


S.No.	Date of Order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	01.1.2019	<p><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, ESHAWAR</u></p> <p>Appeal No. 586/2015</p> <p>Riaz Hussain ASI Vs. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others.</p> <p><u>Present.</u></p> <p>Syed Mudassir Pirzada, Advocate .. For appellant</p> <p>Mr. Usman Ghani, District Attorney .. For respondents with Ishaq Gul DSP(Legal).</p> <p><u>HAMID FAROOQ DURRANI, CHAIRMAN:-</u></p> <p>At the outset learned counsel for the appellant provided a copy of seniority list issued on 04.07.2017, and stated that the appellant is satisfied with the seriatim contained in the list, however, he has not been extended the benefits of such seniority in the light of letter/order dated 23.01.2017 issued by the Inspector General of Police, Khyber Pakhtunkhwa Peshawar and addressed to the Regional Police Officer, Kohat Region Kohat.</p> <p>2. In the circumstances, where a fresh seniority list stands issued, the appellant may apply departmentally for benefits, if any, accruing to him on the strength of the list. The outcome of his proposed departmental representation would set the course and directions for future proceedings against the respondents including redressal of appellant before this Tribunal, if need be.</p> 

3. Learned District Attorney does not controvert the proposition or the seniority list submitted today.

4. The appeal is, therefore, disposed of in terms of averments made on behalf of the appellant.

Parties are left to bear their respective costs. File be consigned to the record room.


  
Member

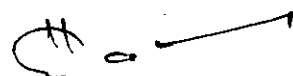
  
Chairman

ANNOUNCED  
01.01.2019

29.06.2018

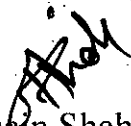
Appellant absent. Learned counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Arif Saleem, ASI for the respondents present. Learned counsel for the appellant seeks adjournment. Being one of the oldest case, last opportunity is granted for arguments. Adjourned. To come up for arguments on 28.08.2018 before D.B.

  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

28.09.2018

Learned counsel for appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for appellant seeks adjournment. Adjourned. To come up for arguments on 12.10.2018 before D.B.

  
(Hussain Shah)  
Member

  
(Muhammad Hamid Mughal)  
Member

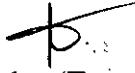
14.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 01.01.2019.


  
Reader

28.02.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 13.04.2018 before the D.B.



Member(Executive)



Member (Judicial)

13.04.2018

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney alongwith Arif Saleem, ASI for the respondents present. The court time is over. Adjourned. To come up for arguments on arguments on 28.06.2018 before the D.B.



Member



Chairman

28.06.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Muhammad Jan, Deputy District Attorney alongwith Arif Saleem Stenographer for the respondents present. Learned Deputy District Attorney stated that the appellant is not interested to pursue his case. In the interest of justice the case is adjourned for tomorrow. To come up for final hearing tomorrow i.e. on 29.06.2018 before D.B.

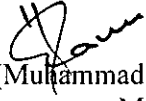
(Muhammad Amin Kundi)  
Member

(Muhammad Hamid Mughal)  
Member

13. 24.07.2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondent present. Counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 27.09.2017 before D.B.


  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

20.11.2017

Learned counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 23.01.2018 before D.B.


  
(Gul Zeb Khan)  
Member (E)

  
(Muhammad Hamid Mughal)  
Member (J)

23.01.2018


Clerk of the counsel for appellant present. Mr. Muhammad Jan, DDA alongwith Arif Saleem, ASI for the respondents present. Counsel for the appellant is not in attendance due to general strike of the bar. To come up for arguments on 28.02.2018 before D.B.

  
Member

  
Chairman

25.04.2017

Counsel for the appellant and Addl: AG for the respondents present. Learned counsel for the appellant submitted amended appeal which is placed on file. No one present on behalf of respondents. Notice shall be issued to the respondents. To come up for written reply on amended appeal on 15.05.2017 before S.B.

  
(Ahmad Hassan)  
Member

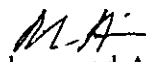
15.05.2017

Clerk to counsel for the appellant and Mr. Bashir Ahmad, Agriculture Officer alongwith Addl. AG for the respondents present. Representative of the respondent-department requested for adjournment. Request accepted. To come up for written reply on amended appeal on 19.06.2017 before S.B.

  
(Ahmad Hassan)  
Member


19.06.2017

Appellant in person present. Mr. Baseer Ahmed, Agriculture Officer alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Representative of respondent-department submitted para-wise comments on amended appeal. To come up for rejoinder and arguments on 24.07.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

21.07.2016

Appellant with counsel and Mr. Arif Saleem, ASI alongwith Additional AG for the respondents present. Written reply not submitted by respondents despite extension of last opportunity. Cost of Rs. 300/- also not paid. Learned Additional AG informed the Tribunal that comments have since been vetted from his office and will be submitted on the next date. Last opportunity further extended subject to payment of further cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comment as well as cost on 08.08.2016 before S.B.

  
MEMBER

08.08.2016

Counsel for the appellant and Mr. Arif Saleem, ASI alongwith Additional AG for respondents present. Para-wise comments on behalf of respondents submitted, copy whereof handed over to learned counsel for the appellant. Cost of Rs. 1000/- also paid and receipt thereof obtained from learned counsel for the appellant. To come up for rejoinder and arguments on 20.10.2016 before D.B.

  
Member

20.10.2016

Counsel for the appellant and Mr. Arif Saleem, ASI alongwith Addl: AG for respondents present. Rejoinder submitted. To come up for arguments on 13.01.2017.

  
(ABDUL LATIF)  
MEMBER

  
(PIR BAKHSI SHAH)  
MEMBER.

10.02.2016

Counsel for the appellant and Mr. Arif Saleem, ASI alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 25.4.2016 before S.B.

  
Chairman

25.4.2016

Agent of counsel for the appellant and Mr. Muhamraad Azam, S.I(Legal) alongwith Addl. AG for the respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity further extended subject to payment of cost of Rs. 300/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments & cost on 21.07.2016 before S.B.

  
Chairman





3

08.06.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as ASI and vide impugned order dated 7.1.2015 junior officials to appellant were promoted regarding which he preferred departmental appeal on 12.1.2015 which was not responded and hence the instant service appeal on 1.6.2015.

That the appellant was entitled to be considered for promotion in preference to his other colleagues as the said colleagues were junior to the appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 31.8.2015 before S.B.

*W.D.*

*71 - 7 - 8*

*71 - 7 - 8*  
Chairman

4

31.08.2015

None present for appellant due to strike of the Bar. Security has not been deposited. To com up for further proceedings/attendance on 12.11.2015 before S.B.

Chairman

12.11.2015

**Appellant Deposited  
Security & Process Fee**  
*[Signature]*



Counsel for the appellant present. Security and process fee have not been deposited. Requested for further time. Last opportunity granted for depositing of security and process fee within a week, where-after notices be issued to the respondents for written reply/comments for 10.2.2016 before S.B.

Chairman

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 586 /2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	01.06.2015	<p>The appeal of Mr. Riaz Hussain resubmitted today by Syed Mudasir Pirzada Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> REGISTRAR</p>
2	5-6-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>8-6-15</u>.</p> <p> CHAIRMAN</p>




The appeal of Mr. Riaz Hussain son of Muhammad Hussain ASI Police department received to-day i.e. on 11.05.2015 is incomplete on the following scores which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellatant.
- 2- Copies of impugned seniority lists dated 31.12.2013, 27.6.2014 and order dated 7.1.2015 mentioned in the heading of the appeal are not attached with the appeal which may be placed on it.
- 3- Copies of Writ Petition and judgment mentioned in para-H of the grounds of appeal are not attached with the appeal which may be placed on it.
- 4- Copy of departmental appeal against the impugned seniority list/order is not attached with the appeal which may be placed on it.
- 5- Copy of order mentioned in para-M of the grounds of appeal (Annexure-D) is not attached with the appeal which may be placed on it.
- 6- Sub-rule-4. of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that in every civil servant to whom the relief claimed may affect, shall also be shown as respondent.
- 7- Documents shown in the index of the appeal at serial no.7 are not attached with the appeal which may be placed on it.
- 8- Five copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 711 /S.T,

Dt. 12/5 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Syed Mudasir Pirzada Adv. Kohat

*Resubmitted*  
*1/6/15*  
*Mudasir*

**BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal 586 / 2015

ASI RIAZ HUSSAIN S/O MUHAMMAD HUSSAIN (PSI OF 2010) DISTRICT POLICE KOHAT

(Appellant)

**VERSUS**

1:-INSPECTOR GENERAL OF KPK POLICE PESHAWAR.

2:-DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT

3:-DISTRICT POLICE OFFICER KOHAT

( Respondents)

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7	S.I list of promotion 03-04-2014, Promotion list of Head Constable dated 03-06-2014, 18-02-2015 & others	D	26-31
	Waklat Nama		

Appellant

Through

Syed Mudasir Pirzada

Advocate 0345-9645854

11/5 / 2015

**BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal 586 / 2015

ASI RIAZ HUSSAIN S/O MUHAMMAD HUSSAIN (PSI OF 2010) DISTRICT POLICE KOHAT .

( Appellant)

VERSUS

A. W. F. PROVINCE  
Service Tribunal  
Diary No. 482  
Dated 11-5-2015

1: Inspector General of Police KPK Peshawar.

2: Deputy Inspector General of Police Kohat

3:- District Police Officer Kohat----- (Respondent )

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED SENIORITY LIST DATED 31-12-2013 & /Endst: No 6256-57/EC DATED 27-06-2014 AND 07-01-2015 IN WHICH RESPONDENT NO 1 TO 3 HAS PREPARED THE LIST "E" FOR THE PURPOSE OF PROMOTION AND PRESENT APPELLANT WERE PLACED,/ CONSIDER JUNIOR THEN OTHERS PASI'S IN THE ANNEXURE LIST AND PROMOTED THE JUNIOR PASI'S ON DATED 07-01-2015 ,DEPARTMENTAL APPEAL WAS PREFERRED ON 12-01-2015 WHICH WAS BEEN REJECTED ORALLY BY RESPONDENT NO 1, AND IS RELUCTANT TO FURNISH WRITTEN ORDER.**

**PRAYER:-**

On accepting of this appeal , the respondent 1 to 3 are directed to correct the seniority list and the appellant may be placed senior then the other PASI's for the end of justice.

**Respectfully Sheweth:-**

With great veneration, the instant appeal is preferred by the appellant on the following facts and grounds.

Filed to-day

Registrar

11/5/15

re-submitted to-day  
and filed:

Registrar 11/6/15

## **Facts:-**

1:- That the appellant In (seniority list dated 31-12-2013 20-06-2014 from serial No 163 & 136 respectively.

2:-That the appellant were also confirmed in the same respective year is mentioned in the seniority list , which stood on 20-02-2010

3:-That when the list "E" was prepared for the purpose of promotion the appellant no 126 were placed junior then others PASI's who were confirmed letter in time from the appellant .

4:-That the appellant felling aggrieved from the seniority list stood on 31-12-2013- & 27-06-2014 & 07-01-2015 and appellant also filed departmental appeal but the appellant were not redressed finding no alternative ,this appeal is filed on the following grounds.

## **GROUND:-**

A:- That the impugned seniority/ promotion list dated 31-12-2013, 27-06-2014 and 07-01-2015 is against the settled law of service promotion and rules( Copy of impugned seniority list is annexed as annexure A)

B:- That the seniority counted from the date of confirmation and all the appellant were confirmed in the year 2010-while the other PASI's were confirmed in the year of 2011.

C:-That for the purpose of promotion inter se seniority of ASI will be prepared from their date of confirmation not from their length of service in police department .

D:-That although all the other juniors PASI's who placed senior then the appellant in the seniority list their service length may be greater then the appellant ,but they were confirmed letter in time from the appellant as ASI.

E:-That the appellant are wrongly placed in list "E" for the purpose of promotion .

F:-That no proper procedure and service rules are follow by the police department as well as departmental promotion committee nor in the promotion of Sub- inspector.

G:-That in the identical situation in other districts like Abbottabad , Bannu etc, the seniority are prepared from the date of confirmation not from their length of service .

H:-That the appellant filed the departmental appeal along with judgment of writ petition no 875-P/2014 in which the hon,able Majesty has directed to respondent No-1 to dispose of representation of the petitioners expeditiously, but no relief are given to the appellant till date, finding no alternative appellant approached this hon,able service tribunal.(Copy of writ, judgment is annexed as annexure B)

I:- That during the representation the respondent No-2 has issued a impugned promotion list which is the violation of service rules (copy of impugned list of respondent No 2 dated 07-01-2015 is annexed as annexure C )

J:-That according to rules 49% of the posts in the rank of ASI's will be PASI's and 51% will be ranker. Distribution will be made according to the allotted quota.

K:-The ASI's which were promoted as Offg: ASI's on the post of PASI's their seniority should be counted from the date on which they were adjusted on their on vacant posts and confirmation may also be made from the date on which they were adjusted as Offg: ASI's on their own vacant post i.e post of ranker according to distribution of posts rules.

L:-That according to police rules a officer which has been promoted as officiating sub inspector SI after the completion of two years officiating period he must confirmed in the rank of SI and will be brought on list F:- but if he is not full filling the criteria for conformation and promotions to next step he must be reverted to substitutive rank of ASI.

M:-That in Kohat Region ,PASIs recruited from 2007 to 2010 have been confirmed from their date of appointment and they have placed in the bottom of seniority list below the rankers confirmed in 2011 .In other regions PASI's were declared senior then ranker in such like matter and they have been promoted as S I's( annexure as annexed D)

N:- That the impugned seniority lists has been prepared on the formula of pick and chose, and the respondent has given false consolation by the office of the respondent No-1 to 3 that soon another DPC meeting is going to be held and the name of appellant shall be consider for promotion on the basis of confirmation till now it transpired to appellant that they have been given false consolation .

O:- That the impugned Seniority Lists and order dated is continuous breach of petitioners right not warranted-by law.

That some other grounds may be adduced during the course of arguments with the kind permission of hon,able tribunal.

**Prayer:-**

On accepting of this appeal , the respondent 1 to 3 are directed to correct the seniority list and the appellant may be placed senior then the other junior promoted PASI's as well as promotion system of Kohat region may kindly be regularized with rules like other region of Khyber PakhtoonKhawa for the end of justice.

Date

11/5/2015

Appellant

Through

Syed Mudasir Pirzada

Advocate 0345-9645854

## Interim Relief:-

That the documentation are prepared by the respondent /department for the purpose of promotion and their further process may be suspended till the decision of instant service appeal.

## CERTIFICATE:-

Certified that no such like appeal has earlier been filed in this Hon,able Service tribunal as per instruction of my client.

## LIST OF BOOKS

- 1:-Constitution of Pakistan,1973.
- 2:-Case law according to need

*Mud*  
*Advocate*



BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal \_\_\_\_\_ 2015

**AFFIDAVIT**

I, Syed Mudasir Pirzada advocate, As per instruction of my client do here by solemnly affirm and declare that all the contents of accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Tribunal.

*Riaz*

ADVOCATES

*Mud*



**BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal \_\_\_\_\_ 2015

ASI RIAZ HUSSAIN S/O MUHAMMAD HUSSAIN (PSI OF 2010) DISTRICT POLICE KOHAT

(Appellant)

**VERSUS**

Inspector General of Police KPK Peshawar.

Deputy Inspector General of Police Kohat

District Police Officer Kohat

(Respondent)

**ADDRESSES OF THE PARTIES**

**APPELLANT:-**

ASI RIAZ HUSSAIN S/O MUHAMMAD HUSSAIN (PSI OF 2010) DISTRICT POLICE KOHAT

**RESPONDENTS:-**

1:-Inspector General of Police KHYBER PAKHTOON KHWA Peshawar.

2:-Deputy Inspector General of Police Kohat Region Kohat

3:-District Police Officer Kohat

Appellant

Through

Syed Mudasir Pirzada

Advocate 0345-9645854

11/5/2015

Ammed A

I  
Ammed A

POLICE DEPARTMENT

SENIORITY LIST AND FULL SERVICE PARTICULARS OF OFFG: SUB-INSPECTORS/  
ASST: SUB-INSPECTORS ON PROMOTION LIST "E" OF KOHAT REGION, KOHAT.

KOHAT REGION.

Subject:- SENIORITY LIST.

The Seniority list of the following Offg: Sub-Inspectors/Asstt: Sub" Inspectors on promotion list "E" as it stood 31.12.2013.

S.No	Name and Number	Date of Birth	Date of Enlist:	Date of confirmation as ASI	Date of Entry into list "E"	Date of promotion as Offg" SI..	Place of Posting	Remarks
1	2	3	4	5	6	7	8	9
1.	Offg: SI. Muhammad Idres-9/K	10.12.1958	10.02.1979	-	07.04.1993	02.05.1994	Traffic Pesh:	
2.	Offg: SI. Ali Hassan -	06.03.1965	12.12.1988	01.07.2003	01.07.2003	28.01.1998	Kohat Distt:	Adhoc Insp:
3.	Offg: SI. Jehangir Khan-44/K	08.03.1957	11.02.1975	04.06.1999	04.06.1999	20.09.2003	Kohat Distt:	
4.	Offg: SI. Wali Dad-60/K	01.01.1953	01.01.1972	17.03.2001	20.08.2002	01.09.2004	CID NWFP	Promoted as a Insp: on adhoc basis
5.	Offg: SI. Zeenat Hussain No.47/K	01.04.1966	12.12.1988	01.07.2003	01.07.2003	17.11.2000	Kohat Distt:	
6.	Offg: SI Rauf Ullah 63/K	13.02.1956	10.07.1974	01.01.2002	20.08.2004	30.06.2008	Inv: Kohat	
7.	Offg: SI Mir Shah Jehan-14/K	04.04.1957	01.11.1977	12.04.2004	30.12.2004	21.06.2007	Inv: Karak	
8.	Offg: SI Saif-ur-Rehman-15/K	06.06.1954	24.06.1975	12.04.2004	30.12.2004	21.06.2007	Inv: Kohat	
9.	Offg: SI Bakhtiar Khan-2/K	02.10.1956	11.06.1975	13.04.2004	01.01.2005	21.06.2007	Inv: Hangu	
10.	Offg: SI Shukat Saleem-4/K	05.02.1957	05.11.1975	13.04.2004	01.01.2005	21.06.2007	Kohat Distt:	
11.	Offg: SI Peshawar Khan-5/K	05.03.1956	30.11.1974	13.04.2004	01.01.2005	21.06.2007	Kohat Distt:	
12.	Offg: SI Amir Khan -7/K	12.01.1954	12.08.1975	13.04.2004	01.01.2005	21.06.2007	Kohat Distt:	
13.	Offg: SI Muhammad Saddique 16/K	20.10.1955	20.10.1975	04.09.2004	01.01.2005	21.06.2007	Karak Distt:	
14.	Offg: SI Anwar Din -19/K	03.01.1954	01.08.1974	10.11.2004	01.01.2005	21.06.2007	ACE Pesh:	
15.	Offg: SI Aqleem Khan-27/K	26.02.1957	31.11.1975	31.05.2005	01.01.2005	21.06.2007	CID NWFP	
16.	Offg: SI Sher Bahadar - 7/K	20.06.1956	01.06.1975	30.09.2005	01.06.2005	21.06.2007	Karak Distt:	
17.	Offg: SI Muhammad Zaman-78/K	01.02.1957	04.11.1975	30.09.2005	01.10.2005	21.06.2007	Inv: Karak	
18.	Offg: SI Amal Khan -79/K	12.10.1956	22.11.1975	03.07.2006	01.10.2005	21.06.2007	Karak Distt:	
19.	Offg: SI Naqeebullah Marwat -	22.01.1956	04.08.1975	16.02.2007	04.07.2006	21.06.2007	Karak Distt:	
20.	Offg: SI Mohibullah	09.02.1959	09.06.1977	16.02.2007	17.02.2007	21.06.2007	Inv: Hangu	
21.	Offg: SI Zakeem Khan-84/K	12.05.1957	14.06.1976	16.02.2007	17.02.2007	21.06.2007	Karak Distt:	
22.	Offg: SI Faizullah Khan-85/K	15.11.1957	15.11.1975	16.02.2007	17.02.2007	17.10.2007	Hangu Distt:	
						07.04.2008	Traffic Pesh:	

23.	ASI Bostan Ghani	02.04.1957	15.11.1975	16.02.2007	17.02.2007			
24.	Offg: SI. Muhammad Raees-86/K	20.06.1956	20.11.1975	16.02.2007	17.02.2007		Karak Distt:	
25.	Offg: SI Muhammad Yousaf-87/K	08.12.1954	10.04.1976	16.02.2007	17.02.2007	30.06.2008	Inv: Hangu	
26.	Offg: SI Mir Ajab -89/K	05.10.1953	05.08.1975	16.02.2007	17.02.2007	07.04.2008	Karak Distt:	
27.	Offg: SI Zafarullah -91/K	12.02.1958	17.12.1976	16.02.2007	17.02.2007	07.04.2008	Karak Distt:	
28.	Offg: SI. Muhammad-Nawaz -78/K	01.10.1957	03.08.1975	16.02.2007	17.02.2007	07.04.2008	Inv: Kohat	
29.	Offg: SI Muhammad-Rehman -93/K	10.02.1959	08.03.1978	16.02.2007	17.02.2007	30.06.2008	KBI Kohat	
30.	Offg: SI Munawar Khan -15/K	05.06.1956	01.06.1974	17.02.2007	17.02.2007	07.04.2008	Inv: Karak	
31.	Offg: SI Ali Ahmed-No.108/K	10.01.1970	10.08.1991	24.11.2007	24.11.2007	07.04.2008	Inv: Kohat	
32.	Offg: SI. Zafar Iqbal	08.02.1965	13.08.1991	24.11.2007	24.11.2007	17.08.2011	Kohat District	
33.	Offg: SI. Farid Khan	11.04.1967	12.08.1991	24.11.2007	24.11.2007	17.08.2011	Hangu Distt:	
34.	Offg: SI. Wilayat Khan -51/K	01.08.1957	01.08.1975	10.12.2007	10.12.2007	17.08.2011	Hangu Distt:	
35.	Offg: SI. Naqeeb Ullah No. /K	03.03.1956	08.12.1975	10.12.2007	10.12.2007	07.04.2008	Karak Distt:	
36.	Offg: SI. Awal Rehman - No.	04.02.1956	02.12.1974	10.12.2007	10.12.2007	07.04.2008	Inv: Hangu	
37.	Offg: SI. Mir Atlas 12/K	10.01.1959	21.09.1977	10.12.2007	10.12.2007	07.04.2008	Karak Distt:	
38.	Offg: SI. Muhammad-Yousaf -96/K	06.04.1957	16.10.1975	10.12.2007	10.12.2007	07.04.2008	Inv: Karak	
39.	Offg: SI. Wali Sher -97/K	01.03.1959	18.05.1977	10.12.2007	10.12.2007	07.04.2008	Inv: Karak	
40.	Offg: SI Gul Jamal -98/K	24.10.1955	29.10.1975	10.12.2007	10.12.2007	07.04.2008	KBI, Kohat	
41.	Offg: SI Abdul Latif No.18/K	06.01.1957	09.05.1977	10.12.2007	10.12.2007	07.04.2008	Hangu Distt:	
42.	Offg: SI Munwar Khan -99/K	01.02.1958	07.10.1977	10.12.2007	10.12.2007	07.04.2008	Inv: Karak	
43.	Offg: SI. Muhammad Nazir -100/K	01.06.1959	23.08.1980	10.12.2007	10.12.2007	07.04.2008	Kohat Distt:	
44.	Offg: SI Amirullah No.104/K	08.08.1957	09.08.1975	03.04.2008	05.04.2008	07.04.2008	Inv: Kohat	
45.	Offg: SI. Rast Ali No.105/K	01.10.1956	06.06.1977	03.04.2008	05.04.2008	28.07.2009	Hangu Distt:	
46.	Offg: SI Muhammad Tariq No.106/K	07.01.1966	23.06.1986	03.04.2008	05.04.2008	30.06.2008	Karak Distt:	
47.	Offg: SI. Muhammad Ghani No.108/K	15.09.1957	22.06.1976	03.04.2008	05.04.2008	30.06.2008	Kohat Distt:	
48.	Offg: SI. Muhammad Sakhawat No.109/K	02.08.1957	01.04.1977	03.04.2008	05.04.2008	28.07.2009	Karak Distt:	
49.	Offg: SI. Gul Faraz No.110/K	05.03.1959	20.05.1977	03.04.2008	05.04.2008	28.07.2009	Hangu Distt:	
50.	Offg: SI. Ghulam Rasool No.662	01.06.1959	03.06.1979	30.06.2008	30.06.2008	28.07.2009	Karak Distt:	On loan from Hangu Distt:
51.	Offg: SI. Sami-Ullah No.111/K	01.03.1958	17.08.1976	03.04.2008	05.04.2008	28.07.2009	Hangu Distt:	
52.	Offg: SI. Muhammad Hashim 112/K	05.05.1959	30.09.1978	03.04.2008	05.04.2008	28.07.2009	Inv: Kohat	
53.	Offg: SI. Mumtaz Khan No.113/K	06.10.1959	09.11.1980	03.04.2008	05.04.2008	28.07.2009	Hangu Distt:	
54.	Offg: SI. Nimatullah No.95/K	02.12.1952	15.12.1977	29.08.2009	29.08.2009	28.07.2009	Inv: Hangu	
55.	Offg: SI. Nasruallah No.97/K	10.04.1954	20.03.1978	29.08.2009	29.08.2009	02.12.2009	Karak Distt:	
56.	Offg: SI Miftah ud Din 141/K	10.11.1960	26.06.1979	29.08.2009	29.08.2009	27.05.2013	Kohat Distt:	
57.	Offg: SI. Bakhtiar Khan	03.04.1957	13.12.1976	01.04.1996	01.09.2004	02.12.2009	Kohat District	
58.	Offg: SI. Sattar-Khan No.99/K	05.02.1959	13.02.1978	29.08.2009	29.08.2009	02.12.2009	Karak Distt:	

59.	Offg: SI. Asal Khan No.101/K	10.10.1960	18.06.1979	29.08.2009	29.08.2009	02.12.2009	Karak Distt:	
60.	Offg: SI.. Gul Razim No.102/K	05.05.1959	05.05.1977	29.08.2009	29.08.2009	02.12.2009	Inv: Hangu	
61.	Offg: SI. Zainullah No.103/K	20.04.1957	01.08.1975	29.08.2009	29.08.2009	02.12.2009	Hangu Distt:	
62.	Offg: SI. Noor Jehan No.	12.09.1958	13.01.1979	29.08.2009	29.08.2009	18.08.2010	Hangu Distt:	
63.	Offg: SI. Nasrullah No.105/K	04.05.1960	21.10.1981	29.08.2009	29.08.2009	02.12.2009	Kohat Distt:	
64.	Offg: SI. Muhammad Iqbal No.106	01.01.1960	01.03.1979	29.08.2009	29.08.2009	02.12.2009	Karak Distt:	
65.	Offg: SI Ghulam Murtaza No.69/K	18.02.1976	28.12.2006	28.12.2006	28.06.2010	18.08.2010	Kohat District	
66.	Offg: SI Nazar Hussain No.70/K	10.01.1975	28.12.2006	28.12.2006	28.06.2010	18.08.2010	Kohat District	
67.	Offg: SI Shoukat Hayat No.13/K	20.12.1981	04.03.2006	04.03.2006	28.06.2010	18.08.2010	Kohat District	
68.	Offg: SI Muhammad Irfan 87/K	01.08.1970	19.02.1992			1997	Karak District	Received on transfer from Sindh Police(Karachi) on 03.06.2011
69.	Offg: SI. Amiid Hussain	04.04.1975	28.11.1994	18.08.2010	18.08.2010	17.08.2011	PTC Hangu	
70.	Offg: SI. Ayatullah Khan No.11/K	15.08.1983	11.03.2001	27.08.2010	27.08.2010	17.08.2011	Kohat District.	
71.	Offg: SI. Jan Ali 126/k		09.10.1983	17.05.2011	17.05.2011	13.10.2011	Kohat District.	
72.	Offg: SI Sardar Khan 127/k	05.02.1962	27.12.1980	17.05.2011	17.05.2011	13.10.2011	Kohat District.	
73.	Offg: SI Gul Rehman 128/k	01.04.1957	10.07.1977	17.05.2011	17.05.2011	13.10.2011	Inv: Karak	
74.	Offg: SI Gul Janan 129/k	03.03.1961	13.12.1980	17.05.2011	17.05.2011	13.10.2011	Kohat District.	
75.	Offg: SI Muhammad Nazir 130/k	18.03.1964	01.06.1982	17.05.2011	17.05.2011	13.10.2011	Kohat District.	
76.	Offg: SI Nazir Azam 131/k	07.06.1955	01.06.1980	17.05.2011	17.05.2011	13.10.2011	Kohat District.	
77.	Offg: SI Zaibullah 132/k	14.04.1960	08.09.1981	17.05.2011	17.05.2011	13.10.2011	Hangu Inv:	
78.	Offg: SI Muhammad Kamal 133/k	10.08.1956	01.08.1975	17.05.2011	17.05.2011	13.10.2011	Karak District	
79.	Offg: SI Latifullah 134/k	10.10.1962	28.11.1981	17.05.2011	17.05.2011	13.10.2011	Inv: Kohat	
80.	Offg: SI Nasrullah Khan 135/k	03.01.1960	01.06.1980	17.05.2011	17.05.2011	13.10.2011	Hangu District	
81.	Offg: SI Zulfat Ali Shah 136/k	14.03.1958	26.12.1977	17.05.2011	17.05.2011	04.06.2012	Kohat Inv:	
82.	Offg: SI Faizullah 137/k	10.08.1964	20.09.1982	17.05.2011	17.05.2011	04.06.2012	Karak District	
83.	Offg: SI Azmat Ali	01.04.1978	25.02.1998			06.08.2012	Hangu District	Received on transfer from Balochistan Police on 06.08.2012
84.	Offg: SI Aleem Khan 138/k	25.02.1957	08.12.1975	17.05.2011	17.05.2011	15.08.2012	Karak District	
85.	Offg: SI Nek Nawaz 139/k	20.06.1955	11.06.1980	17.05.2011	17.05.2011	15.08.2012	Kohat District.	
86.	Offg: SI Add Nawaz 140/k	08.05.1958	01.12.1977	17.05.2011	17.05.2011	15.08.2012	Kohat District.	
87.	Offg: SI Sakhi-ur Rehman 6/k	04.03.1960	11.06.1980	13.10.2011	13.10.2011	15.08.2012	Kohat District.	
88.	SI Bashir Ahmed Niazi 12/k	01.04.1960	06.07.1978	13.10.2011	13.10.2011		Karak District	
89.	Offg: SI Naeemullah	01.02.1961	12.09.1982	13.10.2011	13.10.2011	27.05.2013	Karak District	
90.	Offg: SI Abdul Saeed 70/k	01.02.1967	04.07.1978	13.10.2011	13.10.2011	27.05.2013	Karak District	
91.	Offg: SI Zard Ali 72/k	01.02.1959	16.04.1977	13.10.2011	13.10.2011	27.05.2013	Hangu District	
92.	Offg: SI Amir sultan 76/k	25.05.1964	18.09.1982	13.10.2011	13.10.2011	19.12.2013	Karak District	

93.	Offg: SI Muhammad Bashir 85 /k	05.02.1959	21.10.1982	13.10.2011	13.10.2011	19.12.2013	Karak District
94.	Offg: SI Hakim Khan 100/k	05.01.1969	29.06.1989	13.10.2011	13.10.2011	19.12.2013	Karak District
95.	Offg: SI Muzzafar Khan 119/k	01.01.1957	09.12.1978	13.10.2011	13.10.2011	19.12.2013	Hangu District
96.	Offg: SI Eid Nawaz 141/k	10.02.1969	15.13.1987	13.10.2011	13.10.2011	19.12.2013	Karak District
97.	ASI Gul Rehman 142/k	15.10.1960	20.03.181	13.10.2011	13.10.2011	19.12.2013	Karak District
98.	Offg: SI Muhammad Ayub 143/k	05.01.1962	05.04.1982	13.10.2011	13.10.2011	19.12.2013	Karak District
99.	Offg: SI Khan Ullah 144/k	25.01.1960	04.10.1980	13.10.2011	13.10.2011	19.12.2013	Karak District
100.	ASI Abdur Rashid 145/k	19.11.1959	11.10.1980	13.10.2011	13.10.2011	19.12.2013	Karak District
101.	ASI Akbar Shah 146/k	20.03.1963	15.01.1981	13.10.2011	13.10.2011		Karak District
102.	ASI Anwar Badshah 147/k	10.02.1966	29.03.1983	13.10.2011	13.10.2011		Inv: Kohat
103.	ASI Hajji Rehman 148/k	20.04.1969	22.08.1988	13.10.2011	13.10.2011		Kohat District
104.	ASI Abdur Rehman 149/k	20.03.1963	17.08.1982	13.10.2011	13.10.2011		Karak District
105.	ASI Shah Wali 150/k	01.08.1960	01.11.1978	13.10.2011	13.10.2011		Hangu District
106.	ASI Abdul Nawab 151/k	03.03.1960	26.08.1988	13.10.2011	13.10.2011		Hangu District
107.	ASI Muhammad Hamayun 152/k	01.06.1960	18.12.1980	13.10.2011	13.10.2011		Hangu District
108.	ASI Sherin Jan 153/k	06.01.1955	08.09.1979	13.10.2011	13.10.2011		Hangu District
109.	ASI Dost Muhammad 154/k	08.12.1969	01.10.1989	13.10.2011	13.10.2011		Karak District
110.	ASI Sakhi Marjan 155/k	29.11.1956	29.11.1975	13.10.2011	13.10.2011		Karak District
111.	ASI Kirman Ali 156/k	11.03.1963	02.01.1983	13.10.2011	13.10.2011		Karak District
112.	ASI Gul Shahmeen 157/k	18.12.1961	24.07.1984	13.10.2011	13.10.2011		Kohat District
113.	ASI Amanullah 158/k	22.04.1965	02.10.1985	13.10.2011	13.10.2011		Karak District
114.	ASI Muhammad Rokhan 159/k	01.03.1964	21.03.1987	13.10.2011	13.10.2011		Hangu District
115.	ASI Shameen Khan 160/k	03.02.1961	1986	13.10.2011	13.10.2011		Inv: Karak
116.	ASI Mehboobullah 161/k	28.10.1960	28.10.1978	13.10.2011	13.10.2011		Karak District
117.	ASI Razi Gul 7/k	04.04.1968	21.06.1988	13.10.2011	13.10.2011		Hangu District
118.	ASI Gul Shah Baraz 162/k	12.07.1964	21.12.1986	13.10.2011	13.10.2011		Kohat District
119.	ASI Hassan Faqir 163/k	20.10.1965	08.12.1983	13.10.2011	13.10.2011		Hangu District
120.	ASI Amir Zaman 164/k	01.02.1969	23.09.1987	13.10.2011	13.10.2011		PTC Hangu.
121.	ASI Ishfaq Khan 165/k	18.03.1971	04.04.1990	13.10.2011	13.10.2011		Karak District.
122.	ASI Habib-ur-Rehman 166/k	03.07.1965	20.12.1982	13.10.2011	13.10.2011		Hangu District
123.	ASI Azhar Ali 167/k	10.10.1964	21.12.1986	13.10.2011	13.10.2011		Hangu District
124.	ASI Tahir Nawaz 168/k	01.01.1972	01.01.1994	13.10.2011	13.10.2011		Hangu District
125.	ASI Muhammad Rahim 169/k	05.05.1976	16.11.1999	13.10.2011	13.10.2011		Hangu District
126.	ASI Javid Hussain 170/k	04.03.1966	21.09.1988	13.10.2011	13.10.2011		Kohat District.
127.	ASI Mujtaba Ali 171/k	04.01.1970	21.06.1988	13.10.2011	13.10.2011		Kohat District.
128.	ASI Nadar Khan 172/k	05.02.1966	22.03.1986	13.10.2011	13.10.2011		Kohat District.
129.	ASI Shah Duran 173/k	20.02.1967	23.09.1987	13.10.2011	13.10.2011		Kohat District.

130.	ASI Iqrar Ali 174/k	17.07.1968	22.06.1987	13.10.2011	13.10.2011		
131.	ASI Rasool Muhammad 175/k	10.02.1965	18.06.1983	13.10.2011	13.10.2011		Kohat District.
132.	ASI Muhammad Azam 176/k	03.02.1973	15.01.1995	13.10.2011	13.10.2011		Karak District
133.	ASI Nazar Abbas 177/k	08.03.1975	20.04.1993	13.10.2011	13.10.2011		Kohat District.
134.	ASI Muhammad Anwar Shah 178/k	03.07.1969	31.03.1988	13.10.2011	13.10.2011		Kohat District.
135.	ASI Rizwanullah 179/k	01.08.1969	31.03.1988	13.10.2011	13.10.2011		Kohat District.
136.	ASI Muhammad Jamal 180/k	08.04.1967	24.12.1986	13.10.2011	13.10.2011		Hangu District
137.	ASI Malik Jan 181/k	18.02.1965	06.03.1984	13.10.2011	13.10.2011		Hangu District
138.	ASI Yousaf Hayal 182/k	22.03.1967	27.09.1988	13.10.2011	13.10.2011		Karak District
139.	ASI Shakeef Ahmed 183/k	02.02.1965	19.03.1987	13.10.2011	13.10.2011		Kohat District.
140.	ASI Zardad Khan 184/k	18.02.1964	01.10.1987	13.10.2011	13.10.2011		Kohat District.
141.	ASI Ahmed Hussain 185/k	08.05.1969	12.12.1988	13.10.2011	13.10.2011		Inv: Kohat
142.	ASI Bahadar Nawaz 186/k	04.02.1967	26.12.1987	13.10.2011	13.10.2011		Hangu District.
143.	ASI Muzafar Khan 187/k	12.04.1961	23.12.1979	13.10.2011	13.10.2011		Kohat District.
144.	ASI Awal Zaman 188/k	24.04.1969	27.09.1988	13.10.2011	13.10.2011		Karak District
145.	ASI Islam-ud-Din 189/k	01.08.1964	01.12.1983	13.10.2011	13.10.2011		Karak District
146.	ASI Shafi Muhammad 190/k	07.05.1963	01.01.1985	13.10.2011	13.10.2011		Hangu District
147.	ASI Muhammad Nawaz 191/k	21.03.1967	31.03.1988	13.10.2011	13.10.2011		Karak District
148.	ASI Israr Ali 192/k	10.02.1966	10.10.1984	13.10.2011	13.10.2011		Kohat District.
149.	ASI Abdul Qayyum 193/k	23.07.1962	22.03.1986	13.10.2011	13.10.2011		Kohat District.
150.	ASI Fazal Badshah 194/k	06.01.1965	15.12.1986	13.10.2011	13.10.2011		PTC Hangu.
151.	ASI Ahmed Janan 195/k	01.01.1965	15.12.1986	13.10.2011	13.10.2011		Karak District
152.	ASI Shadiullah 196/k	06.09.1971	30.01.1991	13.10.2011	13.10.2011		Karak District
153.	ASI Sakhi ur Rehman	04.03.1982	19.09.2007	19.09.2007	07.01.2012		Kohat District.
154.	ASI Manzoor ur Rehman	19.04.1973	23.12.1991	05.08.2012	05.08.2012		Kohat District
155.	ASI Zeshan Ahmed No.89/K	17.04.1979	12.02.2009	12.02.2009	15.08.2012		Inv: Kohat
156.	ASI Fazal Mehmood No.90/K	12.12.1978	12.02.2009	12.02.2009	15.08.2012		Hangu District
157.	ASI Abbas Ali No.91/K	20.01.1985	12.02.2009	12.02.2009	15.08.2012		Hangu District
158.	ASI Mujahid Hussain No.93/K	15.03.1988	28.02.2009	28.02.2009	15.08.2012		Hangu District
159.	ASI Sahib-ur-Rehman	21.04.1968	22.06.1986	20.01.2013	20.01.2013		Hangu District
160.	ASI Muhammad Tariq No. 58/K	03.03.1986	21.10.2006	21.10.2006	16.07.2013		PTC Hangu
161.	ASI Imran Khan No.92/K	23.01.1986	28.02.2009	28.02.2009	16.07.2013		Karak District
162.	ASI Abdul Hameed No. 11/K	13.08.1984	18.06.2009	18.06.2009	16.07.2013		Kohat District
163.	ASI Riaz Hussain No. 04/K	12.01.1979	20.02.2010	20.02.2010	16.07.2013		Kohat District

164.	ASI Noor Muhammad No. 05/K	20.12.1981	01.03.2010	01.03.2010	06.01.2014		Kohat District
165.	ASI Jamshaid Ali No. 14/K	12.06.1980	20.02.2010	20.02.2010	16.07.2013		Hangu District
166.	ASI Saeed Ur Rehman 43/K	20.01.1983	20.02.2010	20.02.2010	16.07.2013		Karak District
167.	ASI Nasir Abbas Noori No. 16/K	06.02.1971	17.02.2010	17.02.2010	16.07.2013		Kohat District
168.	ASI Roman Ullah No. 112/K	06.03.1970	23.07.2010	23.07.2010	26.07.2013		Kohat District
169.	ASI Muhammad Ayaz No. 115/K	18.07.1987	23.07.2010	23.07.2010	06.01.2014		Kohat District
170.	ASI Rahat Gul No. 199/K	25.02.1968	10.08.1991	23.08.2013	03.01.2014		Kohat District

**OFFICE OF THE DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION, KOHAT.**

NO: 249-60 /EC, Dated Kohat the 20 / 01 /2014.



Copy of above is forwarded to the:-

1. Provincial Police Officer, K.P.K, Peshawar.
2. Addl: IGP, Special Br: K.P.K, Peshawar.
3. Dy: Inspector General of Police Traffic K.P.K, Peshawar
4. AIG/CID K.P.K, Peshawar
5. Commandant, PTC/Hangu.
6. District Police Officers, Kohat, Karak and Hangu.
7. Superintendent of Police Investigation, Kohat.
8. Supdt: of Police Investigation, Karak.
9. Supdt: of Police Investigation, Hangu.
10. Asstt: Secret Range office, Kohat.

*SRE*  
*Inform all concerned.*

*DPIC KOHAT*

The Police officers (concerned) may be informed of their seniority position. If they are not satisfied with their Seniority assigned to them, they should submit their representation within a period of one month from the date of receipt of this communication, failing which no representation will be entertained.

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



SENIORITY LIST AND FULL SERVICE PARTICULARS OF OFFG: SUB-INSPECTORS/  
ASST: SUB-INSPECTORS ON PROMOTION LIST "E" OF KOHAT REGION, KOHAT AS IT STOOD ON 20.06.2014.

Subject:- SENIORITY LIST.

In continuation to this office Endst: No. 6256-57/EC; dated 27.06.2014.

Revised Seniority list of the following Offg: Sub-Inspectors/Asstt: Sub Inspectors on promotion list "E" is as it stood 20.06.2014 is hereby published for the information of all concerned.

S.N	Name and Number	Date of Birth	Date of Enlist:	Date of confirmation as ASI	Date of Entry into list "E"	Date of promotion as Offg" SI	Place of Posting	Remarks
1	2	3	4	5	6	7	8	9
1.	Offg: SI. Muhammad Idres-9/K	10.12.1958	10.02.1979	-	07.04.1993	02.05.1994	Traffic Pesh:	
2.	Offg: SI. Ali Hassan -	06.03.1965	12.12.1988	01.07.2003	01.07.2003	28.01.1998	ACE	Adhoc Insp:
3.	Offg: SI Rauf Ullah 63/K	13.02.1956	10.07.1974	01.01.2002	20.08.2004	30.06.2008	Inv: Kohat	
4.	Offg: SI Mir Shah Jehan-14/K	04.04.1957	01.11.1977	12.04.2004	30.12.2004	21.06.2007	Inv: Karak	
5.	Offg: SI Shoukat Saleem-4/K	05.02.1957	05.11.1975	13.04.2004	01.01.2005	21.06.2007	Kohat Distt:	
6.	Offg: SI Muhammad Saddique 16/K	20.10.1955	20.10.1975	04.09.2004	01.01.2005	21.06.2007	ACE Pesh:	
7.	Offg: SI Anwar Din -19/K	03.01.1954	01.08.1974	10.11.2004	01.01.2005	21.06.2007	CTD KPK	
8.	Offg: SI Aqleem Khan-27/K	26.02.1957	31.11.1975	31.05.2005	01.06.2005	21.06.2007	Karak Distt:	
9.	Offg: SI Muhammad Zaman-78/K	01.02.1957	04.11.1975	30.09.2005	01.10.2005	21.06.2007	Karak Distt:	
10.	Offg: SI Amal Khan -79/K	12.10.1956	22.11.1975	03.07.2006	04.07.2006	21.06.2007	Karak Distt:	
11.	Offg: SI Naqeebullah Marwat -	22.01.1956	04.08.1975	16.02.2007	17.02.2007	21.06.2007	Swat Distt:	
12.	ASI Mubib Ullah	09.02.1959	09.06.1977	16.02.2007	17.02.2007	21.06.2007	Karak District	Reduction in rank
13.	Offg: SI Zakeem Khan-84/K	12.05.1957	14.06.1976	16.02.2007	17.02.2007	17.10.2007	Hangu Distt:	
14.	Offg: SI Faizullah Khan -85/K	15.11.1957	15.11.1975	16.02.2007	17.02.2007	07.04.2008	Kohat Distt:	
15.	ASI Bostan Ghani	02.04.1957	15.11.1975	16.02.2007	17.02.2007	-	Karak Distt:	
16.	Offg: SI Muhammad Raees-86/K	20.06.1956	20.11.1975	16.02.2007	17.02.2007	30.06.2008	Inv: Hangu	
17.	Offg: SI Muhammad Yousaf-87/K	08.12.1954	10.04.1976	16.02.2007	17.02.2007	07.04.2008	Karak Distt:	
18.	Offg: SI Muhammad Rehman -93/K	10.02.1959	08.03.1978	16.02.2007	17.02.2007	07.04.2008	Inv: Karak	
19.	Offg: SI Munawar Khan -15/R	05.06.1956	01.06.1974	17.02.2007	17.02.2007	07.04.2008	Inv: Kohat	
20.	Offg: SI Ali Ahmed No.108/K	10.01.1970	10.08.1991	24.11.2007	24.11.2007	17.08.2011	Kohat District	
21.	Offg: SI. Zafar Iqbal	08.02.1965	13.08.1991	24.11.2007	24.11.2007	17.08.2011	Traffic KPK	
22.	Offg: SI Naqeeb Ullah No. /K	03.03.1956	08.12.1975	10.12.2007	10.12.2007	07.04.2008	Inv: Hangu	

23.	Offg: SI Awal Rehman - No.	04.02.1956	02.12.1974	10.12.2007	10.12.2007	07.04.2008	Karak Distt:
24.	Offg: SI Mir Atlas 12/K	10.01.1959	21.09.1977	10.12.2007	10.12.2007	07.04.2008	CTD KPK
25.	Offg: SI Muhammad Yousaf -96/K	06.04.1957	16.10.1975	10.12.2007	10.12.2007	07.04.2008	Inv: Karak
26.	Offg: SI Wali Sher -97/K	01.03.1959	18.05.1977	10.12.2007	10.12.2007	07.04.2008	KBI, Kohat
27.	Offg: SI Abdul Latif No.18/K	06.01.1957	09.05.1977	10.12.2007	10.12.2007	07.04.2008	CTD KPK
28.	Offg: SI Munawar Khan -99/K	01.02.1958	07.10.1977	10.12.2007	10.12.2007	07.04.2008	CTD KPK
29.	Offg: SI Muhammad Nazir -100/K	01.06.1959	23.08.1980	10.12.2007	10.12.2007	07.04.2008	Inv: Karak
30.	Offg: SI Amir Ullah No.104/K	08.08.1957	09.08.1975	03.04.2008	05.04.2008	28.07.2009	Hangu Distt:
31.	Offg: SI Rast Ali No.105/K	01.10.1956	06.06.1977	03.04.2008	05.04.2008	30.06.2008	Karak Distt:
32.	Offg: SI Muhammad Ghani No.108/K	15.09.1957	22.06.1976	03.04.2008	05.04.2008	28.07.2009	Karak Distt:
33.	Offg: SI Muhammad Sakhawat No.109/K	02.08.1957	01.04.1977	03.04.2008	05.04.2008	28.07.2009	CTD KPK
34.	Offg: SI Gul Faraz No.110/K	05.03.1959	20.05.1977	03.04.2008	05.04.2008	28.07.2009	CTD KPK
35.	Offg: SI Ghulam Rasool No.111/K	01.06.1959	03.06.1979	30.06.2008	30.06.2008	28.07.2009	CTD KPK
36.	Offg: SI Sami Ullah No.112/K	01.03.1958	17.08.1976	03.04.2008	05.04.2008	28.07.2009	CTD KPK
37.	Offg: SI Muhammad Hasnain 112/K	05.05.1959	30.09.1978	03.04.2008	05.04.2008	28.07.2009	CTD KPK
38.	Offg: SI Nimatullah No.95/K	02.12.19	15.12.1977	29.08.2009	29.08.2009	02.12.2009	Karak Distt:
39.	Offg: SI Muftah ud Din 141/K	10.11.1960	26.06.1979	29.08.2009	29.08.2009	27.05.2013	CTD KPK
40.	Offg: SI Bakhtiar Khan	03.04.1957	13.12.1976	01.04.1996	01.09.2004	02.12.2009	CTD KPK
41.	Offg: SI Sattar Khan No.99/K	05.02.1959	13.02.1978	29.08.2009	29.08.2009	02.12.2009	Karak Distt:
42.	Offg: SI Asal Khan No.101/K	10.10.1960	18.06.1979	29.08.2009	29.08.2009	02.12.2009	Karak Distt:
43.	Offg: SI Gul Razim No.102/K	05.05.1959	05.05.1977	29.08.2009	29.08.2009	02.12.2009	Inv: Hangu
44.	Offg: SI Zainullah No.103/K	20.04.1957	01.08.1975	29.08.2009	29.08.2009	02.12.2009	Hangu Distt:
45.	Offg: SI Noor Jehan No.	12.09.1958	13.01.1979	29.08.2009	29.08.2009	18.08.2010	Hangu Distt:
46.	Offg: SI Nasrullah No.105/K	04.05.1960	21.10.1981	29.08.2009	29.08.2009	02.12.2009	SB KPK
47.	Offg: SI Muhammad Iqbal No.106	01.01.1960	01.03.1979	29.08.2009	29.08.2009	02.12.2009	Karak Distt:
48.	Offg: SI Amjid Hussain	04.04.1975	28.11.1994	18.08.2010	18.08.2010	17.08.2011	PTC Hangu
49.	Offg: SI Jan Ali 126/k		09.10.1983	17.05.2011	17.05.2011	13.10.2011	Kohat District
50.	Offg: SI Sardar Khan 127/k	05.02.1962	27.12.1980	17.05.2011	17.05.2011	13.10.2011	CTD KPK
51.	Offg: SI Gul Rehman 128/k	01.04.1957	10.07.1977	17.05.2011	17.05.2011	13.10.2011	Inv: Kohat
52.	Offg: SI Muhammad Nazir 130/k	18.03.1964	01.06.1982	17.05.2011	17.05.2011	13.10.2011	CTD KPK
53.	Offg: SI Nazir Azam 131/k	07.06.1955	01.06.1980	17.05.2011	17.05.2011	13.10.2011	Kohat District
54.	Offg: SI Muhammad Kamal 133/k	10.08.1956	01.08.1975	17.05.2011	17.05.2011	13.10.2011	Karak District
55.	Offg: SI Nasrullah Khan 135 k	03.01.1960	01.06.1980	17.05.2011	17.05.2011	13.10.2011	Hangu District
56.	Offg: SI Zulfat Ali Shah 136/k	14.03.1958	26.12.1977	17.05.2011	17.05.2011	04.06.2012	CTD KPK
57.	Offg: SI Faizullah 137/k	10.08.1964	20.09.1982	17.05.2011	17.05.2011	04.06.2012	CTD KPK
58.	Offg: SI Aleem Khan 138/k	25.02.1957	08.12.1975	17.05.2011	17.05.2011	15.08.2012	Karak District
59.	Offg: SI Nek Nawaz-139/k	20.06.1955	11.06.1980	17.05.2011	17.05.2011	15.08.2012	Karak District

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97.	Off: SI Habib-ur-Rehman 166/k	03.07.1965	20.12.1982	13.10.2011	13.10.2011	09.04.2014	Traffic KPK-	Karak District
98.	Off: SI Izhar Ali 167/k	10.10.1964	21.12.1986	13.10.2011	13.10.2011	09.04.2014	CTD KPK	Karak District
99.	Off: SI Muhammad Rahim 169/k	01.01.1972	01.01.1994	13.10.2011	13.10.2011	09.04.2014	CTD KPK	Karak District
100.	Off: SI Javid Hussain 170/k	05.05.1976	16.11.1999	13.10.2011	13.10.2011	09.04.2014	CTD KPK	Karak District
101.	Off: SI Mujtaba Ali 171/k	04.01.1970	21.06.1988	13.10.2011	13.10.2011	09.04.2014	Karak District	Karak District
102.	Off: SI Nadar Khan 172/k	05.02.1966	22.03.1986	13.10.2011	13.10.2011	09.04.2014	Inv: Karak	Hangu District
103.	Off: SI Iqbal Ali 174/k	17.07.1968	22.06.1987	13.10.2011	13.10.2011	09.04.2014	Inv: Karak	Hangu District
104.	Off: SI Rasool Muhammad 175/k	10.02.1965	18.06.1983	13.10.2011	13.10.2011	09.04.2014	Kohat District	Kohat District
105.	Off: SI Nazar Abbass 177/k	08.03.1975	20.04.1993	13.10.2011	13.10.2011	09.04.2014	CTD KPK	Kohat District
106.	Off: SI Muhammad Azam 176/k	03.02.1973	15.01.1995	13.10.2011	13.10.2011	09.04.2014	Appel accepted and granted online seniority	Kohat District
107.	Off: SI Rizwan Ullah 179/k	01.08.1969	31.03.1988	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
108.	Off: SI Malik Jan 181/k	18.02.1965	06.03.1984	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
109.	Off: SI Yousaf Hayat 182/k	22.03.1967	27.09.1988	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
110.	Off: SI Shakeel Ahmed 183/k	02.02.1965	19.03.1987	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
111.	Off: SI Zardad Khan 184/k	18.02.1964	01.10.1987	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
112.	Off: SI Ahmed Hussain 185/k	08.05.1969	12.12.1988	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
113.	Off: SI Bahadar Nawaz 186/k	04.02.1967	26.12.1987	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
114.	Off: SI Muzaffar Khan 187/k	12.04.1961	23.12.1979	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
115.	Off: SI Awal Zaman 188/k	24.04.1969	27.09.1988	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
116.	Off: SI Islam-ud-Din 189/k	01.08.1964	01.12.1983	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
117.	Off: SI Shafi Muhammad 190/k	07.05.1963	01.01.1985	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
118.	Off: SI Muhammad Nawaz 191/k	21.03.1967	31.03.1988	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
119.	Off: SI Israr Ali 192/k	10.02.1966	10.10.1984	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
120.	Off: SI Abdul Qayum 193/k	23.07.1962	22.03.1986	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
121.	Off: SI Fazal Badshah 194/k	06.01.1965	15.12.1986	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
122.	Off: SI Ahmed Janan 195/k	01.01.1965	15.12.1986	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
123.	Off: SI Shadiullah 196/k	06.09.1971	30.01.1991	13.10.2011	13.10.2011	09.04.2014	Inv: Kohat	Kohat District
124.	Off: SI Sakti ur Rehman	04.03.1982	19.09.2007	19.09.2007	19.09.2007	07.01.2012	Inv: Kohat	Kohat District
125.	Off: SI Manzoor ur Rehman	19.04.1973	23.12.1991	05.08.2012	05.08.2012	07.01.2012	Inv: Kohat	Kohat District
126.	Off: SI Zeeshan Ahmed No.89/k	17.04.1979	12.02.2009	12.02.2009	12.02.2009	05.08.2012	Inv: Kohat	Kohat District
127.	Off: SI Fazal Mehmood No.90/k	12.12.1978	12.02.2009	12.02.2009	12.02.2009	05.08.2012	Inv: Kohat	Kohat District
128.	Off: SI Abbas Ali No.91/k	20.01.1985	12.02.2009	12.02.2009	12.02.2009	05.08.2012	Inv: Kohat	Kohat District
129.	Off: SI Mujahid Hussain No.93/k	15.03.1988	28.02.2009	28.02.2009	28.02.2009	05.08.2012	Inv: Kohat	Kohat District
130.	Off: SI Sahib-ur-Rehman	21.04.1968	22.06.1986	20.01.2013	20.01.2013	05.08.2012	Inv: Kohat	Kohat District
131.	Off: SI Muhammad Tariq No. 58/k	03.03.1986	21.10.2006	21.10.2006	21.10.2006	05.08.2012	Inv: Kohat	Kohat District
132.								
133.								

134.	ASI Imran Khan No.92/K	23.01.1986	28.02.2009	28.02.2009	16.07.2013	
135.	ASI Abdul Hameed No. 11/K	13.08.1984	18.06.2009	18.06.2009	16.07.2013	Kohat District
136.	ASI Riaz Hussain No. 04/K	12.01.1979	20.02.2010	20.02.2010	16.07.2013	Kohat District
137.	ASI Noor Muhammad No. 05/K	20.12.1981	20.02.2010	20.02.2010	16.07.2013	Kohat District
138.	ASI Jamshaid Ali No. 14/K	12.06.1980	20.02.2010	20.02.2010	06.01.2014	Kohat District
139.	ASI Saeed Ur Rehman 43/K	20.01.1983	20.02.2010	20.02.2010	16.07.2013	Hangu District
140.	ASI Nasir Abbas Noori No. 16/K	06.02.1971	17.02.2010	17.02.2010	16.07.2013	Karak District
141.	ASI Roman Ullah No. 112/K	06.03.1970	23.07.2010	23.07.2010	16.07.2013	Kohat District
142.	ASI Farman Ullah No. 113/K	15.04.1983	23.07.2010	23.07.2010	26.07.2013	Kohat District
143.	ASI Rehan Ullah No. 114/K	20.01.1987	23.07.2010	23.07.2010	03.06.2014	Karak District
144.	ASI Muhammad Ayaz No. 115/K	18.07.1987	23.07.2010	23.07.2010	03.06.2014	Karak District
145.	ASI Fayaz Khan No. 118/K	17.02.1986	27.12.2010	27.12.2010	06.01.2014	Kohat District
146.	ASI Waqar Ahmad No. 120/K	10.04.1982	27.12.2010	27.12.2010	03.06.2014	Kohat District
147.	ASI Tariq Mehmood No. 121/K	02.02.1979	27.12.2010	27.12.2010	03.06.2014	Kohat District
148.	ASI Nabi Rehman No. 124/K	23.02.1980	27.12.2010	27.12.2010	03.06.2014	Hangu District
149.	ASI Muhammad Waqas No. 125/K	09.10.1984	27.12.2010	27.12.2010	03.06.2014	Hangu District
150.	ASI Ali Rehman No. 205 / K	10.10.1974	20.12.1994	21.03.2013	03.06.2014	Hangu District
151.	ASI Rahat Gul No. 199/K	25.02.1968	10.08.1991	23.08.2013	12.05.2014	PTC Hangu
					03.01.2014	PTC Hangu

**OFFICE OF THE DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION, KOHAT**

NO. 2006-08 /EC, Dated Kohat the 24 / 07 /2014.

Copy of above is forwarded to the:-

1. Provincial Police Officer, K.P.K, Peshawar.
2. Addl: IGP, Special Br: K.P.K, Peshawar.
3. Dy: Inspector General of Police Traffic K.P.K, Peshawar.
4. AIG/CID K.P.K, Peshawar
5. Commandant, PTC/Hangu.
6. District Police Officers, Kohat, Karak and Hangu.
7. Superintendent of Police Investigation, Kohat.
8. Supdt: of Police Investigation, Karak.
9. Supdt: of Police Investigation, Hangu.
10. Asstt: Secret Range office, Kohat.

**Note:-** The Police officers (concerned) may be informed of their seniority position. If they are not satisfied with their Seniority assigned to them, they should submit their representation within a period of one month from the date of receipt of this communication, failing which no representation will be entertained.



*SR e*  
*informing the concerned*  
*accordingly (through Central Room)*

*[Signature]*  
 Dy: Inspector General of Police,  
 Kohat Region, Kohat.

11

To

The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

Subject:-

DEPARTMENTAL APPEAL AGAINST IMPUGNED SENIORITY LIST PREPARED BY THE WORTHY DIG KOHAT REGION KOHAT AGAINST THE IMPUGNED SENIORITY LIST DATED 31-12-2013 & /Endst: No 6256-57/EC DATED 27-06-2014 AND 07-01-2015 IN WHICH THE SENIORITY LIST PREPARED BY THE WORTH DIG KOHAT REGION KOHAT AND PREPARED THE LIST "E" FOR THE PURPOSE OF PROMOTION AND PETITIONER NO 1 TO 14 WERE PLACED,/ CONSIDER JUNIOR THEN RESPONDENT NO 4 TO 53 AND PROMOTED RESPONDENT ON DATED 07-01-2015 ,FEELING AGGRIVED HENCE THIS DEPARTMENTAL APPEAL IS PREFERRED FOR THE END OF JUSTICE .

- 1:-ASI SAKHI REHMAN (PSI OF 2007) DISTRICT KOHAT.
- 2:-ASI ZESHAN AHMED (PSI OF 2009) DISTRICT HANGU
- 3:-ASI FAZAL MEHMOOD (PSI OF 2009) DISTRICT HANGU
- 4:-ASI ABAS ALI (PSI OF 2009) DISTRICT HANGU
- 5:-ASI MUJAHID HUSSAIN(PSI OF 2009)
- 6:-ASI IMRAN KHAN---PASI OF 2009
- 7:-ASI ABDUL HAMEED-----PSI OF 2010
- 8:-ASI JAMSHID ALI-----PSI OF 2010
- 9:-ASI RIAZ HUSSIAN -----PSI OF 2010
- 10:-ASI NOOR MUHAMMAD ---PSI OF 2010
- 11:-ASI SAEED UR REHMAN-----PSI OF 2010
- 12:-ASI ROMAN ULLAH -----PSI OF 2010
- 13:-ASI MUHAMMAD AYAZ-----PSI OF 2010
- 14:- ASI NASIR ABBAS NOORI-----PSI OF 2010----- (1 to 14 Petitioners)

1. :-ASI ABDUR RASHID NO:-145/K
2. :- ASI AKBAR SHAH NO-146
3. :-ASI ANWAR BADSHSH NO -147
4. :-ASI HAJI REHMAN NO-148
5. :-ASI ABDUR REHMAN NO-149
6. :-ASI SHAH WALI NO 150
7. :-ASI MUHAMMAD HAMYUN NO 152
8. :-ASI ABDUL NAWAB NO 151
9. :- ASI SHERIN JAN NO 153
10. :-ASI DOST MUHAMMAD -154
11. :-ASI SAKHI MARJAN
12. :-ASI KIRMAN ALI
13. :-ASI GUL SHAMEEN NO
14. :- ASI AMANULLAH
15. :-ASIMUHAMMAD ROKHAN
16. :-ASI SHAMEEN KHAN
17. :-ASI MEHBOOBULLAH NO
18. :-ASI RAZI GUL
19. :-ASI GUL HASSAN FAQIR
20. :-ASI HASSAN FAQIR
21. :-ASI AMIR ZAMAN (Promoted on 07-01-2015)
22. :-ASI ISHFAQ KHAN
23. :-ASI HABIB UR REHMAN
24. :-ASI AZHAR ALI
25. :-ASI TAHIR NAWAZ
26. :-ASI TAHIR NAWAZ
27. :-ASI GUL SHAH BARAZ
28. :-ASI MUJTABA
29. :-ASI NADAR KHAN
30. :-ASI SHAH DORAN
31. :-ASI RASOO MUHAMMAD
32. :-ASI MUHAMMAD AZAM
33. :-ASI NAZAR ABBAS
34. :-ASI MUHAMMAD ANWAR SHAH
35. :-ASI RIZWANULLAH
36. :-ASI MUHAMMAD JAMAL
37. :- ASI MAEIK JAN
38. :-ASI YOUSAF HAYAL

- 39. :-ASI SHAKEEL AHMED
- 40. :-ASI ZARDAD KHAN
- 41. :-ASI AHMED HUSSAIN
- 42. :-ASI BAHADAR NAWAZ
- 43. :-ASI MUZAFAR KHAN
- 44. :-ASI AWAL ZAMAN
- 45. :-ASI ISLAM UD DIN
- 46. :-ASI SHAFI MUHAMMAD
- 47. :-ASI MUHAMMAD NAWAZ
- 48. :-ASI ABDUL QAYYUM
- 49. :-ASI AHMED JANAN
- 50. :-ASI SHAHIDULLAH-----**(1 to 50 Respondents)**

**Respectfully /Sheweth,**

- 1:- That the petitioner In (seniority list dated 27-06-2014 from serial no 126-128-129-130-131-133 to 141 & 144 2007-2009-& 2010 respectively.
- 2:- That the petitioners were also confirmed in the same respective year mentioned in the seniority list , which stood on 31-12-2013.
- 3:- That when the list "E" was prepared for the purpose of promotion the petitioner no 1-to 14 were placed junior then respondent No 4 to 53 who were confirmed letter in time from the petitioner .
- 4:- That the impugned seniority list dated 31-12-2013, 27-06-2014 and 07-01-2015 is against the settled law of service promotion and rules ( Copy of impugned seniority list is annexed as annexure A)
- 5:- That the seniority counted from the date of confirmation and all the petitioners No 1 to 14 were confirmed in the year 2009-while the respondent were confirmed in the year of 2011.
- 6:-That for the purpose of promotion inter se seniority of ASI will be prepared from their date of confirmation not from their length of service in police department.



7:-That although all the respondents No 4 to 53 who placed senior then the petitioners in the seniority list their service length may be greater then the appellant ,but they were confirmed letter in time from the petitioners as ASI.

8:-That the petitioners No 1 to 14 are wrongly placed in list "E" for the purpose of promotion .

9:-That no proper procedure and service rules are follow by the police department as well as departmental promotion committee nor in the promotion in the of Sub-inspector.

10:-That in the identical situation in other districts like Abbottabad, Bannu etc, the seniority are prepared from the date of confirmation not their from their length of service .

11:- That the petitioners filed the departmental appeal along with judgment of writ petition no 875-P/2014 in which the honorable Majesty has directed to respondent No-1 to dispose of representation of the petitioners expeditiously, but no relief are given to the petitioners till date, (Copy of writ & judgment is annexed )

12:- That during the representation the respondent No-2 has issued a impugned promotion list which is the violation of service rules (copy of impugned list of respondent No 2 dated 16-04-2014 & 09-04-2014 07-01-15 is annexed)

13:- That the impugned seniority lists has been prepared on the formula of pick and chose and the respondent has given false consolation by the office of the respondent No-1 to 3 that soon another DPC meeting is going to be held and the name of petitioners 1 to14 shall be consider for promotion on the basis of confirmation till now it transpired to petitioners that they have been given false consolation.

14:- That the impugned Seniority Lists and order dated is continuous breach of petitioners' right not warranted by law.

**Prayer:-**

On accepting of this appeal , the respondent 1 to 3 are directed to correct the seniority list and the appellant 1- to 14 may be placed senior then the respondent 4-to 53 for the end of justice.

Petitioners 1- 14.

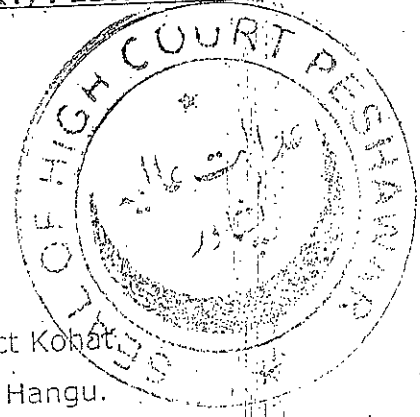
Riaz Hussain

Dated 12-01-2015

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

B-17

Writ Petition No. 875/P/2014



1. ASI Sakhi-E-Rehman (PSI of 2007) District Kohat.
2. ASI Zeshan Ahmed (PSI of 2009) District Hangu.
3. ASI Fazal Mehmood (PSI of 2009) District Hangu.
4. ASI Abas Ali (PSI of 2009) District Hangu.
5. ASI Mujahid Hussain (PSI of 2009) District Hangu.
6. ASI Imran Khan (PSI of 2009) District Kohat.
7. ASI Abdul Hameed (PSI of 2010) District Kohat.
8. ASI Jamshid Ali (PSI of 2010) District Hangu.
9. ASI Riaz Hussain (PSI of 2010) District Kohat.
10. ASI Nasir Abbas Noori (PSI of 2010) District Kohat.
11. ASI Noor Muhammad (PSI of 2010) District Kohat.
12. ASI Saeed ur Rehman (PSI of 2010) District Karak.
13. ASI Roman Ullah (PSI of 2010) District Kohat.
14. ASI Muhammad Ayaz (PSI of 2010) District Kohat.

**Petitioners**

**Versus**

1. Inspector General of Police, Khyber Pakhtun Khwa, Peshawar.
2. Deputy Inspector General Kohat Division, Kohat.
3. District Police Officer, Kohat.
4. ASI Abdur Rashid No.145/K.
5. ASI Akbar Shah No.146/K.
6. ASI Anwar Badshah No.147/K.
7. ASI Haji Rehman No.148/K.
8. ASI Abdur Rehman No.149/K.
9. ASI Shah Wali No.150/K.
10. ASI Abdul Nawab No.151/K.
11. ASI Muhammad Hamyun No.152/K.
12. ASI Sherin Jan No.153/K.

FILED TODAY

Deputy Registrar

18 MAR 2014

ATTESTED

EXAMINER  
Peshawar High Court.

22 SEP 2014

JUDGMENT SHEET  
PESHAWAR HIGH COURT, PESHAWAR  
JUDICIAL DEPARTMENT

Writ Petition No.875-P/2014

18

JUDGMENT

Date of hearing.....16-9-2014.....

Petitioner(s) by *M. Muhammad Amin Khattak, Lucha, Advocate*

Respondent(s) by *Syed Qasim Ali Shah, Advocate*

YAHYA AFIRDI, J.- ASI Sakh-i-Rehman and others, petitioners, seek Constitutional jurisdiction of this Court praying that

"It is, therefore, prayed that on acceptance of this Writ Petition, the respondent may be directed to correct the seniority list and petitioners may be placed senior than the respondents 4 to 55".

2. Respondents No. 1 to 3 have filed their comments wherein, in reply to ground "H", stated:

*"Correct to the extent that petitioners have filed a joint representation before respondent NO.1 which is under consideration at CPO Peshawar and is yet to be disposed of".*

3. In view of the above, this Court cannot pass any findings on merits and direct respondent NO.1

APPROVED  
EXAMINER  
Peshawar High Court.  
7 SEP 2014

to dispose of representation of the petitioners expeditiously.

4. This Writ Petition is disposed of in the above terms.

Dt. 16.9.2014.

*Yahya Akhidi*  
*Abdullah Khan*

JUDGE

JUDGE

\*Nawab Shah\*

CERTIFIED TO BE TRUE CO

Examiner  
Peshawar High Court, Peshawar  
Authorized Under Article 87  
The Constitution of Pakistan

22 SEP 2014

3831  
Date of Presentation of Application 22-9-14  
No of Pages 3P  
Cost 600  
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Dh... ..



*Yahya Akhidi*  
*Abdullah Khan*

BEFORE THE HONORABLE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 875-P/2014

ASI Sakhi-ur-Rehman and 13 others ..... Petitioner.

VERSUS

Provincial Police Officer,  
Khyber Pakhtunkhwa & others ..... Respondents.

Respectfully Sheweth:-

Parawise comments by Respondents No. 1, 2 & 3 are submitted as under:-

Preliminary objections:-

1. That the instant writ petition is not maintainable in the present form.
2. That the petitioners have not come to this Hon: Court with clean hands.
3. That the petitioners have got no cause of action.
4. That the Hon: Court has got no jurisdiction to entertain the instant writ petition under Article 212 of the constitution of Islamic Public of Pakistan as the case comes within domain of Hon: Service Tribunal.

Facts:-

1. Correct to the extent that petitioner No. 1 was appointed as PASI in the year 2007 while petitioners No. 2 to 7 were appointed as PASI in the year 2009 and the remaining petitioner from S. No. 8 to 14 were appointed in the year 2010.
2. That the petitioners were confirmed as ASI from the date of their appointment i.e. 2007, 2009 and 2010 by office of Respondent No. 2.
3. That the petitioner were placed junior to the respondent No. 4 to 55 for the reason that these respondents were promoted as ASI earlier than the petitioners.
4. Incorrect. All the petitioners have not challenged the seniority list as it stood on 31.12.2013 by filing departmental appeal. Petitioner No. 2 had file a representation before Respondent No. 2 which was examined and filed.

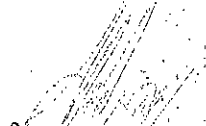
Grounds:-


- a. Incorrect. The seniority list as it stood on 31.12.2013 was prepared in accordance with Police Rules.
- b. The respondents No. 4 to 55 were promoted as ASI earlier than the petitioners.
- c. Incorrect. As stated in above para-b.
- d. It is correct that seniority list is to be prepared on the basis of date of confirmation of officers. However if date of confirmation of two officer is the same, then the age is to be taken into consideration as explained in Police rules 12-2 (3).
- e. Incorrect. The petitioners have been given correct place in the seniority list as it stood on 31.12.2013.
- f. Incorrect. The seniority list has been prepared in accordance with Rules.

Incorrect. As stated in above paras. Respondent No. 4 to 55 were promoted, as ASI earlier than the petitioners.

- h. Correct to the extent that petitioners have filed a joint representation before respondent No. 1 which is under consideration at CPO Peshawar and is yet to be disposed of.
- i. That the respondents may seek permission of this Hon. Court to submit any other points at the time of arguments.
- j. In view of above explanation, it is humbly prayed that the instant writ petition may kindly be dismissed.

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

  
 Deputy Inspector General of Police,  
 Kohat Region, Kohat  
 (Respondent No. 2)

  
 District Police Officer,  
 Kohat  
 (Respondent No. 3)

BEFORE THE HONORABLE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 875-P/2014

Asst Sakhi-ur-Rehman and 13 others..... Petitioner.

VERSUS

Provincial Police Officer,  
Khyber Pakhtunkhwa & others ..... Respondents.

AFFIDAVIT

I, Mian Imtiaz Gul DSP Legal Kohat, do hereby solemnly affirm and declared on oath on behalf of respondent No. 1, 2 & 3 that contents of parawise comments are correct and true to the best of my knowledge and belief. Nothing has been concealed from this Hon: Court.

Deponent

CNIC No. 14301-2009284-1

Identified by

Advocate General,  
Khyber Pakhtunkhwa,  
Peshawar

13386

I, Mian Imtiaz Gul DSP Legal Kohat, do hereby solemnly affirm and declared on oath on behalf of respondent No. 1, 2 & 3 that contents of parawise comments are correct and true to the best of my knowledge and belief. Nothing has been concealed from this Hon: Court.



## ORDER.

The following Assistant Sub Inspectors on list "E" of this Region are hereby approved for promotion in Departmental Promotion Committee Meeting held on 09.04.2014 to their next higher rank of Offg: Sub Inspectors on the existing vacancies of CTD and this Region with immediate effect.

Their promotion will take effect from the date they actually assume the charge of higher responsibility.

Their posting order will be issued separately:-

Sr.#	Rank & Name	District
1.	ASI Bashir Ahmed Niazi 12/K	PTC Hangu
2.	ASI Gul-Rehman 142/K	Special Branch
3.	ASI Abdur Rashid 145/K	PTC Hangu
4.	ASI Anar Badshah 147/K	Investigation Hangu
5.	ASI Hajji Rehman 14/K	Karak District / Upper College Course
6.	ASI Abdur Rehman 149/K	Kohat District / Upper College Course
7.	ASI Shah Wali 150/K	Hangu District
8.	ASI Abdul Nawab 151/K	Investigation Hangu
9.	ASI Muhammad Hamayon 152/K	Hangu District
10.	ASI Sherin Jan 153/K	Investigation Karak
11.	ASI Dost Muhammad 154/K	Karak District
12.	ASI Sakhi Marjan 155/K	Hangu District
13.	ASI Kirman Ali 156/K	Kohat District / Upper College Course
14.	ASI Gul Shahmeen 157/K	Karak District
15.	ASI Aman Ullah 158/K	Investigation Karak
16.	ASI Muhammad Rokhan 159/K	Karak District
17.	ASI Shahmeen Khan 160/K	Karak District
18.	ASI Mehboob Ullah 161/K	Hangu District
19.	ASI Razi Gul 7/K	Kohat District
20.	ASI Gul Shah Baraz 162/K	Hangu District / Upper College Course
21.	ASI Hassan Faqir 163/K	Kohat District
22.	ASI Ishfaq Khan 165/K	Karak District
23.	ASI Habib-Ur-Rehman 166/K	Karak District / Traffic KPI
24.	ASI Izhar Ali 167/K	Kohat District
25.	ASI Tahir Nawaz 168/K	Hangu District
26.	ASI Muhammad Rahim 169/K	Hangu District
27.	ASI Javid Hussain 170/K	Kohat District
28.	ASI Mujtaba Ali 171/K	Kohat District
29.	ASI Nadar Khan 172/K	Investigation Kohat
30.	ASI Iqrar Ali 174/K	Hangu District
31.	ASI Rasool Muhammad 175/K	Karak District

Necessary gazette notification may be issued accordingly.

(DR. ISHTIAQ AHMAD MARWAT)  
Dy: Inspector General of Police,

C-24

OFFICE OF THE DY: INSPECTOR GENERAL OF POLICE, KOHAT REGION, KOHAT

No. 3707-19 /EC, dated Kohat the 16/04 /2014.

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

23. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar
24. Addl: Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar
25. Commandant, Police Training College, Hangu
26. Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar
27. Director, Anti Corruption, Khyber Pakhtunkhwa, Peshawar
28. Asstt: Inspector General of Police, Traffic, Khyber Pakhtunkhwa, Peshawar
29. District Police Officer, Kohat
30. District Police Officer, Karak
31. District Police Officer, Hangu
32. All Heads of Inv: in Kohat Region
33. Confidential Clerk Region Office, Kohat

SRE/ASi

Bar n/cation



(DR. ISHTIYAS AHMAD MARWAT)  
Dy: Inspector General of Police,  
Kohat Region, Kohat.



ORDER.

e-25

The following Offg: SIs of this Region on promotion are hereby transferred / posted as under with immediate effect:-

Sr.#	Rank & Name	District
1.	Offg: SI Akbar Shah 146/k	Hangu
2.	Offg: SI Amir Zaman 164/K	Karak
3.	Offg: SI Nazar Abbas 177/k	Hangu
4.	Offg: SI Muhammad Azam 176/k	Karak
5.	Offg: SI Rizwan Ullah 179/k	Kohat
6.	Offg: SI Muhammad Jamal 180/k	Kohat
7.	Offg: SI Malik Jan 181/k	Kohat
8.	Offg: SI Yousaf Hayat 182/k	Hangu
9.	Offg: SI Shakeel Ahmed 183/k	Hangu
10.	Offg: SI Zardad Khan 184/k	Karak
11.	Offg: SI Ahmed Hussain 185/k	Kohat

Officials at Sr: No. 02, 05 & 08 are presently posted at CTD. They shall report on repatriation from CTD, while official at Sr: No. 04 is attached to district Kohat for purpose of pay etc till further order.

(DR. ISHTIAC AHMAD MARWAT)  
Dy: Inspector General of Police,  
Kohat Region, Kohat.

No. 208-18 /EC dated Kohat the 07/01 /2015

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

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Dy: Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar, for early repatriation of the officials mentioned above v/r to his office Endst: No. 19691-729/OSI/CTD, dated 26.11.2014.
3. District Police Officer, Kohat.
4. District Police Officer, Karak.
5. District Police Officer, Hangu.
6. All Heads of Inv: in Kohat Region.
7. Supdt: of Police, CTD Kohat Region.
8. Confidential Clerk Region Office, Kohat.



(DR. ISHTIAC AHMAD MARWAT)  
Dy: Inspector General of Police,  
Kohat Region, Kohat.

Following newly promoted Sub Inspectors are hereby transferred and posted to the Districts / Units noted against their names:-

Page 26

S. NO.	NAME & NO.	FROM	TO
01	SI Haq Nawaz No.277/H	Operational Wing Mansehra	Operational Wing Mansehra
02	SI Muhammad Sajjad No.278/H	Operational Wing Mansehra	Operational Wing Mansehra
03	SI Muhammad Ali Khan No.268/H	Operational Wing Abbottabad	Operational Wing Abbottabad
04	SI Asif Hussain No.287/H	Operational Wing Mansehra	Operational Wing Mansehra
05	SI Muhammad Javed No.269/H	Operational Wing Abbottabad	Operational Wing Haripur
06	SI Khan Afsar No.279/H	Operational Wing Mansehra	Operational Wing Mansehra
07	SI Naveed Ahmed No.280/H	Operational Wing Mansehra	Operational Wing Mansehra
08	SI Gohar Wakeel No.286/H	Investigation Wing Abbottabad	Operational Wing Upper Kohistan
09	SI Zari Khan No.282/H	Operational Wing Abbottabad	Operational Wing Mansehra
10	SI Saeed-ur-Rehman No.283/H	Operational Wing Abbottabad	Operational Wing Abbottabad
11	SI Muhammad Saeed No.281/H	Operational Wing Mansehra	Operational Wing Torghar

Regional Police Officer,  
Hazara Region (Abbottabad)  
(AEC, Dilawar)

No. 2245-50 /E, dated Abbottabad the 28-04-2014.

Copy of above is forwarded for information and necessary

action to the:-

1. District Police Officer Abbottabad.
2. District Police Officer Mansehra
3. District Police Officer Upper Kohistan.
4. District Police Officer Torghar.
5. Superintendent of Police Investigation Abbottabad.
6. OS / AS Region Office Abbottabad.


## 3. Promotion of Head Constables on list "D" to the rank of Offg: Sub Inspectors


There are 15 vacancies in the rank of Offg: Asstt: Sub Inspectors.


The cases of the following senior most Head Constables on list "D" were considered for promotion to the rank of Offg: ASIs on acting charge basis till the occurrence of regular vacancy falls in the promotes quota of this Region and decision arrived is as under: -


S. #	Rank & Name	Decision
1	HC. Safar Ali No.659	Approved for promotion
2	HC. Mehmood Alam No.44	Approved for promotion
3	HC. Hassan Khan No.29	Approved for promotion
4	HC. Maced-ur-Rehman No.23	Approved for promotion
5	HC. Yousaf No.162	Approved for promotion
6	HC. Anar Gul No.409	Approved for promotion
7	HC. Muhabbat Ali No.452	Approved for promotion
8	HC. Begu Khan No.218	Approved for promotion
9	HC Mubarik Shah	Approved for promotion
10	HC. Asif Hayat No.485	Approved for promotion
11	HC. Arshid Khan No.116	Approved for promotion
12	HC. Usman No.21	Approved for promotion
13	HC. Sabir Ali	Approved for promotion
14	HC. Syed Muhammad Hasnain	Defer on medical ground
15	HC. Muhammad Daud No.485	Approved for promotion
16	HC. Fazal Mehmood No.3	Approved for promotion

MEMBERS.

  
(ATTIQULLAH KHAN WAZIR)  
District Police Officer,  
Karak

  
(SAJJAD KHAN)  
District Police Officer,  
Hangu.

  
(MR. LAL FARID KHAN)  
Dy: Supdt: of Police City Kohat,  
For District Police Officer Kohat

  
(DR. ISHTIAQ AHMAD MARWAT)  
Dy: Inspector General of Police,  
Kohat Region, Kohat.  
Chairman.

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**ORDER.**

On creation of vacancies in the quota reserved for promotee, the following Acting Charge ASIs are hereby promoted to the rank of Offg: ASIs on the existing vacancies with effect from 28.01.2015:-

1. ASI Safar Ali No. 669
2. ASI Hassan Khan No. 29
3. ASI Maaed-ur-Rehman No. 23 ✓
4. ASI Yousaf No. 162
5. ASI Anar Gul No. 409
6. ASI Mohabat Ali No. 452

Necessary gazette notification may be issued accordingly.

*(Signature)*  
(DR. ISHTIAQ AHMAD MARWAT)  
Dy: Inspector General of Police,  
Kohat Region, Kohat

No. 1263-68/EC, dated Kohat the 18/02 /2015.

Copy of above is submitted to the Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar for favour of information.

3. All District Police Officers, Kohat Region.
4. All Heads of Investigation, Kohat Region.

SRe

Issue w/ Notification

*(Signature)*



*(Signature)*  
(DR. ISHTIAQ AHMAD MARWAT)  
Dy: Inspector General of Police,  
Kohat Region, Kohat

**MINUTES OF THE MEETING REGARDING SENIORITY CASE OF PROBATIONER ASIS AND PROMOTEE ASIS HELD ON 08.07.2013.**

A meeting of the committee held on 08.07.2013 in the office of AIG/Establishment CPO, Peshawar to discuss the seniority case of Probationer ASIs and promotee ASIs of CCP, Peshawar.

The following attended the meeting:


1	Syed Fida Hassan Shah, AIG/Establishment CPO	Chairman
2	Mr. Masood Ahmad Khalil, SSP/Investigation CCP, Peshawar	Member
3	Mian Imtiaz Gul, DSP/Legal	Member
3	Mr. Farman Khan, Office Supdt: Secret CPO	Member
4	Mr. Kiramat Ullah Office Supdt: Establishment CPO	Member
5	Mr. Farhad Ali Khan Office Supdt: CCP, Peshawar	Member


The committee after threadbare discussion came to the conclusion that the subject matter may be decided in the light of Police Rule 12.2 (3) which reproduce below:

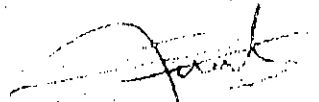
"Seniority, in the case of upper subordinates, will be reckoned in the first instance from date of first appointment, officers promoted from a lower rank being considered senior to persons appointed direct on the same date and the seniority of officers appointed direct on the same date being reckoned according to age. Seniority shall, however be finally settled by dates of confirmation".

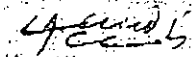
Therefore, the committee unanimously recommends that a single joint notification consisting of PASIs and promotee ASIs be prepared according to their date of confirmation as ASI and be issued accordingly. Their seniority be fixed as per Police Rules 12.2(3) mentioned above and their names to be brought on list "E" with immediate effect. The contention of PASIs to bring their names on promotion to list "E" with retrospective effect, is not justified under the rules.

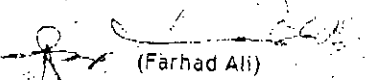
  
(SYED FIDA HASSAN SHAH)  
CHAIRMAN  
AIG/Establishment CPO.

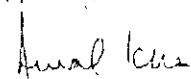
  
(Mr. MASOOD AHMAD KHALIL)  
MEMBER  
SSP/Investigation  
CCP, Peshawar

  
(MIAN IMTIAZ GUL)  
Member  
DSP/Legal  
CPO, Peshawar

  
(Mr. Farman Khan)  
Member  
Office Supdt: Secret CPO

  
(Mian Kiramatullah)  
Member  
Office Supdt: Establishment

  
(Farhad Ali)  
Member  
Office Supdt: CCP, Peshawar

Approved  
  
(AWAL KHAN)  
DIG/Headquarters  
Khyber Pakhtunkhwa Peshawar.

Annexure  
L-30  
D-36

POLICE DEPTT:

KOHAT REGION

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD IN REGION OFFICE, KOHAT ON 05.05.2010.

A meeting of the Departmental Promotion Committee comprising the following Police officers was held in Region office, Kohat on 05.05.2010 under the Chairmanship of Dy. Inspector General of Police, Kohat Region, Kohat:-

1. Mr. Dilawar-Khan Bangash = District Police Officer, Kohat.
2. Mr. Sajid Khan Momand = District Police Officer, Karak.
3. Mr. Abdul Majeed Khan Afridi = District Police Officer, Hangu.

1. CONFIRMATION / PROMOTION TO LIST "E" OF PROBATIONER ASST SUB INSPECTORS.

There were (07) vacancies in the rank of ASIs in this Region. The cases of the following Senior Most PIASs were examined for confirmation / promotion to list "E" and the decision arrived at is as under:-

S.No.	Rank, Name & Number	Decision
1.	PIASI Sadat Khan No.25/K	Confirmed and brought on list "E" from the date of appointment i.e 25.09.2006
2.	PIASI Ghazi Rehman No.66/K	Confirmed and brought on list "E" from the date of appointment i.e 04.10.2006
3.	PIASI Shaliq-ur-Rehman No.17/K	Confirmed and brought on list "E" from the date of appointment i.e 28.12.2006
4.	PIASI Ghulam Murlaza No.69/K	Confirmed and brought on list "E" from the date of appointment i.e 28.12.2006
5.	PIASI Nazar Hussain No.70/K	Confirmed and brought on list "E" from the date of appointment i.e 28.12.2006
6.	PIASI Muhammad Yousof No.71/K	Confirmed and brought on list "E" from the date of appointment i.e 28.12.2006
7.	PIASI Nazir Khan No.72/K	Confirmed and brought on list "E" from the date of appointment i.e 28.12.2006
8.	PIASI Abid Khan Afridi No.74/K	Stand confirmed / brought on list "E" from the date of appointment i.e 28.12.2006 on the availability of vacancy
9.	PIASI Shoukat Hayat No.13/K	Stand confirmed / brought on list "E" from the date of appointment i.e 04.03.2006 on the availability of vacancy
10.	PIASI Umer Hayat No.20/K	Stand confirmed / brought on list "E" from the date of appointment i.e 04.03.2006 on the availability of vacancy

PRESIDENT

(ABDULLAH KHAN) PSP  
Dy. Inspector General of Police,  
Kohat Region, Kohat.

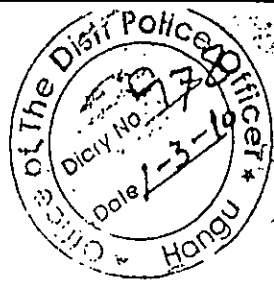
MEMBERS:

(DILAWAR KHAN BANGASH)  
District Police Officer,  
Kohat

(SAJID KHAN MOMAND)  
District Police Officer,  
Karak

(ABDUL MAJEED KHAN AFIRDI)  
District Police Officer,  
Hangu





*Annekhme*  
D-31

09255301

POLICE DEPARTMENT

KOHAT REGION

ORDER

In pursuance to the recommendation of NWFP Public Service Commission pertaining to the appointment of Asstt. Sub-Inspectors in Police Department vide letter No. NWFP/P.S.C./EXAM-ASI/08-09/09672 dated 17.02.2010 and Provincial Police Officer NWFP Peshawar Orders vide Memo No. 5244-50/E-II dated 20.02.2010, the following Graduate Constables & Head Constables of this Region Police are hereby approved for appointment as Asstt. Sub-Inspectors BPS-C on three year probation against the 19% quota reserved for direct appointment in Police Department vide Government of NWFP Home & T.As Department letter No. Police / HD / 13-22/04 dated 15.01.2004.

They are allotted Range Number as follows:-

- |    |                          |   |                |
|----|--------------------------|---|----------------|
| 1. | Riaz Hussain No.4/K      | = | Hangu District |
| 2. | Noor Muhammad No.5/K     | = | Kohat District |
| 3. | Jamshid Ali No.14/K      | = | Hangu District |
| 4. | Nasir Abbas Noon No.16/K | = | Kohat District |

Necessary gazette notification may be issued accordingly.

*OB No = 141*  
*1-3-2010*

*Abdullah Khan*  
(ABDULLAH KHAN) P.S.P  
Dy. Inspector General of Police  
Kohat Region, Kohat

No. 1844-49 /EC, dated Kohat the 01 / 3 /2010.

Copy of above is submitted to the:

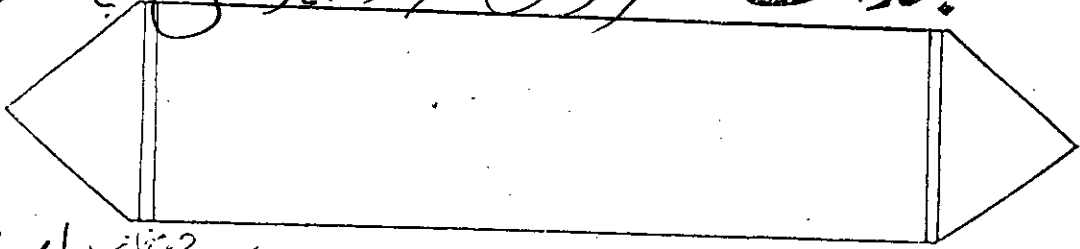
1. Provincial Police Officer, NWFP Peshawar.
2. Mr. Amir Kalam Shah, Director Examination, NWFP, Public Service Commission Bungalow No.51 Street No.3 Sector No.F-I, Phase No.01 Hayatabad Peshawar
3. District Police Officer, Kohat: Hangu.
4. District Account Officer Kohat.
5. District Account Officer Hangu.
6. Assistant Secret Region Office, Kohat

For favour of information with the  
Memo No 4244-50/E-II  
Dt. 20.02.2010

For information & necessary action please

*Abdullah Khan*  
(ABDULLAH KHAN) P.S.P  
Dy. Inspector General of Police  
Kohat Region, Kohat

# بعدالت کروں ٹرو بیونٹی ٹاور



2۔ منجانب اسپیکر  
بنام

IGP  
DIG  
DPO

ریاض حسین

مورخہ  
مقدمہ  
دعویٰ  
جرم

باعث تحریر آئنگ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی و جواب دہی وکل کاروائی متعلقہ

آن مقام پٹنور کیلئے سید عدنان سید ذوال

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک ورد پیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری یکطرفہ یا اپیل کی براندگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیردی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہر ادیا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پروا خستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائنہ التوائے مقدمہ کے سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیردی مذکور کریں۔ لہذا دکالت نامہ لکھد یا کہ سندر ہے۔

المرقوم 11 - ماہ جولائی 2015

کے لئے منظور ہے۔

*Mud*

بمقام

*Riaz*

رسید واری

میں، باقی میں ۱۹۹۹ میں، ان کے لیے روئے کار کے لئے کیا گیا  
ان میں سے ایک کے لئے کیا گیا، باقی میں سے روئے کار کے لئے کیا گیا  
میں سے روئے کار کے لئے کیا گیا۔

Read

باقی میں ۱۹۹۹

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

Service appeal No. 586/2015

ASI Riaz Hussain s/o Muhammad Hussain

.....Appellant.

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar and others

..... Respondents.

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.**

**Respectively Sheweth:-**

Parawise comments are submitted as under:-

**Preliminary Objections:-**

1. That the appeal is not maintainable in the present form.
2. That the appellant has got no cause of action.
3. That the appellant has not come to this Hon: Tribunal with clean hands.
4. That the appeal is badly time barred.
5. That the appeal is bad for misjoinder of unnecessary parties and non-joinder of necessary parties.

**FACTS:-**

1. Incorrect. A fresh seniority list "E" of ASIs as it stood on 31.12.2015 has been prepared according to Police Rules 12-2 (3) and 13-18 as well as guidelines received from CPO Peshawar vide Letter Endst: No. 2278-83/E-II dated 28.01.2013, 16399-404/E-II dated 11.07.2013 & 268-73/E-III dated 28.01.2015, that seniority in case of upper subordinate shall be reckoned from the date of confirmation vide DIG Kohat Region, Kohat No. 1093-1105/EC dated 02.02.2016. Copy enclosed as annexure "A-B-C-D". The appellant was given due seniority in this fresh seniority list according to his date of confirmation as ASI.
2. Incorrect. The appellant was given due seniority in the fresh seniority list "E" as it stood on 31.12.2015 from the date of his confirmation i.e 19.09.2007.
3. Incorrect. A fresh seniority list "E" as its stood on 31.12.2015 has been prepared according to Police Rules 12-2 (3) & 13-18 as well as guidelines received from CPO Peshawar mentioned in para No. 1 in which all the ASIs including appellant have been given due seniority according to their date of confirmation.
4. Correct to the extent that appellant filed departmental appeal. The remaining portion of the para is incorrect because a fresh seniority list has been prepared in accordance with law & rules and appellant has been given due seniority according to his date of confirmation.

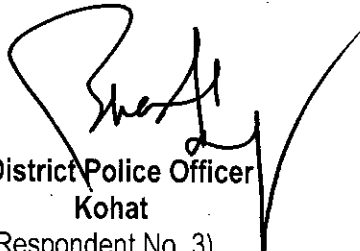
## GROUNDS:-

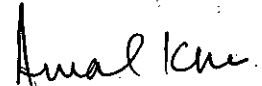
- A. Incorrect. A fresh seniority list "E" of ASIs as it stood on 31.12.2015 has been prepared according to Police Rules 12-2 (3) and 13-18 as well as guidelines received from CPO Peshawar vide Letter Endst: No. 2278-83/E-II dated 28.01.2013, 16399-404/E-II dated 11.07.2013 and 268-73/E-III dated 28.01.2015, that seniority in case of upper subordinate shall be reckoned from the date of confirmation vide DIG Kohat Region, Kohat No. 1093-1105/EC dated 02.02.2016. Already annexed as annexure "A-B-C-D". The appellant was given due seniority in this fresh seniority list according to his date of confirmation.
- B. Correct to the extent that the seniority counted list the date of confirmation. The remaining portion of the para is incorrect. A fresh seniority as it stood on 31.12.2015 has been prepared according to date of confirmation and appellant was given due seniority in this fresh list according to his date of confirmation.
- C. Correct to the extent that for the purpose of promotion seniority of ASIs will be prepared from their date of confirmation. Therefore, a fresh seniority list "E" as it stood on 31.12.2015 has been prepared from the date of confirmation and appellant was given due seniority according to his date of confirmation as ASI.
- D. Incorrect. All the ASIs including appellant have been given due seniority according to their date of confirmation in a fresh list "E" as it stood on 31.12.2015.
- E. Incorrect. The appellant was correctly placed in seniority list "E" according to his date of confirmation.
- F. Incorrect. The seniority list "E" has been prepared in accordance with law & rules.
- G. Incorrect. The seniority list "E" of this region has also been prepared from the date of confirmation and not from the length of service.
- H. Incorrect. A fresh seniority list "E" as it stood on 31.12.2015 has been prepared in accordance with law & rules and in the light of judgments of Apex Court according to date of confirmation. The appellant was given due seniority according to his date of confirmation as ASI.
- I. Incorrect. A fresh seniority list as it stood on 31.12.2015 has been issued by the Authority in accordance with law & rules from the date of confirmation.
- J. A fresh seniority list "E" has been prepared in accordance with law & rules.
- K. The seniority list "E" has been prepared in accordance with law & rules and in the light of judgment of the apex court according to date of confirmation and all the ASIs including the appellant have been given their due seniority according to their date of confirmation.
- L. Incorrect. According to rules for the purpose of confirmation as Sub Inspector the offig: Sis besides completion of the probation period must have to undergo mandatory courses and successfully complete an independent period of posting.
- M. Incorrect. All the ASIs have been placed in the seniority list according to their respective date of confirmation as ASIs in accordance with law & rules.
- N. Incorrect. The seniority list "E" as it stood on 31.12.2015 has been prepared in accordance with law & rules, according to date of confirmation and all the ASIs including the appellant have been given their due seniority according to their respective date of confirmation.


O. Incorrect. The seniority list "E" was prepared in accordance with law & rules, according to the date of confirmation.

The respondents may also be allowed to advance additional ground at the time of hearing of appeal.

In view of the above, it is prayed that on acceptance of this reply, the instant appeal of the appellants may kindly be dismissed with cost.

  
District Police Officer  
Kohat  
(Respondent No. 3)

  
Dy: Inspector General of Police,  
Kohat Region, Kohat  
(Respondent No. 2)

  
Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar  
(Respondent No. 1)

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

Service appeal No. 586/2015

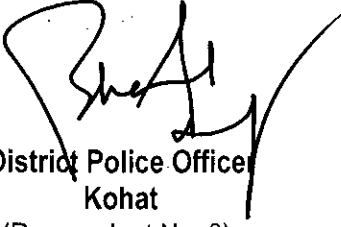
ASI Riaz Hussain s/o Muhammad Hussain ..... Appellant.

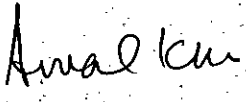
**VERSUS**

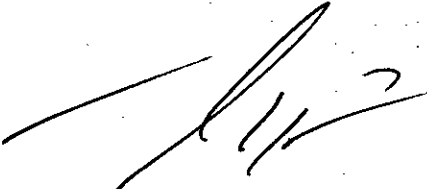
Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar and others ..... Respondents.

**COUNTER AFFIDAVIT**

We, the below mentioned respondents, do hereby solemnly affirm and declare on oath that contents of parwise comments are correct and true to the best of our knowledge and belief. Nothing has been concealed from this Hon: Court.

  
District Police Officer  
Kohat  
(Respondent No. 3)

  
Dy: Inspector General of Police,  
Kohat Region, Kohat  
(Respondent No. 2)

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

**BEFORE THE HONOABLE KPK SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No. \_\_\_\_\_

*Raiz Hussain (Asi)*

Appellant.

Versus

Inspector General of Police KPK Peshawar and others.

Respondent.

**Rejoinder for and on behalf of appellant to the comments ,filed by respondents**

Respected Sheweth,

Rejoinder to the comments of respondent are as under.

Reply to Preliminary Objection :-

- 1:- That Para No-1 in preliminary Objection is incorrect because the appellant has good cause of action and balance of convenience is also in favour of present appellant
- 2:- That Para No-2 is incorrect to the extent that the appellant is aggrieved from the impugned order dated
- 3:- That Para No-3 is incorrect ,the appellant has properly file departmentally appeal to the respondent above but in vain having no other alternate remedy except the instant appeal .
- 4:- That the Para No-4 is incorrect ,the appeal of the present appellant is with in time .
- 5:- That the Para No-5 is also incorrect the appellant according to law make necessary party .

Facts Reply:-

- 1:- Facts Para No- 1 is correct to the extent that the respondent above vide in even order date are according to rules but the so called guideline which were duly issued by the respondent above mentioned in comments the same type guideline were also issued from the worth PPO vide in memo No -14001-45/E-II dated 12-07-2012 is self explanatory in which the said PPO stated that no promotion to the rank of ASI will be made be the regional officer without getting prior permission from PPO .Permission for promotion to the Rank of ASI will on be accorded in vacancies are available in respective quoto reserved for the promotion for D list HC,s .Before filling the vacancies the RPO will send detail data of Posts & vacancies in his region and its appointment according to the laid down formula .
- 2:- That Para No 2 of Fact is incorrect on the basis that except present appellant rest of the appellant are appointed in the year of 2009 to-2010 .So the question of issuing of due seniority list is based on presumption and mis interpreting the version of the appellant .
- 3:- That Para No-3 of the Fact is correct as discussed above in Para No-1 hence need no comments but rest of the Para denied no proper revised seniority list has ever been issued nor implemented by the respondent..



4:- That Para No-4 of the Fact is correct to the extent that appellant has filed departmental appeal before the respondent in which no earlier decision announced but rest of the Para is denied because the said seniority list issued in violation of guideline of PPO also discussed in Para 1.

**Reply to reply of grounds:-**

1:- That the Para No-A of the grounds is correct to the extent that fresh seniority list has been issued but rest of the para denied because the respondent above have not prepared the list under the guideline duly issued from PPO office ,but the respondent still violating the rules for the purpose of promotion of the appellant .

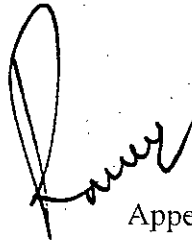
2:- That Para No- B,C,D,E,F,G of the grounds of comments is incorrect already discussed above in the leading Para's of facts hence need no deliberation.

3:- That Para No-H of the grounds is correct to the extent that Apex Court Judgment regarding the promotion on the basis of confirmation .Rest of the Para is denied.

4:- That Para No-I,J,K of the grounds of the comments of respondents above is incorrect already discussed above therefore needs no consideration .

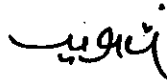
5:- That Para No-L of the grounds of the comments is not the relevant pretext of the present appellant hence no discussion while the rest of the Para of M,N,O of the Grounds of the comments received from the respondents above is incorrect and already discussed above needs no discussion..

On acceptance of this rejoinder the appeal may kindly be allowed as prayed for with all back benefits as deemed proper.



Appellant

Through



Syed Mudasir Pirzada  
Advocate District Courts  
Kohat

0345-9645854