BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 9139./2020

Khyber Palabtatchwa Service Tribunat Binry No. 4662 Dared 3/4/27

Bahadel Khan

V/S

Police Deptt:

APPLICATION FOR PLACING FILE CERTAIN DOCUMENTS ATTACHED WITH APPLICATION IN THE INSTANT APPEAL FOR PERUSAL OF THE HONORABLE TRIBUNAL TO REACH THE FAIR CONCLUSION OF THE CASE.

RESPECTFULLY SHEWETH:

- 1. That the appellant has filed the instant appeal in this Honorable Tribunal against for notional promotion to the rank of Inspector.
- 2. That the instant appeal is fix on 03.04.2023 before this Honorable Tribunal and the appellant wants to place certain documents attached with this application for perusal of this Honorable Tribunal to reach the fair conclusion of the case. (Copy of documents are attached as Annexure-R-1)

It is therefore most humbly prayed that on the acceptance of this application, the documents attached with the instant application may kindly be considered as integral part of the appeal and may also be perused to reach the fair conclusion of the case.

THROUGH:

APPELLAN

TAIMUR ALI KHAN ADVOCATE HIGH COURT POLICE DEPTT:

I O<u>R PUBLICATION IN THE KHYBER PAKHTUNKHWA. POLICE GAZETTE PART-II.</u> ORDERS BY THE CAPITAL CITY POLICE OFFICER KHYBER PAKHTUNKHWA, PESHAWAR. NOTIFICATION.

No. ____/IG.7___/EC-I, CONFIRMATION IN THE RANK OF SIS:- As per recommendation of Departmental Promotion Committee meeting held on 24-02-2016, the Dated 1 3_12016. following Offg: SIs of Capital City Police Peshawar is hereby confirmed in rank of SI with

On confirmation they are allotted new Capital City Police Peshawar number as noted against each:-

~	Rank, Name & No	Present Posting	1	Recommendation
	Olig: SI Mehmood Ali No. 34/P	CCP, Peshawa:	<u> </u>	<u>. </u>
2	Olig: ST Khalid Khan No. 97/MR 569/P		1.7557	Confirmed
	Ulla: SI Shaukal Ali No. 117/P	Special Branch	P/335	Confirmed. However, according to S/O No. 3/2015, he will complete and qualify Training Course and will earn two (02) points.
· ,		CCP, Peshawar	P/336	Confirmed
4.1	Oller SLM Harris (CCP, Peshawar	P/337	Confirmed. However, according to S/O No. 3/2015, hi: will complete and qualify training Course and will carn two (02) points.
-	Olly: SI M. Racheed No. 101/MR, 727/P Olly: SI Razd Ali No. 26/MR 673/P	Charsadda	P/338	Confirmed. However, according to S/O No. 3/2015, he will complete and qualify Training Course and will earn two (02) points.
	Offg: SI Sharns - UI- Qamar No. 281/P	Special Branch	P/339	Confirmed. However, according to 5/O No. 3/2015, he will complete and qualify Training Course and will earn two (02) points.
	·	Special Branch	P/340	Confirmed. However, according to S/O No. 3/2015, fie will complete and qualify Training Course and will yorn two (02) points.
	Ollg: SI Bahadar Khan No. 283/P Dilg: SI Jan Muhammad No. 248/P	CCP, Peshawar		Confirmed. However, according to 5/0 No. 3/2015, he will complete and qualify Training Course and will corn two (02) points.
	Dflg: SI Murad Ali No. 304/P	CCP, Peshawar	P/342	Confirmed.
	119: 51 Satz Ali No. 310/P	CCP, Peshawar		Confirmed. Towever, according to 5/0 No. 3/2015, he will complete and qualify reaming Course and will earn two (02) points.
	лоў. 51 5002 АН №. 310/Р	CCP, Peshawar	רא (1 1 2 1 2 1	tonlimed, lowever, according to /O No. 3/2015, he will omplete and qualify raining Coursé and will arn two (02) points.

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\mathbf{V}_{i}	2. j Otig: SJ Mumtaz Khan No. 324/P				
		CCF, F	รรุปๆพว่า:	P/345	Confirmed, However, according b
					S/O IIo. 3/2015, he w complete and qualify Training Course and v
J	L. Ollg: SI Gulzar Khan No. 384/P				earn two (02) points.
. 1	 (all): SI Pohanmud Rusz No. 406/P 	Inv; KP		P/346	Confia med.
	S Other ST Shun Nawaz No. 412/P		shawar	P/347	Confirmed.
,		CCP, Te	shawar	P7348	Confirmed. However, according to S/O No. 3/2015, he w complete and qualify Training Course and w earn two (02) points.
V 1	Sig: SElhsan Ullah No.439/P	Special	Branch	P/349	Confirmed,
•					However, according to 5/0 Do. 3/2015, he was complete and quality Training Course and w corn two (02) points.
	Ully: St Shah Jehan No.445/P	Traffic, I	Peshawar	P/350	Confirmed,
:	Ollrj: SI Liagut Ali No.453/P	CCP, Re	shawa:	9/351	Confirmed. However, according to S/O file, 3/2015, he will complete and qualify Training Course and w earn two (02) points.
	Offg: SI Rehmot Wali No. 465/P	CCP, Pes	hawar	P/352	Confirmed. However, according to S/O No. 3/2015, he will complete and qualify Training Course and w
20	offg: SI Sajawal Khan No. 475/P	Special U	liancn	P/353	carn two (02) points.
21	Offg: SI Murad Ali No. 498/P	Special 0	ranch	P/354	Confirmed.
					However, according to S/O No. 3/2015, he will complete and qualify Training Course and will earn two (02) points.
<i>.</i>		CCP, Pes	hawar	P/355 .	Confirmed.
	1	Special U	runch	P/356	Confirmed. However, according to S/O No. 3/2015, he will complete and qualify Training Course and will carn two (02) points.
	Olig: SI Maqbalı Khan No. 547/P	СТО КРК	·.	P/357	Confirmed. However, according to S/O No. 3/2015, he will complete and qualify Training Course and will earn two (02) points.
245	Olloj: SEThsan Ullah No. SST/P	Special B	rauch	P/358	Confirmed. However, according to S/O No. 3/2015, he will complete and qualify Training Course and will earn two (02) points.
ú	Gilg: SI Fazle Subhan No. 522/P	CCP, Pesi	haviar	₽/359	Confirmed.
	Olig: SI Karam Llahr No.1107/P	CCP, Pes	hawar	P/360	Continued
	Öfig: Si Neor Muhammad-620/P	CCP, Pris	hawar	P/361	Confirmed. However, according to S/O No. 3/2015, he will complete and qualify Training Course and wi earn two (02) points.

•	Olig: Si Hidayat-ur- Rehman No							
	N. On SLADWARD			Branch	P	/362	Confirmed. However, acco S/O No. 3/201 Complete and c Training Course earn two (02).c	>, he will Jualify
	ST Knushdi Ku		CCP, Pes			63	earn two (02) p Confirmed	oints.
		. / 	CCP, Pesi		P/3	64		
		··	CCP, Pesh		P/30		Confirmed.	
	Olig: ST Abdur Rashid No. 838/P		CCP, Pesha	war	P/36		Confirmed.	
	10. U38/P		CCP, Pesha	war	P/36		Confirmed.	
:	35 Off: SI Mushtaq Ali No. 842/P		•.			·	Confirmed, However, accordin S/O No. 3/2015, h complete and sources	19 to 16 will
ļ	io. Ou SI Khan Ch		CCP, Peshaw			_	Training Court	'' Y
	20. On SI Khan Chalib No. 846/p	/	TD KPK		P/368		Confirmed.	<u>ts.</u>
:			B NEK		P/369	1	Confirmed.	
 	37 OII: SI Azeem Khan No. 847/P						Nowever, according S/O No. 3/2015, he	will
	·i	Eli	LC Force KPR	╧╌┼╴	/370		arn Lwo (02) or inter	
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:	Off: SEJehanzeb No. 857/P	ſ		1.		C	Ompieto and a	∾ilt j
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1.5	DIL SLADE	ĺ				Cor	Uninto and	ill
1.	OII: SI Ashfaq Alam No. 865/P	Speci	ial Branch	-+			ming Course and w D Lvo (02) points.	or
			and rich		37 <u>2</u>	Hus	vever arrow	
10	000-00-00-00-00-00-00-00-00-00-00-00-00					COL	no. 3/2015, he wil	
	Olig: St Aziz Ullah No. 866	Traffic	, Peshawar	·		1 0	ning Course and with two (02) points.	r
			5 T C303W67	P/3	73		limed. ever, according to	-1
·	· · · · · · · · · · · · · · · · · · ·			1		1.120	No. 3/2015, he will plete and quality	
·/].	Off: SI Musa khan No. 879/P			1		1.100	100 Course and way	
		Special	Branch	P/37	4	Com	two (02) points.	-
			•	 		- uyo r	ver, according to vo. 3/2015, he will	1
-2	Orly: ST Islah Ud Din No.3881/P					Tram	rete and qualify	
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i	•					Howe	ver, according to lo. 3/2015, he will	-
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В.	Off: SI Imdad Ullah No.1113/P	Special (Branch	P/376	 +	<u>earn t</u> Confir	wo (02) points,	- `
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	<u>*`</u> .					compl	lo. 3/2015, he will lete and qualify	
	······	 				earn t	ng Course and will two (02) points.	-
44. 	Offg: SI Irshad Ali No.1314/P	Nowshe		P/371		Confir		<u> </u>
45.	Offg: SI Muhammad Ismail No.1122/P	Nowshe	ira	P/37	B		ver, according to	
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	· · · · ·			=		carn	ng Course and will two (02) points.	-1
ίü.	Offg: SI Muhammad Naeem No.1123/P	Special	Branch	P/37	9	Huwe	rined. ever, according to	1
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	· ·			ł		ាកមហ	ing Course and will two (02) points.	
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def Creater Statumannad Javed No.1126/P Special Branch P/380 Confirmed. However, according to S/O No. 3/2015, he will complete and qualify . Training Course and will eart: two (02) points. Juni (Jung: 51 Javed Iqual No. 956 CCP/Peshawar P/381 Confirmed. Nowever, according to S/O No. 3/2015, he will complete and qualify Training Course and will earn two (02) points. 1211.1 Of Furhad Hussam No.987/P Confirmed. CCI Peshawar P/382 However, according to S/O No. 3/2015, be will complete and quality j Training Course and will para two (02) points. P/383 Confirmed. CCI, Peshawar Sectional Contract Ale Gold 997/P Contribut. 17384 CCP, Peshawar st. Long of Zahir Shah Bol1001/P Confirmed P/385 Continued However, according to 5/0 No. 3/2015, he will complete and qualify Training Course and will earn two (02) course. CCP, Peshawar SP Tele: 5 Deemal Gut No.1006/P 19/386 (1)น้ำรอปปอ St. Trady St Gut Shed No.1152/P earn two (02) points. Confirmed. However, according to S/O No. 3/2015, he will P/387 Special Branch 24 Chapter Mayed Rokhan Shah No. 1009/P complete and qualify Training Course and will carn two (02) points. Continned. P/388 CCP, Peshawar St. Char St Knushal Khan No.06/P Confirmed. P/389 ·CCP, Peshawar to. Uthy 10 Himayat Ullah No.1025/P Confirmed. P/390 Special Granch Parp & Looste Diyon NO.1032/P 1 Continued. Committed. S/O No. 3/2015, he wai complete and qualify Training Course and will earn here (22) P/391 . . . Old. 51 tudect or Reinnan Do. 579/9 Acusiana earn two (02) points.

197 the SI Agillar Noscer No. 580/P Those SIs who's have not completed Mandatory Training/Courses under standing order No. 3/2015 working under your command may be selected for the baid tourses on priority basis and will early two (02) marks. After completion of their, courses reports may be sent to this office for pompletion of reflord please.

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ITY POLICE OFFICER, CAPITAI PESHAWAR.

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Continued

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

- Provincial Police Officer Knyber Pakhtunkhwa, Peshawar.
- Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa, 1. Peshawar, alongwith two spare copies for Publication, 2.
 - Addl: Inspector General of Police, Special Branch KPK, Peshawar
- Deputy Inspector General of Police, Mardan Region Mardan. З.
- Deputy Inspector General of Police CTD KPK, Peshawar. 4. 5.
- SSsP/Operation, Investigation & Traffic, Peshawar.
- 6. District Police Officer, Charsadda & Nowshera.
- Accurate Branch, & EC-II, CCP, Peshawar. 7. 8.
 - SI CONF; NOTI;

VAKALAT NAMA

NO/2021	,
IN THE COURT OF <u>KP SERVICE</u> TR'bu	nal Peshawar
Bahadel Ichan. VERSUS	(Appellant) (Petitioner) (Plaintiff)
Police Department	(Respondent) (Defendant)

Do hereby appoint and constitute *Taimur Ali Khan, Advocate High Court Peshawar,* to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2021

MMM (CLIENT)

ACCEPTER

TAIMURALI KHAN Advocate High Court BC-10-4240 CNIC: 17101-7395544-5 Cell No. 0333-9390916

OFFICE:

Room # FR-8, 4th Floor, Bilour Plaza, Peshawar, Cantt: Peshawar