personal account at United Bank Ltd Sara-e-Gadai Branch is also false and baseless. Alleged account was opened for GPF Advance which appellant had applied on 15-01-2019 as amount required for education of his children and UBL Serai Gadai Branch was nearer to his home. GPF Advance had been sanctioned but since not released to which effect an application had also been submitted by appellant. (Copies of Bank statement, Application for GPF Advance, GPF Balance Sheet and application for release of GPF Advance are attached as "H, I, J & K").
10. That it is not understood as to how a person without going through the prescribed process of payment of acquired land can transfer government money to his account and that too by only preparing a fake voucher through a third person. The person trying in such a way may be a non-sense one. The and manner of fraud for pocketing government money as has been alleged is a very strange and ridiculous one and is beyond approach of a prudent mind, however, the appellant has been penalized and dismissed from service without any reason and proof.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar




- (4) (7)
11. That no proper departmental inquiry was conducted against the appellant. Neither was he provided the opportunity to cross examine the witness, if any. Even opportunity of personal hearing was provided to him. He was condemned unheard.
 12. That the inquiry findings recorded by Enquiry Officer are based on surmises, conjectures and speculations without any reason and proof and nothing adverse could be brought on record against the appellant. Inquiry Officer has leveled unnecessary allegations against appellant which are denied being baseless and false. The appellant is jobless since his dismissal from service and has no source of income. Appellant was also not paid his monthly salary during suspension.
 13. That against order dated 26-03-2019 of the Deputy Commissioner Haripur, the appellant preferred a departmental appeal dated 28-03-2019 before the Commissioner, Hazara Division, Abbottabad wherein he agitated all the facts and circumstances of the matter by denying the allegations leveled against him. (Copy of the departmental appeal dated 21-01-2019 is attached as annex-"L").
 14. That the Commissioner, Hazara Division, Abbottabad without giving any heed to the appellant's departmental appeal and providing opportunity of personal hearing dismissed the same vide his order dated 28-11-2019. (Copies of the order dated 20-11-2019 and 28-11-2019 are attached as annexure-"M & N").
 15. Hence instant service appeal, inter alia, on the following amongst others:-

GROUNDS:


- a) That both the impugned orders dated 26-03-2019 and 28-11-2019 of respondents are illegal, unlawful against the facts and circumstances of the matter hence are liable to be set aside.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



- b) That no proper departmental inquiry was conducted. The so-called Inquiry Officer acted in a flimsy and whimsical manner. He conducted inquiry in utter violation and negation of the procedure set forth by the law for the dispensation of justice at the preliminary stages during the course of departmental inquiries, hence penalty awarded on the basis of such inquiry through orders impugned herein is liable to be set aside.
- c) That neither a single witness was produced in presence of appellant before the so-called Inquiry Officer nor was appellant provided a chance to cross examine such witness, if any. That the appellant was never confronted with documentary evidence, if any, produced against him.
- d) That the respondents have not treated the appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders, which are unjust, unfair hence not sustainable in the eyes of law.
- e) That the appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken in the memo of appeal. Thus the impugned order of respondent is contrary to the law as laid down in the KPK Govt Servants (E&D) Rules 2011, other departmental rules regulations read with section 24-A of General Clause Act 1897 read with Article 10A of the Constitution of Islamic Republic of Pakistan 1973.
- f) That appellant was also not provided opportunity of personal hearing before awarding penalty which was mandatory under law thus, he has been condemned unheard.
- g) That instant appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudication upon the same.


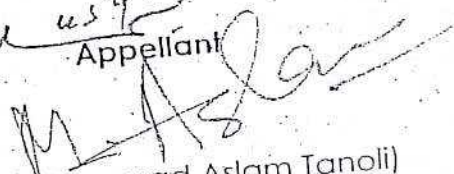
ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



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PRAYER:

It is, therefore, humbly prayed that on acceptance of instant Service Appeal both the orders dated 26-03-2019 and 28-11-2019 of respondents No.2 & 3 may graciously be set aside and appellant be re-instated in his service with all consequential service back benefits. Any other relief which this Honourable Tribunal may deem fit in circumstances of the instant case may also be granted.

Through: 
Appellant

(Mohammad Aslam Tanoli)
Advocate High Court
At Haripur

Dated 6-12-2019


VERIFICATION

It is verified that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.

Dated 6-12-2019


Appellant

Certified to be true copy


INER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 24/5/22
 Number of Words 2400
 Copying Fee 26
 Urgent 4
 Total 30
 Name of Copies _____
 Date of Completion of Copy 24/5/22
 Date of Delivery of Copy 24/5/22



(10) *Annex 5*

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No... 1702/2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1776

Dated 06/12/2019

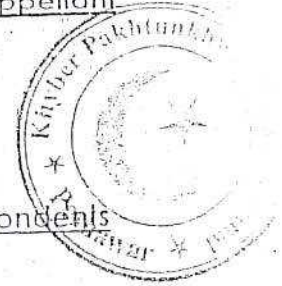
Khalid Mehmood S/O Mohammad Ayub (Ex-Patwari, Ghazi Haripur)
R/O Chamba Pind, Tehsil & District Haripur.

Appellant

VERSUS

1. Senior Member Board of Revenue, Govt of KPK, Peshawar.
2. Commissioner, Hazara Division, Abbottabad.
3. Deputy Commissioner, Haripur.

Respondents



SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 26-03-2019 OF THE DEPUTY COMMISSIONER, HARIPUR WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AND THE COMMISSIONER HAZARA DIVISION ABBOTTABAD ORDER DATED 28-11-2019 WHEREBY HIS DEPARTMENTAL APPEAL HAS BEEN DISMISSED.

PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH THE IMPUGNED ORDERS DATED 26-03-2019 AND 28-11-2019 OF THE RESPONDENTS NO. 2&3 MAY GRACIOUSLY BE SET ASIDE AND THE APPELLANT BE RE-INSTATED IN SERVICE FROM THE DATE OF DISMISSAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respectfully sheweth,

1. That the appellant was appointed as Patwari in the respondents department on _____-1996 thus has rendered about 23 years service.
2. That while appellant posted as Patwari Halqa Ashrah, Union Council Bait Gali, Tehsil Ghazi, District Haripur was suspended from service vide order dated 21-01-2019. (Copy of suspension order dated 21-01-2019 is attached annex-"A")

Filed to-day

[Signature]

6/12/19

ATTESTED

[Signature]
KAMMNER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



(11)



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP COURT ABBOTTABAD.

Service Appeal No. 1702/2019 -

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

Khalid Mehmood S/O Mohammad Ayub (Ex-Patwari, Ghazi haripu), R/O Chamba Pind, tehsil & District haripur.
..... (Appellant)

VERSUS

1. Senior Member Board of Revenue, Govt. of Khyber Pakhtunkhwa Peshawar.
 2. Commissioner, Hazara Division, Abbottabad.
 3. Deputy Commissioner, Haripur.
- (Respondents)

Present:

MOHAMMAD ASLAM KHAN TANOLI,
Advocate --- For Appellant.


MUHAMAMD RIAZ KHAN PAINDAKHEL,
Assistant Advocate General --- For respondents.

Date of Institution.....06.12.2019
Date of Hearing.....17.05.2022
Date of Decision.....18.05.2022

JUDGEMENT

KALIM ARSHAD KHAN, CHAIRMAN:- The service appeal has been instituted under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 26.03.2019 of the Deputy Commissioner Haripur whereby the appellant has been dismissed from service and the Commissioner Hazara Division Abbottabad order dated 28.11.2019 whereby his departmental appeal has been dismissed.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

02. Brief facts of the case are that the appellant was appointed as Patwari in the respondent-department; that the appellant while posted as Patwari halqa Ashrah, union Council Bait Gali, district Haripur was



suspended from service vide order dated 21.01.2019. Thereafter the appellant was issued a charge sheet by Deputy Commissioner Haripur on 29.01.2019. The said charge sheet was duly replied with by the appellant on 04.02.2019 and denied all the allegations leveled against him. Thereafter a show cause notice was served upon the appellant on 28.02.2019 alongwith inquiry report delivered on 15.03.2019 which was also replied by the appellant on 16.03.2019; that vide impugned order dated 26.03.2019 imposed major penalty of dismissal from service on the appellant. Feeling aggrieved of the impugned order, the appellant preferred departmental appeal on 28.03.2019 which was dismissed on 28.11.2019, thereafter the instant service appeal has been filed in this Tribunal on 06.12.2019.

03. Notices were issued to the parties who submitted written replies/comments on contents of the appeal. We have heard learned counsel for the appellant and Assistant Advocate General and perused the case file with connected documents thoroughly.

04. There were two allegations against the appellant in the charge sheet one that you prepared fake, bogus and fabricated voucher of compensation of the acquired land amounting to Rs. 8,575,890/- in favour of Mr. Kamran Nazakat S/o Nazakat Hussain under the fake signature of Deputy Commissioner, Haripur and second he committed forgery to transfer Government money into your personal account No. 000255091691 United bank Ltd Sarai Gadai Branch haripur titled as "Khalid Mehmood". After departmental proceedings and enquiry, the appellant was dismissed from service by Deputy Commission, Haripur

ATTESTED

12/12/2019
15/12/19

[Signature]

12/12/2019

vide order No. 3708-14-1(1)HCR/DC(H) dated 26.03.2019 against



(3)

which he filed departmental appeal which was turned down by the Commissioner, Hazara Division vide order bearing No. Appeal/HVC/ACR/CHD/3588-90 dated Abbottabad 28.11.2019.

05. We have perused the enquiry report annexed with the reply. According to the findings of the enquiry officer, the appellant was found guilty of preparing fake, bogus and fabricated voucher of compensation of the acquired land amounting to Rs. 8575890/- in favour of Mr. Kamran Nazakat S/O Nazakat Hussain under the fictitious signature of the Deputy Commissioner, Haripur with the contention to transfer the said money in his personal account No. 000255091691, United Bank Limited, Serai Gadai Branch, Haripur which was specifically opened for this purpose. Regarding the above allegations and it was recommended that any of the penalty provided under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 might be imposed on the appellant.

06. After hearing the learned counsel for the appellant, when we confronted the learned Assistant Advocate General representing the respondents to show the Tribunal even a copy of a voucher which has been alleged to be fake and forged and fabricated bearing signature of the Deputy Commissioner, Haripur but the learned AAG as well as respondents could neither place any such voucher on the file or till the conclusion of the arguments such voucher could be produced what to talk of its fakeness and fabrication or putting fictitious signature of the Deputy Commissioner by the appellant. The respondents have not annexed any document to show that any government money was transferred to any personal account of the appellant. The respondents

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



have annexed with the reply a photocopy of account statement of account No. 000255091691, United Bank Limited, Serai Gadai Branch, Haripur in the name of one Khalid Mehmood which shows that the opening and closing balance was zero.

07. Therefore, we hold that the allegations were not substantiated by any documentary proof as no such document was produced before the Tribunal to justify the impugned order. The upshot of the above discussion is that we allow this appeal and set aside the impugned orders original as well as appellate and as a resultant consequence, we direct reinstatement of the appellant in the service with all consequential back benefits. Costs shall follow the event. Consign.

08. Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal this 18th day of May, 2022.



(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD

(FAREEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

Date of Presentation of Application 24-5-22

Number of Words 1600

Copying fee 18/-

Urgent 4/2

Total 22/-

Name of Copyist _____

Date of Completion of Copy 24-5-22

Date of Delivery of Copy 24-5-22

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



(15)

Ammed - 20

To

The Deputy Commissioner,
Haripur.

Subject:- DUTY REPORT.

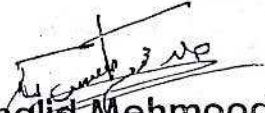
Sir,

With respect it is submitted:-

1. That I was dismissed from service vide the then Deputy Commissioner Haripur order dated 26-03-2019 and my departmental appeal was also rejected vide Commissioner Abbottabad order 28-11-2019.
2. That against the aforementioned departmental orders I preferred a Service Appeal before the honorable KPK Service Tribunal Peshawar which was accepted vide judgment/decision dated 18-05-2022 and the appellant has been re-instated in service with back benefits. **(Copy of the decision dated 18-05-2022 is attached herewith).**
3. That as per judgment/decision dated 18-05-2022, I have become entitled to be taken on duty. I therefore report for duty in the light of said judgment/decision of the honorable KPK Service Tribunal Peshawar.

It is, therefore, requested that I may very kindly be allowed to join my duties in pursuance of KPK Service Tribunal Peshawar judgment/decision dated 18-05-2022 and obliged.

Yours Obediently


(Khalid Mehmood)
Patwari Halqa Ashrah
Haripur.

Dated : 30-05-2022





(16)

Annex-1

IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

CPLA NO. _____/2022

Senior Member Board of Revenue, Government
of Khyber Pakhtunkhwa, Peshawar & others -----PETITIONERS

VERSUS

Khalid Mehmood -----RESPONDENT

NOTICE

To



Khalid Mehmood S/o Mohammad Ayub (Ex-Patwari, Ghazi
Haripur) R/o Chamba Pind, Tehsil & District Haripur

II

Please take notice Registered A/D post to the effect that I am filing
CPLA with stay application in the above titled case against the judgment of
the Hon'ble Khyber Pakhtunkhwa Service Tribunal, Camp Court,
Abbottabad dated 18/05/2022 in Service Appeal No.1702/2019 before the
Supreme Court of Pakistan in its Branch Registry at Peshawar.

(Farid Ullah Kundi)
Advocate-on-Record
Supreme Court of Pakistan
For Government

Attested



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13-02-2023

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