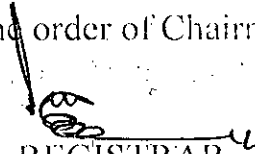


72

# FORM OF ORDER SHEET

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

Case No. - 571/2023


S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	15/03/2023	<p>The appeal of Mr. Atta Muhammad resubmitted today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mr. Atta Muhammad ASI No. 96/MR SSU CEPEC Headquarters Peshawar received today i.e. on 13.03.2023 is incomplete on the following score which is returned to the co Counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-E & G of the appeal are illegible which may be replaced by legible/better one.
- 2- Certificate be furnished that whether any appeal on the subject matter has earlier been filed in this Tribunal.

No. 928 /S.T,

Dt. 14/3 /2023

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Mir Zaman Safi Adv.  
High Court at Peshawar.

*Sir,*  
*Re-Submitted after compliance*  
*Mir Zaman*  
*15/3/2023*

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO. 571 /2023

ATTA MUHAMMAD

VS

POLICE DEPTT:

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4	Mad No. 10 & 12	<b>C &amp; D</b>	8- 10.
5	Impugned order	<b>E</b>	11.
6	Departmental appeal	<b>F</b>	12- 13.
7	Rejection order	<b>G</b>	14.
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9	Wakalat nama	.....	16.

**APPELLANT**

**THROUGH:**

  
**MIR ZAMAN SAFI**  
**ADVOCATE**

Office: Room No. 6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, Hashtnagri,  
Peshawar.

Cell: 0333-9991564

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

Appeal No. 571 /2023

Mr. Atta Muhammad, ASI No:96/MR,  
(SSU) CEPEC Headquarter, Peshawar.

.....APPELLANT

**VERSUS**

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Commandant Special Security Unit (SSU) CEPEC, Khyber Pakhtunkhwa, Peshawar.
- 3- The Deputy Commandant SSU CEPEC Khyber Pakhtunkhwa Peshawar.

.....RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 26.10.2022 WHEREBY MAJOR PENALTY OF REDUCTION IN RANK HAS BEEN AWARDED TO THE APPELLANT AND AGAINST THE APPELLATE ORDER 18.11.2022 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS AND AGAINST NO ACTION TAKEN ON THE REVISION PETITION WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER**

That on acceptance of this service appeal the impugned orders dated 26.10.2022 and 18.11.2022 may very kindly be set aside and the respondents be directed to restore the original rank of appellant i.e. Sub Inspector with effect from 26.10.2022 with all back benefits. Any other relief which this august Court deems appropriate may also be granted in favor the appellant.

**R/SHEWETH:**

**ON FACTS:**

Brief facts of the present appeal are as under:-

1. That the appellant is the employee of respondent department and presently serving as Incharge Paltoon No.7 (SSU) CPEC, Upper Kohistan quite efficiently up to the entire satisfaction of his superiors.

2. That the appellant while serving as Sub Inspector No.104 at Mardan region was transferred to Special Security Unit (CPEC). That after arrival, the appellant started his duty at the station concerned with honesty, wholeheartedly and with the entire satisfaction of his superiors.
3. That the appellant while posted as Incharge Rashakai Special Economic Zone platoon No.13 SSU RBC ordered IIC No.170 Muhammad Ishaq for reporting to Wing Commander Askari Cement Factory and issued Rawangi Mad No.06 of the Roznamcha dated 26-06-2022 but when the appellant asked telephonically regarding arrival he denied the order of appellant and subsequently used abusive language and threatened the appellant which is against the discipline of the Police Force. Copies of the Roznamcha Mad No.6 is attached as annexure.....A.
4. That the appellant issued roznamcha mad No.9 regarding disobedience and using abusive language and threats of the above named official. That it is pertinent to mention here that the appellant ordered 8/8 officials for duty in each spot CP-I and CP-II and on the checking that was found 2/2 constables on each spot. That on asking the officials on duty stated that IIC Muhammad Ishaq is the leader of our union and we will pursue his orders. Copy of the roznamcha Mad No.9 is attached as annexure.....B.
5. That later on it came into the knowledge of appellant that the Roznamcha Mad No.6, 7, 8 & 9 were found misplaced from the Roznamcha register which were removed from the register by the above named official i.e. IIC Muhammad Ishaq with the help of Inspector Tahir Khan and the same incident recorded by the appellant in roznamcha Mad No. 10 and as such informed the high ups through roznamcha No.12 regarding the facts. Copy of the Roznamch Mad No. 10 and 12 are attached as annexure.....C & D.
6. That when the appellant informed the high ups regarding misbehavior and ill discipline of the above mentioned officials, the above named officials filed complaint against the appellant with the baseless allegations. That the respondent No.3 instead of taking over action against the above named officials issued impugned order dated 26.10.2022 whereby major penalty of reduction in rank has been awarded upon the appellant without any fault on the part of appellant. Copy of the impugned order is attached as annexure..... E.
7. That appellant feeling aggrieved from the impugned order dated 26.10.2022 filed departmental appeal before the respondent No.2 but the same has been rejected vide impugned appellate order dated 18.11.2022 on no good grounds. That against the impugned appellate order dated 18.11.2022; the appellant preferred revision petition before the respondent No.1 but no reply

has been received so far. Copies of the departmental appeal, rejection order and revision petition are attached as annexure .....F, G & H.

8. That appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned orders dated 26.10.2022 and 18.11.2022 are against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondent department acted in arbitrary and malafide manner while issuing the impugned orders dated 26-10-2022 and 18-11-2022.
- D- That no charge sheet and statement of allegations have been issued nor has any show cause notice been served upon the appellant before issuing the impugned order dated 26-10-2022.
- E- That no chance of personal hearing/defense has been provided to the appellant before issuing the impugned order 26-10-2022, which is mandatory as per law and rules ibid.
- F- That no opportunity of cross examination has been given to the appellant before issuing the impugned order dated 26.10.2022.
- G- That no regular inquiry has been conducted in the matter before issuing the impugned order dated 26.10.2022 which is mandatory as per judgment of the apex court before taking punitive action against the civil servant.
- H- That the appellant informed the higher authorities regarding the ill-discipline and misbehavior of the officials concerned for the maintaining of discipline of the force but inspite of that the authorities punished appellant with major penalty which is not tenable in the eye of law.
- I- That the impugned order dated 26.10.2022 is violative of the principle of natural justice, hence not tenable and liable to be set.
- J- That the appellant seeks permission to advance any other ground at the time of hearing.

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

APPELLANT

*Atta Muhammad*  
ATTA MUHAMMAD

THROUGH: *Mir Zaman Safi*

MIR ZAMAN SAFI

&

ABDULLAH KHAN KHATTAK

ADVOCATES

**CERTIFICATE:**

It is, certified that no other earlier appeal was filed between the parties.

*Mir Zaman Safi*  
DEPONENT

**LIST OF BOOKS:**

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO. \_\_\_\_\_/2023

**ATTA MUHAMMAD**

**VS**

**POLICE DEPTT:**

**AFFIDAVIT**

I **Mir Zaman Safi**, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

**MIR ZAMAN SAFI**  
Advocate  
High Court, Peshawar



انٹرنیشنل ایئر لائنز

A-6

آئیل آف پاکستان

کونگارٹ کے اڈے پر ایئر لائنز کے پرواز کے بارے میں معلومات کے لئے  
11C  
170

بکس نمبر

آئیل آف پاکستان

Ad

mm PL 3.4

26-06-022

M. A.

فصل نو ششم

کتابخانه (کتابخانه)

26-06-022

B-7

کتابخانه (کتابخانه) 26-06-022

کتابخانه (کتابخانه) 26-06-022

کتابخانه (کتابخانه) 26-06-022

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کتابخانه (کتابخانه)

mm PL 34  
26-06-022

M. [Signature]

رشتنی التامل زون

سلسلہ نوٹس

8 - C

تفلیس 10 روزنامہ 09/07/22

مرہم ابوورث

عطاء محمد خان SI وقت 13:15 بجے 27/7 درجہ اس وقت  
روزنامہ پبلشنگ لیا گیا اور اس وقت 27/7 درجہ اس وقت  
مرات 6، 7، 8، 9 گیارہ بجے تک عدم موجودگی کے لئے وزیر تقدیر کو  
پایا گیا کہ روزنامہ پبلشنگ لیا گیا اور اس وقت 27/7 درجہ اس وقت  
میں کسی نے تبدیل لیا ہے یہ وہی روزنامہ نہیں ہے جس سے  
آریا تھا جس سے کسی نے بدلتی صاف کہا ہے بحال ہے 26/6 کو  
میں نے محمد اسحاق HC کو بطور قاری کھانڈ ڈیوٹی کیلئے عسکری سمیٹ  
فیلڈی روانہ کیا تھا جس نے انکار کر کے بحال ہے 9 روزنامہ 26/6 کو  
رہائی تھی جس کو اسرار مالائی حضرت میں ارسال کی جگہ تھی تاکہ  
کے خلاف رشتہ شدہ ابوورث و دیگر اندراجات روزنامہ پبلشنگ لیا گیا اور  
کسی نے بدلتی طور پر تبدیل لیا ہے و بحال ہے پولیس نے رشتہ شدہ  
میں سے موبائل فون میں موجود ہے اور اس کے بعد ابوورث  
اور دیگر اندراجات قبضہ کرنے کے لئے مشورہ کیا گیا اور  
ریکارڈ ختم کرنے کے متعلق ملو عدم موجودگی میں موجودہ افسار  
بہتر وضاحت کر سکتے ہیں۔ انکار اسرار مالائی حضرت میں ارسال کی  
جگہ تھی۔

مرہم عالی

نقل بحال ہے

MM PL 13

02-07-022

Handwritten signature

Sik Journal  
Date  
13  
02-07-022

**BETTER COPY OF PAGE-11**

**OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT  
KHYBER PAKHTUNKHWA POLICE  
CENTRAL POLICE OFFICES S.A.Q ROAD, PESHAWAR CANTT**

No. 8720-27/R

Dated Peshawar at 26/10/2022

**ORDER**

This office order will dispose-off the departmental proceedings against SI Atta Muhammad No. 96/MR on the charges/allegations that he while posted at Rashakai Economic Zone, District Nowshera, lodged false & baseless allegations against his seniors in the daily dairy for blackmailing them, misbehaved with his senior officers and by passed chain of command.

2. In this regard, proper departmental proceedings was initiated against him, as he was issued charge sheet vide Endst: No. 6484/R, dated 05.09.2022 & Amir Hussain SP SSU (CPEC), Mardan Region was nominated as enquiry officer to conduct inquiry into the matter, who after fulfilling all codal formalities submitted his findings report, wherein he reported that charge sheet alongwith summary of allegations were served upon him to which he replied. Furthermore, the EO also recorded the statements of Inspector Muhammad Tahir Khan and Mr. Saif Ullah Anjum the then DSP SSU (CPEC), Mardan region. The delinquent SI was also heard in person y the EO during the course of inquiry. The EO further reported his reply was not found satisfactory & based on lies. Thus, the EO found him guilty of the charges leveled against him & recommended him for major punishment.

3. Keeping in view of the above facts, as well as material available on the record and recommendation of the enquiry officer, the above named SI is found guilty of the above mentioned charges leveled against him, thus his this act is against the law/rules and liable to be punished under Police Rules 14-8. I, Deputy Commandant SSU (CPEC), being the competent authority in the exercise of powers vested to me under section 4(b) of Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014) hereby awarded him the Major Punishment of "Reduction in Rank" from SI to ASI with immediate effect.

(ZAIB ULLAH KHAN)  
Dy: Commandant SSU (CPEC)  
Khyber Pakhtunkhwa, Peshawar

**OB No. 735**

**Dated: 26.10.2022**

Copy forwarded to all concerned.

OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT (SSU)  
KHYBER PAKHTUNKHWA POLICE

CENTRAL POLICE OFFICERS SAQ ROAD TEMISSARCANET (PH 091 9211036)

722-11/ R.

Dated Peshawar, 21/10/2022



E-11

ORDER

1. This office order will dispose-off the departmental proceedings against SI AHA Muhammad No. 96/MIR on the charges/allegations that he while posted at Rajhal Economic Zone, District Nowshera, lodged false & baseless allegations against his seniors in the duty unit for blackmailing them, misbehaved with his senior officers and bypassed chain of command.

2. In this regard, proper departmental proceedings were initiated against him and issued charge sheet vide Indst: No. 6484 R, dated 05/09/2022 & Mr. Amir Hussain SP SSU (CPEC), Mardan Region was nominated as enquiry officer to conduct inquiry into the matter, he after fulfilling all Codal formalities submitted his findings report, wherein he reported that charge sheet alongwith summary of allegations were served upon him to which he replied. Furthermore, the EO also recorded the statements of Inspector Muhammad Fahir Khan and Mr. Saif Ullah Anjum the then DSP SSU (CPEC), Mardan region. The delinquent SI was also heard in person by the EO during the course of inquiry. The EO further reported his reply was not found satisfactory & based on lies. Thus, the EO found him guilty of the charges leveled against him & recommended him for major punishment.

3. Keeping in view of the above facts, as well as material available on the record and recommendation of the enquiry officer, the above named SI is found guilty of the above mentioned charges leveled against him, thus his this act is against the law/rules and liable to be punished under Police Rules 14-8, 1, Deputy Commandant SSU (CPEC), being the competent authority in the exercise of powers vested to me under section 4(b) of Khyber Pakhtunkhwa, Police Rules 1973 (amended in 2014) hereby awarded him the Major Punishment of "Reduction in rank" from SI to ASI with immediate effect.

(ZAIB ULLAH KHAN)<sup>SP</sup>  
Dy: Commandant SSU (CPEC),  
Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded for information to the:

1. Regional Police Officer, Mardan Region.
2. PSO to Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
3. SPS North, South, Admin and Mardan Region SSU (CPEC).
4. PSO to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
5. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
6. Accountant, SRC, EC SSU (CPEC), Khyber Pakhtunkhwa Peshawar.

Dry No 1719  
28/1/22

F-12

To,

The Commandant, SSU (CPEC),  
Khyber Pakhtunkhwa, Peshawar.

Subject:

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED  
ORDER DATED 26.10.2022 WHEREBY MAJOR PENALTY OF  
REDUCTION IN RANK HAS BEEN IMPOSED UPON THE  
APPELLANT**

Respected Sir:

With due respect it is stated that the appellant is the employee of Police Department and presently serving as SI No.96/MR SSU (CPEC) under your kind control quite efficiently and upto the entire satisfaction of his superiors.

That during the entire service career the appellant performed his duties with honesty, whole heartedly and with all zeal and zest and there is no complaint whatsoever been received to the high ups against the appellant.

That the appellant while serving as Sub Inspector No.104 at Mardan Region has been transferred and posted to Special Security Unit (CPEC Khyber Pakhtunkhwa vide order dated 15.02.2021. That after arrival the appellant started his duty at the station concerned with honesty and wholeheartedly while some officials were using misbehave with the appellant and were not willing to follow the orders being incharge of the platoon.

That the appellant registered roznamcha in the daily register regarding mis-behave and not following the orders of the incharge and as such they have been made an unlawful group by performing their duties on their own wishes. That the appellant informed the high ups regarding the above mentioned act of the officials.

That it is pertinent to mention here that the officials mentioned above on the basis of malafide intention made some baseless allegations of logged false & baseless allegations against the senior officials in the daily diary. That the authority concerned on the basis of such baseless allegations conducted departmental inquiry against the appellant and issued charge sheet alongwith summary of allegation to the appellant. That the appellant submitted detail reply of the charge sheet alongwith documentary proofs before the inquiry officer and denied all the allegations leveled against him.

That during the course of inquiry the appellant submitted all documentary proofs before the inquiry officer and denied the allegations leveled against him but inspite of that the authority concerned transferred the

**BETTER COPY OF PAGE-14**

**OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT  
KHYBER PAKHTUNKHWA POLICE  
CENTRAL POLICE OFFICES S.A.Q ROAD, PESHAWAR CANTT**

No. 9697-99/EC,

Dated Peshawar at 18/11/2022

**ORDER**

This office order will dispose of the formal departmental appeal preferred by ASI Atta Muhammad No. 96/MR of Special Security Unit (CPEC) against the order of Dy: Commandant SSU (CPEC), wherein he was awarded major punishment of 'Reduction in Rank' from SI to ASI. The applicant was proceeded against on the allegations that he logged false and baseless allegations against his seniors in the daily diary register for blackmailing them, misbehaved with his seniors and by passed chain of command.

In this regard, a proper departmental inquiry was initiated against him, as he was issued charge sheet alongwith summary of allegations and Mr. Amir Hussain SP SSU (CPEC), Mardan was nominated as enquiry officer to unearth the actual facts. After completion of inquiry the EO submitted his findings, wherein he reported that the statement of ASI Atta Muhammad and Inspector Muhammad Tahir Khan alongwith the then DSP Mardan Region Mr. Saif Ullah Khan was record. The EO found him guilty of the charges leveled against him and recommended him for major punishment.

In the light of recommendation of enquiry officer and other material available on the record, he was awarded major punishment of "Reduction in Rank" from SI to ASI vide order No. 2720-27/EC, dated 26.10.2022.

Feeling aggrieved against the impugned order of Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 15.11.2022.

During the course of personal hearing, the applicant failed to prove himself innocent. From perusal of enquiry file it has been found that the allegations were fully established against him by the Enquiry Officer during the course of enquiry. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on findings narrated above, I, Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

**(MUHAMMAD ZAFAR ALI)**  
COMMANDANT  
Special Security Unit (CPEC)  
Khyber Pakhtunkhwa, Peshawar



OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT (SSU)  
KHYBER PAKHTUNKHWA POLICE



CENTRAL POLICE OFFICERS, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-9214050)

2720-27/EC

dated Peshawar the 12/11/2022.

G-14

ORDER

This order will dispose of the formal departmental appeal preferred by ASI Atta Muhammad No. 96 MR of Special Security Unit (CPEC) against the order of Dy: Commandant SSU (CPEC), wherein he was awarded major punishment of "Reduction in Rank" from SI to ASI. The applicant was proceeded against on the allegations that he logged false & baseless allegations against his seniors in the daily dairy register for blackmailing them, misbehaved with his seniors and bypassed chain of command.

In this regard, a proper departmental inquiry was initiated against him as he was issued charge sheet along with summary of allegations and Mr. Amir Hussain SP SSU (CPEC), Mardan was nominated as enquiry officer to unearth the actual facts. After completion of enquiry, the EO submitted his findings, wherein he reported that the statement of ASI Atta Muhammad and Inspector Muhammad Tahir Khan alongwith the then DSP Mardan Region Mr. Saif Ullah Khan was correct. The EO found him guilty of the charges leveled against him and recommended him for major punishment.

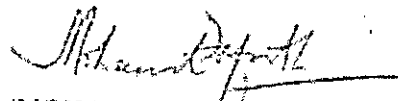
In the light of recommendation of enquiry officer and other material available on the record, he was awarded major punishment of "Reduction in Rank" from SI to ASI vide order No. 2720-27/EC, dated 26.10.2022.

Feeling aggrieved against the impugned order of Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 15.11.2022.

During the course of personal hearing, the applicant failed to prove himself innocent. From perusal of enquiry file it has been found that the allegations were fully established against him by the Enquiry Officer during the course of enquiry. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on findings narrated above, I, Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

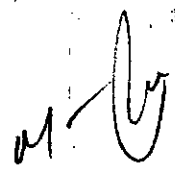
Order announced.

  
(MOHAMMAD ZAFAR ALI) SP  
COMMANDANT,  
Special Security Unit (CPEC),  
Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded for information to the:

1. Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. ASI Atta Muhammad No. 96 MR.

12-11-22





H-15

10881/8B - آئی سی سی ضلع خدیجہ مورخہ 01

جناب صاحب  
گزارش کی جاتی ہے کہ سائل کا والد صاحب محکمہ پولیس میں بہ عہدہ ASI ضلع مردان میں تعینات تھا جو مورخہ 13/05/2004 کو ضلع مردان میں شہید ہو چکا ہے جس کے بعد سائل مورخہ 02/08/2010 کو شہید کوٹہ کے پیش نظر بہ عہدہ PASI محکمہ پولیس میں بھرتی ہو چکا ہے سائل موجودہ وقت میں سی پیک SSU میں تعینات تھا اور سائل کو حکمانہ انوائزی کے پیش نظر بحوالہ حکم نمبر 27-8720-26/10/2022 مورخہ جاریہ ڈپٹی کمائنٹ صاحب SSU پشاور عہدہ سب انسپکٹری سے بہ عہدہ اسسٹنٹ سب انسپکٹر تنزیلی کی گئی ہے۔ اسی طرح بحوالہ حکم نمبر 12-2408-11/11/2022 مورخہ جاریہ کمائنٹ صاحب SSU پشاور نے سائل کو ضلع اپر کوہستان تبدیل کرنے اور ایک انکریمینٹ ایک سال تک Stop کیا ہے۔

سائل نے جناب کمائنٹ صاحب کو عہدہ کی بحالی کی خاطر رقم درخواست کر کے تاہم بحوالہ حکم نمبر 99-9697-18/11/2022 مورخہ جاریہ جناب کمائنٹ صاحب SSU پشاور سائل کے رقم درخواست کو منسوخ کیا گیا ہے جو کہ سائل کے مستقبل پر اثر انداز ہونے کے ساتھ ساتھ سائل گھر کے دیگر افراد کے لئے بھی پریشانی کا باعث ہے۔

استدعا ہے کہ سائل کے مستقبل، گھریلو زندگی اور خاندان کے افراد کی پریشانی کو مد نظر رکھتے ہوئے سائل کے حال پر رقم فرمائے کہ سائل کو مکمل مراعات کے ساتھ اپنے اصل عہدہ سب انسپکٹری پر بحال کرنے کی حکم صدور فرمائی جائے سائل اور سائل کے خاندان کے افراد کا گورہیں گے۔

INVOICE OF THE DEPT.	WAR
(No. ....)	
No. S. 1705 / 22	
Dated 30 / 11 / 22	

الغرض!

تابع حکم واجام عطاء ASI/96MR متعینہ ضلع اپر کوہستان سی پیک SSU

مورخہ 18/11/2022

0345-2172029

16102-1159793-5

SS  
29/11/22

San Francisco  
11/11/2022

WAKALAT NAMA

BEFORE THE Khyber Pakhtunkhwa Service  
Tribunal, Peshawar

OF 2023

Atta Muhammad

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Police Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We Atta Muhammad

Do hereby appoint and constitute **MIR ZAMAN SAFI**,  
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 cost. I/we authorize the said  
Advocate to deposit, withdraw and receive on my/our behalf all  
sums and amounts payable or deposited on my/our account in the  
above noted matter.

Dated. / /2023

Atta Muhammad  
CLIENT

Mir Zaman Safi  
ACCEPTED  
MIR ZAMAN SAFI  
ADVOCATE

OFFICE:

Room No.6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, G.T Road,  
Hashtnagri, Peshawar.  
Mobile No.0333-9991564  
0317-9743003

Abdullah Advocate

4-15

حضرت صاحب آئی جی جی صاحب خیر کھٹو صاحب  
10881/8B

جناب عالی!

گزارش کی جاتی ہے کہ سائل کا والد صاحب محکمہ پولیس میں بہ عہدہ ASI ضلع مردان میں تعینات تھا جو مورخہ 13/05/2004 کو ضلع مردان میں شہید ہو چکا ہے جس کے بعد سائل مورخہ 02/08/2010 کو شہید کوٹہ کے پیش نظر بہ عہدہ PASI محکمہ پولیس میں بھرتی ہو چکا ہے سائل موجودہ وقت میں سی پیک SSU میں تعینات تھا اور سائل کو حکمانہ انوائزی کے پیش نظر بحوالہ حکم نمبر 27-8720 مورخہ 26/10/2022 جاریہ ڈپٹی کمائنٹ صاحب SSU پشاور عہدہ سب انسپکٹری سے بہ عہدہ اسٹنٹ سب انسپکٹر تنزلی کی گئی ہے۔ اسی طرح بحوالہ حکم نمبر 12-2408 مورخہ 11/11/2022 جاریہ کمائنٹ صاحب SSU پشاور نے سائل کو ضلع اپر کوہستان تبدیل کرنے اور ایک انکریمنٹ ایک سال تک Stop کیا ہے۔

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Office of the PAF  
Peshawar  
(Specialist)  
No. S. 1705/22  
Date: 20/11/22

الغرض!

تاریخ حکم و احکام عطاء محمد ASI/96MR متعینہ ضلع اپر کوہستان سی پیک SSU

مورخہ 18/11/2022

0345-2172029

16102-1159793-5

SS  
29/11/22

SM  
Forwarded  
11/11/2022  
11.02.22

WAKALAT NAMA

BEFORE THE Khyber Pakhtunkhwa Service  
Tribunal, Peshawar

OF 2023

Atta Muhammad

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Police Deptt.

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