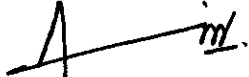


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1421/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/06/2023	<p>The appeal of Mr. Zubair Shah presented today by Mr. Baseer Ahmad Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

Service Appeal No. 1421 /2023

Zubair Shah..... Appellant

**V E R S U S**

CCP & others..... Respondents

**I N D E X**

S. No	Description of Documents	Annexure	Pages
1.	Service appeal with Affidavit		1-3
2.	Application for interim relief with Affidavit		4
3.	Copy of Order dated 10-09-2011	A	5
4.	Copy of LPC	B	6-8
5.	Copy of departmental appeal & letters	C & D	9-17
6.	Vakalat Nama		18

Dated:-27-06-2023

Through

  
Appellant

  
Baseer Ahmad Shah  
&

  
Ibad Khan Khalil  
Advocates, Peshawar

**OFFICE:-** Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0317-6260691  
**Email:-**

1

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

Service Appeal No. 1421 /2023

Zubair Shah, Driver Constable No 483, Capital City Police, Peshawar.  
.....Appellant

**V E R S U S**

1. Capital City Police Officer, Peshawar.
2. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
3. District Police Officer Charsadda.
4. District Police Officer Nowshera.

.....Respondents

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE NON POSTING/NON ADJUSTMENT OF THE APPELLANT AGAINST HIS POST AND NON RELEASE OF SALARIES OF THE APPELLANT W.E.F 01-09-2011 TILL DATE FOR WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE LAPSE OF MORE THAN THE THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:-**

On acceptance of this appeal, the respondents may kindly be directed to adjust/post the appellant against the vacant post of Constable Driver and to release his salaries w.e.f. 01-09-2011 till date and onwards.

**Respectfully Submitted:-**

1. That the appellant was initially enlisted as Constable on 01-07-1990, and was since then performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That after serving for about eighteen years, the appellant was transferred to District Charsadda where he performed his duties diligently and his services were then surrendered to Peshawar District by respondent No 3 vide Order dated 10-09-2011, however due to illness the appellant could not reported arrival within the stipulated period and after recovery reported arrival in Peshawar Police on 28-09-2011 however arrival was denied to him on the ground that his service roll has been sent to

Charsadda Police. **(Copy of Order dated 10-09-2011 is enclosed as Annexure A).**

3. That the appellant accordingly reported arrival in District Police Charsadda but there too he was not allowed arrival and was told that his service record has been sent to Peshawar Police, the appellant there after time and again approached respondents for allowing him to duty and release of salaries but with no fruit till date. **(Copy of LPC is enclosed as enclosed as Annexure B).**
4. That since then the salary of the appellant has been stopped without assigning any reason, and he is not allowed arrival, the appellant time and again approached respondents for his arrival/adjustment against his post but to no avail. Finally, the appellant approached respondents for his adjustment/arrival and release of salaries vide departmental appeal dated 17-06-2020 which was processed but has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of departmental appeal & Letters are enclosed as Annexure C & D).**
5. That the inactions, omissions and commissions of respondents of not allowing him arrival/posting and releasing his salaries, is against the law, facts and principles of justice on grounds inter-alia as follows:-

**G R O U N D S :-**

- A. That the omissions and commissions of respondents are illegal, unlawful, without lawful authority and of no legal effect.
- B. That mandatory provisions of law and rules have badly been violated by the respondents and the appellant is not been treated according to law and rules.
- C. That the service of the appellant is still intact, therefore he is entitled to be adjusted/posted against his post and his salaries released forth with. Even law and rules are very much clear on the point.
- D. That the appellant being in service is entitled to posting/adjustment and release of salaries as well.

3

- E.** That the appellant since 1990 is in service thus having long service with unblemished service record with no complaint during his entire service career.
- F.** That there is no omission or commission on part of the appellant and he could not be punished for the fault of others if any.
- G.** That as per Section 17 of the Civil Servants Act, 1973, the appellant is entitled to the pay of his post.
- H.** That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

**It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.**

**Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.**

Dated:-27-06-2023

Through

Appellant  
Baseer Ahmad Shah  
&  
Ibad Khan Khalil  
Advocates, Peshawar

**LIST OF BOOKS**

1. Constitution 1973.
2. other books as per need

**CERTIFICATE:**

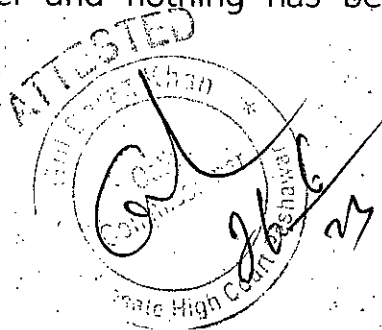
Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

ADVOCATE

**AFFIDAVIT**

I, Zubair Shah, Driver Constable No 483, Capital City Police, Peshawar, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

DEPONENT



(4)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

Service Appeal No. \_\_\_\_\_/2023

Zubair Shah.....Petitioner/Appellant

**V E R S U S**

CCP & others.....Respondents

**APPLICATION FOR RESTRAINING RESPONDENTS FROM TAKING ANY  
ADVERSE ACTION AGAINST THE APPELLANT, TILL THE FINAL  
DISPOSAL OF TITLED CASE.**

**Respectfully submitted:-**

1. That the above titled Service Appeal is being filed today before this honorable Tribunal wherein no date of hearing has been fixed so far.
2. That the grounds of appeal may kindly be considered as integral part of this application.
3. That the appellant is still in service and respondents are going to take adverse action against the appellant in violation of law and rules on the subject.
4. That the applicant is having a good prima facie case in his favor and is sanguine of its success.
5. That the balance of convenience is also in favor of the applicant.
6. That if respondents are not restrained from taking adverse action the appellant, he would suffer irreparable loss.

**It is therefore prayed, that on acceptance of this application, the respondents may kindly be restrained from taking any adverse action against the appellant, till the final disposal of titled case.**

Dated:-27-06-2023

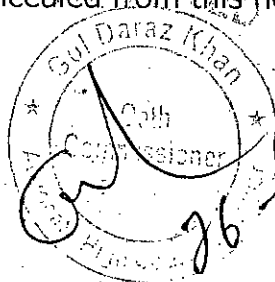
Through

*[Signature]*  
Appellant

Baseer Ahamd Shah  
&  
Ibad Khan Khalil  
Advocates, Peshawar

**AFFIDAVIT**

I, Zubair Shah, Driver Constable No 483, Capital City Police, Peshawar, do hereby solemnly affirm and declare on oath that the contents of this **Application**, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



*[Signature]*  
**DEPONENT**

5

Anex. A

ORDER

Constable Driver Zubair Shah No. 229 is hereby surrendered to Peshawar District with immediate effect. His services are no more require to this District Police.

*[Signature]*  
District Police Officer,  
Charsadda.

No. 4681 /OASI, dated Charsadda the 10/9 2011.

Copy forwarded for information to:

1. Capital City Police Officer, Peshawar.
2. DSP HQrs; Charsadda.
3. EC/OASI

*[Signature]*  
**ATTESTED**  
TO BE TRUE COPY

5

**ORDER**

Constable Driver Zubair Shah No. 229 is hereby surrendered to Peshawar District with immediate effect. His services are no more require to this District police.

Sd/-  
District Police Officer  
Charsadda

No.4681/OASI, dated Charsadda the 10/9/2011

Copy forwarded for information to

1. Capital City police Officer, Peshawar.
2. DSP HQrs: Charsadda.
3. Executing Court/OASI.

*[Signature]*  
**ATTESTED**  
TO BE TRUE COPY



# LAST PAY CERTIFICATE

Form 137529 - Dubay Slah 137529  
 Anct B

1. Last Pay Certificate of H.C. Dubay Slah No.  
 of the Dial Postice of Sidda  
 proceeding to T. P. CCP Postwar

**DUPLICATE** (6)

2. He has been paid upto 31-08-2011  
 as the following rates:-

Particulars	Rate
0001 B.P.A	10,600
1000 H.R.A	1,059
1300 M.A	1,000
1567 W.A	100
1646 C.R.A	300
1770 S.C.A	1150
1830 S.R.A	
1831 A.R. (2005)	
1864 D.A	
1901 Risk All	5285
1902 Spl. Incentive	775
1908 A.R. 2009	
<b>Total Rs.</b>	

Particulars:  
 Official Pay: \_\_\_\_\_  
 Exchange Compensation Allowance: \_\_\_\_\_

Deductions:-  
 1. P.F. Rs. 500/-  
 2. Add. Group In. 77  
 3. G.O.P. In. 67

3. He made over charge of the Office of his  
delg.  
 on the A noon of \_\_\_\_\_

*[Signature]*  
**ATTEST**  
 TO RF

4. Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

5. He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

From \_\_\_\_\_ to \_\_\_\_\_ at Rs. \_\_\_\_\_ a month  
 From \_\_\_\_\_ to \_\_\_\_\_ at Rs. \_\_\_\_\_ a month  
 From \_\_\_\_\_ to \_\_\_\_\_ at Rs. \_\_\_\_\_ a month

6. He is entitled to draw the following amount Charbada  
 He is also entitled to joining time for 30 days

8. The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

NAME: ZUBER SHAH NO 483

MAN NO 4001370

DESIGNATION: CONSTABLE

HEAD OF A/C 22200056/2233

FUND TYPE: GS-GENERAL PROV FUND (POL)

ID-CARD:-

FUND-A/C NO 4POL NSR0000031

D. D. O: S.P. NOWSHERA

PAYROLL MONTH	MONTHLY SUBS.	REFUND GP-ADV.	INTERSET GP-ADV.	TOTAL DRAWLS	PROGRESSIVE BALANCE
OPENING BALANCE					513.00
JULY	50.00				563.00
AUGUST	50.00				613.00
SEPTEMBER	50.00				663.00
OCTOBER	50.00				713.00
NOVEMBER	50.00				763.00
DECEMBER	50.00				813.00
JANUARY	50.00				863.00
FEBRUARY	50.00				913.00
MARCH	50.00				963.00
APRIL	50.00				1013.00
MAY	50.00				1063.00
JUNE	50.00				1113.00
Total					600.00
OPENING BALANCE					12056.00
TOTAL DEPOSITS					513.00
INTEREST 15.93%					600.00
30% BONUS ON INTEREST					133.00
TOTAL					40.00
WIDHRWALS					1206.00
CLOSING BALANCE					12866.00

## ہدایات

- 1 براہ کرم اس کو نہایت احتیاط سے سنبھال کر رکھیں۔
- 2 اگر اس سٹیٹمنٹ کے مندرجات سے آپ متعلق نہ ہوں تو متعلقہ اکاؤنٹس آفیسر/اسسٹنٹ اکاؤنٹنٹ جنرل فنڈز سے رابطہ قائم کریں۔
- 3 شکایت دور نہ ہونے کی صورت میں ڈپٹی اکاؤنٹنٹ جنرل فنڈز سے رابطہ قائم کریں۔
- 4 اعتراضات اس اسٹیٹمنٹ کی تاریخ اجراء سے تین ماہ تک وصول کیے جاتے ہیں۔
- 5 اگر اس دوران کوئی اعتراض وصول نہ ہوا تو اس کے مندرجات کو درست سمجھا جائے گا۔
- 6 خط و کتابت کرتے وقت اپنا پرسنل نمبر لکھنا چاہیے۔ ڈپٹی اکاؤنٹنٹ نمبر کا حوالہ ہو کہ اس سلیپ میں درج ہے۔

13/09/92

تاریخ

اکاؤنٹس آفیسر

TESTED  
TO BE TRUE COPY

8

ATTENDED  
TO BE TRUE COPY

PAGE NO: 740  
 DECEMBER 2003

DOB: 000000000000 N. I. CARD:  
 TOBER, SHAH MD 483 S. P. NEWSHERA  
 CONSTABLE PROVINCIAL POLICE  
 02233 1056

729 94 001370  
 105 M

PAYMENTS

001 B PAY	100.00
1037 H ALL	100.00
1125 NEI ALL	100.00
1147 RATHN ALL	100.00
1133 SPL ADD ME	100.00
1139 15X 3	170.00
TOTAL ***	570.00

DEDUCTIONS/RECOVERIES

001 B PAY	100.00
1037 H ALL	100.00
1125 NEI ALL	100.00
1147 RATHN ALL	100.00
1133 SPL ADD ME	100.00
1139 15X 3	170.00
TOTAL ***	570.00

DEBIT BY SPECIAL AGENT

PD02MS00001 44092.00 00.00

TOTAL \*\*\* 82.00

D. C. ENT. 01071990 DOA-01071590

CASH PAYMENT THRU BANK

13 06

Anex C

## عزت مآب جناب آئی جی پی صاحب خیبر پختونخواہ

(9)

جناب عالی!

نوازش ہے کہ سائل 01/07/1990 نو شہرہ میں کنسٹیبل بھرتی ہوا تھا۔ سائل نے 18 سال نوکری نہایت خوش اسلوبی اور ایمانداری سے انجام دیکر بعد میں کچھ مجبوری کے بناء پر اپنا تبادلہ ضلع چارسدہ کو اپنی مرضی سے کرایا۔ اور پھر سائل کا تبادلہ ضلع چارسدہ سے پشاور کو افسران بالانے کرا کے سائل اسی وقت بیمار تھا۔ سائل نے 2011 میں اپنی وقت پر پشاور میں خاضری نہیں کی۔ اور بعد بیماری سے سے ٹھیک ہونے پر سائل جب پشاور پولیس لائن آ کر خاضری لگانے کے لئے تو پشاور میں سائل کا سروس رول اور آرڈر موجود نہیں تھا۔ دفتر ہذا والا نے بتایا کہ آپکا کاغذات یعنی سروس رول وغیرہ ہم نے چارسدہ کو واپس ارسال کیا ہے جب ہم نے چارسدہ والے سے معلومات کر کے تو چارسدہ والے نے بتایا کہ آپکا کاغذات ہمارے پاس نہیں ہے۔ آپکا کاغذات پشاور میں ہے۔ تو میں کس سے اپنی کاغذات کے بارے میں پوچھو نہ کوئی دفتر والا دیکھتا ہے تو اسی چکر یعنی کاغذات اور خاضری کرانے کے چکر میں 8 سال دفاتروں کا چکر لگاتا ہوں اور نہ ہی سروس رول اور آرڈر کے بغیر میرا خاضری بھی نہیں کراتے ہیں۔

جناب عالی! پشاور ڈسٹرکٹ والے کو میز خاضری اور بلٹ نمبر دینے کے لئے احکامات جاری فرما کر اور میرا سروس رول کے بارے میں جانچ پڑتال کر کے تاکہ میں اپنا خاضری کرا لوں اور میرے تنخواہ بھی بند ہے سائل کے چھوٹے چھوٹے بچے ہیں دعا گو ہے گا۔ سائل بدوران ڈیوٹی 21 لہال نوکری کرائی ہے۔

اس لئے آپ صاحبان مہربانی کر کے سائل اب ڈیوٹی کرانا چاہتا ہے۔ سائل کو اور دفاتروں والوں کو میرا خاضری کرانے کے احکامات جاری فرما کر تاکہ سائل اپنا نوکری پورا کریں۔

درخواست کے ساتھ سائل کا آرڈر ٹرانسفر اور سروس رول چارسدہ اور پشاور کے آنے جانے کے ڈاگ یعنی نوٹوشیٹ بھی ہمراہ لف ہے۔ بندہ تاحیات آپکو دعا گو ہے گا۔

ATTESTED  
TO BE TRUE COPY

العارض

آپکا تبادلہ ڈیوٹی اور سروس رول کا کنسٹیبل زیر شاہ نو شہرہ بیلٹ نمبر: 483 چارسدہ بیلٹ نمبر: 229 پشاور بیلٹ نمبر: Nill

No. 1325/2020

dt: 17/6/2020

Alkhalaf  
17/6/20



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

10

1000  
30/6/2020 30/6/2020

Reg No, 2401-PA V CRC  
30/6/2020 And D

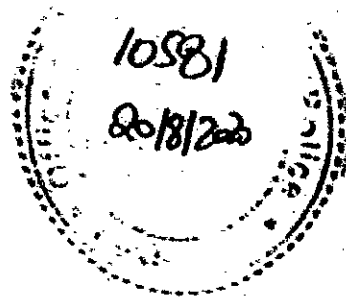
No. 947-18/E-IV dated Peshawar 18/8/2020

To ✓ The Capital City Police Officer,  
Peshawar.

The District Police Officer,  
Charsadda.

Subject: APPLICATION.

Memo:



3431  
24/8/2020

Please refer to this office Endst: No.7220-21/E-IV, dated: 29.06.2020 on the subject noted above.

The Competent Authority has directed to provide the detail posting record of Constable Zubair Shah No. 229 to proceed further in the matter.

TESTED  
TO BE IN THE...

*(Signature)*  
(SYED ANIS-UL-HASSAN)  
Registrar  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

- V.C.C.P.O. \_\_\_\_\_
- SSP/O \_\_\_\_\_
- SSP/A \_\_\_\_\_
- SP/Cantt \_\_\_\_\_
- SP/City \_\_\_\_\_
- SP/Rural \_\_\_\_\_
- SP/Sec. \_\_\_\_\_
- SP/HQ \_\_\_\_\_ ✓
- SP/T.O \_\_\_\_\_
- SP/T. HQ \_\_\_\_\_
- DSP/LOS \_\_\_\_\_
- P.O./C.C. \_\_\_\_\_
- PA/EC-II \_\_\_\_\_
- AS/C.Cell \_\_\_\_\_

20/8/20

*(Large handwritten signature)*  
OSI  
MS  
24/8/20





12

**OFFICE OF THE  
CAPITAL CITY POLICE OFFICER  
PESHAWAR**

Phone No. 001-0210041

Fax: No. 001-0212697

Email: ccbbranchccppeshawar@gmail.com

No. 14361

/CRC, dated Peshawar 14.9.2020

To The Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

Subject: **APPLICATION.**

Memo:

Sir,

Kindly refer to your office Memo No.9467-68/E-IV, dated 18.08.2020 & letter No.7220-21/E-IV, dated 29.06.2020 on the subject cited above.

In this connection, it is submitted that Constable Zubair Shah No.229 is not on the strength of CCP Peshawar and constabulary No.229 is allotted to Constable Sabir Khan.

**SP/HQrs:**

For Capital City Police Officer,  
Peshawar

*de*  
16/09

*9/16/09*  
**ATTESTED**  
TO BE TRUE COPY



28855/EN (13)

OFFICE OF THE  
DISTRICT POLICE OFFICER, CHARSADDA  
Phone# 091-9220400 fax# 091-6514661  
EMAIL [charsaddadpo@yahoo.com](mailto:charsaddadpo@yahoo.com)

No. 1075/EC dated Charsadda the 07/07/2020

To, The Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

Subject: - APPLICATION  
Memo:

Kindly refer to your office Endst: # 7220-21/E-IV, dated 29.06.2020.

1. It is submitted that applicant Constable Zubair Shah No: 229 was transferred on complaint to CCP/Peshawar vide this office order Endst: # 4681/OASI, dated 10.09.2011. His LPC was supplied to CCP/Peshawar vide this office # 4792/Acctt: dated 21.09.2011 whereas, his service documents i.e. Service Roll & Fuaji Missal were also sent to CCP Peshawar vide this office letter # 4851/EC dated 26.09.2011. The service record and LPC of above named official were received by CCP/Peshawar and not returned to this office.

2. As far as the attached copy of DAK book showing return of service documents to this office is concerned, the same is dubious and the record needs physical verification. The Dak Book and relevant dispatch register would clarify the numbers as to whether it is dispatch or diary number. Furthermore, 06 months back, the applicant visited this office in connection of his service record thus copies of transfer order & service record letter were provided on request which are affixed by applicant alongwith endorsement under reference.

3. Submitted, please.

Encl: (3)

MUHAMMAD SHOAB KHAN (PSP)  
District Police Officer  
Charsadda

ALLY BASH  
C/O  
C/O

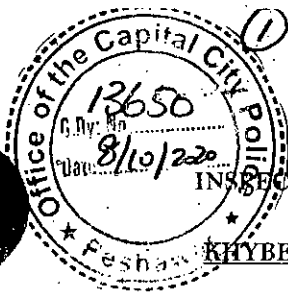
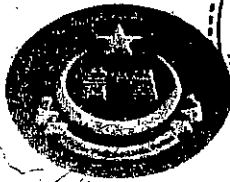
EA-IV  
For M. A. Khan Phuse  
2/7/2020

5336  
10/07/20

ATTESTED  
TO BE TRUE COPY

1-19/20





14

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

No. 11731-32 /E-IV dated Peshawar 6/10/2020

To : The Capital City Police Officer,  
Peshawar,

Subject: APPLICATION

Memo:

Please refer to your office Memo No. 14361/CRC dated: 14.09.2020 on the subject noted above.

Constable Zubair Shah No. 229 was transferred from District Police Charsadda to CCP, Peshawar on complaint basis vide DPO/Charsadda order Endst: No. 4681/OASI, dated: 10.09.2011. His LPC & Service Record (Service Roll & Fauji Missal) were sent to CCP, Peshawar by DPO/Charsadda vide letter No. 4792/Acctt: dated: 21.09.2011 & 4851/EC, dated: 26.09.2011 respectively.

It is crystal clear that Constabulary No. 229 was allotted to said Constable by DPO/Charsadda & on transfer it may also be changed.

Your reply is not the solution of the case & leads to dubious in the matter.

Please rectify the following points according to DPO/Charsadda letter No. 1075/EC, dated: 07.07.2020 (photocopy attached).

1. Any correspondence relating to transfer of the said official if made by your office with DPO/Charsadda & also provide detail of posting record since-2011 of the said belt No.
2. The verification may please be carried out from AG Office Khyber Pakhtunkhwa/Account Branch that as to whether applicant is still drawing his pay from your office or otherwise.
3. Being transferred from District Police Charsadda to CCP, Peshawar on complaint basis and not for submitting the arrival report why the departmental action has not been initiated against the delinquent so far official till now.

DPO \_\_\_\_\_  
 SSP/O \_\_\_\_\_  
 SSP/M \_\_\_\_\_  
 SP/Cantt \_\_\_\_\_  
 SP/City \_\_\_\_\_  
 SP/Rural \_\_\_\_\_  
 SP/Sec \_\_\_\_\_  
 SP/HQ \_\_\_\_\_  
 SP/T.O \_\_\_\_\_  
 SP/T. HQ \_\_\_\_\_  
 DSP/L/O \_\_\_\_\_  
 P.O./C.C. \_\_\_\_\_  
 P.A./EC-II \_\_\_\_\_  
 J.C.C. \_\_\_\_\_  
 C.I. \_\_\_\_\_

No. \_\_\_\_\_ /E-IV dated Peshawar the \_\_\_\_\_

(KASHIF ZULFIQAR) PSP  
AIG/Establishment  
for Inspector General of Police,  
Khyber Pakhtunkhwa.

ATTESTED  
TO BE TRUE COPY

Copy of above is forwarded to DPO/Charsadda for information and similar

necessary action w/r to his office letter No. 1075/EC, dated: 07.07.2020.

DY/HQ 10050 EKE  
8-10-2020 8/10/2020

15

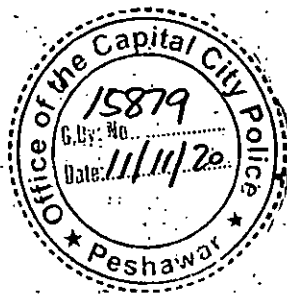


OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA,  
Central Police Officer,  
Peshawar.

No. 13242-43 /E-IV, dated Peshawar, the 06/11/2020

To: The Capital City Police Officer,  
Peshawar.

The District Police Officer,  
Charsadda.



Subject: APPLICATION

Memo.

Please refer to this office Endst: No. 11731-32/E-IV, dated: 06.10.2020 on the subject noted above.

The desired reply / report is still awaited which may please be expedited at the

earliest.

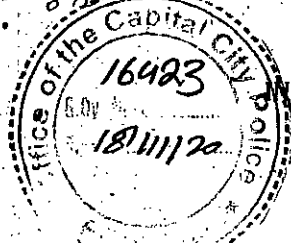
- C.C.P.O.
- SSP/O
- SSP/
- SP/Cantt
- SP/City
- SP/Rural
- SP/Sec
- SP/HQ
- SP/T.O
- SP/T. HQ
- DSP/LOS
- P.O./C.C.
- PA/EC-II
- AS./C.Cell

CRC 11/11/20

(SYED ANIS-UL-HASSAN)  
Registrar  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.  
05.11.2020

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TO BE TRUE COPY

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Put up with  
  
12/11



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

16

No. 13735 /E-IV, dated Peshawar, the 16/11/2020

To : The Capital City Police Officer,  
Peshawar.

Subject: APPLICATION

Memo.

Please refer to this office Endst: Nos. 11731-32/E-IV, dated: 06.10.2020 & No. 13242-43/E-IV, dated 06.11.2020 on the subject noted above.

The desired reply / report is still awaited which may please be expedited at the earliest.

- CC/DO \_\_\_\_\_
- SSP \_\_\_\_\_
- SSP/T \_\_\_\_\_
- SP/Cantt \_\_\_\_\_
- SP/City \_\_\_\_\_
- SP/Rural \_\_\_\_\_
- SP/Sec \_\_\_\_\_
- SP/HQ \_\_\_\_\_
- SP/T.O \_\_\_\_\_
- SP/T. HQ \_\_\_\_\_
- DSP/L/OS \_\_\_\_\_
- P.O./C.C. \_\_\_\_\_
- PA/EC-II \_\_\_\_\_
- AS./C.Cell \_\_\_\_\_

CRC ✓  
18/11/20

(SYED ANIS-UL-HASSAN)  
Registrar  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

R-U  
attached with p  
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TO BE TRUE COPY

13650  
8/10/20



cpc  
8/10/20

(17)

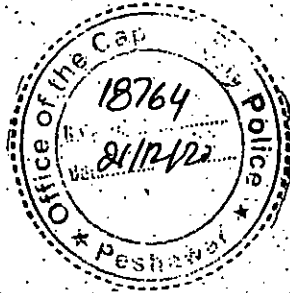
OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA,  
Central Police Officer,  
Peshawar.

No. 15627 / E-IV, dated Peshawar, the 21/12/2020

To: The Capital City Police Officer,  
Peshawar.

Subject: APPLICATION

Memo.



Please refer to this office Endst: Nos. 11731-32/E-IV, dated: 06.10.2020, No. 13242-43/E-IV, dated 06.11.2020 & No. 13735/E-IV, dated 16.11.2020 on the subject noted above.

The desired reply / report is still awaited which may, please be expedited at the earliest.

- C.C.P.O. \_\_\_\_\_
- SSP/O \_\_\_\_\_
- SSP/I \_\_\_\_\_
- SP/Cantt \_\_\_\_\_
- SP/City \_\_\_\_\_
- SP/Rural \_\_\_\_\_
- SP/Sec \_\_\_\_\_
- SP/HQ \_\_\_\_\_
- SP/T.O \_\_\_\_\_
- SP/T. HQ \_\_\_\_\_
- DSF/LOS \_\_\_\_\_
- P.O./C.C. \_\_\_\_\_
- PA/EC-II \_\_\_\_\_
- AS/C.Cell \_\_\_\_\_

CPC

21.12.20

(SYED ANIS-UL-HASSAN)  
Registrar  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

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TO BE TRUE COPY

R.K  
Link with PPS  
and n/action

21/12

سروس ٹریبونل صیبر وکٹو خواجہ اور

2023ء 2 منجانب

زیر شاہ بنام لوئس وکٹو

Service Appeal

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

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

کیلئے لبرٹ احمد شاہ، عبدالرحمن

آن مقام پشاور

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخنتہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

2023ء

ماہ جون

27

المرقوم

العبد د گ و اہ العبد د

کے لئے منظور ہے۔

Shah  
Kasani

مقام

16

زیر شاہ ولد مل کسیر (حصہ کارشل لوئس ڈیپارٹمنٹ)