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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

In Service Appeal No. 1907/2022

**Khyber Pakhtunkhwa
Service Tribunal**

Mr. Sibghatullah , Junior Clerk (Ex-Senior Clerk),
DPO. Bannu.

Diary No. 8594

Dated 25-10-23

.....(Appellant)

VERSUS

1. The inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Additional Inspector General of Police HQrs, Khyber Pakhtunkhwa, Peshawar.
3. The Regional Police Officer Bannu Region Bannu.

.....(Respondents)

.....
APPLICATION FOR PLACING ON FILE CERTAIN DOCUMENTS ATTACHED HERewith THE APPLICATION FOR PERSUAL OF COURT AND TO MEET THE END OF JUSTICE.

RESPECTFULLY SHEWETH:

1. That the above mentioned appeal is pending before this august Tribunal and fixed for today.
2. That, the appellant wants to place the certain documents to meet the ends of justice and fair decision.
3. That the attached documents with the present application are necessary for justice and fair conclusion to clarify the position further.

It is, therefore, most humbly prayed that the application may be allowed and the attached documents may please be considered as part and parcel of the appeal to meet the ends of justice and to reach the fair conclusion. Any other remedy which august Court deems

fit and appropriate that may also be awarded in favour of
appellant.


Applicant/Petitioner
Sibghatullah

THROUGH:


SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKUWA SERVICE TRIBUNAL,
PESHAWAR.

In Service Appeal No. 1907/2022

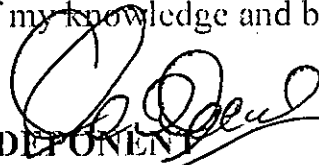
Sibghatullah

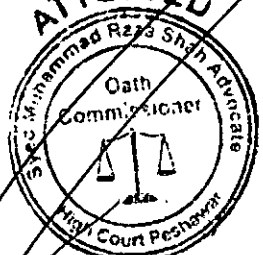
V/S

Police Deptt.:

AFFIDAVIT

I, , do hereby solemnly affirm and declare that the contents of the Application are true and correct to the best of my knowledge and belief.


DEPONENT


ATTESTED
Syed Muhammad Raza Shah Advocate
Oath Commissioner
High Court Peshawar

REFERENCE ATTACHED P.U.C

Legal opinion

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R/Sir

It is submitted that a self-explanatory application in r/o Sher Akbr Khan SDFO Sub Division Wazir Bannu requesting therein for release of his pay, was entrusted to me for legal opinion and final decision.

After perusing the service record and other testimonial of the applicant, it was transpired that in this regard a detail report has already been submitted in your good honour. However, a consolidated report is re-submitted for kind perusal and further orders as under please.

The applicant was initially appointed as Khassadar in 1977 and later on, he was appointed as Lance Naik in BPS-06 on contract basis w/e from 18.04.2011 as per laid down procedure.


On 28.10.2014, in DPC meeting held in the office of Deputy Commissioner Bannu, the applicant was promoted in BPS-7 along with his other colleagues. Furthermore, the applicant was awarded honorary shoulder promotion as Naib Subedar BPS-11 in the year 2014. In the service record of the applicant also depicts that entries have been made year wise service renewal of contract service.

According to Regularization Act 2009 section (3) "All employees including recommendees of the High Court appointed on contract or ad-hoc basis and holding that post on 31st December, 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post. Provided that the service-promotion quota of all service cadres shall not be affected".

So far as the release of pay of the applicant is concerned the pay officer of this office may kindly be directed to approach office of the District Account Officer Bannu to ascertain the reason for the stoppage of pay of the applicant. Furthermore, the applicant is entitled to get salaries as per rules/ policy, please.

Report is submitted please.


Inspector Legal Bannu

Allowed
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SECTOR No. 07

Senior Commander: -Mr. Sher Akbar Circle Officer SDW Bannu. (0333-9586012)

Mobile teams	Transit Team	Total Police Personnel
43	05	120

Sub-Sectors:-

Wazir Tehsil:- SI Haj Ali Shah SHO Utmanzi (Sub-sector commander) (0335-8383004)

Name Of UC	Mo bil	Tra	asi	Name, No. & Mobile No.				Supervisory Officer	
Gurbuz	13	1		H C	Irfanullah, 36 34 03021446474	1.	HC	Noor Zaman, 032290370 63	ASI Hikmat Ullah Police Line 0336-0711113
				F C	FC Fati Ullah 3604 SDW Gunner Of Hikmat 0349- 2647288				
				F C	SHfi U Rehaman ,3418 0305-1550088	2.	FC	Naqibulla h, 334883809 6	
				F C	Noor Dyaz, 5025507 8 0334-8858277	3.	FC	Samiullah, 033554613 63	
				F C	Zahid Ullah, 5023778 0 (0332- 9597502)	4.	FC	Rahman Ullah, 307 6 SDW TDP Camp (0334- 8811062)	
				F C	Rafi Ullah, 3359 0335- 58381208	5.	FC	Sadiq Noor, 5023 7899 (0331- 9119896)	
				F C	M. Kasim, 372 5 0333-4618693	6.	FC	Wasim Ullah, 322 8, 0322- 9139200	
				H C	Twaklati Khan, 3259, 03339726009	7.	FC	Khob Nawaz 3103, 03351928 390	
				F C	Wasimullah s/o awtay Khan	8.	FC	M. Amin, 032196371 61	
	H C	Sher Abdullah, 03061460381	18.	FC	Inayatulla h, 033397459 36				
ROCHA									

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APC along with 04 QRF Mobile Vehicles will also perform duty in the area	1. ASI Muhammad Riaz Police Lines 2. FC/Dri: Umer Niaz 540 MT Staff (0334-8817532) 3. FC Syed Ali Shah 703 Police Liens (0332-9721186) 4. LHC Abdul Qadir 340 Police Lines (0332-9975112)
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SECTOR No. 06

Sector Commander: -Mr. Sher Akbar Circle Officer SDW Bannu. (0333-9586012)

Wazir Tehsil:- ASI Hassan Gul SHO Ahmadzai (Sub-sector Commander) (0335-9703151)

Mobile teams	Transit Team	Total Police Personnel
29	03	90

Sub-Sectors:-

Name Of UC	Mobile	Transit	Name, No. & Mobile No.					Supervisory Officer	
Daryoba	10	1	1	FC		20	ASI	Husn Ul Moab, 03085332860	ASI Ashraf Hussain PS Ahmadzai (0333-0259182)
			2	FC	Misbah Ullah, 3116 03119272018	21	FC	Noor Aslam, 3497,	
			3	FC	Sairullah, 3038, 03438868344	22	FC	Baitullah, 3111, 0334091377	
			5	FC	Tariq Khan.589722,Ps Wazir (0335-9248760)	1	FC	Saadullah, 3445	
			6	FC	Rahmanullah, 03348720726	24	FC	Shaukat, 3040	
			7	FC	Zinzargul, 03426943684	25	FC	Habib Rahman 3517	
			8	FC	Naimatullah,03 359597801	26	FC	Ashiqullah, 3155 . 03352729329	
			9	HC	Muzamel Shah 3197, 03155306917	27	FC	Qismat Ali,3497 3443000358	
			10	FC	Mir Sali 3362 03359364320	28	FC	Altaf Hussain 3132, 3315959293	
			11	FC	Noor Shahgul, 3603, 03329732931	29	FC	Wahidullah, 3398, 03379759164	
			12	FC	Farhad Alam, 03327456690	30	FC	Sadam Hussain, 3426, 3345546367	
			13	FC	Jan Muhammad 3369	31	ASI	Hamayun Khan, 0332-8383487	
			14	FC	Sher Hassan, 3381, 03329665779	32	FC	Asim Khan 3424, 03329002708	
			15	FC	M. Ruman 3643, 03321573989	33	FC	Arshad Khan 3385, 03323107541	
			16	FC	Khater Khan, 3644 , 03329095193	34	FC	Hafizullah, 3375, 03360984307	
			17	FC	Najib Ullah, 3642, 03359737513	35	FC	Rahman ullah, 50380084 SDW PP Baghnato (0334-8720726)	
			18	FC	Ghani Rahman,	36	FC	Samiullah 3501,	

ایسا ذوق حکم جاقی جو ہم منشیات فروشان یا وہ کامین ادوہ (ایک) فریڈرہ مکن کی
 پتے پر مکرہ و پاشن کے اندر پیا پیا کی بیچے سے پلا سکر شاپر پر ننگ
 مری موش۔ جس میں ہر ہر مری۔ جو ہر موقع ہر وقت و جھیل سکیں فزون
 - 3040 گرام آفری پورہ جس سے سلیپ پر منتقل (ایک) ایک سلیپ و
 گوم دوسرا سلیپ فزون کرنے پر 1015 گرام جبکہ تیسرا سلیپ فزون
 گرام آفری پر ایک سلیپ سے ہر موقع $\frac{10}{75}$ گرام جس میں چارہ ایک ہتھیار
 کیجے۔ جبکہ پہلے سلیپ بقایا جس میں 1000 گرام ہتھیار و اسل پترو، دوسرے
 پہلے جس میں 1005 ہتھیار و اسل پترو جبکہ تیسرا سلیپ بقایا جس میں
 ہتھیار و اسل پترو کیجے۔ گودیاں فزون سے ہر موقع تکمیل ضروری ہوگی
 تفریح، و ضیق، رقت محمد پسران آدم خان سنکے انڈیز کے
 171 اصول 10¹⁰ / 19¹⁰ جرم 302/34 قناتہ ڈومیل میں بحر مان اشتہار
 اور عدالت کی جان کی گرفتاری روپوشی دیکھ کر اس کے بعد
 ہر سناہ شکل صیب لگان 194 لکھنؤ قناتہ (ایک) مقدمہ فزون
 مہتر کو موقع پر بھیجا جاوے میں ہم آفری پوری ہر موقع موجود
 اور مری حقیرا مکن 5110 قناتہ سیا ڈوٹری فزون 16 کا روٹی قناتہ
 حرام مسلم پتروہ شکل و رتہ جرم بحرمان چاک پوکر قتل FIR
 حوام BBI سناہ کی جان کے ہر گزوشن کے سبب

SI/SDW/BN4
 16/10/19

دستخط

عہدہ

اطلاع کے نیچے دہندہ کا دستخط ہو گیا کسی مہر یا نشان لگایا جائیگا اور اسے تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔
 حروف الف ب سرخ روشنائی سے بالقابل نام ہر ایک ملزم یا شہر علی الترتیب واسطے باشندگان علاقہ غیر یا وسط ایشیا یا افغانستان

نوٹ