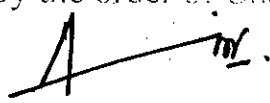


FORM OF ORDER SHEET

Court of _____

Appeal No. 1435/2023

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 05/07/2023 | <p>The appeal of Mr. Muhammad Javed resubmitted today by Mr. Kashif Ahmad Tarakai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p> |


This is an appeal filed by Mr. Muhammad Javed Ali today on 31/05/2023 for correction of date of Birth against which he made/preferred departmental appeal/representation on 31.03.2023 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Annexures of the appeal are unattested.
- 2- Memorandum of appeal be signed by the appellant.
- 3- Affidavit be got attested by the Oath Commissioner.
- 4- Necessary party be made in the heading of the appeal.
- 5- Address of respondent no.3 is incomplete which be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 6- Copy of official record which shows the date of birth of the appellant is not attached with the appeal.

No. 1562/ST,

Dt. 01/06/2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kashif Ahmad Tarakai Adv.
High Court Peshawar.

*Re submitted after necessary completion
more over the official record where in
date of birth is mention is already
attached as pages 7-9. more over all the
necessary parties has been added has respondents.*

05-07-2023

Kashif Ahmad.

BEFORE THE SERVICE TRIBUNAL, KHYBER

PAKHTUNKHWA, PESHAWAR

A. No. 1435/2023

Muhammad Javed Ali

..... Appellant

Versus

SSP and others

..... Respondents

I N D E X

| S.No | Description of documents | Annexure | Pages |
|------|--|----------|-------|
| 1. | Grounds of Appeal | | 1-6 |
| 2. | Application <i>for interim relief</i> | | 7-8 |
| 3. | Copy of Medical Certificate | A | 9-9 |
| 4. | Copies of CNIC, school leaving certificate | B | 10-11 |
| 5. | Copy of the correction in FRP record and salary slip | C | 12-22 |
| 6. | Wakalat Nama | | 23 |

Applicant/Appellant

Through

Kashif Ahmad
Kashif Ahmad Tarakai
Advocate, Peshawar.
Cell # 0335-9204483

Arbab Saiful Kamal Khan
Advocate, Peshawar.

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

A. No. 1435/2023

Muhammad Javed Ali S/o Ali Shair Khan R/o Kababyan,
Warsak Road, Peshawar, serving as Constable (DFC) at City
Traffic Police, Peshawar.

..... Appellant

Versus

1. SSP / Chief Traffic Officer, Peshawar.
2. Inspector General of Police, Khyber Pakhtunkhwa,
Peshawar.
3. Capital City Police Officer, Police Line, Peshawar
4. Commandant FRP, Peshawar.

..... Respondents

**Appeal under Section 4 of the Service Tribunal Act
against the appellate order dated 05.05.2023
whereby the representation for correction of date
of birth as 03.13.1965 instead of 19.10.1963 was
rejected for no legal reason.**

=====

Respectfully Sheweth:

1. That the appellant was appointed Constable in the
year 1991.

2. That at the time of entry into FRP when medical certificate was issued after examination of appellant and perusal of documents of the appellant, the same was mentioned as 1965 by the medical superintendent police hospital, Civil Secretariat, Peshawar. **(Copy of Medical Certificate is annex. "A")**.
3. That the correct date of birth of the appellant is 13.03.1965 which is correctly mentioned in NADRA record i.e. CNIC, school leaving certificate, medical certificate issued by medical superintendent. **(Copies of CNIC, school leaving certificate and medical certificate are attached as annexure "B")**.
4. That in the record of respondents, the date of birth of the appellant as mistakenly written as 19.10.1963 which is to be corrected as 13.03.1965.
5. That the appellant approached the concerned quarters within the permissible time (within two years of his appointment for correction of his date of birth in the police record) wherein after considering the school leaving certificate, medical certificate, CNIC of the appellant, the same was corrected by the SRC branch on 10.10.1992 duly stamped by the Command FRP, the same corrected date of birth was corrected in the record of accountant general office but he same was

mistakenly or malafidely not corrected in service book of the appellant. **(Copy of the correction in FRP record and salary slip are attached as annexure "C").**

6. That it has come to the knowledge of the appellant that the respondents have not corrected the date of birth in the service book of the appellant which will create problems in the future for the appellant.

7. That the appellant prepared representation / departmental appeal to the respondent NO. 1 on 30.03.2023 mentioning therein regarding the correct date of birth i.e. 13.03.1965 in CNIC, school leaving certificate, police medical certificate etc. but the same was refused vide order dated 05.05.2023 without any legal reasons, hence this appeal on the following grounds:

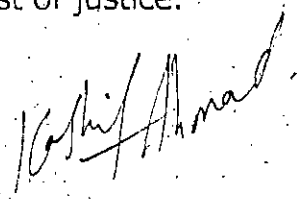
GROUND:

A. That it is the right of the appellant to have his correct date of birth in his service book according to CNIC, school leaving certificate, medical certificate issued by medical superintendent, salary slips and record of commandant office.

- B. That malafide of the respondents is apparent from the record and they are bent to deprive the appellant from his two years service in an illegal manner.
- C. That if the date of birth is not corrected then the poor family of the appellant will be suffer and the educations of his children will also come to an end.
- D. That the date of birth can be corrected at any time under the claim is based on truth and reliable record.
- E. That now the respondents could refuse to correct the date of birth in presence of there on corrected documents i.e. medical certificate, pay slips, record of FRP, duly stamped by the respondent No. 4.
- F. That the appellant received the right to agitate any other ground at the time of hearing.

It is, therefore, most humbly prayed that on acceptance of this appeal, the order dated 05.05.2023 be set aside and the correct date of birth 13.03.1965 be inserted in his salary book by deleting 19.10.1963 with all back/service consequential benefits in the interest of justice.

Through

Appellant 

Kashif Ahmad Tarakai

Arbab Saiful Kamal Khan
Advocates, Peshawar.

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

Muhammad Javed Ali Appellant

Versus

SSP and others Respondents

**APPLICATION FOR ALLOWING THE
APPELLANT TO SERVE THE DEPARTMENT
DURING THE PENDENCY OF THE APPEAL.**

Respectfully Sheweth:

1. That the appellant has filed the instant appeal in which no date of hearing is fixed yet.
2. That the appellant has got a prima facie case and is hopeful about its success.
3. That the balance of convenience also lies in favour of the appellant.
4. That if the application is not allowed the applicant will suffer irreparable loss.

6A

5. That the applicant is a poor person and only bread owner of the whole family and the education of his children is also dependent upon the salaries of the applicant.

It is, therefore, most humbly prayed that on acceptance of this application, the applicant be allowed to share the department with decision of the appeal in the interest of justice.

Applicant/Appellant

Through

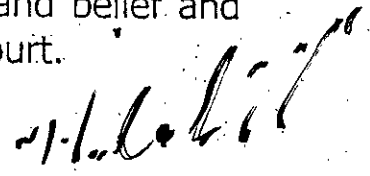


Kashif Ahmad Tarakai
Advocate, Peshawar.
Cell # 0335-9204483

Arbab Saiful Kamal Khan
Advocate, Peshawar.

AFFIDAVIT

I, Muhammad Javed Ali S/o Ali Shair Khan R/o Kababyan, Warsak Road, Peshawar, serving as Constable (DFC) at City Traffic Police, Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

MA-128-90-51783D

MEDICAL CERTIFICATE

16

Name of Official Mr. Mohammed Javed Ali
 Religion (Muslim)
 Father's name Mr. Nisar Khan
 Residence N.P. 2 - Moh. G. G. Chowk Sultanabad
Taluk and District Mandan
 Date of birth 1965
 Exact height by measurement
 Personal mark of identification A small vascular scar on lower part of forehead
 Signature of the Official
 Signature of head of office

Seal of Office [Signature]
 Deputy Commandant,
 Frontier Force Police,
 M.W.B. Peshawar.

I do hereby certify that I have examined Mr. Mohammed Javed Ali a candidate for employment in the office of the Police Deptt and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except nil.
 I do not consider this as disqualification for employment in the office of the Police Deptt. His age according to his own statement 28 years and by appearance about 28 years.

12

[Signature]
 Medical Superintendent
 Service Hospital
 Peshawar

[Signature]
 Medical Superd./Civil
 Surgeon Peshawar
 Medical Superintendent
 Civil Hospital
28/11/57

EDMAN / GUMPE / RESSION

N. W. P. Form No. 10

28-90-017938

MEDICAL CERTIFICATE

Name of Official: Mr. M. Javed
 Caste or race: Muslim
 Father's name: Mr. M. Javed
 Residence: V.P. 2, Moh. Gulistan, Sialkot
 Date of birth: 1965
 Exact height by measurement: _____
 Personal mark of identification: A small circular scar on lower part of forehead
 Signature of the Official: _____
 Signature of head of office: _____

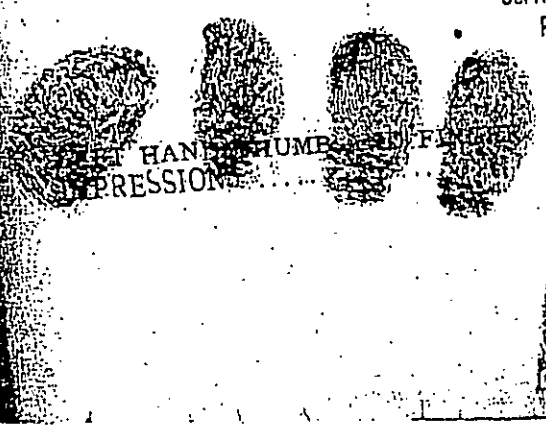
Seal of Office
 Deputy Commissioner,
 Peshawar
 Mill No. Peshawar

I do hereby certify that I have examined Mr. M. Javed a candidate for employment in the office of the Police Deptt. and can not discover that he had any disease communicable or other constitutional effectation or bodily infirmity except nil.

I do not consider this as disqualification for employment in the office of the Police Deptt. His age according to his own statement 28 years and by appearance about 28 years.

14/4/23
 Superintendent Account Section
 Services, Hospital
 Peshawar

Javed
 Medical Supdt./Civil
 Hospital Peshawar
 Medical Superintendent
 Civil Hospital
 28/11/51





SERVICES HOSPITAL PESHAWAR GOVERNMENT OF KPK OPD REGISTRATION

R-10

13

Name MI. JAVED ALI Age 56 Sex MALE

Department GENERAL OPD Address PESHAWAR

Hospital Yearly No. 63533-23 Dated 14-04-2023

History

RI- GBA

Clinical Examination

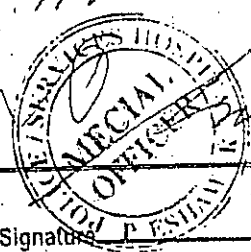
L Tab Kid-all
- 1W

Provisional Diagnosis

Int. Renal Stg
- 1W

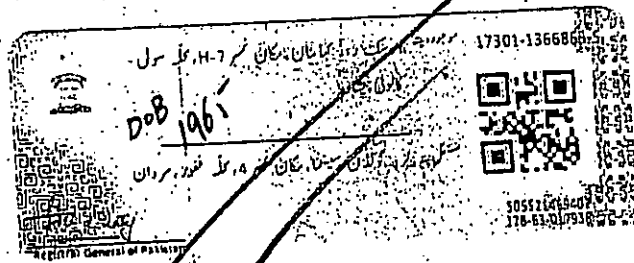
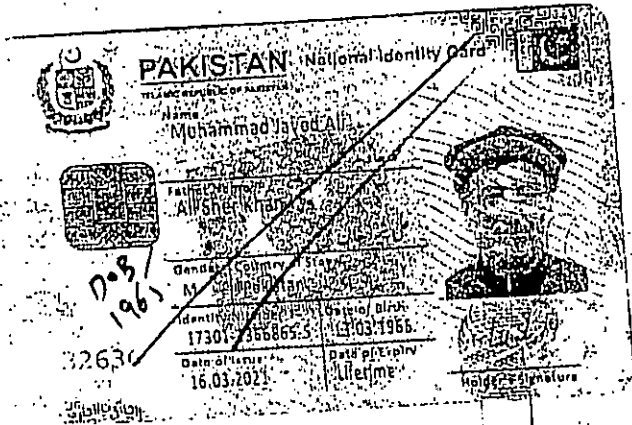
Investigations

Sys. Normal



Doctor on Duty _____ Doctor's Signature _____

Annexure B



گمشدہ کارڈ نمٹنے پر ترقیاتی ایئر بکس میں ڈال دیں

مدارسہ چھوڑنے کا سرٹیفکیٹ

ضلع حیدرآباد



محمد طالب علم محمد جاوید

رقبہ میدانی (13-3-1965) تہہ مارچ سن ۱۹۸۳ء درجہ تیسرا

03 مدرسہ چھوڑنے کا سرٹیفکیٹ

محمد جاوید ولد محمد سعید

اس کا امتحان میں جو

درجہ دہم میں زمرہ تعلیم تھا۔

اس کا امتحان ترقی دینے کے لئے

درجہ دہم میں زمرہ تعلیم تھا۔

اس کا امتحان ترقی دینے کے لئے

Conduct - Good

| نمبر | درسہ | داخل ہونے کی تاریخ | | خارج ہونے کی تاریخ | سال درمیان ضروری کثرت | | حاضرین ترقی سال میں | غائبین ترقی سال میں | رخصت ہونے کی وجہ سے |
|------|----------|--------------------|-----------|--------------------|-----------------------|----|---------------------|---------------------|---------------------|
| | | سکول میں | جماعت میں | | اسرا | قا | | | |
| ۱ | 13-13 | ۱۳ | ۱۳ | | | | | | |
| ۲ | ۱۳-۱۳ | ۱۳ | ۱۳ | ۱۳ | | | | | |
| ۳ | ۱۳-۱۳ | ۱۳ | ۱۳ | ۱۳ | | | | | |
| ۴ | حیدرآباد | ۱۳ | ۱۳ | ۱۳ | | | | | |
| | | | بیزان | | | | | | |

تاریخ اجراء ۲۷-۹-۸۳

صرف مکارثب پانچواں کی صورت میں

قسم کا لٹریچر _____

کس سال عطا ہوا _____

کون دیتا ہے _____

۱ _____ ۲ _____ ۳ _____

نوٹ: عام طور پر مدرسہ چھوڑنے کے سرٹیفکیٹ کے لئے درخواست مدرسہ سے علیحدہ ہونے کے ایک ماہ کے اندر مونی چاہئے۔ بصورت ان طلباء کے لئے جس نے سال سکول کا امتحان دیا ہے ایک ماہ تک اسکول کی تاریخ سے لے کر عطا کیے جائیں گے۔

اگر مدرسہ چھوڑنے کا سرٹیفکیٹ کم ہوجائے اور نئے سرٹیفکیٹ کے لئے درخواست دی جائے تو نئے سرٹیفکیٹ کے لئے موازی آٹھ آنے سے چارج ہوگی۔

تصدیق کیا جاتا ہے _____

مدرسہ _____

ضلع _____

جماعت _____

بیمہ ماشر _____




EMPLOYEE BIO-DATA

Human Resource Management System

City Traffic Police, Peshawar



PERSONAL INFORMATION

| | | | |
|-------------------------------------|--------------------------|---|---------------|
| Status (Regular/On Loan/Pay Attach) | Regular |  | |
| Category | Executive | | |
| DDO | SSP Traffic | | |
| Belt No | 547 | | |
| Name | MUHAMMAD JAVED ALI | | |
| Father Name | Ali Sher Khan | | |
| Gender | Male | CNIC | 1730113668655 |
| Mobile No | 03365202012 | Personal No | 36929 |
| Passport No | | Blood Group | |
| Date of Birth | 13-03-1965 | Religion | Islam |
| Maslak | Sunni | Caste | yousafzai |
| Present Address | warsak road sowal colony | | |
| Permanent Address | warsak road sowal colony | | |
| Police Station | Michni Gate | District (Domicile) | Peshawar |
| Appointment District | Peshawar | Appointment Date | 01-01-1991 |

QUALIFICATION

| Qualification | Institute | Year | Remarks |
|---------------|------------|------|---------|
| 8th Class | gov school | 1988 | Good |

POSTING

| Circle/Section | Sector/Sub Section | Place of Posting | Order Number | From Date | To Date | Remarks |
|----------------|--------------------|--------------------------------|----------------|------------|---------|---------|
| Cantt | Tahkal | Lifter Alkaram | 2210-15/OASI | 06-06-2022 | | |
| Cantt | Tahkal | Lifter Alkaram | 2346/2405-OASI | 11-11-2021 | | |
| Cantt | Saddar Road | DRIVER FORK LIFTER SADDAR ROAD | | 12-10-2020 | | |
| Town | Tahkal | Lifter Tahkal 2 | 131-145 | 03-02-2020 | | |
| Town | Tahkal | Lifter Tahkal | 1275-1290 | 15-11-2019 | | |

PROMOTION

| From Rank | From BPS | To Rank | To BPS | Order Number | Order Date | Promotion Type |
|-----------|----------|---------|--------|--------------|------------|----------------|
|-----------|----------|---------|--------|--------------|------------|----------------|

TRAINING

| Training Name | Institute | From | To | Result | Remarks |
|-----------------|-----------|------------|------------|--------|---------|
| Recruite Course | RTC Kohat | 01-01-1991 | 01-09-1991 | Pass | PASSED |

REWARD

| Type | Details | OB Number | Date | Remarks |
|--------|--|-----------|------------|---------|
| Reward | Moreover the following official are hereby granted /CC -iii for good performance of duty | 638 | 05-11-2020 | |

PUNISHMENT

| Type | Details | OB Number | Date | Remarks |
|------|---------|-----------|------|---------|
|------|---------|-----------|------|---------|

LEAVE

| Leave Type | From | To | OB Number | Date |
|------------|------------|------------|-----------|------------|
| Casual | 28-05-2020 | 12-07-2020 | 45 | 28-05-2020 |

FAMILY

| Name | Relation | Occupation | Age | Address |
|---------------|----------|-----------------|-----|--------------------|
| Ali Sher Khan | Father | Late | 75 | Irum Colony Mardan |
| Imtiaz Ali | Brother | Property Dealer | 22 | Irum Colony Mardan |
| Sajjad Ali | Brother | Property Dealer | 35 | Irum Colony Mardan |

AG KP Peshawar

S#: 1

P Sec:006 Month:April 2023

PR4093 -DDO FOR CAPITAL CITY POLI
PESHAWAR CITY POLICE (LAW

Pers #: 00036929 Buckle: 261

Name: MUHAMMAD JAVED ALI 1965

NTN:

GPF #: POL 044408

Old #:

CONSTABLE

CNIC No.1730113668655

GPF Interest Applied

07 Active Temporary

PR4093

PAYS AND ALLOWANCES:

| | |
|---------------------------------|-----------|
| 0001-Basic Pay | 39,970.00 |
| 1210-Convey Allowance 2005 | 1,932.00 |
| 1300-Medical Allowance | 1,500.00 |
| 1547-Ration Allowance | 681.00 |
| 1567-Washing Allowance | 150.00 |
| 1646-Constabulary R Allowance | 300.00 |
| 1902-Special Incentive Allownce | 775.00 |
| 2148-15% Adhoc Relief All-2013 | 582.00 |
| 2168-Fixed Daily Allowance | 2,730.00 |
| Gross Pay and Allowances | 60,343.00 |

DEDUCTIONS:

| | |
|---|--------------------|
| IT Payable 419.54 Deducted 1,928.00 | TAX: (3609) 210.00 |
| GPF Balance 225,508.00 | Subrc: 1,010.00 |
| 6505-GPF Loan Principal Instal. Bal: 0.00 | 6,000.00 |
| 3530-Police wel:Fud BS-1 to 18 | 799.00 |
| 4004-R. Benefits & Death Comp: | 450.00 |

Total Deductions 8,469.00

51,874.00

D.O.B

LFP Quota:

13.03.1965

THE BANK OF KHYBER SADDAR ROAD BRANCH P

31 Years 05 Months 001 Days

11549

Attisted
School 10th Class Certificate
DOB 13-3-1965

Annex 'c'

19-10-1992
MURAD ALI
Inspector Reserve Police
Muzafar
(Form No. 12.28). 10-10-1992

19

No. 2037

District Mardan

CHARACTER AND SERVICE ROLL OF

Mohd Javed Ali S/o Ali shah No 2037

CONTENTS.

| PARAS | PAGES. |
|--|--------|
| 1-5. General particulars | 1 |
| 6. Appointments, Promotions, Reduction, discharges, etc. | 2 |
| 7. Transfers beyond the district | 2 |
| 8. Relatives in Government employ | 3 |
| 9. Particulars of heirs | 3 |
| 10. Educational qualifications | 4 |
| 11. Professional attainments | 4 |
| 12. Medals and decorations | 5 |
| 13. Miscellaneous Particulars | 5 |
| 14. Commendatory entries | 6-8 |
| 15. Censures and punishments | 9-12 |
| 16. Leave, absence and breaks in service | 13 |
| 17. Record of posting of Inspectors, Sub-Inspectors, Assistant Sub-Inspectors. | |
| 18. Statement of land held by Lower Subordinates Rule 14.23 (1). | |
| 19. Progress reports of Probationary Inspectors, Sub-Inspectors and Assistant Sub-Inspectors | |
| 20. Medical history sheet | |
| 21. Leave account of Constables and Head Constables. | |
| 22. Marking sheet in connection with promotion to the selection grade of Constables. | |
| 23. Health certificate. | |

Attested
School 10th Class Certificate

DOB 13-3-1965

10-10-1992
SRC

FACTER AND SERVICE ROLL OF

Catalogue No. () in
Ditto () in
Ditto () in

Def in Condensed by
The 26/1/1992
COMMANDAN
Frontier Reserve P
M. J. J. Pathan
10-10-1992
District

| | | | | | | | | | | | | | |
|-----------------|---------------|----------------|-----------------|---------------------------|----------------|----------|----------|----------------------------|----------------|-------------------|-------------------|------------------|-------------------|
| Name | Father's Name | Tribe or caste | Village of Town | Post and Telegraph Office | Police Station | District | Province | Date of Birth 13-3-1965 | SRC-10-10-1992 | Chest Measurement | Date of Enrolment | Age on Enrolment | Distinctive Marks |
| Mohd. Javed Ali | Ali Sher Khan | Muslim | Buricham | B. Division | Marchan | Narail | | (19-10-63) OLD | 5' 4" | 31 x 32 | 1-12-91 | 28 years | 20 |

Verification Roll No. _____ dated _____ received back and attached to the Patta Misal

Government Service prior to present employment, which is approved for pension service.

| Service or department | Rank or grade | Pay of last Appointment | From | To | PERIOD | | |
|---|---------------|-------------------------|---|----|--------|--------|------|
| | | | | | Year | Months | Days |
| | | | | | | | |
| Cause of and character of discharge from above service. | | | Reference to orders approving above service for pension service in the Police Department. | | | | |

Agreement:—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, has been explained to me. I agree to serve faithfully under the provision of the said Police Act and to obey all lawful orders issued to me by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a certificate of appointment issued under section 8 of the Police Act (V of 1861).

Signature
COMMANDANT.
Frontier Reserve Police.
M. J. J. Pathan
10-10-1992

Rolled impresson of fingers and thumb of left hand

| | | | | |
|-------------|-----------|-------------|------------|------------|
| Left Little | Left ring | Left middle | Left index | Left thumb |
| | | | | |

CHARACTER ROLL OF

(contd)

10. EDUCATIONAL QUALIFICATIONS.

| Educational qualification. | Knowledge of languages |
|----------------------------|------------------------|
| Un-educated. | English. |
| Slightly educated. | Persian. |
| Matriculation. | Urdu. |
| First Arts | Punjabi. |
| Degree. | Pushto. |

Attisted
9th Education

School 10th class Certificate

DOB 13-3-1965
19-10-1992

GORC ANDANT
Frontier Reserve Police
for Curzala Peshawar
10-10-1992

21

Notes.—Under line the qualification possessed, and particulars where necessary and give date of entry.

11. PROFESSIONAL ATTAINMENTS AND SPECIAL QUALIFICATIONS.

| Professional attainments | Special qualifications. |
|--|----------------------------------|
| Passed Training School Upper Class. | Clerical duties. |
| " " Intermediate Class. | Accountant's duties |
| " " Lower Courses. | Orderly Head Constable's duties. |
| " " Drill Instructor's Course. | Moharrir's duties. |
| " " Prosecuting Inspector Examinations | Detective duties. |
| | Traffic duties |

General
Pay Fixation in the revised pay scale 1992
1400-66-2390 5
1532
with next increment on 1-1-2014

Accounts Officer
Pay Fixation Party W. R. T. Peshawar

13
0-85

Under line course passed and qualifications possessed.

Registered School 10th Class Certificate

ریگولس سکول پٹری شہید

27
23
آخری درجہ بندی و معیار

COMMANDING 13-73-1965
Frontier Reserve Police
N.W.F.P. Peshawar
10-10-1992

| | | | | |
|-----------|---------------|--------------------|-------------|--------------|
| نام | محمد عارف علی | کنیٹا کمانڈر 2937 | ولایت | پشاور |
| تعلیم | مڈل | تاسیخ نمبر 1012-91 | سالہ ملازمت | 20-9-92 |
| تاریخ آمد | 31-12-71 | تاریخ روانگی | | |
| عمر | 13-3-1965 | OLD 19-10-63 | عمر | OLD 19-10-63 |
| قد | 5-3-3/4 | قد | 5-3-3/4 | |
| بھائی | 23 | بھائی | 33 X 34 1/2 | |
| وزن | 120 | وزن | 118 | |

قانون کا امتحان برائے خواندہ

| نمبر | مضمون | کل نمبرات | حاصل کردہ نمبرات |
|------|-----------------------------|-----------|------------------|
| 1 | تجزیاتی مسائل | 100 | 100 |
| 2 | ضابطہ پرمات | 100 | 100 |
| 3 | لوکل اینڈ سٹیٹ لاء (لائسنس) | 100 | 100 |
| 4 | پولیس رولز | 100 | 100 |
| 5 | آئل لاء (آئل ریگولیشن) | 100 | 100 |
| 6 | اسلامیات | 100 | 100 |
| 7 | وٹرس | 100 | 100 |
| 8 | جزل لاء (قانونی) | 100 | 100 |

ڈرن

| | | |
|----|------------|----|
| 1 | سنگھار ڈرن | 37 |
| 2 | سنگھار ڈرن | 44 |
| 3 | سنگھار ڈرن | 20 |
| 4 | سنگھار ڈرن | 15 |
| 5 | سنگھار ڈرن | 05 |
| 6 | سنگھار ڈرن | 05 |
| 7 | سنگھار ڈرن | 15 |
| 8 | سنگھار ڈرن | 09 |
| 9 | سنگھار ڈرن | 18 |
| 10 | سنگھار ڈرن | 14 |
| 11 | سنگھار ڈرن | 24 |
| 12 | سنگھار ڈرن | 08 |
| 13 | سنگھار ڈرن | 08 |
| 14 | سنگھار ڈرن | 06 |

قانون کا امتحان برائے ناخواندہ

| | | | |
|---|--------------------------------|-----|-----|
| 1 | قانون کا امتحان برائے ناخواندہ | 100 | 164 |
|---|--------------------------------|-----|-----|

چیفٹا ڈائریکٹر
آر. اے. سی. کراچی

To,

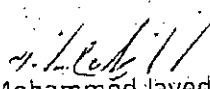
Chief Traffic Officer,
Peshawar.

Subject: Application/Representation for correction of date of birth in the record as 13/03/1965
instead of 19/10/1963 which is wrongly been recorded by the official respondents.


Respectfully it is stated that,

1. That the applicant was appointed as constable on 01/12/1991 and since his appointment till this date he is serving to the best of his abilities and has never given a chance of displeasure to the superiors.
2. That the correct date of birth of the applicant is 13/03/1965 and the same is also maintained in all the necessary documents i.e. CNIC, School Leaving certificate, Police Medical certificate, Payroll, Employment Bio Data etc. But mistakenly due to some human error it is recorded as 19/10/1963 in the service book which would certainly effects the rights of applicant regarding his service career.
3. That the applicant prepared many applications to the officials for doing the needful and for correction of his date of birth in the official record but no heed has been paid to his genuine grievance.
4. That there is no legal herden in the correcting the date of birth in the official record/service-book in a genuine case like that of applicant.

It is, therefore most humbly prayed that the date of birth of the applicant i.e. 13/03/1965 be corrected/recorded in the record by deleting the wrong date of birth i.e 19/10/1963 in the interest of justice.


Constable Mohammed Javed Ali
DFC Belt No. Traffic-565 & Belt No. CCP-547

(23 Pages attached with this letter)

Dated: 30/3/2023




OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 6026 ICRC, dated Peshawar 10/05/2023


TO: CHIEF TRAFFIC OFFICER
PESHAWAR.

Subject: **APPLICATION/REPRESENTATION FOR CORRECTION OF
DATE OF BIRTH IN THE RECORD AS 13.03.1965
INSTEAD OF 19.10.1963 WHICH IS WRONGLY BEEN
RECORDED BY THE OFFICIAL RESPONDENTS.**

Memo: Please refer to your office memo No.2051/SRC-II, dated
19.04.2023 on the subject noted above.

The date of birth case of driver constable Muhammad Javed
Ali No.547/565/T of CCP Peshawar is hereby returned alongwith the
report of SP/Legal, CCP Peshawar to proceed further into the matter.

Encl (01)


For Capital City Police Officer,
Peshawar *Amir*

REFERENCE ATTACHED.

Subject: APPLICATION/REPRESENTATION FOR CORRECTION OF DATE OF BIRTH IN THE RECORD AS 13.03.1965 INSTEAD OF 19.10.1963 WHICH IS WRONGLY BEEN RECORDED BY THE OFFICIAL RESPONDENTS.

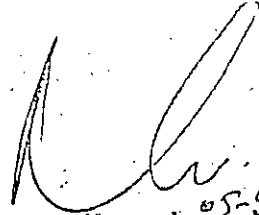
Please refer to your office diary No.1961/PA HQrs., dated 20.04.2023 on the subject cited above.

With reference to the attached papers in hand, which reveals that applicant Muhammad Javed Ali DFC No.565/Traffic & No.547/CCP has preferred an application for correction of his date of birth as 13.03.1965 instead of 19.10.1963 in the official record.

In this connection, the following points needs consideration;




- 1) The officer could get his date of birth changed on furnishing adequate documentary evidence within two years of the employment, remained silent for more than sufficient time and did nothing to agitate against such entry despite it being within his conscious knowledge. Civil servant, who had slept over his right more than 15/16 years, could not be allowed to agitate dead issue at such belated stage [1994 SCMR 1633 ref 1995 PLC (CS) 1067 (b)].
- 2) Date of birth shown in character roll or corresponding record of Police official can be altered only with the sanction of IG Police on production of proof to his satisfaction. Under proviso to Rule 9-7 of Police Rules 1934 (amended 2017) such an alteration may only be made after special enquiry if applied within two years of entry of Police official into service. Police official is required to approach the forum under Rule ibid for correction his date of birth [2008 TD 451].

Submitted please.


SP/Legal, 05-5-23
CCP, Peshawar.

SP HQrs: Please.

CR C
Proceed in light of above
opinion
5523

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|-------------------------------|-------|---|--|---|
| 50 | 71699 |  |  |  |
| ایڈووکیٹ: <i>Kashif Ahmad</i> | | | | |
| بار کونسل ایسوسی ایشن نمبر: | | | | |
| رابطہ نمبر: 0335 9204483 | | پشاور بار ایسوسی ایشن، خیبر پختونخواہ | | |

بعدالت جناب: *محمد شکیل احمد* / *محمد شکیل احمد*

| | |
|--------|-----------|
| مخائب: | دعویٰ: |
| | علت نمبر: |
| | مورخہ: |
| بنام | جرم: |
| | تھانہ: |

باعث تحریر آنگہ

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

آن مقام *محمد شکیل احمد* کیلئے *محمد شکیل احمد* کے اصرار سے *محمد شکیل احمد* کو وکیل مقرر کر کے اترار کیا جاتا ہے کہ صاحب موضوع کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے، جواب دعویٰ اقبال و دعویٰ اور درخواست از ہر قسم کی تصدیق و زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل ثمرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے اصرار یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور ان کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو چیز ہر جائے التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 17/05/2023

العبد *محمد شکیل احمد* العبد

مقام کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کاپی تاحال قبول ہوئی۔

Kashif Ahmad

Accepted

Kashif Ahmad

محمد شکیل احمد
محمد شکیل احمد
محمد شکیل احمد