

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
AT CAMP COURT SWAT.

Service Appeal No. 291/2018

Date of Institution ... 16.2.2018

Date of Decision ... 03.12.2019

Zahir-ur-Rehman, Driver/Constable no. 449, Police Lines, Dir Upper.

... (Appellant)

VERSUS

The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and five others.

... (Respondents)

MR. SHAAZULLAH KHAN,
Advocate

For appellant.

MR. M. RIAZ KHAN PAINDAKHEL,
Assistant Advocate General

For respondents no. 1 to 3

MR. MUHAMMAD KAMRAN KHAN,
Advocate

For respondents no. 4.to 6

MR. AHMAD HASSAN,
MR. MUHAMMAD HAMID MUGHAL

MEMBER(Executive)

MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the parties heard and record perused.

ARGUMENTS.

02. Learned counsel for the appellant argued that he was appointed as Driver Constable on 10.01.2003. That the respondents notified a seniority list of Driver Constables of Dir Upper in which his name wrongly placed at serial no.4. He was senior to the private respondents. Feeling aggrieved, he filed departmental appeal and the competent authority constituted a committee to resolve the issue of seniority

of the appellant vis-à-vis private respondents. Through order dated 24.05.2016, the committee revised the seniority list of Driver Constables of Dir Upper wherein, the name of the appellant was put at an appropriate by showing him senior to the private respondents. To his astonishment, private respondents were promoted as Driver Head Constable vide impugned order dated 29.12.2014 and 13.12.2015. These orders were communicated to the appellant upon his request on 19.10.2017 and departmental appeal was preferred on 20.10.2017. Promotion given to the private respondents was against the rules and order passed to this effect had no value in the eyes of law.

03. Learned counsel for private respondents argued that they were rightly promoted under Police Rules 1934 on the basis of seniority-cum-fitness. As in the past punishments were awarded to the appellant and his service record was not satisfactory, therefore, he was not considered for promotion. The plea taken by the appellant that he never received the orders regarding promotion of private respondents was without substance, as the respondents widely disseminated these orders. Moreover, he was not fit for promotion. He also raised the issue of limitation that the present appeal was barred by time.

04. Learned Assistant Advocate General relied on arguments advanced by the learned counsel for private respondents.

CONCLUSION.

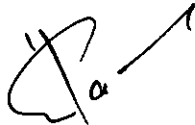
05. As regards the issue of limitation raised by the learned counsel for private respondents was concerned, though the appellant was considered for promotion but

ignored on the basis of wrong seniority list. Private respondents were promoted as Driver Head Constable vide order dated 29.12.2011 and 31.12.2015. However, in the absence of any solid evidence, denial by the respondents and perusal of available record, the plea taken by the appellant that he came to know about the said order on 19.10.2017 and filed departmental appeal on 20.10.2017 seems logical, convincing and worth consideration. Furthermore, on the basis of report dated 24.05.2016 and after correction of seniority position, it was incumbent on the respondents to have reviewed the promotion orders referred to above. Moreover, issues relating to promotion, confirmation and seniority were not hit by limitation, as held by superior courts in numerous judgments. In addition to this, it was against the cardinal principles of substantive justice to deprive a civil servant of his due right just on the strength of technicalities and when the respondents were unable to defend their case on merits. In this case illegalities, favoritism and arbitrary acts of the respondents have been proved beyond any shadow of doubt, therefore, the appellant has every right to be treated fairly on merit.

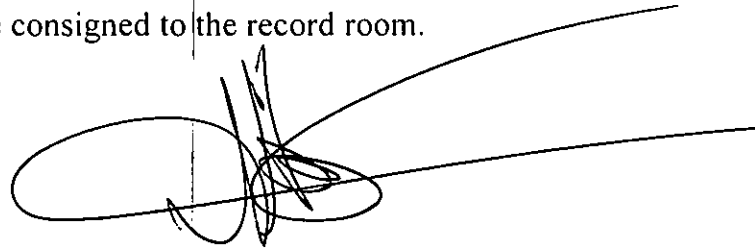
06. Now coming to the merits of the case, it is clarified that the appellant and private respondent no.4 were appointed as Driver Constable on 09.01.2003. However, being senior in age the appellant was shown senior to the private respondents. This fact was also confirmed by the order/report dated 24.05.2016 prepared by the committee on the directions of the competent authority. However, private respondents was wrongly promoted vide order dated 29.12.2014 and 31.12.2015. The record has established that these promotions were made on the basis of disputed seniority list which had no validity in the eyes of law and any promotion made on the basis of that was illegal and unlawful. The appellant was

entitled to be considered for promotion from 29.12.2014. The plea taken by the learned counsel for the private respondents that the appellant was ignored because of his service record/punishment was also a lame excuse and against the invogue rules/policy.

07. As a sequel to the above, the appeal is accepted, the impugned order dated 29.12.2014 is set aside to the extent of private respondent no.4. The respondents are directed to consider the case of promotion of the appellant from the due date. Parties are left to bear their own costs. File be consigned to the record room.



(MUHAMMAD HAMID MUGHAL)
Member



(AHMAD HASSAN)
Member
Camp court Swat

ANNOUNCED
03.12.2019

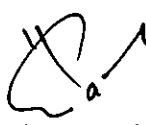
ORDER


03.12.2019

Appellant in person present. Mr. M. Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. nawab, ASI for official respondents no. 1 to 3 and counsel for private respondents no.4 to 6 present. Arguments heard and record perused.

Vide our detailed judgment of today of this Tribunal placed on file, the appeal is accepted, the impugned order dated 29.12.2014 is set aside to the extent of private respondent no.4. The respondents are directed to consider the case of promotion of the appellant from the due date. Parties are left to bear their own cost. File be consigned to the record room.

Announced:
13.12.2019



(Muhammad Hamid Mughal)
Member

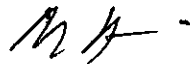

(Ahmad Hassan)
Member
Camp Court Swat

Service Appeal No. 291/2018

06.11.2019

Counsel for the appellant present. Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Umer Khitab, ASI for official respondents No. 1 to 3 and counsel for private respondents No. 4 to 6 present. Learned counsel for the appellant requested for adjournment. Adjourned to 03.12.2019 for arguments before D.B at Camp Court Swat.


(Hussam Shah)
Member
Camp Court Swat

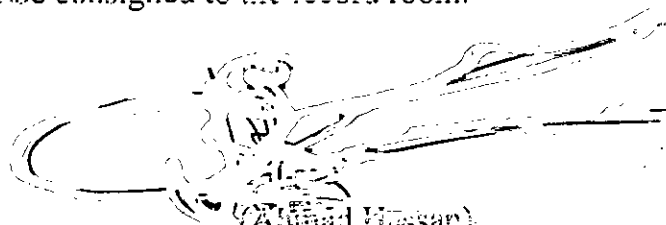

(M. Amin Khan Kundi)
Member
Camp Court Swat

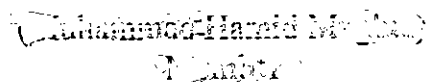
03.12.2019

Appellant with counsel present. Mr. M. Riaz Khan Paindakheil, Assistant Advocate General alongwith Mr. Nawab, ASI for official respondents no. 1 to 3 and counsel for private respondents no. 4 to 6 present. Arguments heard and record perused.

Vide our detailed judgment of today of this Tribunal placed on file, appeal is accepted, the impugned order dated 29.12.2014 and 10.12.2015 are set aside and the respondents are directed to consider the case of promotion of the appellant from the due date. Parties are left to bear their own cost. File be consigned to the record room.

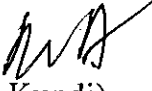
Announced
03.12.2019



(Ali Raza)
Member
Camp Court Swat


(Muhammad Haris)
Member
Camp Court Swat

11.06.2019

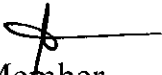
Appellant in person present. Mr. Mian Ameer Qadir, learned District Attorney for official respondents No. 1 to 3 and learned counsel for private respondent No. 4^{to 6} present. Appellant seeks adjournment. Adjourn. To come up for arguments on 03.09.2019 before D.B at Camp Court Swat.

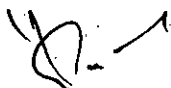

(M. Amin Khan Kundi)
Member
Camp Court Swat


(M. Hamid Mughal)
Member
Camp Court Swat

03.09.2019


Appellant with counsel present. Mian Amir Qadir, DDA for official respondents and counsel for private respondent no. 4 to 6 present. Learned DDA seeks adjournment. Adjourn. To come up for arguments on 08.10.2019 before D.B at camp court Swat.



Member


Member

08.10.2019

Counsel for the appellant present. Mian Amir Qadir, Deputy District Attorney for official respondents No. 1 to 3 and counsel for private respondents No. 4 to 6 present. Learned counsel for the appellant requested for adjournment. Adjourned to 06.11.2019 for arguments before D.B at Camp Court Swat.


(Hussain Shah)
Member
Camp Court Swat


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

06.03.2019

Appellant in person and Mian Amir Qadir, District Attorney alongwith Rizwanullah, S.I (Legal) for respondents present.

Appellant states, that the date of hearing in the instant matter was wrongly noted by his learned counsel as 07.03.2019. The learned counsel for appellant hails from Peshawar, therefore, a request is made for adjournment of instant matter to 07.03.2019.

Adjourned accordingly.

07.03.2019


Member
Counsel for the appellant and Mian Amir Qadir, District Attorney alongwith Rizwanullah, ASI for the official respondents present. Nemo for private respondents No. 4 to 6.


Chairman
Camp Court, Swat

Notice for the next date of hearing be sent to respondents No. 4, 5 and 6 who appeared to be necessary party in the proceedings.


Adjourned to 04.04.2019 before the D.B.



Member


Chairman
Camp Court, Swat

04.04.2019

Appellant in person present. Mr. Mian Ameer Qadir, District Attorney alongwith Mr. Umer Khitab, ASI (Legal) for official respondents No. 1 to 3 and private respondents No. 4 to 6 in person present. Due to strike of Pakistan Bar Council, learned counsel for the appellant is not available today. Adjourn. To come up for record and arguments on 11.06.2019 before D.B at Camp Court Swat.


(M. Amin Khan Kundi)
Member
Camp Court Swat


(M. Hamid Mughal)
Member
Camp Court Swat

11.10.2018

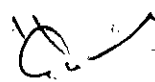
Since the case pertains to territorial limits of Malakand Region, therefore, the same is fixed for rejoinder and arguments on 05.12.2018 before the D.B at camp court, Swat. Parties may be informed accordingly.


Chairman

05.12.2018

Appellant absent. Mr. Usman Ghani learned District Attorney present. Case called but none appeared on behalf of appellant. Adjourn. To come up for 06.02.2019 before D.B at camp court Swat.



Member


Member
Camp Court, Swat

06.02.2019

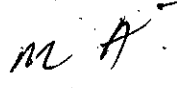
Appellant in person and Mian Amir Qadar learned Deputy District Attorney alongwith Rizwan Ullah SI present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 06.03.2019 before D.B at camp Court Swat.


Member


Member
Camp Court Swat.

03.07.2018

Junior counsel for the appellant and Mr. Sardar Shaukat Hayat, Addl: AG for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 17.08.2018 before S.B.


Member

17.08.2018

Appellant Zahir Rehman in person present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply not submitted. Learned AAG sought some time to submit the same. Granted. Case to come up for written reply/comments on 11.10.2018 before S.B.


Chairman

11.10.2018

Mr. Mir Zaman, Clerk of counsel for the appellant present. Mr. Muzaffar Khan, S.I (Legal) alongwith Mr. Kabirullah Khattak, Addl. AG for the respondents present. Written reply submitted. To come up for rejoinder, if any, and arguments on 08.11.2018 before the D.B.


Chairman

04.04.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that he was appointed as Driver Constable in the Police Department on 10.01.2013. A seniority list of Driver Constables of DIF Upper was issued by the respondents in which he was placed at Sr. no. 4 though older in age. Feeling aggrieved he filed departmental appeal and a committee was constituted for consideration his appeal. That vide order dated 24.05.2016 seniority was revised and the appellant was placed senior to private respondent no.4. However, on the basis of disputed seniority list private respondents were promoted to the rank of Driver Head Constable vide impugned order dated 24.12.2017 and 31.12.2015. He preferred departmental appeal on 20.10.2017 which was not responded within stipulated period, hence, the instant service appeal. Impugned order passed by the respondents is against the laws, rules and principles of natural justice. Despite the fact that disputed seniority list had been challenged by the appellant even then promotion were made on the basis of that seniority list in utter violation of rules. As issue of promotion is involved, hence, limitation would not affect the cause of action.

Appellant Deposited
Security & Process Fee

Points urged need consideration. Admit, subject to limitation. The appellant is directed to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 28.05.2018 before S.B.


(AHMAD HASSAN)
MEMBER

28.05.2018

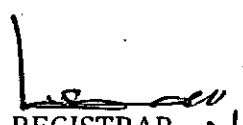


Junior to counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General present. Written reply not submitted. Learned AAG seeks time to file written reply/comments. Granted. To come up for written reply/comments on 03.07.2018 before S.B


Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 291/2018


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	02/03/2018	<p>The appeal of Mr. Zahir Rehman resubmitted today by Mr. Noor Muhammad Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 2/3/18</p>
2-	16/03/18	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/03/18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
19.03.2018		<p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 04.04.2018 before S.B</p> <p style="text-align: right;"> Member</p>

The appeal of Mr. Zahir-ur-Rehman Driver/Constable Police Lines Dir Upper received today i.e. on 16.02.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of seniority list mentioned in para-2(Annexure-C) and departmental appeal against it mentioned in para-3(Annexure-D&E) are not attached with the appeal which may be placed on it.
- 2- Annexures-B and C of the appeal are illegible which may be replaced by legible/better one.

No. 366 /S.T,

Dt. 19/02 /2018



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.

Note:

Sir,

That Seniority list and Department appeal are already attached as annexure- e & D, and objection on annexures B and C have been removed. Hence re-Submitted today dated 02/03/2018.


2/3/2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 29133 /2018

ZAHIR UR REHMAN VS POLICE DEPARTMENT

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
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3.	Application	A	5.
4.	Appointment order	B	6.
5.	Seniority list	C	7- 8.
6.	Application	D	9.
7.	Forwarding letter	E	10.
8.	Committee report	F	11.
9.	Impugned orders	G & H	12- 13.
10.	Departmental appeal	I	14.
11.	Vakalat nama	15.

APPELLANT

THROUGH:
NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 291 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 233

Dated 16/2/2018

Mr. Zahir-Ur-Rehman, Driver/Constable No. 449,
Police Lines Dir Upper.....

APPELLANT

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Regional Police Officer Malakand at Saidu Sharif, Swat.
- 3- The District Police Officer, Dir Upper.
- 4- Mr. Nasib Ullah, Head Constable/Driver No. 453,
Police Lines, Dir Upper.
- 5- Mr. Khaista Rehman, Head Constable/Driver No. 17,
Police Line, Dir Upper.
- 6- Mr. Muhammad Munir, Head Constable/Driver No. 427,
Police Line, Dir Upper

.....**RESPONDENTS**

**SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE ORDERS DATED 29-12-2014 & 31-12-
2015 COMMUNICATED TO THE APPELLANT ON 19-10-
2017 WHEREBY THE PRIVATE RESPONDENT NO. 4 TO 6
BEING JUNIORS TO THE APPELLANT HAS BEEN
PROMOTED TO THE RANK OF HEAD CONSTABLE DRIVER
WHILE THE APPELLANT WAS IGNORED & AGAINST NO
ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF
THE APPELLANT WITHIN THE STIPULATED PERIOD OF
90 DAYS**

PRAYER:

Filed to-day

Registrar

16/2/18

Re-submitted to-day
and filed.

That, on acceptance of this appeal the impugned orders dated 29-12-2014 & 31-12-2015 may very kindly be set aside and the respondents may be directed to consider the appellant for promotion to the rank of Head Constable/Driver w.e.f. the date when his junior were promoted i.e. 29-12-2014 with all consequential back benefits including seniority. Any other remedy which this Honourable Tribunal deems appropriate may also be awarded in favour of the appellant.

R/SHEWETH:

ON FACTS:

**Brief facts giving raise to the instant appeal are as
under:**

Registrar
2/3/18

1. That appellant was appointed as Driver Constable in the respondent Department vide order dated 10-01-2003. That right from appointment till date the appellant is serving the Department quite efficiently, whole heartedly and up to the entire satisfaction of his high ups. Copies of the application & appointment order is attached as annexure **A & B.**
2. That appellant during service as Constable Driver, the respondent Department issued seniority list of Driver Constables of District Dir (Upper). That according to the said seniority list the appellant was wrongly enlisted at Serial No. 4 of the said seniority list though the appellant was entitled to be ranked higher/senior to all the Private Respondents according to their date of births. Copy of Seniority List is attached as annexure **C.**
3. That appellant feeling aggrieved from the said Seniority List submitted Departmental Appeal before the Competent Authority and in response the Competent Authority constituted a committee for fixation of seniority of appellant vis-à-vis private respondents. Copies of the application & forwarding letter are attached as annexure **D & E.**
4. That, vide order dated 24-05-2016 the committee revised the seniority list of Driver Constables of District Dir (Upper) wherein the appellant was ranked senior than private respondent No. 4. That astonishingly the respondent Department on the previous disputed seniority list promoted the private respondents to the rank of Driver Head Constables vide impugned orders dated 29-12-2014 & 31-12-2015. Copies of the committee report & impugned orders are attached as annexure **F, G & H.**
5. That the said impugned order dated 29-12-2014 & 31-12-2015 communicated to the appellant on his request vide dated 19-10-2017, that feeling aggrieved the appellant preferred Departmental Appeal on 20-10-2017, but till date no reply has been received. Copy of the Departmental Appeal is attached as annexure **I.**
6. Hence the instant appeal on the following grounds amongst the others.

GROUND:

- A. That the impugned orders dated 29-12-2014 & 31-12-2015 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B. That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C. That the respondent Department acted in arbitrary and malafide manner by not promoting the appellant to the rank of Head Constable Driver inspite of eligibility and seniority.
- D. That promotion of the private respondents to the posts of Head Constable Driver is against the law and material facts hence not tenable in the eye of law and liable to be set aside.
- E. That the respondents inspite of knowing the fact that the seniority list is disputed and has challenged by the appellant before the appellate authority issued the impugned promotion orders dated 29.12.2014 and 31.12.2015 whereby the private respondents were promoted to the Rank of Driver head constables while the appellant was ignored.
- F. That the impugned orders are violative of section 9 of the Civil servant Act read with rule 7 of the Appointment, promotion and transfer Rules 1989.
- G. That not considering the appellant for promotion to the rank of Head Constable Driver the respondents acted in discriminatory manner.
- H. That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT


ZAHIR-UR-REHMAN

THROUGH:


NOOR MOHAMMAD KHATTAK


MUHAMMAD MAAZ MADNI
ADVOCATES

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2018

ZAHIR UR REHMAN VS POLICE DEPARTMENT

APPLICATION FOR CONDONATION OF
DELAY IN FILING THE ABOVE NOTED
APPEAL

R.SHEWETH:

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

GROUND OF APPLICATION:

- A- That valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.
- B- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

APPELLANT


ZAHIR UR REHMAN

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE

A-5

کوریج سے متعلقہ دستاویز

کوریج کے تحت درج ذیل امور

درج ذیل امور میں سے

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1978

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Other wire file -

Handwritten initials 'M' and 'SP'.

8.1.03

کوریج کے تحت درج ذیل امور

ATTESTED

Handwritten signature/initials.

ATTESTED
DIRECTOR UPPER

Handwritten signature and 'SSP DIR (U)'.

ORDER:

In exercise of the power vested in the under Police Rules 12-15 amended vide Govt: of NWFP Home and TAs Department Gazette Notification No. SO(P-I)/HD/13- E84, dated 18th January, 1989 further clarified vide Circular Order No. 2/1989 issued over CPO Peshawar Endst: No. 1004-81/E-II, dated 17th June 1989 the deficiency in educational qualification in respect of the following is hereby condoned for enlistment as Driver Constable in Dir Upper District:

1. Mohammad Munir S/O Mohammad Rehman R/O Panakot.
2. Khaista Rehman S/O Fazal Raziq R/O Gonori.
3. Zahir Rehman S/O Ahmad Shah R/O Panakot.
4. Nasibullah S/O Fazal Hamid R/O Panakot.

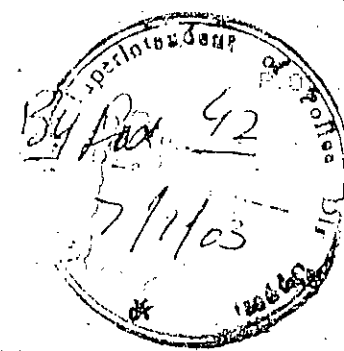
(FAQIR HUSSAIN)

Deputy Inspector General of Police,
Regional-III, Saidu Sharif, Swat

No. 79/F,

Dated: 6/1/2003,

B-6



ORDER:

In exercise of the power vested in me under Police Rules 12-15, amended vide Govt. of NWFP Home and TAs Department Gazette Notification No. SO(P-1) HD/13-1/84, dated 18th January, 1989 further clarified vide Circular Order No. 2 1989 issued over CPO Peshawar Endst No. 16041-81/E-II, dated 17th June 1989, the deficiency in educational qualification in respect of the following is hereby condoned for enlistment as Driver Constable in Dir Upper District:

1. Mohammad Munir S/o Mohammad Rehman r/o Panakot
2. Khista Rehman S/o Fazal Raziq r/o Gonori.
3. Zahir Rehman S/o Ahmad Shah r/o Panakot.
4. Nasibullah S/o Fazal Hamid r/o Panakot.

(Signature)
(FAQIR HUSSAIN)
Deputy Inspector General of Police,
Region III, Saidu Sharif, Swat.

No. 79 / 11,
Dated: 6/1/2003.

Copy to the Superintendent of Police Dir Upper for information and necessary action with reference to his Memo: No. 13687 EC, dated 28th December, 2002.

ATTESTED

(Signature)
(Signature)
SP

یہ کہ مذکورہ کسان کو عالی درجہ ایجوکیشن حاصل ہے۔ لیکن ان میں
9/2003 میں ہجرتی بیورو کنسٹیبل کی نمبر ایٹ کے لئے ان کے لئے ان کے لئے ان کے لئے
حصہ (2) مسٹر خالستہ رحمان ولد فضل رازق سکنہ سوربات تھانہ دیر
نمبر 17/3 مسٹر ظاہر رحمان ولد احمد شاہ سکنہ پناہ کوٹ تھانہ
دیر نمبر 449/4 مسٹر محمد منیر ولد محمد رحمان سکنہ پناہ کوٹ تھانہ
دیر نمبر 427 بلا تبادلات فوری طور پر عمل میں لائے گئے۔
اسماعیل نمبر 7 ڈسٹرکٹ سٹاف تھانہ دیر سے چوکی پاتراک
خان بہادر نمبر 302 چوکی پاتراک سے ٹائپسٹ دفتر P.W.
محمد خان 165 پولیس اسٹیشن سے ڈسٹرکٹ سٹاف دیر۔

دار فی ڈرائیورز نامہ کیلے کنٹریکٹ کے مورخہ 30/03/2017
 پور کنٹریکٹ نمبر ال ایف کے لیے جہاں نصیب اللہ ولد فضل
 حائند خاں ولد فضل رازقی سکینہ سو رہاٹ تھا نمبر 417
 مظاہر و حمزہ ولد احمد شاہ سکینہ پناہ کوٹ تھا نمبر 449
 شہزاد نصیر ولد محمد حمزہ سکینہ پناہ کوٹ تھا نمبر 427
 کلا تبادا جہاں نصیب اللہ ولد فضل کے لیے
 اسماعیل نمبر 7 ڈیپٹسٹیو سٹاف تھا نمبر 417 جو کی پائٹرن
 ان عہدہ نمبر 30/03/2017 جو کی پائٹرن سے
 مان کے لیے پور کنٹریکٹ کے لیے

ATTESTED
 [Signature]

8
 لیست در اجراء کی تاریخ بیداریش
 کوڑی گود و رک

سید انگری	گود و رک / اجی ڈیوٹی	تاریخ بیداریش	تاریخ بیداریش	نام	سنبر
Nil	Nil	10-1-2003	1978	خالد حسین	17/DFC
03	Nil	10-1-2003	1978	فہیمہ	427/DFC
Nil	6	9-1-2003	10-3-1980	لہیا	453/DFC
8	7	10-1-2003	1978	ظاہر رحمن	449/DFC

A. Hasnain

[Signature]
 District Police Officer,
 Dir Upper

ATTESTED
[Signature]

S/A

Ann-B (10)

Ann-B (10)



حکومت پاکستان

قومی شناختی کارڈ
15701-1319206-9

نام: طاہر الرحمن

جنس: مرد

تاریخ پیدائش: 01/01/1978



عثمان یوسف مین

دستور مجسٹریٹ جنرل

ATTESTED

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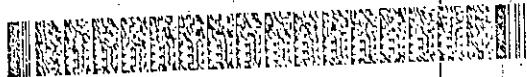
شناختی نمبر: 15701-1319206-9 - خاندان نمبر: UJ6852

موجودہ پتہ: پٹا گوٹ، ڈاگنہ درہ، کسبل درہ، ضلع اہودہ

10778206997

تاریخ اجراء: 08/12/2016

تاریخ سزا: 08/12/2026



D - 9

جناب عالی؛

گزارش ہیکہ سائیل کو جائز عرض معروض کی خاطر جناب DIG صاحب سوات کو پیش ہونا چاہتا ہے۔
بذریعہ درخواست استدعا ہے کہ سائیل کو پیش ہونے کی اجازت صادر فرما کر مشکور فرمائیں۔

العارض

المورخہ 13/4/2015

آپکا تابع فرمان ڈرائیور ظاہر رحمان 449 متعینہ پولیس لائن دیر بالا۔

Sir,
forwarded

Sir
Forwarded
Kurd

LO Dir U
13-4-2015

Ripalica line
Dir (U)
13.4.15

ATTESTED

MSI
moved

Handwritten signature

Forwarded Please

DSP Har Div
14-04-015

Handwritten signature
14/4/15

From: The District Police Officer,
Dir Upper.
To: The Regional Police Officer,
Malakand at Saidu Sharif Swat.

No: /EB Dated Dir Upper the / /2015.

Subject: **APPLICATION.**

Memo:

Enclosed please find herewith an application submitted by Driver
Constable Zahir Rahman No. 449 his application is sent herewith for kind consideration, please.

**District Police Officer,
Dir Upper.**

E-10

From: The District Police Officer,
Dir Upper.
To: The Regional Police Officer,
Malakand at Saidu Sharif Swat.

No: /EB Dated Dir Upper the / /2015.

Subject: **APPLICATION.**

Memo:

Enclosed please find herewith an application submitted by Driver
Constable Zahir Rahman No. 449 his application is sent herewith for kind consideration, please.

ATTESTED

[Handwritten signature]

**District Police Officer,
Dir Upper.**

[Handwritten signature]

COMMITTEE REPORT.

Dated: 24/05/2016

F-11

In compliance of CPO, Peshawar memo: No. 3014/E-IV, dated 17/03/2016, a committee was constituted to fix the seniority of MT Staff of Dir Upper District vide this office order Endst: No. 4415-20/E, dated 16/05/2016.

The committee after thoroughly examination of service records of the MT Staff Dir Upper, fixed their initial seniority in the light of PR 12.2(3) as under:-

S #	Name & No.	D/O Birth	D/O Enlisted as Driver Constable / Constable	D/O Absorption, Adjustment in MT Staff as Driver Constable
1.	HC Bacha Khan No. 236	1964	16/08/1982	OB No. 318 dated 19/05/1999
2.	HC Inayat Jan No. 79	15/03/1982	23/08/2000 as Driver Constable MRR quota of Dir Upper	30/04/2008
3.	HC Rehman Hakim No. 465	12/01/1980	01/07/2001 as Driver Constable	30/04/2008
4.	HC Islam Yousaf No. 489	1978	21/03/2002 as Driver Constable	30/04/2008
5.	DFC Alam Zeb No. 52	22/04/1978	26/07/2002 as Driver Constable. Latter on his appointment order was converted as Constable due to non availability of the sanctioned post / vacancy of Driver vide DPO, Dir Upper OB No. 506, dated 07/09/2002.	30/04/2008
6.	HC Khaista Rahman No. 17	09/01/1978	09/01/2003 as Driver Constable	30/04/2008
7.	HC Muhammad Munir No. 427	09/01/1978	09/01/2003 as Driver Constable	30/04/2008
8.	FC Zahir Rahman No. 449	05/04/1978	09/01/2003 as Driver Constable	28/12/2010
9.	HC Nasib Ullah No. 453	10/03/1980	09/01/2003 as Driver Constable	21/12/2010
10.	DFC Khalid Khan No. 263	1980	25/11/2010 as Driver Constable	25/11/2010
11.	DFC Bahadar Zeb No. 621	15/01/1981	27/07/2007 as Constable	14/12/2010
12.	DFC Shakirullah No. 20	1980	16/09/2011 as Driver Constable	16/09/2011

(Muhammad Zahid)
DSP, HQrs: Dir Upper

(Darvesh Khan)
DSP, HQrs: Swat.

(Imran Ullah)
Inspector Legal, Swat.

(Muhammad Riaz)
Office Supdt:
Region Office, Swat

(Hazrat Hussain)
Establishment Assistant,
Region Office, Swat

(Hanifullah)
OASI, Dir Upper

ATTESTED

(APPROVED)

(AZAD KHAN) Tst, PSP
Regional Police Officer,
Malakand, at Saidu Sharif Swat

G-12

Names and Nos of Driver Constables	DO Enstt	DO	Pay will be fixed on promotion as Driver Head Constable (BS-7) 5800-320-15400
Bacha Khan No.236	16/08/1982	17/05/1999	Rs.13150/-PM
Inayat Jan No.79	23/08/2000	23/08/2000	Rs.9640/-PM
Rehman Hakim No.465	01/07/2001	01/07/2001	Rs.9320/-PM
Islam Yousaf No.489	26/03/2002	26/03/2002	Rs.9320/-PM
Nasibullah No.453	09/01/2003	09/01/2003	Rs.8680/-PM
Khaista Rahman No.17	09/01/2003	09/01/2003	
Muhammad Munir No.427	09/01/2003	09/01/2003	
Zahir Rahman No.449	10/01/2003	10/01/2003	
Alam Zeb No.52	26/07/2002	30/07/2003	
Bahadar Zeb No.621	27/07/2007	14/12/2010	
Khalid Jan No.263 Inve	25/11/2010	25/11/2010	
Shakirullah No.20	16/09/2011	16/09/2011	

According to seniority fixed amongst the above mentioned driver Constables, officials at S/No 1 to 5 amongst their colleagues are entitle for promotion as Driver Constables against the existing vacancies.

(AN AKBAR KHAN)
HQRS (MEMBER)

(HUSSAIN ALI)
CLERK-HEADK CLERK (MEMBER)

(MOHYUDIN)
RI, POLICE LINES (MEMBER)

(JEHANGIR KHAN)
JR: CLERK-ESTT: CLERK (MEMBER)

APPROVED

Driver Constables from S/No.1 to 5 are promoted as Driver Head Constables (BS-7) as per their entitlement against the existing vacancies and on promotion as Driver Head Constables their pay as noted each is fixed accordingly.

ATTESTED

District Police Officer,
Dir Upper (CHAIRMAN)

No. 840
d. 29/12/2014

4984 /EB, Dated Dir Upper the, 29-12 /2014

Copy submitted to the Regional Police Officer, Malakand, Dir Upper, Swat for information with reference to this office Endst: No.4345-47/E, dated 12/12/2014 please.

District Police Officer,
Dir Upper

ORDER.

A Departmental promotion committee held in the office of the undersigned on 10.12.2015 the following Driver Constable BPS No. 5 were declared fit for promotion as driver Head Constable in BPS No. 7 (7490-415-19940) on the basis of seniority with immediate effect.

1. FC Khaista Rahman No. 17.
2. FC Muhammad Munir No. 427.

H - (13)

OB No. 940

Dated 29/12/ /2015.

[Signature]
District Police Officer,
Upper Dir

No. 5596 /EB, dated Upper Dir, the 31-12 /2015.

O/L

Copy of above is forwarded to the Regional Police Officer Malakand at Saidu Sharif, Swat for favour of information with reference to his office Memo No. 6884/E, dated 02.09.2015.

[Signature]
District Police Officer,
Upper Dir

ATTESTED

[Signature]

O/L

10/12/15

20/12/15

20/12/15

10.15

[Signature]

21/12/15

1/12

To

**The Deputy Inspector General of Police,
Malakand Division at saidu Sharif Swat.**

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED
ORDER DATED 29.12.2014**

R.Sir,

Most humbly it is stated that I was appointed as Driver Constable vide order dated 9.1.2003. That right from appointment till date I served the police Department quite efficiently and up to the entire satisfaction of my superiors.

That I along with my three colleagues were appointed on the same date i.e. 9.1.2003 and being senior in age I was entitled to be ranked senior to that of my three colleagues namely Khaista Rehman, Mohammad Munir and Nasib Ullah but unfortunately I was ranked junior to my above mentioned colleagues. Feeling aggrieved I filed Departmental appeal, upon my said Departmental appeal a committee was constituted and the said committee vide recommendation dated 24.5.2016 declared/recommended that I am senior than one of my colleague namely Nasib Ullah although I was entitled to be ranked senior than all of my colleagues.

That on the basis of wrong seniority list my junior colleague namely Nasib ullah was promoted to the Rank of Driver Head Constable (BPS-07) vide impugned order dated 29.12.2014. That in light of the committee report dated 24.5.2016 I am senior than Nasibullah and therefore, entitle for promotion to the Rank of Driver Head Constable (BPS-7) w.e.f. the date when my junior colleague has been promoted i.e. 29.12.2014.

Keeping in view of the above the impugned order dated 29.12.2014 may kindly be set aside and I may kindly be promoted to the Rank of Driver Head Constable (BPS-7) w.e.f. 29.12.2014 with all back benefits.

Dated: 20.10.2017

Yours Obediently,

ظہیر رحمان

Zahir Rehman, Driver Constable No.449,
Police Lines Dir Upper.

VAKALATNAMA

Before the KPK Service Tribunal Peshawar

_____ OF 2017

Zahir-ur-Rehman

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Police Department

(RESPONDENT)
(DEFENDANT)

I/We *Zahir-ur-Rehman*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2017

Zahir-ur-Rehman

CLIENT

Noor Mohammad Khattak

ACCEPTED

NOOR MOHAMMAD KHATTAK

&

Muhammad Maaz Madni
**MUHAMMAD MAAZ MADNI
ADVOCATES**

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 291/2018

Muhammad Zahir ur Rahman vs Police Department
..... Appellant.

VERSUS

2. The Inspector General of Police KPK Peshawar and
others..... Respondents.

PARA WISE REPLY ON BEHALF OF RESPONDENTS NO. 04, 05 & 06.

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS.

1. That the service appeal is badly time barred
2. That the appellant has concealed some material facts from this August Tribunal.
3. That the appellant has not comes to this Tribunal with clean hands.
4. That this service appeal is not tenable in its present form.
5. That the actions and reactions of the appellant are barred by law.

ON FACT.

1. Pertains to record, hence need no reply.
2. Incorrect, the seniority list was correct as per merit.
3. Pertains to record, hence need no reply.
4. Incorrect, the private respondents No. 04-06 were rightly promoted as per Police rules 1934, as they were senior-cum-fit-cum-efficient. The appellant was not promoted keeping in view his previous punishments. (character rule attach as Annexure "A")
5. Incorrect, being public document, the same was disseminated to all concerns, rather the appellant was dormented over his rights remained mum since 2014. Now at this belated stage he knocked the door of Honorable Tribunal, which is tentamount to kill the valuable time of the Tribunal.
6. That the appellant has got not cause of action to file instant appeal.

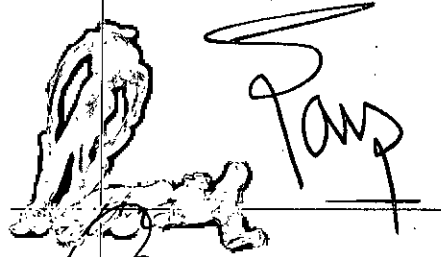
ON GROUNDS.

- A. *Incorrect, the impugned orders are recording to law.*
- B. *Incorrect, the appellant has been treated in accordance with law and rules. No right of the appellant has been violated at all.*
- C. *Incorrect, no malafide has been committed by the respondent department while dealing the case of the appellant.*
- D. *Incorrect, the promotion of private respondents are in accordance with law and rules.*
- E. *Incorrect, the impugned orders are rightly issued by the respondent department, as per law and rules.*
- F. *Incorrect, no section of the Civil Servant act 1973 and rule thereof has been violated by the respondent department.*
- G. *Respondents No. 04,05 & 06 were deserved, hence rightly promoted to the rank of Head Constables.*
- H. *The respondents also seek permission to adduce other grounds at the time of argument, after leave of the Honorable Tribunal.*

PRAYER.

*It is therefore humbly prayed that on acceptance of para wise reply,
the appeal may graciously be dismissed with costs.*

*Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.*



*Regional Police Officer,
Malakand at Saidu Sharif Swat.*

*Regional Police Officer,
Malakand at Saidu Sharif Swat.*

*District Police Officer,
Dir Upper.*



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 291/2018

Muhammad Zahir ur Rahman vs Police Department

REPLY TO THE APPLICATION FOR CONDONATION OF DELAY

RESPECTFULLY SHEWETH:-

- A. *The limitation is very exhaustive principle of law and every case must be decided as per limitation.*
- B. *Every case has it's own merits and facts and there are plethora of cases of superior Courts which insists on limitation.*

It is therefore prayed, that on acceptance of this reply, the application of condonation of delay may please be dismissed with costs.

*Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.*

*Regional Police Officer,
Malakand at Saidu Sharif Swat.*

*District Police Officer,
Dir Upper.*

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[Handwritten signature]
Regional Police Officer,
Malakand at Saidu Sharif Swat.

[Handwritten signature]

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 291/2018

Muhammad Zahir ur Rahman vs Police Department
..... Appeallant.

VERSUS

District Police Officer, Dir Upper & Others..... Respondents.

AUTHORITY LETTER

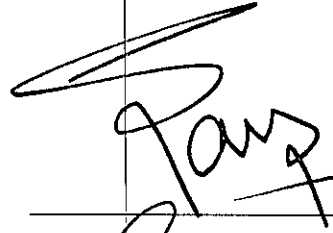
We the undersigned do hereby authorized Muzaffar Khan Inspector
Legal to appear on my behalf before the Court on each and every date.

He also authorized to file para wise comments, and also submit the
all relevant documents before the court.

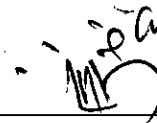
Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Regional Police Officer,
Malakand at Saidu Sharif Swat.

District Police Officer,
Dir Upper.



Regional Police Officer,
Malakand at Saidu Sharif Swat



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 291/2018

Muhammad Zahir ur Rahman vs Police Department
..... Appeallant.

VERSUS

District Police Officer, Dir Upper & Others..... Respondents.

AFFIDAVIT

I the undersigned do hereby solemnly affirm and declared that the contents of parawise reply are true and correct to the best of our knowledge and belief and nothing has been concealed from this honorable court.



Deponent
SI Muzafar Khan Upper Dir

15—CENSURES AND PUNISHMENTS.

Charge: - Absence from 24⁹/₀₄ to 25⁹/₀₄
 Punishment: - one day leave with out pay.

ESP / DIR - U

Charge: Three days absences from 19⁷/₂₀₁₀ to 22⁷/₁₀
 Punishment: Three days counted w/o pay.

OB NO: 677
 dt. 3.8.2010

DPO (U) DIR.

Charge: Two days absence

Punishment: Two days absences counted as
 w/o pay.

OB NO: 520

DPO (U) DIR

14.6.2010

Charge: one days absence

Punishment: one days counted w/o pay

OB NO: 645

DPO (U) DIR

24.9.2014

Charge: 14 Hours and 40 Minutes are
 absented from duty.

Punishment: warning to be Careful in
 future

DSP HOS

No 1172/OSP-HO, DW
24/10-08

It has been learnt through reliable source that Zahir Ramee Sonier of Panahat is involved in timber smuggling. His attitude is not good with the people - Please conduct inquiry & report your comments as soon as possible.

Ganraj
DPI DW 14,

23710708.

No 4054 / 62
DT 23/10 / 2008

COMMITTEE REPORT. Dated: 24/05/2016

In compliance of CPO, Peshawar memo: No. 3014/E-IV, dt 17/03/2016, a committee was constituted to fix the seniority of MT Staff of Dir Upper District vide this office order Endst: No. 4415-20/E, dated 16/05/2016.

The committee after thoroughly examination of service records of MT Staff Dir Upper, fixed their initial seniority in the light of PR 12.2(3) as under:-

S #	Name & No.	D/O Birth	D/O Enlisted as Driver Constable / Constable	D/O Absorption Adjustment in MT Staff as Driver Constable
1.	HC Bacha Khan No. 236	1964	16/08/1982	OB No. 318 date 19/05/1999
2.	HC Inayat Jan No. 79	15/03/1982	23/03/2000 as Driver Constable MRR quota of Dir Upper	30/04/2008
3.	HC Rehman Hakim No. 465	12/01/1980	01/07/2001 as Driver Constable	30/04/2008
4.	HC Islam Yousaf No. 489	1978	21/03/2002 as Driver Constable	30/04/2008
5.	DFC Alam Zeb No. 52	22/04/1978	26/07/2002 as Driver Constable. Latter on his appointment order was converted as Constable due to non availability of the sanctioned post / vacancy of Driver vide DPO, Dir Upper OB No. 506, dated 07/09/2002.	30/04/2008
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7.	HC Muhammad Munir No. 427	09/01/1978	09/01/2003 as Driver Constable	30/04/2008
8.	FC Zahir Rahman No. 449	05/04/1978	09/01/2003 as Driver Constable	28/12/2010
9.	HC Nasib Ullah No. 453	10/03/1980	09/01/2003 as Driver Constable	21/12/2010
10.	DFC Khalid Khan No. 263	1980	25/11/2010 as Driver Constable	25/11/2010
11.	DFC Bahadar Zeb No. 621	15/01/1981	27/07/2007 as Constable	14/12/2010
12.	DFC Shakirullah No. 20	1980	16/09/2011 as Driver Constable	16/09/2011

(Muhammad Zahid)
DSP, HQrs: Dir Upper

(Darvesh Khan)
DSP, HQrs: Swat.

(Imran Ullah)
Inspector Legal, Swat

(Muhammad Riaz)
Office Supdt:
Region Office, Swat

(Hazrat Hussain)
Establishment Assistant,
Region Office, Swat

(Hanifullah)
OASI, Dir Upper

(APPROVED)


(AZAD KHAN) Tst, PSP
Regional Police Officer,
Malakand, at Saidu Sharif Swat

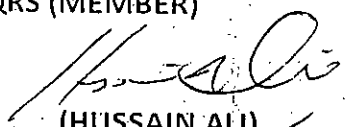
G-(12)

Names and Nos of Driver Constables	DO Enstt	DO	Pay will be fixed on promotion as Driver Head Constable (BS-7) 5800-320-15400
Bacha Khan No.236	16/08/1982	17/05/1999	Rs.13150/-PM
Inayat Jan No.79	23/08/2000	23/08/2000	Rs.9640/-PM
Rehman Hakim No.465	01/07/2001	01/07/2001	Rs.9320/-PM
Islam Yousaf No.489	26/03/2002	26/03/2002	Rs.9320/-PM
Nasibullah No.453	09/01/2003	09/01/2003	Rs.8680/-PM
Khaista Rahman No.17	09/01/2003	09/01/2003	
Muhammad Muni No.427	09/01/2003	09/01/2003	
Zahir Rahman No.449	10/01/2003	10/01/2003	
Alam Zeb No.52	26/07/2002	30/07/2003	
Bahadar Zeb No.621	27/07/2007	14/12/2010	
Khalid Jan No.263 Inve	25/11/2010	25/11/2010	
Shakirullah No.20	16/09/2011	16/09/2011	

According to seniority fixed amongst the above mentioned driver Constables, officials at S/No 1 to 5 amongst their colleagues are entitle for promotion as Driver Constables against the existing vacancies.


AN AKBAR KHAN)
HQRS (MEMBER)

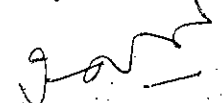

(MOHYUDIN)
RI, POLICE LINES (MEMBER)


(HUSSAIN ALI)
CLERK-HEADK CLERK (MEMBER)


(JEHANGIR KHAN)
JR: CLERK-ESTT: CLERK (MEMBER)

APPROVED

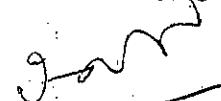
Driver Constables from S/No.1 to 5 are promoted as Driver Head Constables (BS-7) as per their entitlement against the existing vacancies and on promotion as Driver Head Constables their pay as noted each is fixed accordingly.


District Police Officer,
Dir Upper (CHAIRMAN)

No. 840
d. 29/12/2014

4984 /EB, Dated Dir Upper the, 29-12 /2014

Copy submitted to the Regional Police Officer, Malakand, Dir Upper, Swat for information with reference to this office Endst: No.4345-47/E, 12/12/2014 please.


District Police Officer,
Dir Upper

undersigned on 10.12.2015 the following Driver Constable BPS No. 5 were declared fit for promotion as driver Head Constable in BPS No. 7 (7490-415-19940) on the basis of seniority with immediate effect.

13

1. FC Khaista Rahman No. 17.
2. FC Muhammad Munir No. 427.

OB No. 940

Dated 29/12/ 2015.

[Signature]
District Police Officer,
Upper Dir.

No. 5596 /EB, dated Upper Dir, the 31-12 /2015.

o/c

Copy of above is forwarded to the Regional Police Officer Malakand at Saidu Sharif, Swat for favour of information with reference to his office Memo No. 6884/E, dated 02.09.2015.

cat

[Signature]
District Police Officer,
Upper Dir.

o/c

[Handwritten mark]

17/12/15

1001

[Handwritten mark]

10.15

[Handwritten mark]

[Handwritten mark]

14

29/08

15-CENSURES AND PUNISHMENTS.

Charge: Absence from 24⁹ to 25⁹
Punishment - one day leave with out pay

ESP / AIR - 22

Charge: Three days absences from 19⁷ to 22⁷
Punishment: Three days counted w/o pay

OB NO 677
dtl 3.8.2010

DPO (w) DIR

Charge: Two days absence
Punishment: Two days absences counted as w/o pay

OB NO 520
14.6.2010

DPO (w) DIR

Charge: one days absence
Punishment: one day counted w/o pay

OB NO 645
24.9.2014

DPO (w) DIR

Charge: 14 Hours and 40 Minutes are absent from duty
Punishment: warning to be careful in future

DSP: HGS

No 1172/OSP-HO: DW
24/10-08

It has been learnt through reliable source
that Zahir Ramee Sonar of Panahat
is involved in timber smuggling. He is
His attitude is not good with the
people - Please conduct inquiry &
Report your comments as soon as
possible.

Amulya

DPI, DW, U,

23/10/08.

No 4054 / 62
DT 23/10 / 2008

ORDER

The following Constables who were appointed as temporary
Constables are hereby adjusted against the newly created Posts
of Drivers with immediate effect.

1. Constable Inayat Jan No. 79
2. Constable Rehman Hakim No. 465
3. Constable Islam Yousaf No. 489
4. Constable Alam Zeb No. 52
5. Constable Rehmat Khan No. 20
6. Constable Muhammad Munir No. 427
7. Constable Khaista Rehman No. 17

O.B. No. 187

DATED 30-4-08

Awal Khan

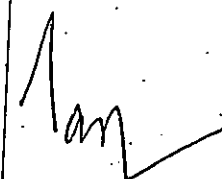
Distt. Police Officer,
Dir. Upper

O R D E R.

Constable Nasib Ullah No.453 who was appointed as temporary Driver Constable is hereby adjusted the vacant post of Driver with immediate effect.

O.B NO. 1081

DATED 21.12.2010



DISTT: POLICE OFFICER,
D R UPPER.

Blood Group A(+ve)

Contact #

PAKISTAN

1. Issued by Gov of Khyber Pakhtun Khwa
2. Valid all over Pakistan
3. In the event of loss the card holder should report to the nearest police station
4. If found, please drop into the nearest letter box

www.pktrafficpolice.gov.pk

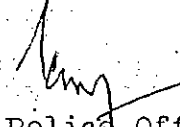


ORDER.

Constable Zahir Rahman No 449 was appointed as temporary Driver Constable is hereby adjusted on the vacant post of Driver with Immediate effect.

OB NO 1095

DT: 28.12.20


District Police Officer,
Bir Upper.

پولیس لائن

تقلی 24 روز تا 9/17

ضلع دریا

24 رپورٹ غیر حاضر صیب سید ۱۲۱۵ فورم 9/17 وقت 22:00 بجے 7 بجے فنانس شریفل
 کا ڈرائیور خان مستر علی نے 17 عصر صابک فہ سے بوجہ بیماری میڈیکل / رخصت استفاقیہ پر ہے
 اس بنا پر ڈرائیور صاحب اللہ 332 کو الہ نہ 14 روز تا 8/23 فنانس شریفل بھیجا ہے
 مذکورہ کی اب تک کفر خود نہ جان کے حاضر 440 صا. فنانس شریفل لائن سے ڈرائیور
 بھیجوانے کا کیا۔ اس واسطے ڈرائیور کا براہن 449 کو الہ نہ 11 بالا روانہ کیا ہے۔
 اس وقت فنانس شریفل سے معلومات ہو کر سٹارخان 178 صدر محرم جو اب لیا کہ
 کا براہن 449 فنانس شریفل کو حاضر نہیں کیا ہے۔ میں مذکورہ کے خلاف رپورٹ
 غیر حاضر درج روز تا 9/17 ہو کر مذکورہ پولیس ملازمت کے ساتھ وفا نہیں کرتا ہے
 بروقت غیر حاضر ہوتا رہتا ہے۔ اور رپورٹ غیر حاضر کو اپنے ساتھ میرا ذاتی
 ڈی آر ٹی لغور کرتا ہے۔ ایک طرف ڈرائیور ان کی کمی ہے دوسری طرف ڈرائیور ان
 کا یہ عمل ہے۔ صبح پونے پر فنانس شریفل ڈرائیور بھیجوانے کا مناسب بندوبست
 کیا جائیگا۔ ڈرائیور ان کی کمی اور عمل سے ممکن ہے۔ کہ میں میرا پاونٹا
 انڈرین بارہ آئیرن بالاکو بڑی درخواست میں کروونٹا محرم سٹاف
 کے نوٹس میں لایا گیا کہ لنگر حکیمہ مرتب کرنے آئیرن بالاکو صرف
 ارسال کرے۔ جاہ عالی

تقلی بمطابق اہل

17-9-04

Sir Forwarded

Copy

Lo-Dar (U)

FORWARDED

B-9-04

Signature

DSP 18-9-04

۲۰۰۶

۱- تقریریں ۱۷ اسیح ۶ ۹۵۱۳ وقت ۱۷۱۱۵ ۱۹

۱- تقریریں ۱۷ اسیح ۶ ۵۱۴۵ وقت ۱۷۱۱۵ ۱۹
۱- تقریریں ۱۷ اسیح ۶ ۴۴۹ وقت ۱۷۱۱۵ ۱۹
۱- تقریریں ۱۷ اسیح ۶ ۳۸۵ وقت ۱۷۱۱۵ ۱۹
۱- تقریریں ۱۷ اسیح ۶ ۳۸۵ وقت ۱۷۱۱۵ ۱۹
۱- تقریریں ۱۷ اسیح ۶ ۳۸۵ وقت ۱۷۱۱۵ ۱۹

۲۰۰۶
۲۱-۰۶-۱۳

۱- تقریریں ۱۷ اسیح ۶ ۴۴۹ وقت ۱۷۱۱۵ ۱۹
۱- تقریریں ۱۷ اسیح ۶ ۳۸۵ وقت ۱۷۱۱۵ ۱۹
۱- تقریریں ۱۷ اسیح ۶ ۳۸۵ وقت ۱۷۱۱۵ ۱۹

۲۰۰۶
۲۱-۰۶-۱۳

جناب عالی!
کسیل مذکورہ کی آئیہ لوم
غیر جانبدار طریقہ پر
رہتے ہوئے سفارش کی جاتی ہے

۱/ سوپہ Kohistan
۲۶-۰۶-۱۳

OB No 497
28/8/013

خانہ سید صاحب

ضلع دیر نال

تقریر 26 روزانہ 7/10 19

26 رپورٹ
نقل جولا 1150 بجے 7 بجے اور 10 بجے اس وقت تک تیل ضلعا میر الرحمن 142 بجے
مگر ہاضمی
نہ ملاحظہ 7 بجے لوجہ شد صورت 15 بجے دفعہ انعامتہ چہ خود دوا نہ کیا
کیا ہاضمی ملاحظہ ہو کافی انتظار کے بعد تیل مذکورہ تھا حاضر نہ آیا۔ میں
تیل مذکورہ کے خلاف رپورٹ لکھ حاضر کردہ روزانہ 7 بجے ہو کر تیل روت بفرق بنا
کاروائی رپورٹ لکھ کر دینا چاہی۔

مناب علی
دائرہ مطابقت
m.m.p.s. Jager
22-7-10

لقد علمت في يومنا هذا 17
500 8 18185

صفر 17
بدره 449
بدره 449
بدره 449

دره 449
مجلس دیناری

21,06.013

عاشقِ شکرینگل

ضلع دریا

نمبر 29 دریا جی 31/05

فرد 29 اورنگ علیہ حاضرہ ماسی مورخ 31/05 وقت 20:18:25 اس وقت درج شد ڈرائیور ظاہر رفلن 446 تھا ہزار میں بحالت ڈرائیور تعینات ہے۔ اور اورنگ جی سے ثابت ہے۔ اور ڈرائیور سے کوئی کی معلومات نہیں ہے۔ اور علیہ اشعوان mm لکائی۔ جو تھا ہزار سے ثابت ہے۔ سب سے ڈرائیور ظاہر رفلن 446 کے خلاف اورنگ علیہ حاضرہ اورنگ جی سے جو کہ ان قدر مفصل بیان دیا جا کر اور سب واقعات اسٹاٹ حاضرہ / علیہ حاضرہ اور ان باہر اور وقت میں جو حق مناسبت کارروائی ارسال کی جائے گی۔

عاشقِ شکرینگل
 کفیل نامہ لکھی اورنگ جی
 mmppssgal
 10-2-05