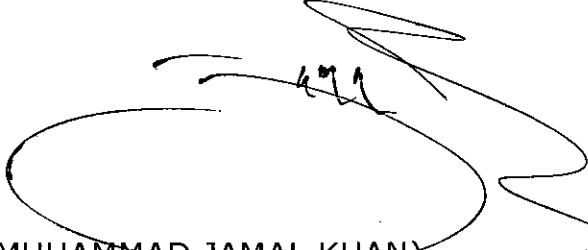


16.11.2020

Petitioner is present in person. Mr. Riaz Ahmad Paindakheil, Assistant Advocate General and Mr. Shamraiz Khan, ASI (Legal), for the respondents are also present.

Representative of the department submitted implementation report to which the penalty of dismissal from service of petitioner Mudassir Khan Ex-Constable No. 934 was modified and converted into forfeiture of approved service for a period of three years which has been rectified by issuance of corrigendum order and accordingly, his punishment was converted into forfeiture of approved service for two years instead of three years with effect from 23.05.2018 to be efficacious forthwith. Furthermore, in compliance thereof while giving effect to the judgment of this Tribunal an amount of Rs. 344800/- has been paid to the petitioner vide Payroll System Amendment Form Multiple Employee Entry which is placed on record. Since the entire claim of petitioner has been satisfied which he has admitted outrightly before the bench, hence, the execution petition is filed being satisfied. File be consigned to the record room.

ANNOUNCED
16.11.2020

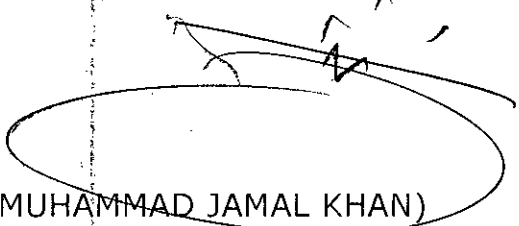

(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

16.09.2020

Petitioner has not forth come despite making of repeated calls at different interval and the last call in this regard was made on 12:38 P.M. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Atif Ali, Litigation Officer are present.

The last two adjournments were made on the basis of note Reader due to spread of disease of COVID-19 and summer vacation, therefore, in the circumstances it is deemed appropriate to issue notice to petitioner as well as his respective counsel.

Adjourned to 16.11.2020 for further proceedings before S.B at Camp Court, Abbottabad.


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

CORRIGENDUM ORDER

In compliance with the judgment dated 23-05-2018 passed by the Honorable Service Tribunal Camp Court Abbottabad in Service Appeal No. 1223-A/2016 and in continuation to this office Order No. 3091-92 dated 23-04-2019 wherein penalty of dismissal from service of Mudassar Khan Ex-Constable No.934 was modified and converted into forfeiture of approve service for a period of 03 years is hereby rectified and his punishment is converted into forfeiture of approved service for 02 years instead of 03 years with effect from 23-05-2018 with immediate effect.


District Police Officer
Abbottabad

OB No. 225
Dated 11-12-15

Copy to the:-

1. DSP Legal, Abbottabad.
2. Office Superintendent, DPO Office Abbottabad.
3. Pay Officer, DPO Office Abbottabad.
4. EC & OHC, DPO Office Abbottabad.



**PAYROLL SYSTEM
AMENDMENT FORM
MUTIPLE EMPLOYEE ENTRY**

OFFICE OF THE **District Police Officer, Abbottabad**

FOR THE MONTH OF **12** /2019.

DDO CODE (COST CENTER) **A D 4 0 2 2** Description **District Police Officer**

Personal Number **0 0 4 3 5 3 4 4** Mudassir Khan No.

Grace (Pay Scale Group) **0 7** Constable

National ID Card No. **13101-**
Salary Status Start Stop

Info Type	GENERAL DATA CHANGE		Wage Type	CHANGE IN PAYMENTS/DEDUCTIONS					Adj: Pay for the M/O	Effective Date	
	Field ID	New Content		Amount							
				Rupees	Paise	Adj					
		B.Pay	5801	1	7	0	7	6	7		01-12-2019
		House Rent	5002	1	6	8	2	5			
		Convince All	5011	2	1	2	5	0			
		Medical All	5012	1	6	5	0	0			
		Ration all	5054	7	4	9	1				
		washing	5070	1	6	5	0				
		C.R.A	5079	3	3	0	3				
		Risk All	5879	3	8	8	3	0			
		Special Incentive	5878	8	5	8	4				
		AR 2013	5309	3	8	2	7				
		Fix Daily Allowance	5945	3	0	0	3	0			
		AR 2015	5964	2	5	7	4				
		AR 2016	5975	1	3	1	4	4			
		AR 2017	5990	1	7	0	7	7			
		AR 2018	5322	1	5	1	9	5			
		Total Pay		3	6	6	9	8	7		
		GPF Deduction	6075	1	1	1	1	0			
		Welfare Fund	5956	3	4	8	7				
		Retired Benefit	6217	7	5	9	0				
		Net Pay		3	4	4	8	0	0		

Adjustment pay for the period from 23-05-2018 to 23-04-2019 by the honorable Court of Service Tribunal KPK Peshawar vide Service Appeal No.1223/2016 date of decision 23-05-2018 Order and Service Book is enclosed.

DISTRICT POLICE OFFICER
ABBOTTABAD

Audited/Checked By

Entered/Verified By

DETAIL OF PAY AND ALLOWANCE OF FC MUDASSIR KHAN NO. W.E.FROM 23-05-2018 TO 23-04-2019

Period		B.Pay	H.RA	C.A	M.A	R.A	W.A	Risk All:	C.R.A	Insen: Allow:	AR 2013	Fixed Daily	AR 2015	AR 2016	AR2017	AR 2018
From	To															
23-05-18	30-11-18	95120	9251	12042	9350	4245	935	22003	1873	4830	2169	17017	1459	7448	9512	7630
01-12-18	23-04-19	75647	7574	9208	7150	3246	715	16827	1430	3694	1658	13013	1115	5696	7565	7565
TOTAL		170767	16825	21250	16500	7491	1650	38830	3303	8524	3827	30030	2574	13144	17077	15195

17.12.2019

Petitioner in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Shamraiz Khan, ASI for the respondents present. Representative of the department submitted implementation report dated 11.12.2019. The same is placed on record. Petitioner requested for adjournment to examine the same. To come up for objection petition on implementation report, if any, on 17.02.2020 before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

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

Reader

Due to summer vacation case to come up for the same on 16/09
/20 at camp court abbottabad.




Reader

19.11.2019

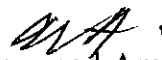
Counsel for the petitioner present. Mr. Usman Ghani, District Attorney alongwith Mr. Shamriaz Khan, ASI for respondents present.

Learned counsel for the appellant invited attention to concluding para of the judgment passed by this Tribunal on 23.05.2018, where-under modified penalty of forfeiture of approved service for three years alongwith stoppage of two annual increment for three years was awarded to the petitioner. However, respondents implemented the judgment referred to above through order dated 23.01.2019 i.e, after a lapse of almost one year. The order referred to above is defective on the ground that according to Police Rules 1975 forfeiture of approved served was permissible up to a maximum of two years thus the present order needed rectification. Respondents failed to come up with any solid explanation/justification why they failed to implement the judgment referred to above in time. Apparently, the petitioner appeared to be entitled for pay etc for the period from the date of judgment till issuance of order dated 23.01.2019. Respondents are directed to submit a concise statement explaining the above position on or before the next date of hearing. Case to come up for further proceedings on 17.12.2019 before S.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad


10.07.2019

Counsel for the petitioner and Mr. Shamraiz Khan, ASI alongwith Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Objection petition on the implementation report has been submitted by the learned counsel for the petitioner. The same is placed on record. Case to come up for arguments on 18-9-19.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

18.09.2019


Petitioner in person and Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Shamraiz Khan, ASI for the respondents present. Representative of the department submitted implementation report which is placed on record. Petitioner seeks adjournment to examine the same. Adjourned to 19.11.2019 for further proceeding before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

17.04.2019


Counsel for the petitioner present. Mr. Muhammad Bilal, DDA alongwith Mr. Shamriaz Khan, ASI for respondents present.

Implementation of judgment of this Tribunal dated 23.05.2018 is being delayed deliberately by the respondents on one pretext or the other. On the last date of hearing they were directed to produce restraint order if any, issued by the august Supreme Court of Pakistan or provide provisional implementation report. Today again provisional implementation order has not been submitted. In these circumstances, the Tribunal is left with no other option but to adopt coercive measures against the respondents. As a first step warrants of attachment of salary of respondent no.3 and 4 may be issued forthwith. They are again directed to produce provisional implementation report on the next date of hearing, positively. Case to come up for further proceedings on 23.05.2019 before S.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad


23.05.2019

Petitioner alongwith his counsel and Mr. Shamraiz Khan, ASI alongwith Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Representative of the department submitted implementation report. Learned counsel for the petitioner has expressed objections on the same. To come up for objections petition and arguments on implementation report on 10.07.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

18.12.2018

Petitioner in person present. Mr. Usman Ghani, District Attorney for the respondents present. Notices be issued to the respondents for submission of implementation report on 18.03.2019 before the S.B at camp court, Abbottabad.


Member
Camp court A/Abad




18.03.2019

Petitioner in person and Mr. Muhammad Bilal learned Deputy District Attorney alongwith Shamrez SI present. Representative of the respondent department seeks adjournment on the ground that the respondent department has filed CPLA against the judgment under implementation. Adjourn. Representative is directed to furnish order regarding suspension of operation of the judgment in question else conditional implementation subject to the outcome of CPLA. Adjourn. To come up for further proceedings on 17.04.2019 before S.B


Member
Camp Court A/Abad.

Form- A
FORM OF ORDER SHEET

Court of _____
Execution Petition No. 301/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26.09.2018	<p>The execution petition of Mr. Mudassar Khan submitted by Qazi Muhammad Sheraz Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR 26/9/18</p>
2-	27-09-2018	<p>This execution petition be put before S. Bench at A.Abad on <u>13-11-2018</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
13.11.2018		<p>Petitioner in person present. Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 18.12.2018 at camp court Abbottabad.</p> <p style="text-align: right;"> Reader A/Abad</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

Execution Petition No. 301/18

Service Appeal No. 1223-A/2016

Dated *26-9-18*

Mudassar Khan son of Jehangir Khan, resident of Maira Mandroach, Nawanshehr,
Tehsil & District Abbottabad.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, KPK, Peshawar & others.
2. IGP, Khyber Pakhtunkhwa, Peshawar.
3. Regional Police Officer, Hazara Range, Abbottabad.
4. District Police Officer, Abbottabad.
5. SDPO, Havelian, Abbottabad.

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR IMPLEMENTATION OF THE
ORDER DATED 23/05/2018.

Respectfully Sheweth:-

1. That the appellant's service appeal remained under adjudication in Honourable Court.
2. That on 23/05/2018 Honourable Court re-instated petitioner with certain punishments. Copy of order is attached herewith).
3. That since 23/05/2018 petitioner filed many applications to respondents to comply with the order

passed by Honourable Court on 23/05/2016 but respondents turned deaf ear to the petitioners issue and as well ignored the order of Honourable Court.

4. That the conduct of the respondent is not only violation of the fundamental rights but also amounts to Contempt of Honourable Court.
5. That the respondents are swollen head obstinate officers who had straight away refused to honour above mentioned verdict, thus petitioner is having no other option except to file instant application, in hand.
6. That valuable rights of the petitioner are involved.

It is humbly prayed that respondents be directed to reinstate according to the orders issued by this Court on 23/05/2018.

Muhammad Sheraz
Cherry

...APPELLANT

Through

Muhammad Sheraz
Cherry

(Qazi Muhammad Sheraz)
Advocate High Court, Abbottabad

Dated: 26/09/2018

AFFIDAVIT:

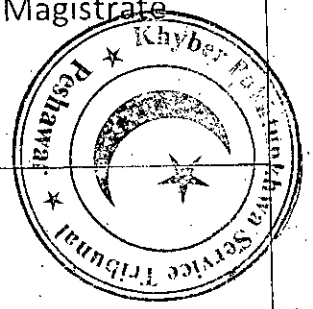
I, Mudassar Khan son of Jehangir Khan, resident of Maira Mandroach, Nawanshehr, Tehsil & District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

Muhammad Sheraz
Cherry

DEPONENT



25/9/18



Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	23.05.2018	<p style="text-align: center;"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> <u>AT CAMP COURT ABBOTTABAD</u></p> <p style="text-align: center;">Service Appeal No. 1223/2016</p> <p style="text-align: center;">Date of Institution ... 08.12.2016 Date of Decision ... 23.05.2018</p> <p style="text-align: center;">Mudassar Khan S/O Jehangir Khan resident of Maira Mandroach, Nawansher, Tehsil & District Abbottabd.</p> <p style="text-align: right;">Appellant</p> <ol style="list-style-type: none">1. Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs,, Khyber Pakhtunkhwa, Peshawar.2. IGP, Khyber Pakhtunkhwa, Peshawar.3. Regional Police Officer, Hazara Range, Abbottabad.4. District Police Officer, Abbottabad.5. SDPO, Havelian, Abbottabad. <p style="text-align: right;">Respondents</p> <p style="text-align: center;">MR. SUBHAN SHER MR. MUHAMMAD HAMID MUGHAL</p> <p style="text-align: right;">CHAIRMAN MEMBER</p> <p><u>JUDGMENT</u></p> <p><u>MUHAMMAD HAMID MUGHAL, MEMBER:</u> - Learned counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present.</p> <p>2. The appellant (Ex-Constable) has filed the present appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against order dated 15.07.2016 whereby the appellant was awarded punishment of dismissal from service from the date of his absence from duty under Police Rules 1975. The appellant has also challenged the order dated 09.11.2016 whereby the departmental appeal of the appellant was filed.</p>

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

3. Learned Counsel for the appellant argued that in the month of October, 2015 the appellant was badly struck by jaundice and he remained admitted in the hospital resultantly he could not attend to his duties. Further argued that after having been discharged from the hospital the appellant was advised bed rest by the doctor. Further argued that during the absence of appellant disciplinary action was initiated against him and the appellant also submitted reply to the charge sheet wherein the appellant also described the reason of his unavoidable absence. Further argued that the appellant rejoined his duties on 12.01.2017. Further argued that the respondent authority without considering to the stance of the appellant issued the impugned order of dismissal from service. Further argued that the absence of the appellant was not deliberate but due to unavoidable circumstances hence the punishment awarded to the appellant is very harsh and excessive. Learned counsel for the appellant also referred to the documents regarding the medical treatment of the appellant available on file and contended that the original impugned order as well as the impugned appellate order are liable to be set aside.

4. As against that Learned Deputy District Attorney resisted the present service appeal and argued that the departmental appeal of the appellant was time barred hence the present service appeal is not competent. Further argued that the appellant remained absent from duty without any application and permission and was therefore awarded proper punishment after observing all the legal requirements.

5. Arguments heard. File perused.

Handwritten signature/initials in the left margin.

ATTESTED

Handwritten signature and stamp of the attesting officer.

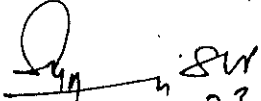
Attesting Officer
Cyber & Information
Service Tribunal,
Peshawar

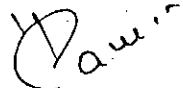
6. It is pertinent to mention that the punishment of dismissal from service was awarded to appellant with retrospective effect, hence the limitation would not run against the impugned order of dismissal from service being void in nature. It is not disputed that the appellant remained absent from duty without having applied for leave and without any permission. Perusal of documents available on file reflects that the impugned order was issued upon the fulfillment of codal formalities and legal requirements. However since the stance of the appellant is that he could not attend to his duties due to severe illness, and the appellant also relies on documents regarding his medical treatment from hospital in order to substantiate his plea of having remained severely ill, this tribunal is of the considered view that extreme punishment of dismissal from service appears to be harsh one. Consequently for the purpose of safe administration of justice the penalty of dismissal from service is modified and converted into forfeiture of approved service^{of} appellant for a period of 2 years as well as stoppage of 2 annual increments for a period for 3 years. Resultantly the appellant is reinstated in service. Absence period as well as intervening period shall be treated as extraordinary leave without pay. The present appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

23.05.2018

Certified to be true
copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar


(SUBHAN SHER)
Chairman


(MUHAMMAD HAMID MUGHAL)
Member

وکالت نامہ

کورٹ فیس

بعدالت سر سید شہزاد علی شاہ
 عنوان: مدیر خان بیتام
 منجانب: محمد حسین
 نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آس مقام

اللہ اللہ کسبہ
 کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ٹائٹ و فیصلہ بر طرف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا محامد صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی دعویٰ اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر ساختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بتایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی قومی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر محامد مقرر کردہ میں کوئی جزو بھلیا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت تاش بیضہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 26/9/18

بمقام:

(Signatures)

محمد حسین
 13101-7884600-3
 محمد خان ولد محمد خان سکینہ صاحبہ
 محمد خان ولد محمد خان سکینہ صاحبہ

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

No. 872-73/ST

Dated 30-4- / 2019


To

1. The Regional Police Officer,
Government of Khyber Pakhtunkhwa,
Hazara Region Abbottabad.
2. District Police Officer,
Government of Khyber Pakhtunkhwa,
Abbottabad.

Subject: - ORDER IN EXECUTION PETITION NO. 301/2018, MR. MUDASSAR KHAN.

I am directed to forward herewith a certified copy of order dated 17.04.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA, SERVICE
TRIBUNAL PESHAWAR CAMP COURT ABBOTTABAD**

Execution Petition No. 301/2018

In

Service Appeal 1223/ 2016

Mudassar Khan son of Jehangir Khan resident of Maira Mandroach,
Nawansher, Tehsil & District Abbottabad.

.....(Appellant)

VERSUS

1. Govt. of Khyber Pakhtunkhwa Peshawar, through Secretary, Home & Tribal Affairs Department Peshawar.
2. Inspector General of Police Khyber Pakhtunkhwa Peshawar.
3. Regional Police Officer, Hazara Region, Abbottabad.
4. District Police Officer, Abbottabad.
5. SDPO Havelian, Abbottabad.

.....Respondents

RESPECTFULLY SHEWETH!

Reply of Objection Petition is submitted as under:-

Para No.1. Pertains to record.

Para No.2. In reply to para No. 2 it is submitted that the petitioner is provisionally reinstated in service on 23.04.2019 on the direction of the Honourable Service Tribunal vide order sheet dated 17.04.2019. The Judgment dated 23.05.2018 passed by the honourable Service Tribunal in the favour of appellant has been challenged by the department before the August Supreme Court of Pakistan vide CPLA No. 301/2018 which has not yet been decided. The outstanding salaries of Petitioner from June, 2018 to April 2019 will be paid after the decision of August Supreme Court of Pakistan. (Copy of order sheet is attached as annexure "A").

Para No. 3. Incorrect.

Para No. 4. Pertains to record.


Para No.5. Pertains to record.

Para No.6. detailed report has been given in Para No. 02 above.

Para No.7. No comments.

PRAYER.

It is therefore, very humbly prayed that in the light of above facts and Circumstances, the Objection Petition may graciously be dismissed with cost throughout.


District Police Officer,
Abbottabad
(Respondents No.4)

17.04.2019

Counsel for the petitioner present. Mr. Muhammad Bilal, DDA alongwith Mr. Shamriaz Khan, ASI for respondents present.

Implementation of judgment of this Tribunal dated 23.05.2018 is being delayed deliberately by the respondents on one pretext or the other. On the last date of hearing they were directed to produce restraint order if any, issued by the august Supreme Court of Pakistan or provide provisional implementation report. Today again provisional implementation order has not been submitted. In these circumstances, the Tribunal is left with no other option but to adopt coercive measures against the respondents. As a first step warrants of attachment of salary of respondent no.3 and 4 may be issued forthwith. They are again directed to produce provisional implementation report on the next date of hearing, positively. Case to come up for further proceedings on 23.05.2019 before S.B at camp court Abbottabad.

521

ORDER

In compliance with the judgment dated 23-05-2018 passed by the honorable Service Tribunal in Service Appeal No.1223-A/2016 filed by Mudassar Khan Ex-Constable No.934 of District Abbottabad whereby major penalty of dismissal from service was modified and converted into major punishment of **forfeiture of approved service for a period of 03 years as well as stoppage of 02 annual increments for a period of 03 years** he is hereby provisionally reinstated in service with immediate effect as the judgment has been challenged before the August Supreme Court of Pakistan vide CPLA No.301/2018 which has not yet been decided. His absence period as well as intervening period will be treated as extraordinary leave without pay.

Mujeeb
District Police Officer,
Abbottabad.

No. 3091-98 /dated 23.5.18

Copy to the:
PO/OASI/SRC for compliance.

ofc

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Mudassar Khan

.....APPELLANT

VERSUS

Govt. of KPK

.....RESPONDENT

IMPLIMENTATION

OBJECTION PETITION ON THE RE-INSTATE ORDER

ISSUED BY THE RESPOONDENT NO3091-92 DATED 23-04-2019

Respectfully Sheweth:-

1. That the Honourable court pleased to re-instate petitioner into service on 23-05-2018.
2. That respondent put deaf ears to re-instatement order despite severally appealed by the petitioner.
3. That due to this humiliating attitude and response of the respondents, petition had filed implementation petition.
4. That during the pendency of instant petitioner Honourable court had to issued compulsory measures like warrant of arrest of respondent, due to their non compliance of Court's order.
5. That respondent 4 in response to warrant of arrest, issued order no. 3091-92 dated 23-04-2019.

6. That according to original order of the Honourable Court of 23-05-2018, respondents all duty and to pay outstanding salaries of June 2018 to April 2019.

7. That previous rights of petitioner are enclosed.

Prayer

So it is humbly prayed that respondents are directed to honour the order dated 23-05-2018 and release outstanding salaries and other benefits from June 2018 to April 2019.

Dated: 10/07/2019

Appellant

Through



Qazi Muhammad Sheraz
Advocate High Court
Abbottabad.