

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No.3439/2021

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 5765
1/16/2028

Hidayat Ullah Constible No.98Appellant

Versus

The Deputy Inspector General of Police & othersRespondents.

**APPLICATION FOR ADDITIONAL PRAY TO THE EFFECT
THAT ORDER OF THE INSPECTOR GENERAL OF POLICE
DATED 22-02-2022 PASSED IN REVISION PETITION U/R 11 (c)
OF THE KHYBER PAKHTUNKHWA POLICE RULES, 1975
MAY KINDLY BE SET ASIDE AND THE INTERVENING
PERIOD MAY KINDLY BE TREATED AS ON ACTIVE DUTY
WITH ALL ATTACHED BENEFITS.**

Respectfully Sheweth,

The applicant humbly submits as under,

1. That the titled service appeal is pending before this Hon'ble Tribunal and fixed for final arguments today.
2. That applicant had submitted revision petition under rule 11 of the Police Rules, 1975 which has been decided by the Hon'ble respondent and the same is available with the reply of the answering respondents.
3. That the impugned order of the Inspector General of Police dated 22-02-2022 has been passed during the pendency of the instant service appeal and that's why the same was not impugned before this Hon'ble Tribunal.
4. That it is necessary for proper disposal of the appeal to impugned the impugned order of the Inspector General of Police, Khyber Pakhtunkhwa.

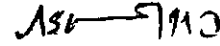
In view of the above submissions, it is humbly requested that the impugned order dated 22-02-2022 passed by Inspector General of Police, Khyber Pakhtunkhwa in revision petition

under rule 11 (c) of the Police Rules, 1975 may kindly be set aside and the appellant may be reinstated in service with all back benefits and the intervening period may kindly be treated as on active service.



Appellant

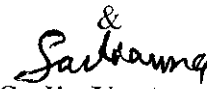
Through



Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan



Ali Bakht Mughal
Advocate, Peshawar



Sadia Umar
Advocate, Peshawar

Dated: 30 / 5 / 2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.3439/2021

Hidayat Ullah Constible No.98Appellant.

Versus

The Deputy Inspector General of Police & othersRespondents.



**APPLICATION FOR IMPLEADMENT OF INSPECTOR
GENERAL OF POLICE IN THE PANEL OF
RESPONDENTS.**

Respectfully Sheweth,

The applicant humbly submits as under,

1. That the titled service appeal is pending before this Hon'ble Tribunal and fixed for final arguments today.
2. That applicant had submitted revision petition under rule 11 of the Police Rules, 1975 which has been decided by the Hon'ble respondent and the same is available with the reply of the answering respondents.
3. That since the order of Inspector General of Police has been made part of the titled service appeal therefore, it is necessary to array him as necessary party.

In view of the above submissions, it is humbly requested that Inspector General of Police, Khyber Pakhtunkhwa may be arrayed as party.


 Applicant
 Through

 Ashraf Ali Khattak
 Advocate,
 Supreme Court of Pakistan

Dated: 30 / 6 / 2023


 Ali Bakht Mughal
 Advocate, Peshawar

14.04.2023

Appellant alongwith his counsel present.

Asif Masood Ali Shah learned Deputy District Attorney for respondents present.

Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 29.05.2023 before D.B. Parcha Peshi given to the parties.

Mutazem Shah

(Fareeha Paul)
Member (E)

(Rozina Rehman)
Member (J)

29th May, 2023

1. Learned counsel for appellant present. Mr. Muhammad Jan, District Attorney for respondents present.

2. When confronted with the situation by the learned District Attorney that the Appellate Board had modified the impugned order and the intervening period was treated as leave of the kind due if any on his credit, the learned counsel wants to make two applications one for amendment in the appeal and another to implead Inspector General of Police, Khyber Pakhtunkhwa as party. He may do so within two days. If applications are moved within two days, both of the same shall be deemed to have been allowed subject to limitation and restrictions/objections of the other side thereby permitting the appellant to file amended appeal within next five days. Copy of the same be handed over to the learned District Attorney/respondents, who are at liberty to file comments/amended comments but a week before the next date. The next date in the matter is 22.08.2023 before D.B for arguments. P.P given to the parties.

Mutazem Shah

(Muhammad Akbar Khan)
Member (E)

(Kalim Arshad Khan)
Chairman

Date of Presentation of Application 01/6/23

Number of Words 150

Copying Fee 5/-

Urgent 5/-

Total 10/-

Name of C

01/6/23

Date of C

01/6/23

Address of C