S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.			
1	2	3			
		<u>Present.</u> Mr. Muhammad Abdullah Balouch, For appellant Advocate			
		Mr. Noor Zaman Khattak, District Attorney, For respondents.			
	25.11.2021	Vide our detailed judgment in connected Service Appeal			
	;	No. 1090/2016, titled "Muhammad Zubair Vs. Commandant,			
		F.R.P Khyber Pakhtunkhwa, Peshawar and others", the appeal			
		in hand is dismissed. However, in order to prevent the			
		multiplicity of proceedings and abuse of process of Tribunal it is			
		apt to exercise jurisdiction under Rule 27 of the Khyber			
		Pakhtunkhwa Service Tribunal Rules, 1974 to direct the			
:		respondents to process the case of promotion of police officers			
		posted in FRP, in accordance with law, without delay. Parties			
		are left to bear their own costs. File be consigned to the record			
	· .	(AHMAD SULTAN TAREEN)			
		CHAIRMAN (Camp Court D.I.Khan)  (SALAH-UD-DIN)  Member(J) (Camp Court D.I.Khan)			
	· -	<u>ANNOUNCED</u> 25.11.2021			

23.11.2020

Appellant present through counsel.

Muhammad Jan learned Deputy District Attorney for respondents present.

A request for adjournment was made as issue involved in the present case is pending before Larger Bench of this Tribunal. Adjourned. To come for arguments on 25.01.2021, before D.B at Camp Court DI.Khan.

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

Camp Court, D.I Khan

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

To 24. 3. 2021 for the fame. The

24.03.2021

Muhammad Abdullah Baloch, Advocate, for the Mr. appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

A request for adjournment was made as issue involved in the present case is pending adjudication before Larger Bench of this Tribunal. Adjourned. To come up for arguments before D.B at Camp Court D.I.Khan on 27.07.2021.

(MIAN MUHAMMAD) MEMBER (EXECUTIVE) CAMP COURT D.I.KHAN

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

17-07-21

to non-availability of bench, advoushed to 25:11.21.

Due to COVID-19 the case is adjourned. To come up for the same 22/4/2020 at Camp Court, D.I Khan



コ / 4/2020

Due to COVID-19 the case is adjourned. To come up for the same  $\frac{24}{4}$ / $\frac{4}{2020}$  at Camp Court, D.I Khan



24.09.2020

Counsel for appellant present.

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

Former requests for adjournment as issue involved in the present case is pending before the Larger Bench of this Tribunal.

Adjourned to 23.11.2020 before D.B at Camp Court D.I Khan.

(Atiq-ur-Rehman Wazir)

Member (E)

Camp Court, D.I Khan

(Rozina Rehman) Member (J)

Camp Court, D.I Khan

28.01.2020

Clerk of counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondents present. Clerk of counsel for appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned to 25.02.2020 for arguments before D.B at Camp Court D.I.Khan.

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

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

25.02.2020

Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 26.03.2020 before D.B at camp court D.I.Khan.

Member

Member

Camp Court D.I.Khan

26.02.2020

\*Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 26:03.2020 for arguments before D.B at Camp

Court D.I.Khan.

(Mian Mohammad)

Member

Camp Court D.I.Khan

(M-Amin Khan Kundi)

Member

Camp Court D.I.Khan

25.06.2019

Junior counsel for the appellant and Mr. Farhaj Sikandar, District Attorney for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Case to come up for arguments on 27.08.2019 before D.B at Camp Court D.I.Khan.

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

27.08.2019

Counsel for the appellant and Mr. Farhaj Sikandar, District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 21.10.2019 for arguments before D.B at Camp Court D.I.Khan.

(Hussain Shah)

Member

Camp Court D.I.Khan

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

21/10/2019 Since tour to D.I.Khan has been cancelled .To come for the same on 26/11/2019.

26.11.2019

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 28.01.2020 for arguments before D.B at Camp Court D.I.Khan.

(Hussain Shah)

Member

Camp Court D.I.Khan

(M. Amin Khan Kundi)

Member

Camp Court D.I.Khan

25.03.2019

Counselor for others appellant appelland fan Fanhaifa Sikandar, Birtriat Attorney for other grap productive spresent.

The Dae unto tigeneis a create therefthe calase of a Kanyberd to Paland Make where the obnesia the obnesia temperature, D.I. Kanyberd to 25.03.2019 for arguments before D.B at camp court, D.I. Khan.

Member Member

Chairman Camp Court, D.I.Khan Camp Court, D.I.Khan

25.03.2019

Counsel for the appellant and Mr. Farhaj Sikandar, District Attorney for the respondents present.

The court time is over, therefore case adjourned to 23.04.2019 before the D.B at camp court, D.I.Khan.

Member

Chairman Camp Court, D.I.Khan

23.04.2019

Clerk of counsel for the appellant and Mr. Farhaj Sikandar, District Attorney for the respondents present. Due to strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Adjourn. To come up for arguments on 25.06.2019 before D.B at Camp Court D.I.Khan.

(M. Amin Khan Kundi)

Member

Camp Court D.I.Khan

(M. Hamid Mughal)

Member

Camp Court D.I.Khan

28.11.2018

Counsel for the appellant Mr. Malik Hussain, Advocate present and submitted Vakalat Nama on behalf of the appellant. Vakalat Nama is placed on record. Mr. Usman Ghani, District Attorney on behalf of the respondents present and submitted written reply, copy of the same is handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, and arguments on 18.12.2018 before D.B at Camp Court D.I.Khan.

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

18.12.2018

As per direction of the worthy Chairman Khyber Pakhtunkhwa Service Tribunal, D.I.Khan tour dated 18.12.2018 has been rescheduled and the case is re-fixed for 27.12.2018.

Reader

27.12.2018

Counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney for the respondents present. Learned counsel for the appellant submitted rejoinder requested for adjournment for arguments. Adjourned. To come up for arguments on 22.01.2019 before D.B at Camp Court D.I.Khan.

(Hussain Shah)

Member -

Camp Court D.I.Khan

(Muhammad Amin Khan Kundi)

Member

Camp Court D.I.Khan

15.03.2018

Counsel for the appellant and Mr. Ziaullah, DDA for respondents present. Written reply not submitted despite last opportunities. Requested for further adjournment. Last opportunity further extended subject to payment of cost of Rs. 500/- which shall be borne by respondents from their own pockets. To come up for written reply on 28.06.2018 before S.B at camp court D.I.Khan.

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

MAN TO S

28.06.2018

Tour is hereby cancelled, Therefore the case is adjourned for the same on **60**:0**8**:2018 before S.B.

Reality Camp Court D. I Khan

**0**0.0**%**2018

Appellant present in person. Tour is hereby cancelled. Therefore the Case is adjourned for the same on 11.09.2018 before S.B.

Real Camp Court IST K

11.09.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Representative of the department is not in attendance therefore, learned Deputy District Attorney is directed to contact the respondents for filing of written reply on the next date positively. Adjourned. To come up for written reply/comments on 28.11.2018 before S.B at Camp Court D.I.Khan.

(Muhammad Amin Khan Kundi) Member

Camp Court D.I.Khan

29.12.2017

Clerk of the counsel for appellant present. Mr. Farhaj Sikandar, District Attorney for the respondents also present. Representative of the department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on 25.01.2018 before S.B at Camp Court D.I.Khan.

(Muhammad Amin Khan Kundi) Member

Camp Court D.I. Khan

25.01.2018

Appellant with counsel present. Mr. Farhaj Sikandar, District Attorney for the respondents also present. Representative of the department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively by way of last chance. Adjourned. To come up for written reply/comments on 15.03.2018 before S.B at Camp Court D.I.Khan.

(Muhammad Amin Khan Kundi) Member

Camp Court D.I. Khan

Mr. Muhammad Anwar Awan learned counsel for appellant present. Preliminary arguments heard. The promotion was granted to appellant Mr. Faisal Nawaz was taken back and he was reverted without any proper inquiry and procedure. He has been condemned unheard and in this course they have challenged the impugned orders.

Point raised needs consideration, the appeal is admitted for regular hearing. The appellant is directed to deposit the security and process fee within 10 days there-after notices be issued to the respondents for written reply/comments for 26.07.2017 before S.B at Camp Court D.I.Khan.

Appellant Deposited Security & Process Fee

> (ASHFAQUE TAJ) MEMBER

Camp Court D.I.Khan

26.07.2017

Counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney for official respondents also present. Representative of the respondent-department is not in attendance, therefore, notice be issued to the respondents with the direction to direct the representative to attend the court on the next date positively. Adjourned. To come up for written reply/comments on 23.10.2017 before S.B at Camp Court D.I.Khan.

(Muhammad/Amin Khan Kundi)
Member

Camp Court D.I. Khan

26.10.2017

Appellant in person present. Mr. Farhaj Sikandar, District Attorney for the respondents present. None present on behalf of the respondent department. Notice be issued to the respondent department. To come up for written reply on 29.12.2017 before S.B at camp court D.I.Khan

(Muhammad Hamid Mughal)
Member

Camp Court D.I.Khan

# Form- A FORM OF ORDER SHEET

Court of	: <u> </u>	
Case No.	1092/2016	

	Case	No. 1092/ <b>2016</b>
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	25/10/2016	The appeal of Mr. Faisal Nawaz received today by
1		post through Muhammad Anwar Awan Advocate may be
		entered in the Institution Register and put up to the Worthy
		Chairman for proper order please.
		REGISTRAR
2-		This case is entrusted to Touring S. Bench at D.I.Khan for
		preliminary hearing to be put up there on 29.11.16.
		<b>A</b> 1
		CHARMAN
	28.11-16	Since D.I.Khan tour dated 28.11.2016 has been.
		cancelled, therefore, case to come up for preliminary hearing on
		22.02.2017 before S.B at Camp Court D.I.Khan.
	,	Reader
	"	
1	.] .	

# BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR CAMP COURT D.I.KHAN.

Appeal no. 10.9.7 of 2016.

Faisal Nawaz

**VERSUS** 

Commandant FRP & Others

# **INDEX**

No.	Particulars :	Annexure	Pages
1	Appeal	-	/-3
2	Copy of order dated: 19-04-2016	A	4
3	Copy of Pay Roll	В	5
4	Copy of Order 26-08-2016.	C	6
5	Copy of departmental appeal and order	D	7-8
6	Wakalat Nama	E	9

Your humble Petitioner

Faisal Nawaz

Dated: 22.10.2016

Mohammad Anwar Awan Advocate Supreme Court.



# BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR CAMP COURT D.I.KHAN.

Appeal no.109.7. of 2016.

Faisal Nawaz No.701/FRP, D.I.Khan Range D.I.Khan.

Khyber Pakhtukhwa Service Tribunai

Diary No. 1121

#### **VERSUS**

- Commandant Frontier Reserve Police Khyber Pakhtunkhwa Peshawar.
- 2. Superintendent of Police FRP D.I.Khan Range D.I.Khan.
- 3. Government of KPK through Secretary Interior Khyber Pakhtunkhwa Peshawar.

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT AGAINST ILLEGAL CANCELLATION ORDER DATED: 28.06.2016 ON THE BACK OF APPELLANT.

That the brief facts of the case are as under:

- 1. That the appellant is serving in the Frontier Reserve Police Department and deputed in FRP D.I.Khan Range as a constable since 2006.
- 2. That appellant was promoted to the rank of head constable with immediate effect on 19-04-2016 by respondent No.02 having good Filed to performance, clean record and passed his courses of civil defence etc.

  Copy of order dated: 19-04-2016 is annexure A.
  - That after promotion order, the appellant took the charge, which was duly entered in his service book and appellant received the pay of head constable. Copy of pay roll is annexure B.
    - 4. That respondent No.01 without giving any notice and conducting inquiry, issued letter dated: 28.06.2016 in the absence of appellant by cancelling his promotion as head constable along with others with retrospective effect. Copy of order is annexure C.

pleased to declare the order dated: 28.06.2016 being illegal, void and without lawful authority and has no legal effect and appellant may kindly be reinstated at the post of head constable with all back benefits.

#### YOUR HUMBLE APPELLANT

٠,

- That feeling aggrieved after communication of above said illegal order on 20-08-2016, appellant filed departmental appeal dated 26-08-2016 which was also rejected. Copy of departmental appeal and order are Annexure D.
- 6. That order in appeal is communicated to appellant on 06.10.2016, so feeling aggrieved from above said action appellant is constrained to approaches this honorable court on the following amongst other:

#### **GROUNDS**;

- 1. That the appellants are not treated in accordance with law and the actions of the respondents are malafide besides being discriminatory and harsh.
- 2. That respondent No .02 according to rules promoted the appellant after considering application for promotion. The appellant was appointed as constable on 31.05.2006, during his service he passed five course of civil defense and also pass A-1 course and became senior most constable in FRP D.I.Khan range. The promotion order of appellant was in accordance with law and rules framed by the government which was dually implemented and respondent No.01 has no authority to cancel the same without giving any notice or opportunity of hearing.
- 3. That standing order 2 of 2016 does not restrict the respondent No.02 to not promote the appellant and any irregularity committed by authority does not harm the appellant in any manner.
- 4. That appellant is not being penalized without giving them any opportunity of hearing nor has given any show cause notice by the department, which is against the principal of natural justice.

In view of the above, It is, therefore, most respectfully prayed that on acceptance this appeal this honorable court may

### ORDER.

Constable Faisal Nawaz No. 701/FRP, (Old SPL), of this FRP Range is hereby promoted to the Rank of Head Constable (BPS-07) and allotted Head Constabulary No. 7141/FRP, & Posted in Platoon No. 164 FRP Police Line D.I.Khan.

Superintendent of Police, FRP, D.I.Khan Range, D.I.Khan.

No. 772-73 /FRP, Dated of D.I.Khan / / /04/2016.

Copy of above is sent to the:-

- 1. Pay Officer FRP D.I.Khan.
- 2. OHC/SRC FRP D.I.Khan.

VAR AWAN Advocate Superintendent of Police, FRP, D.I.Khan Range, D.I.Khan.

0B 415

At 18.04 10/6

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VGI : COLLECTED DE

En en energe

ORDER

promotion of following officials to the rank of Head Constables which were made in volition of standing order No.2/2016 is hereby cancelled with retrospective offect.

S No	I Manual Carrier		
1 3 140	Name of Official	Promotion Order	Dated
' '		Book	
1	Muhammad Zubair Not 7125	390	215.04.2016
2	Malik Fida Hussain No.7214	388	15.04.2016
3	Muhammad Waseem Nd.7171	392	15 (04.2616
	The American Control of the Control	٠,	
	Islam Ullah No.7120	394	15.04.2016
	Qayoum Nawaz No. 7129	413	18,04,2016
6	Muhammad Nadeem No 7±34	429	19.04.2016
	Khalid Naveed No.7148	437	19.04.2016
	Muhammad Ramzon No.7127	396	15.04.2016
9 .	Foisal Nawaz No.7141	415	18.04.2016

Consmandan
Frontier Reserve Police
Khyber Pakhtunkhwa/Poshawar

/EC, dated Peshawar the, 28 106 /2016.

Copy of above is forwarded to the SP FRP DI Khan Range for necessary

OHC/OB/SRC/PO

MANWATAWA

03/6/3/2016

SPJGAT DING

1/3/8

1/6

..... 6.2 The Caroline 0.37 719/101 1028 FELFANNES - TON 518 - 184 - 1865 - 1865 - 1865 1. 5 - Judice 1 - 5 80 87 40 Jonal N Do Opomood (915 8 3 - 1 20 m - 5622 A Solding Light of the Salding Harry स्मेर्सर: -3102.80 9Z على أوارش بموليا كي المواجد لا في المراجد المراكب المراكب المراكبة المنافعة المنافع ن والمرابع المرابع الم - الأخوال كالمريدة في المريدة ا ( 6.02/2016 المالية المسائلية المرافعة المسائلية المرافعة المالية المرافعة المسائلية المرافعة الرفيار وشركا الأنبيل المنظم المواجعة والمعاني العالا 20 101 1016 المنظم المراجعة المراجعة المراجعة المراجعة ا テントではなるからからかいとうできればいまですのではあまれてまた ٥٥/١٥٥١ في الكي بجريد المرابة الإن المنافعة المنافعة (٥٥/١٥٥ من المالية المنابعة المنافعة المن المشروب المراجعة والمعالمة المراجعة الم ·安二、大学になるようでしている。それでいるない。 こうかのはなずで、ろうとうのではまりというにの場合でした そんなみからしいしいというないないないというないないかられている الا المائية بخزاية المالية はんのからからればいるのく

A joint application submitted by the following lower subordinates of FRP DI Khan Range DI Khan stating therein that on the basis of courses and seniority, they were promoted to the rank of Head Constable.

<b>(1)</b>
ig is a
NAME OF
.,

Now vide this office order No.5477/EC, dated 28.06.2016 they were reverted back to the rank of Constables as their promotion orders were made in-violation of standing order No. 2/2016.

At last they had prayed for setting aside their reversion orders.

Submitted for kind order please.

MY LOU OF WY

Office Supdt:

es Sanster Santa

na grit i seri

Commandant FRP KP

Ryenta

### VAKALATNAMA

IN THE COURT OF KPK Service Tribunal D.I.KHAN.

Faisal Nawaz

VERSUS commondant /

TITLE	Affeal	
I/WE	Affealant	
the above named :	Faibul Nawaz	hereby appoint

## MUHAMMAD ANWAR AWAN ADVOCATE SUPREME COURT, D.I.KHAN

in the above Captioned Case to all or any of the following Acts Deeds & Things.

- ✓ To Appear, Act & Plead for Me/Us in the above mentioned cases in this Court/Tribunal in which the same may be tried or heard or any other proceedings out of our connected therewith.
- ✓ To Sign, Verify, File OR Withdraw all Proceedings, Petitions, Appeals, Affidavits, Applications for Compromise OR Withdrawals OR for the Submission of Arbitration of the said case OR any other Documents may be Deemed Necessary OR Advisable by them by the Conduct, Prosecution OR Defense of the above case at all its stages.
- ✓ To Receive Payments, Issue Receipts for all moneys that may be OR Become Due & Payable to us during the course on Conclusion of the Proceedings.
- ✓ To do all other Acts & Things, Which may be Deemed Necessary OR Advisable during the course of Proceedings.

#### AND HEREBY AGREE:

- To Ratify Whatever Advocates may do the Proceedings.
- Not to Hold the Advantages Responsibilities if the said case be proceed Ex-parte OR Dismissed in Default in Consequence of their Absence from the Court when it is called for Hearing.
- > That the Advocates shall be entitled to withdraw from the Prosecution of the said case if the Whole or any part of the Agreed Fee Remain Un-Paid.
- > That Advocates may be Permitted to argue any other point at the time of Arguments.

In Witness Whereof I/We have signed this Vakalatnama here under the Contents of which have been Read/Explained to Me/Us which is fully understood by Me/Us.

Dated: \_\_\_\_\_

Faisal Navas

Accepted By:

SIGNATURE OF EXECUTANT (S)

MUHAMMAD ANWAR AWAN

way pdi

**ADVOCATE SUPREME COURT** 

Phone Office: 0966-730828 Cell No: 03339962231

# BEFORE THE K.P.K SERVICE TRIBUNAL PESHAWAR

S.T.A	No			0010
O.1.II	MO.	•	:	2018

MUHAMMAD ZÜBAIR

#### **VERSUS**

COMMANDANT F.R.P & OTHERS

#### REJOINDER TO THE COMMENTS OF RESPONDENTS

Respectfully Sheweth,

#### REPLY TO PRELIMINARY OBJECTION.

- 1. The Para of Respondents is incorrect. Thus the Para is denied the appeal id filed within time.
- 2. That Para of Respondents is incorrect. The Appellant has impleaded all necessary party in the instant Appeal.
- 3. The Para of Respondents is incorrect. The Appellant is an aggrieved person. Thus Cause of accrued to him.
- 4. That Para of Respondent is incorrect. The Respondents have not been explained the un cleanliness of the Appellant.
- 5. The Para of Respondents is incorrect. No any estoppels have been explained by the Respondents.
- 6. The Para of Respondent is also incorrect. The Appellar chave put the factual and correct position in the Appeal.

### REPLY TO FACTS COMMENTS OF RESPONDENT.

- 1. That the respondents have accepted the Para of Appeal. Thus need no further comments.
- 2. Appellant have been correctly genuinely promoted by the Department. The plea of the Respondents that the Promotion have been made due to an oversight inadvertently is incorrect and un justified. Thus the Para is denied.
- 3. That the Para No.3 of Respondent is incorrect. The Appellant has been promoted as head Constable according rules and policy and Standing order. Thus the plea of Respondents rehumently denied.
- 4. That the Para 4 of the respondent is incorrect. The Appellant have been promoted by the department and in this connection no any Charge Sheet, Statement of Allegation have been issued to the concerned Official, who violated the rules and regulation (if any). However the Appellant may not be

punished on the fault / flaws of the Respondents thus the Para as vehumently denied.

- 5. That Para No 5 of the Respondents is incorrect. The Appeal of the Appellant was liable to be accepted. As he was reverted from Head Constable.
- 6. That Para No 6 of the Respondent is incorrect. No any unclean lines have been explained by the Respondent in his comments. Thus Para 6 of the Respondent is denied.

# REPLY TO GROUNDS OF COMMENTS OF RESPONDENT.

- 1. That Para No.1 of respondents is incorrect. Their plea that the orders have been issued in hasty manner. But in this connection no any Charge Sheet, Explanation Call, enquiry have been conducted. The Promotion have been made according Standing order. Thus the action and omission of the Respondents is illegal, un lawful and without lawful authority. They were required to punish their own staff who violated the standing order if any. The Para of the Respondents is vehumently denied:
- 2. That the Para of respondent is incorrect. The Appellant have due right for promotion and he was promoted according rules and laws. That no any violation has been done in promotion of the Appellant. He was correctly and due to his right he was promoted.
- 3. That the Respondents No.2 is competent to Promote the Appellant to the Post of Head Constable. Thus Para No. 3 of comments is vehiumently denied.
- 4. That Para No. 4 is incorrect. The Appellant had due rights who have been promoted. Thus no any violation of standing orders has been made. Thus Para is denied.

In wake of submission made above it is humbly prayed that the Appeal of the Appellant may kindly be accepted with all back benefit as prayed in the heading of Appeal.

Your Humble Appellant.

Muhammad Zubair.

### **AFFIDAVIT**

I, Muhammad Zubair S/O Muhammad Taqi R/O Moballah Wakeelan Wala D.I.Khan Constable FRP D.I.Khan do hereby solemnly affirm and declare on oath that the contents of the reply to comments are true and correct to the best of my knowledge and belief and nothing has been conceased.

DEPONENT











