



31st July, 2023

1. Learned counsel for the appellant present. Mr. Muhammd Jan learned District Attorney for the respondents present.
2. Arguments heard. To come up for order on 04.08.2023 before D.B. P.P given to parties.


(Muhammad Akbar Khan)
Member (E)


(Rashida Bano)
Member (J)

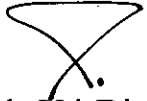
KaleemUllah


1st June, 2023

1. Learned counsel for appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

2. Being not prepared, learned counsel for appellant requested for adjournment. Adjourned. To come up for arguments on 05.07.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Salah-Ud-Din)
Member (J)


(Kalim Arshad Khan)
Chairman


Mutazem Shah


5th July, 2023

1. Learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

2. Because of incomplete record as usual this case is adjourned on payment of cost of Rs. 10000/- on the respondents with the direction to produce entire record and also the documents regarding communication of the appellate order to the appellant soon after his passage. To come up for arguments on 31.07.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Rashida Bano)
Member (Judicial)


(Kalim Arshad Khan)
Chairman

Adnan Shah

1st Mar, 2023

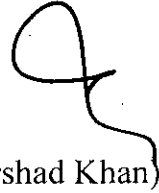
Clerk of learned counsel for appellant present. Mr. Umair Azam, Additional Advocate General for respondents present.

Counsel are on strike. The case is adjourned. To come up for arguments on 09.05.2023 before D.B. PP given to the parties.

SCANNED
KPST
Peshawar



(Rozina Rehman)
Member (J)



(Kalim Arshad Khan)
Chairman

09.05.2023

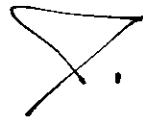
Appellant in person present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Peshawar High Court, Peshawar. ~~Adjourned.~~ Adjourned. To come up for arguments on 01.06.2023 before D.B. Parcha Peshi given to the parties.

Bo



(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)

Kamranullah

Late Diary
10th Oct, 2022

Despite direction for fixation of the cases for the shortest possible dates, the office has fixed this case for a longer date. The Reader of the court is warned to be careful in future. The date fixed in this case is accelerated to 16 / 11 / 2022. Notices be issued to the parties and their counsel for the date fixed.

Counsel was informed telephonically for the date fixed on 11/11/22

(Fareeha Paul)
Member (E)

(Kalim Arshad Khan)
Chairman

16.11.2022

Nemo for appellant.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Notices be issued to appellant and his counsel for the date fixed. To come up for arguments on 14.12.2022 before D.B

SCANNED
KPST
Peshawar
Counsel was informed telephonically on 6/12/22

(Fareeha Paul)
Member (E)

(Rozina Rehman)
Member (J)

14th Dec. 2022

Due to strike of the Bar and Mrs. Rozina Rehman, learned Member (J) being on leave, this matter is adjourned to 01.03.2023 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.

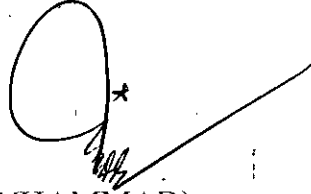
SCANNED
KPST
Peshawar

(Fareeha Paul)
Member(E)

05.07.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Due to paucity of court time, arguments could not be heard. Adjourned. To come up for arguments before the D.B on 04.08.2022.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

4-8-2022

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


Reader

10th Oct, 2022

Appellant in person present. Mr. Kabirullah Khattak,
Addl: AG for respondents present.

Appellant seeks adjournment on the ground that his counsel is not available today. Last opportunity is granted to the appellant argue the case failing which the case will be decided on the available record without arguments. To come up for arguments on 14.12.2022 before the D.B.



(Farecha Paul)
Member(Executive)

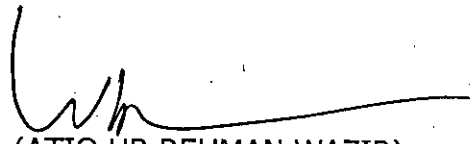


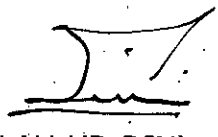
(Kalim Arshad Khan)
Chairman

02.09.2021

Mr. Sheeraz Hussain, Advocate, counsel for the appellant present. Mr. Usman Ghani, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not met preparation for arguments. Adjourned. To come up for arguments before D.B on 01.12.2021.


(ATIQ UR REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

01.12.2021

Due to non-availability of Db, the case is adjourned to 14-03-2022.


Amir
Reades

14-3-22

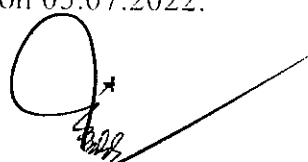
Due to Retirement of the Hon'ble Chairman the case is adjourned to come for the same as before on 16-6-22



Amir
Reades

16.06.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he is not feeling well. Adjourned. To come up for arguments, before the D.B on 05.07.2022.

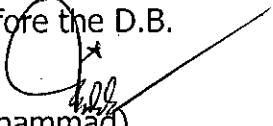

(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

22.12.2020

Nemo for the appellant. Asstt. AG for the respondents present.

The issue with regard to retrospective application of penalty is yet to be decided by the Larger Bench. Instant matter is, therefore, adjourned to 25.03.2021 for hearing before the D.B.


(Mian Muhammad)
Member(E)


Chairman

25.03.2021

Junior to counsel for the appellant present. Mr. Kabirulalh Khattak learned Addl. AG for respondents present.

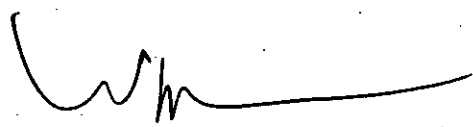
The Worthy Chairman is on leave, therefore, the case is adjourned to 24.06.2021 for arguments before D.B.

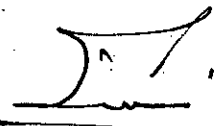

(Atiq-Ur-Rehman Wazir)
Member (E)

24.06.2021

Appellant alongwith his counsel Mr. Sheraz Hussain, Advocate, present. Mr. Javed Ullah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not met the preparation for arguments due to some domestic problems. Adjourned. To come up for arguments before the D.B. on 02.09.2021.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)


13.07.2020


Appellant present in person.

Mr. Muhammad Jan learned Deputy District Attorney for the respondents present.

Appellant made a request for adjournment on the ground that his counsel is not available.

Adjourned to 13.10.2020 before D.B.

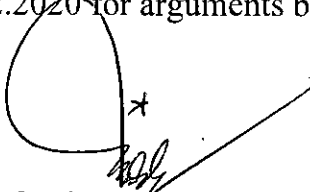

(Attiq ur Rehman)
Member (E)


(Rozina Rehman)
Member (J)

13.10.2020

Learned counsel for the appellant is present. Mr. Kabirullah, Additional Advocate General for respondents are present.


Learned Additional Advocate while making reference to impugned order dated 14.07.2008, submitted that retrospective effect has been given by the Authority to the referred to order, the issue with retrospectivity is pending before the Larger Bench of this august Tribunal constituted for the purpose therefore, unless and until judgment is made by the worthy Larger Bench of this Tribunal, this appeal is kept pending. File to come up for further proceedings on 23.12.2020 for arguments before D.B.



(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

24.09.2019


Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned to 09.12.2019 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

09.12.2019

Lawyers are on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for further proceedings/arguments on 10.02.2020 before D.B.


Member


Member

10.02.2020

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 16.04.2020 for arguments before D.B.


(Hussain Shah)
Member

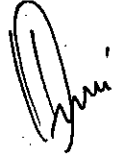

(M. Amin Khan Kundi)
Member

07.02.2019

Counsel for the appellant and Addl. AG alongwith Muhammad Raziq, H.C for the respondents present.

Reply on behalf of respondents has been submitted. To come up ~~for~~ before D.B for arguments on 24.04.2019. The appellant may submit rejoinder within fortnight, if so advised.


Chairman



24.04.2019

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG for the respondents present.

Learned counsel for the appellant states that the copy of reply handed over to the appellant did not pertain to the appeal in hand, therefore, the requisite rejoinder could not be submitted. Today he has been handed over a copy of reply available on judicial record with the directions to submit the requisite rejoinder within a fortnight. The appeal is adjourned to 09.07.2019 for argument before D.B.



Member




Chairman

09.07.2019

Appellant with counsel present. Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 24.09.2019 before D.B.



Member



Member

17.10.2018

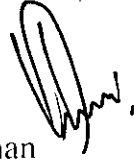
Appellant in person present. Mr. M. Raziq, H.C alongwith Mr. Kabirulalh Khattak, Addl: AG for respondents present. Written reply not submitted. Requested for adjournment. Granted. Case to come up for written reply/comments on 03.12.2018 before S.B.

(Ahmad Hassan)
Member

~~03.12.2018~~

Counsel for the appellant present. Mr. M. Raziq, H.C alongwith Mr. Kabirullah Khattak, Addl: AG for respondents present.

Representative of the respondents seeks further time for submission of requisite reply. Learned counsel for the appellant does not resist the request, However, states that the instant adjournment would be 3rd for the purpose. Adjourned to 16.01.2019 for written reply/comments before S.B.

Chairman 

16.1.2019

Appellant in person and Addl. AG alongwith Muhammad Raziq, H.C for the respondents present.

Representative of respondents once again requests for adjournment for submission of requisite reply. Adjourned to 07.02.2019 with the warning that the matter would be proceeded with on the strength of available record in case the reply is not received on the next date.

Chairman 

25.06.2018

Learned counsel for the appellant present. Preliminary arguments heard

Aggrieved against the order dated 14.07.2008 of respondent No.1 whereby the appellant was removed from service due to absence from duty and against the appellate order 18.10.2008 of respondent No.1 whereby departmental appeal of the appellant against the original removal order was dismissed, the appellant has filed the present service appeal on 14.06.2018. Learned counsel for the appellant contended that though the appellant has filed the present service appeal, against the orders passed in 2008, in the year 2018 however since retrospective punishment was awarded to the appellant vide the original impugned order therefore period of limitation would not run against the same.

Points raised need consideration. The present appeal is admitted for regular hearing subject to all legal objections including the issue of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 17.08.2018 before S.B.

Appellant Deposited
Security & Process Fee


Member

SCANNED
K. ST
Peshawar

17.08.2018



Neither appellant nor his counsel present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply not submitted. Learned AAG sought some time to submit the same. Granted. Case to come up for written reply/comments on 17.10.2018 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 801/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/06/2018	<p style="text-align: center;">The appeal of Mr. Liaqat Ali Shah presented today by Mr. Sheeraz Hussain 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-		<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25-6-2018</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Appeal No. 801/2018

Liaqat Ali Shah

VERSUS

Superintendent of Police Khyber Pakhtunkhwa Peshawar

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8.	Copy of leave Application	"C"	13
9.	Copy of prescriptions	"D"	14-31
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Dated: 13/06/2018

Petitioner/Appellant

Through

Sheraz Hussain
Sheraz Hussain

SHERAZ HUSSAIN
Advocate, High Court Peshawar

Peshawar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

Appeal No. 801/2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1055

Dated 14-6-2018

Liaqat ali shah S/O Syed Ghafoor Shah R/o Mohallah Saidan Village
akbar pura Distt Nowshera.....Appellant

VS

- 1) SUPERINTENDENT OF POLICE CAPITAL POLICE
PESHAWAR KHYBER PAKHTUNKHWA, PESHAWAR.
- 2) CAPITAL CITY POLICE OFFICER PESHAWAR KHYBER
PAKHTUNKHWA, PESHAWAR.
- 3) INSPECTOR GENERAL OF POLICE PESHAWAR KHYBER
PAKHTUNKHWA PESHAWAR

.....RESPONDENTS

APPEAL AGAINST THE OFFICE ORDER OB No
1949 DATED 14-07-2008 PASSED BY
RESPONDENT NO.1 WHEREBY THE APPELLANT
HAVE BEEN REMOVED FROM SERVICE DUE TO
LONG ABSENCE FROM DUTY or appellate order
dated 18/10/2008 OF RESPONDENT NO. 2
WHEREBY APPEAL OF APPELLANT AGAINST
DISMISSAL ORDER WAS DISMISSED

Filed to-day
Registrar
14/6/18

PRAYER

ON ACCEPTANCE OF THIS APPEAL, THE
IMPUGNED OFFICE ORDER OB No 1949 DATED 14-
07-2008 OF RESPONDENT NO.1 APPELLATE ORDER
of dated 18/10/2008 of Respondent No.2 MAY KINDLY

*BE SET ASIDE AND THE APPELLANT MAY KINDLY
BE ORDERED TO BE REINSTATE IN SERVICE WITH
ALL BACK BENEFITS ACCORDING TO HIS
SENIORITY.*

RESPECTFULLY SHEWETH,

1. That the appellant was appointed as constable vide office appointment order dated. 01/07/1985 in the police department. (Copy of appointment/enlistment order is attached as Annex A).
2. That after appointment the appellant was performing his duty to the best of his ability and has given no chance of displeasure to his superior.
3. That during performing of his duty the appellant was confronted with notorious criminals and during exchange of fire he got seriously injured, while receiving bullet on his leg due to which he was hospitalized and was advised by the doctors for a long bed rest. (Copy of FIR is attached as Annex B).
4. That the appellant was recovered from his injuries and attend his duties regularly, but unfortunately in 2007, the appellant leg was broken and also suffering from typhoid and in treatment the Doctor advised bed rest, therefore the appellant moved an application on 8.10.2007, which was allowed by the respondent No.1. (Copy of leave application is annex-C).

5. That the appellant was constantly treated his leg injury by making frequently visits to hospitals/ doctors, whereby he was advised medicines, bed rest etc. **(Copy of prescriptions are attached as Annex-D.**

6. That the respondent No 1, without adopting proper procedure i.e. issuing show cause / Charge sheet statement of allegation/ conducting regular inquiry, dismissed the appellant from service vide impugned order dated. 14.7.2008. It is pertinent to mention here that the whole proceedings taken by the respondent No.1 against the appellant was ex-parte, inspite of the fact that appellant was actively pursuing his case.**(Copy of Dismissal of Respondent No. 1 is annexure E)**

7. That against the order of dismissal the appellant filed departmental appeal, which was also turn down vide order dated 18-10-2008 without any cogent or legal reasons.**(Copy of application of departmental appeal and dismissal order of Respondent No.2 is attached as annexure F & G)**

8. That the respondent No.2 being appellate authority failed to appreciate that the appellant is having more than 22 years of service for which no benefits has been given to the appellant, but instead of that the appeal of the appellant was dismissed without applying judicial mind.

9. That the appellant due to his illness was on bed rest and did not find out about the outcome of his departmental appeal 1.6.2008. On 1.6.2018 the appellant during his visit to office was handed over the impugned appellate order dated 18.10.2008, Hence this appeal on the following grounds as under.

GROUND.

- A) That the impugned order of respondent no 1 is illegal unlawful and against the law.
- B) That the absence is not willful but due to illness which was very much in the knowledge of the respondents department.
- C) That the regular inquiry in to the matter was never conducted whereby the appellant was deprived of the opportunity to clarify his position.
- D) That the punishment is too harsh and does not commensurate with the guilt if any.
- E) That the appellant has denied the benefits of service spread over 22 years long period.
- F) That the absence if any dose not continue misconduct if not willful.
- G) That the appellant was dismissed from service from a retrospective date, which is bad in the eyes of law and is void ab-initio.
- H) That the appellant will agitate any other grounds at the time of arguments.

It is therefore, humbly prayed that on acceptance of this appeal the impugned order of respondent No.2 dated 18/10/2008 and order of dismissal of the respondent No.1 dated 14/07/2008 may kindly be set aside and appellant may kindly be re instated in the service with all back service benefits.

Dated: 13/06/2018

Asif Aman
Appellant

Through

Sheraz Hussain
Sheraz Hussain

&

Mian Asif Aman
Mian Asif Aman
Advocates, High Court
Peshawar

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Liaqat Ali Shah

VERSUS

Superintendent of Police Khyber Pakhtunkhwa Peshawar

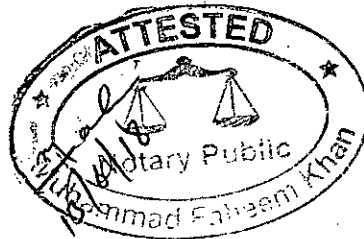
AFFIDAVIT

I, Liaqat ali shah S/O Syed Ghafoor Shah R/o Mohallah Saidan Village akbar pura Distt Nowshera, do hereby solemnly affirm and declare on oath that contents of the Condonation application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.



Appellant

17201-1948822-5



**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR**

Liaqat Ali Shah

VERSUS

Superintendent of Police Khyber Pakhtunkhwa Peshawar

ADDRESSES OF PARTIES

PETITIONER.

Liaqat Ali Shah S/O Syed Ghafoor Shah, R/o Mohallah
Syedan Village Akbar Pura District Nowshera.

ADDRESSES OF RESPONDENTS

1. Superintendent of police capital police Peshawar Khyber
Pakhtunkhwa, Peshawar.
2. Capital city police officer Peshawar Khyber Pakhtunkhwa,
Peshawar.
3. Inspector General of Police Peshawar Khyber Pakhtunkhwa
Peshawar

Dated: 13/06/2018

Petitioner/Appellant

Through

Sheraz Hussain

&

Mian Asif Aman

Advocates, High Court
Peshawar.

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR**

Liaqat Ali Shah

VERSUS

Superintendent of Police Khyber Pakhtunkhwa Peshawar

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth,

1. That the petitioner is filing the accompanying appeal the contents of which may graciously be considered as integral part of the instant petition.
2. That the petitioner had preferred departmental appeal period within one month from the impugned dismissal order, but the impugned order was not communicated to the appellant.
3. That delay in approaching this Tribunal was due to perusing the above mentioned reason which was neither intentionally, nor was under control of the petitioner.
4. That law also favour adjudication on merits and technicalities of any sort must always be ignored while reaching a just and fair disposal of any les.

5. That for proper disposal of the accompanying case on its merits, the Condonation of delay is indispensable.
6. That the impugned order of Respondent No. 1 is illegal unlawful and against the law.
7. That the appellant was dismissed from service a retrospective date, which is bed in the eyes of law and is void ab-initio.
8. That not only the petitioner has got a prima facie case and having balance of convenience in his favour, but would suffer irreparable loss, if the instant petition is not allowed.

It is, therefore, most humbly prayed that on acceptance of the instant petition, the delay in filing the accompanying appeal, may graciously be condoned and the accompanying appeal may very graciously be decided on its merits.


Petitioner/Appellant

Through


Sheraz Hussain

&

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

Mian Asif Aman

Advocates, High Court
Peshawar

Dated: 13/06/2018

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Liaqat Ali Shah

VERSUS

Superintendent of Police Khyber Pakhtunkhwa Peshawar

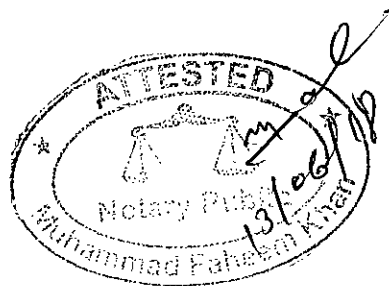
AFFIDAVIT

I, Liaqat ali shah S/O Syed Ghafoor Shah R/o Mohallah Saidan Village akbar pura Distt Nowshera, do hereby solemnly affirm and declare on oath that contents of the Condonation application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.



Appellant

17251-19482-5



Annex A (16) No 3184-OAS
2/7/85

(5)

ENLISTMENT ORDER.

Ex Recruit Const: Wahidullah son of Abdul Wahid
of village Wazir Khan .P.S Wazir Khan Tehsil Wazir Khan
District Wazir Khan is enlisted as Constable/T.S.,
temporarily in the N.P.S.NO 2 i.e. 260-6-302/7-365 Plus
Ration Allowance with effect from 1.7.85 and allotted
Constabulary No 1854

He is enlisted merely on temporary basis and his service would be liable to terminate any time without any notice.

Height 5-9

Chest 34 x 35 1/2

Age at the time of appointment 23-1-19

Years.

OB NO. 4128 / 4128 OB

Dated 2-7/1985

SUPDT OF POLICE HQRS.
'D' PESHAWAR.

Sheraz Hussain
SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

3200
4-7

Education
10th

166
3
P-34

2 نومبر 1996 تا 5 تا 9
25-7-96
27 تا 257
97

ابتدائی اطلاعی رپورٹ

115

نمبر و تفصیل درج کرو
نمبر 105/105
نمبر 216
نمبر 3

کوئٹہ
(فائل) ابتدائی اطلاعیت خرم قابل دست اندازی پولیس رپورٹ شدہ زبردنو 154 نمبر ضابطہ نوحداری
ضلع شانوار
تھانہ
تاریخ در وقت وقوع 6 مئی 1996

تاریخ و وقت رپورٹ	کے 20 وقت 10 13
نام و سکونت اطلاع دہندہ و مستغیت	عبدالرشید صاحب 540
مختصر کیفیت خرم امودنو، حال اگر کچھ لیا گیا ہو	427 499 148 353 324
جائے وقوع نامہ تھانہ سے اوزر کمت	دھوکہ پور روڈ کڈ دہشت گردی
نام و سکونت ملزم	نہ سیدنی ڈیڑھی
کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو تو وجہ بیان کر دو	نہ سیدنی ڈیڑھی
تھانہ سے روانگی کی تاریخ و وقت	6 مئی 1996

کارروائی جو برخلاف
مشتبہ گان مشنڈا
پر سن نام لپٹری ٹریٹ

ابتدائی اطلاعیت کے ذریعہ اطلاع دی گئی کہ ایک شخص نے ایک گاڑی چوری کی ہے۔ اطلاع دہندہ نے بتایا کہ گاڑی کا نمبر 427 ہے۔ اطلاع دہندہ نے بتایا کہ گاڑی کو چوری کرنے والے شخص کا نام سیدنی ڈیڑھی ہے۔ اطلاع دہندہ نے بتایا کہ گاڑی کو چوری کرنے والے شخص کا پتہ دھوکہ پور روڈ ہے۔ اطلاع دہندہ نے بتایا کہ گاڑی کو چوری کرنے والے شخص کا پتہ دھوکہ پور روڈ ہے۔ اطلاع دہندہ نے بتایا کہ گاڑی کو چوری کرنے والے شخص کا پتہ دھوکہ پور روڈ ہے۔

Sheraz Hussain
SHERAZ HUSSAIN
Advocate High Court Peshawar
0301-221, 222

مکتبہ اسلامیہ لاہور کے زیر نگرانی و اشرف مکتبہ عالیہ سے
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(13) Annex

(3)

OASINO 4014
22/10/07

Handwritten notes in Urdu, including the words "R. 2" and "دو دو".

Handwritten notes in Urdu, including the words "میں" and "تو".

Handwritten notes in Urdu, including the words "میں" and "تو".

Handwritten number: 184.07

* S No 2902
DATED 11-10-07

Allowed.
Signature
Superintendent of Police
Rural Divn: Peshawar.

Handwritten signature/initials

Handwritten signature/initials
20/10/07

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031042

NEW STANDARD Medical Laboratory

Opp. Dr. Mushtaq Ahmad Clinic
Akbar Pura

Ph: 091-5517459 Mob: 0301-3022990
0333-9128510



Consultant

Dr. Mohd Ali

M.B.B.S, D.C.P, H.M.C

Mohd Tariq Khan

Lab Technician H.M.C Pesh.

32

Annex - D
Mushtaq Ali Shah

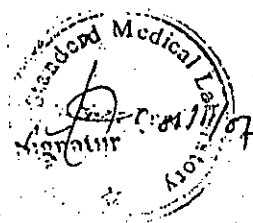
Sex: M

Ref by: Self

Test	Result
WBC	1/20
RBC	1/160
PLT	1/100
GLU	1/100

REMARKS: URINE TEST IS POSITIVE (TRAC)

Microscopic examination shows WBC seen in thick and thin smear.



Date 01.11.2007

Time 10:30

Elisa Facility is also available Now:.

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

Duaa Welfare

HOSPITAL

Chowk Sikandar Pura,

G. T. Road, Peshawar City.

Ph: 091-2565094



15

ویفیر ہسپتال

دعا

27

چوک سکندر پورہ جی ٹی روڈ پشاور شہر

Name Saad Liasat Alishah Age 17 Sex M Date 02-08-07

Clinical Record

Rx

%

Adv. Widal

Hbs Ag

HCV

R.B.S

Fever from 1 month

Motionless on 07/07

Levoflox 117 Injection 5ml

Had Pain

Epigastric pain

O/E Body alter

Tab. Savelox 500mg
1-1

T M

P

B

Adv. Complete bed rest
For 1 week
5 days

Tab. Pedral. extra
1-1

Sip. Spasmodin
11-11

Tab. Umihaf
1-1

CIPROX Tab 250/500mg

FEBAN-DS Tab

اوقات کار: 8:00 صبح 8:00 شام

یہ ادارہ محترم حضرات کے تعاون سے چلایا جا رہا ہے

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9931048

38

DUAA WELFARE HOSPITAL Duaa Welfare Organization

Chowk Sikandar Purā, G.T. Road, Peshawar Ph:2565094
Mob:0300-5849398



دعا ویلفیئر ہسپتال

چوک سکندر پورہ جی ٹی روڈ پشاور

Sheraz Hussain
SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-2231043

91

Patient's Name <i>Saad Liaquat</i> Age <i>42</i> Sex <i>Male</i> Date: <i>2/18/07</i>	
Specimen <i>Blood</i> Investigation Record <i>Widal Hbs Ag Hcv Hiv RBS</i>	
HEMATOLOGY	NORMAL
HEMATOLOGY	NORMAL
HB% G/dl	F12-16 m 14-18
ESR mm 1st hour	0 15
RBC /Cmm	2.5 4.5
TLC /Cmm	5000 10000
DLC	
Neutrophils %	45 75
Lymphocytes %	20 45
Eosinophil %	0 05
Basophils %	0 01
Monocytes %	0 05
Platelets Million/Cmm	1.5 4.5
Malaria Parasite	
Blood Group	
Rh Factor	
Brucella Agglutinins	
Hbs Ag	<i>NEGATIVE (-ve)</i>
HCV	<i>NEGATIVE (-ve)</i>
HIV	
Miratest Test	
Bleeding Time	0 07
Clotting Time	03 07
Prothrombin Time	
Fibrinogen Factor	
Kahn Test	
Amylase	
Bilirubin Total mg/dl	Upto 0.10
Bilirubin Direct upto	3.0mg
Bilirubin Indirect mg/dl	0.1-0.7
ALT (GPT) U/L	Upto 40
ALK Phosphatase U/L	Upto 35-100 ad -9-35/ch
Total Proteins G/dl	6.0 to 8.0
Albumin G/dl	3.0 to 5.0
Glubullin G/dl	2.0 to 3.0
Urea Mg/dl	15to 45mg
Creatinine Mg/dl	0.5-1.1 mg
I.ct	
Cholesterol Me/dl	286 mg
Triglyceride Me/dl	80-150 mg
Glucose Fasting Mg/dl	70-110mg
Glucose Randam <i>105</i> Mg/dl	100-150 mg
Uric Acid Mg/dl	M:2.5-5.0F:2.6-7 mg
Toxoplasmosis Mg/dl	
Widal Test <i>Positive (+ve)</i>	
TO <i>1/160</i> TH <i>1/320</i>	
AH <i>1/80</i> BH <i>1/80</i>	
ASO Tites	Up to 200IU

LAB IN CHARGE

OSINDO $\frac{3645}{1817107}$

17

46

گزارش میں شامل کوڈ نمبر 3645 جو یہ ہے اور شامل کرنے کو
کا قابل نہیں ہے اور عینہ معاملہ جاری ہے اور ڈائری 46
نے دست لایا ہے اور دیا ہے میں فیڈ میں ہے اور اسے

گزارش میں درخواست! کہہ کر تاہم اسے شامل کرنے
میں فیڈ میں ہے اور اسے (97) سے 97 سے منظور
کرنے کا حکم ہے اس کے مطابق

گزارش میں ہے

10-7-07

اللہ

گزارش میں ہے اور اسے 166 سے منظور کرنے
میں ہے

اللہ

allowed

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-923400
Peshawar
Punjab

O. D. No. 1979
Dated 10-7-07

گزارش میں ہے
میں ہے
4/2/07

Dr. Mian Muhammad Sadique
M.B.B.S., M.D.

ڈاکٹر میاں محمد صدیق

Akbar Pura Nowshera.
Mob: 0302-5513157, 0334-9033478

ایم۔ بی۔ ایس۔ ایم۔ ڈی

اکبر پورہ نوشہرہ

Name سر ساجد شاہ Age 17 Sex M Date 9/7/16

Clinical Record

Rx

- Paracetamol Tab

B.P.

177

- ofloxacim 400mg Tab

Temp

Puls

- Lysobex sup

2-2-2

Advised Bed Rest for
10 days

M.A. Marketing

Dr Sadique

Sheraz Hussain
SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

48

18

NEW STANDARD Medical Laboratory

Opp. Dr. Mushtaq Ahmad Clinic
Akbar Pura
Ph:091-5517459 Mob:0301-3022990
0333-9128510



19
47
Consultant

Dr. Mohd Ali
M.B.B.S, D.C.P, H.M.C
Mohd Tariq Khan
Lab Technican H.M.C Pesh.

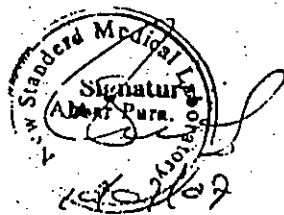
Name : *Mr. Sayyed Liaqat Ali Shah* Sex : *M*

Test Req: *Widal Mp Test* Ref by: *Self*

<u>Test</u>	<u>Result</u>
<i>TO,</i>	<i>1/20</i>
<i>TH,</i>	<i>1/160</i>
<i>AO,</i>	<i>1/20</i>
<i>AF,</i>	<i>1/160</i>

Positive (+ve)

Malarial Parsites : *No MP Seen In Thick and Thin Blood Smear.*



Date 10.07.2007

Time 8:12

Elisa Facility is also available Now..

Sheraz Hussain
SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-5031049

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME Olw...

YEARLY NO 48535

DATE 21-8-07

DISEASE Enteric fever

FACE VALUE RUPEES 5/-

Temp-102.0 F

(20)

Tab Augmentin
1 + 1 + 625 mg

Medical Superintendent
Police/Services Hospital
Peshawar.

Tab Magnopyrol
1 + 1 + 300 mg

Advised sick leave for

21-8-07 to 4-9-07.

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME W...

YEARLY NO 32918

DATE 5-9-07

DISEASE Enteric fever

FACE VALUE RUPEES 5/-

Temp-104.0 F

- Tab Taramid
1 + 1 + 200 mg

Medical Superintendent
Police/Services Hospital
Peshawar.

Tab Bonesta - jete
1 + 1 + 1 + 1 +

- Tab Optillets - M
1 + 1 + 1 + 1 +

Advised sick leave for (02) weeks up to 5/9/2007.

MEDICAL OFFICER
Police/Services Hospital
Peshawar.

(02)

SHERAZ HUSSAIN
Advocate High Court Peshawar
6300-9931048

DATE _____

FACE VALUE RUPEES 5/-

No. _____ Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME Sheraz Hussain

YEARLY NO 41653

DATE 21-7-07

DISEASE Enteric fever

(2)

Temp-104of

2 Tab Taramid 1+ 2ooms

Tab Ponstan 1+1+

Wintogero Cream 1+1+

Advised sick leave for
(15) fifteen days
wef 21/7/07

MEDICAL OFFICER
Police/Services Hospital
Peshawar.

Medical Superintendent
Police/Services Hospital
Peshawar.

No. _____ Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME Sheraz Hussain No. 116

YEARLY NO 45129

DATE 6-8-07

DISEASE Enteric fever

FACE VALUE RUPEES 5/-

Temp-103of

Tab Ciproxin 500mg 1+

Medical Superintendent
Police/Services Hospital
Peshawar.

Tab Paradol-Enter 1+1+

Tab Ofillets-M 1+

Advised sick leave for (15)
fifteen days
wef 6/8/07

MEDICAL OFFICER
Police/Services Hospital
Peshawar.

(15)

SHERAZ HUSSAIN
Advocate High Court Peshawar
6555-5555/43

23

ATD
OUT-PATIENTS DEPARTMENT.
YEARLY NO 69903
DATE 24/11/2007
DISEASE Enteric Fever

FACE VALUE
Rs. 5/-

- Tab Ciproxin 500mg
1+1

- Tab Paradol
1+1+1

Advised sick leave for
01 one week wef
24/11/2007

Superintendent
Police Services Hospital
Peshawar.

MEDICAL OFFICER
Police Services Hospital
Peshawar.

No. 11921
Rs. 5/-
OUT-PATIENTS DEPARTMENT.

NAME Mr. W. W. 166

YEARLY NO 87289

DATE 17/11/2007

DISEASE Enteric Fever

FACE VALUE RUPEES 5/-

- Tab Tacindol 200mg
1+1

- Tab Konstan-jeto
1+1+1

Advised sick leave
for 01 one week wef

17/11/2007

MEDICAL OFFICER
Police Services Hospital
Peshawar.

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9931043

No. Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME..... *E. S. W*

YEARLY NO. *20508*

DATE..... *1-12-2007*

DISEASE *Enteric Fever*

FACE VALUE RUPEES 5/-

Temp - 103.0 F

- Tab Tacandol 200mg
1+

- Tab Ponstan
1++

- Tab Optilets - M
1+

Advised sick leave for

(01) one week

wef 1/12/07

Medical Officer
Cellso, H.C. Hospital, Peshawar

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

DATE.....

No. Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME..... *E. S. W 1666*

YEARLY NO. *71831*

DATE..... *8-12-2007*

DISEASE *Fracture leg*

FACE VALUE RUPEES 5/-

- Tab Voltan 50mg
1+

- Tab Dalsan
1+

- Tab Optilets - M

وہ ڈی جی ایچ ہسپتال

(349)

P.T.O.

(23)

OUT-PATIENTS DEPARTMENT.

No. _____ Rs. 5/-
NAME *[Signature]*
YEARLY NO. *15-5-99*
DATE *8-3-2008*
DISEASE *U-T-I*

FACE VALUE RUPEES 5/-

Temp - 104°F

(24)

- Tab Neokine *1+1*
- Syz Citralba *2+2+2*
- Tab Ronstan *1+1+1*

Advised sick leave for
(15) fifteen days
wef 8/3/2008

MEDICAL OFFICER
Police Services Hospital
Peshawar.

OUT-PATIENTS DEPARTMENT.

MB. *En. Col. Lt. N. 166*
YEARLY NO. *42154*
DATE *20.6.2008*
DISEASE *Enteric Fever*

FACE VALUE RUPEES

(15)

Temp - 104°F

Tab Tacomid *200mg*

- Tab Ronstan *2+2+2*

- Tab Optillets - M *1+1*

used sick leave for
1 week
20/6/2008.

MEDICAL OFFICER
Police Services Hospital
Peshawar.

[Signature]
SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

No.

Rs, 5/-

OUT-PATIENTS DEPARTMENT

NAME *Liagat Shah* 166

YEARLY NO. *35118*

DATE *23-5-2008*

DISEASE *Enteric fever*

FACE VALUE RUPEE

Temp-1040F % Nausea
Vomiting
Headache

③ - Tab Talamid 200mg
1+

- Tab Graminate 1+1+

- Tab Bonestan 2+2+2
③ P.T.O

OUT-PATIENTS DEPARTMENT

NAME *Liagat Shah*

YEARLY NO. *40597*

DATE *13-6-2008*

DISEASE *Enteric fever*

Pain @ foot

FACE VALUE RUPEE

Temp-1030F

- Tab Talamid 200mg
1+

- Tab Voltaren 30mg
1+

Advised sick leave for ①
one week wef
13/6/08

MEDICAL OFFICER
Police Services Hospital
Peshawar.

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

FITNESS ②

This is to certify
that Mr Liagat
Shah is physically
fit to resume
normal duties wef
12/7/2008

MEDICAL OFFICER
Police Services Hospital
Peshawar.

FACE VALUE RUPEES 5/-

No. Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME & I.D. NO. 166

YEARLY NO. 1688

DATE 8-1-2008

DISEASE fracture L

FACE VALUE RUPEES 5/-

Dr. Nadeem Jate

Lab. Calicut

Lab. Theertham - M

348

28

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

FACE VALUE RUPEES 5/-

Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME Dr. Colli

YEARLY NO. 1394

DATE 8-7-2008

DISEASE Enteric Fever

Temp - 103.2 F

Lab. Faraid 200mg
147

Lab. Faraid
24.2+2

Admitted sick leave for
two weeks

02

Aug 27/6/2008

MEDICAL OFFICER
Police/Serv. Hospital
Peshawar

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME *Mr. M. A. H. S.*

YEARLY NO. *8576*

DATE *8-2-2007*

DISEASE *Fracture (L)*

Ankle joint

Enteric fever

Temp - 10.4° F

FACE VALUE RUPEES 5/-

- Tab *Valthron* 50mg
1 + 1

- Tab *Neurobion*
1 + 1

- Tab *Ponstan* - *forte*
1 + 1

- Tab *Talamid* 200mg
1 + 1 P.O

347

SHERAZ HUSSAIN
Advocate High Court Peshawar
0900-8021048

[Signature]

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME *Mr. M. A. H. S.*

YEARLY NO. *64512*

DATE *23-11-07*

DISEASE *Enteric fever*

Temp - 10.4° R

FACE VALUE RUPEES 5/-

- Tab *Talamid* 200mg
1 + 1

Medical Officer
Police Services Hospital
Peshawar
Ponstan
1 + 1

- Tab *Opillets - M*
1 + 1

Advised sick leave for

02 two weeks w.e.f

3/11/2007

Medical Officer
Police Services Hospital
Peshawar
[Signature]

31

27

67

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME. *Shahid Ali*

YEARLY NO. *67823*

DATE. *27-10-2007*

DISEASE. *Enteric Fever*

Temp-103.0 F

FACE VALUE RUPEES

33

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-8131948

28

Medical Superintendent
Police/Services, Hospital,
Peshawar.

Tab Taramid
1+ 200mg

Tab Paracetamol
1+1+1

Tab Opilllets-M
1+

Advised sick leave for

one week

wef 27/10/2007

MEDICAL OFFICER
Police/Services Hospital
Peshawar

NO.

Rs. 5/-

OUT-PATIENTS DEPARTMENT.

NAME. *Shahid Ali*

YEARLY NO. *67823*

DATE. *20-10-2007*

DISEASE. *Enteric Fever*

Temp-103.0 F

Tab Taramid
1+ 200mg

Tab Paracetamol
1+1+1

Tab Opilllets-M
1+

Advised sick leave for

one week wef

20/10/2007

MEDICAL OFFICER
Police/Services Hospital,
Peshawar

FACE VALUE RUPEES 5/

34

39 Rs. 5/-

OUT-PATIENTS DEPARTMENT

NAME
YEARLY NO. 58945
DATE 05-10-2017
DISEASE Enteric Fever

FACE VALUE RUPEES 5/-

29

T.M.P. 101 F
Di. Fruit / M

TS. TARIQ

Medical Superintendent
Police/Services, Hospital
Peshawar.

Mushu

Susea T

ADU

slip for 02 two all...
if signed by MS
Medical Officer
Police/Services, Hospital, Peshawar.

SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

No. Rs. 5/-

OUT-PATIENTS DEPARTMENT

NAME
YEARLY NO. 55825
DATE 20-9-2007
DISEASE Enteric Fever

FACE VALUE RUPEES 5/-

Temp = 103.0 F

c/c Nausea
Vomiting
loss of
appetite

- Tab Talamid 1+ 200ms

- Tab Pongstan - forte 1+1+1+

- Eyo Mosegor - V 2+2+2

W. C. C. P-10

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT,

NAME *Sh. M. W. / 166*

YEARLY NO *19028*

DATE *22.3.2008*

DISEASE *Mumps*

Sciatica (L) leg

FACE VALUE RUPEES 5/-

- Tab Voltaren 50mg
1+1

- Tab Neurobion
1+1

- Wintogerm Cream
1+1+1

Advised sick leave for *(01)*
one month
wef 22/3/2008

MEDICAL OFFICER
Police Services Hospital
Peshawar.

(30)

Sheraz Hussain
SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT,

NAME *Sh. M. W. / 166*

YEARLY NO *28376*

DATE *22.4.2008*

DISEASE *Mumps*

Sciatica both legs

FACE VALUE RUPEES 5/-

- Cap Feldene 20mg
1+1

- Tab Benidox
1+1

- Wintogerm Cream
1+1+1

Advised sick leave for *(03)*
three weeks
wef 22/4/08

MEDICAL OFFICER
Police Services Hospital
Peshawar.

31

DUA WELFARE HOSPITAL
 Dua Welfare Organization

Bank Sikandar Pura, G.T. Road, Peshawar Ph:2565094
 Tel:0300-5849358



دعا ویلفیئر ہسپتال

چوک سکندر پورہ جی ٹی روڈ پشاور

Patient's Name: Saad Iqbal Age: 42 Sex: Male Date: 2/8/07
 Investigator: Blood Investigation Record: Widal, HbsAg, Hcv, RBS

HEMATOLOGY		NORMAL		HEMATOLOGY		NORMAL	
ESR	G/dl	12-16	4-18	Kahn Test			
Urea	mm 1st hour		15	Amylase			
WBC	/Cmm	2.5	4.5	Bilirubin Total	mg/dl	Upto	0.1.0
RBC	/Cmm	5000	10000	Bilirubin Direct	upto	3.0mg	
Hb	%	45	75	Bilirubin Indirect	mg/dl	0.1-0.7	
Hct	%	20	45	ALT (GPT)	U/l	Upto	40
MCV	%	0	05	ALK Phosphatase	U/L	Upto	35-100 ad -9-35/ck
MCH	%	0	01	Total Proteins	G/dl	6.0 to 8.0	
MCHC	%	0	05	Albumin	G/dl	3.0 to 5.0	
Platelets	Million/Cmm	1.5	4.5	Globulin	G/dl	2.0 to 3.0	
Widal Test				Urea	Mg/dl	15to 45mg	
ASO Tite				Creatinine	Mg/dl	0.5-1.1 mg	
ASB Tite				I.ct			
ASD Tite				Cholesterol	Mg/dl	280 mg	
ASL Tite				Triglyceride	Mg/dl	80-150 mg	
ASM Tite				Glucose Fasting	Mg/dl	70-110mg	
ASD Tite				Glucose Randam	Mg/dl	100-150 mg	
ASL Tite				Uric Acid	Mg/dl	M:2.5-5.0F:2.6-7 mg	
ASD Tite				Toxoplasmosis	Mg/dl		
ASL Tite				Widal Test		"Positive" (+ve)	
ASD Tite				TO	1/150	TH	1/320
ASL Tite				AH	1/80	BH	1/80
ASD Tite				ASO Tites			Up to 200/1

"Negative" (-ve)
 "Negative" (-ve)

LAB INCHARGE

Sheraz Hussain
SHERAZ HUSSAIN
 Advocate High Court Peshawar
 0300-9031048

Annex-E ORDER

32

Constable Liaqat Ali No.166 while posted to posted to Police Station Daudzai absented himself from his lawful duty without any leave or prior permission with effect from 20.7.2007 till to date (at about one year). It means that he did not take keen interest in his official duty.

In this regard a proper departmental proceeding was initiated against the delinquent Constable Liaqat Ali No.166 and SDPO/Saddar Circle was appointed as enquiry officer. During the course of enquiry the accused official Constable Liaqat Ali No.166 was summoned to the office by the enquiry officer time and again to record his statement. But the accused official badly failed to appear before the enquiry officer and deliberately absented from his lawful duty till to date. The Muharrir PS/Daudzai stated in his statement that the accused official is habitual absentee & did not take keen interest in his official duty. The accused official Constable Liaqat Ali No.166 was found guilty of the charge leveled against him and also recommended for major punishment by the enquiry officer.

Subsequently he was issued a Show Cause Notice; his reply to the Show Cause Notice was received and found un-satisfactory. It means that he did not take keen interest in official duty and also wasting time.

Therefore he is hereby dismissed from service from the date of his absence i.e. 20.7.2007 under N.W.F.P, Removal from Service (Special Powers) Ordinance V/2000.


SUPERINTENDENT OF POLICE RURAL
CAPITAL CITY PESHAWAR


OB; No. 1949

DATED 14.7. /2008

NO. 537-92 /PA, Dated Peshawar the 16-7 /2008

Copies forwarded for f/o information to:-

1. The Capital City Police Officer Peshawar.
2. The Senior Superintendent of Police Operations Peshawar.
3. The Superintendent of Police Headquarters Peshawar.
4. Pay Officer.
5. CRC.
6. FMC.


SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9931048

خدمت خراب چیت کیس کی پولیس سپاڑ
درخواست دربارہ مکانی سپرو

DSP-L
Comments
YMN

۷۷۰
۲

خا- مالی
موردانہ گزارش ہے کہ میں سیکڑل سن ۱۹۸۵ کو جمع کر لیا
میں سلور کا ٹیبل جوئی ہوا۔ اب تک جمع مدرس بغیر سفارت
کے سرکل تقانون میں رگور جنرل ڈیوٹی انجام دی ہے اچھا
خاصا خزانہ میٹرک سائنس میں ہاں میں اے دن جی ون

19
31/7/01

ماں ہوں - سال ۱۹۹۶ میں تھانہ پھو میں مقیمات
تھانہ ڈاکوؤں کیس کو متاثر ہے میں شدید زخمی ہوا اور
اس طرح میرا رت خون خارج ہوا اور شدید پھیلا بھی
خرچ ہوا۔ یہ علاج معالجہ میں نے این بیوی کے زہور بھیج
کر اور حالدار بھیج دیا۔ جمع پولیس کی طرف سے کسی قسم
کے اسرار یا اوصاف افزائی یا دوسرے نہیں ہوگی اور اس کے بعد
بوجھ دیکھی خون مجھے آثر ڈاٹیفائیڈ رہتا ہے، اور مہر بھی
کمر آتا ہے

No 2073-L
1-8-c
۷۷۰

Fotc
LPC
Patup
Beem

خا- مالی، اب چونکہ تھانہ داندلی میں مقیمات تھانہ مجھے
تھانہ سڈیوگنا - سابقہ SP مدد کریم خان صفحہ ۲ میں
حالت دیکھو مجھے ڈاکو صفحہ ۱ میں تھے عطا بق بالترتیب 3 ماہ
لدہا دن صید بکل سرکی جنٹوری دی بعد میں موجودہ SP مدد
نگلش نے میری انگوائری DSP صدر سرحل عزیز خان کو
بارت کر دی لیکن میں اس دوران کمروری کے باقی ماہوں
میں جسٹس کی پادوں سرک ہو گیا اور دستہ DSP صدر سڈیوگنا

Kull
4/9/01

SHERAZ HUSSAIN
Advocate High Court Peshawar
03001048

لیدر انھوں نے میرے طرف ہر قسم کا مذاق نہیں لکھو دیا۔
 اور اس طرح ۹۲ رولز نے میرے تمام میڈیکل نوٹس (38)
 سرٹیفکیٹ جس 3 ماہ اور 1 دن منظور شدہ جس کے
 ریکارڈ آئیڈ پروانہ جاتا ظاری موقع سے لہذا نفاذ ہوا
 میں آئے باوجود ایک سال بلا تنخواہ کمر دیا۔ اور دوسرا
 نوٹری سے بھی نکال دیا۔ یہ سب سب سے پہلے بلوغت
 کے تحت لکھا گیا۔ لہذا مجھے 3 ماہ تک نوٹس سے وفاداری کا
 صلہ دیا گیا۔

جس پر عالیٰ میں ایک آپ صاحب سے، ازور ایمپل کرنا، اور
 صلہ سروں جس میں خصوصیت اور دستاویزوں علی میں۔ زخمی
 ہو گیا، ہوں اگر آپ صاحبان میڈیکل ایڈریٹس یا میڈیکل میں دینے تو
 میڈیکل نوٹس منظور کریں۔ یا کو لائف نوٹس شمار کریں اور تنخواہ
 دینے کا حکم صادر فرمائیں، میرا کوئی دوسرا چارہ نہیں کا
 نوٹری ہوں جس میں زیادہ تر ہند میڈیکل سٹوڈنٹ گاہے۔ خود داروں
 سناؤ نہیں ہوں آپ بھی میرے سب سے پہلے میں اگر نوٹس
 میری نوٹری بحال کرنے اور صلہ تنخواہیں ریٹرن کرنے کا حکم
 صادر فرمائیں، تاکہ آپ صاحبان کیسے دعا گو رہیں
 اللہ اعلیٰ

آپ کا نائب امینار کابینہ سیدہ لکھتے علی شاہ بھنگا۔ صلہ
 آئیڈ (38)
 آئیڈ لہذا 3 ماہ سیدہ لکھتے
 نوٹس

Annex G (35)

ORDER

(i) This office order will dispose off departmental appeal of ex-constable Liaquat Ali Shah No.166 who was awarded the major punishment of dismissal from service under the NWFP, Removal from Service Special Powers Ord:2000 by SP/ Rural vide OB No.1949 dated 14.7.08, on the charge of deliberate absence from lawful duty w.e.f.20.7.08 till his dismissal order i.e. 14.7.08(11 months and 24 days)

(ii) Proper departmental proceedings were initiated against him and SDPO Saddar Circle was appointed as the E.O. who found him guilty of the allegations. He failed to attend the departmental proceedings. The E.O. initiated exparte proceedings and recommended him for award of major punishment. Show Cause Notice was issued to him to which he replied. The same was perused by the competent authority and found unsatisfactory, hence awarded him the above major punishment.

(iii) I have gone through the relevant record and heard him in person. The record reveals that though he was sanctioned medical w.e.f.21.7.07 to 19.10.07(2 months and 16 days) by the then SP/Rural vide OB No.2613 dated 11.9.07 and OB No.2902 dated 11.10.07, but on expiry of medical leave he did not report for duty and remained absent from 20.10.07 till his dismissal. i.e. 14.7.08.(8 months and 24 days). To cover his absence period he again got medical leave from 20.10.07 to 11.6.08(7 months and 21 days) without observing legal formalities.

(iv) In view of the position explained above, the allegations stand proved against him. He has remained absent for a long time. Moreover, Non-association of the appellant with the Enquiry Proceeding reflects conduct and disinterest/indifference to official duties. He has 37 bad entries and 06 minor punishments on his credit. Hence keeping over all service record and conduct of the appellant, the appeal is rejected/filed and he is stand dismissed from service w.e.f.20.10.07


CAPITAL CITY POLICE OFFICER,
166 PESHAWAR.

No. 2705-9 /PA dated Peshawar the 18-10-08
Copies for inf and n/a to the:-

- 1/ SP/ Rural Peshawar
- 2/ PO/OASI
- 3/ CRC along with S.R. for making necessary entry.
- 4/ FMC with complete FM
- ✓ 5/ Official concerned.


SHERAZ HUSSAIN
Advocate High Court Peshawar
0300-9031048

قیمت
50 روپے



41465

ایڈوکیٹ: شہراز حسین برہکوتہ

بار کونسل ایسوسی ایشن نمبر: BC-10-7778

رابطہ نمبر: 0300-9031048

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سر جسٹس سید شہزاد گل خان اور

مخانب: سائل / اپیلٹ	دعویٰ: راجی
بیعتہ عدالتہ و درمید غفور شاہ	علت نمبر:
بنام	مورخہ:
سید نذرت بیگم / سید شہزاد گل خان	جرم:
و عدالت	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
آن مقام پر کیلئے شہراز حسین + عدالت اعلیٰ + عدالت اعلیٰ + عدالت اعلیٰ + عدالت اعلیٰ
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ 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: 13-6-2018

Accepted

Accepted

SHEHZAD HUSSAIN
Advocate High Court Peshawar
0300-9031048

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

Mohd
Accepted

کس وقت سے لکھا گیا ہے

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.

Service Appeal No.201/2018.

Liaqat Ali Ex-Constable No. 166 Peshawar.....Appellant.

VERSUS.

1. Superintendent of Police, HQrs:, Peshawar.
2. Capital City Police Officer, Peshawar.
3. Provincial Police Officer, KPK, Peshawar.....Respondents.

I N D E X

S.NO	DOCUMENTS	ANNEXURE	PAGE NO
1	Memo of comments	---	1-3
2	Affidavit	----	4
3	Copy of charge sheet	-A	5
4	Copy of allegation	B	6
5	Copy of inquiry report	C	7
6	Copy of FSCN	D	8

(B)

From: The Deputy Superintendent of Police,
Sadder Circle Peshawar.

To : The Superintendent of Police,
Rural Peshawar.

No. 47-E /SC, dated Peshawar the 17-6- /2008.

Subject: DEPARTMENTAL ENQUIRY.

MEMO:


Kindly refer to your office endst: No.230/S, dated 7.4.2008 on the above subject (attached).

It is submitted that the constable Liaqat Ali No.166 while posted at Police Station Daudzai, absented from lawful duty without any leave or prior permission with effect from 20.7.2007 till to date. The said constable was served with the charge sheet and departmental enquiry was initiated against him. The undersigned was appointed as Enquiry Officer.

In this connection statement of the MHC PS/Daudzai was recorded which is enclosed for perusal and the defaulter constable was also summoned time and again for statement but he did not bother to appear the enquiry proceedings while constable is still absent from duty w.e.f 20.7.2007 (summons attached).

Enquiry reveals that the constable absented himself from lawful duty without prior permission of his seniors. Taking ex-part action, the accused official is hereby declared guilty.

Submitted please.


(AZIZ-UR-REHMAN)
DEPUTY SUPERINTENDENT OF POLICE,
SADLER CIRCLE PESHAWAR.

B

8

No. 2301/PA
7-11-2008

**DISCIPLINARY ACTION AGAINST CONST: LIAQAT ALI NO.166 OF
POLICE STATION DAUDZAI**

I **NASIR-UL-MULK BANGASH**, Superintendent of Police Rural Capital City Peshawar, as competent authority am of the opinion that you **CONSTABLE LIAQAT ALI NO.166** has rendered himself liable to be proceeded against as he committed the following act within the meaning of Section-3 of the NWFP, removal from Service (Special Ordinance-V/2000.

STATEMENT OF ALLEGATIONS

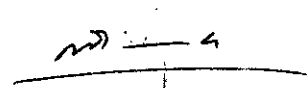
That he while posted to Police Station, Daudzai absented himself from his lawful duty without any leave or prior permission with effect from 20.7.2007 till to date, It means that he did not take keen interest in his official duty.

He thus, rendered himself liable for disciplinary action.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and **MR.AZIZ-UR-REHMAN SDPO/SADDAR CIRCLE** is appointed as Enquiry Officer.

3. The Enquiry Officer shall, in accordance with the Provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record its findings and within 7-days of the receipt of this order, make recommendations as to punishment or other appropriate action against the accused.

4. The accused and well conversant representatives of the department shall join the proceedings on the date time and place fixed by the enquiry officer.


SUPERINTENDENT OF POLICE RURAL
CAPITAL CITY PESHAWAR

Received



7-11-2008

D

(2)

SHOW CAUSE NOTICE

I NASIR-UL-MULK BANGASH, Superintendent of Police Rural Capital City Peshawar, as competent authority under NWFP, Removal from Service (Special Powers) Ordinance V/2000 do hereby serve you **Const: Liaqat Ali No.166 of Police Station Daudzai.**

No. 230/BA
5-7-08

- 1) The consequent upon the completion of enquiry against you by Enquiry Officer SDPO/Saddar Circle for which you are given opportunity of hearing and producing evidence.
- 2) On going through the finding of enquiry Officer submitted vide Memo:No.47-E/SC, dated 17.6.2008. The material on record and other connected papers including your defense for the said enquiry officer.
- 1) I am satisfied that you have committed the following acts/commissions specified in section-3 of the said ordinance.
 - a) That he while posted to Police Station Daudzai absented himself from his lawful duty without any leave or prior permission with effect from 20.7.2007 till todote. It means that he did not take keen interest in his official duty.
- 2) As a result thereof, I am competent authorities have tentatively decided to impose upon you major/minor punishment under section-3 of the said Ordinance.
- 3) You are therefore required to Show Cause as to why the aforesaid penalty is not impose upon you and also intimate as to whether you desire to be heard in person.
- 4) If no reply to his Notice is received with in 7-days of the delivery, it shall be presumed that you have no defense to put in and in that case ex-part action shall be taken against you.

Received

Liaqat

5-7-08

M. A.
SUPERINTENDENT OF POLICE RURAL
CAPITAL CITY PESHAWAR

A

9

CHARGE SHEET

I **NASIR-UL-MULK BANGASH**, Superintendent of Police Rural, Capital City Peshawar as competent authority hereby charge you Constable **Liaqat Ali No.166** of Police Station Daudzai.

- a. Not taking no keen interest in his official duty.
- b. While posted to Police Station Daudzai absented himself from lawful duty without any leave or prior permission with effect from 2-7-2007 till to date. It means that he did not take keen interest in his official duty.

2. By reasons of the above, you appear to be guilty of misconduct under section -3 of the NWFP (Removal from Service) Special Powers, 2000 and have rendered yourself liable to all or any of the penalties specified in Section-3 of the Ordinance.

3. You are therefore require to submit your written defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.

4. Your written defense if any, should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-part action shall follow against you.

Intimate whether you desire to be heard in person.

Sd/AA
SUPERINTENDENT OF POLICE RURAL
CAPITAL CITY PESHAWAR.

PC

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

Service Appeal No.201/2018.

Liaqat Ali Ex-Constable No, 166 Peshawar.....Appellant.

VERSUS.

1. Superintendent of Police, HQrs:, Peshawar.
2. Capital City Police Officer, Peshawar.
3. Provincial Police Officer, KPK, Peshawar.....Respondents.

Reply on behalf of Respondents No. 1, 2, & 3.

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS.

1. That the appeal is badly time barred.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has not come to this court with clean hands.
4. That the appellant has no cause of action.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant concealed the material facts from Honorable Tribunal.
7. That the appellant got no locus standi and cause of action to file the instant appeal.

FACTS:-

- 1- Para No.1 pertains to record hence needs no comments.
- 2- Para No.2 is totally incorrect and denied on the ground that the appellant is a habitual absentee and not interested in lawful duty. The appellant earned in his service 37 bad entries and 06 minor punishment. It is worth to mentioning here that the present appeal is badly time bared.
- 3- Incorrect. The appellant while posted to Police Station Daudzai absented himself from his lawful duty w.e.f 20.07.2007 to 14.07.2008 (Total 11 Months & 24 Days). In this regard he was issued charge sheet and statement of allegations. SDPO/Saddar Circle was appointed as Enquiry Officer. During the course of enquiry the appellant was summoned time and again to attend the enquiry proceedings, but he failed to appear before the enquiry officer. The muharrir PS Daudzai stated in his statement that the appellant is habitual absentee and did not take keen interest in his official duty. Upon the findings of enquiry officer he was issued final show cause notice, which he received and reply but his reply was found unsatisfactory. After fulfilling all codal formalities the appellant was awarded major punishment of dismissal from service. (Copy of charge sheet,

statement of allegations, enquiry report, and final show cause notice are at annexure "A" "B" "C" "D").

- 4- Para No.4 is incorrect. The appellant absented himself wilfully without taking leave/permission, and was enjoying his long absence period without prior permission. The charges of deliberately absence were stood proved against him. So he was proceeded lawfully and was awarded major punishment of removal from service.
- 5- Para No.5 is incorrect and denied. The appellant is a habitual absentee, and not interested in his lawful duty.
- 6- Incorrect. Proper charge sheet and statement of allegations were issued to him. SDPO/Saddar was appointed as enquiry officer. The enquiry officer summoned him time and again but he did not turn up. After fulfilling all codal formalities he was awarded the major punishment of removal from service.
- 7- Incorrect. The appellant filed departmental appeal which after due consideration was filed/rejected on the ground that the appellant is a habitual absentee.
- 8- Incorrect. The appellant absented himself for a long time. The appellant have a blemish service record, he earned in his service 37 bad entries and 06 minor punishment. Keeping overall service record and conduct the appeal was filed/rejected.
- 9- Para No. 9 is totally incorrect and based on misleading material. Appellant was summoned in the orderly room (OR) before the disposal of his departmental appeal by the appellate authority and after due consideration his appeal was rejected/filed on reasonable grounds. Actually appellant was well aware of rejection of his departmental appeal and his plea for not informing him about outcome of his appeal is a lame excuse as a sufficient long time of more than 10 years has been lapsed. Therefore the appeal is not maintainable under the law. That appeal of the appellant being devoid of merits may kindly be dismissed on the following grounds.

GROUND:-

- A- Incorrect. The punishment order is just legal and in accordance with law/rules.
- B- Incorrect. The appellant deliberately absented himself from his lawful duty.
- C- Incorrect. Proper departmental enquiry was conducted against him. He summoned time and again to appear before the enquiry officer, but he did not turn up.
- D- Incorrect. The punishment order is per the law/rules.
- E- Incorrect. The appellant is a habitual absentee and not interested in lawful duty.

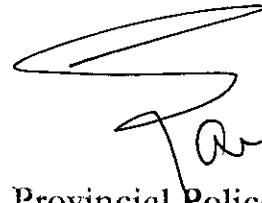
F- Incorrect. The appellant deliberately absented himself from his lawful duty.

G- Incorrect. The appellant was treated as per law/rules.

H- That respondent may also be allowed to advance any additional ground at the time of hearing of the appeal.

PRAYERS:-

It is therefore most humbly prayed that in light of above facts and submissions, the appeal of the appellant being devoid of merits, legal footing may be dismissed.



Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.



Capital City Police Officer,
Peshawar.



Superintendent of Police,
HQrs., Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.

Service Appeal No.201/2018.

Liaqat Ali Ex-Constable No. 166 Peshawar.....Appellant.

VERSUS.

1. Superintendent of Police, HQrs:, Peshawar.
2. Capital City Police Officer, Peshawar.
3. Provincial Police Officer, KPK, Peshawar.....Respondents.

AFFIDAVIT.

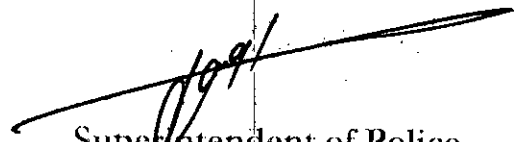
We respondents 1, 2 &3 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Honorable Tribunal.



Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.



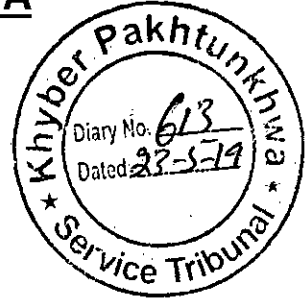
Capital City Police Officer,
Peshawar.



Superintendent of Police,
HQrs:, Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service appeal No. 201/2018



Liaqat Ali Shah

VS Superintendent of Police Khyber
Pakhtunkhwa, Peshawar etc

*Deal up to the
code department
original order.*

REJOINDER ON BEHALF OF THE APPELLANT

Soneta 23/5/19
Respectfully Sheweth,

Preliminary objection

Recdly

All the preliminary objection raised by the respondents/ department are incorrect and baseless and not in accordance with law and rules. Rather the respondents were estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS

1. Para No.1 and 2 of the appeal is correct while departmental reply is incorrect, there is no bad entries, minor punishment or absentees on part of the appellant and no any proof or record available with the comments of respondents/ department regarding the allegation which was leveled against the appellant.
2. Para No. 3 of the appeal is correct while reply is incorrect, No opportunity of defense has been provided to the appellant and the respondent not fulfilled the cordial formalities and passed the impugned order, which is illegal, unlawful and void.
3. Para No. 4 of the appeal is correct while reply is incorrect and vehemently denied. The appellant properly moved an application for leave on 8.10.2007, which was properly allowed by the respondent/ department.
4. Para No. 5 of appeal is correct. While reply is incorrect
5. Para No.6 of appeal is correct. While the reply is incorrect.

6. Para No. 7 of the appeal is correct while reply is incorrect and the departmental appeal has been rejected on no good grounds.
7. Para No. 8 and 9 appeal is correct, that the appellant is having more than 22 years service and during performing his duty the appellant confronted with notorious criminals during exchange of fire and received bullet on his leg but in response the department given penalty to the appellant which was dismissed from service, which is very harsh on one and the impugned appellate order on dated 18.10.2008 has been communicated to the appellant on 1.6.2018.

Grounds.

All the grounds of the appeal are correct while reply is incorrect because no charge sheet and statement of allegation has been issued and communicated to the appellant. No statement of muharar PS Daud zai has been recorded by the inquiry officer, no opportunity of cross examination has been provided to the appellant, no regular inquiry has been conducted by the respondent/ department, no opportunity of personal hearing has been provided to the appellant, which is a clear cut violation of Rule 5 (a) (c) of **Removal from Service Ordinance 2000**. The impugned order is also void because it has been passed from retrospective effect order and passed without fulfilling cordial formalities.

It is, therefore humbly prayed that the appeal of the appellant may kindly be accepted in the light of the instant rejoinder.

Through

Appellant

Sheraz Hussain
Advocate

High court, Peshawar

AFFIDAVIT

I Liaqat Ali shah S/O Ghafoor shah do here by solemnly affirm and declare on oath that contents of this rejoinder are true and correct to the best of my knowledge and nothing has been concealed from this Honorable Tribunal.



Deponent

Liaqat Ali Shah