

25th May, 2022

Counsel are informed telephonically for 10/08/2022

None for the appellant present. Mr. Muhammad Rashid, DDA for respondents present.

This appeal was heard by my predecessor and Mr. Salah-Ud-Din, Member (Judicial) on 25.11.2021. It is appropriate that this appeal be heard by the bench comprising of Mr. Salah-Ud-Din, Member (Judicial). To come up for arguments on 10.08.2022 before D.B. Notices be issued to the appellant and his counsel for the date fixed.



(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman

10-8-2022

Proper DB not available the case is adjourned to 4-10-2022

*LC
Reader*

4th Oct, 2022

None for the appellant present. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

On 25.05.2022 it was directed that the appeal was heard by Mr. Salah Ud Din, learned Member (Judicial), therefore, it was directed to be place before a bench of which Mr. Salah Ud Din, learned Member (Judicial) is a member. Office is directed to fix this case before the bench of which Mr. Salah Ud Din, learned Member (Judicial) is part. To come up for arguments on 05.12.2022 before the D.B



(Fareeha Paul)
Member(Executive)



(Kalim Arshad Khan)
Chairman

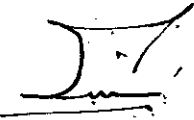
S.A No. 688/2017

, Syed Inayat Ali Shah

25.11.2021

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Muhammad Khalil, S.I (Legal) for official respondents No. 1 & 2 and learned counsel for private respondents No. 3, 4 & 7 present.

Arguments at some length heard. However during the course of arguments it came to the notice of this Tribunal that similar nature of Service Appeal bearing No. 1633/2019 titled "Ijaz Ahmed Versus Police Department", having identical questions of law and facts, is pending for adjudication at Principal seat Peshawar, therefore, instant service appeal is also transferred to Principal Seat Peshawar. Case to come up for arguments on 03.03.2022 before the D.B at Peshawar.


(Salah-ud-Din)
Member (J)
Camp Court D.I.Khan


Chairman
Camp Court D.I.Khan

03.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.


Reader.

23.02.2021

Appellant present through counsel.

Noor Zaman Khattak learned District Attorney for official respondents present. Counsel for private respondents No.3, 4 & 7 present.

Former made a request for adjournment. Adjourned. To come up for arguments on 26.05.2021 before D.B at Camp Court, D.I.Khan.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, D.I.Khan



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

*Due to covid, 19 therefore to
come up for the same on 29/9/21*



lead

29.09.2021

Learned counsel for the appellant present. Mr. Usman Ghani, District Attorney for official respondents No. 1 & 2 present. Learned counsel for private respondents No. 3, 4 & 7 present and requested for adjournment on the ground that he has not met preparation for arguments. Adjourned. To come up for arguments before the D.B on 25.11.2021 at Camp Court D.I.Khan.



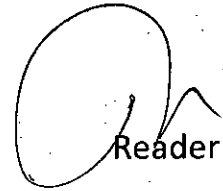
(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)
CAMP COURT D.I.KHAN



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

22.12.2020

Due to Pandemic of Covid-19, the case is adjourned to
22.02.2021 for the same.




Reader

22.02.2021

Appellant present through counsel.

Noor Zaman Khan Khattak learned District Attorney for
official respondents present. Counsel for private respondents
No.3, 4 & 7 present.

Former made a request for adjournment. Adjourned. To
come up for arguments on 23.02.2021 before D.B at Camp
Court, D.I. Khan.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, D.I Khan

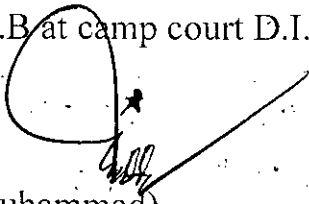


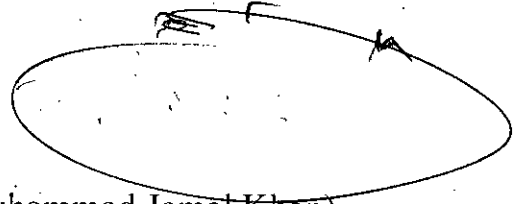
(Rozina Rehman)
Member (J)
Camp Court, D.I Khan

28.10.2020

Assistant to counsel for the appellant is present. Mr. Usman Ghani, District Attorney for respondents is present.

Since the Members of the High Court as well as of the District Bar Association D.I.Khan are observing strike today, therefore, the case is adjourned to 25.11.2020 for arguments before D.B at camp court D.I.Khan.


(Mian Muhammad)
Member(E)

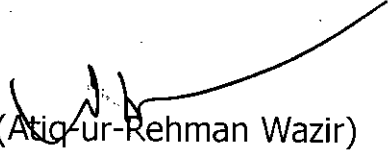

(Muhammad Jamal Khan)
Member(J)
Camp Court D.I Khan


25.11.2020

Counsel for appellant present.

Muhammad Jan learned Deputy Attorney for respondents present.

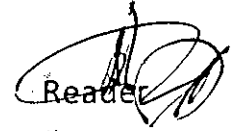
Former made a request for adjournment. Adjourned. To come up for arguments on 22.12.2020 before D.B at Camp Court, D.I.Khan.


(Atiq-ur-Rehman Wazir)
Member (E)
Camp Court, D.I Khan


(Rozina Rehman)
Member (J)
Camp Court, D.I Khan

25.3 .2020

Due to COVID19, the case is adjourned to
21/4/2020 for the same as before.

Reader 

21.4.2020

Due to COVID 19, the case is
adjourned to 23-4-2020 for the
same as before.





23.09.2020

Counsel for appellant present.

Mr. Usman Ghani, learned District Attorney alongwith
Muhammad Khalil S.I for official respondent No. 1 & 2 present.
Counsel for private respondent No. 3, 4 & 7 present.

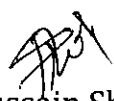
Later requests for adjournment; adjourned. To come up
for arguments on 28.10.2020 before D.B at Camp Court D.I
Khan.



(Atiq-ur-Rehman Wazir)
Member (E)
Camp Court, D.I Khan


(Rozina Rehman)
Member (J)
Camp Court, D.I Khan

27.01.2020

Due to strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Khalil, S.I (Legal) for official respondents present. Adjourned to 24.02.2020 for arguments before D.B at Camp Court D.I.Khan.



(Hussain Shah)
Member
Camp Court D.I.Khan


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

24.02.2020

Counsel for the appellant present. Mr. Usman Ghani, District Attorney for official respondents and counsel for private respondents no. 3,4 and 7 present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 25.03.2020 before D.B at camp court D.I.Khan.


Member


Member
Camp Court D.I.Khan

26.08.2019

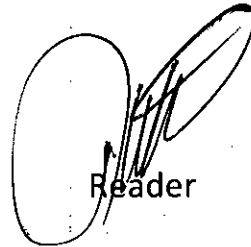
None present on behalf of the appellant. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Khalil Ahmad, S.I (Legal) for official respondents No. 1 & 2 and private respondent No. 4 in person present. Joint written replies on behalf of official respondent No. 1 & 2 as well as private respondent No. 3 have already submitted. Private respondent No. 4 submitted written reply on his behalf as well as on behalf of respondent No. 7 today. Private respondents No. 6 & 8 to 18 are already placed ex-parte vide order sheet dated 22.01.2019. Case to come up for rejoinder and arguments on 21.10.2019 before D.B. at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

21/10/2019

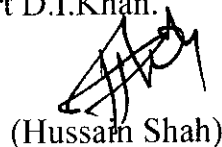
Since tour to D.I.Khan has been cancelled .To come for the same on 26/11/2019.



Reader

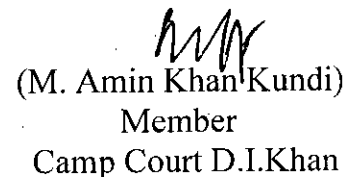
26.11.2019

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Khalid Nawaz, Inspector (Legal) for official respondents No. 1 & 2 present. Private respondents No. 4 & 7 are absent therefore, notices be issued to them for attendance and arguments for 27.01.2020 before D.B at Camp Court D.I.Khan.



(Hussam Shah)

Member
Camp Court D.I.Khan



(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

22.04.2019

Clerk to counsel for the appellant and Mr. Farhaj Sikandar learned District Attorney alongwith Khalid Nawaz Inspector for official respondents present. Learned counsel for private respondent No.7 present. Private respondents No.4 in person present. Rooh Ullah Head Clerk present as representative of respondent No.3. Learned counsel for private respondent No.7 and private respondent No.4 seek time to furnish written reply/comments. Adjourn. To come up for written reply/comments on 24.06.2019 before S.B at Camp Court, D.I.Khan.



Member
Camp Court, D.I.Khan.

24.06.2019

Appellant in person present. Mr. Farhaj Sikandar learned Deputy District Attorney alongwith Mr. Atta Ullah Khan, S.I (legal) for official respondents No. 1 & 2, junior counsel for private respondent No. 3 and counsel for private respondents No. 4 & 7 present. Written reply already submitted on behalf of respondents No. 1 & 2. Junior to counsel for the private respondent No.3 submitted written reply today. Counsel for private respondents No. 4 & 7 requested for further time to file written reply. Last opportunity is granted. To come up for written reply/comments on behalf of private respondents No. 4 & 7 on 26.08.2019 before S.B. at Camp Court, D.I Khan.



(M. Amin Khan Kundi)

Member

At Camp Court, D.I. Khan

688/2017

22.01.2019

Counsel for the appellant, Mr. Farhaj Sikandar, District Attorney alongwith Khalid Nawaz, Inspector (Legal) for official respondents and Mr. Muhammad Abdullah Baloch, Advocate for private respondents No. 4 and 7 present. The private respondents No. 6 and 8 to 18 are placed ex-parte being absent.

Learned counsel for private respondents No. 4 & 7 requests for time to submit reply/comments to the appeal. May do so on the next date. Adjourned to 26.02.2019 before S.B at camp court, D.I.Khan.



Chairman
Camp Court, D.I.Khan

26.02.2019


Counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Khalid Nawaz, Inspector (Legal) for official respondents No. 1 & 2 and counsel for private respondents No. 4 present. Mr. Waqar Alam, Advocate on behalf of private respondent No. 7 also present and submitted Vakalat Nama. None present on behalf of private respondent No. 3 therefore, notice be issued to him for attendance and filing of written reply. Written reply on behalf of private respondents No. 4 & 7 also not submitted. Learned counsel for private respondents No. 4 & 7 requested for adjournment for filing of written reply. Adjourned. To come up for written reply/comments on behalf of private respondents No. 3, 4 & 7 on 22.04.2019 before S.B at Camp Court D.I.Khan.



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

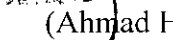
28.11.2018

Counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Minhaj Sikandar, Inspector (Legal) for official respondents No. 1 & 2 and counsel for private respondents No. 4 & 7 present. Notice was issued to private respondent No. 5 but he is reported to have been martyred as per report of City Police Officer Peshawar dated 22.11.2018 therefore, learned counsel for the appellant stated at the bar that he has no objection if the name of private respondent No. 5 Muhammad Tahir is deleted. As such, respondent No. 5 DSP Muhammad Tahir Khan is deleted from the panel of respondents. None present on behalf of remaining private respondents therefore, notice be issued to them for attendance and filing of written reply. Adjourned. To come up for written reply/comments on behalf private respondents on 22.01.2019 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan


15.03.2018

Clerk to counsel for the appellant and Mr. Ziaullah, DDA alongwith Mr. Nazir Ahmad, SI for respondent no. 1 and 2 present. Written reply on behalf of respondents no. 1 and 2 submitted. Mr. Abdullah Baloch, Advocate filed wakalat nama on behalf of private respondent no. 7. To come up for written reply/comments of remaining respondents on 28.06.2018 before S.B at camp court D.I.Khan.


(Ahmad Hassan)
Member
Camp Court D.I.Khan

28.06.2018

Tour is hereby cancelled, Therefore the case is adjourned for the same on ~~21.08~~ 2018 before S.B.


Reader
Camp Court D.I.Khan


~~01.08~~ 2018

Clerk counsel for the Appellant present. Mr. Muhammad Nazir, H-C for respondent present. Tour is hereby cancelled. Therefore the Case is adjourned for the same on 11.09.2018 before S.B.


Reader
Camp Court D.I.Khan


11.09.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Khalid Nawaz, Inspector (legal) for official respondents No. 1 & 2 present. None present on behalf of private respondents No. 3 to 18 therefore, fresh notice be issued to them for attendance and filing of written reply. Adjourned. To come up for written reply/comments on behalf of private respondents No. 3 to 18 on 28.11.2018 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan


25.01.2018

Appellant with counsel present. Mr. Farhaj Sikandar, District Attorney for the respondents also present. Written reply on behalf of respondents not submitted. Learned District Attorney requested for adjournment. Adjourned. To come up for written reply/comments on 22.02.2018 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

22.02.2018

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith Mr. Khalid Nawaz, Inspector (legal) for official respondents No. 1 & 2 and counsel for private respondents No. 4 & 7 also present. None present on behalf of private respondents No. 3, 5, 6 and 8 to 18 therefore, notice be issued to them for attendance and filing of written reply/comments. Adjourned. To come up for written reply/comments on 15.03.2018 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

26.10.2017

Counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney for the respondents present. Counsel for the appellant argued that the appellant has challenged the seniority list of Deputy Superintendent of Police Khyber Pakhtunkhwa dated 06.02.2017 wherein the appellant has been placed at serial No. 103 however the appellant ought to have been placed at serial No. 87.

Appellant Deposited
Security & Process Fee

Points raised need consideration. Admitted for regular hearing, subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days, notices be issued to the respondent party for written reply/comments for 25.01.2018 before S:B at Camp Court D.I.Khan.






Muhammad Hamid Mughal

Member
Camp Court D.I.Khan.

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 688/2017

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	30/06/2017	<p>The appeal of Syed Inayat Ali Shah presented today by Mr. Muhammad Ismail Alizai Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	10-7-17	<p>This case is entrusted to Touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>23-08-2017</u></p> <p style="text-align: right;"> CHAIRMAN</p>
23.08.2017		<p>Counsel for the appellant present and requested for adjournment. Adjourned. To come up for preliminary hearing on 26.10.2017 before S.B at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court D.I. Khan</p>

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
Service Appeal No. 688 /2017.

Syed Inayat Ali Shah, DSP.

Appellant.

Versus

Provincial Police Officer, KPK and others.

Respondents.

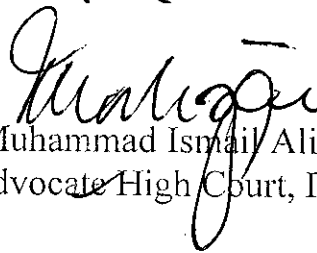
Service Appeal

I N D E X

<u>S.No.</u>	<u>Description of Documents</u>	<u>Annexure</u>	<u>Page(s).</u>
1.	Petition with Grounds of Appeal & affidavit.	--	02 — 05
2.	Copies of Orders / notifications.	A & B	06 — 10
3.	Copy of Impugned List-2017.	C	11 — 17
4.	Copies of Representation/office Memos.	D	18 — 20
5.	Vakalat-Nama	--	— 21

Dated: 24.6.2017.


(Syed Inayat Ali Shah) Appellant
Through Counsel


(Muhammad Ismail Alizai)
Advocate High Court, DIKhan.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
Service Appeal No. 688 /2017.

Khyber Pakhtukhwa
Service Tribunal

Diary No. 737

Dated 30-6-2017

Syed Inayat Ali Shah,
Deputy Superintendent of Police,
Presently, Asstt; Director, SIW(South), Anti-corruption Establishment,
Office of Director, ACE, Khyber Pakhtunkhwa, Peshawar.
(Appellant)

Versus

1. The Provincial Police Officer (IGP), Khyber Pakhtun-khwa, Central Police Office, Peshawar
2. Additional Inspector General of Police, Establishment, Khyber-Pakhtunkhwa, CPO, Peshawar,
3. - DSP Nazir Khan, through PPO, Khyber Pakhtunkhwa, Peshawar.
4. - DSP Abdul Hye, through PPO, Khyber Pakhtunkhwa, Peshawar.
5. - DSP Muhammad Tahir-Khan, through PPO, Khyber Pakhtunkhwa, Peshawar.
6. - DSP Saleem Amanullah, through PPO, Khyber Pakhtunkhwa, Peshawar.
7. - DSP Zia Hassan, through PPO, Khyber Pakhtunkhwa, Peshawar.
8. DSP Khalid Khan, through PPO, Khyber Pakhtunkhwa, Peshawar.
9. DSP Muhammad Ashraf, through PPO, Khyber Pakhtunkhwa, Peshawar.
10. DSP Arbab Shafiullah, through PPO, Khyber Pakhtunkhwa, Peshawar.
11. DSP Rafiullah, through PPO, Khyber Pakhtunkhwa, Peshawar.
12. DSP Muhammad Ayub, through PPO, Khyber Pakhtunkhwa, Peshawar.
13. DSP Saddique Akbar, through PPO, Khyber Pakhtunkhwa, Peshawar.
14. DSP Amjad Ali, through PPO, Khyber Pakhtunkhwa, Peshawar.
15. DSP Tariq Karim, through PPO, Khyber Pakhtunkhwa, Peshawar.
16. DSP Muhammad Naeem, through PPO, Khyber Pakhtunkhwa, Peshawar.
17. DSP Muhammad Khalid, through PPO, Khyber Pakhtunkhwa, Peshawar.
18. DSP Fazal Maula, through PPO, Khyber Pakhtunkhwa, Peshawar.

(Respondents)

Note: All the defendants are necessary party to the lis and the addresses given above are sufficient for the purpose of service.

Filed to day

Registrar

APPEAL U/S 4 OF KPK SERVICE TRIBUNAL ACT, 1974
SEEKING ADJUSTMENT / PLACEMENT OF APPELLANT IN
SENIORITY LIST -2017 AT DUE POSITION.

Respondents
No 65e 8 to
18 are placed
Ex parte
22-1-19

Ex-Parte

Respectfully Sheweth: -

The appellatant very humbly submits as under: -

BRIEF FACTS:

1. That the appellatant got employed in the erstwhile NWFP Police Department as Assistant Sub Inspector during the year 1995. In due course the appellatant was placed in promotion list-E in 1998, earned promotion to the rank of Sub Inspector during 2002 and was confirmed in the said rank effective 16.7.2005 vide notification No. 1916 dated 20.2.2010 issued from the office of DPO, D.I.Khan and Notification No. 18414/E-II dated 30.7.2010 issued at CPO, Peshawar in consequence of judgment of NWFP (KPK) Services Tribunal dtd. 23.7.2010. Copies placed herewith at Annexes A & B, respectively.
2. That the appellatant later having been promoted as Inspector and lastly as Deputy Superintendent of Police effective 24.1.2014 is currently serving as such at Khyber Pakhtunkhwa Anti Corruption Establishment.
3. That during the year 2014 a Seniority List of Dy; Superintendents of Police was issued whereby the appellatant was wrongly placed at a serial number inconsistent with the facts and relevant records hence the same was challenged by the appellatant through a representation made to the office of respondent No.1 in due course. The issue was referred to a certain committee but till date with no results.
4. That lately a Seniority List of Dy: Superintendents of Police for the year 2017 was issued from CPO vide Notification No.91/E-1 dated 6.2.2017, depicting the name of the petitioner at serial number 103 thus causing grievance to the appellatant and therefore, impugned hereby. Copy of impugned List is placed herewith at Annexure-C.
5. That in the light of original seniority position of the appellatant as well the rules governing the reckoning of seniority, prime being the date of confirmation in the rank of Sub Inspector, the placement of the appellatant in the above said seniority list is erroneous and wrong apparently due to misreading and miscalculation of proper data / office records.
6. That for no fault on part of the appellatant and in consequence of an apparent clerical mistake the placement of the appellatant in impugned seniority list has been disturbed, reckoning the petitioner much junior to his batch-mates rather those as well inducted in the department much later than the appellatant. In consequence of fore noted situation the name of appellatant ought to be placed at serial 87 i.e below the name of Sahibzada Sajjad Ahmad, who was confirmed in the rank of Sub Inspector effective 10.6.2005, and above the name of Mr. Nazir Khan, confirmed as SI on 16.11.2005, given the fact that confirmation of the appellatant in the rank of Sub Inspector has been notified effective 16.7.2005. Pertinent to mention



here is that all the rest i.e officers placed at serial numbers 87 to 102 of the impugned List and arrayed as respondents hereby were confirmed in the rank of Sub Inspector much later than the appellant yet for apparent err are placed above the name of appellant.

- 7. The appellant thus impugned the virus of said Seniority List through a representation filed with the office of respondent No.1 seeking redressing of his grievance by rectification of the above said List and thus bringing the name of the appellant in due place / position i.e. at serial No.87, i.e. below the name of Sahibzada Sajjad Ahmad (serial No.86) and above the name of Mr. Nazir Khan (serial No.87 of impugned list) in terms of Police Rules 12.2(3) and other relevant factors / rules including the date of confirmation of the appellant in the rank of Sub Inspector i.e. 16.7.2005, yet with no response till date and expiry of the statutory period. Copy of representation is placed herewith at Annex-D.
- 8. That having no alternate remedy available, the appellant approaches this Hon`ble Tribunal, to redress his grievance as prayed for hereinafter on, inter-alia, the following grounds,

Grounds:

- 1. That the Notification / acts / omissions on part of departmental authorities / respondents, as impugned hereby, are discriminatory, arbitrary, legally and factually incorrect, Ultra-vires, Void ab-initio and militate against the principles of natural justice. The Notification impugned hereby being inconsistent with law, rules and regulations in vogue qua reckoning of the seniority of appellant is thus liable to be set-aside, nullified and rectified in the ends of justice.
- 2: That the appellant has been subjected to the discriminatory treatment for no fault on his part. Respondents have clearly defied the law, rules & instructions besides principles of natural justice as well the verdicts of this Hon`ble Tribunal on the point while determination of seniority of the appellant. The impugned notification / acts /omissions have thus caused grave miscarriage of justice to the appellant and have adversely affected the rights of appellant without any lawful excuse.
- 3. That the impugned notification / acts and omissions of respondents are devoid of any legal force and are issued to the detriment of the legitimate rights of the appellant thus are not maintainable in law and are liable to be rectified / set-aside in the interest of justice.



4. That in light of the principle of "equal treatment" as ordained by the law, judgments of this Hon'ble Tribunal pronounced in a number of service appeals besides the Constitution of the country, placement of the appellant in Seniority List-2017 ought to have been reckoned from the date of his confirmation i.e. 16.7.2005 as has been done with convenience by the respondents in case of other employees.
5. That the petition of appeal / appellant is duly supported by law and rules formulated thereunder, besides the affirmation / affidavit annexed hereto.
6. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under reference/appeal.
7. That the counsel for the appellant may very graciously be allowed to add to the grounds during the course of arguments, if need be.

Prayer:

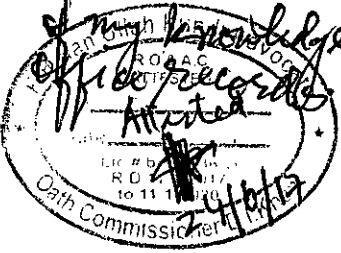
In view of the fore-given facts and grounds, it is requested that by setting-aside the impugned Notification, the acts /omissions on part of respondents in their failure to reckon the placement of the appellant above the name of respondent No.3 i.e at serial No.87 in the impugned Seniority List and to declare all consequential acts of departmental authorities as arbitrary, ultra-vires, illegal, nullity in law thus of no effect on the rights of the appellant, also to direct the respondents to desist from discriminating the appellant and to rectify all official records in consequence thereof. Any other remedy deemed appropriate by the Hon'ble Tribunal in the circumstances is solicited, too.

Humbly,

Dated: 24.6.17

Affidavit:-

Verified this 24th day of June, 2017 that contents of the Petition are true to the best of my knowledge + belief as per office records.

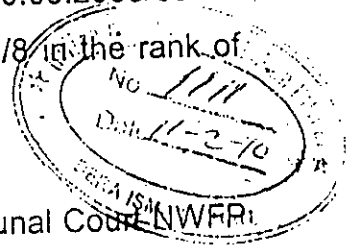


(Deponent)


(Signature)
 (Syed Inayat Ali Shah) Appellant
 Through Counsel.
(Signature)
 (Muhammad Ismail Alizai)
 Advocate High Court.

ORDER

This office order issued vide Endst: No.772/ES dated 20.03.2008 so far it relates to the confirmation of Sub Inspector Inayat Ali Amjid No.D/8 in the rank of Sub Inspector with effect from 15.11.2007 is hereby cancelled.



Consequent on the decision of Honorable Service Tribunal Court Peshawar Judgment dated 23.07.2009 Sub Inspector Inayat Ali Amjid No.D/8 of D.I.Khan District is hereby confirmed in the rank of Sub Inspector with effect from 16.07.2005 with his colleagues.


(FEROZE SHAH)
Dy: Inspector General of Police,
Dera Ismail Khan Range


No. 530 /ES Dated 09-02-2010

Copy to the District Police Officer, D.I.Khan for information and necessary action. Necessary gazette notification may please be issued accordingly. The recommendation of his name for Promotion List 'F' may also be furnished alongwith his service record for onward submission to PPO NWFP Peshawar.

(FEROZE SHAH)
Dy: Inspector General of Police,
Dera Ismail Khan Range

EC

For M/Action


D.I.Khan
11/02/10

(9) B

**FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE
GAZETTE PART-II, ORDERS BY THE PROVINCIAL POLICE
OFFICER KHYBER PAKHTUNKHWA,**

NOTIFICATION

Dated: 30 / 12 / 2010.

No. 18414 /E-II. PROMOTION AS OFFG: INSPECTOR

Confirmed Sub Inspector Syed Inayat Ali Amjad No. D/08 of DIKhan Region has been approved as per recommendation of the DPC for inclusion of his name into promotion list "F" and promotion to the rank of Offg: Inspector BPS-16 (6050-470-20150) with his colleagues.

His promotion will take effect from the date, he actually take over charge of his higher responsibilities.

Necessary Gazette Notification may be issued accordingly.

On promotion as Inspector he will remain posted to DIKhan Region.


(ABDUL MAJEED KHAN MARWAT)
PSP

Addl. IGP/Headquarters,
For Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar.

No. 18415-12 /E-II

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

1. Deputy Inspector General of Police DIKhan Region
2. Office Supdt: Secret CPO with a spare copy for placing in his original Character Roll.
3. U.O.P. File

(8)

B/1

**FOR PUBLICATION IN THE KHYBER
PAKHTUNKHWA POLICE GAZETTE PART-II,
ORDERS BY THE PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA PESHAWAR.**

NOTIFICATION

Dated: 23/12/2011

No. 26570 /E-II, **CONFIRMATION AS INSPECTOR:-** The following
Offg: Inspectors on list "F" of Khyber Pakhtunkhwa Police are hereby
confirmed as Inspectors with immediate effect.

S/NO	NAME & NO	S/NO	NAME & NO
1.	Khalid Khan No. H/59	15.	Sanobar Khan No. M/11
2.	Adnan Orakzai No. P/04	16.	Bahadar Khan No. P/20
3.	Waris Khan No. P/10	17.	Syed Inayat Ali Amjad No. D/08
4.	Abdus Salam Khalid No. P/15	18.	Niaz Gul No. H/40
5.	Shafiullah No. P/17	19.	Muhammad Islam No. H/84
6.	Rafiullah No. P/29	20.	Zahid ur Rehman No. H/76
7.	Muhammad Ayub No. M/112	21.	Muhammad Jan No. D/07
8.	Muhammad Gul No. M/54	22.	Noor Zamin Shah No. P/91
9.	Bahramand No. M/109	23.	Khan Khel No. Mr/57
10.	Saddique Akbar No. M/118	24.	Muhammad Aleem Jan No. P/66
11.	Tariq Karim No. M/174	25.	Hameed Ullah No. MR/03
12.	Muhammad Naeem No. M/02	26.	Taj Malook No. MR/51
13.	Khan Bahadar No. M/103	27.	Muhammad Kamal No. P/37
14.	Muhammad Khalid No. M/168	28.	Zarwali No. P/49

(KHALID MASOOD)
Addl. IGP/Headquarters,
For Provincial Police Officer,
Khyber Pakhtunkhwa
Peshawar

No. 26571-92 /E-II

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

1. Addl: IGP/Investigation Khyber Pakhtunkhwa Peshawar with a spare copy for publication in Khyber Pakhtunkhwa Gazette Part-II.
2. Addl: IGP/Special Branch Khyber Pakhtunkhwa Peshawar.
3. Capital City Police Officer, Peshawar.
4. Commandant PTC Hangu.
5. Commandant Elite Force Khyber Pakhtunkhwa Peshawar.
6. All RPOs in Khyber Pakhtunkhwa.
7. Director ACE Khyber Pakhtunkhwa Peshawar
8. Office Supdt: Secret CPO Peshawar.
9. U.O.P file.

(19)

8/12

**OFFICE OF THE
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA, PESHAWAR.**

Dated Peshawar, the 24/01 2014.

NOTIFICATION

No. S/ 418 /14. In pursuance of the provisions contained in Section-5 of the Khyber Pakhtunkhwa (Promotion of Superintendent of Police and Deputy Superintendent of Police) Rules-2007, the Competent Authority i.e Provincial Police Officer on recommendations of the Departmental Selection Committee meeting held on 30.12.2013 is pleased to promote the following Inspectors (BS-16) to the rank of Deputy Superintendent of Police (BS-17) on regular basis with immediate effect.

2. The officers on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

Their promotion will take effect from the date they actually assume the charge of higher responsibility:-

S. No.	Name and No.
1.	Inspector Muhammad Ayub, M/112
2.	Inspector Wali-ud-Din, M/186
3.	Inspector Baharamand, M/109
4.	Inspector Saddique Akbar, M/118
5.	Inspector Bakht Raj, M/174
6.	Inspector Amjad Ali, M/147
7.	Inspector Tariq Karim, M/174
8.	Inspector Muhammad Naeem, M/02
9.	Inspector Muhammad Alam, M/73
10.	Inspector Muhammad Khalid, M/168
11.	Inspector Gul Noor, M/122
12.	Inspector Fazal Maula, P/90
13.	Inspector Bahadar Khan, P/20
14.	Inspector Syed Inayat Ali Amjad, D/08
15.	Inspector Niaz Gul, H/40
16.	Inspector Muhammad Ishtiaq, H/82
17.	Inspector Muhammad Islam, H/84
18.	Inspector Syed Mukhtar Shah, H/80
19.	Inspector Muhammad Tahir Shah, B/03
20.	Inspector Nisar Muhammad, B/15
21.	Inspector Muhammad Jan, D/07
22.	Inspector Noor Zamin Shah, P/91
23.	Inspector Khan Khel, MR/57
24.	Inspector Muhammad Aleem Jan, P/66
25.	Inspector Tajamul Khan, MR/21
26.	Inspector Hameedullah, MR/03
27.	Inspector Taj Malook, MR/51
28.	Inspector Muhammad Kamal, P/37

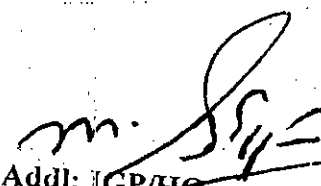
Sd/-
NASIR KHAN DURRANI
Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

No. S/ 419-47 /14, dated Peshawar, the 24/01 /2014.

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

1. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Govt. Khyber Pakhtunkhwa, E & AD Deptt: Peshawar.
5. Secretary Govt. Khyber Pakhtunkhwa, Finance Deptt: Peshawar.

6. Secretary Govt: Khyber Pakhtunkhwa, Home & T.As Deptt: Peshawar.
7. Accountant General, Khyber Pakhtunkhwa, Peshawar.
8. Addl: IGP/HQrs., Khyber Pakhtunkhwa, Peshawar.
9. Addl: IGP/Operations, Khyber Pakhtunkhwa, Peshawar.
10. Addl: IGP/Special Branch, Khyber Pakhtunkhwa, Peshawar.
11. Addl: IGP/Investigation, Khyber Pakhtunkhwa, Peshawar.
12. Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
13. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
14. Commandant, PTC, Hangu.
15. Director General, FIA, Islamabad.
16. Capital City Police Officer, Peshawar.
17. All Region D.Is.G. of Police in Khyber Pakhtunkhwa.
18. A.Is.G. of Police, Traffic & Telecommunication, Khyber Pakhtunkhwa.
19. Director, FIA, Peshawar Zone, Peshawar.
20. Officer concerned.
21. Registrar, CPO, Peshawar.
22. Supdt: "E" Branch. CPO.
23. Manager Govt: Printing Press, KPK, Peshawar.
24. U.O.P. Files.
25. Office Copy.


Addl: IGP/HQrs:
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

SENIORITY LIST OF DSSP BS-17 OF KHYBER PAKHTUNKHWA POLICE

No. 91 /SE-I. The Seniority List of DSSP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned.

06 February, 2017

S. No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Qual.	D.O. Promotion as DSP	Promotion of Notification	Remarks
1.	Mr. Muhammad Nawaz	08.05.1959	07-05-2019	Charsadda	BA/LLB	10.12.2009	Notification No S/1281/2010 dt: 23.02.2010	
2.	Mr. Rahim Shah	22.02.1962	21.02.2022	Swat	BA	10.12.2009	Notification No S /882/2010 dt: 04.02.2010	
3.	Mr. Khushdil Khan	20.11.1959	19-11-2019	Nowshera	BA	10.12.2009	Notification No S /6580/2009 dt: 10.12.2009	
4.	Mr. Bakhtiar Ahmed	04.04.1957	03-04-2017	Abbottabad	BA	11.05.2010	Notification No S /2481/2010 dt: 11.05.2010	
5.	Mr. Imtiaz Ali	05.06.1960	04-06-2020	Nowshera	BA	11.05.2010	Notification No S /2481/2010 dt: 11.05.2010	
6.	Mr. Shahid Ahmed	01.01.1961	31-12-2021	Mardan	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
7.	Mr. Nowsher Khan	14.05.1961	13-05-2021	Peshawar	MA	11.05.2010	Notification No S /2481/2010 dt: 11.05.2010	
8.	Mr. Sajjad Ali	05.05.1958	04-05-2018	Peshawar	FA	13.06.2011	Notification No S /3435/2011 dt: 13.06.2011	
9.	Mr. Tariq Sohail	15.04.1963	14-04-2023	Peshawar	BA	13.06.2011	Notification No S /3435/2011 dt: 13.06.2011	
10.	Mr. Jehanzeb Khan Burki	15.07.1963	14-07-2023	Peshawar	MA/LLB	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
11.	Mr. Khan Akbar	01.01.1965	30-12-2025	Peshawar	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
12.	Mr. Shah Jehan Durani	03.01.1965	02-01-2025	Charsadda	BA	13.06.2011	Notification No S /3435/2011 dt: 13.06.2011	
13.	Mian Muhammad Riaz	10.02.1958	09-02-2018	Charsadda	MA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
14.	Mr. Javaid Khan	15.11.1960	14-11-2020	Peshawar	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
15.	Mr. Fazal Ahmed Jan	02.04.1962	01-04-2022	Peshawar	MA/LLB	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
16.	Mr. Saleem Riaz	25.06.1965	24-06-2025	Peshawar	MA	20.01.2011	Notification No S /733/2011 dt: 03.02.2011	
17.	Mr. Sarfaraz Ali Shah	29.08.1960	28-08-2020	Peshawar	MA	20.01.2011	Notification No S /733/2011 dt: 03.02.2011	
18.	Mr. Waseem Ahmed Khalil	22.04.1962	21-04-2022	Peshawar	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
19.	Mr. Muhammad Ashfaq	01.04.1971	30-04-2031	Charsadda	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
20.	Mr. Lal Farid	15.11.1957	14-11-2017	Karak	FA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
21.	Mr. Zain Khan	01.04.1960	30-03-2020	Mardan	MA/LLB	20.01.2011	Notification No S/733/2011 dt: 03.02.2011	
22.	Shahzada Kokab Farooq	13.12.1969	12-12-2029	DIKhan	M.A	20.01.2011	Notification No S /733/2011 dt: 03.02.2011	
23.	Mr. Baz Mir	01.10.1957	01-10-2017	Kohistan	10 th	20.01.2011	Notification No S /733/2011 dt: 03.02.2011	
24.	Mr. Arif Javed	08.02.1964	07-02-2024	Haripur	BA	20.01.2011	Notification No S /733/2011 dt: 03.02.2011	
25.	Mr. Aman Ullah	09.07.1964	08-07-2024	Bannu	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	

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S. No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Qual.	D.O. Promotion as DSP	Promotion of Notification	Remarks
2	Mr. Tariq Mehmood	28.04.1965	27-04-2025	Abbottabad	BA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
2	Mr. Ijaz Ahmed	15.06.1966	14-06-2026	Abbottabad	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
2	Mr. Janas Khan	10.02.1965	09-02-2025	Haripur	BA	20.01.2011	Notification No S/733/2011 dt: 03.02.2011	
2	Mr. Mukhtiar Ahmad	04.02.1969	03-02-2029	Abbottabad	FA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
3	Mr. Muhammad Suleman	28.07.1970	27-07-2030	Abbottabad	MA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
3	Mr. Saeed Ahmed	06.04.1966	05-04-2026	Abbottabad	FA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
3	Mr. Asif Gohar	07.08.1964	06-08-2024	Manshra	10 th	20.01.2011	Notification No S/733/2011 dt: 03.02.2011	
3	Mr. Hafeez Ur Rehman	01.07.1957	30-05-2017	Abbottabad	10 th	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
3	Mr. Aamir Shahzad	09.08.1968	08-08-2028	Peshawar	MA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
3	Mr. Amir Muhammad	07.01.1970	01-01-2030	Buner	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
3	Mr. Jehanzeb Khan	21.02.1959	20-02-2019	Dir	BA/LLB	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
3	Mr. Idrees	18.12.1957	17-12-2017	Peshawar	10 th	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
3	Mr. Nisar Ahmad	25.03.1960	24-03-2020	Mardan	BA/LLB	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
39	Mr. Hameedullah	01.05.1957	30.04-2017	DIKhan	9 th	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	Appointed as Constable on 06.11.1975
40	Mr. Gul Naseeb	09.11.1968	08-11-2028	Bannu	FSc	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
41	Mr. Waqar Ahmad	03.01.1968	02-01-2028	Nowshera	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
42	Mr. Muhammad Shafiq	13.01.1963	12-01-2023	Bannu	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
43	Mr. Muhammad Arif	10.03.1969	09-03-2029	Peshawar	MA/LLB	19.03.2012	Notification No S/6949/2012 dt: 25.09.2012	
44	Mr. Rafiullah	19.04.1960	18-04-2020	Kohat	10 th	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
45	Mr. Tahir ur Rahman	28.02.1969	27-02-2029	Haripur	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
46	Mr. Abdul Ghafoor	24.05.1957	23-05-2017	DIKhan	FA	31.03.2012	Notification No S/2382/2012 dt: 31.03.2012	
47	Mr. Darvaish Ali	14.06.1962	13-06-2022	Mardan	MA/LLB	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
48	Mr. Tauheed Khan	20.10.1963	19-10-2023	DIKhan	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
49	Mr. Salah-ud-Din	15.01.1970	14-12-2030	Tank	MA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
50	Mr. Gul Nawaz	02.12.1959	01-12-2019	Swabi	MA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
51	Mr. Noor Jamal	10.01.1966	09-01-2026	Mardan	MA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
52	Mr. Muhammad Arif	22.04.1964	21-04-2024	Bannu	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
53	Mr. Tariq Habib	05.09.1968	04-09-2028	Peshawar	MA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
54	Mr. Nisar Ahmad	02.11.1973	01-11-2033	Charsadda	BA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
55	Mr. Aslam Nawaz	01.03.1972	28-02-2032	Bannu	MA/LLB	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
56	Mr. Tariq Iqbal	13.04.1974	12-04-2034	Peshawar	MSc/LLB	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
57	Mr. Sanaullah	10.01.1969	09-01-2029	Lakki	BA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
58	Mr. Mubarak Khan	04.03.1957	03-03-2017	Swat	FA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
59	Mr. Riaz Ahmad	01.01.1960	31-12-2020	MKD	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
60	Mr. Bakht Zada	15.02.1962	14-02-2022	Buner	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
61	Mr. Quaid Kamal	01.01.1963	31-12-2023	Charsadda	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
62	Mr. Banaras Khan	05.01.1962	04.01.2022	Nowshera	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
63	Mr. Shafiullah	01.04.1971	31-03-2031	DIKhan	MA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	

SE-1
Najeeb

S. No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Qual	D.O. Promotion as DSP	Promotion of Notification	Remarks
62	Mr. Munir Hussain	30.05.1966	29-05-2026	Manshra	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
63	Mr. Qamar Hayat	08.04.1971	07-04-2031	Haripur	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
64	Mr. Zulfiqar Khan Jadoon	15.06.1963	14-06-2023	Abbottabad	FA	25.03.2013	Notification No. S/1791/2013 dt: 25.03.2013	
65	Mr. Nazir Ahmad	02.02.1970	01-02-2030	Abbottabad	MA/B.Ed	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
68	Mr. Saeed Akhtar	02.02.1971	01-02-2031	Abbottabad	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
69	Mr. Muhammad Ayaz	03.03.1975	02-03-2035	Abbottabad	BSc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
70	Muhammad Jamil Akhtar	22.02.1977	21-02-2037	Haripur	B.Sc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
71	Mr. Muhammad Azeem	06.01.1958	05-01-2018	Abbottabad	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
72	Mr. Khurshed Ahmad	05.07.1958	04-07-2018	Manshra	BA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
73	Mr. Abdul Aziz	04.06.1957	03-06-2017	Abbottabad	FA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
74	Mr. Falak Niaz	01.04.1965	31-03-2025	Swabi	MA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
75	Mr. Ishiaq Ahmad	01.11.1971	30-10-2031	Lakki	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
76	Mr. Shaukat Ali	05.03.1971	04-03-2031	Swabi	BSc	16.10.2012	Notification No. S/8772/2012 dt: 16.10.12	
77	Mr. Abdul Samad	14.04.1969	13.04.2029	Swabi	MA	16.10.2012	Notification No. S/8772/2012 dt: 16.10.12	
78	Mr. Mushtaq Ahmad	15.03.1970	14-03-2030	Swabi	MA	25.03.2013	Notification No. S/8772/2012 dt: 25.03.2013	
79	Mr. Sajjad Ahmad	01.04.1968	31-03-2028	Swabi	MA	25.03.2013	Notification No. S/8772/2012 dt: 25.03.2013	
80	Mr. Tahir Iqbal	20.01.1969	19-01-2029	Haripur	B.Sc	25.03.2013	Notification No. S/8772/2012 dt: 25.03.2013	
81	Mr. Muhammad Saddique	20.02.1957	19-02-2017	Manshra	10 th	25.03.2013	Notification No. S/8772/2012 dt: 25.03.2013	
82	Mr. Abdur Rashid Marwat	30.03.1963	29-03-2023	Lakki	10 th	25.03.2013	Notification No. S/8772/2012 dt: 25.03.2013	
83	Mr. Muzamil Shah	08.03.1972	07-03-2032	Swabi	M.A	25.03.2013	Notification No. S/8772/2012 dt: 25.03.2013	
84	Mr. Niaz Muhammad	11.02.1971	10-02-2031	Swabi	MA/LLB	25.03.2013	Notification No. S/8772/2012 dt: 25.03.2013	
85	Mr. Shah Hassan	01.05.1968	30-04-2028	Mardan	MA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
86	Sahibzada Sajjad Ahmad	02.02.1971	01-02-2031	Swabi	BA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
87	Mr. Nazir Khan	18.10.1970	17-10-2030	Mardan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
88	Mr. Abdul Hai	01.08.1972	31-07-2032	D.I.Khan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
89	Mr. Muhammad Tahir	04.12.1968	03-12-2028	N.W.Agency	MA/B.ED	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
90	Mr. Saleem Aman Ullah	23.03.1970	22-03-2030	Peshawar	FA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
91	Mr. Zia Hassan	01.11.1974	31-10-2034	DIKhan	M.A/ Pol	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
92	Mr. Khalid Khan	28.02.1958	27-02-2018	Abbottabad	F.Sc	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
93	Mr. Muhammad Ashraf	20.04.1960	19-04-2020	Bannu	10 th	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
94	Arbab Shafiullah	09.10.1966	08-10-2026	Peshawar	FA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
95	Mr. Rafiullah	12.03.1968	11-03-2028	Peshawar	FA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
96	Mr. Muhammad Ayub	13.10.1957	12-10-2017	Swat	FA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
97	Mr. Saddique Akbar	28.05.1958	27-05-2018	MKD	BA/LLB	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
98	Mr. Amjad Ali	18.03.1963	17-03-2023	Swat	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
99	Mr. Tariq Karim	05.05.1958	04-05-2018	Chitral	10 th	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
100	Mr. Muhammad Naeem	10.10.1960	09-10-2020	MKD	10 th	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
101	Mr. Muhammad Khalid	01.01.1970	31-12-2029	Chitral	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
102	Mr. Fazal Mula	03.02.1960	02-02-2020	Peshawar	FA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	

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S. No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Qual	D.O. Promotion as DSP	Promotion of Notification	Remarks
03	Syed Inayat Ali Shah	10.01.1972	09-01-2032	D.I.Khan	MA	24.01.2014	Notification No. S/118/14, dt: 24.01.2014	
04	Mr. Niaz Gul	07.03.1971	06-03-2031	Abbottabad	BSc	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
05	Mr. Muhammad Ishtiaq	04.05.1973	03-05-2033	Manshra	BSc	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
06	Mr. Muhammad Islam	01.04.1959	31-03-2019	Mardan	10 th	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
07	Syed Mckhtar Shah	18.10.1967	17-10-2027	Haripur	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
08	Muhammad Tahir Shah	01.03.1972	28-03-2032	Bannu	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
09	Mr. Nisar Muhammad	20.01.1973	19-01-2033	Lakki	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
10	Mr. Noor Zamin Shah	30.01.1962	29-01-2022	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
11	Mr. Khan Khel	10.04.1969	09-04-2029	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
12	Muhammad Aleem Jan	11.04.1967	10-04-2027	Charsadda	BSc	24.01.2014	Notification No. S/118/14, dt: 24.01.2014	
13	Mr. Tajammul Khan	30.09.1965	29.09.2025	Swabi	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
14	Mr. Hameedullah	25.04.1974	24-04-2034	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
15	Mr. Taj Malook	10.04.1961	09-04-2021	Swabi	FA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
16	Mr. Kamal Khan	03.03.1957	02-03-2017	Charsadda	10 th	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
17	Muhammad Attiq Shah	01.09.1978	30-08-2038	Charsadda	FA	06.02.2014	Notification No. S/677/14 dt: 06.02.2014.	
18	Mr. Zar Wali	20.01.1961	19-01-2021	Peshawar	FA	06.02.2014	Notification No. S/677/14 dt: 06.02.2014.	
19	Mr. Ijaz Ahmad	05.04.1963	04.04.2023	Manshra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
20	Mr. Arshad Mehmood	15.08.1964	14.08.2024	Manshra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
21	Mr. Noor Muhammad	14.10.1957	13.10.2017	Karak	10th	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
22	Mr. Hussain Badshah	11.05.1959	10.05.2019	Karak	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
23	Mr. Shakeel Ahmad	14.04.1969	13.04.2029	Charsadda	BSc	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
24	Mr. Muhammad Saeed	04.05.1969	03.05.2029	Mardan	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
25	Mr. Khabir Muhammad	01.01.1972	31.12.2031	Abbottabad	MA/LLB	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
26	Mrs. Nazia Naurcen	01.12.1970	30.11.2030	Abbottabad	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
27	Mrs. Shahzadi Noshad	10.04.1972	09.04.2032	Hangu	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
28	Mr. Raheem Hussain	11.05.1970	10.05.2030	Shangla	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
29	Mr. Amjad Hussain	24.03.1971	23.03.2031	Manshra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
30	Mr. Rizwan Habib	19.04.1974	18.04.2034	Manshra	B.A	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
31	Mr. Alamzeb	08.07.1957	07.07.2017	Haripur	10 th	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
32	Mr. Jehangir	10.11.1965	09.11.2025	Abbottabad	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
33	Mr. Shamraiz Khan	10.02.1960	09.02.2020	Abbottabad	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
34	Mr. Muhammad Riaz	01.04.1959	31.03.2019	Abbottabad	10 th	24.10.2014	Notification No S /6580/2009 dt: 10.12.2009	
35	Mr. Rahmat Ullah	05.03.1971	04.03.2031	Nowshera	FA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
36	Mr. Muhammad Baran	03.04.1961	02.04.2021	D.I.Khan	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
37	Mr. Alamzeb	12.02.1980	11.02.2040	Mardan	F.Sc	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
38	Mr. Sher Zada	17.03.1958	16.03.2018	Swat	FA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
39	Mr. Zahir Shah	01.04.1962	31.03.2022	Buner	FA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
40	Mr. Zafar Khan	10.01.1963	09.01.2023	Buner	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
41	Mr. Asad Mehmood	08.03.1968	07.03.2028	Loralai	BA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	

Syed Inayat

S. No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Qualification	D.O. Promotion as DSP	Promotion of Notification	Remarks
142.	Mr. Fazal Raziq	06.07.1957	05.07.2017	Swabi	10 th	24.10.2014	Notification No. S3528/14 dt: 24.10.2014	
143.	Mr. Muhammad Yousaf	04.02.1958	03.02.2018	Manshra	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
144.	Mr. Muzakir Shah	01.06.1961	31.05.2021	Charsadda	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
145.	Mr. Muhammad Rahim	08.01.1959	07.01.2019	Karak	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
146.	Mr. Muhammad Aslam	08.04.1962	07.04.2022	Karak	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
147.	Mr. Safdar Khan	30.04.1971	29.04.2031	Kohat	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
148.	Mr. Murad Ali	09.01.1973	08.01.2033	Bannu	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
149.	Mr. Mujeeb Ur Rehman	02.04.1969	01.04.2029	Bannu	BSc/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
150.	Ms. Aneela Naz	09.10.1971	08.10.2031	Peshawar	M.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
151.	Ms. Asmat Ara	15.04.1975	14.04.2035	Swabi	MA/B.Ed	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
152.	Ms. Shahzia Shahid	30.04.1974	29.04.2034	Charsadda	MA/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
153.	Ms. Rozia Altaf	30.07.1969	29.07.2029	Peshawar	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
154.	Ms. Hamida Bano	04.12.1970	03.12.2030	Peshawar	BA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
155.	Mr. Mustafa Kamal Pasha	01.09.1979	31.08.2039	Bannu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
156.	Mr. Azmat Ali Khan	06.01.1970	05.01.2030	Bannu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
157.	Mr. Waqar Ahmad	12.04.1974	11.04.2034	Charsadda	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
158.	Mr. Sajjad Hussain	23.03.1976	22.03.2036	Nowshera	B.Sc/Hon	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
159.	Mr. Yasir Aman	11.08.1970	10.08.2030	Peshawar	D.Com	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
160.	Mr. Muhammad Maroof	05.10.1974	04.10.2034	Abbottabad	B.Sc	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
161.	Mr. Abdul Hameed	22.03.1959	21.03.2019	Abbottabad	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
162.	Mr. Hakam Khan	16.06.1958	15.06.2018	Manshra	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
163.	Mr. Usman Ghani	09.07.1960	08.07.2020	Peshawar	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
164.	Mr. Ali Gohar	23.03.1968	22.03.2028	K. Agency	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
165.	Muhammad Javed	03.06.1963	14.03.2025	Manshra	10 th	28.10.2015	Notification No. 4029/SE-I dt: 27.10.2015	
166.	Muhammad Ilyas	25.12.1973	24.11.2033	Mardan	FA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
167.	Mr. Shabir Hussain Shah	15.06.1972	14.06.2032	Lakki	MA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
168.	Mr. Sona Khan	12.10.1961	11.10.2021	Lakki	10th	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
169.	Mr. Aqiq Hussain	01.04.1965	30.04.2025	Kohat	BA/LLB	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
170.	Mr. Shoukat Ali Shah	09.10.1960	08.10.2020	Kohat	10th	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
171.	Mr. Khalid Usman	06.01.1967	05.01.2027	Karak	FA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
172.	Mr. Ifrikhar Shah	30.04.1966	29.04.2026	Mardan	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
173.	Mr. Abdul Salam Khalid	24.06.1976	23.06.2036	Lakki	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
174.	Mr. Rashid Iqbal	15.1.1974	14.01.2034	Mardan	MSc	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
175.	Pir Mohsin Shah	01.01.1960	31.12.2020	DIK	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
176.	Mr. Rokhan Zeb	07.04.1965	06.04.2025	Swabi	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
177.	Mr. Jehanzada	01.04.1963	31.03.2023	Charsadda	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
178.	Mr. Muhammad Rauf	04.04.1963	03.04.2023	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
179.	Mr. Hidayat Ullah Shah	20.04.1965	19.04.2025	Swabi	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
180.	Mr. Muhammad Ismail	12.06.1966	11.06.2026	Lakki	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	

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Sr No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
81.	Mr. Gharib Nawaz	06.09.1961	05.09.2021	Karak	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
82.	Mr. Falak Nawaz	03.02.1969	02.02.2029	Kohat	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
83.	Mr. Afsar Khan	30.01.1961	29.01.2021	Karak	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
84.	Mr. Riaz Ali	01.12.1959	30.11.2019	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
85.	Muhammad Sattar Khan	04.04.1964	03.04.2024	Chitral	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
86.	Mr. Noor Habib Gul	01.02.1960	31.01.2020	Buner	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
87.	Mr. Muhammad Zaman	01.01.1965	31.12.2025	Shangla	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
88.	Mr. Hayat Ullah	04.08.1965	03.08.2025	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
89.	Mr. Muhammad Fayaz	07.03.1974	06.03.2034	Mardan	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
90.	Mr. Zahid-ur-Rehman	25.03.1970	24.03.2030	Haripur	MSc	25.03.2016	Notification No. 373/SE-I dt: 08.04.2016	
91.	Mr. Naseer Ali	03.10.1975	02.10.2035	Charsadda	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
92.	Mr. Amir Hussain	25.05.1965	24.05.2025	Swabi	FA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
93.	Mr. Gran Ullah	15.06.1963	14.06.2023	Charsadda	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
94.	Mr. Fazal Wahid	12.01.1971	11.01.2031	Malakand	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
95.	Mr. Gohar Ali	15.11.1974	14.11.2034	Peshawar	BSc	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
96.	Mr. Riaz Khan	03.02.1975	02.02.2035	Peshawar	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
97.	Mr. Izhar Shah	06.03.1966	05.03.2026	Mardan	FA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
98.	Mr. Habib Ur Rehman	04.03.1966	03.03.2026	Manshra	FA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
99.	Mr. Aurang Zeb	05.01.1970	04.01.2030	Manshra	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
200.	Mr. Altaf	04.04.1961	03.04.2021	Manshra	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
201.	Mr. Shah Nawaz	08.08.1965	07.08.2025	Manshra	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
202.	Mr. Ghulam Mustafa	02.01.1960	01.01.2020	Abbottabad	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
203.	Mr. Hazrat Nabi	17.09.1959	16.09.2019	Swabi	9th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
204.	Mr. Muhammad Altaf	12.03.1969	11.03.2029	Haripur	FA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
205.	Mr. Amjid Ali	24.04.1969	23.04.2029	Swabi	BA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
206.	Mr. Sher Rehman	05.04.1964	04.04.2024	Mardan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
207.	Mr. Khalid Mehmood	21.05.1961	20.05.2021	Abbottabad	B.A	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
208.	Mr. Bashir Khan	10.01.1958	09.01.2018	Dir Lower	FA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
209.	Mr. Riaz Muhammad	10.12.1962	09.12.2022	Mkd.Swabi	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
210.	Mr. Ifukhar Ali Shah	11.05.1976	10.05.2036	Bannu	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
211.	Mr. Murad Ali	13.04.1965	12.04.2025	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
212.	Mr. Ziarat Gul	05.10.1960	04.10.2020	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
213.	Mr. Naseer Khan	01.04.1962	31.03.2022	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
214.	Mr. Arab Nawaz	11.02.1969	10.02.2029	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
215.	Mr. Inayatullah	11.04.1962	10.04.2022	Peshawar	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
216.	Mr. Muhammad Yaseen	30.03.1975	29.03.2035	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
217.	Mr. Muhammad Zaman	18.02.1960	17.02.2020	Mardan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
218.	Mr. Zahoor-Ud- Din Khan	05.05.1963	04.05.2023	D.I.Khan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
219.	Mr. Raza Khan	01.01.1960	31.12.2019	D.I.Khan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	

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S. No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Qual.	D.O. Promotion as DSP	Promotion of Notification	Remarks
220.	Mr. Swab Gul	12.04.1961	11.04.2021	Mardan	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
221.	Mr. Muhammad Ijaz Khan	01.09.1977	31.08.2037	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
222.	Mr. Sajjad Haider	20.04.1970	19.04.2030	Abbottabad	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
223.	Mr. Ibrar Khan	20.05.1970	19.05.2030	Abbottabad	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	

(SYED AKHTAR ALI SHAH)PSP
 Addl: IGP HQrs:
 For Inspector General of Police,
 Khyber Pakhtunkhwa,
 Peshawar

Endst: No. & date even.

Copy to all concerned

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DIRECTORATE OF
ANTI-CORRUPTION ESTABLISHMENT
KHYBER PAKHTUNKHWA
PESHAWAR

No. 10/PA Dated 03/03/2017.

To

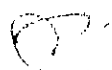
The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

Subject:-

**REPRESENTATION FOR ISSUANCE OF CORRIGENDUM IN THE
SENIORITY LIST OF DEPUTY SUPERINTENDENT OF POLICE.**

Kindly find enclosed a representation preferred by Syed Inayat Ali Shah, DSP, presently posted in this Establishment, requesting for issuance of corrigendum in the Seniority List of DSSP issued vide Notification No. 91/E-I, dated 6.2.2017, for favourable consideration please.

Encls: (As above).



Director,
Anti-Corruption Establishment,
Khyber Pakhtunkhwa,
Peshawar. *fa*

Te

VAKALATNAMA

N.W.F.P. BAR COUNCIL

MUHAMMAD ISMAIL ALIZAI
Advocate High Court
N.I.C. 12101-095025-3
S.No 1228



Issued by Authority

Father's Name: MUHAMMAD ISRAHIM KHAN ALIZAI
 Address: ALIZAI HOJSE KIKI ALIZAI, D.I. KHAN
 Office Tel: 0344840133, 0333965773
 Enrollment Dt. A.C. 1984(R 31-03-2001)
 Enrollment Dt. H.C. 25-03-2003
 Place of Practice: DERA ISMAIL KHAN
 Date of Birth: 12-04-1968
 Blood Group: B-ve

1st Floor G-Block, Khyber Road Peshawar Ph. 91-021172
 Email: muhammad.ismail.alizai@peshawarbarcouncil.com

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

In Service Appeal Titled "Syed Amjad Ali Shah VS PPO, KPK etc."

I, Syed Amjad Ali Shah, Appellant,

hereby appoint, Mr. Muhammad Ismail Alizai, Advocate High Court,

Farmanullah Kundi, Ahmad Shahbaz Alizai, Advocates High Court, D.I.Khan, in the above mentioned matter / case and authorize him/ them to do all or any of the following acts, in my/our name and on my/our behalf, that is to say,

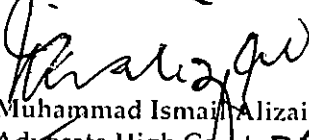
1. To appear, act and plead for me/us in the above mentioned case in this Court/ tribunal in which the same may be tried or heard or any other proceedings what so ever, ancillary thereto, including appeal, revision etc; on payment of fees separately for each court by me / us,
2. To sign, verify, file, present or withdraw all/any proceedings, petitions, appeals, cross objections and application for compromise or withdrawal, or for submission to arbitration of the said case or any other documents, as may be deemed necessary or advisable by him/ them and to conduct prosecution or defense of the said case at all its stages,
3. To undertake execution proceedings, deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be conferred to be done for the progress and in the course of prosecution of the said case,
4. To appoint and instruct any other Advocate/ legal practitioner authorizing him to exercise the power and authority conferred upon the advocate whenever he/they may think fit to do so and to sign Power of Attorney on our behalf,

I /we, the undersigned do hereby agree to ratify and confirm all acts done by the advocate or his authorized substitute in the matter as my /our own acts, as if done by me/us to intents and purposes, and I / we undertake that I /we or my/our duly authorized agent shall appear in the court on all hearings and will inform the advocate(s) for appearance when case is called and I/we the undersigned agree hereby not to hold the advocate(s) or his/their substitute responsible if the said case be proceeded ex-parte or dismissed in default in consequence of my/our absence from court when it is called for hearing and for the result of the said case, the adjournment costs whenever ordered by the court shall be of the advocate(s) which he/they may receive and retain himself/themselves. I/we the undersigned do hereby agree that in the event of the whole or part of the fees agreed by me/us to be paid to the advocate(s), if remain unpaid, he/they shall be entitled to withdraw from prosecution of the above said case until the same is paid and fee settled is only for the above said case and above court and I /we agree hereby that once fee is paid, I/we shall not be entitled for refund of the same in any case whatsoever.

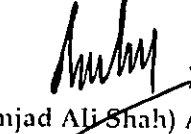
IN WITNESS WHEREOF, I /we do hereby set my/our hand to these presents, the contents of which have been read / read over, explained fully and understood by me/us on This 24th Day of June, 2017.

Thumb Impression / Signature(s) of Executant(s)

Accepted By:


Muhammad Ismail Alizai,
Advocate High Court.

Muhammad Ismail Alizai
Advocate High Court
Dera Ismail Khan


(Syed Amjad Ali Shah) Appellant.

BEFORE THE HONORABLE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 688/2017

Syed Inayat Ali Shah.....(Appellant)

Versus

Provincial Police Officer (IGP) KPK and others.....(Respondents)

Subject:- PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.NO.1 AND 2 ARE AS UNDER.

PRELIMINARY OBJECTIONS:-

1. That the appeal has not been based on facts.
2. That the appellant has got no cause of action and locus standi to file the appeal.
3. That the appeal is not maintainable in the present form.
4. That the appeal is bad for non-joinder and miss-joinder of necessary parties.
5. That the appellant is estopped to file the appeal.
6. That the appeal is barred by law and limitation.
7. That the appellant has not come to this Honorable tribunal with clean hands.

FACTS:-

1. Incorrect, the private Respondents No. 13 to 18 (DSsP) were senior to appellant and they were also promoted to the rank of DSP prior to the appellant therefore, the private respondents rank senior to appellant.
2. Para-2 of the appeal needs no comments as it pertains to the promotion of appellant to the rank of Deputy Superintendent of Police and posting at Anti Corruption Establishment Khyber Pakhtunkhwa.
3. Incorrect, the representation of appellant challenge the seniority list of DSsP of the year 2014, was not traced on the record.
4. Incorrect, appellant name was placed at due serial of the seniority list which was maintained in accordance with the rules and confirmation in the rank of Inspector and promotion to the rank of DSP.
5. Incorrect, as per provisions of Police Rules 1934 13.15 (4) the seniority list 'F' for promotion to the rank of Inspector will be in accordance with the date of entry to that list. The appellant was admitted to list 'F' on 05.04.2008 therefore he was

placed at proper serial number of the seniority in accordance with admission to this list and subsequently to proper place in seniority list of DSsP.

6. Incorrect, as per provisions of Police Rules 1934 13.15 (4) the seniority list 'F' for promotion to the rank of Inspector will be in accordance with the date of entry to that list. The appellant was admitted to list 'F' on 05.04.2008 therefore he was placed at proper serial number of the seniority in accordance with admission to this list-F and subsequently to proper place in seniority list of DSsP. Private Respondents No. 3 to 18 are senior to the appellant in accordance with date of admission to seniority list 'F' and date of promotion as officiating Inspector. The appellant was admitted to 'F' list in the year 2008, while the Respondents No.3 to 18 were admitted to this list in the year 2006 and 2007, similarly, appellant was promoted as Officiating Inspector in the year 2010 and the respondents were promoted as officiating Inspector in the year of 2007 and 2008. Therefore appellant was placed in the seniority list of DSsP in his due Place in accordance with seniority.
7. Correct to the extent that appellant filed representation by challenging the DSPs list issued on 06.02.2017. The representation of the appellant was in process, in due course he filed instant service appeal, hence in the light of rulings of Apex Court the Departmental Authority has become Functus Officio to deal with an appeal, representation or review petitions.
8. Incorrect, the appeal is not maintainable on the given grounds.

GROUNDS:-

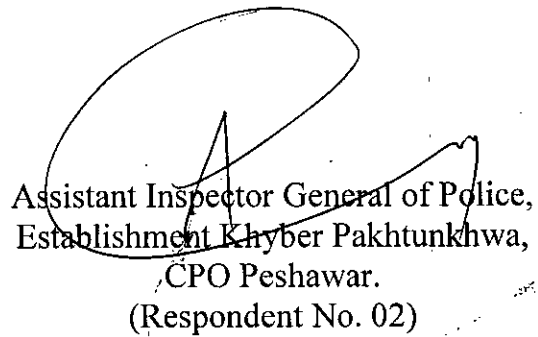
1. Incorrect, the notification of seniority of DSsP was issued in accordance with rules and the appellant was placed at his correct place of seniority list under PR 13.15 (4) from the date of admission to the list 'F', date of officiating promotion to the rank of inspector, and promotion to the rank of DSP, hence the notification is sustainable.
2. Incorrect, the seniority of the appellant was fixed in accordance with Police rules and no discrimination or in justice has been done.
3. Incorrect, the notification was issued in accordance with rules and the name of appellant was placed at his own number according to his seniority, hence the notification is maintainable.
4. Incorrect, the seniority list 2017 was issued in accordance rules and the appellant was placed at his correct serial number in the list according to his seniority.
5. Incorrect, the appeal of appellant is not supported by any law and rules.

6. Incorrect, appellant has wrongly approached this Service Tribunal as his seniority has correctly been fixed.
7. The respondents may also be allowed to raise other grounds during hearing of the case.

It is therefore, prayed that the appeal of appellant may please be dismissed with costs.



Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No.01)



Assistant Inspector General of Police,
Establishment Khyber Pakhtunkhwa,
CPO Peshawar.
(Respondent No. 02)

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR
CAMP AT DERA ISMAIL KHAN

Service Appeal No. 688/2017

Syed Inayat Ali Shah

...(Appellant)

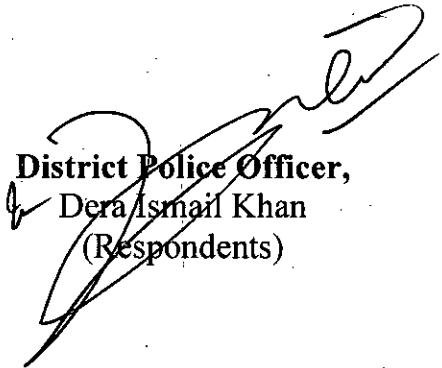
Versus

Provincial Police Officer (IGP) KPK and others

...(Respondents)

A U T H O R I T Y

DSP/Legal, DIKhan is hereby authorized to appear before the KPK Service Tribunal Peshawar Camp Court at D.I.Khan on behalf of Respondents. He is also authorised to produce/ withdraw any application or documents in the interest of Respondents and the Police Department.


District Police Officer,
Dera Ismail Khan
(Respondents)



BAR COUNCIL

MUHAMMAD ABDULLAH

Advocate High Court

N.I.C. 12101-0988149-7

S.No. 1288



Issued Authority

وکالت نامہ

کورٹ
فیس

Before the Honourable K.P. Service Tribunal
Respondent no. 7

Camp: D. Khan

سید عنایت شاہ
پولیس

دعویٰ یا جرم

Service appeal #

تفصیل دعویٰ یا جرم

باعث تحریر آنکے

D. I. Khan

مقدمہ مندرجہ بالا عنوان میں اپنی طرف دانستے بیرونی و جواب دہی برائے پیشی یا تصفیہ مقدمہ

Muhammad Abdullah Baloch A/c

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ بیرونی غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صمد مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صمد پکھری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آنے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے دانستے کسی معاوضہ کے ادا کرنے یا محنت نہ دہا جس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے جج کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذکری نظر ثانی اپیل عمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ناٹھی یا راضی نامہ و فیصلہ برطرف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مرکوز بیرون از پکھری صمد بیرونی مقدمہ مرکوز نظر ثانی اپیل و عمرانی و ہر قسم مقدمہ یا منسوخی ذکری ایک طرف یا درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از فیصلہ اجراء ذکری بھی صاحب موصوف کو بشرط ادا جسکی علیحدہ مختصم بیرونی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مرکوز یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل عمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں ذہنی اور دینی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانب التواء پڑنے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

مورخہ 11 ماہ مارچ 2018

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted
Advocate

Respt. 7

Handwritten signature

From The Capital City Police Officer,
Peshawar.

To The Learned Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

No. 1911 /LB, dated Peshawar the 22/11/2018.

Subject: **Appeal No.688 of 2017**
Syed Inayat Ali Shah....Appellant/Petitioner
Versus
The, PPO, PeshawarRespondent

Sir,

Notice to Mr.Mohammad Tahir Khan DSP in the subject appeal received in this office for service upon him for following the appeal either personally or by authorized representative or advocate, wherein next date is fixed for 28.11.2018.

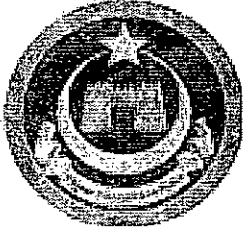
It is to inform you that Mr.Mohammad Tahir Khan now SP/Rural Peshawar has been missing since 26th October 2018 from the vicinity of Islamabad, for the said mishap a criminal case vide FIR No.450 dated 26.10.2018 u/s 365 PPC has been registered at PS Ramna Islamabad(Copy attached). However he has been fallen prey of the ugly incidents of terrorism and has been martyred.

Capital City Police Officer,
Peshawar.

Placed on relevant
file -

22/11/18

Read this



Office of the Superintendent of Police
Rural Division, Peshawar.

W
No-1886-LB
19/11/18

No. 2934 /PA.

Peshawar, dated the 09 /11/2018

To: **The Senior Superintendent of Police
Operations, Peshawar**

No: 2886 FA
Dt: 16-11-2018
Senior Superintendent of
Police Operations Peshawar

Subject: **Presence for hearing of SP Tahir Khan Dawar.**

Memo:

It is submitted that SP Rural Tahir Khan Dawar is missing since 26 October 2018 but a notice on his name is received to this office which is attached herewith.

The learned forum may be informed that notice will be served upon him when he arrives safe and sound please.

**SUPERINTENDENT OF POLICE RURAL,
PESHAWAR**

DSP-Legal.
For uia P.

Senior Superintendent of Police
Operations, Peshawar



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

No. 28 /Legal dated Peshawar, the 02/01/2019.

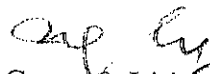
To: - The Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Judicial Complex old Khyber Road,
Peshawar.

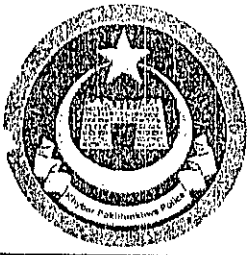
Subject:- SERVICE APPEAL NO. 688/2017 TITLED SYED INAYAT ALI
SHAH & OTHERS.

Memo:-

As per report of Supdt: Establishment-I CPO Peshawar, the Deputy
Superintended of Police Muhammad Tahir (Dawar) now acting SP Rural Peshawar has
been martyred, submitted for information please.

(Copy enclose).


SP Court & Litigation
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar
Fax No. 091-9210927

No. 1191 /SE-I

Dated Peshawar

31 Dec, 2018

To : The Superintendent of Police,
Court & Litigation,
CPO, Peshawar

Subject: **NOTICE**
Memo:

Please refer to your office memo: No.4853/Legal, dated 27.12.2018 on the subject cited above.

Mr. Muhammad Tahir Khan Dawar, the then Acting SP Rural CCP, Peshawar has been martyred.

(OFFICE SUPDT:)

Establishment-I

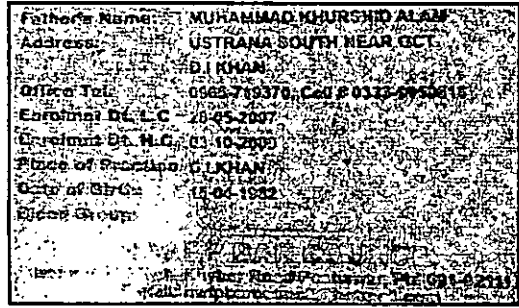
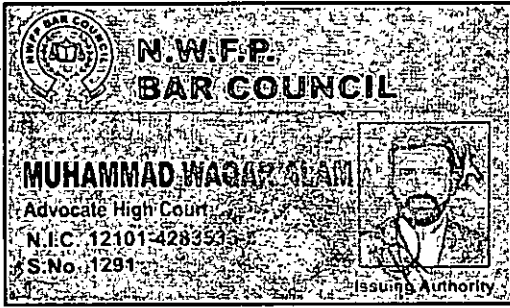
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even.

Copy forwarded to the:-

1. Registrar, CPO, Peshawar
2. Central Registry CPO Peshawar.

وکالت نامہ



Before Honorable ST. Camp Court جناب سٹیمپ کورٹ

Respondent No # 7 مجاہد

Syed Inayat Ali Shah نام KPK 816

Service appeal دعویٰ یا جرم
تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ڈی جی کیلئے

محمد وقار عالم ایڈووکیٹ ہائی کورٹ

کوسب ذیل شرائط پر وکیل مقرر کی ہے، کہ ہر پیشی پر خود بذریعہ اختیار حاصل رو برو عدالت حاضر ہوتا رہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر مظر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر بکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا ایماں واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو مرضی دعویٰ یا جواب دعویٰ یا درخواست اجراءے ڈگری و نظر ثانی اپیل و گرانے و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر جانشی یا راضی نامہ و فیصلہ پر حلف کرنے، اقبال و دعویٰ کا بھی اختیار ہوگا، اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از بکھری صدر بیروی مقدمہ مذکورہ نظر ثانی اپیل و گرانے و در آمد کی مقدمہ یا سٹوڈی ڈگری یکطرفہ یا درخواست حکم اتناشی یا ترقی یا گرفتاری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا کیلیک ملحد جتانہ بیروی کا اختیار ہوگا اور تمام ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزوی کاروائی یا بصورت درخواست نظر ثانی اپیل یا گرانے یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا پیر سٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں، اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور وہ ان مقدمہ میں جو کچھ ہر جائز التواء پڑے، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ کسی مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے۔ تاکہ سند رہے

مورخہ 21 20 02 20

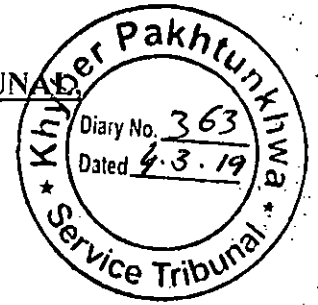
مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد _____ العبد _____ العبد _____

محمد وقار عالم ایڈووکیٹ ہائی کورٹ

Respondent No - 7

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR



S.A ~~Sp~~ P.No. 688/2017

put up to the court with relevant appeal.

Syed Inayat Ali Shah

Vs

The PPO KPK etc.

13/3/19

APPLICATION FOR TRANSFERRING THE INSTANT APPEAL FROM CAMP COURT D.I.KHAN TO PRINCIPAL SEAT AT PESHAWAR.

Readw.

RESPECTFULLY SHEWETH:

1. That the above instant appeal is pending before this august Court and fixed for 22.04.2019 at D.I Khan.
2. That at the time of filing instant appeal, the appellant/applicant was posted at D.I.Khan, therefore, his appeal was transferred to Camp Court D.I.Khan for adjudication.
3. That during the pendency of appeal, the appellant/applicant has been transferred to Peshawar due to which the appellant/applicant faces great hardships in pursuing the case at Camp Court D.I.Khan.
4. That as the principal is also functioning at Peshawar and the appellant/applicant has also been posted at Peshawar presently, therefore, there is not legal hurdle to transfer and fixed the case for hearing in Principal Seat at Peshawar.

It is, therefore, most humbly prayed that the appeal titled above may be transferred to Principal Seat Peshawar from Camp Court D.I.KHAN and may very kindly be fixed on any convenient date at Peshawar along with request to issue notice to the respondents for hearing at Peshawar accordingly.

PETITIONER/APPLICANT

Syed Inayat Ali Shah

04-03-2019

As there are contesting private respondents in this case who are being represented by local counsel from D.I.Khan, all remain on the diary of Camp Court D.I.K.

I have declared that the contents of application are true and correct to the best of my knowledge and belief

DEPONENT

[Signature]
14/3/19

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DIKHAN

In SA NO. 688/2018

Syed Inayat Ali Shah

VERSUS

PPO(IGP) KPK, etc


PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.
4 (Abdul Hai)

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Date : 26 /08/2019

Your humble respondents No. 4


DSP Abdul Hai MR/56

Through counsel:-



BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DIKHAN

In SA NO. 688/2018

Syed Inayat Ali Shah

VERSUS

PPO(IGP) KPK, etc

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.
4 (Abdul Hai)

Respectfully Sir;

Parawise comments on behalf of respondent No.4 are as under:-

PRELIMINARY OBJECTIONS

- a. That petitioner has got no cause of action and locus standi in the matter.
- b. That the appeal is not competent, as the controversy agitated therein is based on wrong interpretation of laws and rules.
- c. That the appeal has not been based on true facts, appeal is barred by law of limitation.
- d. That appellant is estopped by his own conduct to file the instant appeal.
- e. That, as per version of appellant, seniority list 2014 was issued and challenged by the appellant through representation only and did not filed service appeal in court. Thus, appellant is estopped to file instant appeal on the same ground. The appeal is hit by doctrine of estoppel, wavier and acquiescence.

- f. That appeal is bad for misjoinder and non-joinder of parties.
- g. That appellant has not approached this august forum with clean hands.
- h. That the relief claimed by the appellant is against Police rules.
- i. That the appellant is at proper place in seniority list in terms of Police rules, 1934. However, the answering respondent has also challenged seniority list issued on 22/03/2018 on the basis of inter-se seniority with his batch mates on the basis of seniority assigned on the merit by the Public Service commission. In this respect the answering respondent has also filed service appeal No.991/18, which is pending before this Worthy Tribunal.
- j. That the appellant was admitted to list 'F' later than the present answering respondent. Therefore, he was placed at proper serial number in accordance with admission to the said list and subsequently to proper place in seniority list of DSsP.

REPLY ON FACTS

1. Para No 1 is correct to the extent of induction of appellant in police department as Assistant Sub Inspector; rest of the para is incorrect, hence not admitted. The appellant has referred notification No. 1916 dated 20/02/2010 issued from the Office of DPO Dera Ismail Khan which allegedly pertains to date of confirmation of the appellant in the rank of Sub Inspector but has not annexed any copy thereof. The appellant has also

referred notification no. 18414/E-II dated 30/07/2010 which is the date of inclusion of the appellant's name in list 'F'. The appellant has also not annexed and deliberately concealed judgment of the Service Tribunal dated 23/07/2009. In fact the matter before the Service Tribunal was the expunction of adverse remarks against the appellant and was not at all related to the date of confirmation of the appellant. Moreover, even if it was so, only the DPC would have been a proper authority to discuss the date of confirmation of the appellant in the light of judgment of Service Tribunal and confirmation order must have bearing the verdict of Worthy Service Tribunal. If it is so, then order of the confirmation of the appellant does not bear any force and against the law, rules and procedure. The record, the appellant has annexed with the service appeal is silent about the probationary period after his confirmation as Sub Inspector. The record is also silent about the date of inclusion of his name into list "E". The answering respondent is senior to the appellant and was promoted to the rank of DSP prior to the appellant therefore, the answering respondent rank senior than appellant. The answering respondent was promoted to rank of DSP (BPS-17) on regular basis vide notification No. 3814 dated 19/07/2013 whereas appellant was promoted on 24/01/2014.

2. Para no.2 related to the record needs no reply. However, the answering respondent was admitted to list "F" on 08/01/2007 and was promoted as Officiating Inspector on 27/03/2007. Subsequently the answering respondent was confirmed as Inspector vide notification No. 2739 dated 28/01/2010. While appellant was confirmed as Inspector on 23/12/2011, much later to the answering respondent. Copies annexed.

3. Para No.3 is also related to the record. If appellant has challenged the seniority list of Deputy Superintendent of Police during the year 2014 through a representation but did not file any appeal in any competent court then the case of the appellant is hit by the doctrine of waiver, estoppel and acquiescence. Moreover, the appellant has not specifically challenged date of admission into list "E" and "F".
4. Para no.4 is incorrect, not admitted. Appellant's name was placed at due serial of the seniority list which was maintained in accordance with the rules and inclusion of the names in **seniority list 'F' as per provision Police Rules, 1934, 13.15(iv)**. However seniority list of Dy; Superintendent of Police dated 19/03/2019 has also been issued wherein appellant is at serial No. 66 whereas the answering respondent is at serial No. 54. However fresh seniority list dated 22/03/2018 has also been issued wherein answering respondent was placed at serial No. 67. The answering respondent has also challenged the said seniority list on the basis of inter-se seniority with his batch mates on the basis of merit assigned by Public Service Commission. According to that the answering urged for his placement at serial No. 30 instead of serial No. 67. Service appeal is also pending regarding this controversy. Copy of the service appeal and seniority list dated 22/03/2018 is annexed.
5. Para no. 5 is incorrect, not admitted. The para is incorrect even in terms of true interpretation of Police Rules, 1934. Rule 13.15(iv), the seniority list 'F' for promotion to the rank of inspector will be in accordance with the date of entry to that list. The appellant was admitted to list 'F' on 30/07/2010, subsequent to the answering respondent as answering respondent was admitted to list 'F' on 20/12/2006. Therefore,

he was placed at proper serial number of seniority in accordance with admission to that list and proper place in seniority of DSsP.

6. Para no. 6 is incorrect hence, denied. Placement of appellant in the seniority list is not a clerical mistake rather his placement is very much according with the law and the rules. Private respondent's no. 3 to 18 (DSsP) are senior to appellant and all were also promoted not only to the rank of Off: Inspector and confirmed Inspectors but also to the rank of DSP prior to the appellant therefore, the private respondents including the answering respondent rank senior to the appellant. Police Rules, 1934 rule 13.15(iv), seniority list 'F' for promotion to the rank of inspector will be in accordance with the date of entry to that list. Appellant was promoted as officiating 30/07/2010 whereas the answering respondent was promoted as officiating inspector on 27/03/2007. Therefore the appellant was placed in the seniority list of the DSsP in his due place in accordance with seniority.
7. Para no.7 is pertains to the record. However appellant has not filed the representation according to the law and rules.
8. Para no. 8 is incorrect. Appeal is not maintainable on the given grounds

GROUND-WISE REPLY

1. Incorrect. The appellant was placed at his correct place of seniority list under PR 13.15(iv), from the date of admission to the list 'F', date of officiating promotion to the rank of inspector and promotion to the rank of DSP, hence notification is very much according to the

law and rules. Moreover, the answering respondent has also challenged and filed a Service Appeal which is pending before this Worthy Tribunal. Urging therein the correction and placement of his name according to the inter-se-merit which his batch mates issued by KPK Public Service Commission. The answering respondent was at the top with his batch mates. If this is so, answering respondent is even then senior to the appellant.

2. Incorrect, seniority of appellant was fixed in accordance with PR and no discrimination or injustice has been done.
3. Incorrect, and the name of the appellant was placed at his own number according to the seniority and date on admission to list "F". However, the appellant has not specifically challenged his date of entry to list "F".
4. Incorrect, appellant was placed at his correct serial number at the list. However, answering respondent has also challenged inter-se seniority according to merit assigned by Public Service Commission. Seniority list is correct according to the rule of entry in list "F", but is subject to correction in terms of batch wise seniority by merit in public service commission. According to merit assigned by public service commission answering respondent was on top i.e S.No.1 whereas appellant was on 13th position in merit of public service commission. Thus, the answering respondent is senior to the appellant on this score too.

The seniority of DSsP is to be reckoned from the date of entry to the list 'F'. Moreover date of confirmation of appellant as Sub Inspector is also ambiguous as the appellant has not annexed the necessary record in this respect.

5. Incorrect, the appeal of the appellant is not supported by any law and rules.
6. Incorrect, the appellant has wrongly approached this Service Tribunal as the seniority has correctly been fixed.
7. The counsel for the answering respondent may also be allowed to raise additional grounds during the arguments.


It is therefore prayed that appeal of the appellant may please be dismissed with cost.

Date :26/08/2019

Your humble respondents No. 4

DSP Abdul Hai

Through counsel:-


Muhammad Abdullah Baloch
Advocate High Court DIKhan.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DIKHAN

In SA NO. 688/2018

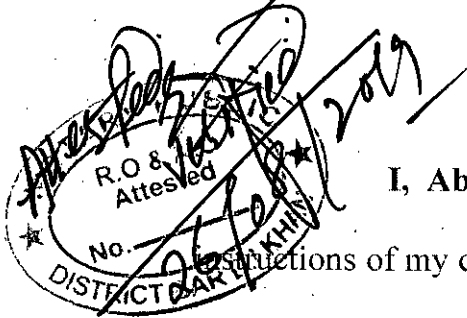
Syed Inayat Ali Shah

VERSUS

PPO(IGP) KPK, etc

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 4 (Abdul Hai)

AFFIDAVIT



I, **Abdul Hai**, answering respondents No. 4, as per instructions of my clients, do hereby solemnly affirm on oath that all contents of the parawise comments are true and correct to the best of my knowledge, belief and information as communicated to me; that nothing has been deliberately concealed or kept secret from this Honourable Tribunal.

26 /08/2019

 Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 991/18 2018

Abdul Hai Khan, Deputy Superintendent of Police Presently Posted As Assistant Director (Crimes), Anti-Corruption Establishment at D. I. Khan.

Appellant

VERSUES

1. Govt; of Khyber Pakhtunkhwa through the Chief Secretary, Govt; of Khyber Pakhtunkhwa, Peshawar.
2. The Secretary to the Govt; of Khyber Pakhtunkhwa, Home and Tribal Affairs Department, Peshawar.
3. The Provincial Police Officer, Central Police Office, Peshawar.
4. The Addl; Inspector General of Police, Head Quarters; CPO, Peshawar.
5. Mr. Nazir Ahmad, DSP C/O Central Police Office, Peshawar,
6. Mr. Saqeed Akhtar, DSP C/O Central Police Office, Peshawar,
7. Mr. Mohammad Ayaz, DSP C/O Central Police Office, Peshawar,
8. Mr. Mohammad Jamil, DSP C/O Central Police Office, Peshawar,

Respondents

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST FINAL SENIORITY LIST ISSUED VIDE NOTIFICATION OFFICE
ENDST; NO. 307/SE-I DATED 22/03/2018 BESIDES OMISSION ON PART OF
RESPONDENT NO 3 AND 4 FOR INDECISION OF DEPARTMENTAL
REPRESENTATION DATED 19/04/2018 FORWARDED THROUGH PROPER
CHANNEL TO COMPETENT AUTHORITY

Respected Sir;

1. That the applicant is serving as Deputy Superintendent of Police (BS-17) and currently posted as Assistant Director (Crimes) in Anti-Corruption Establishment at Dera Ismail Khan.
2. That the applicant was appointed as Assistant Sub Inspector (BS-9) in KPK Police Department on the recommendation of KPK Public Service Commission on 01/02/1995 and was placed at Top of the merit list at Serial No 1. Copy of the order is at Annexure-A. (7)
3. That a departmental final seniority list has been prepared vide Office Endst; No. 307/SE-I dated 22/03/2018 wherein the applicant has been placed at Serial No 67 of Deputy Superintendent of Police (BS-17) i.e below the name of Mr. Nazir Khan and above the name of Mr. Mohammad

Handwritten signature/initials

(13)
(27)

(19)

*1

Tahir while the officers junior to the applicant have been placed at Serial No 30 and below in the list ibid and all of them were placed below in merit which for all intent is erroneous and wrongly placed. Copy of Seniority List is attached as **Annexure-B**.

4. That to the dismay of the applicant his position has been disturbed by the dint of Seniority List, effective 22/03/2018 issued over notification ibid, depriving the applicant wrongly of his Seniority position by placing him at serial No 67 much below to his junior while the initial merit of Public Service Commission ensures without change in subsequent events concerning Seniority of batch-wise contemporaries.
5. That the Applicant is to be placed at serial No 30 of the said Seniority List in place of Mr Tauheed in light of the relevant rules whereby seniority is reckoned in accordance with the placement of successful candidates inducted through Provincial Public Service Commission, Peshawar.
6. That in view of the Rule 17 sub rule 1 (a) of the KP Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 'The Seniority inter se of civil servants shall be determined in case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission.'
7. That also according to the Rule 2 (2) of the Civil Servants (Seniority) Rules, 1993 "If two or more persons are recommended in open advertisement by the Selection Authority their inter-se seniority shall be determined in order of merit assigned by the selection authority".
8. That the Seniority List for the year 2018 is apparently based on err and an outcome of improper reckoning due to misreading of records etc. A blatant proof of erroneous reckoning of seniority in the impugned list is that even those inducted in service much later than the petitioner i.e M/S Nazir Ahmad, Saeed Akhtar, Mohammad Ayaz, and Mohammad Jamil are placed at serial number 48 to 51 and thus much above the applicant though all of them are junior to the Applicant.
9. That as per Rule 17 (2) of the KPK Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 "Seniority in the various cadres of the civil servants appointed by initial recruitment vis-a vis those appointed otherwise shall be determined with reference to their dates of their regular appointment to a post in that cadre".
10. That according to Section 3 (4) of the KPK Civil Servant Act, 1973. "Seniority in a post, service or cadre to which a civil servant is promoted shall take effect from date of regular (initial) appointment".

- 11. That the applicant is entitled for equal treatment as per Article 25 of the Constitution of Islamic Republic of Pakistan and his Seniority may be considered from the merit list of the Public Service Commission Peshawar as per dictum laid down by the superior courts.
- 12. That the Appellant being aggrieved of the impugned Final Seniority List preferred a Departmental Appeal/ Representation to Respondent No 3 on 19/04/2018 forwarded through proper channel to competent authority to entertain the same. Copy attached at **Annexure-C**.
- 13. That the Appellate authority has not decided representation of the appellant regarding grievances as yet hence the appellant being aggrieved person has a right and cause of action to file instant appeal before this Honourable Services Tribunal inter alia on the following grounds.

GROUNDS

- 1. That the Appellant has not been provided equal treatment when there is no express inhibition against him under the law and has also not been given equal protection of law, which is discriminatory instance of arbitrariness and is against the principles enshrined in Articles-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- 2. That the Appellant has been subjected to injustice and the case of Appellant has not been dealt with under the principle of the fair play.
- 3. That the impugned notification of the Respondents No. 3 and also the procedure adopted is wrong in the exercise of jurisdiction is in excess of jurisdiction and misapplication of clear rules.
- 4. That the impugned seniority list is against the settled laws and rules of Seniority in service and no legal footings hence ineffective upon the rights of appellant.
- 5. That the impugned seniority list is in violation of rules and statutory provisions as well as the dicta of superior courts pronounced in a number of judgments, hence the same needs to be corrected.
- 6. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under Appeal.
- 7. That the counsel for Petitioner/ Appellant may be allowed to argue additional grounds at the time of arguments.

Copy Attached

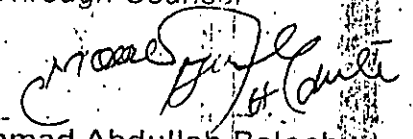
It is, therefore, humbly prayed that on gracious acceptance of the instant Service Appeal, the impugned Final Seniority list dated 22/03/2018 may please be set aside/nulified and the appellant may be declared and placed

at Serial No 30 i.e above Mr Tauhid Khan in accordance with seniority rules as envisaged in Estta Codes and Civil Service regulations.

Yours Humble Appellant

(ABDUL HAI KHAN)
Through Counsel

Dated: /08/2018



Mohammad Abdullah Baloch
(Advocate High Court, D.I.Khan)

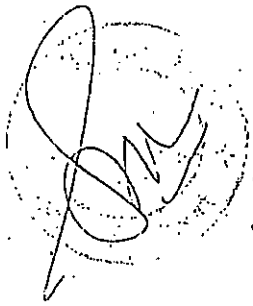
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO _____ 2018

ABDUL HAI KHAN VS Govt of KPK etc

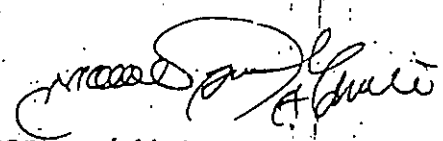
AFFIDAVIT

I, ABDUL HAI KHAN, the Appellant, do hereby solemnly affirm and declare on oath that all the Para vise contents of above service appeal are true & correct to the best of my knowledge, belief and information so provided to me and that nothing has been deliberator concealed from this Hon'ble Service Tribunal.



Deponent

(ABDUL HAI KHAN)
(Through counsel)



Mohammad-Abdullah Baloch
(Advocate High Court, D.I. Khan)

7

On the recommendation of NWFP. Public Service Commission, the following candidates have been approved for appointment as Probationer Asstt: Sub-Inspectors ^{on 3 years Probation} in the B.P.S. No. 9 (Rs. 1805-97-3060) along with usual admissible allowances with effect from 01.02.1995.

They are allotted Range numbers and posted to the district as noted against their names:-

Sl. No.	NAME, FATHER NAME & ADDRESS.	RANGE NO. ALLOTTED.	DISTRICT TO WHICH POSTED.
1.	Abdul Hai Khan s/o Ahmad Saeed Khan, r/o village Chaudhwan, Distt: DIKhan.	27/D.	DIKhan Distt:.
2.	Syed Inayat Ali Amjad s/o Syed Murad Ali Shah, r/o Village Thathal. P.O. Mandran Kalan, Chashma Road, DIKhan.	28/D.	DIKhan Distt:.
3.	Kalimullah s/o Hafiz Basair Ahmad, P.O. Haji Mora, DIKhan.	37/D.	DIKhan Distt:.
4.	Zia Hassan s/o Gul Hassan, village Khanu Khel, DIKhan.	45/D.	Tank Distt:.
5.	Salah-ud-Din Ayub s/o Rehatullah, Village & P.O. Darraki, Tan: & Distt: Tank.	46/D.	Tank Distt:.
6.	Shafiqullah Khan s/o Anahullah Khan village & P.O. Mainai, Tensil Kullacai, Distt: DIKhan.	47/D.	Tank District.
7.	Mohammad Nafeem Siddiqi s/o Ghulam Yaseen, Siddiqi House Fahir Abad, behind Commerce College, DIKhan.	48/D.	DIKhan distt:.
8.	Fauhid Khan s/o Abdul. Hamid Khan, Village Kirri Malang, Distt: DIKhan.	49/D.	DIKhan Distt:.

As force

(M. RAHMAN KHAN)

Inspector General of Police,
Dera Ismail Khan.

No. 236-38 /ES DATED DIKhan. PHL Feb: 1, 1995

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

1. Superintendent of police, DIKhan.
 2. Superintendent of police, Tank.
- The Verification Rolls and M/Fitness certificate of S.No. 4, 5 & 6 are enclosed.
3. Asstt: Office Supt: Range Office, DIKhan.

Necessary Gazette Notification should be issued accordingly. The documents received with his Memo. No. 720 dt. 15.1.95 & No. 1004 dt. 15.1.95, are returned herewith.

ORDER.

The following Probationary Assistant Sub-Inspectors of DIKhan Range, are hereby approved for confirmation as Assistant Sub-Inspectors after completing their three (3) years probationary period with effect from 1.2.1995 :-

1. PASI Shafiullah, No. 47/D of DIKhan district.
2. P/ASI Mohammed Nadiq, No. 48/D of DIKhan distt.
3. P/ASI S. Inayat Ali Anjad, No. 28/D
4. P/ASI Abdul Husein, No. 27/D
5. P/ASI Zia Hassan, No. 45/D
6. P/ASI Touhid Khan, No. 49/D of Tank district.
7. P/ASI Kalimullah, No. 37/D of Tank district.
8. P/ASI Salah-ud-Din, No. 46/D of Tank district.

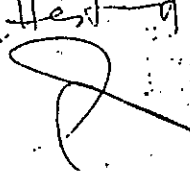
Annex "B"

(FAQIR HUSSAIN)
Dy. Inspector General of Police,
Dera Ismail Khan.

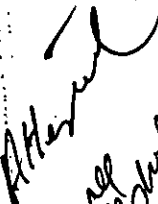
No. 35-17 /ES, Dated DIKhan the 9-3-1998.
Copy forwarded for information and necessary

action :-

1. Superintendent of police, Dera Ismail Khan, w/p to his memo No. 2887, dated 23.2.1998. Five duplicate copies of roll of above named P/ASIs returned herewith for record.
 2. Superintendent of police, Tank, w/p to his memo No. 16.2.1998. The duplicate copy of roll of ASI No. 37/D is returned herewith for record.
 3. Assistant Office Superintendent range office, DIKhan. The original character rolls of the above named P/ASIs are enclosed.
- Their Gazette Notification may be issued accordingly.

Attested by

14/3

(FAQIR HUSSAIN)
Dy. Inspector General of Police,
Dera Ismail Khan.

Attested by

26/3/98

for n-action

S.P. DIKhan

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ORDER

The following Assistant Sub Inspectors on Promotion List of Range have been approved by the DPC held on 19.01.2002 for promotion to Officiating Sub Inspector against the existing vacancies with immediate effect.

Their promotion will take effect from the date of taking up higher responsibilities: -

1. ASI Muhammad Nadeem No.48/D ✓
2. ASI S.Inayat Ali Amjad No.28/D ✓
3. ASI Abdul Hayee No.27/D ✓
4. ASI Zia Hassan No.45/D ✓

On promotion they are posted to the district as noted against each:-

SNo.	NAME	FROM	TO
1	OSI Muhammad Nadeem No.48/D	D.I.Khan Distt:	D.I.Khan Distt:
2	OSI S.Inayat Ali Amjad No.28/D	D.I.Khan Distt:	D.I.Khan Distt:
3	OSI Abdul Hayee No.27/D	D.I.Khan Distt:	D.I.Khan Distt:
4	OSI Zia Hassan No.45/D	D.I.Khan Distt:	D.I.Khan Distt:

10
Dy: Inspector
Dera

Endst: No. 153-59/ES dated D.I.Khan 22-1-2002

Copy forwarded to the: -

- 1-2. The Superintendents of Police, D.I.Khan & Tank, for information and necessary action. Their promotion Gazette Notification should be issued accordingly.

7c (ABID S EFD)
Dy: Inspector
Dera

Amir
per
Howes
Self

had	01.01.2010 to 13.05.2010
	01.08.2011 to 31.12.2011
	01.01.2012 to 31.12.2012
	01.01.2008 to 31.12.2008
	01.01.2009 to 31.12.2009
	01.01.2010 to 31.12.2010
	01.01.2011 to 02.05.2011
	5.09.2012 to 31.12.2012

Offg: Sub Inspector Abdul Hayee No.27/D on Promotion List 'E' of Tank District has been considered suitable for promotion to the rank of SI substantively on two years probation with effect from 19.5.2006 and confirmed in the rank from the same date as a special case in recognition of his outstanding performance reported by DPO/Tank in his memo: No.141/C dated 6.4.2006 after counting his officiating period towards probation, under Police Rule 13.18. He is allotted new Range No.D/1.

(ZULFIQAR AHMAD CHEEMA)

Dy. Inspector General of Police,
Dera Ismail Khan 2/5

No. 628 /ES dated D.I.Khan 20-5-2006

Copy to the District Police Officer, Tank for information, with reference to his memo: No.141/C dated 6.4.2006. Necessary gazette notification may be issued accordingly.

(ZULFIQAR AHMAD CHEEMA)

Dy. Inspector General of Police,
Dera Ismail Khan 10/5

Attended
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Chawes
20/5

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

NOTIFICATION

Dated: 21/1/2007.

No. 460 /E-II, PROMOTION LIST-F The names of the following confirmed Sub Inspectors of NWFP Police duly recommended by the DPC held on 20.12.2006 and approved by the Provincial Police Officer NWFP, Peshawar are hereby brought on promotion list F w.e.f 20.12.2006.

S/NO	NAME & NUMBER	HOME DISTRICT
1.	SI Hidayatullah No. D/5	DIKhan
2.	SI Iftikhar Shah MR/42	Mardan
3.	SI Arbab Khan No. D/30	DIKhan
4.	SI Shoukat Ali No. MR/53	Swabi
5.	SI Salah ud Din No. D/6	Tank
6.	SI Mushtaq Ahmad No. MR/52	Swabi
7.	SI Sajjad Ahmad No. MR/48	Swabi
8.	SI Fahir Iqbal No. H/63	Abbottabad
9.	SI Muhammad Javed No. H/73	Abbottabad
10.	SI Abdul Rashid No. MR/55	Lakki
11.	SI Muzammil Shah No. MR/51	Swabi
12.	SI Niaz Muhammad No. MR/13	Swabi
13.	SI Sahibzada Sajjad Ahmad No. MR/5	Swabi
14.	SI Momin Khan No. P/67	Charsadda
15.	SI Naveed Abas No. P/61	Kohat
16.	SI Nazir Khan No. MR/56	Mardan
17.	SI Abdul Hai No. D/1	DIKhan
18.	SI Amanullah No. P/71	Peshawar
19.	SI Ishfaq Ahmad No. MR/51	Swabi

(KHURSHID ALAM KHAN)

Addl: IGP/HQRs

For Provincial Police Officer,
NWFP, Peshawar.

No. 461-90 /E-II

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

- All Heads of Police Offices in NWFP.
- Assistant Secret CPO with 19 spare copies for placing in their Character Rolls.
- U.O.P File

110 83/63
dt 15-1-2007

Copy to DPO/Diam for info

DIG DIKhan

21/1/07

Attendant
20/1/07

14

3

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

Office NWFP District P... No 312 Date 3-1-07 DERA ISMA

NOTIFICATION

Dated: 27 / 1 / 07

No. 6327 /E-II, PROMOTION AS OFFG: INSPECTORS:

The following Sub Inspectors on list F of the Region/Unit noted against each have been examined by the DPC held on 15.03.2007 and approved by the Provincial Police Officer NWFP for promotion to the rank of Offg: Inspectors BPS-16 (4375-340-14575) with immediate effect:-

S/NO	NAME & NUMBER	HOME DISTRICT
1.	SI Hidayatullah No. D/5	DIKhan
2.	SI Arbab Khan No. D/30	DIKhan
3.	SI Shoukat Ali No. MR/53	Mardan
4.	SI Salah ud Din No. D/6	DIKhan
5.	SI Muhammad Hussain No. D/11	DIKhan
6.	SI Mushiq Ahmad No. MF/52	Mardan
7.	SI Sajjad Ahmad No. MR/48	Mardan
8.	SI Muhammad Javed No. F/73	Hazara
9.	SI Abdul Rashid No. MR/55	Mardan
10.	SI Muzammil Shah No. MF/51	Mardan
11.	SI Niaz Muhammad No. MR/13	Mardan
12.	SI Shah Hassan	Mardan
13.	SI Sahibzada Sajjad Ahmad No. MR/5	Mardan
14.	SI Momin Khan No. P/67	CCP/Peshawar
15.	SI Naveed Abas No. P/61	CCP/Peshawar
16.	SI Abdul Hai No. D/1	DIKhan
17.	SI Amanullah No. P/71	CCP/Peshawar

Their promotion will take effect from the date, they actually taking their higher responsibilities. Necessary Gazette Notification may please be issued accordingly. Their posting order will be issued separately.

Signature of Khurshid Alam Khan, Add: IGP/IQRs For Provincial Police Officer, NWFP, Peshawar.

No. 6328-31 /E-II

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

- Capital City Police Officer NWFP, Peshawar
- Deputy Inspector General of Police DIKhan, Mardan and Hazara Region.
- Assistant Secret CPO alongwith 17 spare copies for placing in their original Character Roll.
- U.O.P. File

271 / 3.4.07

No 956/E3 OK 31-3-2007 Copy to Dho Dan for info and

OB/Er For retention, Gul

Inspector General D.I.Khan, Range 31/3

Attended case 2007

**FOR PUBLICATION IN THE N.W.F.P POLICE GAZETTE PART-II
ORDERS BY THE DY: INSPECTOR GENERAL OF POLICE, D.I.KHAN REGION**

NOTIFICATION

Dated D.I.Khan the 11 — 5.2007

No. 1322-24/ES, PROMOTION AS OFFG: INSPECTOR. In pursuance of PPO / NWFP Peshawar endst: No. 6328-31/E-I dated 27.3.2007 and No. 9574-78/E-II dated 3.5.2007 the following Sub Inspectors on Promotion list "F" of D.I.Khan Region were promoted as Inspector in BPS-16 w.e.from 28.4.2007:

1. Inspector Salah-ud-Din No. D/6
2. Inspector Abdul Hayce No. D/1

(ZULFIQAR AHMAD CHEEMA)
Dy: Inspector General of Police,
Dera Ismail Khan

OFFICE OF THE DY: INSPECTOR GENERAL OF POLICE, D.I.KHAN REGION

No. 1322-24/ES

Dated D.I.Khan the 11 — 5.2007

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

1. The Addl. Inspector General of Police, Investigation, NWFP Peshawar. Two spare copies of the notification are enclosed for publication.
2. The District Police Officer, D.I.Khan.
3. The AOS, Range Office, D.I.Khan.

(ZULFIQAR AHMAD CHEEMA)
Dy: Inspector General of Police,
Dera Ismail Khan

*Attended
12/05/2007*

16

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

NOTIFICATION

Dated: 22/1/2010

NO. 2739

/E-II CONFIRMATION AS INSPECTOR:

The following Olig. Inspectors on list "E" of NWFP Police are hereby confirmed as Inspector with immediate effect.

S/NO	RANK & NAMES
✓ 1.	Salah ud-Din No. D/6
✓ 2.	Hidayat Ullah No. D/5
✓ 3.	Arbab Khan No. D/30
4.	Riaz ul Islam No. P/82
5.	Shoukat Ali No. MR/53
6.	Abdus Samad No. MR/54
7.	Muhammad Saddique No. H/77
8.	Naveed Abbas No. P.61
✓ 9.	Abdul Hayee No. D/7
10.	Usman Ghani No. B/113
11.	Muhammad Fair Ehsan No. B/2
✓ 12.	Muhammad Nadeem No. D/2
✓ 13.	Zia Hassan No. D/3

(ABDUL MAJEED KHAN MARWAT)

PSP

Addl: IG/PH-headquarters,
For Provincial Police Officer,
NWFP Peshawar.

No. 2747 - L.G. /E-II Dated Peshawar the 22/1/2010.

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

1. Addl: Inspector General of Police, Investigation NWFP, Peshawar with 2 spare copies for publication in NWFP Gazette Part-II.
2. Capital City Police Officer Peshawar.
3. All RPOs in NWFP.
4. Office Supdt: Secret. CPO Peshawar with 13 spare copies for placing in their Character Roll Dossier.
5. U.O.P File.

*Attended
Office
Peshawar
22/1/2010*

17

**OFFICE OF THE
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA, PESHAWAR.**

Dated Peshawar, the 19/07 2013.

NOTIFICATION

No. S/ 3814 /13. In pursuance of the provisions contained in Section-5 of the Khyber Pakhtunkhwa (Promotion of Superintendent of Police and Deputy Superintendent of Police) Rules-2007, the Competent Authority i.e Provincial Police Officer on recommendations of the Departmental Selection Committee meeting held on 16.07.2013 is pleased to promote the following Inspectors (BS-16) to the rank of Deputy Superintendent of Police (BS-17) on regular basis with immediate effect.

2. The officers on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15-(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

Their promotion will take effect from the date they actually assume the charge of higher responsibility:-

S. No.	Name and No.
1.	Inspector Naveed Abbas, P/61
2.	Inspector Nazir Khan, MR/56
3.	Inspector Abdul Hye, D/1
4.	Inspector Muhammad Tahir Khan, B/24
5.	Inspector Saleem Amanullah, P/71

Sd/-

(IHSAN GHAND)

Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. S/ 3815-45 /13, dated Peshawar, the 19/07 /2013.

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

1. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Govt: Khyber Pakhtunkhwa, E & AD Deptt: Peshawar.
5. Secretary Govt: Khyber Pakhtunkhwa, Finance Deptt: Peshawar.
6. Secretary Govt: Khyber Pakhtunkhwa, Home & T.As Deptt: Peshawar.
7. Accountant General, Khyber Pakhtunkhwa, Peshawar.
8. Addl: IGP/HQrs., Khyber Pakhtunkhwa, Peshawar
9. Addl: IGP/Operations, Khyber Pakhtunkhwa, Peshawar.
10. Addl: IGP/Special Branch, Khyber Pakhtunkhwa, Peshawar.
11. Addl: IGP/Investigation, Khyber Pakhtunkhwa, Peshawar.
12. Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
13. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
14. Commandant, PTC, Hangu.
15. Director General, FIA, Islamabad.
16. Capital City Police Officer, Peshawar.
17. All Region D.Is.G. of Police in Khyber Pakhtunkhwa.
18. A.Is.G. of Police, Traffic & Telecommunication, Khyber Pakhtunkhwa.
19. Director, FIA, Peshawar Zone, Peshawar.
20. Officer concerned.
21. Registrar, CPO, Peshawar.
22. Supdt: "E" Branch, CPO.
23. Manager Govt: Printing Press, KFK, Peshawar.
24. U.O.P. Files.
25. Office Copy.


(KHALID MASOOD)

Addl: IGP/HQrs:

For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

*Attended
26/07/13*

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP DIKHAN

In SA NO. 688/2018

Syed Inayat Ali Shah

VERSUS

PPO (IGP) KPK, etc

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 7 (Zia Hassan)

Respectfully Sir;

Parawise comments on behalf of respondent No.7 are as under:-

PRELIMINARY OBJECTIONS

- a. That petitioner has got no cause of action and locus standi in the matter.
- b. That the appeal is not competent, as the controversy agitated therein is based on wrong interpretation of laws and rules.
- c. That appellant is estopped by his own conduct to file the instant appeal.
- d. Appeal of the appellant is time barred.
- e. That, as per version of appellant, seniority list 2014 was issued and challenged by the appellant through representation only and did not filed service appeal in any competent court or Tribunal. Thus, appellant is estopped to file instant appeal on the same grounds.
- f. That appeal is bad for misjoinder and non-joinder of parties.
- g. That appellant has not approached this august forum with clean hands.
- h. That the relief claimed by the appellant is against Police rules.
- i. That appellant has been ranked on its proper place and position in terms of Rule 13.15 (4) of police rules 1934. The appellant is junior than the answering respondent as answering respondent was confirmed inspector and then promoted substantively as DSP much prior to the appellant.

- j. That appellant has not challenged the notification of his entry to list 'F' thus has been slumber upon his rights. Appellant has no right to challenge the seniority list without challenging notification of his entry to list 'F'.

REPLY ON FACTS

1. Para No. 1 is correct to the extent of induction of appellant in police department as Assistant Sub Inspector; rest of the para is incorrect, hence not admitted. The appellant has referred notification no. 1916 dated 20/02/2010 issued from the Office of DPO Dera Ismail Khan which allegedly pertains to date of confirmation of the appellant in the rank of Sub Inspector but has not annexed any copy thereof. The appellant has also referred notification no. 18414/E-II dated 30/07/2010 which is the date of inclusion of the appellant's name in list 'F'. The appellant has also not annexed and deliberately concealed judgment of the Service Tribunal dated 23/07/2009. In fact the matter before the Service Tribunal was the expunction of adverse remarks against the appellant and was not at all related to the date of confirmation of the appellant. Moreover, even if it was so, only the DPC would have been a proper authority to discuss the date of confirmation of the appellant in the light of judgment of Service Tribunal and confirmation order must have bearing the verdict of Worthy Service Tribunal. If it is so, then order of the confirmation of the appellant does not bear any force and against the law, rules and procedure. The answering respondent is senior to the appellant and was promoted to the rank of DSP prior to the appellant therefore, the answering respondent rank senior to appellant. The answering respondent was promoted to rank of DSP (BS-17) on regular basis vide notification no. S/20/14 dated 2-01-2014 whereas appellant was promoted on 24/01/2014.
2. Para. no.2 related to the record needs no reply. However the answering respondent was confirmed as Inspector prior to the appellant as he was confirmed as Inspector on 23/12/2011, much later to the answering respondent. Copies annexed.

3. Para No.3 is also related to the record. If appellant has challenged the seniority list of Deputy Superintendent of Police during the year 2014 through a representation but did not file any appeal in any competent court then the case of the appellant is hit by the doctrine of waiver, estoppel and acquiescence.

4. Para No.4 is incorrect, not admitted. Appellant's name was placed at due serial of the seniority list which was maintained in accordance with the rules and inclusion of the names in seniority list 'F' as per provision Police Rules, 1934, 13.15(iv). However, seniority list of Dy; Superintendent of Police dated 19/03/2019 has also been issued wherein appellant is at serial No. 66. The answering respondent was recruited in Kp Police department as assistant sub inspector (ASI) in the year 1995 after qualifying the public Service Commission competitive exam. After qualifying requisite training and course, the petitioner was given Offg: promotion to the rank sub inspector and being placed on promotion list 'E' promoted as sub inspector substantively on two years probation w.e.f 16-07-2005 vide DIG D.I.Khan office order No.1406-07/ES dated -19-05-2007. The answering respondent, in due course, was confirmed substantively in the rank of Sub-inspector vide Notification No.8807 dated 4-06-2007 issued by the office of DPO D.I.Khan, mentioned therein that respondent promoted substantively on two years probation w.e.f 16-07-2005 has been confirmed from the same date after counting his remaining Offg: period towards probation under police rules 13.18, DIG of Police of D.I.Khan Endst:No.1530-31/ES dated 01-06-2007. The petitioner subsequently was brought on promotion list 'F' and promoted to the rank of Offg: Inspector. The date of confirmation of the respondent in the rank of sub inspector has wrongly been revised w.e.f 01-07-2007 instead of 16-07-2005 vide CPO office No.17599/E-II dated 30.07.2007 without any justification. Though the said revised notification disturbed the seniority of the answering respondent but a representation has already been made to the competent authority which has been pending there. The answering respondent is senior to

the appellant in terms of rule 13.15(4) and was admitted to list 'F' much prior to the appellant. Respondent is senior as he has been confirmed as Inspector and DSP much prior than appellant.

5. Para No. 5 is incorrect, not admitted. The para is incorrect even in terms of true interpretation of Police Rules, 1934. Rule 13.15(iv), the seniority list 'F' for promotion to the rank of inspector will be in accordance with the date of entry to that list. Therefore, he was placed at proper serial number of seniority in accordance with admission to that list and proper place in seniority of DSsP.
6. Para No. 6 is incorrect hence, denied. Placement of appellant in the seniority list is not a clerical mistake rather his placement, is very much according with the law and the rules. Private respondent's no. 3 to 18 (DSsP) are senior to appellant and all were also promoted to the rank of DSP prior to the appellant therefore, the private respondents including the answering respondent rank senior to the appellant. Police Rules, 1934 rule 13.15(iv), seniority list 'F' for promotion to the rank of inspector will be in accordance with the date of entry to that list. Appellant was promoted as confirmed Inspector on 23/12/2011 whereas the answering respondent was promoted as confirmed inspector on 28/01/2010. Therefore, the appellant was placed in the seniority list of the DSsP in his due place in accordance with seniority.
7. Para No.7 pertains to the record. However, appellant has not filed the representation according to the law and rules.
8. Para no. 8 is incorrect. Appeal is not maintainable on the given grounds

GROUND-WISE REPLY

- a. Incorrect. The appellant was placed at his correct place of seniority list under police ruules 13.15(iv), from the date of admission to the list 'F', date of officiating promotion to the rank of inspector, date of confirmation as inspector and promotion to the rank of DSP. Appellant is junior to the answering respondent.

- b. Incorrect, seniority of appellant was fixed in accordance with police rules and no discrimination or injustice has been done.
- c. Incorrect, hence denied. Notification was issued in accordance with rules and the name of the appellant and the answering respondent were placed at their own number according to the seniority hence, the notification is maintainable.
- d. Incorrect, not admitted. Appellant was placed at his correct serial number at the list. The seniority of DSsP is to be reckoned from the date of entry to the list 'F'. Moreover date of confirmation of appellant as Sub Inspector is also ambiguous as the appellant has not annexed the necessary record in this respect. However, dates of probation period or benefit of rule 13.18 are ambiguous as appellant has not annexed relevant record with the appeal.
- e. Incorrect, the appeal of the appellant is not supported by any law and rules.
- f. Incorrect, the appellant has wrongly approached this Service Tribunal as the seniority/placement of appellant has correctly been fixed.
- g. The counsel for the answering respondent may also be allowed to raise additional grounds during the arguments.

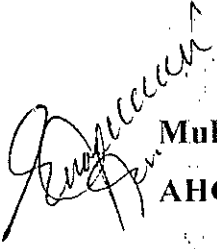
It is therefore prayed that appeal of the appellant may please be dismissed with cost.

Date : 24/08/2019

Your humble respondents No. 7

DSP Zia Hassan D/3

Through counsel:-


Muhammad Waqar Alam

AHC


Muhammad Abdullah Baloch

AHC

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DIKHAN

In SA NO. 688/2018

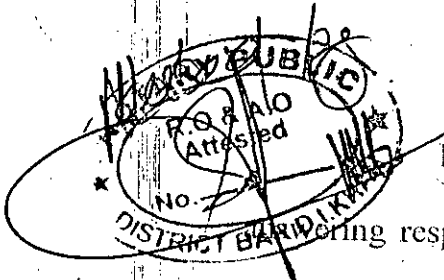
Syed Inayat Ali Shah

VERSUS

PPO(IGP) KPK, etc

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.
7 (Zia Hassan)

AFFIDAVIT



I, Muhammad Abdullah Baloch, counsel for the
deposing respondents No. 7, as per instructions of my clients, do
hereby solemnly affirm on oath that all contents of the parawise
comments are true and correct to the best of my knowledge, belief
and information as communicated to me; that nothing has been
deliberately concealed or kept secret from this Honourable Tribunal.

26/08/2019


26/8
Deponent

(7)

OFFICE OF THE
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA, PESHAWAR.
Dated Peshawar, the 02/01/2014.

NOTIFICATION

No. S/20/14. In pursuance of the provisions contained in Section-5 of the Khyber Pakhtunkhwa (Promotion of Superintendent of Police and Deputy Superintendent of Police) Rules-2007, the Competent Authority i.e Provincial Police Officer on recommendations of the Departmental Selection Committee meeting held on 08.11.2013 is pleased to promote the following Inspectors BS-16) to the rank of Deputy Superintendent of Police (BS-17) on regular basis with immediate effect.

The officers on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989. Their promotion will take effect from the date they actually assume the charge of higher responsibility.

S. No.	Name and No.
1.	Inspector Muhammad Javed, H/41
2.	Inspector Muhammad Nadeem, D/2
3.	Inspector Zia Hassan, D/3 (Subject to repatriation from ACE)
4.	Inspector Khalid Khan, H/59
5.	Inspector Mirzali Khan, K/12
6.	Inspector Said Khan, K/5
7.	Inspector Muhammad Ashraf, K/11
8.	Inspector Adnan Orakzai, P/4 (Subject to repatriation from ACF)
9.	Inspector Shafiullah, P/17
10.	Inspector Rafiullah, P/29

Sd/-
NASIR KHAN DURRANI
Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

No. S/21+50/14, dated Peshawar, the 02/01/2014.
Copy of above is forwarded for information and necessary action, to the -

1. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Govt. Khyber Pakhtunkhwa, AD Deptt. Peshawar.
5. Secretary Govt. Khyber Pakhtunkhwa, Finance Deptt. Peshawar.
6. Secretary Govt. Khyber Pakhtunkhwa, Home & T.A. Deptt. Peshawar.
7. Accountant General, Khyber Pakhtunkhwa, Peshawar.
8. Addl. IGP/HQrs., Khyber Pakhtunkhwa, Peshawar.
9. Addl. IGP/Operations, Khyber Pakhtunkhwa, Peshawar.
10. Addl. IGP/Special Branch, Khyber Pakhtunkhwa, Peshawar.
11. Addl. IGP/Investigation, Khyber Pakhtunkhwa, Peshawar.
12. Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
13. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
14. Commandant, PTC, Hangu.
15. Director General, FIA, Islamabad.
16. Capital City Police Officer, Peshawar.
17. All Region D.Is.G. of Police in Khyber Pakhtunkhwa.
18. A.Is.G. of Police, Traffic & Telecommunication, Khyber Pakhtunkhwa.
19. Director, FIA, Peshawar Zone, Peshawar.
20. Officer concerned.
21. Registrar, CPO, Peshawar.
22. Supdt. "E" Branch, CPO.
23. Manager Govt. Printing Press. KPK, Peshawar.
24. U.O.P. Files.

Attested
26/1/14

DSK
ORDER

On promotion as Deputy Superintendents of Police (BPS-17) the following transfer/posting of DSsP are hereby ordered with immediate effect:-

Name of Officers	From	To
Mr. Adnan Orakzai	On promotion ACE Peshawar	DSP Special Branch
Mr. Noor Zamin Shah	On promotion FRP HQrs: Pesh:	DSP FRP HQrs: Peshawar
Mr. Khalid Khan	On promotion Special Branch	SDPO Sheikh Malfoor, Mardan
Mr. Muhammad Islam	On promotion Special Branch	SDPO Madyan, Swat
Mr. Zia Hassan	On promotion ACE Peshawar	DSP Invest: CCP Peshawar
Mr. Rafiullah	On promotion CCP Peshawar	SDPO Saidu Sharif Swat

Sd/-
NASIR KHAN DURRANI
Inspector General of Police
Khyber Pakhtunkhwa Peshawar

5009-21 /Supdt: (Est:-I), dated Peshawar the 19/02/2014.

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

1. Addl: IGP HQrs:, Special Branch Khyber Pakhtunkhwa Peshawar.
2. Addl: IGP/Commandant FRP Khyber Pakhtunkhwa Peshawar.
3. Capital City Police Officer Peshawar with the direction that Mr. Amir Shehzad DSP is on Ex-Pakistan leave, therefore, his pay may be drawn in leave salary.
4. RPO Malakand & Mardan Regions.
5. Accountant General Khyber Pakhtunkhwa Peshawar.
6. DPOs Mardan & Swat.
7. DAOs Mardan & Swat.
8. PSO to IGP Khyber Pakhtunkhwa Peshawar.
9. Supdt: Secret CPO Peshawar.
10. U.O.P file.

DL
(MUBARAK ZEB)
DIG HQrs:
For Inspector General of Police
Khyber Pakhtunkhwa Peshawar.

Attended
Sd/-
Rafiq
26/2/14

(9)

OFFICE OF

ORDER

20

On promotion as officiating Inspector, the following transferred/posting are hereby ordered with immediate effect and until further order.

Name	From	To
SI Bashir Khan No. B/25	District Bannu	Bannu Region
S Ijaz Ahmad No. H/3	Abbottabad District	Mardan Region
S Usman Ghani No. B/113	Lakki District	Bannu Region
S Muhammad Tahir No. B/24	Bannu Region	Attached with Kohat Region for the purpose of pay.
S Muhammad Nadeem No. D/2	D.I.Khan District	D.I.Khan Region
S Zia Hassan No. D/3	Special Branch NWFP	Anti Corruption NWFP

MUHAMMAD SHARIF VIRK
Provincial Police Officer,
NWFP, Peshawar.

No 19691-99 /E-II Dated Peshawar the 23/8 /2007.

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

- 1) Deputy Inspector General of Police Bannu Region Bannu.
- 2) Deputy Inspector General of Police Mardan Region-I, Mardan.
- 3) Deputy Inspector General of Police D.I.Khan Region D.I Khan
- 4) Deputy Inspector General of Police Hazara Region Abbottabad
- 5) Deputy Inspector General of Police Kohat Region Kohat.
- 6) Deputy Inspector General of Police Special Branch, NWFP Peshawar.
- 7) Director Anti Corruption NWFP, Peshawar.
- 8) Asstt. Secret CPO, Peshawar
- 9) U.O.P. File.

Attended
26/8

16

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

NOTIFICATION

Dated: 28 / 1 / 2010

NO 2739

7E-II CONFIRMATION AS INSPECTOR:

The following Offg. Inspectors on list "E" of NWFP Police are hereby confirmed as Inspector with immediate effect.

S/NO	RANK & NAMES
✓ 1.	Salah ud-Din No. D/6
✓ 2.	Hidayat Ullah No. D/5
✓ 3.	Arbab Khan No. D/30
4.	Riaz ul-Islam No. P/83
5.	Shoukat Ali No. MR/53
6.	Abdus Saimad No. MR/54
7.	Muhammad Saddique No. H/77
8.	Naveed Abbas No. P/61
✓ 9.	Abdul Hayee No. D/4
10.	Usman Ghani No. B/13
11.	Muhammad Talir Khan No. B/2
✓ 12.	Muhammad Nadeem No. D/2
→ ✓ 13.	Zia Hassan No. D/3

(ABDUL MAJEED KHAN MARWAT)
PSP

Add: ICP/Headquarters,
For Provincial Police Officer,
NWFP Peshawar.

No. 2740 - 6.9 /E-II Dated Peshawar the 28 / 1 / 2010.

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

1. Addl. Inspector General of Police, Investigation NWFP, Peshawar with 2 spare copies for publication in NWFP Gazette Part-II.
2. Capital City Police Officer Peshawar.
3. All RPOs in NWFP.
4. Office Supdt. Secret, CPO, Peshawar with 13 spare copies for placing in their Character Roll Dossier.
5. U.O.P File.

Attested
CPO
20/8

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DIKHAN

In SA NO. 688/2018

Syed Inayat Ali Shah

VERSUS

PPO(IGP) KPK, etc

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 3 (Nazir Khan)

INDEX


S.No	Particulars of the Documents	Annexure	Page
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2.	Copy of notification dated 08/01/2007		7
3.	Copy of notification dated 28/03/2007		8
4.	Copy of notification 21/05/2010		9
5.	Copies of notification dated 19/07/2013		10
6.	Wakalatnama	--	

Date :24/06/2019

Your humble respondents No. 3

DSP Nazir Khan MR/56

Through counsel:-


Muhammad Abdullah Baloch
Advocate High Court DIKhan.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DIKHAN

In SA NO. 688/2018

Syed Inayat Ali Shah

VERSUS

PPO(IGP) KPK, etc

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 3 (Nazir Khan)

Respectfully Sir;

Parawise comments on behalf of respondent No.3 are as under:-

PRELIMINARY OBJECTIONS

- a. That petitioner has got no cause of action and locus standi in the matter.
- b. That the appeal is not competent, as the controversy agitated therein is based on wrong interpretation of laws and rules.
- c. That the appeal has not been based on true facts, appeal is barred by law of limitation.
- d. That appellant is estopped by his own conduct to file the instant appeal.
- e. That seniority list 2014 was issued and challenged by the appellant through representation only and did not file service appeal in court. Thus, appellant is estopped to file instant appeal on the same ground.
- f. That appeal is bad for misjoinder and non-joinder of parties.
- g. That appellant has not approached this august forum with clean hands.

- h. That the relief claimed by the appellant is against Police rules.
- i. That seniority list is clear and according to Police rules.
- j. That the appellant was admitted to list 'F' later than the present answering respondent. Therefore, he was placed at proper serial number in accordance with admission to the said list and subsequently to proper place in seniority list of DSsP.

REPLY ON FACTS

1. Para No 1 is correct to the extent of induction of appellant in police department as Assistant Sub Inspector; rest of the para is incorrect, hence not admitted. The appellant has referred notification no. 1916 dated 20/02/2010 issued from the Office of DPO Dera Ismail Khan which allegedly pertains to date of confirmation of the appellant in the rank of Sub Inspector but has not annexed any copy thereof. The appellant has also referred notification no. 18414/E-II dated 30/07/2010 which is the date of inclusion of the appellant's name in list 'F'. The appellant has also not annexed and deliberately concealed judgment of the Service Tribunal dated 23/07/2009. In fact the matter before the Service Tribunal was the expunction of adverse remarks against the appellant and was not at all related to the date of confirmation of the appellant. Moreover, even if it was so, only the DPC would have been a proper authority to discuss the date of confirmation of the appellant in the light of judgment of Service Tribunal and confirmation order must have bearing the verdict of Worthy Service Tribunal. If it is so, then order of the confirmation of the appellant does not bear any force and against the law, rules and procedure. The answering respondent is senior to the appellant and was promoted to the rank of DSP prior to the appellant therefore.

the answering respondent rank senior to appellant. The answering respondent was promoted to rank of DSP (BS-17) on regular basis vide notification no. S/3814 dated 19/07/2013 whereas appellant was promoted on 24/01/2014.

2. Para no.2 related to the record needs no reply. However the answering was confirmed as Inspector vide notification no. 13329/E-II dated 21/05/2010 while appellant was confirmed as Inspector on 23/12/2011, much later to the answering respondent. Copies annexed.
3. Para no.3 is also related to the record. If appellant has challenged the seniority list of Deputy Superintendent of Police during the year 2014 through a representation but did not file any appeal in any competent court then the case of the appellant is hit by the doctrine of waiver, estoppel and acquiescence.
4. Para no.4 is incorrect, not admitted. Appellant's name was placed at due serial of the seniority list which was maintained in accordance with the rules and inclusion of the names in seniority list 'F' as per provision Police Rules, 1934, 13.15(iv). However seniority list of Dy; Superintendent of Police dated 19/03/2019 has also been issued wherein appellant is at serial no. 66 whereas the answering respondent is at serial no. 54.
5. Para no. 5 is incorrect, not admitted. The para is incorrect even in terms of true interpretation of Police Rules, 1934. Rule 13.15(iv), the seniority list 'F' for promotion to the rank of inspector will be in accordance with the date of entry to that list. The appellant was admitted to list 'F' on 30.07.2017, subsequent to the answering respondent as answering respondent was admitted to list 'F' on 20.12.2006. Therefore, he was placed at proper serial number of seniority in accordance with admission to that list and proper place in

6. Para no. 6 is incorrect hence, denied. Placement of appellant in the seniority list is not a clerical mistake rather his placement is very much according with the law and the rules. Private respondents no. 3 to 18(DSsP) are senior to appellant and all were also promoted to the rank of DSP prior to the appellant therefore, the private respondents including the answering respondent rank senior to the appellant. Police Rules, 1934 rule 13.15(iv), seniority list 'F' for promotion to the rank of inspector will be in accordance with the date of entry to that list. Appellant was promoted as officiating in the year 2010 whereas the answering respondent was promoted as officiating inspector in 2007. Therefore the appellant was placed in the seniority list of the DSsP in his due place in accordance with seniority.
7. Para no.7 is pertains to the record. However appellant has not filed the representation according to the law and rules.
8. Para no. 8 is incorrect. Appeal is not maintainable on the given grounds

GROUND-WISE REPLY

1. Incorrect. Notification of seniority of DSsP was issued in accordance with the rules and the appellant was placed at his correct place of seniority list under PR 13.15(iv), from the date of admission to the list 'F', date of officiating promotion to the rank of inspector, and promotion to the rank of DSP, hence notification is very much according to the law and rule.
2. Incorrect, seniority of appellant was fixed in accordance with PR and no discrimination or injustice has been done.

3. Incorrect, the notification was issued in accordance with rules and the name of the appellant and the answering respondent were placed at their own number according to the seniority hence, the notification is maintainable.
4. Incorrect, the seniority list 2017 was issued in accordance with the rules and appellant was placed at his correct serial number at the list so as the answering respondent as well. The seniority of DSsP is to be reckoned from the date of entry to the list 'F'. Moreover date of confirmation of appellant as Sub Inspector is also ambiguous as the appellant has not annexed the necessary record in this respect.
5. Incorrect, the appeal of the appellant is not supported by any law and rules.
6. Incorrect, the appellant has wrongly approached this Service Tribunal as the seniority has correctly been fixed.
7. The counsel for the answering respondent may also be allowed to raise additional grounds during the arguments.

It is therefore prayed that appeal of the appellant may please be dismissed with cost.

Date :24/06/2019

Your humble respondents No. 3

DSP Nazir Khan MR/56

Through counsel:


Muhammad Abdullah Baloch

Advocate High Court DIKhan.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP DIKHAN

In SA NO. 688/2018

Syed Inayat Ali Shah

VERSUS

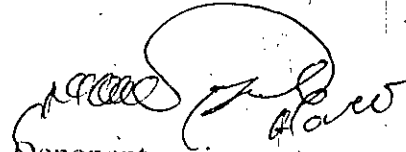
PPO(IGP) KPK, etc

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.
3 (Nazir Khan)

AFFIDAVIT

I, Muhammad Abdullah Baloch, counsel for answering respondents No. 3, as per instructions of my clients, do hereby solemnly affirm on oath that all contents of the parawise comments are true and correct to the best of my knowledge, belief and information as communicated to me; that nothing has been deliberately concealed or kept secret from this Honourable Tribunal.

24.06.2019


Deponent

(7)

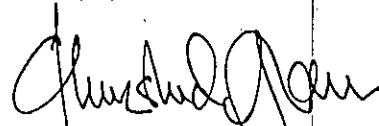
**FOR PUBLICATION IN THE NWFP POLICE GAZETTE PART-II, ORDERS BY
THE PROVINCIAL POLICE OFFICER NWFP PESHAWAR.**

NOTIFICATION

Dated: 21/1/2007.

No. 460 /E-II, **PROMOTION LIST-F** The names of the following confirmed Sub Inspectors of NWFP Police duly recommended by the DPC held on 20.12.2006 and approved by the Provincial Police Officer NWFP, Peshawar are hereby brought on promotion list F w.e.f 20.12.2006.

S/NO	NAME & NUMBER	HOME DISTRICT
1.	SI Hidayatullah No. D/5	DIKhan
2.	SI Iftikhar Shah MR/42	Mardan
3.	SI Arbab Khan No. D/30	DIKhan
4.	SI Shoukat Ali No. MR/53	Swabi
5.	SI Salah ud Din No. D/6	Tank
6.	SI Mushtaq Ahmad No. MR/52	Swabi
7.	SI Sajjad Ahmad No. MR/48	Swabi
8.	SI Fahir Iqbal No. H/63	Abbottabad
9.	SI Muhammad Javed No. H/73	Abbottabad
10.	SI Abdul Rashid No. MR/55	Lakki
11.	SI Muzammil Shah No. MR/51	Swabi
12.	SI Niaz Muhammad No. MR/13	Swabi
13.	SI Sahibzada Sajjad Ahmad No. MR/5	Swabi
14.	SI Momin Khan No. P/67	Charsadda
15.	SI Naveed Abas No. P/61	Kohat
16.	SI Nazir Khan No. MR/56	Mardan
17.	SI Abdul Hai No. D/1	DIKhan
18.	SI Amanullah No. P/71	Peshawar
19.	SI Ishfaq Ahmad No. MR/51	Swabi



(KHURSHID ALAM KHAN)

Addl: IGP/HQRs

For Provincial Police Officer,
NWFP, Peshawar.

No. 461-90 /E-II

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

1. All Heads of Police Offices in NWFP.
2. Assistant Secret CPO with 19 spare copies for placing in their Character Rolls.
3. U.O.P File

*Attes feel to be
true copy
please print*

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

NOTIFICATION

Dated: 28/3/2007. (8)

No. 6497

/E-II, PROMOTION AS OFFG: INSPECTORS:-

Sub Inspector Nazir Khan No. MR/56 of Mardan Region has been approved in the DPC held on 15.03.2007 for promotion to the rank of Offg: Inspectors BPS-16 (4375-340-14575) with his colleagues.

His promotion will take effect from the date, he actually taking his higher responsibilities.

Necessary Gazette Notification may please be issued accordingly.

His posting order will be issued separately.

Khurshid Alam Khan
(KHURSHID ALAM KHAN)
Add: IGP/HQRs
For Provincial Police Officer,
NWFP, Peshawar.

No. 6498-99 /E-II

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

1. Deputy Inspector General of Police Mardan Region.
2. Assistant Secret CPO alongwith spare copy for placing in his original Character Roll.
3. U.O.P. File

*Approved
Copy
Returned*

9

**FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE
GAZETTE PART-II, ORDERS BY THE PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA,**

NOTIFICATION

Dated: 27/1/2010

No. 13329 /E-II, CONFIRMATION AS INSPECTOR:

In continuation of this office Notification No. 2739-49/E-II dated: 28.01.2010 and No: 7204-14/E-II dated 08.03.2010.

The following Offg: Inspectors on list "F" of Khyber Pakhtunkhwa, Police are hereby confirmed as Inspector with their colleagues.

S/NO	RANK & NAMES
1.	Inspector Tahir Iqbal No. H/63
2.	Inspector Shah Hassan No. MR/49
3.	Inspector Sahibzada Sajjad No. MR/50
4.	Inspector Nazir Khan No. MR/56

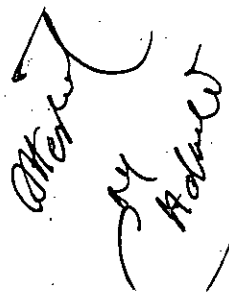

(ABDUL MAJEED KHAN MARWAT)
PSP

Addl: IGP/Headquarters,
For Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar.

No. 13330-40 /E-II, Dated Peshawar the 27/1 /2010.

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

1. Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar with 2 spare copies for publication in Khyber Pakhtunkhwa, Gazette Part-II.
2. Capital City Police Officer Peshawar.
3. All RPOs in Khyber Pakhtunkhwa.
4. Office Supdt: Secret, CPO, Peshawar with 4 spare copies for placing in their Character Roll Dossier.
5. U.O.P File.



(10)

**OFFICE OF THE
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA, PESHAWAR.**

Dated Peshawar, the 19/07 2013.

NOTIFICATION

No. S/ 3814 /13. In pursuance of the provisions contained in Section-5 of the Khyber Pakhtunkhwa (Promotion of Superintendent of Police and Deputy Superintendent of Police) Rules-2007, the Competent Authority i.e Provincial Police Officer on recommendations of the Departmental Selection Committee meeting held on 16.07.2013 is pleased to promote the following Inspectors (BS-16) to the rank of Deputy Superintendent of Police (BS-17) on regular basis with immediate effect.

2. The officers on promotion shall remain on probation for a period of one year in terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

Their promotion will take effect from the date they actually assume the charge of higher responsibility:-

S. No.	Name and No.
1.	Inspector Naveed Abbas, P/61
✓2.	Inspector Nazir Khan, MR/56
3.	Inspector Abdul Hye, D/1
4.	Inspector Muhammad Tahir Khan, B/24
5.	Inspector Saleem Amanullah, P/71

Sd/-

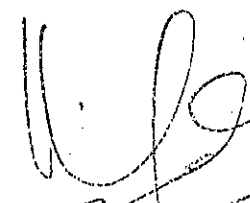
(IHSAN GHANI)

Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. S/ 3815-45 /13, dated Peshawar, the 19/07 /2013.

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

1. Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Govt: Khyber Pakhtunkhwa, E & AD Deptt: Peshawar.
5. Secretary Govt: Khyber Pakhtunkhwa, Finance Deptt: Peshawar.
6. Secretary Govt: Khyber Pakhtunkhwa, Home & T.As Deptt: Peshawar.
7. Accountant General, Khyber Pakhtunkhwa, Peshawar.
8. Addl: IGP/HQrs., Khyber Pakhtunkhwa, Peshawar.
9. Addl: IGP/Operations, Khyber Pakhtunkhwa, Peshawar.
10. Addl: IGP/Special Branch, Khyber Pakhtunkhwa, Peshawar.
11. Addl: IGP/Investigation, Khyber Pakhtunkhwa, Peshawar.
12. Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
13. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
14. Commandant, PTC, Hangu.
15. Director General, FIA, Islamabad.
16. Capital City Police Officer, Peshawar.
17. All Region D.Is.G. of Police in Khyber Pakhtunkhwa.
18. A.Is.G. of Police, Traffic & Telecommunication, Khyber Pakhtunkhwa.
19. Director, FIA, Peshawar Zone, Peshawar.
20. Officer concerned.
21. Registrar, CPO, Peshawar.
22. Supdt: "E" Branch, CPO.
23. Manager Govt: Printing Press, KPK, Peshawar.
24. U.O.P. Files.
25. Office Copy.


(KHALID MASOOD)

Addl: IGP/HQrs:
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

*Attended
by
Admiral*

for Appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.991/2018

Date of Institution: 10.08.2018

Date of Decision: 17.12.2020



Abdul Hai Khan Deputy Superintendent of Police, Presently posted as Assistant Director (Crime), Anti corruption Establishment at D.I. Khan.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Home Secretary and 27 others.

(Respondents)

Muhammad Abdullah Baloch
Advocate

For Appellant

Mr. Muhammad Jan
Deputy District Attorney

For Official Respondents

Mrs. ROZINA REHMAN

...

MEMBER (J)

Mr. ATIQ UR REHMAN WAZIR

...

MEMBER (E)

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

JUDGMENT: -

Mr. ATIQ UR REHMAN WAZIR: - Appellant Mr. Abdul Hai Khan, was initially appointed as Assistant Sub Inspector (BPS-9) in Provincial Police on the recommendations of Khyber Pakhtunkhwa Public Service Commission on 01.02.1995 and was placed at top of the merit list; that in due course of time, the appellant was promoted to the post of DSP; that departmental final seniority list of DSPs was issued on 22.03.2018, wherein the appellant was placed much junior to his colleagues, who all were junior to him in the initial seniority list assigned by Public Service Commission; that he is also placed junior to those inducted in service much later than the appellant. The appellant filed

departmental appeal on 19.04.2018, but of no avail, hence the instant appeal with prayers that seniority list dated 22.03.2018 may be set aside and seniority of the appellant may be placed at Serial No. 30 i.e. above Mr. Tauheed Khan in accordance with seniority rules as envisaged in Esta Code and Civil Service Regulations.

2. Written reply/comments were submitted by respondents.

3. Arguments heard and record perused.

4. Learned counsel for the appellant contended that the appellant was initially appointed as ASI on 01.02.1995 on the recommendations of Khyber Pakhtunkhwa Public Service Commission and was placed at the top of the seniority list. Learned counsel for the appellant further contended that during the course, the appellant was promoted to the rank of DSP and as per impugned final seniority list issued on 22.03.2018, the appellant is placed at Serial No. 67 below the name of Mr. Nazir Khan and above Mr. Muhammad Tahir, while the officers junior to him have been placed at Serial No. 30, which for all intent and purposes is erroneous and wrongly placed. The learned counsel for the appellant argued that in view of Rule 17 (1) (a) of the Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the seniority inter se of civil servants shall be determined in case of persons appointed by initial recruitment, in accordance with merit assigned by Commission. Learned counsel for the appellant contended that the impugned seniority list is based on error and an outcome of improper reckoning due to misreading of record to the effect that those inducted in service much later than the appellant i.e. Nazir Ahmad, Saeed Akhtar, Muhammad Ayaz and Muhammad Jamil are placed at Serial No. 48 to 51 of the said list much above the appellant. He further added that as per Rule 17 (a) of Khyber

ATTESTED

EXAMINER
Khyber-Pakhtunkhwa
Service Tribunal

Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules, 1989, seniority in various cadres of the civil servants appointed by initial recruitment vis-à-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre. Section 8 (4) of the Civil Servants Act, 1973 also provides that seniority in a post, service or cadre to which a civil servant is promoted shall take effect from the date of regular (initial) appointment. Learned counsel for the appellant argued that the appellant is entitled for equal treatment as per article 25 of the Constitution and his seniority need to be considered from the merit list of the Public Service Commission. Learned counsel for the appellant referred to the judgments of this Tribunal in Service Appeal No. 79/2019, Service Appeal No. 736/2016, Service Appeal No. 162/2014 and Service Appeal No. 1227/2013, where in similar nature cases, relief has already been granted by this tribunal. Learned counsel for the appellant also referred to the judgments of Supreme Court of Pakistan in 2016 SCMR 1254 and 2002 PLC (CS) 1388. On question of limitation the learned counsel referred to the judgment of supreme court of Pakistan in 2002 PLC (CS) 1388 and 2009 PLC (CS) 178, where on the issue of promotion, pay and other emoluments, limitation would not foreclose his right accrued to him. Learned counsel for the appellant prayed that in view of the situation, the impugned seniority list dated 22.03.2018 may be set aside and the respondents may be directed to place the name of the appellant at Serial No. 30 above Mr. Tauheed Khan in accordance with seniority rules to meet the end of justice with all consequential benefits of service.

5. The learned Deputy District Attorney appeared on behalf of official respondents stated at bar that seniority issue of the appellant was discussed in meeting of a committee constituted for the purpose on 29.11.2018 and it was

ATTESTED

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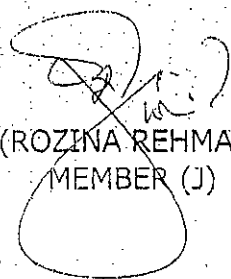
observed that the appellant was confirmed as Sub Inspector on 19.05.2006 and his name was brought on list F on 20.12.2006, whereas his juniors were confirmed as SI on 07.04.2003 and brought their names on list F earlier to the appellant i.e. 16-12-2005. The committee noted that his seniority was disturbed due to late confirmation in the rank of sub inspector. Since the list of promotion/confirmation of officers in the rank of ASIs and SIs are dealt with in the regions, therefore the committee recommended that his case may be sent to Regional Police Officer (RPO) D.I. Khan to revisit his seniority in the light of rules and fact mentioned in his application. Accordingly, his case was examined at the level of RPO D.I. Khan and it was observed that appellant was at Serial No. 1 of the seniority list after his induction in service as ASI on 01.02.1995, but his name was placed at Serial No. 4 instead of Serial No. 1 without any reason mentioned in the confirmation order and their names were brought on list E w.e.f. 25.04.1998 in which the name of Mr. Tauheed Khan at Serial No. 8 was placed on top of the list. Learned Deputy District Attorney contended that the RPO office was not sure as to why his name was brought to Serial No. 4 instead of Serial No. 1, as there was no adverse action taken against the appellant nor any other reason assigned. One of the probable reasons mentioned was that it might be due to age.

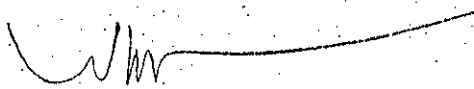
6. We are conscious of the fact that time limitation needs to be kept in mind, but in the light of judgments of Supreme Court of Pakistan referred to above and in view of provisions of S.23 of Limitation Act 1908, the appellant has a continuous cause of action and issuance of seniority list at belated stage by respondents created a fresh cause of action for the appellant, not knowing the fact that his late confirmation in 2006 would entail seniority issue at a later stage. In order to ascertain the actual situation, representative of RPO D.I. Khan

was summoned by Court, who stated at bar that there was nothing adverse against the appellant during the time, but the change in seniority might be due to clerical mistake, which travelled along the seniority of the appellant and culminated into the final seniority list issued in 2018. We also did not find anything adverse on record except his late confirmation due to unknown reasons. It is also established from the prevailing rules that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post. Moreover this tribunal as well as Supreme Court of Pakistan in number of Judgments have granted relief in similar cases.

7. In the light of facts and circumstances of the present case, the impugned seniority list dated 22-03-2018 is set aside and the instant appeal is accepted as prayed for. No orders as to costs. File be consigned to the record room.

ANNOUNCED
17.12.2020


(ROZINA REHMAN)
MEMBER (J)


(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 17/12/2020
Number of Marks 2000
Copies 22-02
Urgent 0-00
Total 22-02
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Date of Delivery of Copy 23/12/2020