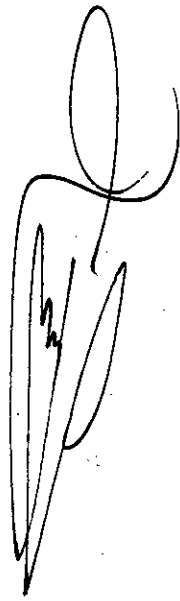


. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	15.05.2015	<p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</p> <p style="text-align: center;">Service Appeal No. 547/2013,</p> <p>Asad Mehmood, Inspector Police, presently working and posted at Directorate of Counter Terrorism (DCT) Special Branch, Peshawar Versus Provincial Police Officer, Peshawar etc.</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER.-</u> Appellant with counsel (Mr. Usman Khan Turlandi, Advocate) and Mr. Muhammad Jan, Govt. for the respondents present.</p> <p>2. Appellant Asad Mahmood, Inspector Police Khyber Pakhtunkhwa is aggrieved with his placement in the seniority list. We would like to reproduce the prayer portion of his appeal, which is as below:-</p> <p style="padding-left: 40px;">"On acceptance of this service appeal, the respondents may please be directed to accord proper correction for granting the appellant his due seniority by keeping him at the bottom of seniority list of Sub Inspectors being transferred from Baluchistan Police to Khyber Pakhtunkhwa Police w.e.f. 07.09.1998 instead of 09.02.2004 and the grievance of the appellant be redressed accordingly."</p> <p>3. Relevant facts as revealed from record, in brief for are that the appellant was enlisted in the Baluchistan Police as probationer ASI on 23.4.1987. (the date as shown in the written reply of the respondents), the appellant was transferred</p>

from Baluchistan Police to Khyber Pakhtunkhwa Police and posted in the Frontier Reserve Police, Peshawar. Later on 01.3.1999 he was transferred to Directorate of Counter Terrorism (DCT) on deputation basis. It is the contention of the appellant that on his transfer in the year, 1998 from Baluchistan to Khyber Pakhtunkhwa police, his name should have been placed at the bottom of the seniority list of Sub Inspectors. Unfortunately Chief Capital City Police Officer, Peshawar vide his order dated placed his name in the seniority list of Sub Inspectors w.e.f. 09.2.2004 instead of in the year, 1998.



4. It is the contention of the learned counsel for the appellant that due and deserving place in the seniority list has been refused to the appellant by the respondent-department as a result of which, the appellant has been deprived of his legal rights. It was further submitted that some colleagues of the appellant like Zulfiqar Jadoon had also been transferred from Baluchistan to the Khyber Pakhtunkhwa police alongwith the appellant to whom unlike the appellant has been given his due seniority. The learned counsel for the appellant further stressed that the appellant is the victim of discrimination and his junior colleagues were made senior to him and then promoted. He requested that the appeal may be accepted.

5. The learned Senior Government Pleader resisted this appeal on the ground that order dated 14.5.2007 was passed by the CCPO, Peshawar but he has not been made a party, that the

appeal is badly time barred. He requested that the appeal may be dismissed.

6. We have heard arguments of the learned counsel for the parties and have perused the record with their assistance.

7. On perusal of the impugned order dated 14.5.2007 seniority of the appellant has been determined w.e.f. 09.2.2004. If the appellant had come from Baluchistan to Khyber Pakhtunkhwa Police in the year, 1998, the reason should have been given by the competent authority as to why seniority of the appellant is being determined w.e.f. 09.2.2004 instead of 07.09.1998 in contravention of rule 8(2) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. For ready reference, we would like to reproduce sub para-2 of Rule 8 of the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 which is as follows:-

8. Inter-Provincial Transfer,----(2) A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purposes of determining his seniority viz-a-viz other members borne on the cadre.”

8. The record shows that the Provincial Police Officer alongwith AIG (Headquarters) and D.I.G DCT/Special Branch of Khyber Pakhtunkhwa have been made party. The Tribunal is of the considered opinion that in the presence of these respondents, relief can be granted to the appellant and thus the appeal cannot be declared so bad for non-joinder of CCPO, Peshawar as necessary party. It is also evident that it is a

continuous wrong and the appellant cannot be ousted on the ground of limitation.

9. For the reasons stated above, the Tribunal is of the considered view to remit this appeal to the respondent-department to decide the same in the light of Rule-8(2) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and to give the appellant his due/deserving place in the seniority list. The appeal is allowed accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

15.5.2015



(ABDUL LATIF)
MEMBER



(PIR BAKHSH SHAH)
MEMBER

08.09.2014

Appellant with counsel and Mr. Muhammad Jan, GP
with S.Amir Abbas, SI(L) for respondents present. The learned
Member is on leave. To come up for the same on 23.1.2015.


MEMBER

23.1.2015

Appellant in person and Mr. Muhammad Jan, GP with
Syed Aamir Abbas, Inspector (Legal) for the respondents present.
Appellant requested for adjournment as his counsel was reported to
be busy before the august Supreme Court of Pakistan. Therefore,
case to come up for arguments on 15.5.2015.


MEMBER

547/13

13.3.2014

Appellant in person and Mr. Usman Ghani, Sr.GP with Syed Amir Abbas, Inspector (Legal) for the respondents present and requested for time. To come up for written reply on 15.4.2014.


MEMBER

15.4.2014.

Appellant in person and Mr. Muhammad Jan, GP with Syed Aamir Abbas, Inspector (Legal) for the respondents present and reply filed. Copy handed over to the appellant. To come up for rejoinder on 9.5.2014.


MEMBER


MEMBER

09.5.2014

Appellant with counsel and AAG with Syed Aamir Abbas, Inspector (Legal) for the respondents present. Rejoinder received and copy handed over to the learned AAG. To come up for arguments on 3.7.2014.


MEMBER


MEMBER

03.07.2014

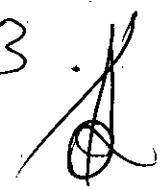
Appellant with counsel and Mr. Muhammad Jan, GP with Ikram Shah, H.C for the respondents present. The learned GP needs time. To come up for arguments on 08.09.2014.


MEMBER


MEMBER

Appeal No. 547/2013
Mr. Asad Mehmood

22-10-2013. No one on behalf of the
Appellant present. To come for
PH on 17-12-2013.


(Member)

8. 17.12.2013

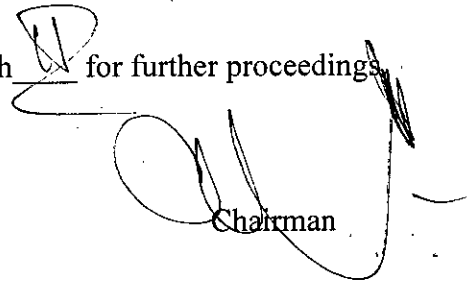
Appellant with counsel present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 14.05.2007, the appellant filed departmental appeal on 12.11.2012, which has not been responded within the statutory period of 90 days, hence the present appeal on 11.03.2013. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 13.03.2014

*Appellant deposited
of process fee & Security
Rs. 1800/- Bank Receipt
attached with file.*


Member

9. 17.12.2013

This case be put before the Final Bench  for further proceedings.


Chairman


3.
7.5.2013

No one is present for the appellant. The learned Member is on leave, the case is therefore, adjourned to 19.6.2013 for preliminary hearing.


Reader.


4.
19.6.2013

Munshi to counsel for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 11.7.2013.


Reader

5.
11.07.2013

No one is present on behalf of the appellant. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013) the case is adjourned on note Reader for proceedings as before on 30.08.2013.


Reader


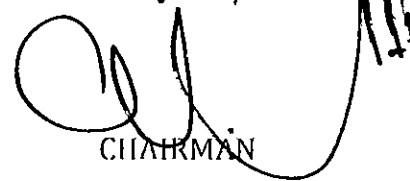
6.
10.08.2013

No one is present on behalf of the appellant. Case is adjourned. To come up for preliminary hearing on 22.10.2013.


Member

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 547/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	18/03/2013	<p>The appeal of Mr. Asad Mehmood resubmitted today by Mr. Muhammad Usman Khan Turlandi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	22-3-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>7-5-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Asad Mehmood received today on 11/03/2013 is returned to the counsel for the appellant with the direction to submit one copy/set of the appeal along with annexures i.e. complete in all respect , with in 10 days.

No. 409 /S.T.

Dt. 12/3 /2013


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR

MR. MUHAMMAD USMAN KHAN TURLANDI.
ADVOCATE PESHAWAR.

①

Before The Khyber Pakhtunkhwa Service Tribunal Peshawar.

In Ref; to S. Appeal No. 547 of 2013.

Inspector Asad Mehmood.....VERSUS..... PPO & others

INDEX

S.No.	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE NO.
1.	Main Service Appeal.	----	1-6
2.	Affidavit.	----	7
3.	Addresses of Parties.	----	8
4.	Arrival Report at CPO Peshawar.	"A"	9-10
5.	Transfer to FRP Peshawar.	"B"	11
6.	Transfer to District Police Peshawar.	"C"	12
7.	Impugned order.	"D"	13
8.	Departmental Appeal.	"E"	14-15
9.	Vokatnama in original.	-----	

APPELLANT.

Through;

Muhammad Usman Khan

Turlandi

Advocate Peshawar.

Asad Zeb Khan

Advocate Peshawar.

Dated 9/03/2013

(Saturday)

Before The Khyber Pakhtunkhwa Service Tribunal Peshawar.

In ref: to Service Appeal No. 547 /2013.

Asad Mehmood, Inspector Police, presently working and posted at Directorate of Counter Terrorism (DCT) Special Branch (SB) Khyber Pakhtunkhwa Peshawar.....APPELLANT

VERSUS

Handwritten: 543, 11-3-13

- 1). Provincial Police Officer Khyber Pakhtunkhwa, Central Police Office (CPO) Peshawar.
- 2). Additional Inspector General of Police/HQrs: Khyber Pakhtunkhwa, Police Line Peshawar.
- 3). Deputy Inspector General of Police Directorate of Counter Terrorism (DCT) Special Branch (SB) Khyber Pakhtunkhwa Peshawar.

.....RESPONDENTS

SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT.AGAINST THE IMPUGNED ORDER BEARING NO. 4673-75/EC-1DATED PESHAWAR 14/05/2007,PASSED ON THE BACK OF THE APPELLANTAND KEEPING HIM UNAWARE WHEREBY HE WAS KEPT AT THE BOTTOM OF SIS ON LIST "E" W.E.09-02-2004 INSTEAD OF 01-01-1998 WHEN HE WAS TRANSFERRED FROM BALUCHISTAN AND ON COMMUNICATION OF THE IMPUGNED ORDER, THE DEPARTMENTAL APPEAL DATED 12-11-2012, FILED BY THE APPELLANT REGARDING CORRECTION IN THE YEAR OF TRANSFER FROM BALUCHISTAN AS 1998 INSTEAD OF 2004, WAS NOT YET RESPONDED.

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PRAYERS:-

On acceptance of this service appeal the Respondents may please be directed to accord proper correction for granting the appellant his due seniority by keeping him at the bottom of seniority list of Sub-Inspectors being transferred from Baluchistan Police to KPK Police w.e.f. 07-09-1998 instead of 09-02-2004 and the grievances of the appellant be redressed accordingly.

Respectfully Sheweth;

- 1) That the Appellant was enlisted in Baluchistan Police Department as probationer ASI in the year 1989 and later on he was promoted to the rank of sub-Inspector in the year 1994 and his name was brought on list "E".
- 2) That on 07-09-1998 the appellant along with his other colleague namely Zulfiqar Jadoon were transferred from Baluchistan to the KPK Police Peshawar and accordingly the appellant submitted his arrival report (Annexure "A") at CPO Peshawar.
- 3) That thereafter the appellant was posted to FRP Peshawar (Annexure "B") and on 05-04-1999 the appellant was transferred on permanent basis to district Police Peshawar (Annexure "C") but it was very astonishing that the appellant being personal of Peshawar Police, was not allotted his belt number and was receiving his monthly salary regularly
- 4) That at the time of his inter provincial transfer, the appellant was required to have been placed at the bottom of seniority list of sub inspector in the year 1998 but his name was placed at the bottom of the seniority list of sub inspector w.e.f. 09-02-2004 vide impugned order dated 14-05-2007. (Copy of the impugned order is annexure "D").

- 5) That the appellant was kept unaware regarding the impugned order which was passed on his back and no copy was delivered/endorsement to him.
- 6) That the appellant while aggrieved of the discrimination in service and depriving him of his legal right, filed departmental appeal against the impugned order for the redressal of his grievances and tabled before the respondent No.1 vide covering letter dated 12-11-2012. (Copy of the departmental appeal supported by covering letter is annexure "E").
- 7) That the respondents did not bother to consider the grievances of the petitioner in either way while the appellant waited till the expiry of the stipulated period but his appeal has not yet been responded.
- 8) That in the given circumstances the appellant prefers this service appeal for the redressal of his grievances on the following amongst other grounds inter-alia.

Grounds.

- a) That the Appellant has a proper recurring cause of action and is suffering from continuous legal injury and his grievances should have been redressed by the Appellate Authority and by not doing so, the impugned order is illegal, unlawful, without lawful authority, without jurisdiction, against the law on the subject and against the norms of natural justice and liable to be declared as such.
- b). That at the time of his inter provincial transfer it was required to have been placed at the bottom of seniority list of sub inspector in the year 1998 but his name was placed at the bottom of the seniority list of sub inspector w.e.f. 09-02-2004, hence by no stretch of imagination the impugned order is maintainable and alternatively is liable to be set-aside.

- c). That non correction/rectification of the wrong entry by placing the name of the appellant at the bottom of seniority list of SIs in the year 2004 instead of 1998 is illegal, unlawful, without lawful authority and unconstitutional as the appellant was transferred from Baluchistan Police to KPK Police in the year 1998 and as per service law, the name of the appellant should have been placed at the bottom of seniority list of his colleagues prepared in the year 1998 and not the year 2004.
- d). That the colleague of the appellant namely Zulfiqar Jadoon who was also transferred from Baluchistan Police along with the appellant in the year 1998 was promoted to the rank of Inspector on 09-01-2006 while the appellant was promoted to the rank of Inspector on 23-10-2008.
- e). That there is no legal bar as to the correction in concerned seniority list of SIs by placing his name at its bottom and this august Tribunal has the jurisdiction to adjudicate upon the matter.
- f). That valuable right was accrued to the appellant whereas his fundamental valuable rights have been encroached by the respondents No.2 & 3 on their personal whims & wishes and such encroachment is hit by the command of the constitution of the Islamic Republic of Pakistan 1973.
- g). That the Appellant has vested valuable right accrued to him regarding proper correction as prayed for in his service record and violation thereof would hit the command of constitution and such fundamental rights could not be taken away with a single stroke of pen.
- h). That further submission will be advanced at the time of hearing the Appellant at the bar.

It is therefore, humbly prayed, that on acceptance of this appeal the Respondents may please be directed to accord

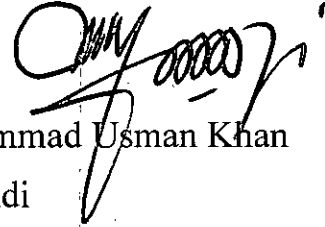
6

proper correction for granting the appellant his due seniority by keeping him at the bottom of seniority list of Sub-Inspectors being transferred from Baluchistan Police to KPK Police w.e.f. 07-09-1998 instead of 09-02-2004 and the grievances of the appellant be redressed accordingly and or any other remedy if available may also be extended in favour of the appellant.



APPELLANT

Through;



Muhammad Usman Khan

Turlandi

Advocate Peshawar

Dated 09/03/2013
(Saturday)

Asad Zeb Khan

Advocate Peshawar.

Before The Khyber Pakhtunkhwa Service Tribunal Peshawar.

In Ref; to S. Appeal No. _____ of 2013.

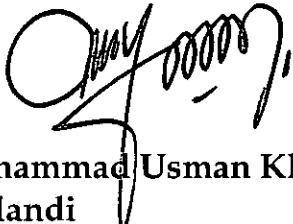
Inspector Asad Mehmood.....VERSUS..... PPO & others

AFFIDAVIT.

I, Inspector Asad Mehmood DCT (SB) Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanying Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been kept secret or concealed therein from this august Tribunal.

IDENTIFIED BY ;


DEPONENT


Muhammad Usman Khan
Turlandi
Advocate Peshawar



Before The Khyber Pakhtunkhwa Service Tribunal Peshawar.

In Ref; to S. Appeal No. _____ of 2013.

Inspector Asad Mehmood.....VERSUS..... PPO & others

ADDRESSES OF PARTIES

APPELLANT

Asad Mehmood, Inspector Police, presently working and posted at Directorate of Counter Terrorism (DCT) Special Branch (SB) Khyber Pakhtunkhwa Peshawar.

VERSUS

RESPONDENTS.

- 1). Provincial Police Officer Khyber Pakhtunkhwa, Central Police Office (CPO) Peshawar.
- 2). Additional Inspector General of Police/HQrs: Khyber Pakhtunkhwa, Police Line Peshawar.
- 3). Deputy Inspector General of Police Directorate of Counter Terrorism (DCT) Special Branch (SB) Khyber Pakhtunkhwa Peshawar.


APPELLANT

Through;



Muhammad Usman Khan
Turlandi

Advocate Peshawar

Dated ⁰⁹ /03/2013

(Saturday)

کریٹریٹ میں ایسٹیبلیشمنٹ کے لیے ایف۔ پی۔ سی کے لیے ایسٹیبلیشمنٹ

Annexure-A

صوبہ خیبر پختونخواہ کے لیے ایف۔ پی۔ سی کے لیے ایسٹیبلیشمنٹ

ایف۔ پی۔ سی کے لیے ایسٹیبلیشمنٹ کے لیے ایف۔ پی۔ سی کے لیے ایسٹیبلیشمنٹ

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No. 17386 dated 7/7/19

Forwarded in original alongwith its copy to the concerned F.R.O. for disposal

with the office no. 15/10/19

dated 08/08/19

ATTESTED TO BE TRUE COPY

[Signature]

M. Usman Khan Turlandi
M. A. LL. B. Advocate
Peshawar.

St. 7/7

[Signature]
Police
Wazir

7/8

گورنمنٹ جنرل انسپیکٹر جنرل آف پولیس NWFP پشاور

عنوان: آراء ٹیول رپورٹ

جناب عالی: نزار حسن حیدر صاحب کا متعلق تبادلہ صوبہ بلوچستان کو شیعہ رینج ضلع کپیسین سے صوبہ NWFP پشاور ہونے کے بارے میں 31/8 کو لکھے ہوئے دو پہر صوبہ بلوچستان کو شیعہ رینج سے فارغ ہوا ہوں۔ لکھے نزار نے جائینگ ٹائم حاضر آیا ہوں ریلیونگ اور L.P.C کی کارپیاں لف رپورٹ فراہم کی۔ آراء ٹیول رپورٹ ضلع

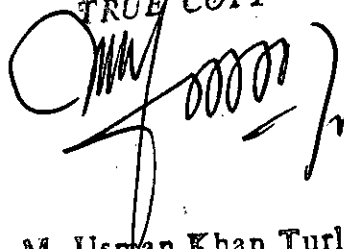
انڈوم 7/98

دستخط انٹرنری

محمد
SI FRP

NO. 17886/E-II dated 07-09-1998

ATTESTED TO BE
TRUE COPY



M. Usman Khan Turlandi
M. A. LL. B Advocate
Peshawar.

(11)

4383
6-8-98, Annexure-B

ORDER

Consequent on his transfer from Balochistan Police, S.I Masad Mehmood Khan is posted to F.R.P/NWFP on the following conditions:-

1. He will accept bottom seniority of S.Is in the N.W.F.P. Police.
2. The Provincial Govt. of Balochistan will pay pension and leave contribution for the period he served in Balochistan.
3. He will not be paid any TA/DA.

FAQIR HUSEAIN
DIG/Hqrs:

For Inspector General of Police,
N.W.F.P., Peshawar.

No. 13787 - 82/E-II. Dated: Peshawar the 1/8/1998.

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

1. The Inspector General of Police, Balochistan w/r to his No. 15183-13188/13(5)/A, dated 9.7.1998.
- ~~2. The Commandant, FRP, NWFP, Peshawar.~~

cy. J. Khan (AKBAR HUSSAIN HAIDRI)
REGISTRAR
For Inspector General of Police,
N.W.F.P., Peshawar.

ATTESTED TO BE
TRUE COPY

M. Usman Khan Turlandi
M. A. LL. B Advocate
Peshawar.

11/11/98
2013

Annexure - C

COPY.

ORDER.

S.I Asad Mehmood Khan of FRP is hereby transferred and posted to Peshawar Range with immediate effect.

FAQIR HUSSAIN
DIG/HQRS:
FOR INSPECTOR GENERAL OF POLICE,
NWFP, PESHAWAR.

NO. 3227-28 /E-II, Dated Peshawar the, 26.2.1999.

Copy forwarded for information and necessary action to the:-

- 1) Commandant, FRP/NWFP Peshawar.
- 2) DIG of Police, Peshawar Range Peshawar.

OFFICE OF THE COMMANDANT FRONTIER RESERVE POLICE, NWFP PESHAWAR.

NO. 1252-55 /EC, Dated Peshawar the, 1-3-1999.

Copy forwarded for information and necessary action to the;-

- 1. Dy:Supdt:of Police, FRP Hqrs:Peshawar.
- 2. Accountant FRP Hqrs:Peshawar.
- 3. SRC FRP Hqrs:Peshawar.
- 4. CC FRP Hqrs:Peshawar.

COMMANDANT
FRONTIER RESERVE POLICE,
NWFP PESHAWAR.

ATTESTED TO BE
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M. Usman Khan Turlandi
M. A. LL. B Advocate
Peshawar.

ORDER .

In pursuance of CPO Memo: No.6383/E-II dated 28.03.2007, the lien of Offg:SI Asad Mehmood presently posted to Motor Way Police is hereby attached with Capital City Police, Peshawar at the bottom of Offg:SI's on list "E" w.e.from 09.02.2004. His name will be placed between the names of SI Muhammad Fazil No.70/P at S/No.355 and SI Safdar Ali No.76/P at S/No.356 in the Seniority List of Offg:SI's of Capital City Police, Peshawar.

He is allotted Capital City Police Peshawar Number 275/P.

2 CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 4673-76/EC-I, Dated Peshawar the, 14/5/2007.

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

1. The Inspector General of Police, National High-way & Motor-way Police, H/No.7, Main Kaghan Road, F-8/5- Islamabad. He may please be infomed accordingly.
2. EC-II Branch, C.C.P., Peshawar.
3. Asstt:Secret, C.C.P., Peshawar.

ATTESTED TO BE
TRUE COPY

[Handwritten Signature]

M. Usman Khan Turlandi
M. LL. B Advocate
Peshawar.

14

From: - The Deputy Inspector General of Police,
DCT, SB: Khyber Pakhtunkhwa,
Peshawar.


To: - The Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

No 4820 /SRC/DCT/SB: Dated Peshawar the 12-11- /2012.

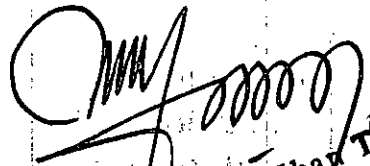
SUBJECT: - REPRESENTATION.

MEMO:

Representation together with other relevant papers in respect of Inspector Assad Mehmood No P/85 of CCP, Peshawar presently on deputation to this Unit requesting therein for his seniority since, 07.09.1998 is submitted herewith for favour of consideration, please.


(DR. ISHTIAQ AHMED) PSP
Deputy Inspector General of Police,
DCT, SB: Khyber Pakhtunkhwa,
Peshawar.

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TRUE COPY


Usman Khan Turlandi
M, A. LL. B Advocate
Peshawar.

(15)

بخدمت جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ، پشاور

متوسط:- جناب DIG/DCT پیشل برانچ، پشاور۔

عنوان:- درخواست برائے حصول سناریائی۔

جناب عالی:

گزارش ہے کہ سائل ضلع پشین صوبہ بلوچستان میں بحوالہ آرڈر نمبری E (2) 3235-86/12 اور بحوالہ آرڈر نمبری 1610-42/(21) محررہ 23-04-1987 کو بطور پرویشنر ASI بھرتی ہوا۔ مورخہ 29-12-1989 کو پولیس ٹریننگ کالج سہالہ سے پرویشنر کورس مکمل کرنے کے بعد مورخہ 22-12-1994 کو بحوالہ آرڈر نمبری E (s) 14197-14206/13 کے تحت E لسٹ پر کنفرم ہو کر بحوالہ آرڈر نمبری E (I) 14509-15/13 مورخہ 29-12-1994 کو سب انسپکٹر کے عہدے پر ترقی ہوئی۔

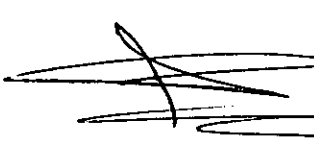
مورخہ 07-09-1998 کو بحوالہ آرڈر نمبری EO 2818-22(13)9 کے تحت سائل اور سائل کے ہمراہ سب انسپکٹر ذوالفقار جدون دونوں صوبہ بلوچستان سے مستقل طور پر تبدیل ہو کر صوبہ خیبر پختونخواہ آئے۔ سائل نے مورخہ 07-09-1998 کو CPO آفس پشاور میں آرائیول رپورٹ دی بعد ازاں سائل کا تبادلہ FRP پشاور میں ہو کر ڈیوٹی سرانجام دیتا رہا۔

مورخہ 05-04-1999 کو بحوالہ آرڈر نمبری 6517/III حسب الحکم جناب انسپکٹر جنرل پولیس KPK ایف آر پی سے پشاور ڈسٹرکٹ پولیس میں پرموٹ ٹرانسفر ہوئی۔ سائل مورخہ 07-09-1998 سے مورخہ 14-05-2007 تک بغیر بلٹ نمبر کے تنخواہ لیتا رہا ہوں۔ بعد میں سائل نے جناب IGP خیبر پختونخواہ کو درخواست دے کر سناریائی کی اپیل کی۔ جس پر عملدرآمد ہوتے ہوئے مورخہ 14-05-2007 کو بحوالہ آرڈر نمبری 4673-75/ECI کے تحت سائل کو سناریائی 2004 سے دی گئی ہے۔ اور بلٹ نمبر 275/P الاٹ کیا گیا تھا۔

جناب والا: عرض گزار ہوں کہ بحوالہ آرڈر نمبری I-SoCox M-1315-95 SI No SXJAD مورخہ 10-01-98 کے تحت میرے ساتھ سب انسپکٹر ذوالفقار جدون بھی پرموٹ ٹرانسفر کروا کر صوبہ بلوچستان کو سب سے صوبہ خیبر پختونخواہ ضلع ایبٹ آباد آیا۔ ہم دونوں SI ایک ہی آرڈر پر صوبہ بلوچستان سے صوبہ خیبر پختونخواہ آئے۔ عرض گزار ہوں کہ SI ذوالفقار جدون جو کہ بحوالہ آرڈر نمبری EI 43-437 مورخہ 09-01-2006 کو انسپکٹر کے عہدے پر پرموٹ ہو چکا ہے۔ جبکہ سائل آرڈر نمبری EI 9-28606-28607 مورخہ 23-10-2008 کو انسپکٹر کے عہدے پر پرموٹ ہوا۔ (جملہ آرڈرز کی نقولات ہمراہ لف درخواست ہیں)

جناب والا: عرض گزار ہوں کہ سائل نے مورخہ 07-09-1998 کو پشاور CPO میں آرائیول رپورٹ دی تھی جو کہ اسی دن سے سناریائی شروع ہوئی تھی جبکہ سائل کو 07-09-1998 سے سناریائی دینے کے بجائے 2004 سے سناریائی دی گئی ہے۔ جو کہ سائل کے ساتھ نا انصافی اور حق تلفی ہے۔ سائل تقریباً 07 سال تک اپنے جائز حقوق سے محروم رہا ہے اور سائل کو سناریائی نہیں ملی تھی جس سے سائل کو پرموشن میں بہت نقصان ہوا ہے۔ جناب والا: بذریعہ درخواست ہدا استدعا ہے کہ سائل کو مورخہ 07-09-1998 سے سناریائی دے کر سناریائی کے مطابق ترقی یاب کرنے کا حکم صادر فرمائیں۔ سائل انصاف پروری کا دعا گور ہے گا۔

ATTESTED TO BE TRUE COPY



اسد محمود خان P/85- انسپکٹر



M. Usman Khan Turlandi
M. A. L. B Advocate
Peshawar.

DCT: پیشل برانچ پشاور۔

متعینہ



Service Appeal, 2013

ایسٹریٹ	2 منجانب	مورخہ
PPD وغیرہ	بنام	مقدمہ
ریسپانڈنٹ		دعویٰ
		جرم

اسد محمود خان
 ایسٹریٹ پولیس
 SB (DCT)
 KPK مارٹ
 ایسٹریٹ
 باعث تحریر آنکہ

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

آن مقام مارٹ کیلئے محمد عثمان خان تندرستی اینڈ اسٹریٹریٹ خان ایڈووکیٹ

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 ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و زور پیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یا پٹرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تارتخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Attested & Accepted
 2013
 Asad Zebkhan
 Advocate

الرقوم
 مارٹ

Asad Zebkhan
 Advocate

KPK ST
 Asad Zebkhan
 Advocate

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 547/2013

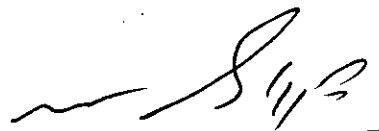
Inspector Asad Mehmood, presently working and posted at CTD, Khyber Pakhtunkhwa, Peshawar.Appellant

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. Addl: Inspector General of Police/Hqrs:, Peshawar.
3. Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, PeshawarRespondents

AUTHORITY LETTER

Syed Aamir Abbas, Inspector Legal, CTD, Khyber Pakhtunkhwa, Peshawar is hereby authorized to appear on behalf of the Respondents No.1, 2 & 3 before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar. He is also authorized to submit all required documents and replies etc. pertaining to the appeal through the government pleader.



**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(RESPONDENT No. 1 & 2)**



**Deputy Inspector General of Police, CTD,
Khyber Pakhtunkhwa, Peshawar.
(RESPONDENT No. 3)**

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 547/2013

Inspector Asad Mehmood, presently working and posted at CTD, Khyber Pakhtunkhwa, Peshawar.Appellant

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. Addl: Inspector General of Police/Hqrs:, Peshawar.
3. Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, PeshawarRespondents

WRITTEN REPLY BY THE RESPONDENTS

Preliminary Objections

01. That the appellant has not come with clean hands to this honorable tribunal.
02. That the appellant has got no cause of action and locus standi.
03. That appeal in the present form is legally defective.
04. That the appeal is barred by law and limitation.
05. That the appellant concealed material facts from honorable tribunal.
06. That the appeal is bad due to non joinder of necessary parties.

FACTS:

1. Incorrect, the appellant was enlisted as ASI in Balochistan Police on 23.04.1987 instead of 1989, according to his service record, he was promoted to the rank of Sub Inspector in the year 1994.
2. Incorrect, the appellant was transferred from Baluchistan Police to KPK Police on 09.07.1998, instead of 07.09.1998.
3. Incorrect, the appellant was posted in Frontier Reserve Police (FRP) Peshawar on transfer from the Province of Baluchistan and later on transferred and posted to Peshawar range on **01.03.1999**, instead of **05.04.1999**, from where he was retransferred to DCT now CTD on deputation basis. Moreover, the appellant belongs to Peshawar range but he did not implead the Capital City Police Officer, as respondent in his service appeal, who is competent authority to revise confirmation in the


- rank of ASI and SI therefore, on this score alone the appeal of the appellant is liable to be dismissed.
4. Incorrect, reply to this Para has already been explained in the facts of Para No.3.
 5. Incorrect, appellant in order to defuse the limitation has wrongly contended that he was unaware of the impugned order which was passed in the year 2007. Appellant has impugned the order after long period of about 6 years. Therefore the appeal is not maintainable at this stage.
 6. Incorrect, the appellant did not bother to submit timely departmental appeal against the order No. 4673-75/EC-1 dated 14.05,2007. Later on the appellant submitted departmental appeal on 12-11-2012 which was badly time barred and his representation was also without any force and substance, therefore not considered.
 7. Incorrect, reply to this para has already been explained in facts of Para No. 6.
 8. Incorrect, appellant has filed time barred appeal.

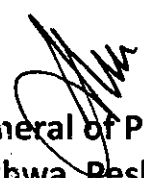
GROUND:

- a. Incorrect, the impugned order is according to law. The order is legal, lawful and passed by competent authority and liable to be maintained, and the appellant has been treated fairly, justly and no discrimination has been done to him.
- b. Incorrect, reply to this para has already been explained in facts of Para No. 3.
- c. Incorrect, the lien of appellant was attached to Capital City police (CCP) in the year 2004 at the bottom of offg:Sis on list "E" while he was posted at motorway police at that time.
- d. Incorrect, the appellant has not implead the said colleague officer as respondents. Furthermore, seniority of police officers of junior ranks is regulated by police rules and promotion and confirmation is subject to qualifying relevant courses and gaining prescribed experience.
- e. Incorrect, restoration of seniority is made subject to reasonable and solid grounds.
- f. Incorrect, the appellant was treated in accordance with law and rules. No fundamental rights of the appellant were infringed/encroached by the respondents.
- g. Incorrect, no accrued right of appellant has been denied by the respondents.
- h. That the respondents also seek permission of this honorable tribunal to raise additional points at the time of arguments.

Prayers:

It is therefore, humbly prayed that Keeping in view of aforementioned submissions, the subject appeal of appellant devoid of merit, legal footing may graciously be dismissed.


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(RESPONDENT No. 1 & 2)**


**Deputy Inspector General of Police, CTD,
Khyber Pakhtunkhwa, Peshawar.
(RESPONDENT No. 3)**

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 547/2013

Inspector Asad Mehmood, presently working and posted at CTD, Khyber Pakhtunkhwa, Peshawar.Appellant

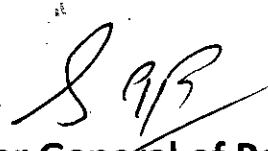
VERSUS


1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. Addl: Inspector General of Police/Hqrs., Peshawar.
3. Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.Respondents

AFFIDAVIT

We the deponents in the above titled service appeal, do here by solemnly affirm and declare on oath that the contents of Para wise comments are correct and true to the best of our knowledge and belief and nothing have been kept concealed from this honorable tribunal.

DEPONENTS


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(RESPONDENT No. 1 & 2)**


**Deputy Inspector General of Police, CTD,
Khyber Pakhtunkhwa, Peshawar.
(RESPONDENT No. 3)**

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,

Service Appeal No. 547/2013

Inspector Asad Mehmood, presently working and posted at C
Pakhtunkhwa, Peshawar.

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. Addl: Inspector General of Police/Hqrs., Peshawar.
3. Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.

AFFIDAVIT

We the deponents in the above titled service appeal, do here by solemnly affirm and declare on oath that the contents of Para wise comments are correct and true to the best of our knowledge and belief and nothing have been kept concealed from this honorable tribunal.

DEPONENTS

Inspector General
Khyber Pakhtunkhwa

NOTE SHEET - C. P. O.

Sir,

The instant representation has been preferred by Inspector Asad Mehmood of DCT/SB Peshawar wherein he has prayed for granting him seniority w.e.f. 07.09.1988 instead of 2004.

In this regard it is submitted that he was transferred from Balochistan Police to this Province vide letter No. SO (O&M-I) S&G AD/13-15/95/SI dated 10.01.1998 issued by Government of Balochistan Service & General Administration Department Quetta.

At that time he was required to have been placed at the bottom of seniority list of Sub-Inspectors as per the said letter but his name was placed at the bottom of seniority list of Sub-Inspector w.e.f. 09.02.2004.

In my opinion his case for the grant of seniority from the date when he was posted at CCP Peshawar, is worth consideration and his case may be referred to DSC for further consideration and necessary action if so approved please.


AIG/Legal
DSP/Legal

Addl: IGP/HQrs:

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

In Ref; to Service Appeal No. 547 of 2013.

Inspector Asad Mehmood.....VERSUS..... PPO & others

REJOINDER ON BEHALF OF THE APPELLANT.

RESPECTFULLY SHEWETH;

REPLY TO THE PRELIMINARY OBJECTIONS;

- 1). Incorrect. As a basic fundamental right of legal profession is denied to the appellant hence no question of not coming with clean hands is arisen.
- 2).Incorrect. The appellant has got the good cause of action and locus-standi.
- 3). Incorrect. No any defect is pointed out by the answering respondents.
- 4).incorrect. The appeal is well within time. Furthermore in case of void order on one hand and on the other hand, continuous injury to a civil servant does not attract the bar of limitation.
- 5). Incorrect. Not a single and slightest fact has ever been concealed by the appellant what to say of concealment of a material fact.
- 6). Incorrect. All the necessary parties have properly been arrayed as respondents.

FACTS:-

- 1) Being admitted and while pertains to the record, needs no reply. Date of enlistment as ASI in the year 1989 instead of 1987 is a clerical mistake.

- 2) Being admitted and while pertains to the record, needs no reply. Transfer from Baluchistan to KPK dated 09-07-1998 and inadvertently it was written as -7-09-1998 which is clarify-able from the record and is a clerical mistake.
- 3) Correct to the extent that the appellant after his transfer from Baluchistan to FRP Peshawar was transferred and posted to Peshawar range on 01-03-1999 instead of 05-04-1999 while the rest of the comments are frivolous, ambiguous and imaginary one as all the necessary parties have properly been arrayed as respondents.
- 4) Incorrect. Para-4 is fully explained in detail in Para 3 above.
- 5) Incorrect. The appellant had accepted the terms and condition of his transfer order dated 01-08-1998 (Annexure "B" Page 11) that he will accept bottom seniority of S.Is in the N.W.F.P Police but he was neither granted/allotted police number nor placed anywhere in any seniority list. Similarly on further posting to Peshawar range dated 26-02-1999 (Annexure "C" Page 12) he was again deprived of his police number and was not placed anywhere in any seniority list. Furthermore the appellant has never challenged any seniority list for which limitation could be a hurdle but the appellant in the light of order (Annexure "B" Page 11) was not placed at the bottom of the then S.Is in the year 1998 and he was deprived of his police number. Moreover orders (Annexure "B" Page 11) and (Annexure "C" Page 12) being void orders and the appellant while suffering from continuous injury and continuous loss, could never be knock out on point of limitation.
- 6) Incorrect. Detailed reply has been given in Para-5 above.
- 7) Incorrect. Detailed reply has been given in Para-5 above.
- 8) Incorrect. Detailed reply has been given in Para-5 above.

GROUND S:-

- a) Incorrect. That the Appellant has a proper recurring cause of action and is suffering from continuous legal injury and his grievances should have been redressed by the Appellate Authority and by not doing so, the impugned order is illegal, unlawful, without lawful authority, without

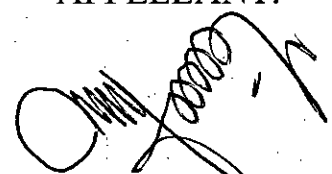
jurisdiction, against the law on the subject and against the norms of natural justice and liable to be declared as such.

- b). Incorrect. Detailed reply has been given in Para-3 above.
- c). Incorrect. Detailed reply has been given in Para-5 of the facts above..
- d). Incorrect. The comments to the Para-d of the appeal are not relevant having no relevancy whatsoever with the claim/right of the appellant
- e). Incorrect. Annexure "B" and "C" with the main appeal provides reasonable and solid ground for rectification of the impugned order.
- f). Incorrect. The Appellant has vested valuable right accrued to him regarding proper correction as prayed for in his service record and violation thereof would hit the command of constitution and such fundamental rights could not be taken away with a single stroke of pen.
- g). Not correct. The valuable right was accrued to the appellant whereas his fundamental valuable rights have been encroached by the respondents No.2 & 3 on their personal whims & wishes and such encroachment is hit by the command of the constitution of the Islamic Republic of Pakistan 1973.
- h). Legal: Hence no reply.

In view of the foregoing facts and grounds in shape of the rejoinder on behalf of the appellant, it is therefore humbly prayed that the appeal of the appellant may graciously be allowed enabling the appellant to get the redressal of his grievances.

Through;

Dated:-28/04/2013

APPELLANT.


Muhammad Usman Khan
Turlandi
Advocate Peshawar.

OFFICE: Flate # C-1 Haji Murad Plaza Dalazak Road Peshawar City

Cell#:0333-9153699/03005895841

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

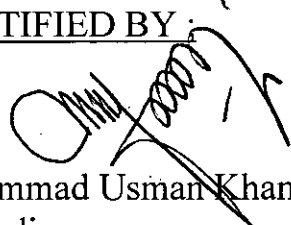
In Ref; to Service Appeal No. 547 of 2013.

Inspector Asad Mehmood.....VERSUS..... PPO & others

AFFIDAVIT.


I, Inspector Asad Mehmood DCT (SB) Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanying Rejoinder are true and correct to the best of my knowledge and belief and that nothing has been kept secret or concealed therein from this august Tribunal.

IDENTIFIED BY:


Muhammad Usman Khan
Turlandi
Advocate Peshawar


DEPONENT

ATTESTED


05.08.2014
Mian Sibghat Ullah Shah
Advocate
Notary Public/Oath Commissioner
High Court Peshawar



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

In Ref; to Service Appeal No. 547 of 2013.

Inspector Asad Mehmood.....VERSUS..... PPO & others

REJOINDER ON BEHALF OF THE APPELLANT.

RESPECTFULLY SHEWETH;

REPLY TO THE PRELIMINARY OBJECTIONS;

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Being admitted and while pertains to the record, needs no reply. Transfer from Baluchistan to KPK dated 09-07-1998 and inadvertently it was written as -7-09-1998 which is clarify-able from the record and is a clerical mistake.

- 3) Correct to the extent that the appellant after his transfer from Baluchistan to FRP Peshawar was transferred and posted to Peshawar range on 01-03-1999 instead of 05-04-1999 while the rest of the comments are frivolous, ambiguous and imaginary one as all the necessary parties have properly been arrayed as respondents.
- 4) Incorrect. Para-4 is fully explained in detail in Para 3 above.
- 5) Incorrect. The appellant had accepted the terms and condition of his transfer order dated 01-08-1998 (Annexure "B" Page 11) that he will accept bottom seniority of S.Is in the N.W.F.P Police but he was neither granted/allotted police number nor placed anywhere in any seniority list. Similarly on further posting to Peshawar range dated 26-02-1999 (Annexure "C" Page 12) he was again deprived of his police number and was not placed anywhere in any seniority list. Furthermore the appellant has never challenged any seniority list for which limitation could be a hurdle but the appellant in the light of order (Annexure "B" Page 11) was not placed at the bottom of the then S.Is in the year 1998 and he was deprived of his police number. Moreover orders (Annexure "B" Page 11) and (Annexure "C" Page 12) being void orders and the appellant while suffering from continuous injury and continuous loss, could never be knock out on point of limitation.
- 6) Incorrect. Detailed reply has been given in Para-5 above.
- 7) Incorrect. Detailed reply has been given in Para-5 above.
- 8) Incorrect. Detailed reply has been given in Para-5 above.

G R O U N D S :-

- a) Incorrect. That the Appellant has a proper recurring cause of action and is suffering from continuous legal injury and his grievances should have been redressed by the Appellate Authority and by not doing so, the impugned order is illegal, unlawful, without lawful authority, without

jurisdiction, against the law on the subject and against the norms of natural justice and liable to be declared as such.

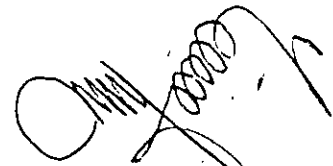
- b). Incorrect. Detailed reply has been given in Para-3 above.
- c). Incorrect. Detailed reply has been given in Para-5 of the facts above.
- d). Incorrect. The comments to the Para-d of the appeal are not relevant having no relevancy whatsoever with the claim/right of the appellant.
- e). Incorrect. Annexure "B" and "C" with the main appeal provides reasonable and solid ground for rectification of the impugned order.
- f). Incorrect. The Appellant has vested valuable right accrued to him regarding proper correction as prayed for in his service record and violation thereof would hit the command of constitution and such fundamental rights could not be taken away with a single stroke of pen.
- g). Not correct. The valuable right was accrued to the appellant whereas his fundamental valuable rights have been encroached by the respondents No.2 & 3 on their personal whims & wishes and such encroachment is hit by the command of the constitution of the Islamic Republic of Pakistan 1973.
- h). Legal: Hence no reply.

In view of the foregoing facts and grounds in shape of the rejoinder on behalf of the appellant, it is therefore humbly prayed that the appeal of the appellant may graciously be allowed enabling the appellant to get the redressal of his grievances.

Through;

Dated; - 9/04/2013

APPELLANT.



Muhammad Usman Khan
Turlandi
Advocate Peshawar.

OFFICE: Flate # C-1 Haji Murad Plaza Dalazak Road Peshawar City

Cell#: 0333-9153699/03005895841

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

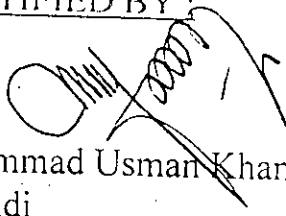
In Ref; to Service Appeal No. 547 of 2013.

Inspector Asad Mehmood..... VERSUS..... PPO & others

AFFIDAVIT.

I, Inspector Asad Mehmood DCT (SB) Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanying Rejoinder are true and correct to the best of my knowledge and belief and that nothing has been kept secret or concealed therein from this august Tribunal.

IDENTIFIED BY:



Muhammad Usman Khan
Turlandi
Advocate Peshawar



DEPONENT

ATTESTED

Mian Sibghat Ullah Shah
Advocate
Notary Public/Oath Commissioner
High Court Peshawar



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 804 /ST

Dated 27 / 05 / 2015


To

The P.P.O,
Peshawar.

Subject: - APPEALS NO. 547/2013 ASAD MEHMOOD VS P.P.O PESHAWAR AND OTHERS.

I am directed to forward herewith a certified copy of Judgement dated 15.05.2015 passed by this Tribunal on subject appeal for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.