


28th Nov. 2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment in order to further prepare the brief. This being old case of 2019, last opportunity is granted to both the parties. To come up for arguments on 15.02.2023 before the D.B.



(Fareeha Paul)
Member (E)

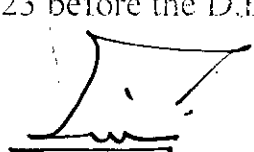

(Kalim Arshad Khan)
Chairman

15.02.2023

Appellant alongwith clerk of his counsel present. Mr. Mamoon-ur-Rasheed, Inspector (Legal) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant submitted an application for adjournment on the ground that learned counsel for the appellant has undergone heart surgery and is on bed rest. Adjourned. To come up for arguments on 19.05.2023 before the D.B.


(Fareeha Paul)
Member (E)


(Salah-ad-Din)
Member (J)


SCANNED
BY
POSTAWAR

26.04.2022

Junior of learned counsel for the petitioner present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Respondents have failed to submit their written reply/comments even today. Vide previous order dated 10.01.2022, it was directed that the respondents shall positively submit reply/comments on the next date failing which their right for submission of reply/comments shall be deemed as struck off. The right of submission of written reply/comments of respondents thus stands struck off. To come up for arguments on 18.07.2022 before the D.B.

18.07.2022



(Rozina Rehman)

Member (J)

Appellant present through counsel.



(Salah-ud-Din)

Member (J)

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 16.09.2022 before D.B.



(Fareeha Paul)

Member(E)



(Rozina Rehman)

Member (J)

16.09.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Tariq Umar, DSP (Legal) for respondents present.

Arguments could not be heard as learned Member Executive (Miss. Fareeha Paul) is on leave. Therefore, case is adjourned to 28.11.2022 for arguments before D.B.



(Rozina Rehman)

Member (J)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

S.A.No.1085/2019

Liaqat Ali.....Appellant

Versus

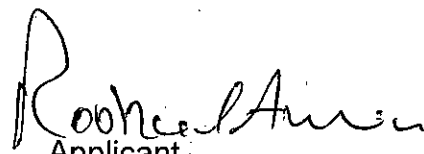
I.G.P and others.....Respondents

APPLICATION FOR ADJOURNMENT

Respectfully submitted;

- 1) That the titled noted appeal is fixed for today i.e. 15.02.2023 before this hon'ble tribunal.
- 2) That the counsel for appellant undergone heart surgery (bypass) and doctors advised complete bed rest for two months, therefore, would be unable to appear and assist this hon'ble court on the date fixed. (Medical attached).

It is, therefore, humbly requested that the case may be adjourned to another date.

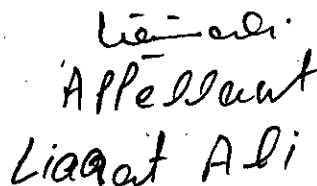


Applicant
Rooh-ul-Amin

Clerk of:

Muhammad Asif
Advocate Supreme Court
Counsel for appellant
Cell: 0332-8885187

Dated: 15.02.2023


Appellant
Liaqat Ali



Adm No: 22-12-20500
 Date: 05 Dec 2022
 Time: 4:54 PM
 PR No: 22-11-107204
 Patient: Muhammad Afi (M. 791)
 Consultant: Dr. Azam Jan

MEDICAL SERVICES
 FOR OPERATION
 OF ANAESTHESIA (COAA)

PR No. - -

Patient Name _____ Date 6/11/22

Consultant _____ Age _____ Gender: M F

Ward B Room / Bed No. _____

1. I hereby authorize Dr. Surya to perform upon M - Afi (Patient's Name) the following surgical and / or medical procedure(s)
Coronary Artery by pass grafting (CABG)

2. I understand that the procedure (s) will be performed at RMI by or under the supervision of _____ who is authorized to utilize the services of other physicians / surgeon or members of the house staff as he or she deems necessary or advisable.

3. It has been explained to me that during the course of the procedure, unforeseen conditions may be revealed that necessitates an extension of original procedure (s) or different procedure (s) than those set forth in paragraph 1. I authorize and request that the above named physician may employ his/her associates or assistants to perform such medical and / or surgical procedures as are necessary and desirable in his exercise of professional judgement.

4. I understand the nature and purpose of the procedure (s), possible alternative methods of diagnosis or treatment, the risk involved, the possible complications, and the consequences of the procedure (s). I acknowledge that no guarantee or assurance has been made as to the results that may be obtained. I am fully informed of the medical facilities presently available in RMI to be used in the above mentioned procedure (s) and their use.

5. I authorize the above named physician / surgeon to administer local, or regional anesthesia.

6. I understand that if it is necessary for me to receive a blood transfusion during this procedure of this hospitalization, the blood will be supplied from sources available to the hospital and tested in accordance with national and hospital regulations. I understand that there are risks in transfusion including, but not limited to allergic, febrile and hemolytic transfusion reaction, and the transmission of infectious diseases such as Hepatitis, AIDS (acquired immune deficiency syndrome). I hereby consent to blood transfusion (s) and / or blood derivatives (s).

7. I hereby authorize representatives of RMI to photograph or videotape me for the purpose of research or medical education. It is understood and agreed that patient confidentiality shall be preserved.

8. I authorize the physician / surgeon named above and / or his / her associates and RMI to preserve for scientific purpose or to dispose of a tissue, organs or other body parts removed during surgery or other diagnostic procedure in accordance with customary medical practice.

9. I consent to the administration of anesthesia by or under the direction of Dr. _____
 I understand and agree that the primary method of anesthesia administration will be _____ this method has been discussed with me in terms that I can understand. If in the course of treatment conditions dictate a change of method, I understand and agree that this will be done at the discretion of the anesthesiologist in attendance. I have been made aware of the medically significant consequences associated with administration of anesthesia.

10. I certify that I have read and fully understand the above consent statement. In addition, I have been awarded an opportunity to ask what questions I may have regarding the procedure (s) and they have been answered to my satisfaction.

11. I consent to the use of my Genetic material for diagnostic and research purpose.

12. I have agreed to all of the above and hereby give my authorization and consent.

Patient or Authorized Representative TUNAWAL Signature [Signature]

If representative, state relationship to patient _____

Medical Officer Name Dr. Waleed Signature [Signature]

If the patient is unable to consent or his/her behalf, complete the following: Patient _____
 to consent because _____

Consultant Name Dr. Azam Jan Signature _____

RM

REHMAN MEDICAL INSTITUTE
 F-23 Phase 3, H-5, Sector F, Faisalabad, Pakistan
 Tel: +92 300 2231204 Fax: +92 300 5023113

Ht = 65
 H = 110 cm

Admission Slip
 Admission ID: 22-12-209063

Patron Name	Muhammad Asif, 73y, Male	Admission Type	Regular
PRN	22-11-107204	Referring Source	OPD
Nationality	Pakistan	Admitted On	05 Dec, 2022-04:54 PM
CNIC	17301-2538125-9	Holder CNIC	—
Phone	+923328865187	Ward	Ward B-Deluxe-203-A SLIC
Address	gul bafiq no 2 Peshawar, Peshawar, Khyber Pakhtunkhwa, Pakistan		
Attendant Name	Junaid Ahsan	Relationship	Next of Kin
Payment Type	Cash	Phone	+923005906048

Clinical Information

Department: Cardiac Surgery | Primary Consultant: Azam Jan | Secondary Consultant: Azam Jan

Packages: Coronary Artery Bypass Grafting

REQUESTED AMOUNT 490,000

UNDERTAKING

- Cost of Treatment: The cost provided in the package is the minimum chargeable amount for the treatment and may exceed in case of additional services required for the treatment. The package covers the exceed in cost up to 10 percent and I hereby agree to clear all dues as per billing rules of RMI.
- I acknowledge that prior approval is required at the time of admission in case of third-party payment. I hereby agree that admissions made on cash shall not be claimed to convert to the third-party payer at a later stage.
- I hereby give my consent to be examined/undergo diagnostic procedures by the medical officer(s) for the purpose of medical education under the supervision of the consultant.
- I Muhammad Asif PRN 22-11-107204 hereby authorize the following to either receive refunds or make outstanding payments on my behalf

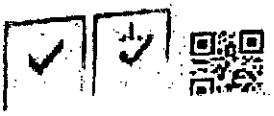
Name: Junaid Ahsan | Relationship: Next of Kin | SIGNATURE: _____

Payment Through: CASH CHEQUE CREDIT CARD OTHER

Cash Received By: _____ | SIGNATURE: _____

Comment: _____

 Raihana Ismail
 05 Dec. 2022
 Date



02.12.2021

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.


Written reply/comments not submitted. Leaned AAG seeks time to contact the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 10.01.2022 before S.B.

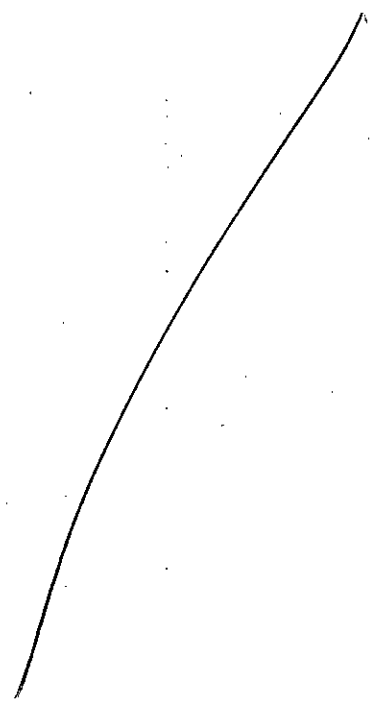

(MIAN MUHAMMAD)
MEMBER (E)

10.01.2022

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for official respondents No. 1 to 3 present.

Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General sought time for submission of reply/comments. Last opportunity is granted to respondents to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 26.04.2022.


(Atiq-Ur-Rehman Wazir)
Member (E)



S.A No. 1085/2019

13.07.2021

Appellant present in person. Preliminary arguments heard.

Keeping the question of limitation relating to departmental appeal intact for determination during full hearing, this appeal, subject to all just and legal objections including objection of limitation is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 02.12.2021 before the D.B.

Appellant Deposited
Security & Process Fee

13/7/21


Chairman

27.10.2020

Appellant in person present.

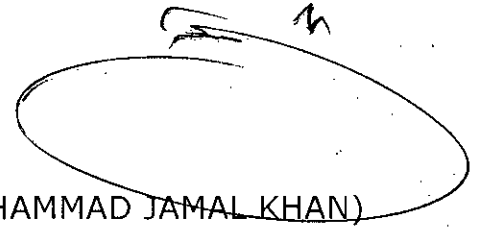
Lawyers are on general strike, therefore, case is adjourned to 06.01.2021 for preliminary hearing, before S.B.



(Rozina Rehman)
Member (J)

06.01.2021

Counsel for appellant is present. He requests for adjournment. Request is acceded to, the appeal is adjourned to 06.04.2021 on which date file to come up for preliminary hearing before S.B.



(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

06.04.2021

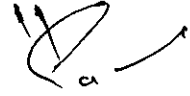
Due to demise of the learned Chairman, the Tribunal is non-functional, therefore, case is adjourned to 13.07.2021 for the same as before.



Reader

16.03.2020

Appellant in person present and seeks adjournment as lawyers community is on strike on the call of Peshawar Bar Association. Adjourn. To come up for preliminary hearing on 28.04.2020 before S.B.



Member

28.04.2020

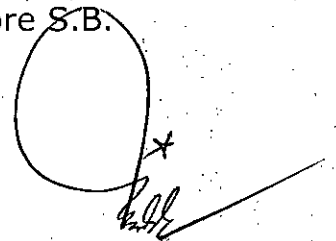
Due to COVID-19, the case is adjourned to 04.08.2020 for the same, before S.B.



Reader

04.08.2020

Mr. Muhammad Saddique, Advocate, junior to Mr. Muhammad Asif, Advocate learned counsel for the appellant is present. Stated that his senior counsel has gone to august Supreme Court of Pakistan at Islamabad. Formal request for adjournment. Adjourned to 27.10.2020. File to come up for preliminary hearing before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

13.11.2019

Counsel for the appellant present.

An application has been submitted praying for amendment in the memorandum of appeal and to implead Government of Khyber Pakhtunkhwa through Secretary Interior Department.

Since the appeal is at initial stage and is yet to be heard in motion, therefore, the application is allowed. The appellant may submit amended appeal on or before next date of hearing.

Adjourned to 17.12.2019 before S.B.


Chairman

17.12.2019

Appellant in person present.

Appellant requests for adjournment due to non-availability of his learned counsel owing to general strike of the Bar.

Adjourned to 28.01.2020 before S.B.


Chairman

28.01.2020




Appellant in person present. Clerk to counsel for the appellant present and submitted amended appeal placed on file. Lawyers community is on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjournment requested. Adjourn. To come up for preliminary hearing on 16.03.2020 before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1085/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/08/2019	<p>The appeal of Mr. Liaqat Ali presented today by Mr. Muhammad Ayaz Majid Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 23/8/19</p>
2-	26/08/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>03/10/19</u></p> <p> CHAIRMAN</p>
03.10.2019		<p>Mr. Muhammad Asif Advocate had submitted Vakalatnama on behalf of appellant and requests for adjournment in order to prepare the brief.</p> <p>Adjourned to <u>03.11.2019</u> before S.B.</p> <p> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

S.A.No. _____/2020

Liaqat Ali..... Appellant

VERSUS

Inspector General of Police and others Respondents

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1	Memo of appeal.		1-4
2	Application for condonation of delay with affidavit.		5-6
3	Addresses of the parties.		7
4	Copy of notification dt.22.04.2010	A	8
5	Copy of order dt.05.04.2018	B	9
6	Copy of letter dated 29.06.2019	C	10
7.	Copy of appeal dated 08.04.2019	D	11
8	Copy of letter dated 25.07.2019	E	12
9.	Wakalatnama		13

Liaqat Ali
Appellant

Through

Mohammad Asif
Muharimad Asif

Advocate Supreme Court

Off: 214 Syed Ahmad Ali Building

Near Taj Autos, Sunehri Masjid

Road, Peshawar Cantt.

Office No.091-5279292

Cell: 0302-8885187

0311-1934339

Dated: 28/1/2020

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

S.A.No. _____/2019

Liaqat Ali son of Hazrat Ali
R/o Mohallah Saini, Village and Post Office, Tordher,
Tehsil Lahor District Swabi..... *Appellant*

VERSUS

- 1) Inspector General of Police, Inspector General Police Office, Peshawar.
- 2) Additional Inspector General of Police (Establishment) Central Police Office, Peshawar.
- 3) Govt. of Khyber Pakhtunkhwa through Secretary Home, Civil Secretariat, Peshawar..... *Respondents*

AMENDED SERVICE APPEAL

UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 WHEREBY APPEAL FILED BY THE APPELLANT ON 08.04.2019 AGAINST HIS DISMISSAL ORDER DATED 05.04.2018 WAS NEITHER ACCEPTED NOR REJECTED AND THE APPELLANT WAS INFORMED THROUGH LETTER DATED 25.07.2019 WITH THE REMARKS "APPLICATION WAS PERUSED AND FACTS CHECKED, AFTER PERUSAL THE COMPETENT AUTHORITY HAS FILED THE APPLICATION".

Prayer:

On acceptance of this appeal, the order of respondents may kindly be set aside and the appellant may kindly be reinstated in service with all back benefits.

Respectfully Sheweth;

Respectfully Sheweth;

Appellant humbly submits as under:

- 1) That appellant was appointed as Junior Clerk in the respondent department vide order dated 22.04.2010. (Copy of appointment letter is already attached).
- 2) That all of a sudden on 05.04.2018 appellant was dismissed from service but appellant was neither informed regarding dismissal nor dismissal order was given to the appellant nor was dispatched at appellant's home address. (Copy of the dismissal order is already attached).
- 3) That on the other hand as the dismissal order was illegal, result of collusion, malafide and may be the same was issued to appoint someone else under political pressure, in place of appellant and to complete the formalities, filed an appeal on behalf of appellant with forged signature of appellant without the knowledge of appellant.
- 4) That the so-called appeal filed under the bogus signature of the appellant was dismissed on 28.06.2018 and was dispatched to the District Police Officer Swabi on 29.06.2018 with the direction to inform the appellant through local police at his home address in this regard but the appellant was never informed. (Copy of the so-called rejection of appeal is already attached).
- 5) That when appellant came to know regarding his dismissal approached the respondent and obtained the copy of dismissal order and filed an appeal immediately on 08.04.2019. (Copy of appeal is already attached).
- 6) That appellant was informed through letter dated 25.07.2019 regarding his appeal with the following remarks.

“Your application was perused and facts checked. After perusal the competent authority has filed the application”

(Photocopy of letter is already attached).

- 7) That aggrieved with, appellant filed the appeal in this Hon'ble Tribunal but due to typing mistake, with the permission instant appeal is being filed on the following grounds amongst the others.

GROUND:

- a. That the order of dismissal dated 05.04.2018 as well as order on appeal dated 25.07.2019 are illegal, against law and facts. Hence untenable in the eyes of law.
- b. That the respondents failed to appreciate the real point involved in the case in its true perspective. Hence have arrived at an incorrect conclusion.
- c. That before issuing the dismissal order neither any explanation, show cause notice or statement of allegations were issued to the appellant. Moreover, neither inquiry officer was appointed nor the appellant was personally heard.
- d. That respondents under malafide intention neither the dismissal order was issued to appellant nor the appellant was informed regarding the decision on forged appeal with bogus signature while in the decision it was clearly written to District Police Officer, Swabi.

“Please inform the applicant through local police at his home address in this regard”.
- e. That before issuing the dismissal order neither the service laws nor rules have been followed.
- f. That the dismissal order dated 05.04.2018 is forged, bogus and has been issued with malafide intention under pressure that is why it has not been mentioned that how days appellant was absent from duty while on the other hand appellant was never absent from duty.

- g. That appellant use to perform his duty on the oral orders of the officers where they issue the order on telephone or through personal message.
- h. That by issuing the illegal dismissal order the respondents have violated the fundamental rights of appellant and have exercised the powers not vested to him under the law.
- i. That it is very strange the departmental appeal filed by the appellant has neither been accepted nor rejected and thus has acted illegally.
- j. That the dismissal order dated 05.04.2018 and order dated 25.07.2019 are perversant and against the settled principle of law and justice and as such is liable to be set aside.

It is, therefore, requested that on acceptance of this appeal, the order of respondents may kindly be set aside and the appellant may kindly be reinstated in service with all back benefits along with any other remedy which this Hon'ble Tribunal deems fit and appropriate may also be awarded with costs.

Waqar
Appellant
Through *Mohammad Asif*
Muhammad Asif
Advocate,
Supreme Court of Pakistan
Off: 214 Syed Ahmad Ali Building
near Taj Autos, Sunehri Masjid
Road, Peshawar Cantt.
Cell: 0302-8885187
Off: 091-5279292

CERTIFICATE:

Certified as per information furnished by my client that no such like appeal has earlier been filed before this Hon'ble Tribunal.

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the accompanying appeal are true and correct and nothing has been concealed from this Hon'ble Court.



Muhammad Asif
Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

S.A.No. _____ /2019

Liaqat Ali Appellant

VERSUS

Inspector General of Police and others..... Respondents

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth;

Applicant submits as under:

- 1) That the above noted appeal has been instituted in this Hon'ble Court.
- 2) That applicant has filed the departmental appeal when applicant came to know regarding his dismissed and thus is within time.
- 3) That departmental appeal filed on 08.04.2019 has neither been accepted nor rejected which is very much clear from the letter dated 25.07.2019.
- 4) That in case if the appeal is time barred then the time may kindly be condoned and the appeal may kindly be decided on merit because delay is not on the part of the applicant. (Affidavit is given to this effect).
- 5) That prima facie applicant has a good case in his favour and in case time is not condoned petitioner would suffer an irreparable loss.

It is, therefore, requested that the time may kindly be condoned and the appeal may kindly be decided on merits.

Liaqat Ali
Appellant

Through

Mohammad Asif
Muhammad Asif
Advocate Supreme Court

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

PESHAWAR

S.A.No. _____ /2019

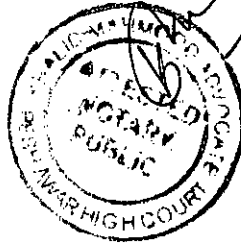
Liaqat Ali..... *Appellant*

VERSUS

Inspector General of Police and others*Respondents*

AFFIDAVIT

I, Liaqat Ali son of Hazrat Ali R/o Mohallah Saini, Village and Post Office, Tordher, Tehsil Lahor District Swabi do hereby affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Liaqat
Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

7

S.A.No. _____ /2019

Liaqat Ali..... *Appellant*

VERSUS

Inspector General of Police and others *Respondents*

ADDRESSES OF THE PARTIES

APPELLANT:

Liaqat Ali son of Hazrat Ali
R/o Mohallah Saini, Village and Post Office, Tordher,
Tehsil Lahor District Swabi

RESPONDENTS:

- 1) Inspector General of Police, Inspector General Police Office, Peshawar.
- 2) Additional Inspector General of Police (Establishment) Central Police Office, Peshawar.
- 3) Govt. of Khyber Pakhtunkhwa through Secretary Home, Civil Secretariat, Peshawar

Liaqat Ali
Appellant

Through

Muhammad Asif
Muhammad Asif
Advocate Supreme Court

Annex A (8)

FOR THE PUBLICATION IN NWFP POLICE GAZETTE PART-II
ORDERS BY THE PROVINCIAL POLICE OFFICER NWFP.

NOTIFICATION

Dated: 22/14/2010

No. 12937 /E-III, APPOINTMENT/POSTING: The following candidates are hereby appointed as Junior Clerks BPS-07 (3550-190-8850) purely on temporary basis in the NWFP. Police with effect from the date they actually reports for duty their at place of posting subject to medical fitness and verification of character and antecedents etc.

The condition of their services will be as under:-

1. Their services are liable to be terminated on 14 days notice without assigning any reason.
2. They will neither be confirmed as Junior Clerk nor considered for further promotion until and unless they passes typ: test/departmental training etc. during the period of their services as Junior Clerk failing which their services will be dispensed with. Transferred posting order will follow:

S.NO.	NAME, FATHER'S NAME & D	DMICILE
1.	Asim Ali Durani s/o Shamshad Khan	Durani Charsadda
2.	Bahadar Amir s/o Ahmad Fawad Kha	Kohat
3.	Muhammad Awais s/o Imtiaz Ahmad	Nowshera
4.	Shahid Rashid s/o Abdul Rashid Pesh	war
5.	Shehzad Khan s/o Munaf Gul Charsad	la
6.	Subhan Ali s/o Mir Ahmad Nowshera	
7.	Behramand Saeed Khan s/o Izat Khan	Peshawar
8.	Anjad Iqbal s/o Hashim Ali Khan Bu	ter
9.	Zuhaib Jan s/o Iqbalullah Charsadda	
10.	Sher Rehman s/o Siannaz Khan Pesh	war
11.	Zubair s/o Fazal Muhammad MKD A	ny
12.	Saud Khan s/o Dil Nawaz Khan Banr	a
13.	Aziz Ahmad s/o Ali Ahmad Mardan	
14.	Usman Yousaf s/o Naseer-ud-Din Ma	rdan
15.	Sahibullah s/o Ahmad Mardan	
16.	Sajid Ali Shah s/o Anwar Shah Chars	adda
17.	Amir Khan s/o Gul Amir Charsad	la
18.	Saifullah s/o Shewa Khan DIKhan	
19.	Arshad Ali s/o Dilwar Shah Peshaw	r
20.	Ikhtiar Ahmad s/o Kiramat Shah Cha	sadda
21.	Jan Alam s/o Ali Rehman Charsadda	
22.	Umar Muhammad s/o Abdul Karim M	ardan
23.	Jebrael s/o Ghulam Sadique Hangu	
24.	Muhammad Ismail s/o Muhammad A	mir Lakki
25.	Ghulamullah s/o Muhammad Sharif	Kohistan
26.	Jehanzeb s/o Ali Akbar Kohistan	
27.	Shah Wali Khan s/o Fazal Rehman	Hangu
28.	Shah Faisal s/o Shah Jehan Mard	an
29.	Iftikhar Ali s/o Nawar Khan Mardan	
30.	Fazal Amin s/o Khawas Khan Peshaw	ar
31.	Shaha Jamal s/o Shah Jehan Peshaw	r
32.	Qazi Bani Amir s/o Muhammad Far	ooq Peshawar
33.	Muhammad Bilal s/o Aslam Khan P	shawar
34.	Syed Fahad Ali Shah s/o Syed Farid	Ali Shah Peshawar
35.	Kalim-ud-Din s/o Ilyas-ud-Din Ha	ngu
36.	Bashir Muhammad s/o Naik Muham	mad Tank
37.	Zahidullah s/o Muhammad Ayaz La	kki
38.	Asmat Shuaib s/o Shazar Khan L	akki
39.	Sehail Raza s/o Raza Khan Charsad	la

ATTESTED

6329/C

PTO

(3-A)

40.	Muhammad Ismail s/o Zahid Shah Charsadda
41.	Sultan Muhammad s/o Saleh Muhammad Kohat
42.	Sheewar Shah s/o Shabir Hussain Abbottabad
43.	Asif Nawaz s/o Amir Nawaz Peshawar
44.	Kashif Irshad s/o Muhammad Irshad Karak
45.	Syed Mujib ullah Shah s/o Saad Hussain Manshehra
46.	Sulman Niaz s/o Niaz Muhammad Peshawar
47.	Amang Zeb s/o Gul Dad Khan Nowshera
48.	Muhammad Faisal s/o Nisar Muhammad Nowshera
49.	Usman Ahmad s/o Abdul Khalq Peshawar
50.	Kifayatullah s/o Ghulam Muhammad Peshawar
51.	Muhammad Nabi s/o Muhammad Khan Chitral
52.	Muhammad Yasin s/o Yousaf Ali Charsadda
53.	Aminul Sakbar s/o Sakbar Khan Swabi
54.	Kifayatullah s/o Muhammad Aslam Khan Tank
55.	Mehboobullah s/o Habibullah Peshawar
56.	Muhammad Adil s/o Fazal Subhan Peshawar
57.	Noor Rahim s/o Gul Korodin Hardan
58.	Abdur Rehman s/o Ahmad Yaqub Chitral
59.	Zarwali s/o Siraj Wali Peshawar
60.	Liaqat Ali s/o Hazrat Ali Peshawar
61.	Saad Israr Shinwari s/o Israr Muhammad Shinwari Kohat
62.	Rahatullah Cook Elite Force (Cow Chapal Factory)
63.	Jan Muhammad s/o Gul Amir Afghan Colony Peshawar
64.	Munfarid s/o Mir Qasim Shah Peshawar
65.	Muhammad Kashif s/o Haji Khata Gul Charsadda



(QUDRATULLAH KHAN MARWAT)
DIG/HQps:
For Provincial Police Officer,
NWFP, Peshawar.

No. 10939-49 IE-III Dated Peshawar, the 22/11/2010.

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

1. Additional Inspector General of Police, Investigation, with two spare copy for Gazette notification NWFP, Peshawar.
2. Capital City Police Officer, Peshawar.
3. All Regional Police Officers in NWFP.
4. Office Supdt: Secret CPO Peshawar.
5. Office Supdt: Establishment, CPO Peshawar.

ATTESTED

**FOR THE PUBLICATION IN NWFP POLICE GAZETTE PART-II
ORDERS BY THE PROVINCIAL POLICE OFFICER NWFP.**

NOTIFICATION

Dated: 22/4 /2010

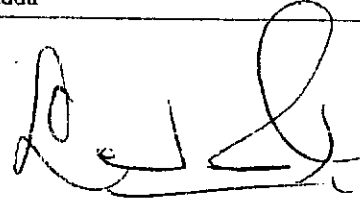
No 10937 /E-III, APPOINTMENT/POSTING: The following candidates are hereby appointed as Junior Clerks BPS-07 (3530-190-8850) purely on temporary basis in the NWFP, Police with effect from the date they actually reports for duty their at place of posting subject to medical fitness and verification of character and antecedents etc.

The condition of their services will be as under:-

1. Their services are liable to be terminated on 14 days notice without assigning any reason.
2. They will neither be confirmed as Junior Clerk nor considered for further promotion until and unless they passes type test/departmental training etc, during the period of their services as Junior Clerk failing which their services will be dispensed with. Transferred posting order will follow:

S.NO.	NAME, FATHER'S NAME & DOMICILE
1.	Asim Ali Durani s/o Shamshad Khan Durani Charsadda
2.	Bahadar Amir s/o Ahmad Fawad Khan Kohat
3.	Muhammad Awais s/o Imtiaz Ahmad Nowshera
4.	Shahid Rashid s/o Abdul Rashid Peshawar
5.	Shehzad Khan s/o Munaf Gul Charsadda
6.	Subhan Ali s/o Mir Ahmad Nowshera
7.	Behramand Saeed Khan s/o Izat Khan Peshawar
8.	Amjad Iqbal s/o Hashim Ali Khan Buner
9.	Zuhaib Jan s/o Inayatullah Charsadda
10.	Sher Rehman s/o Shamroz Khan Peshawar
11.	Zubair s/o Fazal Muhammad MKD Agy
12.	Saud Khan s/o Dil Nawaz Khan Bannu
13.	Aziz Ahmad s/o Ali Ahmad Mardan
14.	Usman Yousaf s/o Naseer-ud-Din Mardan
15.	Subhan Ali s/o Mir Ahmad Nowshera
16.	Sajid Ali Shah s/o Anwar Shah Charsadda
17.	Amir Khan s/o Gul Amir Charsadda
18.	Saifullah s/o Shewa Khan DIKhan
19.	Arshad Ali s/o Dilawar Shah Peshawar
20.	Ikhtiar Ahmad s/o Kiramat Shah Charsadda
21.	Jan Alam s/o Ali Rehman Charsadda
22.	Umar Muhammad s/o Abdul Karim Mardan
23.	Jebrail s/o Ghulam Saddique Hangu
24.	Muhammad Ismail s/o Muhammad Amir Lakki
25.	Ghulamullah s/o Muhammad Sharif Kohistan
26.	Jehanzeb s/o Ali Akbar Kohistan
27.	Shah Wali Khan s/o Fazal Rehman Hangu
28.	Shah Faisal s/o Shah Jehan Mardan
29.	Ifikhar Ali s/o Nawar Khan Mardan
30.	Fazal Amin s/o Khawas Khan Peshawar
31.	Shaha Jamal s/o Shah Jehan Peshawar
32.	Qazi Bani Amin s/o Muhammad Farooq Peshawar
33.	Muhammad Bilal s/o Aslam Khan Peshawar
34.	Syed Fahad Ali Shah s/o Syed Farid Ali Shah Peshawar
35.	Kalim-ud-Din s/o Ilyas-ud-Din Hangu
36.	Bashir Muhammad s/o Naik Muhammad Tank
37.	Zahidullah s/o Muhammad Ayaz Lakki
38.	Asmat Shuaib s/o Shazar Khan L/ Dir
39.	Sohail Raza s/o Raza Khan Charsadda

40.	Muhammad Ismail s/o Zahir Shah Charsadda
41.	Sultan Muhammad s/o Saleh Muhammad Kohat
42.	Sheewar Shah s/o Shabir Hussain Abbottabad
43.	Asif Nawaz s/o Amir Nawaz Peshawar
44.	Kashif Irshad s/o Muhammad Irshad Karak
45.	Syed Mujib ullah Shah s/o Sadiq Hussain Mansehra
46.	Sulman Niaz s/o Niaz Muhammad Peshawar
47.	Aurang Zeb s/o Gul Dad Khan Nowshera
48.	Muhammad Faisal s/o Nisar Muhammad Nowshera
49.	Usman Ahmad s/o Abdul Khaliq Peshawar
50.	Kifayatullah s/o Ghulam Muhammad Peshawar
51.	Muhammad Nabi s/o Muhammad Khan Chitral
52.	Muhammad Yasin s/o Yousaf Ali Charsadda
53.	Aminul Sakbar s/o Sakbar Khan Swabi
54.	Kifayatullah s/o Muhammad Aslam Khan Tank
55.	Mehboobullah s/o Habibullah Peshawar
56.	Muhamad Adil s/o Fazal Subhan Peshawar
57.	Noor Rahim s/o Gul Rorodin Mardan
58.	Abdur Rehman s/o Ahmad Yar Chitral
59.	Zarwali s/o Siraj Wali Peshawar
60.	Liaqat Ali s/o Hazrat Ali Peshawar
61.	Saad Israr Shinwari s/o Israr Muhammad Shinwari Kohat
62.	Rahatullah Cook Elite Force (Now Chapal Factory)
63.	Jan Muhammad s/o Gul Amir Afghan Colony Peshawar
64.	Munfarid s/o Mir Qasim Shah Peshawar
65.	Muhammad Kashif s/o Haji Khaista Gul Charsadda



(QUDRATULLAH KHAN MARW

DIG/HQrs:

For Provincial Police Officer,
NWFP, Peshawar.

No. 19938-49 /E-III Dated Peshawar, the 22/11/2010.

Copy of above is forwarded for information and necessary action to

1. Additional Inspector General of Police, Investigation, with two spare for Gazette notification NWFP, Peshawar.
2. Capital City Police Officer, Peshawar.
3. All Regional Police Officers in NWFP.
4. Office Supdt: Secret CPO Peshawar.
5. Office Supdt: Establishment, CPO Peshawar.

Annex B, 9

(12)

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

Ph: 091-9210545 Fax: 091-9210927 Email: OSEstabV@gmail.com

No. 1984-92 /E-V, dated, Peshawar the, 5.04.2018.

ORDER.

Junior Clerk Liaqat Ali has absented himself from his Lawful duty deliberately and intentionally without any cogent reason. He was directed time and again to assume his duty abruptly but in vain. His lethargic attitude has shown that he is not interested to continue further his duty in Police Department.

After completion all codal formalities and aspects adopted/followed in the matter of his absence accordingly, therefore he is dismissed from the service with immediate effect.

Order announced.

(AHSAN SAIFULLAH) PSP/
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & date even.

Copy forwarded to the: -

1. Addl: Inspector General of Police HQrs: CPO, Peshawar.
2. Accountant General Khyber Pakhtunkhwa.
3. Deputy Inspector General of Police HQrs, CPO, Peshawar.
4. PA to the Assistant Inspector General of Police: Estt: CPO Peshawar.
5. Registrar, CPO Peshawar.
6. Office Supdt: Secret Branch CPO Peshawar.
7. Office Supdt: CPB, CPO Peshawar.
8. Incharge Central Registry Cell.
9. Accountant CPO Peshawar.

A.S.
ATTESTED

Annex C (10)



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

Ph: 091-9210545 Fax: 091-9210927 Email: OSEstabV@gmail.com

No. 3165 /E-V, dated, Peshawar the 29 /06.2018.

To: - The District Police Officer,
Swabi.

Subject: - DEPARTMENTAL APPEAL.

Memo:- Ex-Junior Clerk Liaqat Ali s/o Hazarat Ali r/o Mohallah Sani Tor dher Tehsil Lahore District Swabi Cell No. 0332-9004544 has submitted departmental appeal on 04.06.2018 against his dismissal order No 1984-92/E-V, dated 05.04.2018 which was examined in detail and found badly time barred, hence the competent authority rejected his appeal. Please inform the applicant through local Police at his home address in this regard.

Attest
ATTESTED

(IRFAN ULLAH KHAN) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

cl u
28/6/18

Annex D

(11)

08.04.2019

The Inspector General of Police
Government of Khyber Pakhtunkhwa
Peshawar

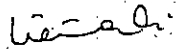
Subject: Appeal for reinstatement in service as Junior Clerk

Sir,

Respectfully it is stated that I was appointed as Junior Clerk in the year 2010 on the basis of merit. I continued performing my duties as clerk in CPO for a number of years to the utmost satisfaction of my ministerial branch. No one was dissatisfied with my duties and performance and hence there was no complaint against me. By the end of year 2017, on the basis of some jealous, false and malignant complaint against me, I was terminated from service without proper Enquiry.

I was not given a proper opportunity for personal hearing and clarification. Immediately after my termination from service, I lodged appeal to the competent authority but unfortunately the same was also hushed up by hidden hands. Sir, I am a poor person and have no means of livelihood. You being a sympathetic and kind officer, I beseech your honour to reinstate me from the date of removal from service. My parents, myself and entire family will pray day-in and day-out for your long life, with sound health and safety.

Sincerely and obediently,


Liaquat Ali

Ex Junior Clerk

0332-9004544

Azil
ATTESTED



Annex E
OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927

(12)

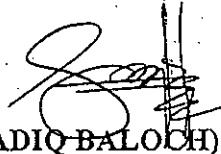
No. 3153 /E-V dated Peshawar the, 25-07 /2019

To: - Mr. Laiqat Ali Ex-Junior Clerk
r/o r/o Mohallah Sani Tor Dher,
Tehsil Lahore, District Swabi



Subject: - APPEAL FOR REINSTATEMENT IN SERVICE AS JUNIOR CLERK.

Memo:-

Reference your application dated 08.04.2019, you are hereby informed that your application was perused and facts checked. After perusal, the competent authority has filed the application.


(SADIQ BALOCH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

ATTESTED
A.S.P.

50 روپے	20410	PESHAWAR BAR ASSOCIATION PBA		
ایڈوکیٹ: محمد امیر صاحب / سلمان خان		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: Be-18-1898		رابطہ نمبر: 0336-9570095		

سرمدی گروپل لیسٹور

بعدالت جناب:

منجانب: صدی - Petb Gment	دعوی:
بنام	علت نمبر:
سرکار	مورخہ:
	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام لیسٹور کیلئے محمد امیر صاحب / سلمان خان کو وکیل 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 بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق و زبیں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 23/8/19
المواہد

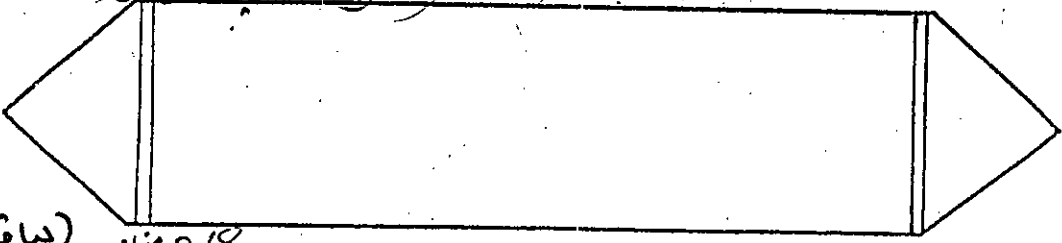
مقام لیسٹور کے لیے منظور ہے۔

Starkly
Empred

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

باعت علی وکالت لیسٹور سلمان محمد امیر صاحب لیسٹور
16801-2408174-9
10891-18048-6

بعد الت جہاد سبزی ٹریڈنگ کے نام



2/19 جناب (بیعت علی)

بیعت علی بنام گوڈنٹ/جولس

موضوعہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

انڈیا صدر ہدایت اور کوٹ مہتمم کورٹ آف پاکستان
انڈیا صدر ہدایت اور کوٹ مہتمم کورٹ آف پاکستان

ذیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک در و سپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار 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 بالا اختیار حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر چنانچہ تقرر کے سبب سے وہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پلانڈ ہوں گے۔ کہ پیروی کے مذکور کریں۔ لہذا ادا کالت نامہ لکھد یا کہ سندر ہے۔

المرقوم 03 ماہ 20

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بمقام کے لئے منظور ہے۔

نہایتاً

میرزا آصف علی خان

سید احمد علی خان
گورنمنٹ ہائی اسکول
لاہور

تاج آباد سیری فورس

روڈ ٹاؤن شپ لاہور

ph: 091-527 92 92

mob: 0302-8885187

0332-8885187

0313-9199364

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

Service Appeal No. 1085/2019

Liaqat Ali..... (Appellant)

VERSUS


Inspector General of Police, KP etc.....(Respondents)

The undersigned on behalf of respondents No. 1 to 3 submits as under:-

1. That, the above mentioned Service Appeal was submitted in the Honorable Khyber Pakhtunkhwa, Service Tribunal Peshawar in the year 2019.
2. That, the respondent department was not aware from the instant Service Appeal.
3. That, the representative of respondent department collected the documents pertaining to instant Service Appeal on the last date of hearing.
4. That, the Honorable Tribunal, Khyber Pakhtunkhwa, Peshawar has denied the right of respondent department for submission of Para-wise comments.
5. That, the instant case is fixed for hearing on 16.09.2022, for arguments.

PRAYERS:-

Keeping in view the above, it is therefore, requested that the respondents may be allowed for submission of Para-wise comments in best interest of natural justice, please.


16-09-2022

DSP/ LEGAL,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

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

Service Appeal No. 1085/2019

Liaqat Ali..... (Appellant)

VERSUS

IGP, KP etc.....(Respondents)

INDEX

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Para-wise comments		1-3
2.	Affidavit		4
3.	Authority Letter		5
4.	Copy of Letter No. 1984-92/E-V, dated 05.04.2018	A	6
5.	Copy of Letter No. 3165/ E-V, dated 29.06.2018	B	7

Respondents through



DSP/ Legal
CPO, Peshawar

①

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

Service Appeal No. 1085/2019

Liaqat Ali..... (Appellant)

VERSUS

IGP, KP etc.....(Respondents)



REPLY BY RESPONDENTS NO. 1 TO 3

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the appeal is not based on facts.
- b) That the appeal is barred by law and limitation.
- c) That the appeal is not maintainable in the present form.
- d) That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
- e) That the appellant is estopped to file the instant appeal by his own conduct.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.
- g) That the appellant has got no cause of action and locus standi to file the instant Service Appeal.

FACTS:-

1. Pertains to appointment and service record of the appellant needs no comments.
2. Incorrect. The appellant was proceeded against departmentally on account of his absence from his lawful duty deliberately and intentionally without any cogent reason. He was directed time and again to assume his duty abruptly but in vain. His lethargic attitude has shown that he was not interested to continue further his duty in Police Department. Therefore, after completion of all codal formalities he was dismissed from service vide order No. 1984-92/ E-V, dated 05.04.2018. (Copy of order is enclosed as "A").

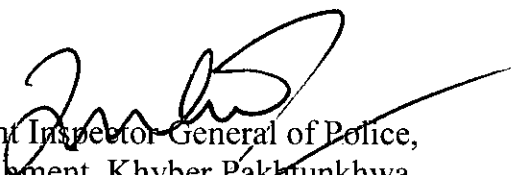
3. Incorrect. The departmental punishment order was quite legal and in accordance with law/ rules furthermore, no malafide has been involved in the case of appellant. The departmental appeal of the appellant was rejected being time barred and directions in this respect was issued to District Police Officer, Swabi to inform him at his home address through local Police vide this office Letter No. 3165/ E-V, dated 29.06.2018. (Copy of Letter is enclosed as "B").
4. Incorrect and misleading one. As already explained in preceding Para.
5. Incorrect. As already explained in Para No. 3 of Facts.
6. Correct. It is worth to add here that departmental appeal was rejected being time barred.
7. The instant Service Appeal of the appellant is not maintainable on the following Grounds.

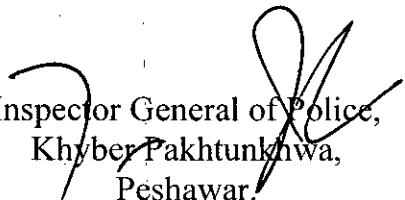
GROUND:-


- A. Incorrect. The orders passed by the authorities are quite legal, in accordance with law/ facts hence, tenable in the eyes of law.
- B. Incorrect. The appellant was proceeded against departmentally on account of his willful absence therefore, he was dealt in accordance with law/ rules.
- C. Incorrect.
- D. Incorrect. As already explained above no malafide has been committed by the answering respondents.
- E. Incorrect. The order was passed in accordance with law/ rules.
- F. Incorrect. The appellant was proceeded against departmentally on the charges of willful absence without prior permission of competent authority.
- G. Incorrect and misleading one.
- H. Incorrect. No fundamental rights of the appellant have been violated by the answering respondents.
- I. Incorrect. The departmental appeal was rejected being time barred hence, no illegality act exist on part of the answering respondents
- J. Incorrect. The departmental orders passed by the authorities are quite in accordance with law, principle of law and justice.

PRAYER:-

Keeping in view the above stated facts and circumstances, it is therefore humbly prayed that the appeal is not maintainable being devoid of merits hence, may kindly be dismissed with costs, please.


Assistant Inspector General of Police,
Establishment, Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 2)


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


Secretary,
Government of Khyber Pakhtunkhwa,
Home & TAs Department, Peshawar.
(Respondent No. 3)

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

Service Appeal No. 1085/2019

Liaqat Ali..... (Appellant)

VERSUS

IGP, KP etc.....(Respondents)

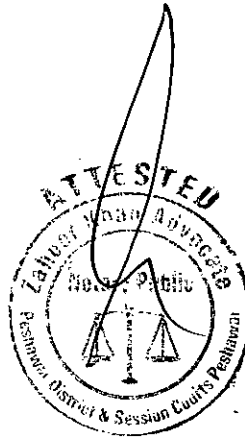
AFFIDAVIT

I, Tariq Umar DSP/ Legal CPO, Peshawar do hereby solemnly affirm on oath that the contents of accompanying comments on behalf of Respondents are correct to the best my knowledge and belief. Nothing has been concealed from this Honorable Tribunal.

DEPONENT

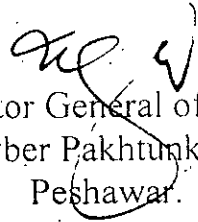


(TARIQ UMAR)
DSP/ Legal,
CPO, Peshawar.
17301-4997553-7
0333-8878882



AUTHORITY LETTER

Mr. Tariq Umar ~~DSP~~ / Legal, CPO is authorized to pursue the cases pertaining to Police Department in Honorable Peshawar High Court, Peshawar submission of Para-wise comments/ reply in Court on behalf of undersigned, please.


Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

(12) (6) Am Khan: "A" (4)

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

Ph: 091-9210545 Fax: 091-9210927 Email: OSEstabV@gmail.com

No. 1984-92 /E-V, dated, Peshawar the, 5/04.2018.

ORDER.

Junior Clerk Liaqat Ali has absented himself from his Lawful duty deliberately and intentionally without any cogent reason. He was directed time and again to assume his duty abruptly but in vain. His lethargic attitude has shown that he is not interested to continue further his duty in Police Department.

After completion all codal formalities and aspects adopted/ followed in the matter of his absence accordingly, therefore he is dismissed from the service with immediate effect.

Order announced.

(AHSAN SAIFULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & date even.

Copy forwarded to the: -

1. Addl: Inspector General of Police HQrs: CPO, Peshawar.
2. Accountant General Khyber Pakhtunkhwa.
3. Deputy Inspector General of Police HQrs, CPO, Peshawar.
4. PA to the Assistant Inspector General of Police: Estt: CPO Peshawar.
5. Registrar, CPO Peshawar.
6. Office Supdt: Secret Branch CPO Peshawar.
7. Office Supdt: CPB, CPO Peshawar.
8. Incharge Central Registry Cell.
9. Accountant CPO Peshawar.

ATTESTED

Annex B

(7)

[Handwritten signatures and initials]



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

Ph: 091-9210545 Fax: 091-9210927 Email: OSEstabV@gmail.com

No. 3165 /E-V, dated, Peshawar the 09 / .06 .2018.

To: - The District Police Officer,
Swabi.

Subject: - DEPARTMENTAL APPEAL.

Memo:-
Ex-Junior Clerk Liaqat Ali s/o Hazarat Ali r/o Mohallah Sani Tor dher Tehsil Lahore District Swabi Cell No. 0332-9004544 has submitted departmental appeal on 04.06.2018 against his dismissal order No 1984-92/E-V, dated 05.04.2018 which was examined in detail and found badly time barred, hence the competent authority rejected his appeal. Please inform the applicant through local Police at his home address in this regard.

ATTESTED

[Handwritten signature]
22/6/18

(IRFAN ULLAH KHAN) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

BEFORE THE CHAIRMAN KPK SERVICES TRIBUNAL PESHAWAR

S.A.No.1085/2019

Liaqat Ali.....V/S.....I.G.P.

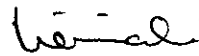
APPLICATION FOR AMENDMENT IN FACTS
AND GROUNDS OF APPEAL AS WELL AS
TO IMPLEAD GOVT. OF K.P.K THROUGH
SECRETARY INTERIOR, CIVIL
SECRETARIAT, PESHAWAR AS PARTY IN
THE ARRAY OF RESPONDENTS.

Respectfully Sheweth;

Appellant submits as under:

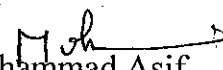
- 1) That the above noted appeal is fixed for today i.e. 13.11.2019.
- 2) That inadvertently in appeal the facts and grounds have not been properly mentioned. Moreover, Govt. of K.P.K. through Secretary Interior, Civil Secretariat, Peshawar has not been impleaded in the array of respondents.
- 3) That appellant wants to file amended appeal by mentioning/ writing proper facts and grounds as well as impleading Govt. of K.P.K. through Secretary Interior, Civil Secretariat, Peshawar in the array of respondents as necessary party.

It is, therefore, requested that appellant may kindly be allowed to file the amended appeal as well as add Govt. of K.P.K. through Secretary Interior, Civil Secretariat, Peshawar in the array of respondents being necessary party.



Appellant

Through


Muhammad Asif

Advocate, Peshawar



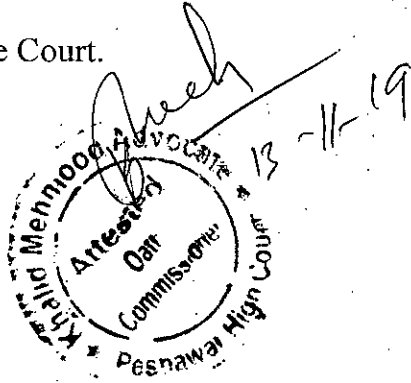
BEFORE THE CHAIRMAN KPK SERVICES TRIBUNAL PESHAWAR

S.A.No.1085/2019

Liaqat Ali.....V/S.....I.G.P.

AFFIDAVIT

I, Liaqat Ali son of Hazrat Ali R/o Mohallah Saini, Tor Dher, Tehsil Lahor District Swabi (appellant), do hereby affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



Liaqat Ali

Deponent
CNIC No.16201-2428174-9