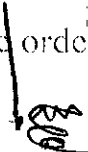


FORM OF ORDER SHEET

Court of _____

Case No.- 829/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/04/2023	<p>The appeal of Mr. Zakria Khan presented today by Mr. Muhammad Arif Jan Advocate. It is fixed for preliminary hearing before to Single Bench at Peshawar on <u>14-04-23</u>. Parcha Peshi is given to appellant/counsel for the date of fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p> <p>7</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. *329/*2023

Zakria Khan Senior Clerk

.....Appellant

VERSUS

Provincial Police Officer Khyber Pakhtunkhwa, Peshawar & others

.....Respondents

INDEX

S#	Description of documents.	Annexure	Pages
1.	Service Appeal with affidavit		<i>1-7</i>
2.	Stay application with affidavit		<i>8-9</i>
3.	Addresses of the parties		<i>10</i>
4.	Copy of Seniority list	A	<i>11-16</i>
5.	Copies of departmental appeal and application	B & B/1	<i>17-20</i>
6.	Copy of letter dated 03-01-2023	C	<i>21</i>
7.	Copy of advertisement	D	<i>22</i>
8.	Wakalatnama		<i>23</i>

Appellant

Through

[Signature]
Muhammad Arif Jan

Advocate High Court

Chamber:

212, New Qatar Hotel, Sikandar Town G.T Road,

Peshawar Cell: 0333-2212213

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. ⁸²⁹ /2023

Zakria Khan Senior Clerk District Police Office Nowshera.

.....Appellant

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. Additional Inspector General of Police (HQ) Khyber Pakhtunkhwa, Peshawar.
3. Assistant Inspector General of Police (Establishment) CPO, Khyber Pakhtunkhwa, Peshawar.

.....Respondents

APPEAL U/S-4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974.

Respectfully Sheweth;

1. That the appellant was initially appointed as Junior Clerk on 22-09-1990 and was posted at District Police Office, Nowshera where posted till date.
2. That the appellant is performing his duties with full zeal & zest, devotion, determination and to the entire satisfaction of his superiors and being qualified and fulfilling all the

requisite criteria for promotion to the post of Senior Clerk, the appellant with un-blemished record have been promoted as Senior Clerk vide Notification dated 26-12-2019, but it is worth mentioned here that the appellant was promoted much later than his colleagues.

3. That final seniority list dated 30-10-2021 was issued wherein the appellant was placed at S.No-13 and meanwhile departmental promotion committee meeting was held on 09-02-2021 in respect of departmental promotion to the post of Assistant Grade Clerk (BPS-16), but the appellant was deferred due to lack of experience of (three years). **(Copy of seniority list is attached as Annex-A).**
4. That as and when the appellant did complete the required period and gained the requisite experience, thus approached to respondent No-1 by filing departmental appeal (brief mentioned therein) but no any information whatsoever has been provided to the appellant despite written application. **(Copies of departmental appeal and application are attached as Annex-B & B/1).**
5. That respondent No-1 decided the departmental appeal of the appellant on 03-01-2023 and copy of the same was received to the appellant vide dairy No-1022 dated 22-03-2023 through

District Police Office, Nowshera. (Copy of letter dated 03-01-2023 is attached as Annex-C).

6. That to implement the order/letter *ibid* and to hold Departmental Promotion Committee meeting (DPC) in the light of letter dated 03-01-2023 to promote the appellant against the subject post, respondent No-3 intentionally advertised the said post vide advertisement in July, 2022 just to deprive the appellant from promotion. (Copy of advertisement is attached as Annex-D).
7. That copy of the impugned letter dated 03-01-2023 was handed over to the appellant vide dairy No-1022 dated 22-03-2023 through District Police Office, Nowshera, hence the instant appeal is within time on the following amongst other grounds;

GROUND:

- A. Because, the acts, commissions and omissions of respondents (hereinafter impugned) by way of not implementing the office letter dated 03-01-2023 of respondent No-1 along with advertisement of July, 2022 (impugned up-to the extent of subject post) are patently illegal, unlawful, without law authority, of no legal effect, having no value in the eyes of

Law, thus liable to be declare illegal, unlawful, ineffective upon the rights of appellant and respondents be directed to arrange special Departmental Promotion Committee DPC meeting to promote the appellant from due date being qualified, entitled and eligible in all respect to the post of Assistant Grade Clerk (BPS-16) without further delay, reason and justification with all back benefits, moreover the respondents may also be restrain from to fill up the post of Assistant Grade Clerk (BPS-16) through impugned advertisement or through any other means except through DPC meeting.

B. Because, vide impugned order dated 03-01-2023, the case of the appellant was sent for consideration before the authorities concerned, but knowing all these, respondent No-3 advertised different post including the subject post with mala-fide intentions for no any good reason and justification except to deprive the appellant from promotion.

C. Because, the respondents have numerous post of Assistant Grade Clerks but are reluctant to hold DPC meeting, hence liable to withdraw the subject post from the impugned advertisement with all pre and post proceedings and to promote the appellant with all back benefits.

D. Because, the respondents are bound under the law to follow the law, rules and regulations governing the subject matter, but the instant case, not only they violated their own law,

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rules and regulations but also violated the principals laid down by the superior court on the subject matter thus invites consideration of this Hon'ble Tribunal.

- E. Because, the other colleagues of the appellant have already been promoted to the post of Assistant Grade Clerks but the appellant has not only deprived from promotion but also facing financial losses including the future seniority, service and service benefits.
- F. That any other ground which has not been mentioned may also be permitted to raise at the time of hearing.

It is, therefore, respectfully prayed that in the context of the appeal in hand,

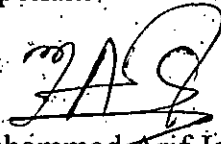
- i. The order/notification of respondent No-1 dated 03-01-2023 may graciously be strictly implemented and respondents may also be directed to hold DPC meeting to promote the appellant to the post of Assistant Grade Clerk from due date without any further delay, reason and justification with all back benefits.
- ii. All the pre and post proceedings upon the impugned advertisement of July, 2022 up-to the extent of post of Assistant Grade Clerks may also be declare illegal, unlawful and ineffective upon the rights of appellant.

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- iii. Respondents may further be restrained from filling up the post of Assistant Grade Clerks (BPS-16) through advertisement ibid or through any other means except through departmental promotion committee till final disposal of the instant appeal.
- iv. Any other relief which has not been specifically asked for may also be granted in favour of appellant.


Appellant

Through


Muhammad Arif Jan
Advocate High Court

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. /2023

Zakria Khan Senior Clerk

.....Appellant

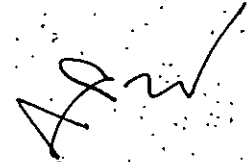
VERSUS

Provincial Police Officer Khyber Pakhtunkhwa, Peshawar & others

.....Respondents

AFFIDAVIT

I, Zakria Khan Senior Clerk District Police Office Nowshera do hereby affirm and declare on oath that the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.



DEPONENT



8

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. /2023

Zakria Khan Senior Clerk

.....Appellant

VERSUS

Provincial Police Officer Khyber Pakhtunkhwa, Peshawar & others

.....Respondents

***APPLICATION FOR RESTRAIN THE RESPONDENTS FROM
FILLING UP THE POST OF ASSISTANT GRADE CLERKS
(BPS-16) THROUGH IMPUGNED ADVERTISEMENT JULY,
2022 TILL FINAL DISPOSAL OF THE INSTANT APPEAL.***

Respectfully Sheweth:

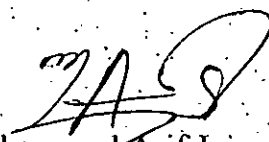
- 1) That the above titled appeal is being filed before this Hon'ble Tribunal along with instant application.
- 2) That the grounds of main appeal may kindly also be considered as part and parcel of this application.
- 3) That appellant has a good prima-facie case in her favor and is also sanguine about its success.
- 4) That balance of convenience also lies in favour of appellant.
- 5) That if the interim relief as prayed for is not granted and the impugned advertisement is acted upon then the very purpose of titled appeal will becomes in fructuous, hence this application.

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It is, therefore, prayed that on acceptance of this application, the relief as prayed for in the heading of this application may graciously be granted.

Appellant.

Through



Muhammad Arif Jan

Advocate High Court

AFFIDAVIT

I, Zakria Khan Senior Clerk District Police Office Nowshera do hereby affirm and declare on oath that the contents of instant application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.


DEPONENT



10

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. /2023

Zakria Khan Senior Clerk

.....Appellant

VERSUS

Provincial Police Officer Khyber Pakhtunkhwa, Peshawar & others

.....Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

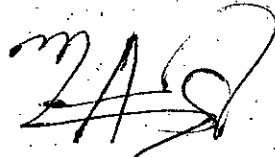
Zakria Khan Senior Clerk District Police Office Nowshera

RESPONDENTS:

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. Additional Inspector General of Police (HQ) Khyber Pakhtunkhwa, Peshawar.
3. Assistant Inspector General of Police (Establishment) CPO, Khyber Pakhtunkhwa, Peshawar.

Appellant

Through



Muhammad Arif Jan

Advocate High Court



Annex - A

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

SENIORITY LIST OF SENIOR CLERKS (BPS-14) AS IT STOOD ON 30.10.2021.

No. 3290 /E-V: The Seniority list of Senior Clerks (BPS-14) of Khyber Pakhtunkhwa Police is published for information to all concerned.

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
1.	Muhammad Aslam	18.05.1965	17.05.2025	Bannu	10 th	06.10.1985	02.12.2009	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to incomplete ACRs from the period of 01.01.2015 to 31.12.2015, 28.09.2016 to 31.12.2016, 01.01.2017 to 31.12.2017 and 01.01.2018 to 31.12.2018.
2.	Gul Said	06.08.1969	05.08.2029	Kohat	10 th	13.02.1988	11.12.2012	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to incomplete ACRs from the period of 01.01.2018 to 31.12.2018 and 01.01.2019 to 31.12.2019.
3.	Muhammad Shafiq	01.05.1962	30.04.2022	Karak	F.A	02.11.1987	02.07.2015	The DPC Meeting held on 09.02.2021 and recommended that his name may be placed above the name of Abdul Karim along whom he was promoted in 2015. The DPC meeting held on 04.03.2021 and recommended him to be conditionally promoted as Assistant Grade Clerk vide this office Notification No. 823-50/E-V, dated 12.03.2021. Later on he was deferred due to non completion of missing ACR vide this office Notification No. 1178-88/E-V, dated 14.04.2021.

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Supdt. E-V,

Supdt. CPB,

Supdt. Secret,

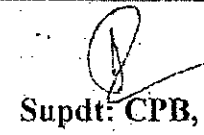
Registrar,

REGISTERED

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
4.	Ibrar Hussain	13.08.1966	12.08.2026	Peshawar	10 th	02.05.1988	07.11.2019	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to not completed three (03) experience as Senior Clerk according KPK Ministerial service Rules 1974.
5.	Muhammad Abid-I	12.10.1968	11.10.2028	Kohat	F.A	26.09.1988	22.07.2013	The DPC Meeting held on 09.02.2021, and recommended that his name may be placed above the name of Imdad Hussain Shah along whom he was promoted in 2013. The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to incomplete ACRs from the period of 01.01.2015 to 31.12.2015 and 01.01.2016 to 31.12.2016.
6.	Imdad Hussain Shah	25.03.1969	24.03.2029	Bannu	10 th	29.10.1988	22.07.2013	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to incomplete ACRs from the period of 01.01.2017 to 30.08.2017 and 21.02.2019 to 31.12.2019.
7.	Muhammad Shoaib	01.01.1969	31.12.2028	Swabi	10 th	08.09.1988	11.12.2012	The DPC Meeting held on 09.02.2021, and recommended that his name may be placed above the name of Hussain Habib along whom he was promoted in 2012. The DPC meeting held on 04.03.2021 and recommended him to be conditionally promoted as Assistant Grade Clerk vide this office Notification No. 823-50/E-V, dated 12.03.2021. Later on he was deferred due to non completion of missing ACR vide this office Notification No. 1178-88/E-V, dated 14.04.2021.

(12)


Supdt. E-V,


Supdt. CPB,


Supdt. Secret,


Registrar,

~~ATTESTED~~

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
8.	Sibghatullah-I	08.05.1964	07.05.2024	Bannu	10 th	30.10.1989	02.12.2009	The DPC examined his case and recommended him to be superseded due to adverse ACR for the period of 08.04.2017 to 31.12.2017.
9.	Ajmal Khan	01.04.1969	31.03.2029	Peshawar	10 th	06.12.1989	07.11.2019	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk because he was not completed three (03) experience as Senior Clerk according KPK Ministerial service Rules 1974.
10.	Muhammad Bashir-II	02.01.1971	01.01.2031	Mansehra	10 th	16.06.1990	05.06.2009	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to incomplete ACRs from the period of 21.04.2015 to 31.12.2015, 01.01.2016 to 30.06.2016, 29.07.2017 to 31.12.2017, 01.01.2018 to 31.12.2018 and 01.01.2019 to 31.12.2019.
11.	Muhammad Younis	18.01.1972	17.01.2032	Bannu	10 th	20.07.1990	11.12.2012	The DPC examined his case and recommended him to be deferred because he was given advice in ACRs regarding his poor performance for the period from 01.01.2017 to 31.12.2017 and 19.05.2018 to 31.12.2018.
12.	Shoukat Ali-I	14.06.1970	13.06.2030	D.I. Khan	F.A.	05.09.1990	08.08.2009	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to incomplete ACRs from the period of 24.08.2016 to 31.12.2016 and 01.01.2019 to 15.05.2019.
13.	Zakria Khan	04.05.1972	03.05.2032	Nowshera	B.A	22.09.1990	07.11.2019	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk because he was not completed three (03) experience as Senior Clerk according KPK Ministerial service Rules 1974.

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Supdt: E-V,

Supdt: CPB,

Supdt: Secret,

Registrar,

ARRESTED

/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
14.	Raj Malook	01.04.1966	31.03.2026	Buner	10th	09.03.1991	02.07.2015	The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk due to incomplete ACR from the period of 21.06.2019 to 31.12.2019.
15.	Gul Karim	29.02.1965	28.02.2025	Charsadda	F.A	10.04.1991	02.07.2015	The DPC meeting held on 04.03.2021 and recommended him to be conditionally promoted as Assistant Grade Clerk vide this office Notification No. 823-50/E-V, dated 12.03.2021. Later on he was deferred due to non completion of missing ACR vide this office Notification No. 1178-88/E-V, dated 14.04.2021.
16.	Shahid Mehmood	10.04.1965	09.04.2025	Kohat	10 th	28.12.1987 FC 18.08.1991 JC	11.12.2012	The DPC examined his case and recommended him to be superseded due to adverse ACR for the period of 01.01.2015 to 31.12.2015 and also incomplete ACR for the period from 01.01.2019 to 31.12.2019.
17.	Noor -Ul-Arifeen	01.04.1970	31.03.2030	Buner	BSC	09.03.1991	07.11.2019	The DPC Meeting held on 09.02.2021, and recommended that his name may be placed above the name of Ikram-ul-Haq along whom he was promoted in 2019. The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk because he was not completed three (03) experience as Senior Clerk according KPK Ministerial service Rules 1974.
18.	Ikram-ul-Haq	16.05.1971	15.05.2031	Charsadda	FA	14.09.1991	07.11.2019	Serving in NECTA on Deputation basis for a period of (03) years, vide order No. 76-81/E-V, dated 07.01.2020. The DPC examined his case and recommended him to be deferred for promotion to the rank of Assistant Grade Clerk because he was not completed three (03) experience as Senior Clerk according KPK Ministerial service Rules 1974.

Supdt: E-V,

Supdt: CPB,

Supdt: Secret,

Registrar,

ATTESTED

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
19.	Shahid Ali	01.04.1972	31.03.2032	Peshawar	10 th	01.11.1991	02.12.2009	
20.	Sardar Ali	15.03.1971	14.03.2031	Swat	10 th	12.12.1991	08.08.2009	
21.	Waheed-uz-Zaman	21.02.1971	20.02.2031	Karak	10 th	08.02.1992	08.08.2009	
22.	Rashid Mehmood	01.05.1972	30.04.2032	Peshawar	B.A	11.02.1992	07.11.2019	
23.	Shah Nawaz	12.02.1969	11.02.2029	Kohat	F.A	17.02.1992	08.08.2009	
24.	Sahar Gul	12.04.1973	11.04.2033	Peshawar	10 th	24.02.1992	08.08.2009	
25.	Umar Zada	18.05.1972	17.05.2032	Dir	10 th	07.03.1992	08.08.2009	
26.	Badshah Din	01.04.1972	31.03.2032	Bannu	F.A	16.03.1992	11.12.2012	
27.	Azim Khan	12.02.1965	11.02.2025	Peshawar	10 th	22.03.1992	08.08.2009	
28.	Irfanullah-I	06.10.1970	05.10.2030	D.I Khan	F.A	07.07.1992	02.12.2009	
29.	Sherin Badshah	08.05.1966	07.05.2026	Karak	B.A	17.08.1992	11.12.2012	
30.	Gul Aslam	10.08.1966	09.08.2026	Lakki	F.A	19.08.1992	02.12.2009	
31.	Aziz-ul-Haq	05.03.1967	04.03.2027	Charsadda	F.A	19.08.1992	02.12.2009	
32.	Jamil Ahmad	25.12.1971	24.12.2031	DIKhan	D.Com	19.08.1992	02.12.2009	
33.	Mir Muhammad	24.10.1967	23.10.2027	Bannu	F.A	19.08.1992	11.12.2012	
34.	Javed Khan-I	11.02.1970	10.02.2030	Mardan	F.A	20.08.1992	11.12.2012	
35.	Abdur Rauf	10.02.1967	09.02.2027	D.I Khan	10 th	23.08.1992	02.12.2009	

Supdt: E-V,

Supdt: CPB,

Supdt: Secret,

Registrar,

ATTESTED

O.	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
0.	Sohail Ahmad	04.08.1984	03.08.2044	Peshawar	F.SC	23.07.2009	07.11.2019	

Any officer who has any objection regarding his Seniority/Missing of name/Date of Birth etc, he must submit his representation within one month after the issuance of this list, otherwise no representation will be entertained after the specific period.

Supdt: E-V

Supdt: CPB

Supdt: Secret

Registrar,

Z. Asghar
 (ZEESHAN ASGHAR) PSP
 AIG/Establishment
 For Inspector General of Police,
 Khyber Pakhtunkhwa, Peshawar

No. 3291-99 /E-V, dated Peshawar, the 30/11/2021.
 Copy of above is forwarded for information and necessary action to the:-

1. All Addl: Inspector General of Police, in Khyber Pakhtunkhwa.
2. Capital City Police Officer, Peshawar.
3. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
4. Commandant, PTC, Hangu.
5. All Regional Police Officers in Khyber Pakhtunkhwa.
6. All Deputy Inspector General of Police, in Khyber Pakhtunkhwa.
7. Chief Traffic Officer, Peshawar.
8. Commandant, CPC, Peshawar.
9. Assistant Inspector General of Police, BDU, Peshawar.
10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. All Superintendent of Police, Investigations in Khyber Pakhtunkhwa.
14. All Branches in CPO, Peshawar.
15. In-charge, Central Registry Cell, CPO, Peshawar.

ATTESTED

FC

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Annex-B

**OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA**

Tel No. 0923-9220102 & Fax No. 0923-9220103
Email Dpo_nowsherakpk@yahoo.com


2022

To: - The Regional Police Officer,
Mardan.

No 18604 /EC, Dated Nowshera the 17/11 /2022.

Subject: **REPRESENTATION**

Memo: Enclosed please find herewith a self-explanatory application/ representation submitted by Senior Clerk Zakaria Khan of this office for the grant of his seniority with his colleagues for consideration, please.


District Police Officer,
Nowshera

~~ATTACHED~~

(P)

To:

The Worthy Inspector General of Police Khyber
Pakhtunkhwa, Central Police Office, Peshawar.

Through: Proper channel.

Subject: DEPARTMENTAL REPRESENTATION

Respected Sir.

The applicant humbly submits as under:

1. That the appellant was initially appointed as Junior Clerk in the Khyber Pakhtunkhwa Police Department on 22.09.1990.
2. That the appellant performed his duties with full zeal and zest and there is/was no any complaint or inquiry whatsoever been pending before any authority up-till now rather the appellant had served the department with unblemished record up-till now.
3. That on 30.10.2021, seniority list was maintained of Senior Clerks (BPS-14), wherein, the appellant was placed at S.No.13 and his case was placed before the DPC for further promotion, but unluckily the same was deferred due to lack of requisite experience.
4. That the appellant now after fulfilling all the requisite criteria for promotion to the post of Assistant, vide letter dated 15.04.2022 and similarly on 17.02.2022 and to the compliance of the same, the appellant submitted all the requisite documents well within time before the competent authority for consideration and promotion.
5. That despite to constitute a DPC which is even evident from the contents of the letter dated 15.04.2022 that the same is to be conveyed shortly, but astonishingly the subject post was advertised on 22.07.2022 and applications were asked for all eligible candidates for the post of Assistant (BPS-16) till 08.08.2022.
6. That the advertisement and the disinterest of the authority concerned to convene the DPC well before the advertisement is

NOTED


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nothing but just to deprive the appellant from valuable rights of promotion.

7. That if the advertisement ibid is acted upon then the appellant will be suffered with irreparable losses.
8. That the appellant was called repeatedly for promotion to the higher rank BPS-16 but the DPC was not conducted due to some unknown reasons.
9. That the appellant may be granted his due seniority with his colleagues so that his grievances may be redressed.

It is therefore respectfully submitted that on acceptance of the instant departmental appeal, a special DPC may graciously be constituted for promotion of Senior Clerks to Assistants (BPS-16) for which the appellant is qualified, eligible and entitled in all four corners. The operation of the impugned advertisement upto to the extent of post of Assistant may also be suspended till decision of the appeal.

Appellant


Zakaria Khan
Senior Clerk
District Police office
Nowshera

2/11/022

~~ATTESTED~~

گرفتہ ہے۔ اس کے بعد اس کے لئے اس کے لئے اس کے لئے

(20)

درخواست گزار کے مطابق حکم از حکمانہ اہل حرم 2/11/2022

جائی

موردیہ لڈاؤں کی بجائے کہ من سامنے آئے

حضور کے روبرو اپنے ترقی کا بابت مورخ 2/11/2022 کو

ایف جی ایم اے ایل ڈی کے لئے درخواستیں کی گئیں۔ کافی عرصہ گزر چکا ہے۔
لیکن آج تک من سامنے کو کوئی خبر یا حکم وغیرہ نہیں مل سکا ہے۔

اس لئے یہاں پر ادب کیلئے لڈاؤں کی بجائے

کہ اگر من سامنے جی ایم اے ایل ڈی مورخ 2/11/2022 کو

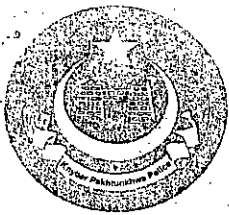
منعزل ہوا ہو۔ فرمایا کہ اس کے لئے اس کے لئے

اللہ کے نام سے
المورخ 2/12/2022

ذریعہ کار
ڈسٹرکٹ کونسل ٹوٹن

ATTESTED

+



21 Annex-C

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

No. CPO/CPB/ 53 Dated Peshawar 03 January, 2023.

To: The Regional Police Officer,
Mardan Region.

646
21/3/23

Subject: REPRESENTATION.

Message:

Please refer to your office letter No. 9362/ES, dated, 28.11.2022 on the subject noted above and to state that Senior Clerk Zakaria Khan will be considered for promotion to the next higher rank upon the availability of vacancy, completion of required criteria, seniority-cum-fitness.

The applicant may be informed accordingly.

M. Afsar Jan
21/1/23

(AFSAR JAN)

Registrar,

For Inspector General of Police,
Khyber Pakhtunkhwa,

Peshawar

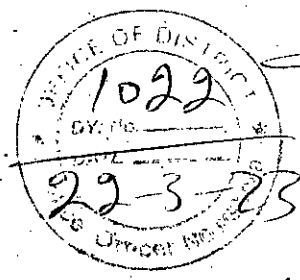
No. 1711/5

21-3-23

CC/DO Nowshera
for info & action

[Signature]

RPD/Mardan
17/3/23



CC/DO
For info & action

[Signature]
DPO NAR
21/3/2023

Online applications are invited from eligible candidates having domicile of Khyber Pakhtunkhwa (including New, Merged Areas/Districts) for recruitment through Education Testing & Evaluation Authority against the following regular posts of Khyber Pakhtunkhwa Police Department.

Sr	Name of Post	Educational Qualification	Age limit	No. of Posts	Zone/District
1.	Computer Operator (BPS-16)	a) Second Class Bachelor's Degree in Computer Science / Information Technology (BCS / BIT 4 years) from a recognized university; OR ii) Second Class Bachelor's Degree from a recognized university with one year Diploma in Information Technology from a Recognized Board in Technical Education with two years experience as Computer Operator.	18 to 30 years	90	Merged District Khyber 06 Mohmand 06 Bajaur 06 Orakzai 06 Kurram 06 South Wab. 06 North Wab. 06 Total: 42 Merit 10 Zone 1 07 Zone 2 07 Zone 3 06 Zone 4 05 Zone 5 05 Minority 02 Female 05 Disabled 01 Total: 48
2.	Assistant (BPS-16)	Bachelor's Degree from a recognized university	18 to 30 years	28	Merit 06 Zone 1 04 Zone 2 04 Zone 3 04 Zone 4 03 Zone 5 03 Minority 01 Female 03 Total: 28
3.	Stenotypist (BPS-14)	i. Intermediate or equivalent qualification from a recognized university or board ii. 35 w.p.m in typing and 80 w.p.m in shorthand in English	18 to 30 years	62	Zone 1 12 Zone 2 11 Zone 3 11 Zone 4 09 Zone 5 09 Minority 03 Female 06 Disabled 01 Total: 62

Annex D
22

TERMS & CONDITIONS:

- Candidates will be provisionally allowed to appear in the ETEA screening test. However, detailed scrutiny will be carried out by the appointing authority and if any candidate is found ineligible in any respect at any stage or in the recruitment process, he/she will be disqualified by the appointing authority.
- Interview call letters will be issued to short listed candidates only.
- Short listing will be based on the screening test conducted by ETEA.
- Candidates shall be eligible in all respects at the test date of receipt of applications.
- Incomplete applications and applications received after due date will not be entertained.
- Relaxation of age will be admissible as per existing government rules/policy.
- The candidates working in government, semi-government bodies should apply through proper channel.
- Candidates intending to apply for more than one post shall apply separately for each post with separate fee.
- The Competent Authority reserve the right to cancel/reject any application with assigning reason.
- No TA/DA is admissible for test/interview.
- In case of foreign degree certificate, equivalent certificates from HEC must be provided.
- Errors/Omissions in number of posts are subject to rectification.

HOW TO APPLY:

- Interested candidates may find and view e-test.edu.pk and apply for the posts online.
- After successful submission of online application, a prescribed UBL online deposit slip (having token number, Project Code & Candidate personal information) will be generated.
- Take a printout of the generated deposit slip & deposit the prescribed test fee (non-refundable) in any branch of UBL Bank at UBL OWA Agent Easy Paisa App or agent.
- After successful fee submission, please keep the original deposit slip (candidate copy) having bank desired stamp with yourself and do not share it with anyone else.
- After online apply, don't send documents/testimonials to ETEA office, copies of testimonials/documents as however, be provided by the candidates and qualify the screening/typing test, as & when required by ETEA or the Appointing Authority for scrutiny purposes.
- Availability of Online Application Form on www.etea.edu.pk is 22nd July 2022.
- Last date for submission of Online Application is 8th August 2022.
- Candidates will be informed through SMS by ETEA to download and print their Roll No. Slip from www.etea.edu.pk. Candidates are directed not to give portable/converted mobile number.
- Test Date, Time & Venue will be mentioned on Roll No. Slip.
- No separate Call Letter will be issued to candidates for screening test through postal/courier means.

NOTE IMPORTANT:

- Please keep your documents and passport size scanned picture (soft copy) with you at the time of online applies.
- Read the instructions thoroughly before filling the Online Application Form.
- ETEA shall verify deposited fee at any stage, if your payments not verified, your candidature shall be rejected.
- Fee deposited on someone else's CNIC shall not be verified.
- Unclaimed qualification will not be accepted.
- Keep the bank printed receipt safe with yourself and do not share it with anyone else.
- Application form will not be given correct information while filling the online application form will not be proceeded against and strict action shall be taken against them.

AIG Establishment
Khyber Pakhtunkhwa Police Department

INF/PM239/2

~~TESTED~~

(23)

WAKALATNAMA

BEFORE THE HONBLE

AP Service Tribunal Pesh

Zakria Khan

Plaintiff(s)
Petitioner(s)
Complainant(s)

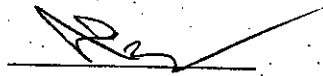
VERSUS

PPO & others

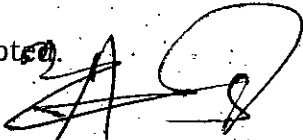
Defendant(s)
Respondent(s)
Accused(s)

By this, power-of-attorney I/we the said Appellant in the above case, do hereby constitute and appoint **MUHAMMAD ARIF JAN** Advocate as my attorney, for me/us in my/our name and on my/our behalf to appear, plead, give statement, verify, administer oath and do all lawful act and things in connection with the said case on my/our behalf or with the execution of any decree or order passed in the case in my/our favour/ against which I/we shall be entitled or permitted to do myself/ourselves, and, in particular, shall be entitled to withdraw or compromise the case or refer it to arbitration or to agree to abide by the special oath of any person and to withdraw and receive documents and money from the Court or the opposite party and to sign proper receipts and discharges for the same and to engage and appoint any other pleader or pay him as his fee irrespective of my/our success or failure in case, provided that, if the case is heard at anyplace other than the usual place of sitting of the Court the pleader shall not bound to attend except on my agreeing to pay him a special fee to be settled between us.

Signature of Client



Accepted



Muhammad Arif Jan

Advocate High Court

Peshawar

Office No.210, Mumtaz Plaza

G.T Road, Hashtnagri Stop,

Peshawar City.

CNIC No.17201-2275748-7

Bc No.10-6663

Cell: 0333-2212213