23.4.2015

Appellant with counsel, Addl. AG with Ghulam Mustafa, Inspector for the official respondents and junior to counsel for private respondents No. 5 to 12, 14 to 17, 21, 23, 30 and 40 present. Arguments of the learned counsel for the appellant heard. The Leader counsel for private respondents is not present because of illness of his father being hospitalized. Addl. AG also requested for time to argue the case alongwith counsel for private respondents. As such case is adjourned to 15.5.2015 for further arguments.

**MEMBER** 

**MEMBER** 

15.05.2015

Appellant with counsel, Mr. Usman Ghani, Sr.GP for the official respondents and junior to counsel for private respondents present. Counsel for the private respondents is not available due to unavoidable circumstances. To come up for arguments either verbally or written on 20.5.2015.

MBER

BER

**MEMBER** 

21.05.2015

Appellant with counsel (Mr. Abdul Shakoor Khan, Advocate), Mr. Muhammad Adeel Butt, Addl. A.G for the official respondents and counsel for private respondents (Mr. Muhammad Asif Yousafzai, Advocate) present. Arguments heard. Record perused. Vide our detailed judgment of to-day in connected Service Appeal No. 405/2014, titled "Muhammad Amjad Versus Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar etc." this appeal is also remitted to the P.P.O Khyber Pakhtunkhwa, Peshawar as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 21.05.2015

MEMBER

6.2.2015

Appellant with counsel, Mr. Muhammad Jan, GP with Ghulam Mustafa, Inspector for the official respondents No. 1 to 4 and counsel for private respondents No. 5 to 12 present. Written replies of respondents No. 1 to 12 already received. Private respondent No. 14 present who submitted that he will contest this appeal. Private respondents No.19 & 34 in person present and submitted written reply and supported case of the appellant. Private respondents 25, 27.32, 33, & 45 sent their replies and supported case of the appellant. Other respondents have been served but not present, hence placed ex-parte. The learned counsel for the appellant submitted that he does not want to submit any rejoinder and requested that the case may be fixed for arguments. Therefore, case to come up for arguments on 02.3.2015. In the meanwhile private respondent No. 14 is directed to submit his reply, if any, before the date fixed.



2.3.2015

Appellant with counsel, Mr. Usman Ghani, Sr.GP with Ghulam Mustafa, Inspector for the official respondents and Mr. Muhammad Asif Yousafzai, Advocate for private respondents No. 5 to 12 present. He also appeared on behalf of private respondents No. 14, 15, 16, 17, 21, 23, 30, and 40, submitted wakalatnamas on their behalf and requested for setting aside exparte proceedings dated 6.2.2015 against them and relied on the written reply already submitted by him. As such ex-parte proceedings against above said respondents are set aside. The learned Member-II of the D.B is busy in Bench-III, therefore, case is adjourned to 23,4.2015 for arguments either verbally or written.

EMBER

15.12.2014

Clerk to counsel for the appellant, and Mr. Muhammad Adeel Butt, AAG with Abdul Qayum, S.I(Legal) for the official respondents and clerk to counsel for private respondents present. The Tribunal is incomplete. To come up for the same on 19.1.2015.

19.1.2015

Appellant with counsel, Mr. Muhammad Adeel Butt, AAG for the official respondents and Mr. Muhammad Asif Yousafzai, Advocate for private respondents No. 5 to 12 present. It was pointed out that no further order about respondents No. 13 to 45 has been issued. Since the appellant has made them respondents, therefore, it is necessary to issue them notices. In view of their number, notice be served upon them through DPO, Tor Ghar to be directed and that after services of the respondents, compliance report be submitted to this Tribunal. To come up for written reply of private respondents No. 13 to 45, on 6.2.2015.



22.08.2014

Counsel for the appellant and Mr. Kbeerullah, Asstt. A.G with Abdul Qayum, SI on behalf of official respondents and counsel for private respondents No. 5 to 12 present. The learned Member is on leave, therefore, case to come up for the same on 10.09.2014.

#### 10.09.2014

Counsel for the appellant, Mr. Muhammad Adeel Butt, AAG with Abdul Qayum, SI (L) for official respondents and junior to counsel for private respondents No. 5 to 12 present. The learned Member is on leave. To come up for the same on 11 30.09.2015.

MEMBER

#### 30.09.2014

Counsel for the appellant, Mr. Muhammad Adeel Butt, AAG with Abdul Qayum, SI for the official respondents present and reply on main appeal filed. Junior to counsel for private respondents No. 5 to 12 present who already filed written reply. Counsel for the appellant does not want to file rejoinder and requested that the case may be fixed for arguments on main appeal. To come up for arguments on main appeal on 15.12.2014. 14.5.2014

12.6.2014

Appellant with counsel, Mr. Muhammad Jan GP and Counsel for the private respondents present. Counsel for the appellant wants to argue the stay application. Counsel for the private respondents stated that actually the case was fixed for 12.6.2014, and he received no notice for hearing the application to-day. Therefore, case to come up for written reply on main appeal as well as reply/arguments on stay application on 12.6.2014.

MEMBER

MEM

MEN

EMBER

MEMBER

MEMBER

Counsel for the appellant, AAG with Shad Muhammad, R.I for official respondents and Mr. Muhammad Asif Yousafzai, Advocate/counsel for private respondents No. 5 to 12 present and Wakalatnama placed on file. None is available on behalf of other respondents. Fresh notices be issued to them positively. To come up for written reply on main appeal as well as reply/arguments on stay application on 09.7.2014.

9.7.2014.

Appellant in person, Mr. Muhammad Jan, GP for official respondents present and requested for time to contact them. Counsel for private respondents No. 5 to 12 present and reply filed. Copy handed over to appellant. Appellant is directed to provide fresh and complete address of other private respondents within 15 days and thereafter, notices be issued to them. To come up for written reply on 22.08.2014

Appent No. 407/2014. Mn. 2 aufer. Counsel for the appellant present. Preliminary arguments

heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 09.10.2013, he filed departmental appeal on 05.12.2013, which has not been responded within the statutory period of 90 days, hence the present appeal on 20.03.2014. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. Appellant has also filed an application for interim relief. Notice of application should also be issued to the respondents for reply/arguments. To come up for written reply/comments on main appeal on 12.06.2014 as well as reply/arguments on application on 17.04.2014.

This case be put before the Final Bench  $\frac{1}{\sqrt{2}}$  for further proceedings.

Appellant in person and AAG with Muhammad Amin Tanoli, Inspector for the official respondents and Mr. Muhammad Asif Yousafzai, Advocate for respondents No. 5, 6, 7, 8, 9, 10, 11, and 12 present and requested for further time. None is available on behalf of other private respondents. Fresh notices be issued to them through registered post. To come up for written reply on 12.6.2014.

MEMBER

MEMBER

Membe

airman

4.2014.

Appellant in person present and submitted an application wherein he requested for early hearing instead of 12.6.2014. Request is accepted. To come up for written reply on 14.5.2014 instead of 12.6.2014. Notices be issued to the respondents.



7.4.2014

## Form- A

## FORM OF ORDER SHEET

Court of

Case No.\_

# 407/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate			
1	2	3			
1	24/03/2014	The appeal of Mr. Zanfer resubmitted today by Mr.			
	· .	Abdul Shakoor Khan Advocate may be entered in the Institution			
. '	· ·	register and put up to the Worthy Chairman for preliminary			
		hearing.			
•	· · ·	all			
, ,		REGISTRAR -			
2	24-3-9014	This case is entrusted to Primary Bench for prelimina			
	. ,	hearing to be put up there on $3 - 3 - 2 p/4$ .			
		CHAIRMAN			
	-				
	· ·				
	· .				
2					

The joint appeal of M/S. Muhammad Amjid, Abdur Rasheed, Zanfer and Muhammad Atlas received today i.e. on 20.03.2014 is incomplete on the following scores which is returned to the counsel for the appellants for completion and resubmission within 15 day.

- 1- Appeal may be got signed by the appellants and counsel.
- 2- Annexures of the appeal may be attested.
- 3- Addresses of respondent No. 5 to 45 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal Rules 1974.
- Law under which appeal is filed is not mentioned.
- 5- Heading of the appeal is incomplete which may be completed.
- 6- Page No. 54 of the appeal is illegible which may be replaced by legible/better one. 7- Sub rule 2 of rule-3 of appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately; therefore the appeal of the above named appellants may be filed separately/individually.
- 8- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal may also be submitted with the appea.

473 /S.T. 3\_/2014.

SERVICE TRIBHN KHYBER PAKHTUNKHWA PESHAWAR.

and Sheless letters

ASC 2401 24.3.2049

Mr. Abdul Shakoor Khan Adv. A.Abad

After removing the alization. daired, the appeal is Re-monthed to the place ment befor the Honoble Torband For pailmany hearys ad C.M. A for stay. 24 is also avonithed an application & the gant of examption for foling the Colores of appeals for sedpenealed till the adminies of sexues reary of said apped is also fil

### BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Appeal No. 407 /2014.

\$
Zanfer Head constable, KPK Police Department posted in District Torghar.

Appellant

#### Versus

Provincial Police Officer, KPK, Peshawar others.

Appeal INDEX

Respondent

and

			······································
S.No.	Particulars	Annexures	Pages
1	Appeal alongwith		1-28
	affidavit.		1-0-1
2	Photocopy of the	A	20
	transfer order.		30
3	Copy of list of C-I.	В	31-32
4	Copy of relevant rule.	С	33-39
5	Copy of petition.	D	40-47
6	Copy of order of	Е	,
	Honourable Peshawar		48-48
	High Court.		
7	Photocopy of the	F ·	
	decision of said		50-54
	committee.		<b>_</b> _ /
8	Copies of letter dated	G & H	
	04.07.2012 of DIG		55-56
	Office, Hazara Region		22.00
	and letter of		
-	Provincial Police		
	Officer KPK Peshawar		
	letter dated		
	30/07/2012.		
9	Copies of minutes of	I&J	
	Police Darbar Torghar		2
	dated 05/10/2012 and		7.0
	letter of DIG Hazara		
	Region dated		
	07/11/2012.		
10	Copy of letter dated	К	1
,	09/10/2013.		60
11	Copy of appeal and so-	L&M	60
	called seniority list		6,
	of Head Constables of		1-Ce
-	District Torghar.		7
		I	Ļ

12	Copy of standing order	N -	-
	dated 08/04/2009.		
13	C.M. Application with		
	Affidavit.		
14	C.M. Application for		
	exemption.		
15	Vakalatnama		

Appellant

Through:-

Ð.,

(Abdul Shakoor Khan) Advocate Supreme Court of Pakistan.

Dated: /03/2014.

### BEFORE THE K.P.K SERVICE TRIBUNAL

#### PESHAWAR.

Appeal No. \_ 407 /2014.

Zanfer Head constable, KPK Police Department posted in District Torghar.

Appellant

#### Versus

Provincial Police Officer, KPK, Peshawar. 1.

2. Additional Inspector General of Police, Establishment KPK, Peshawar.

3. Regional Police Officer, Hazara Region, Abbottabad.

District Police Officer, Torghar. 4.

5. Qaim Ali Shah Head Constable District Police Torghar through District Police Officer Torghar.

6. Sohail Head Constable District Police Torghar through District Police Officer Torghar.

7. Waheed Murad Head Constable District Police

Torghar through District Police Officer Torghar.

Cadet Sarfraz son of Ali 8. Zaman, Head Constable District Police Torghar through District Police Officer Torghar.

de-selection to-day und filed.

116 13

- 9. Shahzad Head Constable of District Police Torghar through District Police Officer Torghar.
- 10. Niaz Ahmed Head Constable of District Police Torghar through District Police Officer Torghar.
- 11. Muhammad Arshad Head Constable of District Police Torghar through District Police Officer Torghar.
  - 12. Ejaz Ali Head Constable of District Police Torghar through District Police Officer Torghar.
  - 13. Naseer Akther Head Constable of District Police Torghar through District Police Officer Torghar.
  - 14. Waris Khan Head Constable of District Police Torghar through District Police Officer Torghar.
  - 15. Sanaullah Head Constable of District Police Torghar through District Police Officer Torghar.
  - 16. Ghulam Jan Head Constable of District Police Torghar through District Police Officer Torghar.
  - 17. Abdul Qadeer Head Constable of District Police Torghar through District Police Officer Torghar.

P- 2

- 18. Malik Imtiaz Head Constable of District Police Torghar through District Police Officer Torghar.
- 19. Alam Zaib Head Constable of District Police Torghar through District Police Officer Torghar.
- 20. Muhammad Ayub Head Constable of District Police Torghar through District Police Officer Torghar.
- 21. Abdul Mateen Head Constable of District Police Torghar through District Police Officer Torghar.
- 22. Muhammad Saleem Head Constable of District Police Torghar through District Police Officer Torghar.
- 23. Khalil ur Rehman Head Constable of District Police Torghar through District Police Officer Torghar.
- 24. Muhammad Asif Head Constable of District Police Torghar through District Police Officer Torghar.
- 25. Muhammad Sajid Head Constable of District Police Torghar through District Police Officer Torghar.
- 26. Muhammad Sajid Head Constable of District Police Torghar through District Police Officer Torghar.

- 28. Bin Yameen Head Constable of District Police Torghar through District Police Officer Torghar.
- 29. Zaheer Head Constable of District Police Torghar through District Police Officer Torghar.
- 30. Qaisar Zohaib Head Constable of District Police Torghar through District Police Officer Torghar.
- 31. Muhammad Rafi Head Constable of District Police Torghar through District Police Officer Torghar.
- 32. Mir Afghun Head Constable of District Police Torghar through District Police Officer Torghar.
- 33. Wazir Muhammad Head Constable of District Police Torghar through District Police Officer Torghar.
- 34. Ahmed Saeed Head Constable of District Police Torghar through District Police Officer Torghar.
- 35. Muhammad Rizwan Head Constable of District Police Torghar through District Police Officer Torghar.

36. Abid khan Head Constable of District Police Torghar through District Police Officer Torghar.

٤

- 37. Ghulam Mohi-ud-Din Head Constable of District Police Torghar through District Police Officer Torghar.
- 38. Muhammad Mustaqim Head Constable of District Police Torghar through District Police Officer Torghar
- 39. Muhammad Iqbal Head Constable of District Police Torghar through District Police Officer Torghar.
- 40. Anwar Head Constable of District Police Torghar through District Police Officer Torghar.
- 41. Taleh Muhammad Head Constable of District Police Torghar through District Police Officer Torghar.
- 42. Gul Afzal Head Constable of District Police Torghar through District Police Officer Torghar.
- 43. Sohail Nadeem Head Constable of District Police Torghar through District Police Officer Torghar.
- 44. Fida Muhammad Khan Head Constable of District Police Torghar through District<sup>3</sup> Police Officer Torghar.

45. Ghulam Shabir Head Constable of District Police Torghar through District Police Officer Torghar.

Respondents

APPEAL UNDER SECTION 4 K.P.K SERVICE TRIBUNAL ACT 1974.

It is respectfully submitted as under:-

1.

2.

řŤ

That appellant above named originally joined the police service as foot constable in the year 1996 being resident of District Abbottabad was posted in District Abbottabad.

That in the year 2011 in Hazara Range new District namely Torghar was established. After the establishment of District Torghar the ASIs and Sub Inspectors and Inspectors of Police Force of Hazara Region working in various District of said region were transferred to Torghar as per the orders of his superior officers. While the foot constable and Head Constables who

were working in various District in Hazara Region on their request were posted in new District Torghar. The private respondents before their posting in Distt Torghar on their request or loan basis were working in various District of Hazara Region Constables and Head Constables. as Ιt is also not out of place to mention here that all of them joined the Police Department in Hazara Region and did lower course after the appellant. In this way they were not only junior to appellant in Police Deptt but were junior in lower course. Photocopy of the transfer order of appellant is annexed as Annexure A.

That it is not out of place to mention here that appellant was promoted as Head Constables in 2013 after being posted in District Torghar. It is also not out of place to mention here that no foot constable can be promoted to the position of Head Constable under the

3.

Police Rules 1934 chapter No.13 Para No.13.8, unless he undergoes lower course training at Hangu Police Training College. It is further added here that appellant has passed lower course training on 20.09.2006.

£

4.

That appellant after his posting in District Torghar was declared senior to those Head Constable of District Torghar who were promoted earlier to him on the basis of aforementioned rule. Under the said rule the Head Constable who has passed lower course training first shall rank senior to other Head Constable who did the same course after him. The same seniority gives the first right to that Head Constable for doing intermediate course who has passed lower course training first and also secured better position then others per the merit order of Hangu as Training College. Copy of list of Cstood on 30.09.2013 Т as and prepared by the District Police Officer Torghar as per the mandate

That it is not out of context to mention here that in District Torghar since 2011 till first October 2013 all those Head Constables have been sent for intermediate training course at Police Training College Hangu who had passed the lower course earlier then other Head Constables and were enlisted senior in list C as per therequirement of Police Rules and standing order of Police Force. Copy of relevant rule is annexed as annexure C.

in the year 2012 the That Head Constable namely Ayaz Khan Head Constable who due to wrong application of law which was not applicable in the case of Police employees was enlisted junior to respondents No. 5 to 7 and others Head Constables of District Torghar. But subsequently on the intervention

5.

6.

of Hazara Region office of Police the correct law applied and on his having passed lower training course earlier then all the others Head Constables of Distt Torghar was declared senior to them and list C was prepared according to Police Rules and standing order. Accordingly said Ayaz Khan was selected for intermediate course. The respondents No 5 to 7 on the selection of said Ayaz Khan filed a constitutional Petition No.306-A of 2012 before the Honourable Peshawar High Court. Copy of petition is annexed as Annexure D.

That the Honourable Peshawar High Court vide its order dated 25/04/2012 without passing any effective order treated the aforesaid petition of respondents No.5 to 7 as their representation and ordered the same be sent to District Police Torghar and Regional Police Officer Hazara with direction that they may consider the grievance

7

of said respondents in accordance with law within the period of 30 days, if not earlier from the receipt of said order. The said Police Officers of Police were also directed that in case the grievances of respondents No.5 to 7 are not redressed then they tender reasons for same in writing and communicate to the respondents and Additional Registrar of Peshawar High Court Abbottabad Bench. Copy of order of Peshawar High Court is annexed as Annexure E.

That it is also not out of context to mention here that aforesaid Ayaz Khan Head Constable No.254 in the meanwhile had completed the intermediate course from Police Training College Hangua, according to the Police Rules. It is further added here that the said Ayaz Khan Head constable after doing the intermediate course is now enlisted in List-D. Which is maintained by the District Police Officer Torghar

8.

and has become eligible for his promotion as ASI.

9

That subsequent to the order of this Honourable Court dated 25/04/2012 the Police Department constituted a committee vide order dated 26/06/2012 for consideration of the representation of respondents No.5 to 7. It is worthy to mention here Deputy Inspector General of Hazara Region, Abbottabad, as its Chairman, headed the said committee. Whereas, District Police Officer Abbottabad, Senior Superintendent Investigation, Abbottabad, Senior Superintendent Coordination/FRP Abbottabad and deputy superintendent Legal/ Investigation Abbottabad were its members. The said committee after detailed deliberation has come to the conclusion that the grievances of respondents No.5 to 7 were having no force since the name of Mr. Ayaz Khan and two other Head Constables from District Torghar were sent to Police Training College, Hangu for

intermediate course according to the list C-I maintained by District Police Officer Torghar as per Police Rules 1934. Photocopy of the decision of said committee is annexed as Annexure F.

10.

That, private respondents did not challenge the decision of aforesaid committee before any forum. It is worthy to mention here that in the meanwhile the Deputy Inspector General of Hazara who was also chairman of said committee has vide its letter dated 04/07/2012 sought the guidance from the office of Provincial Police Officer KPK, Peshawar, with regard to the maintenance of seniority list of Head Constable of District Torghar who have been transferred from other District of Hazara Region on their request or lone basis. The Provincial Police Officer KPK Peshawar vide its letter dated 30.07.2012 advised the Deputy and the second the second the

intermediate course according to the list C-I maintained by District Police Officer Torghar as per Police Rules 1934. Photocopy of the decision of said committee is annexed as Annexure F.

and the second secon

and the second second

10.

That, private respondents did not challenge the decision of aforesaid committee before any forum. It is worthy to mention here that in the meanwhile the Deputy Inspector General of Hazara who was also chairman of said committee has vide its letter dated 04/07/2012 sought the guidance from the office of Provincial Police Officer KPK, Peshawar, with regard to the maintenance of seniority list of Head Constable of District Torghar who have been transferred from other District of Hazara Region on their request or lone basis. The Provincial Police Officer KPK Peshawar vide its letter dated 30.07.2012 advised the Deputy Inspector General Hazara region that

rules are clear, the seniority of Head Constables of every District will be counted from the date and merit order of lower school course not otherwise. Copies of letter dated 04.07.2012 of DIG Office, Hazara Region and letter of Provincial Police Officer KPK dsPeshawar letter dated 30/07/2012 are annexed as Annexure G & H.

That as hinted here in above the respondents No.5 to 9 did not challenge the decision of aforesaid committee and relevant Police Rules before proper forum on the basis of which it is declared and followed in all over Pakistan by Provincial Police Force that list C-I will be maintained according to the order from the date of passing lower training course and merit order of said course of Head Constable. However, they in the month of October 2012 raised their said. grievance before the Police Darbar at Police Line District Torghar,

11.

which was already answered by the aforesaid committee. The District Police Officer Torghar assured them that he would discus their grievance with the Deputy Police Inspector General Hazara Range and would try his best to accommodate them as per their request. The copy of the minutes of said Darbar was sent to Deputy Police Inspector General Hazara Region. He on the receipt of said minute vide his letter dated 07/11/2012 advised the District Police Officer Torghar that criteria has already been settled vide Police Rules 1934 and the same be followed. He has also drawn his attention to Provincial Police Officer letter dated 30/07/2012, which is referred to hereinabove in para No.10. Copies of minutes of Police Darbar Torghar dated 05/10/2012 and letter of DIG Hazara Region dated 07/11/2012 are annexed as Annexure I & J.

That the private respondents despite of the legal opinion of AIG

12.

Establishment, which was conveyed to DIG Hazara Region, from the office of Provincial Police Officer KPK Peshawar maneuvered а letter in their favour from the Office of Additional I.G.P KPK Peshawar dated 09/10/2013. The same was absolutely against the Police Rules 1934 and standing order of Police Force. Copy letter dated 09/10/2013 of is annexed as Annexure K.

13.

That the appellant alongwith three other head constables of District Torghar who were effected and resultantly despite of having ripe up of their case for intermediate course would become unable to do the same on their due turn according to the police rules made а representation within 30 days after being aware of the said letter before the respondent No.1. Subsequently the District Police Officer Torghar has made unlawful seniority list of Head Constables of District Torghar which was not only

discriminatory but was in disregard of Police Rules 1934. Copy of appeal/representation and so-called seniority list of Head Constables of District Torghar are annexed as Annexure L & M.

14.

That, more then three months have been elapsed since the filing of appeal before the I.G KPK Peshawar, but he has taken no action upon it as yet. Under the circumstances, the appellant is left with no other option but to file this appeal before this Honourable Tribunal, inter-alia, on the following grounds and that other better grounds which shall be urged at the time of hearing.

#### GROUNDS

 a. That since 1934 onwards and till this date the Police Force in United India and after its
 partition i.e after the creation of Pakistan and India is following

the Police Rules 1934 with regard to the terms and conditions of Police Force Personnel i.e right from foot constable to Deputy Superintendent of Police. Under the said Rules there is no concept of seniority list bottom wise as maintained in the case of other civil servants in the light of Civil Servant Act 1973. Thus, the preparation of impugned seniority list bottom wise of Head Constables of District Torghar by District Police Officer the Torghar like other civil servants is violative of Police Rules 1934.

b. That under the Police Rules 1934 only those Police Constables who after passing A & B courses when do lower course training becomes entitle to do intermediate course subject to his promotion as Head Constable. The first right to be placed in list C-I will be of that Head Constables who has passed lower course training first irrespective of the prior promotion of other Head Constable who has passed lower training course after him.

c. That the private respondents have not called in question the decision of committee which was constituted in the light of the order of Peshawar High Court dated 25/04/2012 and it has declared that under the Police Rules 1934 and standing order meant for Khyber Pakhtunkhwa police force only those Head Constables have got the first right to do intermediate course first who are enlisted senior in list C-I because of his passing lower training course first and having better merit. In view of this position, it is clearer then crystal that private respondents maneuvered letter а dated 09/10/2013 purportedly issued by Additional Inspector General of Police Head Quarter KPK Peshawar

and on the basis of which the District Police Officer Torghar has prepared seniority list of Head Constables of Torghar against the Police Rules 1934 and Khyber Pakhtunkhwa police force standing orders. As the said rules only talk about list C-I of Head Constables and under it the Head Constable who have passed lower training course first and having better merit position shall rank senior to others for the purpose of doing intermediate course from concerned Police Training College. Thus, the impugned seniority list of Head Constables prepared by D.P.O, Torghar is illegal and respondents No.5 to 9 and all other private respondents in view of that list are having no prior right then the appellant for doing intermediate course from Police Training College Hangu, as the appellant have passed lower training course much earlier to the said respondents.

d. That the list C-I of Head Constables which was prepared as per the mandate of chapter 13 rule 13.8 of Police Rules 1934 give the first right to that Head Constables who passes lower course prior in time and better in merit.

e. That throughout the KPK Province in every District the list C of Head Constables is prepared in the order in which order Head Constable passes the lower course irrespective of his promotion i-e in case he is promoted after doing lower course shall rank senior to that head constable who although promoted earlier to him but did lower course after him. Thus, the District Police Officer Torghar in way can make the District no exception to the Police Rules 1934 and as such his that act is not only violative of Police Rules 1934, but is а sheer discrimination against the

appellant and three others Head constables and as such is a naked violation of Article 25 of the Constitution of Pakistan.

P- 22

LEUT COTTOI DININE PRINTED ATTACK

uotber that That District Police Officer Torghar was having no lawful authority to prepare a seniority list of Head Constable Torghar in violation of Police Rules 1934 and Standing order of Provincial Police Officer dated 08/04/2009. Copy of standing order dated 08/04/2009 is annexed as annexure N.

> g. That appellant and private respondents have been transferred to District Torghar from other Districts of Hazara Region on their own request and there was no distinction amongst them. Nor any competent authority, before the posting of appellant, and private respondents in District Torghar, have made any distinction between the appellant, three other head

constables and private respondents under the standing order. Thus, the impugned seniority is illegal being violative of Police Rules 1934 and discriminatory being violative of article 25 of the Constitution of Pakistan. As such, in view of this position the District Police Officer Torghar was having no lawful authority and jurisdiction to make a distinction between the appellant and respondents for the purpose of doing intermediate course and giving priority to the respondents No.5 to 9 and others Head Constables over the appellant.

P-23

. S. . . .

h. That the impugned illegal seniority list of Head Constables which is made in violation of Police Rules 1934 and standing order of Provincial Police Officer KPK is self explanatory that appellant have passed the lower course much earlier to the private

constables who were shown as junior in that list were sent for intermediate course on 01.10.2013. As such appellant and three other head constables are having the legal right in terms of Police Rules 1934 to be sent in the end March 2014 for intermediate of course at concerned Police Training College.

i.That so far the rule 13.8 of chapter 13 of Police Rules 1934 and standing order dated 08/04/2009 has not been declared by any court of law as unconstitutional or illegal. Thus, in view of this position, the District Police Officer Torghar was having no lawful authority and jurisdiction to act otherwise then that rule and standing order. Thus he is having no lawful authority to deprive the appellant and three other head constables from their due right of doing intermediate course training at Police Training

College, which fall due in end of March 2014.

- j. That no rule and law and practice, which attain the status of law can be done away with by the executive order or decision. Thus, in view this position the impugned of illegal seniority list of Head Constables, which was prepared by District Police Officer the Torghar on the basis of an illegal executive order through that appellant have been denied from right to do intermediate his training course from concerned Training College which fall due in the end of March 2014.
- k. That, private respondents are younger then the appellant as they have joined the Police Department as foot constables much after the appellant and they according to their age and seniority as per lower training course will be able to do intermediate course much

earlier to the cut off year for said training.

1. That under the Police Rules 1934 Chapter 13 and Rule 13.3 for the purpose of the promotion from foot constable to Inspector there shall be six list namely A, B, C, D, E & F. List A, B, C & D shall be kept District wise and according to it constables shall be promoted to Head Constables and Head Constables as Assistant Sub-Inspector. There is no concept of seniority list of Head Constables under the Police Rules 1934 as prepared by District Police Officer Torghar simply to accommodate the unjust, illegal, request of the respondent 5 to 9. Thus, the same is liable to be quashed.

m. That since 2011 i.e after the establishment of District Torghar till October 2013, the Head Constables who were enlisted in

P- 26

list C-I according to Police Rules 1934 have been sent for intermediate training course at Police Training College Hangu. So, in this view of the matter appellant have got every right to be sent to Hangu Police Training College for doing intermediate course, which enables the Head Constables for his promotion to ASI in the end of March 2014.

n. That, the DPO Torghar has scraped the right of appellant of doing intermediate course from Hangu Training college which is scheduled to be commenced in the first week of April 2014 without issuing any show cause notice and calling his objection in regard to the impugned seniority list which has got no room under the police rule 1934 and Khyber Pakhtunkhwa police standing orders.

o. That the appeal is within time.

4.16.172.54

**P-**27

It is, therefore, very humbly prayed that this Tribunal may graciously be pleased to declare that the list C-I of Head Constables of District Torghar as stood before or on 30.09.2013 is according to Police Rules 1934 and appellant have got the prior right to do intermediate course then the private respondents, which fall in the end of March 2014 and impugned seniority list which is prepared by the District Police Officer Torghar after 30/09/2013 is violative of Police Rules 1934 and it does not vest with any right to respondents No.5 to 9 and other private respondents for doing intermediate course prior to the appelfant.

Appellant

Through:-

. An

(Abdul Shakoor Khan) Advocate Supreme Court of Pakistan.

Dated:- \_\_\_/03/2014.

31/~~

#### BEFORE THE KPK SERVICE TRIBUNAL

#### PESHAWAR

Appeal No. \_\_\_\_ /2014.

Zanfer Head constable, KPK Police Department posted in District Torghar.

Appellant

#### <u>Versus</u>

Provincial Police Officer, KPK, Peshawar and others. Respondents

#### AFFIDAVIT

I Zanfer Head constable, KPK Police Department posted in District Torghar do hereby declare on oath that the contents of the appeal are true and correct and nothing has been concealed from this Honourable Tribunal.

Deponent



P-**90** 

Phone No. 0992-9310021 Fax No. 0992-9310023

<u>B/O</u>

# ORDER ANNEXURE-A-

LHC Zanfar Khan No.19 of Operational Wing Abbottabad is

hereby transferred and posted to Torghar District with immediate effect.

### Regional Police Officer, Hazara Region (Abbottabad). (C.O Wajid Mehmood)

No. 17/0 - 11 /E, Dated Abbottabad the Ol

359

vated Abbottabad the O(02/2013).

Copy of above is forwarded for information and necessary

action to the:-

1. 2 District Police Officer, Abbottabad. District Police Officer, Torghar.



Phone No. 0992-9310021 Fax No. 0992-9310023 From: The Deputy Inspector General of Police, Hazara (Abbottabad) i n@ To; The District Police Officer, Torghar, No. /E, Dated Abbottabad the, · . . . . /2012. Subject:-SENIORITY LIST OF PROMOTION LIST LHC C. OFFICIATING HCs. ANNEXURE Memorandum: Please refer to your office memo: No.963/OHC dated 14-04-2012.

As almost all the LHCs on list C-I have been transferred to Torghar District on permanent basis at their own request from down Districts, therefore their seniority may be maintained in accordance with the order of merits of Lower Class Course (C-I) in the light of instructions issued by the Provincial Police Officer Khyber Pakhtunkhwa vide No.9430/E-I dated 08-04-2009 (copy enclosed).

74

Deputy Inspector General of Police Hazara (Abbottabad) (AEC Dilawar)



POLICE DEPARTMENT

### DISTRICT TORGHAR

æ

	S	ENTORITY	LIST OF HE	AD COI	VSTABLE (	ראים או		CHYD.	-0	
	· <u>P</u>		·	10 001		<u>, 1010 1</u>		GILAR .	· · · · ·	24
S. No	Name &No.	D/O Birth	Date of Enlistment	Edu:	Term Ending	Order of Merit	Date of Brought on C-I	Date of Promotion as HC	Facing any Dep: Enquiry	REMARK
1	HC Mir Afghan No.52	20.02.1976	20.10.1999	· 10 <sup>m</sup>	20.09.2006		20.09.2006	06.06.2013		
2	HC Wazir Mubammad No.355	10.04.180	20.10.1999	FA	20.09.2006	100	20.09.2006	06:06.2013		·
3	HC Ghulam Shabir No. 415	02.07.1975	15.10.1996	10th	20.09.2006	151	20.09.2006	20.05.2013		· · · ·
4	HC Amjid Khan No.93	24.02.1975	27.06.1996	- 10 <sup>th</sup>	20.09.2006	190	20.09.2006	06.06.2013		
5	HC Atlas No. 171	06.10.1972	04.10.1993	10 <sup>th</sup>	20.09.2006	209	20.09.2006	30.12.2010		·
6 .	HC Abdur Rasheed No.338	20.04.1975	20.10.1999	10 <sup>th</sup>	: 20.03.2007	15	20.03.2007	06.06.2013.		<u>·</u>
7	HC Zanfar Khan No.359	03.04.1978	20.10.1999	FA	25.07.2007	84	25.07.2007	06.06.2013	<del> </del>	
8.	HC Waqas No. 341	02.06.1975	20.10.1999	FA	25.07.2007	. 90	25.07.2007	21.05.2012	· - ·.	
9	HC Muhammad Sajid No. 290	02.02.1975	25.09.1996	10 <sup>th</sup> .	30.11.2007	12	.01.12.2007	02.01.2013	<u>+</u>	· · · ·
10	HC Alam Zaib No. 5	02.08.1980	01.05.2001	. FA	20.03.2009	. 143 ·	20.03.2009	22.03.2012	  .	
11.	HC Niaz Ahmad No. 67	03.01.1984	28.01.2002	FSc	20.09.2009	. 95	·01.10.2009	24.01.2012	1	<u>  . · · -</u>
12	HC Sarfraz Ahmad No. 280	10.03.1987	03.05.2007	FA .	20.09.2009	95	01,10.2009	. 19.12.2011		+
13	HC Bin Yameen No. 342	10.12.1978	20.10.1999	FSc	20.09.2009	98	20.09.2009	02.01.2013		
14	HC Qaim Ali Shah No. 281	15.09.1977	28.01.2002	FA	20.09.2009	141	01.10.2009	19.12.2011		
15	HC Muhammad Rafi No.354	02.02:1981	24.01.2002	FA.	20.09.2009	. 161	20.09.2009	06.06.2013		
16	HC Malik Imtiaz No. 269	16.01.1978	20.10.1999	· 10 <sup>th</sup>	20.09,2009	213 .	20.09.2009	. 02.01.2013		
17	HC Muhammad Rizwan No.358	12.08.1972	07.11.1995	BA	17.05.2005	97	18.05.2005	06.06.2013	- •	Transfer from Sindh Police seniority
. }			·	•		· ·		· ·		accepted. at bottom Arrival Date 23.11.2009
<u> </u>	HC Ejaz Ali No. 163	01.01:1978	20.06.2000	BA	20.03.2010	17	01.04.2010	24.01.2012	•	
. 1	HC Shehzad Ahmad No. 282	16.04.1978		7 BA ~:	720.03.2010	8,6	~01:04:2010~			
-	HC Waris Khan No. 168	17.12.1978		12: FA -51	20.03.2010	118	01.04.2010	÷05.03;2012	1.1 - 3.11	
	HC Sanaullah No.182	04.04.1980	01,02.2002	FĀ	20.09.2010	40	20.09.2010	05.03.2012		•
	HC Muhammad Sohail No. 283	01.01.1982	29.10.2003	MA,	20.09.2010	81	01.10.2010	24.01.2012	•	
	HC Ahmad Saeed No. 356	13.04.1980	01.07.2000	FA	20.09.2010	132	14.11:2010	22.03.2012		• • •
!.	HC Ghulam Mohi-ud-Din No.362	- 13.02.1980	20.06.2000	BA	20.03.2011	25	01.04.2011	06.06.2013		· · · · ·
25 ·	HC Muhammad Sajid No. 336	04.01.1980	20.11.2003	FA '	20.03.2011	27	20.03.2011	02.01.2013		•



· .	,		- ·												
	HG-Waheed Murad No. 253	01.05 1979	28.01.2002	FA	20.03.2011	66	01.04.2011-	-24.01.2012	-	0-0-0					
26	HC Naseer Akhtar No. 272	01.11.1978	05.03.2002	FA	20.03.2011	77	20.03.2011	,05.03.2012		V-35					
27	HC Fida Muhmmad Khan No.396	16.03.1986	18.03.2008	MA	20.03.2011	88	04.07.2011	01.09.2013	-						
28	HC Abid Khan No. 317	21.03.1978	03.04.1996	10 <sup>th</sup>	11.10.2008	60/C	17.12.2008	20.09.2009	•	Transfer from Baluchistan Police					
29	NC Alla Allan 110, 517					•		-		seniority accepted					
· · ·				:			•			at bottom arrival Date 02.07.2011					
		01.05.1981	01.07.2002	10 <sup>th</sup>	20.09.2011	6	20.09.2011	03.07.2012							
30	HC Ghulam Jan No. 191	20.04.1980	24.02.2000	10 <sup>th</sup>	20.09.2011	39	20.09.2011	02.01.2013	-						
31	HC Zaheer No. 347	20.04.1980	29.10.2003	BA	20.09.2011	175	15.02.2012	05.03.2012							
32	HC Muhammad Arshid No. 140	03.03.1981	01.05.2001	FA -	20.09.2011	214	31.01.2012	20.04.2012	-						
. 33	HC Abdul Qadeer No. 209 HC Muhammad Ayaz No. 213	14.06.1983	01.01.2003	FSc	20.09.2012	15	18.12.2012	02.01.2013	• • • • • • • • • • • • • • • • • • •	· .					
34	HC Abdul Mateen No. 173	17.06.1988	14.07.2009	BA	20.09.2012	46	18.12.2012	02.01.2013	-						
35	HC Muhammad Saleem No. 187	02.01.1984	18.10.2004	MA	20.09.2012	48	18.12.2012	02.01.2013	•	·					
37	HC Khalil ur Rehman No. 141	16.04.1983	05.03.2003	FA	20.09.2012	119	18.12.2012	02.01.2013	-	· · · · · · · · · · · · · · · · · · ·					
38	HC Qaisar Zaib No. 349	.01.04.1983	01.04.2005	BA	20.09.2012	132 ·	01.10.2012	02.01.2013		<del>_</del>					
39	HC Muhammad Asif No. 285	01.01.1985	15.10.2004	FA	20.09.2012	-133	18.12.2012	02.01.2013		 					
40	HC Muhammad Mustaqim No.289	01.01.1984	01.02.2002	. 10 <sup>th</sup>	20.03.2013	· 31	20.03.2013	06.06.2013							
41	HC Muhammad Iqbal No.249	01.03.1985	05.11.2003	FA	20.03.2013	. 84	20.03.2013	06.06.2013							
• 42	HC Anwar No.252	01.03.1980	05.11.2003	10 <sup>th</sup>	20.03.2013	110	20.03.2013	06.06.2013	-						
43	HC Taleh Muhammad No.123	01.05.1980	15.10.2004	FA	20.03.2013	144	20.03.2013	06.06.2013	· .	<u></u>					
44	HC Gul Afzal No.340	20.12.1979	10.04.2001	10 <sup>th</sup>	20.03.2013	215	20.03.2013	06.06.2013							
45	HC Schail Nadeem No.211	20.04.1986	15.10.2004	BA	20.03.2013	301	20.03.2013	06.06.2013	· · ·						
				<u> </u>	; ,	<u></u>	• .								

43HC Taleh Muha44HC Gul Afzal N45HC Sohail Nad

Missioner \*

District Police Officer, 7 Torghar

W

234 S.A. RASHID KHAN. POLICE RULES, 1934 ANNEXURE. ¢¢: 20 PX مرتبه بحكم صوبان كورمن في زمير وفعات ، «١٢ الكث تنبر المماسية تم كاسول مح طلباء لي م المفاده مح التفاده مح لي ترميم شاره مع يوليس آرڈ ر2002ء (چف ایگزیکو آرڈرنمبر 22 مورند 14 اگست 2002) RS. 250 Ph:(042)7237688 7232816 ommissio



لاخد لويدن أو يم ن مجرو المصالب وا بخ تدبق الحرارى ما ولا الا تقال بسبولو الموالا في المحرف الما يخترف لو بالان مدن و تجالف المسحف ها مى من الدين الاب و سكو سكو الا الملك حرف ما ما الله على التبعالا لا محلف الما يحدث بالمع الحية لولا ترف ف مالا العلم من ما ما يخت لو ما لما الحرك مليك تشير ما الما يحدث بنا بعد الاسلوم المحدث بنا بعد ا - فحية لولا ترف ف مالا على ما ما ما يخت لو ما لما الحرك بليك تشير ما الما يك من ما الما المحدث المعالي ما محدث المعالي المعالي التو ما المحدث المحال المحدث المحدث المحدث المحدث المحدث المحدث المحدث المحدث المحال المحدث المحال المحدث المحال المحدث المحدث المحدث المحد الحق لولا ترف ف مالا على ما ما يوالا تحدث المحال المحدث الم - والح لولا ترف ف مالا على ما ما ما يخت لو محاله الحل معالي المحدث المحد - والح لولا ترف ف مالات على ما معال المحدث المحد - والح لمحدث المحدث المح - الح لمحدث المحدث ال

مذين الالحر مقارباتي الحروث بمنتظن المولام ولارز الدحر، بيند تسيية ورود لا بينا عين بيند المعرف المالية المولا للألبين من الملك في المراجع المالية المالية المركب فولار في في من عن المستعداد من المعرف المناسعة المولات المع لماله لمالية لمالي مالية المالية للمالية المالية من لالإلاق في المنا عن بم تعلي لا المنا المن المعرف المنا المن

مبدلاك في شريدا فرمبخ لاعنان مبدلا برما ومبدلا الما والقرن مبدلا ما القرن المحرف المعنان الم المعنان ما المال المعنان المعنان المعالي المعالي المعنان المعنان المعنان المعنان المعنان المعنان المعنان المعنان - المعني ما المعنان المعنان المعاد المعنان المعنان المعنان المعنان المعنان المعنان المعنان المعنان المعنان الم

(PROMOTIONS)

52 -177 - حدارة في المالة المراجعة من مال من منه والما الماية الموالية من الم مدال مدال ت لالعرين في في في تحسب في مالة (الارالا على في في في الحد في الحد في في تديم في في على مالاً في مراكدان يو ما مالالا الارد الممالة في في فت مع في تسبيق من في الحد في في تسبي ما تحسب لذ في من محصر في في مراكدان التي

X -

عد موزین کی مالت میں برایک امنا ذریخوا ہ کی منظوری یا دوک کی نسبت متعلقہ دفتر کا حاکم اعلی باقاعد مکم جاری کریگا جب او تماتی بیاینہ ( TIME SEAL ) سکسی درج یا درجوں سے سامن قید کا بلیت مگی ہو گی ہو تی اسے صف اس افسر سے منصوص میک سے جیسے ان او قاتی بیاند میں امنا فرمات دو سے کا اختیاد ہو عود کیا جائے گا سب انسیکٹروں کی حالت میں ڈیٹی انسیکٹر جزل کی منظوری کی حزودت ہے -

مزف شده ادر جرتی شده انسران می سے ترقیاں دینے کا مقیار اصلاسه دا ؛ انسران گزف شده کو ترتی دینا اور افسران تجرتی شده کو عبده مبات گزف شده میں ترقیاں دینا گودنرک دمنا مندی سے صوبا تی گودنسف کے اختیاد میں سبے -

رمین، انسیکروں مب ان کروں اور است شط سب ان کروں کی فہرست تقدم طانست ہرسال انسیکر وزل کے حکم ہے جیسی ہے - املاع سے میکنشیلوں کی فہرست نوقیت خلوم - ۱۰ - ۱۰۰۷ میں مرّب کی جائے گی -تائم مقام ترتیان کرنے کا اختیار اسمال سر ۱۰ ، انسیکر سے عدد پر تائم مقام ترقیاں ڈپٹی انسیکر جزل صلفہ جاست کریں گے -اکر ترقیات ما بین اضلاع غیر ہمواد اطوا در سے تقسیم کی گئی ہموں تو انسیکر جزل سب انسیکرون فہرست ترقی کے شا دسلے ایک صلقہ سے دوس معلقہ می کریں گے -

د۲)سب انبیگر داستندی سب انبی شریخهده برقائم مقام ترقیاں میزشندن بولیں کمیں گے۔اگر ترقیاں ضلوں کے درمیان فیر ہواد طریقوں سے تقسیم کا گئی ہوں توصاصب ڈپٹی انبیکم جزئ اسٹنڈسی سب انبیکٹران ا ور ہیڈ کنسٹیدلماں بوکرترق فہرست برہوں سے تبادے ایک منطع سے دوسرے منبلے میں کردیں گے۔

سیب بی و در من مهرس پر من سر من بر دم ) قاعده مذاکر معابق جرتر قیات ما تحمان اطل کے عمید وں میں دی جا میں ان سب کا اعلان بولیس گزرف بی کیا ایک حالت میں وجو بہات تحریر کر سے ایسے اسکام کی ترمیم کر دیں ۔ اکر کمی منص سے سر فروش کی نہرست ' د' ما' و' ، ۵' میں ان مرد دعید دن میں ایسی اسلوں کے نیکر لے کے لیے کا فی نام موجود نہ ہوں جن کو انہیں فرکز نا ہے تودہ دُر چی ان جزل سے در فواست کریں گے کہ کمی اور ضلع سے ادمی کا نام کہ یا جائے ۔

l N

میں ساور و سے دیوا سے دیوا ہے میں دور سے اس کا دی کہ ایک سید کر کر کر کہ میں بین با یا جائے گا جب اتک کرائ کنشیدل بیش کر یڈ کے عہدہ برتر تی | سا ہ + ۱۵ کو کک تشیس سینٹ کر ڈ کو کنٹیم کی بین بیا یا جائے گا جب اتک کرائ میں یہ ادومات نہ ہوں ۔ یعنی دائدت ) جبانی صحت سے لحاظ سے منی قاعدہ ۲۱ - ۲۱ (۱) میں بیان کر د ہ معیا در کھا ہو بود میر منڈون کو اختیا دیے کہ شرط د الصف کی پاجدی تھ ہند کر دو کو کا و جو بات کی بنا د میں مات کر دیں ادول کا ل

(۲) بن المحاص مين أوير سيضمنى قاعده نمبر(۱) مين بيان كرده لازمى اوصاف موجود بهون ان كواساميان خالى بوي پرندرجد ذيل طريقة برد سينم بتوسف نمبر(د) كى ترتيب جن ترق دى جلست كى :- دائعت ) تعليم ايندا سے يا بالتر- ٥ نمبر ميٹر كويش ٢ نمبر ميٹر كويش سے نيتي تكريز عمرى سے أو پر ۲ لمبر دوب ) نعدان استى نائت باس كرده د٥٠ نو تير سحول ه لمبر (۲) يوليس ثرينيك كول كى درل م لمبر- (۳) شرينيك دتستى بخش معياد سے مطابق ) ۲ نمبر- (۷) نشان ان أنگش تانمبر - (۵) دمكر دلون سے استمان جن اول يا دولم - انمبر- (۳) اتبعا أن طبق اط د. انمبرد >) مسترى المحد كام كى سكملا أن تا نمبر رج > بيشد د دارة قابلت - ۲ المبر(دانت الى عدم - دور ) بيال جلن - ۱۰ مردانته الى مدى المر - ۲)

۱۳۱) اگر کم کمنیس کی طاذمت دی سال سے کم ہوتواس کومنی قاعدہ ۲۳ سکومز و رج ۲۰ اور (و) کے تود سے نمبنی دیشے جاً میں گے ، بزو(ج) کے نمبروں کا اندازہ توینی مرتیک کور ادر مرابع دیسا تی جسی بدیے ۔ خبروں کی ذاہمی دیئے وی خاص قابلیت کی کا دگرادی سے لگایا جائے گا مشال اکسٹین (ایف بوابیت اسے باس سے دیگرد ڈی اسخان میں اول دباب ۔ اسکام ٹرفیک دنیا نایت آگھٹی کے اسخان پاس کر کچلا ہے ۔ یمن مال کا طال سب اور مشا نسم سر کرد ڈی اسخان میں اول دباب بوسکتاً سے اس سے نمبروا ہوں اور ایک اور کو لاہ ہے جو پی مرال کا طال سب اور مشال کا طاز میں سے دیگر د گا اسخان میں اول دباب ۔ بوسکتاً سے اس سے نمبروا ہوں اور ایک اور کی خاص بی تراندہ سے جو میں سال کا طاز م سے دیگر د گا ہے کا میں سیر کے ت کرم کا ہے ۔ احمال نا مدمات اور نگرانی کرنے میں اس کی قابلیت سر طور پر قابل احماد سے ۔ ہوسکتا ہے کہ دہ حوال برا

دم، منی قاعده دم، چی بیان کرده طریق نبرد بی سے باوجود جواسی می دشوارا در دمترداری سے کاموں پرتعیّناست. میں مندا تحیثیت تعلّم با استاد مستقل طارَمان عملر ٹریفک بقتان جامت م حدرمقا باست سے بحرّر طارَمان مستعیّد نوکری پل برایخ دکرانم با بخ ان کومیش گریڈ میں حارمی ترق دی جاسکتی سپتہ جواسی می معف ان وجو بات پرتر تی یاب بتوستُ بلوں اگران کا کام حن کی خاطران کوتر تی دی گئی بوتستی مجنس نہ بوتوان کوکسی وتست بھی اندیزمیں ان کام سے کام کام ک ماہ سے لیادہ عرصہ کے لیے میں دیا جا سے اوا تی بچار پر والی کی با مستر میں دہ میں ان وجو بات پرتر تی یا سے تین

ده بکشیس بیمیلی لما لاسے دسوی جاحب تک پا اس سے اطل تعلیم دکھتے ہوں ا درخاص کرما ندا فی تعقق بی دکھتے ہوں اپنے دکید شکورس یا تعربیت پاس کرنے بر فورا ہی بلال کا اس تدریجی طریقہ کا دسے س کا دکر تمق قاعدہ د ۲ ) ہیں کیا گباہے میش گریڈ میں ترقی پاسکتے ہیں - ہس کریڈ میں براہ داست ترقیاں قاعدہ ۲۱ - ۱ (السن ) کے مطابق ہوتی ہیں -د۲) قاعدہ ہلا میں مقرد کردہ طریق نمبرد ہی کہ بیروی سے بیلے ہوا کی کمنٹیس کے اعمالنا مسکے ما تھا ایک نام ۲۰۰۰ ہ

د ٤) بسیشل گریڈ بک تر تی تین سال یک زیرا زمائش دیے گی ادر جن کنشیسلوں کو بی تر تی دی گئی ہوا گردہ طربر عل و تا بلیت کا من ل مدیار قائم دیکنے میں قامر دہیں توان کو تادیم تر تی سیسے میں سال سے اندر با قاحدہ محکما نہ کارر دائن سے بغیراد قاتی بیانہ میں دائیں کی جا سکتا ہے ۔ اس قسم کی دابسیاں سے درمینے کی جائیں گی ۔

ده، جب تکونی شخص ایک دفته میت کرید می مستقل کیاگی موتوآس کواس در جرمست خادج کر نے کے لیے اقاعد کادروانی کرنی پڑتی ہے بسیش تکرید میک شیس کی حالست میں میں کو ولالت سے سزا سے جزئا ندمحض یا تیدیا دونوں یا تیر بامندت جرکہ ایک ماہ سے زائد ہوسانی ہو اُس کو بطابق قائدہ بولیس ۲۰۱۰ و ۲۱، موتوت بنی کیا جا کا لیک کی سکھ لیے کا الکم مزااد قاتی بیار پر تنزلی سہت اس طرح بیش کر تکرمنٹ کی کہ حالت میں سیسے نواہ بالعموم یا خاص صفات کا بار دیر ترق ناک می مواکر اس سے برخلات نااط تیت کی شکارے اُس جا ب بوجا سے تواہ بالعموم یا خاص صفات

	· . ·	/ Vu /			5	200	۲ ۲	5	· .			· ·	-	. ·		•	۔ د	ŝ.					·						· *		- - -	
ر ۲۰۱۶ میده قالم مقام اکسد شند مسب انسپکری میں ترقیال یحتی قاعده د ۲۱ میں متو کرده فهرست سے تی ۱۱۱ کمکان	دسه میک بون.	وکولیس ا در دیکشیش سے فرانس کی تمام پراینون مے بنیارت ایسی طرح دباقت مروں ادرا بنی دیا خت در کالا میت ا	باستن طود روترق باب ہوئے کے قابل ہیں۔ اس فہرمت میں حرف ایسے چلاند شیدیا ان کے نام درج کے مانیں سے المراب کے	مج اون اورو پی ان پر خود ان ان کی نسبت منادری درمه مینکم بون کرده خبرد ارست شد مسران پر می من دارتمام بر ا	مینین مرتب دسی بیائے میں جویونیں گزینگ سخل میں اوٹر کورس اور انٹرمیڈیٹ کالی کورٹ کا امتحان پاکسر کر کافہرست مرتب دشی بیائے میں جویونیں گزینگ سخل میں اوٹر کورس اور انٹرمیڈیٹ کالی کورٹ کا امتحان پاکسر کر	نور . فبرک و-اکسیلیزی مدین از کال کرد. و رقرق العلاء ۵ دان برای خیلو مورکار و ایترمی قارم مین و ۱۶ مران بکارشیان	ومروفان مراسب المستار المراجع ا	فهرسته بالمسف العند . بعد و جرم رواض بور غریک که وض بود را دروفردر می درما فت دمحقیقاً مند سے انتخاب کی کرکھ	التاکی نسبت الملہ جا دیج کیا تیجن میں کر کرار کرتے ہو جام حالہ اور ارازت کا وجہ سے ماخا من کورن کے باعث م	د بر		وموافقة ومعصاد برمر المدسمة باربرموقة جارم مراحة أمرم حسب فيشا ومرضوفة فسرم مركزا مركانا مرددمايه دوراته موافقة ومعصاد برمر المدسمة باربرموقة جارم واحترامه مرحسب فيشا ومرضوفة فالمرم بكشيط ركانا مرددمايه دوراته المرس	💈 تابع نغرا ذیرار ماسک سیرم ود دور ) اگرمزا طامت باکود طرید می تابوتوجه مینه کاسلس نیک علیی کید بالکر	المرميزنيذ فمرغد فيولسين خاص وجوبإيت كى بنام ان كوبخرير مين لاتيس تواسمن الاليتيت كوديج المسيخر تزليا كما تعديق كمح	۲ از کانام فیرستایا مدیر اعند، ب یا ج میں درج بنیں کیا میاریم کا اور نر بنی میتور فیرست میں مکھار بر میں کا - تیک دانشا)	المجرسة بإرغاد المعادية وجاج مين داخلا بالزاريك ليرتا ابتست المعوا- ٨ العده د١) جب يخص كوكوني برك بمراطى مجاست تو	کمکی بے کدان کی تعیاد خالی اسا میوں کی تعداد کے دس فیصدی سے زیادہ مرہو۔	ا بورند کرادنی مجیر جامی ابنیں میدیھول اجازت ڈیٹی انسپک <sup>و</sup> پزارل بولیس میڈینڈ بل سرح میدہ پراس طرح ترق دی جا	کمدنید بلان پرش کر طبر جنہوں سفہ استحان لوٹر کول لوٹوس ٹر نیمک شکول سے باس مرکبا ہو کمیں اور طرح سے ترقی یاب	ا مدادیة قابلتیت کالحا ظارکها جارج کارتهان دیگرا وصاون مسا وک پوں و پاں تقدّم طاذمت کے لحاظ سے فیعلرک جانگا۔	ین دا فعارکتا درمخ بویدان ابتیت تبریکی کمتن مکین اوجا دن واستنداد مکامتا بوکررت وقت امتحانات میں کامیا بی سکتر	د ۲۰۱۶ مید فسیر مربع مدد میدترین کمتی قواعد ۲۰۱۰ ، دو ۲ ) میں میان کرد وامول سے مطابق دی تبالیں کی فہرست ج	مبابنه کی اور دینی انسیام چزیل سالان ملاسط پر تتوب شور ست اس کی شیرتالی کر یک منظور کمویں گلے و	کخرف مثر ہ کے بخانک انحست اس ادی کے کام کیا موتو وٹر بھی درن کیوجائیں گے ۔ یہ تہرست اکس کی کے باس ختر دکھی	محتی ۲۰ - ۵ د ۲۷ اس کے فبردرج ہوں کے ادراس کی استعداد علمی اورمیال حکن کی بابت نور پریزند خایان افسید ان	کے لائق تھے جاتے ہودی ، براکم ککشیل کا تشریک کا نام فہرست ترقی میں اچھی ہو کا دلوتیا دکما جائے گا اورامی میں زیروناعدہ	زتب دمی ماسط کی چرد کمیس فرینتگ سکول کا دوگادس کا استخان باس کر حیکے ہوں اور عمد ہ م یک کشیدل میں ترقی باب ہوتے	فهرسته ۲۰۰۰ میکنند اسکام بود ایک اموال - ۸ دا، برایک مشکل میں ایک کا د وانلکس و فاجع ۱۰۰ بر داذیک کند شید بان کی فیرے	بهردوما حباديا كمادا سطح عس اختمادن باموتولوشي ألميكوميزل فسيسلركوس ستجرير	باآتناق داسترفرا ودون كرامسته اسماكون كالاستحان بإس كمسب فيمنا إيك اودلوقو ويناجا سيشر الكركما إسلير معائبرش ان	<b>A Q</b>	
ین ناکار چے آس کا نام دوبارہ فہرست مکورمیں دیرج نہیں کیا جا ہے کا جب بھک کرمیز کمڈنے اور مِنْ جل کتول	ار مرفیک مکول میں جیسینے تک اس کا تلوم سال کی ہوجائے گی، بوکنشیس فرفیک سکول میں مندق المیقت مال کرپے	كنشيبل كاناا الممة لمرست بين درن بنيرك باسته كلحتر كالمعجوده عمركويته للارسطة بولمسد فيال مجرك يعولى دلما وسلت في	اودانسز کمرکودس کی تعلیم بلیدے سے باہ داخلہ کرانستان عاقار کا کمی ایں وہ فہرست مب میں داخلہ کے بلے لبس ایں کہ پل کے	، كمكيسين انتخاب سے بہلچ سكول مكرد مني داخلہ سے بے المالع مرز موجا سے ، بو يا بندياں ديس خريثا كمكول ميں وذكرون	اولیت دمایر ایرکی بلالحالااس امریک فردست بلاانین داخران ارزی کاریز کار سیدا دراس امرک احتیاط کی جائے کاکرلولی 📲	کا اندازاج فبرست دمپ می بختر در مکاانسیکر میزان حلقه منظور در بوما برخ رمالع مرم اس متحد اسی مانند میں عبر من مدیکر و کا اندازاج فبرست دمپ می بختر در مکاانسیکر میزان حلقه منظور در بوما برخ رمالع مرم اس قسو که انتخابات میں عبر میں	انتخاب کی جائے تھا۔ کمیں اس شرفا زیرکروکاند شیل رہے نسا رہے نسال تالی قرار نہیں دیا جائے تھا جب کا کرام کر کرا انتخاب کی جائے تھا۔ کمیں اس شرفا زیرکروکاند شیل رہے نسا رہے نسا رہے تالی قرار نہیں دیا جائے تھا جب کا کرام کرے ک	خالی د قاجلیس کاتوں توں اس فہرت سے تعلقہ زمہ بات کی تعلیم یارنے کر لیے بولیس فرینگ کول میں داخلر سکے بیے	م ہو ہے۔ الی یا دلگر فعاب ہارے ناص کی مطبعہ یا سے سکے لیے مو	رمه رومرکودین کا دختار با مسلم با مسلم که مدون دن امید دارخوا از کال مرمو . زما کامید با ۱۱ رومیشا از مرمو	۲۰ ۵ ۵۰ ۲۰ ۲۰ ۲۰ تیک ۲۰۰۰ ۲۰ مرکز طرح مرد مولم	المتعادين المستعام محمد المتأسين المحمد المراجع	الس من درج توس کی منام میں کر م	ہوسنے سکانی ہوں ملح ہم سے بیٹ کردیڈ سکنٹ بلون کا تعداد سے بلاسے بلیں فیصدی سے لایادہ اشخاص کے ناک	قام ري كروان من الك مشيد و حكمام وريم حكم ما من تريم والد و حكمه مان بيدل كريد من ترق يب	فهرت المسترقىكم فيسلان بعيدة بشك كرشير العلاسه براكيب بيمثير فيف يومس الميني فالق مكول مي فرمت العث دفاديرم المسه ) . اللي	کی مورث میں ان کوباغ کلامی کے کورش کے لیے جنہیا مبار میں گئا۔	ليے دومخلفت مقانوں ميکنشش کام بر تعينات کيا مبالے محو- کمي سال کے تنشیق زائن مکمل کرنے کے مبدا لاینان تلبش ليدش	تعينان موكى وبلود مخرخا بتيت حامل كرسارا ومرتنا في كمر ولراد استبال يتيضي مع ديراكيك ومليده علياه عيرا مريم	بطودة الم مقام بهيكشيل ترقددى جلرتك لاورجوماه يمر في تتنب مب السيكثران كم محت ديبا في مقانون مي بطور مخرر	کوتر ق دی جائے کی بوتا ہتے۔ کے درم میں بہلی اور دومری بوزینی مامل کریں ، اخرابجادی خدکورکی مغابیش پرہلی مرتبہ	بجيجا بالمفترض والانكفيدينان كوتنهول فيلؤكركول كودس كمدامتمان ميل طيرموليا تابيست دكعاني بموا وربالعمدم إن لمشيئلان فلي	دد) ناشب کورش بین ماه-۱۰ س ترتیت سک ماتر مردم دمیورف المیتان بخش مورند ای کامورت ایسکانشیس کولوژیکول کودس سک لیے	الودوديد في دئيساماه و: ٤، ٤ ينب الأن تحرَّودوماه (مر) اردو وفتر شل صول كام إكيب ماه و هارد بالن تقامز مين ناشب تحرَّر جارماه .	ترديت مے بيے بوگی اور اسمی کانام ليد شرق قم لاميں در ج کي بلد فرگا در دادست پشمر با حيلان ميں شدت فريون ايک بله درب ا	تحتست قراد المراكمارج لدى المراثي كمامناكتش يريهوكى - ترقى برائيست ميكرديث كانسيتنا لىفتمسب المرامط يمتعت سمسباذيل	دک لوٰبواد دامعرم این ترق مرب انہیں دکرولی کودی جا۔ مرکل تولیا قت کے درمہ میں ادلین مکرماصل کریں۔ تناعدہ بلاک 🚦	باد تودان دیکرد فول مختاخ مقدم تبیش کم نیزین ترتی دی جاسمتی ہے تنہوں نے دیکرد کی گزیبت کے دول پاخیر مولی ایاقت	الختان ادرخکان الدوترساترق الموا - ۵ العت منسیر موار ۵ د ۲ ) می مندد پرسرشیم پذیروریش مارل کا ترتیب کے	برتنزل بولى .		
 		. •.	2	2	S		- - (	す	· · · · · · · · · · · · · · · · · · ·				<u>.</u>	• •••	•		••••		•										) ;	, , , ,	-	

(م) افران د پودش کنده کا نام ا در عميره عونا کاشپ بلوا کرمي سرک يا کن کرکستخطوں کے ليے جلائون تريفكمن طرج مخلعت فراكعض كومال بذامين إنبا بخرك كوه دؤدرى تكسيسيح ومياسط-خلاف ديودنون كإخلاصرا فسران مستكتر كويحرميتى لحورمر ديا جاسبے كلخا جبسيا كا للماغر كما تراسك يركسنل ذائل كرمامته منسك كماجات كلوان ويودقون كوا فسران يستقتر بمسيتيني فيرجيران بدايات لفطن کمکان کا درواق اس کے ناائل مجر نے یا تاکم کوش چلن ہو کے لیے باعدے پڑھورک مل کے - اے اور بنی دنیدول سی دیود کمپق :- وہ دپوٹی ہی جن میں پر منازش کی جا تی ہے کرانڈ کو ترقی میں نظراند از کر دیا جا نے پا اس اسے دیودطیعی : ، انہی دیودگیرجن جن جن حاص وہو پات کے با حدث یرسنا کرھ کی جاسے کرتعلی نظرتس ملازمت وفوكاذكر نجاب كودنسف كممركل نمبزا سمكم بمرايبه جل جالحوالخاص دكعا بملسف كلم-اكرعام طودمير دواليبى دبودشيس کے ددران مجلایا جاسے گھا اور اگر ریزادانکن ہوتو بر دیویتر پر اکسس افترکومللے کیا جاسے تھا۔ بخریری دکسسیز دمول حاصل ( ممامنتک د د باستخریرکی جامین کرکمین امیری سفا دش کامنی مے . تسام می د فور کو کامتوم ستلقه انسرکی ذاتی ملاتا ب المصان که ذفترین اسی دمیر مشکاک شخاک بی پذخل کی جارے کل چنیتراس کے کرا۔۔ سینسٹیا زر آن سیل قالم کردہ مطابق قاددہ پنجنب کودنسف مرکل فہوا سکے بیرا یہ میں وہا بڑا ہے اور میں کک دسید حاصل کر سکہ ان کی برسنل فائل میں ہراکی دوہرٹ کے ماہمة اس دنیر رضی تلتیٰ کا ایا بھی منسک کریں گے۔ انسپکڑ جزئی جربھی داسے اصل دیورٹ پر دی دم، بېزنونش ما حبان اينے مانخت کر فيلو المسران سميتعلق خنيه سالار ديورمين فادم مود - ١٥ ايے لپر ميلا پکولان کامودتوں میں فولی اسپکر جنرل پیش کردہ فبمستناقيف كماتنام أشبكوان اورسب انسبكوان كادبودس وتيجا انسبكويزل حارفر مدماتك انسبك يوزل كوادسال ادران المسستنث مسب السيكران اور سبب المسيكولك كما دليرمي بوفهرمت اليعن لرنتهي المي اسينه ابنيه وفترين كتيرين ب المعدد فنيرديوشي الموا- علادا بريوندف كوابية ماتحا تانا علاك كالأكروك في باره يل فادم ١٢- ١٤ يرمالا وديوشي ۹د بزدی نمک فرخی انسیک فرمزل کو بیمیماکری گے -فوٹی انسیک پر بزلی ان دیو پولوں پر لسیٹے دیا کہیں د سے کرانے بل دبوددگیں ۱۰ وہ دبرتری بن میں مناکش کا با آہ سپتے کرتر آہ نشرم طاذمت کے مول کے مطابق دی بائے بیچ دی کے وقیق کم میں الماض فور بہندانشا سے کومنارش کر دہ افروں کا قابلیت کے بارہ میں انجناحی المب کا کا بالمان کے لیے جب دنی المب کورا ہو ملتریں فہرت الان کا کارم ہو ا تەكركى دېچادلىچە چىزلىكى ماەتىنىدىكى مەرتارىخ كىكىمبوادىنى چابېچى . دېچەدلىپكە جەل اينى دائىڭ ئالكرى ي نواترا ثين توافر خدكور كميرخلات خودنجود بركامكما دكالدوا لثمان الزاباست سميرتعلق شروع بومباسف كاتوكم د ۲ باد پودتیمه قمین تسم کا بول کی بغینی اسے و لما ادرسی اود انہیں اس خرج مکھا جلسنے کم زہو توانسیکو جزل سے درفتامت کی جائے گاکری درمرے ملتہ سے ادبی متردک جائے۔ رب می کرافرسک لردي مكربجزل لالمن سكرانسيكوان اورفيهمت ايعن سكرمس أنسكم H- KY (1) كما المقرار الحرك نيك وفروا لي جيما ما م ده)داپورٹ لمندہ او ינטייט ונים אכט الإلااس ليخد بخعوص کمکنی بود، خالی بود، قوان کوقاعده ۲۰۱۰ میں مقردکرده امولوں کے مطابق فہرست العین سے بلدو بید ترتی دہ، تقدیم طازمنت فہرست ایعف میں اسی تاریخ سے ٹھارکی جائے کی قبرت تاریخ سے اس فہرست میں اعرنادہ 🚦 تبجتريزل ان المبوت ل بحال اور المي كم ارد على جن كوتيل اذي فيرست خدَّو من راغل كما كي بهوخان ا شین بستل فاکل سکرمات المکا وسنیم کا منبرد ورثوں سکرعلادہ تام اندوا بات کاخلیں جرماک ویتل فائل برالگان ودوثي السيكويولوا بخاطون سيميزنين فساواطلاع وي مكر الاسب المبكوان كاجواس فبرست مي درج بون المل د۲۰) جب فهرست امید می شنخ ناموں شکراندارج سکنشکق مقادشات ادمال کی جائیں قوامی کے ما بھ ہی ک ہ کم ہوانسیکڑ بزل کومدا نہ کی جائیں گی تاکربلور کیا ڈوامل برس انڈل کے ساتھ لکھوی جائیں ۔ تمام لیچائعتول کا نأسبست فلوم ۲۰۰ - ۱۰ یورتیاد کاکی تہوں کا تی جی کی طرف سے زیرِقا عدہ ۲۰۰ - ۱۵ دامپری پر وی کا ڈدلی تقلقدا فزان パロロオーロ ل سفادتُات بحماميميمي سمح-ان مغادتُوں کے بہراہ منعس خنر دبودوُں کا ہونا خروری نہمیں-اِن مغادتُوں کے دفاتر و چمان پکو بزل میں دیمی جا سے گی ۔ بعدک تمام سالاد نعنیہ دبود ٹوں کی فعّدل جرب، انچسکوادں منددیو فہوست بیکود ک یسنل فائل قاعده ۲۰ ۲۰۰ ماری مطابق دفتر (نسپکورترل میں دوارد) جا میں گی۔ ان کی دومری کا پی تیار کرنے سے دید | پ در بتک مالیمی گے۔ لیکن یہ فہرست شائع نہیں کی جائے گی -ان کی نسبست ڈپٹی المبکی ویزل کو اطلاع دی مبا سے گی د۲۰۰ سنادتن کرد ۰ افرون میں سے بچن کوانسپکٹر جزل موزوں نمیال کرمی آن سکرتا تر تی ایندز دفادم ۲۰۰۰ و۱۰۹ افران مچرکمیں شکری کوتا مدہ ۲۰ - ۲۰ پی ۲۰ محتمکی تقوَّیا سے کمسف کا آختیاد دیا گیا ہو۔ ایسی ٹالم متنا برترق ل مستلق 10110 کے بعد نہرست انیف بٹی ددرے طرہ ا فران کے کہا کہا کھاں میں اور فہرستا نواڈ کرسے ایں اشخاص کیے نا موں کے اخراج یے گا۔ جب دویانہ یا دوسا دبنوں کوابی تاریخ کا فہرست دادین میں داخل کیا با سے توان کا اپنی سینا رق کے وکلح یجن سب السیکٹوں کو ایعف فہرست میں ایک پری تاریخ میں داخل کیا کمیا ہوا نہیں فہرست خدکودہ میں ایک کرلج زی کام ترک مالیاں مادمی طودیرمالی چوں ان کافہرت اییب سے بلورتا تم مقتام ترتی و کے کر وہ ومول ہونے پرانسپلریزل حوبا فی فہرست پردائے ڈن کرمیں گھ اورنا موں کے بحال رکھنے یا خادج کرنے کے انیکڑی کے دوجہ ترق اسما - ۱۹ دا، عہدہ انیکٹری کی فیستقل آسا سیاں ماسوا نے ان کے بو پر دیٹے الک تعرّدی کے ومهماجمل افركما فالم فيميرست اليعت مي ددرتا نرامح أسب المسيكويز كماكما خام تنظورى كمير بغيرقائم متطابات یڈیکستس ترق کمانا ریخ ایک ہی ہو ہوانہیں ٹالم سکیل بوراستس ترق کمانا ریخ کے معابق تریز په دکهامهاست کابس تاریخ سنتران کوتر تی ببیشل کریژمی دی کی بو آکردد یا زیاده مسب المپ دہ پن انحکاما ددکریں تھے اود رائنہ ہی اپنے نیعلہ سے ما میں ڈپنی انکیلر بول کومطل کریں گے بر فوراً بعد بهرسال فه يا ذخلت فريا فرده اكتر بركما ميلية عن المسبك ويترال كويسي وت محر - ---میرست المحاتمنی قاعدہ ۲۰۰ - ۱۶ دا) میں مترد کردہ العولوں کی بتا پرک جامیں گی اور قاعدہ خکور بربومهده المسيكمرى يمكنا قابل ابرشيورسا وي بهز ، تعدیق انسپاریزل بزات نود کرمی سک سلابق آف کے نام درج کیے جامیں گے دما) علماه السلم 5173 2



فراده فخواه بأنا بوكا وهائدنيا لاكم متناصدك ليركم تنواه بإلى والمله تتاعيده افرسير متعدم خماريوكا يكيك سلام الملحاب لإداءا الميران بولسين بدايات مندرجه بابيته بولسين فرول مينولل بتجاب المتلالير اودمندرج ديل خاص بدايت ن المراسی یجندہ کے مشتک افسرے ناقق ہیں بچھاجا سے گا خواہ وہ قالم متاکی کما دادست کی طوالتیں بنيده المربلا لأعرب مينشر بمرب سكر- اوتان بطارير تراتو بماميره لما دیے ہوگی اور اکریکی تعرّریاں ایک ہی تاریخ کے کرزش میں شاکع ہوں تو پیکر ترقی یا فترا مغرابینے عرصہ طازمت سکے للنظ كمنزياس سيادا رمید طور طور ایکی محلی دوران اجلاس اجمع ابب اورپخاب هودنده سک دورا دکو تهادموقوں پر مامواسے مواقع منددیوشی فاعدہ دیچا و دد ) مبغ چورے ہوں صدر پاکستان، بالممين سكر وداعف ، بيلز فيرل سے بالاعهد و كم تمام يوليس المدان سمق بين كدان سے كم عهده دوک پہنچ ہوئے ہوں حسب ا کملام بالاسلوط کرمیں گھے اوراس کے علاوہ انواح ہرمی ۔ بحری و پہوائی کے تزلزل ن وہوا تی سے بوالی سے عمیرہ بڑی پالا ترمیں بخالب وللمخنظ شره كولاذم جمكر جبب كبعى وي تره شده المسران توتس جب دکادی تقریبات پزتیلار میں تعییثامت ہوں اوران کے پاس سے کو بٹی ایسے اخران گزدمی جرائی کی ملاکی کے مقدار دست مما طب بوتومجرط بط ملاكاتي تقاتق أوكل وج إمام يهدون سكالوليس المعران جيب ليرتز يربون بي واستجب كدفرق انجام ويحاش سيراسي الميسيحص لے دول اس کی فوتیت مراتب گزشہ میں اد، کی تقریری کی اس عدے کی تاریخوں کی ترتیب کے یک یاد میراسی تسمز کاکالی توقیلہ ذف طروا فسربوليس تجرفونيث علاقتر ستعطرود علاقترسك اخدر فيزعدا لحتت ميم يجب بمجلى مخاطب جوايا مجره يطاعلاته ديكا وإلمست برم إحلاس إيوتوبل لحياظ دتيرمدارت كمنده علالتي اخرموجوده الوقت عدادت كوسلوف كرسامجا بحوغ کران بلی اودایل افراد کی خدمت میں ساحزی کے بوار سوا افران اطلاکی خدمت میں ماحزی یا مرکادی طلبی کر ملسا میں وسی اودایل افراد کی خدمت میں ساحزی کے بوار سوا افران اطلاکی خدمت میں ماحزی یا مرکادی طلبی کر ملسا میں لول المذافر (النا لولس تاسيد احتلام مندرجه فتر ۲۵ المجود) شرق ما مرتبرا سجا نب محدد نسف بها بسبا پریمل برادس کے سند متصالي بيرأنك ستع نخاطب بهول يتبسيمي كوأن يولس افسرود وي يينج ميحرسري كماعدالمست قالون طيل واخل يهوجد С С ہوہ کہ پالی کے پہم ارتبر پھل جب وہ ای سے پادان سے کا طب ہوں تو ان کو کر ہے کریں گے۔ پی 10, j للنجيبلان بدايامت بالابيكل كمرسك سمط علاوه تماحجن طرشده اختران مول كوميى سلام ہوں توان کوسلوٹ ہوں کریں گے دیکہ مون اٹن شن کا بوزیشن میں کارے دیں سمے دلی سر کر دسین السران میب دردی می كوكمكا تجزأن ستعتجده يثب بأللاتك وربأ ودرى بمزن يثرتنام إفراك بهول كويعى متجانيين ایول با بالاتریم ده مندا فسران خدکور ان سندمخا طب بول توان کوسلوشکرمی برا تتغفا ودمركادي تقريباست بردليي إيماقنكم ويحريهمك مبالسقركي را فسران يولسو بس المربط لحاظ بمبده ج کالوکری پرتینیات طرہ ہواسین افسرسے ڈا لیالودیرانی المب ہو وددی پیٹے بورنے میں اعلیٰ مول افسریا افسران افراق بحری ۔ پر سمكخا لمب بوما يرسب ياوة فنسما ليسيه ليمس المرسيري اطب يو مٹابیس الحسران آ بہیں سلام کریں وب ) تمام بمبروں سے بی لما لخاست سيوم شطحا ديميان المحا ومرالنا المسكم ليعد برل ومداسبت بمتزدة دلما برمامور امو ومسج مسلامی کمرین دارمنس کو سلامی نہیں كالموشاكري لمكرابنجن بإسط واحشيس قوانين سكرائه وتبرست لوياده تواه بكاكبول مديار لم يو-دوم) باوجود محاام مردوجه بالاست منابق ) ۲ ديجا مغرث بركوا يرملابق سلام ليا ومكالمريمة أزمانه

Ŋ

ک انسران ان آمام ایم میردا نسران پرفرتیت د محته این بودوته از بین میں بوں اور اکنپی میں ان کی فوقیت این تقدم پرش بوتی سبسے بچدا نہیں بیٹرل گریڈ میں مامس سپتہ بوا نسران سی عمدہ میں از ماشی طور پنجاہ براہ الست پی ركود كمه بالمبندين اورا نيس بيا سيني كرومران ست داخلت بون قوا ه وه مجروم قرا عدد ليسي بين دبهاريت كين مين بر قادن و دانچنا برکان که فومتیت اس مزونت کر لما طامند بوگی موانین م شقل عبده میں ما ملی منید میدش مدج 🧱 قائدا بتخريف ميثرك ادريدة يترشر يولس مثيرك ومولمك تشركان كوخاص ترتيان [ معا ١ - ١٩ و ٢ بحرك شيول كوق كرايتكم يوليس ميثرل حطا كام اكمنك مثلاً بوقت يجيوز عد قابليَّت إفر خاكور كالتعلَّق خاص خود يريريج يريونا جا ميني كم 11 كلا احيضاما يخالفون كالوم يؤخير فشاليسي ميثول معلكاني تيا ترو (اكروه بيلي بركابتشل كمرطي مي مزبو) است جيساكرتا يوه متؤدکرسف دالاحاکم مجاز بر ایکسد صودت شک ایکسدخاص تنکرک ذولیر تاثم متنابی طاذمت سکتام مداو آذما المشی یوجرین شاکل کرسلے کا تعلم وسے دسے - آذ ماشی یوجر سکے اختتام پراس ماکم کے پاس دیودشے کی جائے گی جیے ترقی کوستیش کررلے فاللالة في دوم ما حام مدا تمام المران يوليري بن كوم بداه عيما ترقى وى جائد ووسال يمك لديرا و ماش د مير مرك، ربشويك مقدًات کما ہتیت کا جامنوہ نے کرامی کا توالہ دیا کرمی کے - دیورٹ خکورمی الیمی دائے ہوگی جوکر توکر کی قدت بھی دده بواخران قاتم مقام المسامير دد پرمامور پود وه ان اساميون کاعبره و فوقيت بمعن مزمدة فالم متامی کمپ افتلاً الل كومط جداس باب مين طوزهل كرستلن بعدن قواعدا قواعداتن طوزعل طازمان مركادى ادريتجاب محول لمندف دداييتر في سور سك جائين الن كى فوقيت مواتب بالافراس عبده مين مشلق جور ليك تاريخ كير لما ظاريب قرايقاً كادىكى مانندانسران بولسي قرائلا بکشید بل که بهادانیی ستشک کا سالی پرقرتی دی مبارشه گی بواس طلح میں واقع بهتری چیں دوہ میڈل خکود وكلاكروه يحمصه لماكود کمان دقترم (مجارادا، پولیس افران سکه این کمان وتقرم دانست ) تقدم مهره وجب ) تقرم ددورک لحاظ سی تخط -5-640 فانتياد جامل سيز-جائم مكور ياتواسة مشتل كروسة طخايا لمستداس كاما بتراكهما محابير دابن كردسة تحاييم دما بختاط مرکند و مان افسران کویکها مذکلار والی سکربغیر کمسامی پر دانیس کمیا میکناً سپتے۔ دمن ع پامالت میں جن آزمالسی بحرصر دوسال سیے سچا وز نہیں ہوگا ا ورستقل کنند ہ حاکم سے لیے لازم ہو ه دول تکمنی لیسکر کرد سے کو کا از از کماکورکوستسکی کردیا جائے دا اسے ۲۰ کے ما تقریمہ میں پر الفل طووطرت فا DISCIPLINE & CONDUCT فمجوهدا صكام كمتنى مصحرا لأكام بولت سكرليه فمتل كمك كثيثه بين وركير طازمان م ۱۰- مه کاخر من کے بیلے مزیر ترکر ترک مقسور مذہوری - ماعدہ باک بیٹ کر بیٹر میں تر ير عاكمتوس مو كاران يرقواعد ١٠٠ - ١ اور ١٠٠ - ١ الحا طاق مورما مع. مطابق کما کوف میں اشاعت کے نیوضدمت انجام دسے دیا ہو۔ درگوام سے کیسے لسلڈات ڈی اور دیا نرت دار مکامیں سے -فدوبراست كمي يون 

# BEFORE THE PESHAWAR HIGH COURT BENCH ABBOTTABAD

P. -(]

1.A.W. 306 A/ 2012

(1) Quim Ali Shah Head Connable NO 281 (2) Sohail Head Constable No 283 (3) Waheed Murad Head Constable No 253, District Torghan

D.P.O. Torghar.
 D.I.G. Hazara Range Abbottabad
 Ayaz Khan Head Constable NO.254.....Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTIO ISLAMIC REPUBI PAKISTAN ARATION THAT SELECTION OF RESPONDENT NO.3 INTERMEDIATE COURSE BY RESPONDENT NO 2 IS ARBITRARY SCRD MNATORY. MAT FANCIFUL AND WITHO AWFUL AUTHORITY AND JURISDICTION OR ANY OTHER ORDER WHICH IS DEEMED APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY GRACIOUSLY BE ISSUE

Respectfully Sheweth!

1.

 $\mathcal{T}^{(i,\mathcal{O},\mathcal{O})}$ 

The brief facts leading to the instant petition are as follows:-

That, the petitioners joined police department as constables and thereafter they were sent to their respective training at P.T.C. Hangu, and they qualified/passed the said trainings.

That, the petitioners after having been declared successful in their respective maining came back to District Manschra and started performing their

Certified to be True Copy · Exanie Peshawai Figh Court

That, the petitioners were selected for lower School . Course and they joined the said course at P.T.C. Hangu and also qualified the said course.

З,

4,

5.

б.

8.

TODAY

Apposial

A WIND FILED

5 i T-

1- 40

-41

That, the petitioners after their return from P.T.C Hangu joined their duties at District Mansehra.

That, after the settlement of Kala Dhaka into Torghar, the pelitioners were sent on loan to District Torghar, where petitioners served as such for about 9 months. (The copy of order sending them on loan is attached as Annexure "A").

That, the petitioners submitted an application to respondent NO.1 for their absorptions on permanent basis and accordingly the petitioners were made permanent at District Torghar by respondent No.1. (The copy of order is attached.) as Annexure "B"),

That, petitioners were sent as L.H.C. at Torghar aud respondent No.1 passed an order vide which the petitioners were promoted as Head Constables. (The copies of orders are attached as C.1&C.2" respectively).

That, respondent No.3 who was than serving as L.H.C. in District Abbottabad was transferred to Torghar and he was promoted to the rank of head constable by respondent No.1. (The copies of transfer and promotion orders are attached as Est CourAnnexure "D&E" respectively).

Certified to be True Copy วิจเทยไ È Peshawar Augh Court Abbolianad Berch Authorized Under Seca734

That, a seniority list of head constable of District Torghar was prepared by respondent No.1, wherein petitioner have been shown at Serial No.6,9&12 respectively, whereas respondent No.3 has been shown at Serial No.14. (The copy of seniority list is attached as Annexure "F").

P-(3)

That, respondent No.2 passed an order vide which respondent No.3 has been selected for intermediate college course on 09.04.2012 vide order NO.890-92/OHC. (The copy of selection for intermediate course is attached as Annexure "G").

That, the petitioners have no other efficacious remedy except to approach this honourable court on the following amongst other grounds.

#### <u>GROUNDS</u>

That, the petitioners were sent on loan to District Torghar by D.P.O. Manselıra, where they served for about 9 months, whereafter, respondent NO.1 passed an order vide which petitioners have been absorbed/merged on permanent basis in the police department of Kala Dhaka.

That, the petitioners were sent as L.H.C. at Kala Dhaka where they were promoted as H.C. and a seniority list was prepared wherein, they were shown at Serial No.6,9&13 respectively.

That, respondent No.3 who was sent as L.H.C. and he was promoted as H.C. subsequent to the promotions of the petitioners and thus respondent NO.4 was junior to the petitioners for all practical purposes.

Prilled to be True Copy Examiner Peshb Well Viell Court Autoritabed Bench twinning winder Sectors Bridger State Sectors

1.213

Addition

10.

11.

B.

That, according to the policy laid down for the absorption/merging, an official from another District, if sent to another District at his own request, will be placed at the bottom of seniority list irrespective of his other qualifications, but in this particular case the very basic law/policy has been blatantly violated by respondents NO.1&2. (The copy of the policy is attached as Annexure "H").

P-(4)

That, according to the policy so laid down, it was incumbent upon respondent No.1&2 to have selected for intermediate course officials who had been absorbed on permanent basis and promoted much earlier than respondent No.3, but for reasons best known respondent No.3 was selected and petitioners had been deprived of a right so arisen to them.

F.

T.

erillied to be True Copy Examiner Doshawar righ Court Abbottabad Bench Automiabe Mider Secars Aris Ordina

Į.

That, the petitioners have opted for a backward and far flung difficult District of Torghar with the sole object to have a chance of promotion, but such chance of promotion was taken away in an arbitrary and fanciful manner which per-se is a malafide on the part of respondent.

It is therefore, most humbly prayed and requested that on acceptance of writ petition the impugned notification/order of selection of respondent NO.3 for intermediate course be declared without lawful authority.

dar Man

#### INTERIM RELIEF

It is therefore, most humbly prayed that the operation of impugned notification/order of selection of respondent NO.3 for intermediate course may kindly be suspended till the disposal of writ petition.

- 5

Dated: 16 . 4 . 2012

Qaim Ali Shah etc. ....Petitioners Through m Ammali UHAMMAD KHAN SHAD ADVOCATE SUPREME COURT OF PAKISTAN (MANSEHRA)

#### VERIFICATION

This is to certify that the contents of foregoing writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this honourable Court.

: ; , ,

Dated: 16 . 4 -

17

Waheed Murad

be True.Copy Certified Pesliawai righ Court Exar Abbollabad Bench Man Dorge Vander Sesal & Aola Oron

TODAY

ohn 15

Additions Hesistrar Peshawa. Hish Court Abbottal ad Binch

FILEP

### BEFORE THE PESHAWAR HIGH COURT BENCH ABBOTTABAD

Qaim Ali Shah etc..

### VERSUS

D.P.O. Torghar etc..

.....Respondents

.....Petitioners

## WRIT PETITION

### AFFIDAVIT

I, Waheed Murad S/O Noor Ur Rehman, resident of Mohallah Dab No.2, Tehsil and District Manschra, do hereby solemnly. affirm and declare that the contents of foregoing writ petition are drafted under my supervision which are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this honourable Court.

Dated: 16 - 14 - 12

Waheed Murad ......Deponent

Surtifique to be True Copy

TODAY

國家主要及

Aunstand Wider Beselfs Acts Ordins "17712:2010 Mit And Anton Mit Court Aunstand Wider Beselfs Acts Ordins "17712:2010 Mit Anton Mit Anton Mit Con St. Aunstand Wider Beselfs Acts Ordins "17712:2010 Mit Anton Mit Con St. Aunstand Wider Beselfs Acts Ordins "17712:2010 Mit Anton Mit Con St.

abacel millrall Noor - UR - Lehoren motallah Qaro olo 2 DUST manse

9-6-S

### BEFORE THE PESHAWAR HIGH COURT BENCH ABBOTTABAD

p-7

Qaim Ali Shah etc .... .....Petitioners

VERSUS

D.P.O. Torghar etc. ......Respondents

#### WRIT PETITION

#### CORRECT ADDRESSES OF THE PARTIES

#### PETITIONERS

3

(1) Qaim Ali Shah Head Constable NO.281 (2) Sohail Head Constable No.283 (3) Waheed Murad Head Constable No.253, District Torghar

#### RESPONDENTS

- (1)D.P.O. Torghar
- D.I.G. Hazara Range Abbottabad (2) (3)
- Ayaz Khan Head Constable NO.254.

Dated: 16 - 4 - 12

Through UHAMMAD KHAN AFIR

ADVOCATE SUPREME COURT OF PAKISTAN (MANSEHRA)

Contined to be True Copy EXPINITE parhaven wigh Court Abboltabad Hench Abboltabad Secara Acis Odina AULIDIA

ិកាព

Qaim Ali Shah etc

Petitioners

÷ 46

BEFORE THE PESHAWAR HIGH COURT BENCH ABBOTTABAD

Qaim Ali Shah etc.....Petitioners

VERSUS

D.P.O. Torghar etc.....Respondents

#### WRIT PETITION

### LIST OF LAW BOOKS

The Constitution of Islamic Republic of Pakistan 1973. . Other law books as per need,

Dated: 16 - 4 - 12

1.

2.

Qaim Ali Shah etc. .....Petitioners Throug UHAMMAD KHAN YHAD ADVOCATE SUPREME COURT OF PAKISTAN (MANSEHRA)

CERTIFICATE

It is to certify that neither the writ petition of this nature so far has been carlier instituted nor decided by any court of law.

Dated: 16 4-12 Qaim Ali Shah etc. ... Petitioners . Certified to be True Copy Throug Peshaviai under Exemple 20 pench printe SHAD MUHAMMAD KHAN Abbolub 20 pench printe SHAD MUHAMMAD KHAN Abbolub and Factor Printe SHAD MUHAMMAD KHAN UPREME COURT OF PAKISTAN (MANSEHRA) Section

### UDGMENT SHEET

#### <u>IIGH COURT,</u> ABBOT JUDICIAL DEPARTMENT

W.P. No: 306-A of 2012 IUDGMENT ANIVEXLING

25-04-2012 Date of hearing...

Appellant(s)/Petitioner (s). Daim Ali Stah by Mr. S Respondent (s)......DP.O...Z.

PESHARY KHALID MAHMOOD :-J: WE ഗ

Cortilled to be True Copy

pooland init court Abboliabad Bonch Maboliabad Bonch Midde Stears Arts Brems

In

and wo others; petitioners, seek the constitutional ရှိ ကြို risdiction of this Court, praying that;

SThe impugned notification/order of selection of respondent No.3 for intermediate course be declared without lawful authority."

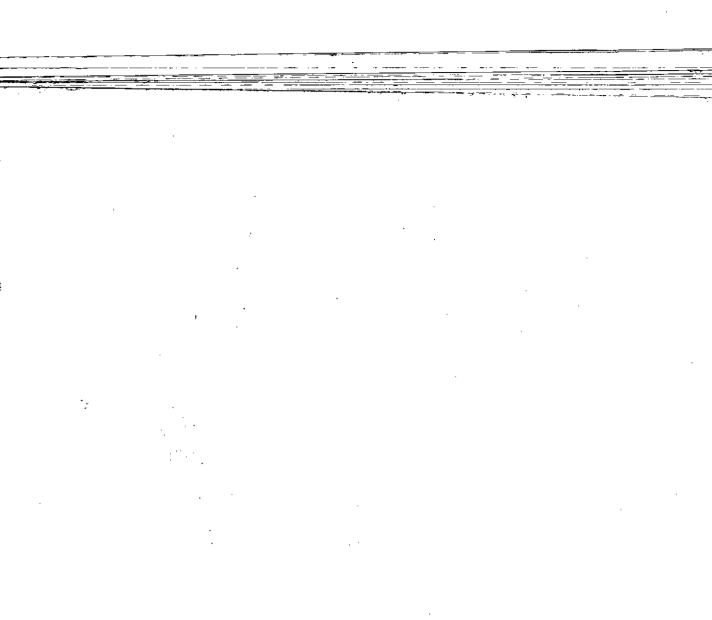
🚽 Qaim Ali Shah

The learned AAG present in Court in a different matter accepts notice of this petition.

Lest this Court passes any fundings, which may 3. prejudice the case of either of the parties, we treat the present petition as representation and be sent to respondents No.1 and 2 with the directions to consider the grievance of the petitioners in accordance with law within a period of 30 days, if not earlier, from the

receipt of this judgment.

40810



.



5. In case, the grievances of the petitioners are not redressed, respondents are to tender reasons for the same in writing and communicate the same to the petitioners and Additional Registrar of this Court, within the stipulated period stated, hereinabove.

This petition is disposed of in the above terms.

Announced: 25.04.2012

6.

Certified to be True Copy

Example Stand Stan



#### REPRESENTATION OF HC QAIM ALI SHAH NO.281, HC SOF AND HC WAHEED MURAD NO.253 PETITIONERS



In compliance with the order dated 24-04-2012 produced by surable Peshawar High Court (Abbottabad Bench) in Writ 1990 (Abbottabad Bench) (Abbottabad Bench) in Writ 1990 (Abbottabad Bench) (Abbo

II). (a) The crux's of the contention put-forth by the petitioners 1,2 & 3 (HC. Qaim Ali Shah No.281, HC Sohail No.283 and HC Waheed Murad No.253 respectively) in their representation alongwith grounds in the instant Writ Petition claiming that Respondent No.3 (namely Ayaz Khan, Head Constable No.254) was junior to the petitioners for all practical purposes and as a consequence thereof he should not have been selected for the Intermediate School Course by Respondent No.2 (namely RPO/DIC Hazara) vide his' impugned order No. 4261-71/E dated 05-04-2012 (topy enclosed at Annexure-A) which was amongst others also sent to DPO Torghar vide this office Endst: No.4272-75/E dated 05-04-2012 in so far as it pertains to DPO Torghar Memo: No.784/SRC dated 17-03-2012.

(b) According to DPO Torghar letter No.784/SRC dated 17-03-2012 the Serial No. of Petitioners and Respondent No.3 stood as follows:-

Name & No of Petitioner/Respondent

HC Qaim Ali Shah No.281 (Petitioner No.1) Serial No.6

HC Sohail No.283 (Petitioner:No.2) Serial No.9

. HC Waheed Murad No.253 (Petitioner No.3) Serial No.13

IIC Ayaz Khan No.254 (Respondent No.3) Serial No.14.

(c) Vide this office Endst. No.4272–75/E dated 05–04–2012, DPO Torghar was advised that the case for selection of Intermediate College Course is returned with the directions that it may be prepared in the light of directions received from PPO Khyber Pakhtunkhwa Peshawar vide Memo: No.9430/E-I dated 08–04–2009 (copy enclosed at Annexure-B). Subsequently DPO Torghar furnished a recommendation vide his Memo: No.872/SRC dated 06–04–2012 (copy enclosed

Page 1 of 4

HC Ayaz Khan No.254 (Respondent No.3) Serial No.5

months):-

(Note:- The Head Constables Khan Alsar No.268 at Serial Mo.) of the seniority list was overage and HC Abdul Sattar No.4 at Serial No.2 had earlier been compulsorly retired by DPO Torghar.)

(d). Based on the fresh/revised recommendation of the DPO Torghar Respondent No.2 (DIG Hazara) issued Memo: No.4424/E dated 07-04-2012 (copy enclosed at Annexure-D), whereby the following three Offg: Head Constables (on promotion list C-I)were selected for Intermediate College Course in PTC Hangu commencing from .14-04-2012; which is still in progress(total duration 06

	S. No	Name & No.
	1	HC Abdul Ghafar No.94
	2	HC Bashir Dad No.31
••	3.	HC Ayaz Khan No.254

III). The DPC/DSC constituted vide Memo: No.8291-94/E dated

The relevant Police Rule which governs the promotion list "C" is PR-13.8 of Police Rul<u>e 1934</u> (copy attached at Annexure-E). This is to be r/w PPO's Khyber Pakhtunkhwa Mëmo: No.9430/E-I dated 08-04-2009.

The policy referred to by the petitioners in their instant Writ Petition. (i.e. at Annexure-H of the writ petition) is a Memo: of the S&GAD (now Establishment Department) of the Khyber Pakhtunkhwa Govt; which is only relevant to the officials who are transferred from one group/cadre to another (i.e. It pertains to deputationists and their permanent absorption in the borrowing

Page 2 of 4

department), in the instant case of the petitioners, they were and continue to be in the Bolice Department (whether in Mansehra or Torghar) and none of the three politimers (namely HC Qaim Ali Shah No.281, HC Sohail No.283 and HC Waheed Murad No 2534 have changed their department group/cadre. As such the policy referring to all Annexure-Hill of their Writ Petition does not apply to them (their terms and conditions of service are governed by the Police Order 2002. Police Rule 1612 and £80 Rule 1973).

the criteria for selection for inter College Course is solely based on the seniority is Not as per list "C

No.

Vic Hat ame coloria for placing a Constable who has qualified Lower School Course to be placed on list "C" is as per the "order of merit" of PTC Hangu treference PPO Khyber Pakhtunkhwa Memo: No.9430/E-II dated 08-04-2009).

(b) If a constable from FRP is transferred to District Regular Police his name is placed at the bottom of the same PTC Hangu Course

If a constable comes from another province (Inter Provincial Transfer) his name is placed at the bottom of list "C". νb

The beliuoners namely HC Qaim Ali Shah No.281, HC Sohad No.283. and the Waheed Murad No.253 qualified Lower School Course during the terms ending 20100 2000, 20-09-2010 and 20-03-2011 respectively during their posune a Mansehra Districi, Whereas respondent No.3 (HC Ayaz Khan No.254) qualitied the same course during the term ending 20-09-2006 during his posting in Ale and a Deduct. As is evident from the above HC Ayaz Khan No.254 guale of these verys earlier to performer No. 1.00C Qaim Ali Shah No.2811-04 year same to Petitioner No.2 (HC Mullammad Sobail No.283) and 4 ½ years earlier to Plant, mental of eliciwahend Mura J No.2533. As such as per the criteria mentioned above any where the Weiler Stond Senior in Promotion list "C 4" to all the three por el calendar

casely a may be said that District Torghar being a new District was  $\sqrt{41}$ suffering from teething problems which resulted in the initial incorrect preparation of list "C", which was pointed out to them and subsequently corrected)



departments in the instant case of the petitioners. They were and continue to be in the Police Department (whether the Mansehra to Torghar) and none of the three petitioners namely HC Qaim Ali Shah No. 281. HC Sohail No. 283 and HC Waheed Murad No. 253 have changed their department group / cadre. As such the policy referred to at Annexure-H of their writ petition does not apply to them (their terms and conditions of service are governed by the Police Order 2002. Police Rules 1934 and E&D Rule 1973.

(v) The criteria for selection for Inter College Course is solely based on the seniority No. as per list "C".

(vi). (a). The Criteria for placing constable who has qualified Lower School course to be placed on list "C" is as per the "order of merit" of PTC Hangu reference DPO Khyber Pakhtunkhwa Memo: No. 9430/E-II dated 08/04/2009.

(b). if a constable from FRP is transferred to District Regular Police his name is placed at the bottom of the same PTC Hangu Course.

(c) If a constable comes from another province (Inter Provincial Transfer) his name is placed at the bottom of list "C".

(vii) The petitioners namely HC Qaim Ali Shah NO. 281 HC Sohail No. 283 and the Waheed Murad No. 253 qualified Lower School Course during the terms ended 20/09/2009, 20/09/2010 and 20/03/2011 respectively during their posting at Mansehra District whereas respondent No. 3 (HC Ayaz Khan No. 254) qualified the lower course during the term ended 20/09/2006 during his posting in Abbottabad District. As is ended term the above HC Ayaz Khan No. 254 qualified lower court 3 years caller to petitioner No. 1 HC Qaim Ali Shah No. 289, 04 years earlier to petitioner No. 2 HC Muhammad Sohail No. 283) and 4½ years earlier to petitioner No. 3 HC Waheed Murad No. 253). As such as per the criteria mentioned HC-Ayaz Khan No. 254 stood senior in promotion list "C" to all the three petitioners.

(viii). Lastly it may be said that District Torghar being a new District was suffering from teaching problems which resulted in the initial incorrect preparation of list "C" which was pointed out to them and subsequently corrected.

Page 3 of 4

In conclusion the DSC/DPC is of the opinion that selection for the college Course commencing from 14-04-2012 was made on merits and the vances of the patitioners namely HC Qaim Ali Shah No.281, HC Sohail No.283 nd HC Waheed Murad No.253 are neither based on facts and are nor supported by Police Rules and as enunciated by the PPO, Khyber Pakhtunkhwa:

MEMBER

(HAFIZ JANIS) ...Deputy Supdt. of Police Legal/Investigation Abbottabad

MEMBER

(SARFARAZ KHAN JADOON) - Senior Supdt: of Police Coordination/FRP Abbottabad

MEMBER

(MIAN (AZA TIUSSAIN) Senior Supdt: of Police Investigation, Abbottabad

MEMBER (MUHAMMAE KARM KHAN) District Police Officer Abbottabad

CHAIRMAN

(MUHAMMAD NAEEM KHAN) Deputy Inspector General of Police Hazara Region Abbottabad

Page 4 of 4

Fax No:0992-9310023

Phone No. 0992-9310021 Fax No. 0992-9310023

The Deputy Inspector General of Police, Hazara (Abbottabad)

The AIG Establishment, Khyber Pakhtunkhwa, Peshawar.

XUR 04/07 /2012.

No. *26.52* Subject:-Memorandum:

Froi

To:

SENIORITY OF C-I HEAD CONSTABLES.

. /E, Dated Abbottabad the,

As per list attached of C-I LHCs who were transferred to Torghar District on permanent basis where they were promoted according to the date of passing their Lower Class Course as noted against their names.

Moreover, Head Constable Muhammad Zubair No.688 on list C-I has passed Lower Class Course on 20-09-2003, he was promoted as C-I Head Constable in Abbottabad District. Thereafter he was transferred to Torghar District on 28-04-2012 at his own willing.

Prior to this the C-I LHCs mentioned in the attached list who were willingly transferred to Torghar District and promoted as C-I Head Constables before the arrival of Head Constable Muhammad Zubair.

The guidance is solicited as to whether he is kept on the bottom after the names of those LHCs who were promoted as C-I Head Constables before his arrival in Torghar District or otherwise.

Deputy Inspector General of Police Hazara (Abbottabad) (AEC Dilawar)



ANTERS j Re Peshawar. The Deputy Inspector General of Police, atoc Hazara Region, Abbottabad. To. dated Peshawar the /E-II -30 /2012. No. SENIORITY OF C-I HEAD CONSTABLES Subject: . Memo: Please refer to your office Memo: No. 8658/E dated: 04.07.2012. The AIG/Establishment has recorded the following remarks on the letter under reference. Rules are clear. See PR. Seniority is counted from the date of merit order of lower school course. (MUMTAZ KHAN) Registrar For Provincial Police Officer, Afri Khyber Pakhtunkhwa Peshawar I's attac

# ANNEXURE-



#### DISTRICT TORGHAR

#### POLICE DEPARTMENT

Ollice of the DPO Torghan. No 19.32- /GB, dated the 1.5 /10/2012.

#### MINUTES OF POLICE DARBAR HELD AT POLICE LINES TORGHAR ON 05-10-2012.

After taking over the charge of the District, the undersigned on 05-10-2012, held Police Diabor in District Police Lines Torghor. Officers were asked to come forward and put forth their problems and proposals/suggestions for the improvement of District Police working. The following officers presented their Issues.

1. Mr, Shad Muhammad Khan SI (SHO Judbah),

SHO Judbah has requested that the strength of this Police Station is facing problem of cooking due to non availability of cook.

The undersigned informed/clarified the SHO that sanction of cooks has been accorded and cooks are being enlisted shortly.

2. Head Constable Naveed Ahmad & other Head Constables

The HC/Naveed Ahmod, Qaim Ali Shah, Niaz Ahmad, Ejaz and other Head Constables who were transferred to this district since long but not selected for intermediate College Course. They pinpointed/objected that most of LHCs transferred from down district after them have been selected. for Intermediate College Course and after taking on advantage of Intermediate College Course were fried for transfer back to their home district which is not foir and against the justice. They also requested that highups may kindly be approached that seniority list may be maintained in this district and LHCs received on transfer otter their arrival may be kept on bottom. They also requested that the period of posting of LHCs may kindly be fixed for 03 years.

The undersigned assured the Head Constables that it would be discussed with the worthy Deputy Inspector General of Police Hazara Range Abbottabad and he would try his best to accommodate them as per their request. 7

#### ADDRESS OF DISTRICT POLICE OFFICER.

The Chair in his address stated that we are working and living like a lamily, therefore, each and every Police officer lacing any problem may visit my office without any hesitation to explain the issue and efforts will be made to solve the same. The every Monday has been tixed as orderly room day and any upper/lower subordinates can approach the undersigned.



#### 1. Oiscipline/Welfore of Police Force.

Due allention should be poid towards discipline, any one tound violating discipline with be proceeded against departmentally. There will be no compromise on discipline. All out efforts will be made for the welfare of the Police officers. The afficers/Jawans should be well dressed/good turn-out. There should be no additional and unapproved badges or any other article with the uniform. The Government has already been made considerable increase in the solaries of Police force, therefore, we should work hard and honestly.

#### 2. Police-Public Relations.

There should be no Police alrucity on public, any one found involved in such cases will be deall with departmentally. They should be polite with the public and their behavior should be exemptally. The politicians should be given due respect but no under and illegal layout should be given to them. Any problem must be brought into the notice of the undersigned. The Police officers should create cordial and good relation with the cilizens. The Moharrii stall should improve their attitude and they should be polite with the public visiting Police Station for lodging reports/complaints.

3. Aleriness and Visibility of Police.

There should be Police visibility every where to create a sense of security in the general public. The Police noticing incident must reach at the spot immediately. The Police officer/Jawans on duty should be fully olert. Use of buttlet proof Jackets and helmets should be ensured.

4. <u>Poslings/Transfers.</u>

Postings/transfers will be made on meril basis. Use of political pressure or any other. Sedarish for getting choice posting should be avoided. The afficers and travens having any problem should come to my office to solve the same.

#### Copylo:-

2 The Deputy Inspector General of Police, Hazara Range Abbottabad for taxour of information, please.

DSP HQ torghor. > All SHOs.

- Lines Official 4-



District Police Diliger, 7 Torghar )

Phone No. 0992-9310021 Fax No. 0992-9310023

ANNEXURE

	ΓI	101	ņ	
	•			
•				

To:

The Deputy Inspector General of Police, Hazara (Abbottabad)

The District Police Officer, Torghar

No. 16430

Subject:-

07/11 12012. /E, Dated Abbottabad the, MINUTES OF POLICE DARBAR HELD AT POLICE LINES TORGHAR ON 05-10-2012.

Memorandum:

Please refer to your office Memo: No 1932/GB dated 15-10-2012. (Minutes of Police Darbar held at Police Lines Torghar on 05-10-2012 Para No.2).

The criteria already being followed i.e. seniority be maintained according to the date of passing of Lower Class Course. In this connection attention is also invited to PPO Khyber Pakhtunkhwa letter No.15019/E-II dated 30-07-2012 and this office letter No.8658/E dated 04-07-2012 (copy aftached).

ត៌ាអប់រំ

Deputy inspector General of Police Hazara (Abbottabad) (AEC Dilawar)

ealso mi ЙĊ the Her



The Addi: Inspector General of Police, Headquarters, Khyber Pakhunkhwa, Peshawar.

The District Police Officer, Torgar,

To:

No. <u>347</u> 1., Dated Peshawar the: <u>9 [10] 13</u> 12013. Subject:- <u>GRIEVANCES OF HEAD CONSTABLE OF DISTRICT TORGAR.</u> Memo:-

In connection with your office memo No. 438/PA, dated 10.04.2013 it is that under the Police Rules, seniority list of C-1 Head Constable is maintained at the district level and those C-1 Head Constables who are transferred from other districts to district Torgar on the basis of their willing / consent will undoubtedly will be placed at the bottom of the seniority list. As far as inter district transfers within the same Region, 11C's (ASI's on list-D and SI's on list-E will not disturb seniority because such lists are maintained at the Regional level.

In view of the position explained above the LHC's who have been transferred on the basis of their willingness to district Torgar be placed at the bottom of the seniority list.

Furthermore, transfers to Torgar on loan basis to be stopped.

P-60

Addl: Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar



E willing 858 build 3 (10- 75 BEEJON SHI AMA 2) Z Ign ILI SATTA TESTER And THE STREETERS piloidi per Africo 51/41/5 J-3/92081 17 EJ: 5106 50 ilscielmi Tilslandsvik arte ver esebidit 2 20 (2) yei 3) 20 ولي الم منه هذا مع المعاني من المعالية - sinsmand de le ju l'ad i de ster e siter 12 120 web-servinende - 2 20 5 3 2 6 nd) ev ev PIC de- 5 (10 D (- 210 EV J 22 and end 21 - S. Linsmond di Le J.S. (2) mig - mg ~ jog = 1 ~ ~ mp = nw ? Ep  $\frac{1}{100} + \frac{1}{7} + \frac{$  $\frac{1}{2} \sum_{i=1}^{n} \frac{1}{2} \sum_{i=1}^{n} \frac{1}$ - site is a site and a site a ut it is 'or ail ut eile loute u line second ELE MAJCOCA STO OFECT & SUD HOE'S Jours Juli and Elin we lide with turker Anton ( mrd. 7. xonut . 51518 er - d- 921 de- en sie 610

POLICE DEPARTMENT



ANNEVIPE

Post

DISTRI

SENTORITY LIST OF HEAD CONSTABLE OF DISTRICT TORGHAR ON BOTTOM.

• • •			JRITY LIST			· · ·		Date of	Facing .	Date of arrival	REMARKS
5. No	Name &No.	D/O Birth	Date of Enlistment	Edu;	Term Ending	Order	Date of Brought	Promotion	any Dep:		· · · ·
· .						Meril	on C.I. 01,10.2009	25 HC 19.12.2011	Enquiry	16.11.2011	
<u></u>	IIC Sarfraz Alimnd No. 280 V	10.03.1987	03.05.2007	FA	20.09.2009.	95	01.10.2009	19.12.2011		-16.11.2011	
2.	HC Qaim Ali Shah No. 281 👘 🗸	15.09.1977	28.01.2002	FA .	20.09.2009	(+)	01.10.2005	()		) .	
K	·		.28.01.2002	97	20.03.2010	86.	0].04.2010	19.12.2011	<u> </u>	1611.2011	
3.	HC Shehzad Abnied No. 282 🗸	16.04.1978.	. 28.01.2002			,				· · · · · · · · · · · · · · · · · · ·	
	HC Muhammad Sohail No. 283	01.01.1982	29.10.2003	MA	20.09.2010	81	01.10.::010	24.01.2012		16.11.201	
. 4.	HÇ Muhanin tad Soluti 140, 265				_		[	<u>_</u>	ļ	21.12.2011	
	HC Ninz Ahmad No. 67	03.01.1984	28.01.2002	FSC	20.09.2009	95	01.10:2009	24.01.2013		21.12.2011	
		··· ·		<u> </u>		175	15.02.2012	05.03.2012	<u> </u>	23.11.2011	
6.	HC Muhammad Arshid No. 140	20.01.1983	29.10.2003	BA	20.09.2011	1,175	10.02.2012				
		01.01.1978	20.06.2000		20.03.2010	. 17	01.04.2010	24.01.201.3		26.12.2011	
7	HC Ejaz Ali No. 163 V	01.01.13/0	10.00.000	}				 			 
<del>- 8.</del>	HC Waheed Murad No. 253	01:05.1979	28.01.2002	TA TA	20.03.2011	66	01.04.2011	24.01.2012	-	23.01.2012	
			· · ·					05.03.2012	<u> </u>	10.02.2012	<u> </u>
9.	HC Nascer Akhtar No. 272	01.11.1978	05.03.2002	FA	. 20.03.2011	77	20.03.2011	00,00,2012			
1	· · ·	<u> </u>		 	20.03.2010	118	01.04;20:0	05/03.2012	- <del> </del>	17.02.2012	<u> </u> .
10	HC Ways Khan No. 168	17.12.1978	28.01.2002		20.00.2010					,	
· ·		04.04.1980	01.02.2002	EA-	20.09.2010	40	20.09.2010	05.03.2012		01.03.2012	
11.	HC Senaullah No. 182									22.03.2012	<u> </u>
·   17	HC Gbulam Jan No. 191	01.05.1981	01.07.2002	10%	20.09.2011	6	20.09.2011	03.07.2012		22.03.2012	
12.						<u> </u>		20.04.2012		12.04.2012	
13.	HC Abdul Qadeer No. 209	(13.03.1981	01.05.2001	· FA	20.09.2011	214	31.01 2012	20.04.2012			
	· · · ·				20.09.2009	213	20.09.2(09	02.01.2013	<u> </u>	01.07.2012	
14.	FIC Malik Inniaz No. 269	16.01.1978	20.10.1999	10 <sup>th</sup>	20.09.2009		1 2000 - 100				.]
		· · .	<u> </u>	<u> </u>	<u></u>			_ <u></u>			

12         13         14         15         14         15         16         17         16         17         16         16         16         16         16         16         16         16         16         16         16         16         16         17         16         16         16         16         16         16         16         16         16         17         16         16         16         17         17         17         16         16         16         17         17         17         17         17         17         17         16         16         12         17         18         12         10         10         10         10         10         10         10         10         10         10         10         10         10         10         10         10<				• •									
13       JP Addy 2410 Ni J.       20       Color 198       Color 198       Color 2012       15       18.12.2012       Color 12013       20.09.2012         14       14G Addy Angel Ayez Ne. 213       14.06.1983       14012000       BA       20.09.2012       46       18.12.2012       Color 12013       20.09.2012         17       Hig Addy 24.00 Ni J.       17.06.1988       14012000       BA       20.09.2012       46       18.12.2012       Color 12013       20.09.2012         18       Hig Addy 24.00 Ni J.       02.01.1984       18.10.2004       MA       20.09.2012       48       18.12.2012       02.01.2013       20.09.2012         19       Hig Kahan No. 141       16.04.1933       05.03.2033       FA       20.09.2012       133       18.12.2012       02.01.2013       20.09.2012         20       Hig Mahamad Sajid No. 285       01.01.1985       15.10.2004       FA       20.09.2012       133       18.12.2012       02.01.2013       20.09.2012         21       Hig Mahamad Sajid No. 285       01.01.1985       15.10.2004       FA       20.09.2012       133       18.12.2012       02.01.2013       24.10.2012         22       Hig Mahamad Sajid No. 26       0.20.2.1975       25.09.1996       10"       20.03.2011						•						6°	
A.         J.         J. <thj.< th="">         J.         J.         J.<!--</th--><th></th><th></th><th></th><th></th><th></th><th>5</th><th>•</th><th></th><th></th><th>·</th><th></th><th></th><th></th></thj.<>						5	•			·			
13       JP Addy 2410 Ni J.       20       Color 198       Color 198       Color 2012       15       18.12.2012       Color 12013       20.09.2012         14       14G Addy Angel Ayez Ne. 213       14.06.1983       14012000       BA       20.09.2012       46       18.12.2012       Color 12013       20.09.2012         17       Hig Addy 24.00 Ni J.       17.06.1988       14012000       BA       20.09.2012       46       18.12.2012       Color 12013       20.09.2012         18       Hig Addy 24.00 Ni J.       02.01.1984       18.10.2004       MA       20.09.2012       48       18.12.2012       02.01.2013       20.09.2012         19       Hig Kahan No. 141       16.04.1933       05.03.2033       FA       20.09.2012       133       18.12.2012       02.01.2013       20.09.2012         20       Hig Mahamad Sajid No. 285       01.01.1985       15.10.2004       FA       20.09.2012       133       18.12.2012       02.01.2013       20.09.2012         21       Hig Mahamad Sajid No. 285       01.01.1985       15.10.2004       FA       20.09.2012       133       18.12.2012       02.01.2013       24.10.2012         22       Hig Mahamad Sajid No. 26       0.20.2.1975       25.09.1996       10"       20.03.2011				,	( <sup>1</sup> )	· · · · · · · · · · · · · · · · · · ·	·····	منهدهانه	····				04
16       HC Mulhammal Ayyu Ne. 213       14.06.1983       01.01/2003       PSc       20.09.2012       15       18.12.2012       02.01.2013       20.09.2012         17       HSC Abdal Mateen No. 173       17.06.1986       14.07.2009       BA       20.09.2012       46       18.12.2012       02.01.2013       20.09.2012         18       FCC Mulhammal Salevm No. 187       02.01.1984       18.02.004       MA       20.09.2012       46       18.12.2012       02.01.2013       20.09.2012         19       PSC Khåll ur Rehman No. 141       16.04.1983       0.503.2003       FA       20.09.2012       119       18.12.2012       02.01.2013       20.09.2012         20       HC Mulhammad Asif No. 285       01.01.1985       1.5.10.2004       FA       20.09.2012       133       18.12.2012       02.01.2013       20.09.2012         21       HC Mulhammad Sajid No. 280       0.20.21973       23.09.1976       10 <sup>m</sup> 30.11.2007       12       01.01.2013       24.10.2012         22       HC Mulhammad Sajid No. 280       0.20.212173       23.09.1976       10 <sup>m</sup> 30.11.2007       12       02.01.2013       24.10.2012         23       HC Mulhammad Sajid No. 356       V 44.01.1980       20.11.2003       FA       25.07.207       21.0				01052001.2		20.03.2009	<u>~</u>	20.03.2009	22.03.2012	<u> </u>	07.08.2012	1	7 <sup>7</sup>
B. P.C.M.Campinger, 1927-06, 193       P.C.M.C. 193       14.07.2009       EA       20.09.2012       46       18.12.2012       02.01.2013       20.09.2012         17.       H.G. Mulhimmad Saleen, No. 187       02.01.1984       18.10.2004       MA       20.09.2012       48       18.12.2012       02.01.2013       20.09.2012         19.       H.C. Khälf ur Rehman No. 141       16.04.1983       05.03.2003       FA       20.09.2012       119       18.12.2012       02.01.2013       20.09.2012         20.       H.C. Khälf ur Rehman No. 141       16.04.1983       05.03.2003       FA       20.09.2012       119       18.12.2012       02.01.2013       20.09.2012         20.       H.C. Mulhammad Saleen No. 141       16.04.1983       05.03.2003       FA       20.09.2012       133       18.12.2012       02.01.2013       20.09.2012         21.       H.C. Mulhammad Salee No. 290       02.02.1975       25.09.1996       10°       30.11.2007       12       01.12.2007       02.01.2013       24.10.2012         22.       H.C. Klybammad Salee No. 336       04.01.1980       20.11.999       FA       25.07.2007       21.05.2012       12.11.2012         23.       H.C. Works No. 341       02.02.01975       20.10.1999       FA       26.09.2009 <t< td=""><td>- p - 1)</td><td></td><td>. 02.00.1-700</td><td>.01.03.2001</td><td>1</td><td></td><td>] .</td><td></td><td></td><td></td><td></td><td></td><td></td></t<>	- p - 1)		. 02.00.1-700	.01.03.2001	1		] .						
16.       PL2 MURANNEL V122 - V1			1.001057	0101:2002	T So	00.00.2012	 	1.18 12 2012	07.01.2013		20:09.2012		- 7
17. HG, Kepin Jakes No. 113       11.00.196       10.11.2007       12.01.2013       10.00.10.01.2013       10.00.10.01.2012       10.00.10.01.2013       10.00.10.01.2012       10.00.10.01.2012       10.00.10.01.2012       10.00.10.01.2012       10.00.10.01.2013       10.00.10.01.2012       10.00.10.01.2012       10.00.10.2012       10.00.10.2013       10.00.10.2012       10.00.10.2012       10.00.10.2012       10.00.10.2012       10.00.10.2013       10.00.10.2013       10.00.10.2013       10.00.10.2013       10.00.1.2012       10.00.1.2013       10.00.1.2012       1	16.	HC Muhainmad Ayuz No. 213 🧳	14.06.1983	01.01.2003		20.09.1012	· ·	10.12.2012	02.01.2010				+
17. HG, Kepin Jakes No. 113       11.00.196       10.11.2007       12.01.2013       10.00.10.01.2013       10.00.10.01.2012       10.00.10.01.2013       10.00.10.01.2012       10.00.10.01.2012       10.00.10.01.2012       10.00.10.01.2012       10.00.10.01.2013       10.00.10.01.2012       10.00.10.01.2012       10.00.10.2012       10.00.10.2013       10.00.10.2012       10.00.10.2012       10.00.10.2012       10.00.10.2012       10.00.10.2013       10.00.10.2013       10.00.10.2013       10.00.10.2013       10.00.1.2012       10.00.1.2013       10.00.1.2012       1				· · · · ·	· · · ·	1	ļ	18 12 2012	62.01.2013		20.09.2017		
13.       HC Muhaumad Salcom No. 187       02.01.1984       18.10.2004       MA       20.09.2012       48       18.12.2012       02.01.2013       20.09.2012         19.       HC Khalfl ur Rehman No. 141       16.04.1983       05.03.2003       FA       20.09.2012       119       18.12.2012       02.01.2013       -       20.09.2012         19.       HC Khalfl ur Rehman No. 141       16.04.1983       05.03.2003       FA       20.09.2012       119       18.12.2012       02.01.2013       -       20.09.2012         20.       HC Muhammud Salie No. 220       02.02.1975       25.09.1996       10 <sup>M</sup> 30.11.2007       12       01.12.2007       02.01.2013       -       20.09.2012         21.       HC Muhammud Salie No. 320       02.02.1975       25.09.1996       10 <sup>M</sup> 30.11.2007       12       01.12.2007       02.01.2013       -       24.10.2012         22.       HC Muhammud Salie No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2097       21.05.2012       12.11.2012         23.       HC Wagas No. 341       02.04.1975       20.10.1999       FSC       20.09.2012       32       01.01.2013       12.11.2012         24.10.2014       10.12.1978       20.10.1999	17.	HE Abdul Mateen No. 173 🔗 🗸	17.06.1988	14.07.2009	BA	20.09.2012	40	18.12.2012	02.01.2015		20109.2012	2	2) (
13.       HC Multaminad SaleCh (No. 137       0.1.01.1944       10.10.1044       10.10144 <t< td=""><td></td><td></td><td>V</td><td></td><td>   </td><td>· · ·</td><td>· ·</td><td></td><td></td><td></td><td></td><td><u>  · · · · · · · · · · · · · · · · · · ·</u></td><td>- 🕢 🍐</td></t<>			V		 	· · ·	· ·					<u>  · · · · · · · · · · · · · · · · · · ·</u>	- 🕢 🍐
19. PC KRIII dr Rethaniko, 191       1004, 193       2009,2012       133       18.12.2012       02.01.2013       20.09.2012         20. PC KRIII dr Rethaniko, 191       02.02,1975       25.09,1996       10 <sup>0</sup> 30.11.2007       12       01.12.2007       02.01.2013       18.10.2012         21. PC KRIII dr Rethaniko, 191       02.02,1975       25.09,1996       10 <sup>0</sup> 30.11.2007       12       01.12.2007       02.01.2013       18.10.2012         22. HC Muhammad Sajid No. 336       04.01.1980       20.11.2003       FA       20.03.2011       27       20.03.2011       02.01.2013       24.10.2012         23. HC Wegiz No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2007       21.05.2012       12.11.2012         24. TIC Bin Yameen No. 342       10.12.1978       20.10.1999       FSC       20.09.2009       98       20.09.2007       02.01.2013       13.12.2012         25       HC Quisar Zub No. 347       20.04.1980       24.02.2000       10 <sup>K</sup> 20.09.2012       132       01.10.7017       102.01.2013       13.12.2012         26       HC Quisar Zub No. 347       01.04.1983       01.04.2005       EA       20.09.2017       15       20.03.2007       16       20.03.2007       10.01.2013	18.	HC Muhammad Saleem No. 187	02.01.1984	18.10.2004	MA	20.09.2012	48	18.12.2012	02.01.2013	· -	20.09.2012		
19. PC KRIII dr Rethaniko, 191       1004, 193       2009,2012       133       18.12.2012       02.01.2013       20.09.2012         20. PC KRIII dr Rethaniko, 191       02.02,1975       25.09,1996       10 <sup>0</sup> 30.11.2007       12       01.12.2007       02.01.2013       18.10.2012         21. PC KRIII dr Rethaniko, 191       02.02,1975       25.09,1996       10 <sup>0</sup> 30.11.2007       12       01.12.2007       02.01.2013       18.10.2012         22. HC Muhammad Sajid No. 336       04.01.1980       20.11.2003       FA       20.03.2011       27       20.03.2011       02.01.2013       24.10.2012         23. HC Wegiz No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2007       21.05.2012       12.11.2012         24. TIC Bin Yameen No. 342       10.12.1978       20.10.1999       FSC       20.09.2009       98       20.09.2007       02.01.2013       13.12.2012         25       HC Quisar Zub No. 347       20.04.1980       24.02.2000       10 <sup>K</sup> 20.09.2012       132       01.10.7017       102.01.2013       13.12.2012         26       HC Quisar Zub No. 347       01.04.1983       01.04.2005       EA       20.09.2017       15       20.03.2007       16       20.03.2007       10.01.2013			1			•					<u></u>	· · · · · ·	-
21. HC Multianina Kai No. 290       02.02.1975       25.09.1996       10 <sup>th</sup> 30.11.2007       12       01.12.2007       02.01.2013       18.10.2012         22. HC Multianinal Sajid No. 336       04.01.1980       20.11.2003       FA       20.03.2011       27       20.03.2011       02.01.2013       24.10.2012         23. HC Wards No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2007       21.05.2012       12.11.2012         24. HC Bin Yameen No. 342       10.12.1978       20.10.1999       FA       25.07.2007       90       25.07.2019       21.05.2012       12.11.2012         25. HC Zäheer No. 347       20.04.1980       24.02.2000       10 <sup>th</sup> 20.09.2011       39       20.69.2019       02.01.2013       13.12.2012         25. HC Zäheer No. 347       20.04.1980       24.02.2000       10 <sup>th</sup> 20.09.2011       39       20.69.2011       02.01.2013       13.12.2012         26. HC Quisar Zinb No. 349       01.04.1983       01.04.2005       2A       20.09.2012       132       01 in 7017       102.01.2013       13.12.2012         32. HC Abdur Rashieed No.338       20.04.1975       20.10.1999       10 <sup>th</sup> 20.03.2007       15       20.03.2007       15.01.2033         28. H		HC Khalil ur Rehman No. 141	16.04.1983	05.03.2003	FA	20.09.2012	119	18.12.2012	02.01:2013	-	20,09.2012		
21. HC Multianina Kai No. 290       02.02.1975       25.09.1996       10 <sup>th</sup> 30.11.2007       12       01.12.2007       02.01.2013       18.10.2012         22. HC Multianinal Sajid No. 336       04.01.1980       20.11.2003       FA       20.03.2011       27       20.03.2011       02.01.2013       24.10.2012         23. HC Wards No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2007       21.05.2012       12.11.2012         24. HC Bin Yameen No. 342       10.12.1978       20.10.1999       FA       25.07.2007       90       25.07.2019       21.05.2012       12.11.2012         25. HC Zäheer No. 347       20.04.1980       24.02.2000       10 <sup>th</sup> 20.09.2011       39       20.69.2019       02.01.2013       13.12.2012         25. HC Zäheer No. 347       20.04.1980       24.02.2000       10 <sup>th</sup> 20.09.2011       39       20.69.2011       02.01.2013       13.12.2012         26. HC Quisar Zinb No. 349       01.04.1983       01.04.2005       2A       20.09.2012       132       01 in 7017       102.01.2013       13.12.2012         32. HC Abdur Rashieed No.338       20.04.1975       20.10.1999       10 <sup>th</sup> 20.03.2007       15       20.03.2007       15.01.2033         28. H			]	•									<u> </u>
21.       HC Myhammal Sajid No. 290       02.02.1975       25.09.1996       10 <sup>th</sup> 30.11.2007       12       01.12.2007       02.01.2013       18.10.2012         22.       HC Myhammad Sajid No. 336       V       04.01.1980       20.11.2003       PA       20.03.2011       27       20.03.2012       2       12.1.2012         23.       HC Wagáz No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2007       21.05.2012       12.11.2012         24.       HC Wagáz No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2017       21.05.2012       12.11.2012         24.       HC Bin Yameen No. 342       10.12.1978       20.10.1999       FSC       20.09.2009       98       20.09.2019       02.01.2013       12.11.2012         25.       HC Zihcer No. 347       20.04.1980       24.02.2000.       10 <sup>th</sup> 20.09.2012       132       01 10.7013       13.12.2012         26.       HC Qaisar Ziub No. 349       01.04.1983       01.04.2005       EA       20.09.2007       15       20.03.2007       06.06.2013       10.01.2013         28.       HC Muhammad Rafi No.354       02.02.1976       20.10.1999       10 <sup>th</sup> 20.09.2006       8	20	HC Muhammid Asif No. 285	-01.01.1985	15.10,2004	· FA ·	20.09.2012	133	18.12.2012	02.01.2013		20.09.2012		
21. Pre-Mightiminal Signet No. 320       0.0.22.07.5       20.01.100       10       10.01.2013       24.10.2012         22. HC Muhammad Signet No. 340       04.01.1980       20.11.2003       FA       20.03.2011       27       20.03.2011       02.01.2013       24.10.2012         23. HC Warkston, 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2007       21.05.2012       12.11.2012         24. FIC Bin Yameen No. 342       10.12.1978       20.10.1999       FSC       20.09.2009       98       20.09.2013       12.11.2012         25       HC Zaheer No. 347       20.04.1980       24.02.2000       16 <sup>th</sup> 20.09.2012       132       01.01.2013       13.12.2012         26. HC Qaisar Zub No. 349       01.04.1983       01.04.2005       EA       20.09.2012       132       01.01.2013       13.12.2012         27       HC Abdur Rastieed No.338       20.04.1975       20.10.1999       10 <sup>th</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         28       HC Muhammad Ani No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2009       06.06.2013       15.01.2013         29. HC Muhammad Ruño No.35       10.02.1976       20.10.1999										۰ <i>۰</i> ۰۰ أ		•	
22.       HC Muhammad Sajid No. 336       04.01.1980       20.11.2003       FA       20.03.2011       27       20.03.2011       02.01.2013       24.10.2012         23.       HC Waqia No. 341       02.06.1975       20.10.1999       FA       25.07.2007       21.05.2012       12.11.2012         24.       HC Bin Yameen No. 342       10.12.1978       20.10.1999       FSC       20.69.2009       98       20.09.2011       02.01.2013       12.11.2012         25.       HC Ziheer No. 347       20.04.1980       24.02.2000       16 <sup>8</sup> 20.09.2011       39       20.09.2011       02.01.2013       13.12.2012         26.       HC Qaisar Ziub No. 347       20.04.1983       01.04.2005       2A       20.09.2012       132       01.10.7017       02.01.2013       13.12.2012         27       HC Abdur Rashieed No.338       20.04.1975       20.10.1999       10 <sup>8</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         28.       HC Muhammad Rafi No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2007       05.02.2013       15.01.2013         29.       HC Muhammad Rafi No.352       20.02.1976       20.10.1999       10 <sup>6</sup> 20.09.2006       83       20.09.	21	HC Muhammad Saiid No. 290	02.02.1975	25.09.1996	10'5	30.11.2007	12	01.12.2007	02.01,2013	·	18.10.2012		
22.       HC Waqiz No. 341       02.06.1975       20.10.1999       FA       25.07.2007       90       25.07.2007       21.05.2012       12.11.2012         24.       HC Bin Yaneen No. 342       10.12.1978       20.10.1599       FSC       20.09.2009       93       20.09.2009       02.01.2013       12.11.2012         25.       HC Ziheer No. 347       20.04.1980       24.02.2000       10 <sup>4</sup> 20.09.2011       39       20.09.2011       02.01.2013       13.12.2012         26.       HC Qaisar Zuub No. 347       01.04.1983       01.04.2005       2A       20.09.2012       132       01.10.3012       02.01.2013       13.12.2012         26.       HC Qaisar Zuub No. 349       01.04.1983       01.04.2005       2A       20.09.2012       132       01.10.3012       02.01.2013       13.12.2012         27.       HC Abdur Rashised No.318       20.04.1975       20.10.1999       10 <sup>a</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         28.       HC Muhammad Rafi No.354       02.02.1976       20.10.1999       10 <sup>b</sup> 20.09.2006       83       20.09.2016       06.06.2013       15.01.2013         29.       HC Mir Afghun, No.32       20.02.1976       20.10.1999       10 <sup>b</sup> 20.09.20	· 1		<u> </u>		- FA	20.03.2011	27	20.03.2011	02.01.2013		24,10,2012	+	• .
22. NC waque No. 341       Clour DD       Clour DD       FSC       20.09/2009       98       20.09/2009       02.01/2013       12.11/2012         24. TiC Bin Yameen No. 342       10.12.1978       20.10/1999       FSC       20.09/2009       98       20.09/2013       12.11/2012         (25)       HC Zisheer No. 347       20.04/1980       24.02/2000       10 <sup>m</sup> 20/09/2011       39       20/09/2013       02.01/2013       13.12/2012         26. HC Qaisar Ziub No. 349       61.04/1983       01.01/2005       EA       20.09/2012       132       01.10/2012       02/01/2013       15.12/2012         27. HC Abdur Rashired No.338       20.04/1975       20.10/1999       10 <sup>m</sup> 20.03/2007       15       20.03/2007       06.06/2013       10.01/2013         28. HC Muhampiad Rafi No.354       02.02/1976       20.10/1999       10 <sup>m</sup> 20.09/2006       83       20.09/2016       06.06/2013       15.01/2013         29. HC Mir Afghun No.52       20.02/1975       27.06/1996       10 <sup>m</sup> 20.09/2006       190       20.09/2016       06.06/2013       05.02/2013         30       HC Mir Afghun No.355       10.04/18Q       20.10/1999       FA       20.09/2006       190       20.09/2016       06.06/2013       05.02/2013      <	44.	HC MURAMMAU SUITU NO. 550		10.11.2003	ł				· · ·			· · ·	
22. NC waque No. 341       Clour DD       Clour DD       FSC       20.09/2009       98       20.09/2009       02.01/2013       12.11/2012         24. TiC Bin Yameen No. 342       10.12.1978       20.10/1999       FSC       20.09/2009       98       20.09/2013       12.11/2012         (25)       HC Zisheer No. 347       20.04/1980       24.02/2000       10 <sup>m</sup> 20/09/2011       39       20/09/2013       02.01/2013       13.12/2012         26. HC Qaisar Ziub No. 349       61.04/1983       01.01/2005       EA       20.09/2012       132       01.10/2012       02/01/2013       15.12/2012         27. HC Abdur Rashired No.338       20.04/1975       20.10/1999       10 <sup>m</sup> 20.03/2007       15       20.03/2007       06.06/2013       10.01/2013         28. HC Muhampiad Rafi No.354       02.02/1976       20.10/1999       10 <sup>m</sup> 20.09/2006       83       20.09/2016       06.06/2013       15.01/2013         29. HC Mir Afghun No.52       20.02/1975       27.06/1996       10 <sup>m</sup> 20.09/2006       190       20.09/2016       06.06/2013       05.02/2013         30       HC Mir Afghun No.355       10.04/18Q       20.10/1999       FA       20.09/2006       190       20.09/2016       06.06/2013       05.02/2013      <			07.06.1075	20.10.1009	IFA	75 07 2007	.00.	75 07 2007	. 21 05 2012 3		17.11.2012		
24.       HC Bit Falleeti No. 342       HOLLER R       Longer R       10       1	4			1	. ·	·		· · ·			· · · · · ·		:
25. HC Qaisar Zub No. 349       01.04.1983       01.04.2005       2A       20.09.2012       132       01.10.2013       15.12.2012         22.       HC Abdur Rashined No.338       20.04.1975       20.10.1999       10 <sup>th</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         23.       HC Muhammad Rafi No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2009       06.06.2013       15.01.2013         29.       HC Main Alghan No.52       20.02.1976       20.10.1999       10 <sup>th</sup> 20.09.2006       83       20.09.2009       06.06.2013       05.02.2013         30.       HC Amir Alghan No.53       24.02.1975       27.06.1996       10 <sup>th</sup> 20.09.2006       83       20.09.2006       06.06.2013       05.02.2013         31.       11C Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       05.02.2013         31.       11C Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       07.02.2013         32.       11C Ahmad Sneed No. 336       13.04.1980       01.07.2000       FA       20.09.2010       132	.24.	TIC Bin Yameen No. 342	0.12.1978	20,10,1999	rsc	. 20.09.2009	93	20.09009	12.01,2013.		12.11.2012		. <b>-</b>
25. HC Qaisar Zub No. 349       01.04.1983       01.04.2005       2A       20.09.2012       132       01.10.2013       15.12.2012         22.       HC Abdur Rashined No.338       20.04.1975       20.10.1999       10 <sup>th</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         23.       HC Muhammad Rafi No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2009       06.06.2013       15.01.2013         29.       HC Main Alghan No.52       20.02.1976       20.10.1999       10 <sup>th</sup> 20.09.2006       83       20.09.2009       06.06.2013       05.02.2013         30.       HC Amir Alghan No.53       24.02.1975       27.06.1996       10 <sup>th</sup> 20.09.2006       83       20.09.2006       06.06.2013       05.02.2013         31.       11C Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       05.02.2013         31.       11C Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       07.02.2013         32.       11C Ahmad Sneed No. 336       13.04.1980       01.07.2000       FA       20.09.2010       132		· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·						07.01.7017	ļ		· · · · · · · · · · · · · · · · · · ·	• • •
26.       HC Qaisar Zuub No. 349       01.04.1983       01.04.2005       PA       20.09.2012       132       01.10.7012       02.01.2013       -       15.12.2012         27.       HC Abdur Rashined No.338       20.04.1975       20.10.1999       10 <sup>th</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         28.       HC Muhammad Rafi No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2009       06.06.2013       -       15.01.2013         29.       HC Mir Afghun No.352       20.02.1976       20.10.1999       10 <sup>th</sup> 20.09.2006       83       20.09.2006       05.02.2013         30.       HC Amjid Khau No.93       24.02.1975       27.06.1996       10 <sup>th</sup> 20.09.2006       190       20.09.2006       06.06.2013       -       05.02.2013         31.       HC Wazir Muhammad No.355       10.04.18Q       20.10.1999       FA       20.09.2006       190       20.09.2006       06.06.2013       -       05.02.2013         32.       HC Amjid Khau No.355       10.04.18Q       20.10.1999       FA       20.09.2006       190       20.09.2006       06.06.2013       -       05.02.2013         32.       HC Amjid Khau No.356       13.04.1980 </td <td>(`25.</td> <td>HC Zühter No. 317</td> <td>20.04,1-980 ;</td> <td>24.02.2000</td> <td>1 10</td> <td>20:09.2011</td> <td>} .</td> <td></td> <td>02.01.2013</td> <td></td> <td>13.12.2012 .</td> <td></td> <td><b>ن</b> ۰</td>	(`25.	HC Zühter No. 317	20.04,1-980 ;	24.02.2000	1 10	20:09.2011	} .		02.01.2013		13.12.2012 .		<b>ن</b> ۰
20. He Galar Zabriel No. 347       01.04.1900       01.04.1900       10 <sup>th</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         272       HC Abdur Rashieed No.338       20.04.1975       20.10.1999       10 <sup>th</sup> 20.03.2007       15       20.03.2007       06.06.2013       10.01.2013         28.       HC Muhammad Rafi No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2009       06.06.2013       15.01.2013         29.       HC Mir Afghun No.52       20.02.1976       20.10.1999       10 <sup>th</sup> 20.09.2006       83       20.09.2009       06.06.2013       05.02.2013         30.       HC Amjid Khan No.93       24.02.1975       27.06.1996       10 <sup>th</sup> 20.09.2006       190       20.09.2006       06.06.2013       05.02.2013         31       HC Wazie Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       07.02.2013         32.       HC Ahmad Sneed No. 356       13.04.1980       01.07.2000       FA       20.09.2010       132       14.11.3.10       22.03.2012       12.02.2013			]		<u> </u>			· · · · · · · · · · · · · · · · · · ·		}		·	
CD_ HC Addr Rasieed (0.355       20.04.1735       20.04.1735       20.04.1735       20.09.2009       161       20.09.2009       06.06.2013       -       15.01.2013         28. HC Muhammad Rafi No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2009       06.06.2013       -       05.02.2013         29. HC Mir Afghur, No.52       20.02.1976       20.10.1999       10 <sup>16</sup> 20.09.2006       83       20.09.2006       06.06.2013       -       05.02.2013         30. HC Amjid Khan No.93       24.02.1975       27.06.1996       10 <sup>16</sup> 20.09.2006       190       20.09.2006       06.06.2013       -       05.02.2013         31. HC Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       -       07.02.2013         32. HC Ahmad Sneed No. 356       13.04.1980       04.07.2000       FA       20.09.2010       132       14.11.2.310       22.03.2012       -       12.02.2013	26.	HC Qaisar Zub No. 349	01.04,1983	01.04.2005	EV.	20.09.2012	132	01 10 2012	02.01.2013	-	13.12.2012		•
CD_ HC Addr Rasieed (0.355       20.04.1735       20.04.1735       20.04.1735       20.09.2009       161       20.09.2009       06.06.2013       -       15.01.2013         28. HC Muhammad Rafi No.354       02.02.1981       24.01.2002       FA       20.09.2009       161       20.09.2009       06.06.2013       -       05.02.2013         29. HC Mir Afghur, No.52       20.02.1976       20.10.1999       10 <sup>16</sup> 20.09.2006       83       20.09.2006       06.06.2013       -       05.02.2013         30. HC Amjid Khan No.93       24.02.1975       27.06.1996       10 <sup>16</sup> 20.09.2006       190       20.09.2006       06.06.2013       -       05.02.2013         31. HC Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       -       07.02.2013         32. HC Ahmad Sneed No. 356       13.04.1980       04.07.2000       FA       20.09.2010       132       14.11.2.310       22.03.2012       -       12.02.2013				· · · · ·								<u> </u>	:
23. He Walahilad Kari No.52       20.02.1976       20.10.1999       10 <sup>16</sup> 20.09.2006       83       20.09.2006       (16,06.2013)       -       05.02.2013         (30. HC Amjid Khan No.93       24.02.1975       27.06.1996       10 <sup>16</sup> 20.09.2006       190       20.09.2006       06.06.2013       -       05.02.2013         31. HC Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       -       07.02.2013         32. HC Ahmad Saced No. 356       13.04.1980       01.07.2000       FA       20.09.2010       132       14.11.2.10       22.03.2012       -       12.02.2013	27	HC Abdur Rashired No.338	20.04.1975	20.10.1999	10 <sup>th</sup> .	20.03.2007	15	20.03.2007	1		10.01.2013	<u> .</u>	
29. HC Mir Afghun No.52       20.02.1976       20.10.1999       10 <sup>16</sup> 20.09.2006       83       20.09.2006       06.06.2013       -       05.02.2013         30. HC Amjid Khan No.93       24.02.1975       27.06.1996       10 <sup>16</sup> 20.09.2006       190       20.09.2006       06.06.2013       -       05.02.2013         31. HC Wazir Muhammad No.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       -       07.02.2013         32. HC Ahmad Sneed No. 356       13.04.1980       01.07.2000       FA       20.09.2010       132       14.11.2.310       22.03.2012       -       12.02.2013	28.	HC Muhammad Rafi No.354	02.02.1981	24.01.2002	FA	20.09.2009	161	20.09.2009	06,06,2013 *		15.01.2013		
25.       HC Har Agriat N0.32       24.02.1975       27.06.1996       10 <sup>th</sup> 20.09.2006       190       20.09.2006       06.06.2013       05.02.2013         31.       HC Wazir Muhammad N0.355       10.04.180       20.10.1999       FA       20.09.2006       100       20.09.2006       06.06.2013       07.02.2013         32.       HC Ahmad Sneed No. 356       13.04.1980       01.07.2000       FA       20.09.2010       132       14.11.2.310       22.03.2012       -       12.02.2013							ļ				-		
(30.         HC Amjid Khan No.93         24.02.1975         27.06.1996         10 <sup>th</sup> 20.09.2006         190         20.09.2006         06.06.2013         -         05.02.2013           31.         HC Wazir Muhammad No.355         10.04.180         20.10.1999         FA         20.09.2006         100         20.09.2006         06.06.2013         -         07.02.2013           32.         HC Ahmad Sneed No. 356         13.04.1980         01.07.2000         FA         20.09.2010         132         14.11.2.30         22.03.2012         -         12.02.2013		HC Mir Afghur, No.52	20.02.1976	20,10,1999	1015	20.09.2006	83	20,09,2006	06,06,2013		05.02.2013		
31         11C Wazir Muhammad No.355         10.04.180         20.10.1999         FA         20.09.2006         100         20.09.2006         06.06.2013         -         07.02.2013           32.         11C Ahmad Sneed No. 356         13.04.1980         01.07.2000         FA         20.09.2010         132         14.11.2.310         22.03.2012         -         12.02.2013		· · ·		27.06.1996	10 <sup>th</sup>	20.09.2006	190	20.09.2006	06.06.2013	<u> </u> †	05.02.2013	1	
32. 11C Ahmad Sneed No. 356 13.04.1980 01.07.2000 FA 20.09.2010 132 14.11.2310 22.03.2012 - 12.02.2013		-			1	h		1 20.09.2006	06.06.2013		07.02.2013	<u> </u>	•
			1	-l	<u> </u>			<u> </u>	l		·	<u> </u>	
		1 HC Ahmad Sneed No. 356	13.04.1980	01.07.2000					1				
13.02.2013 Transfer from Sinc		<u>`</u>			<u> </u>				04.04.0012	<u> </u>	13 03 2017	1 Transfer Gross Sine	
Police seniority	15 00 11.	TIC Muhammad Rizwan No.358	12.08.1972	07.11.1995	BY	1	• 97	18.05.2905	06,06,2013	•	13.02/2013	Police seniority	
accepted at bettor.		. · ·	· · ·	1								accepted at botton	
Arrival Date 23.11.2009	1310		.		· ·				•			23.11.2009	
		<u> </u>	<u> </u>	<u>1 </u>		I		<u>t</u>	Li	L,,,,		•	

PER

											~	· .
-				-								
•												l e
	· ·		· ·								and a state	(0,0)
•			بر •	1431			· · · · · · · · · · · · · · · · · · ·	ر بهمایند از این میشونیس مسیق				
									·····	,	· · · · · · · · · · · · · · · · · · ·	
		21.03.1978	03.04.1996	·: 1.0 <sup>15</sup>	11,10.2008	60/C .	1.17.12.2008	20.09.2009	<u>.</u>	14.02.2013	Transfer from	
34	HC Abid Khan No. 317	21.00.000					1.				seniority accepted .	~~~
					·	1			i l		at bottom arrival	·
					ł		, ·				Date 02.07:2011	۰. ۱
	· · · · · · · · · · · · · · · · · · ·		2010100	FA	25.07.2007	84	25.07.2007	06.06.2013		28.02.2013		
35	HC Zanfar Khan No,359	03.04.1978	. 20.10.1999.			· · · · · · · · · · · · · · · · · · ·	1			14,03.2013	;	4 5
	HC Chulam Mohi-ud-Din No.362	13.02.1980	20.06.2000	BA	20.03.2011	25 ·	01.04.2011-	00.00.2013				
		·				ł				<u> </u>		
		01.01.1984 ·	01.02.2002	:10"	20.03.2013	31	20.03.2013	06:06.2013	•	20.03.2013		
37	HC Muhammad Mustaqim No.289	01.01.1704		· · ·				} .•				· . 🛁
.[	•			<u>.</u>	· · ·	ļ			<u> </u>	20.03.2013		•
38	11C Mühammed Iqbal No.249	01.03.1985	05.11.2003	FA	20.03.2013	84	20,03.2013	06.06.2013	-	20.03.2015		•
			•			•		ļ .			· · · · · · · · · · · · · · · · · · ·	•
	·····	01.03.1980	-05.11.2003	10%	20.03.2013	110	20:03.2013	06.06:2013		20.03.2013		
39	HC Anwar No:252	01:03:1930 **				) · · · ·						
. · ·				l					· · · · · · · · · · · · · · · · · · ·	20.03.2013	<u> </u>	
40	HC Talch Muhammad No.123	01.05.1980	15.10.2004	FA .	20.03.2013	144	20.03.2013	06:06.2013,		20.05.2015	· · ·	
1			· .							· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
		20.12.4070	10.04.2001	1010	20.03.2013	215	20.03.2013	06.06.2013		20.03.2013	· · ·	
41	HC Gul Afzal No.340	20.12.1979	10.04.2004						[·. · · ·			
}				· · ·	<u> </u>			1		20:03.2013	<u></u>	• • - • •
42	L. HC Sohoil Nadeem No.211	20.04.1986	15.10.2004	BA	20.03.2013	301	20.03.2013	06.06 2013	{ •	20.03.2010		
	· ·	· ·			1.	.	} '		1	•	<u> </u>	
		16.03.1986	18,03.2008	MA	20.03.2011	88	04.07.2011	01:09.2013	· •	06.07.2013		
4	3. HC Fida Muhmmad Khan No.396	10.02.1240		ł	••••	ļ	}	ļ <sup>,</sup> .	1		· .	
			L	[ · 	Ļ	·		30.12.2010	ļ	29.08.2013		
4	HC Aus No. 171	06.10.1972	04.10.1993	100	20.09.2006	209	20.09.2006	ſ	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	
	5. HC Gh.lam Shabir No. 415	02.07.1975	15.10.1996	10 <sup>16</sup>	20.09.2006	· 151	20.09.2006	20.05.2013	· · · .	24:09:2013		
	5. 13C Unclam Shaoir 190, 415			1	- <b></b>	<u> </u>	<u></u> ,	L				•

Distric

Officer,

PHONE NO. 091-9210545 TAX NO. 091-9210927 FROM: The Provincial Police Officer, N.W.F.P., PESHAWAR. Inner N  $\mathbb{T}G_{3}$ The DIG of Police, Hazara Region, ANROVITABAD. No. 9430 /I-I; Dated Peshawar, the 08//. /2009 STBJECT:-APPLICATION. MEMO\_ Please refer to your Memo.No.3963/E dated 2-4-2009. The seniority list is required to be maintained strictly in accordance with the order of worit of P-T-C. Hangu result and selection to all sort of courses are made on seniority of lists-C-D & E and not promotion. Lζ, Ý m(( MUHAMMAD GULAMAN F DTG/DDrs. DTG/DDrs. GL levPP., Peuba. 5.2 . . .  $\{ [ e_{ij} \}_{i \in I} \}$ (k)Commissé

# BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

C.M No.\_\_\_\_/2014. In Ref: Appeal No.\_\_\_\_/2014

Zanfer Head constable, KPK Police Department posted in District Torghar.

Applicant/Appellant

Versus

Provincial Police Officer, KPK, Peshawar and others. Respondents

> APPLICATION TO THE EFFECT THAT THE RESPONDENT NO.1 TO 4 MAY NOT ACT UPON THE IMPUGNED ILLEGAL SENIORITY LIST OF HEAD CONSTABLES OF DISTRICT TORGHAR WHICH IS PREPARED BY D.P.O, TORGHAR AFTER THE LIST C-I OF HEAD CONSTABLES DISTRICT TORGHAR AS STOOD ON OR BEFORE 30.09.2013 TILL THE FINAL DISPOSAL OF MAIN APPEAL.

It is respectfully submitted as under:-

- 1. That the above title appeal is filed today and is not fixed for its hearing as yet.
- 2. That the contents of main appeal be treated as integral part of this application and same are not repeated herein for the sake of brevity.
- 3. That the applicant/ appellant have made out a good prima-facie case in his favour and there is every likelihood of its success.

4. That balance of convenience leans in the favour of applicant/appellant as he has joined the Police Department much prior to the private respondents and have also passed lower training school course prior to them and due to that reason he was enlisted in list C-I as senior to them as stood on or before 30.09.2013. In case the official respondents are not restrained from acting upon the impugned illegal seniority list of Head Constables prepared by DPO Torghar after 30/09/2013 then applicant/ appellant shall suffer irreparable loss.

therefore, humbly prayed Ιt is that this Honourable Tribunal by way of ad-interim order restrain the respondents No.1 to 4 from acting upon impugned illegal seniority list of the Head Constables of District Torghar till the final and accordingly disposal of main appeal be restrained from sending the private respondents for intermediate course to Hangu training College prior to the appellant.

Applicant/ Appellant

(Abdul Shakoor Khan) Advocate Supreme Court of Pakistan.

Dated:- /03/2014.

Through:-

# BEFORE THE KPK SERVICE TRIBUNAL

### PESHAWAR

C.M No.\_\_\_\_/2014. In Ref: Appeal No. /2014

Zanfer Head constable, KPK Police Department posted in District Torghar.

Applicant/Appellant

Versus

Provincial Police Officer, KPK, Peshawar and others.

Respondents

### AFFIDAVIT

I Zanfer Head constable, KPK Police Department posted in District Torghar do hereby declare on oath that the contents of the application are true and correct and nothing has been concealed from this Honourable Tribunal.

Deponent



#### P-37

### BEFORE THE KPK SERVICE TRIBUNAL

#### PESHAWAR

C.M No.\_\_\_\_/2014. In Ref: Appeal No.\_\_\_\_/2014

Zanfer Head constable, KPK Police Department posted in District Torghar.

Applicant/Appellant

Versus

3

Provincial Police Officer, KPK, Peshawar and others. Respondents

> APPLICATION FOR GRANT OF EXEMPTION OF FILING THE COPIES OF APPEALS FOR PRIVATE RESPONDENTS TILL THE ADMISSION OF AFORESAID APPEAL FOR REGULAR HEARING.

It is respectfully submitted as under.

- That the titled appeal is filed today and is not fixed for its hearing.
- 2. That the appellant due to financial constraint at the moment is unable to file 45 copies of appeal alongwith annexures for private respondents.

It is therefore, humbly requested that this Honourable Tribunal may graciously be pleased to exempt the appellant for filing the copies of appeal for private respondents till the admission of aforesaid appeal for regular hearing.

Alufa

a

Applicant/ Appellant

(Abdul Shakoor Khan)

Through:-

Dated:- \_\_\_/03/2014.

•

Advocate Supreme Court of Pakistan.

. .

فتمتى وكالت نامهر كورث فيس Before The KPK Sesone Talamel Pothewicz will Zonfor V/C REdaily عنوان: Deppellent منجانب: Sirve Dypperl نوعيت مقدم باعث تحريراً نكبه مقدمہ مندرجہ میں اپنی طرف سے داسطے ہیروی وجواب دہی کل کاروائی متعلقہ آں مقام Adul Shallers Kron ASc Rechencer کووکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کا روائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کوکرنے راضی نامہ دتقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک رو پیہ دعرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا ادر بصورت ضرورت مقدمہ مذکور کی کل پاکسی جزوی کاردائی کے لئے کسی اور وکیل یا مختارصاحب قانونی کواپنے ہمراہ اپنی بجائے تقرر کا اختیار بهمى ہوگاادرصاحب مقرر شدہ کوبھى وہى اور ديسے ہى اختيارات ہوں گے اوراس کا ساختہ پر داختہ مجھ کومنظور وقبول ہوگا۔ دوران مقدمہ جوخرچ و ہرجانہ التوائے مقدمہ کے سب ہو گا اس کے مشخق وکیل صاحب ہوں گے ۔ نیز بقایار قم دصول کرنے کابھی اختیار ہوگا۔اگر کوئی پیشی مقام دورہ پر ہویا حد سے باہر ہوتو وکیل صاحب موصوف پایند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نائش بسیغہ مفلس کے دائر کرنے اور اس کی بيردى كابهى صاحب موصوف كواختيار ہوگا۔ لہذاوکالت نامہتح ریکردیا تا کہ سندر ہے۔ بمقام: Accepted by Abarl Shalcar When ASL DOOL وقاص فوٹوسٹیٹ کیجری (ایبٹ آیاد)

Befre the Honesle Chairman KPE Searce Todown Potrensos US Roosmant churf of Police K.P.K. Pothemes Zenfor Application for early heary of titled Core at Petronson It is safeed fully monthed aslends: That the talked line after semoving the abyetten sourced by the affile of Handle Torburt is se wouth a today te the pre linny heary day with The mother of append is of meh nettre which seguize the some he based earlier then its turn.  $\langle L \rangle$ The raid uneary compelled the The raid uneary compelled the applicant ter filmy other application. Applicant ter philichun is out heart In Gre te row applichun is out heart In Gre zohn Morch at Rechenseo hear the bela zohn Morch at Rechenseo hear the Margh purpose of Home tis atthetiction booknadiced Home this atthetiction possindriced. Home this affeliation It is, monforr, very hubby prouved to At is, monforr, very hubby previde to the worthy thais may be pleaned to the worthy Onais may be grow only the disit the Caller the act of the ments that the Caller the make at the house Einest before 35th Month at Letremer Applicat | Appletent Abold Shelensloth 2W. 3.2.14 entri Nes the

solid Service Trebunal KPK tialle

(inter) HC 359 ine

Mu.

When kilk in Provincial

Early Hearing showig;

منا ب عالى در است زيل عرف م

م ک معتمان زیر فریز آلخان مجری

· 2012-06-14 Juno 12000, . & Wegant Matter in 4 Jubosé 2, 2 Jun SN

معذاا شريك هيله در فور سر usi l'égéloppi forty Hearing

- 6. 36 in Cilie

1'il

ois

از د

22-4-14 we oak 22 which is Mar HC 359 isis

isting Service , reparried 41the lister (inter) HC 359 jaines TU. gies kijk vielond / Poorinceal tang teaning subduring jo - 2. congristing in de chi - Lawie with Leviller want , find 13-06-14 Con 191-30-61 can 1-14. i Urgant Matter in 440 Nanit i és coodult - 4. ·~~~ in 11 my Darb ciel mul use i vere crippin farly Hearing is skide je vice Since 19-4-14 Since 19-6-56 Nov He 359 Junie

وكالت نامه ا كور فيس Jul Servia Thibung KIK Ling ( July) Pip ريبيل باعث تحريراً نکه صب<del>ت</del> مقدمه مندرجه میں اپن طرف سے داسطے پیروی و جواب دبی کل کاردائی متعلقه آن مقام Junion By Surger 14/00 miles کوڈ کیل مقرر کرکے اقر ارکرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز دکیل صاحب موصوف کوکرنے راضی نامہ دتقرر ثالث و فیصلہ برحلف ودینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک رو پیہ وعرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل پاکسی جزوی کاروائی کے لئے کسی اور وکیل یا مختارصاحب قانونی کواپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کوبھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جوخرچہ دوہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایار قم وصول کرنے کا بھی اختیار ہوگا۔اگر کوئی پیشی مقام دورہ پر ہو یا حد ہے باہر ہوتو وکیل صاحب موصوف ؛ پابند ہوں گے کہ پیردی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمرا داستجارت نائش بصیغہ مفلس کے دائر کرنے اور اس کی بيروى كاتبحى صاحب موصوف كواختيار هوكا\_ لہذاد کالت نامة تحرير كردياتا كەسندر ب-<del>29.4</del>.14 بمقام: Accepted by Me.

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

Service Appeal No. 407/2014

Zanfeer VS

Police Deptt:

# <u>REPLY ON BEHALF OF RESPONDENTS</u> <u>NO.5,6,7,8,9,10,11,12</u>

### **RESPECTFULLY SHEWETH:**

### Preliminary Objections:

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

### FACTS:

- 1. Pertain to record, hence no comments.
- 2. Pertain to record, however civil servant are legally bound to perform their duties where they are posted. More over the police staff seniority is based on Distt: Police strength and as such the officials in Distt; to Ghar prior to the appellant stood senior to the appellant under the Rules 8 of APT Rules. Therefore mere having passed exam after to appellant makes no grounds for claiming seniority.

- 3. Incorrect and misconceived. The seniority of Distt; Police within Distt: is based on the date when who joined the Distt; police and not on the basis of P.R 13.8 of 1934.
- 4. Incorrect and misconceived, hence denied.
- 5. Matter of record, hence no comments.
- 6. Pertain to High Court Recorded. However High Court clearly directed in its judgment that the grievances of the said respondents may consider in accordance with law with in 30 days.
- 7. Incorrect. the respondents No. 5 to 7 are senior to Ayaz Khan but Ayaz Khan was sent for intermediate course and completed the course inspite of clear direction of High Court to consider the grievance of respondents No. 5 to 7 thus depriving due rights of the respondents No. 5 to 7.
- 8. Incorrect. The private respondents No. 5 to 7 are senior to Ayaz Khan but the police Deptt: did not consider them according to clear direction of High Court and sent Ayaz Khan for intermediate course.
- 9. Pertain to record, however respondents No. 5 to 7 are senior and their name should be mention above to Ayaz Khan and other junior Head Constables in seniority list.

10. Incorrect. private respondents No. 5 to 9 raised their grievances before the Police Darbar at Police Line District Torghar which was assured by DPO Torgher to accommodate them as per their request, moreover the letter dated is not according to law as High Court clearly directed the official respondents to consider the grievances but the official respondents did not consider respondents No. 5 to 9 grievances and sent Ayaz khan and other for intermediate course.

. .

f<sup>‡</sup>,

- 11. Incorrect. The letter from the office of Additional I.G.P dated 9.10.2013 is not maneuvered but according to law and rules.
- 12. Incorrect. the letter dated 9.10.2013 is according to law and rules and has not effected the appellant along three other head constables, moreover the seniority list of head constables made by DPO Torgha is according to law and rules.
- 13. The appeal of appellant is not maintainable and time barred.
- 14. The appeal filed by the appellant is not according to law and rules, hence not maintainable.

### **GROUNDS:**

4

- A. Incorrect. The seniority list prepared by the DPO Torghar is according to law and rule.
- B. Incorrect, hence denied.
- C. Incorrect. private respondents No. 5 to 9 raised their grievances before the Police Darbar at Police Line District Torghar which was assured by DPO Torgher to accommodate them as per their request. moreover the letter dated is not according to law as High Court clearly directed the official respondents to consider the grievances but the official respondents did not consider respondents No. 5 to 9 grievances and sent Ayaz khan and other for intermediate course. Moreover The letter from the office of Additional I.G.P dated 9.10.2013 is not maneuvered but according to law and rules and on the basis of this letter the DPO Torghar prepared seniority list and that seniority list is according to law and rules.
- D. Incorrect. Hence denied.
- E. Incorrect. The private respondents are senior to Ayaz khan but Ayaz khan was selected for

intermediate course on which the respondents No. 5 to 7 filed Constitutional Petition before the Honourable Peshawar High Court. Moreover the DPO Torghar acted according to law and rules.

- F. Incorrect. the DPO Torghar has lawful authority to prepare the seniority list and the seniority list prepared by him is according to law and rule keeping in view Rule -8 of APT Rules 1989..
- G. Incorrect. Every civil servant is bound to do duty in any location weather he is transfer by his superior or by his own request. The seniority list prepared  $b\bar{y}$ competent authority is according to law and rules and the DPO Torghar has not made any distinction between the appellant and respondents for the purpose of doing intermediate course and has placed everv one includina appellant and respondents according to his right.
- H. Incorrect. Hence denied.
- I. Incorrect. the DPO Torghar acted according to law and rule and did not deprive the appellant and three other Head Constables from their due right.
- J. Incorrect. The seniority list prepared by the DPO Torghar on the basis of executive order is according to law and rule and the appellant have not been deprived from his by placing the appellant on his right position.
- K. Incorrect. Hence denied.
- L. Incorrect. Hence denied.
- M. Incorrect. The appellant has not right to sent to Hangu Police Training College for doing intermediate course according to his position in seniority list.

- N. Incorrect. The DPO Torghar has not scraped the right of the appellant, but he acted upon the rules and law.
- O. The appeal is not within time.

It is, therefore, most humbly prayed that the appeal in hand may be dismissed with cost through out/merit less and devoid of any legal footing.

Replying respondents 5,6,7,8,9,10,11,12

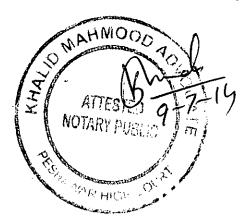
Through:

(M. ASIF YOUSAFZAI) ADVOCATE, PESHAWAR.

& (TAIMUR ALI KHAN) ADVOCATE PESHAWAR.

### <u>AFFIDAVIT</u>

It is affirmed and declared that the contents of reply are true and correct to the best of my knowledge and belief.



DEPONENT

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service April NO 405 to 408/2014 

VERSUS

Police Department etc......Respondents

# SERVICE APPEAL

# WRITTEN REPLY ON BEHALF OF RESPONDENTS NO.1 TO 4.

### Index

S#	Particulars of documents	Annexure	Pages
1	Memo of written reply.		
2	Copy of letter No.25349 dated 09.10.2013.	"A"	
3.	Copy of the seniority list.	"B"	
4	Copy of the letter of DPO.	"C"	

Dated 02.09.2014

Provincial Police Officer etc. .....Respondents No.1 to 4

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Sac. W

(A)

Muhammad Amjad .....Appellant

## VERSUS

Police Department etc......Respondents

## SERVICE APPEAL

## WRITTEN REPLY ON BEHALF OF RESPONDENTS NO.1 TO 4.

Respectfully Sheweth!

# PRELIMINARY OBJECTIONS.

- 1. The appellant has got no cause of action.
- 2. The appellant has no locus standi to institute baseless appeal.
- 3. That appeal is not maintainable in its present form.
- 4. The appellant has not come to the tribunal with clean hands.
- 5. Appeal is time barred.
- 6. That this Honourable tribunal has got
  - no jurisdiction to entertain the appeal.

- 7. The appellant is estopped by his own conduct to file the present appeal.
- 8. The appeal is bad due to mis-joinder and non-joinder of necessary parties.

. Ī,

ī

3-.

### FACTUAL OBJECTIONS:

1.

2.

3.

Para No.1 needs no comments.

Para No.2 is correct upto the extent of newly created District Torghar. As far as the rest of the para is concerned, head of the department has power to transfer the officials and officers as per the requirements for running the administrative functions.

It is further added that District Torghar newly created District in which no fundamental facilities were available and nobody was willing to perform his duty due to which high ups given incentive to the officials for the smooth functioning.

Para No.3 is incorrect. The seniority list was prepared on first come first basis by the respondent No.4 on the direction of respondent No.2 vide his letter No.25349 dated 09.10.2013. *(Copy attached as annexure "A")*.

Para No.4-is totally incorrect.

Para No.5 needs proof. The Head of the District has power to select the officials for training course on the basis of the whole record and efficiency and on arrival basis.

5.

6.

<u>. HA</u>

1

11

iT

12

12

12

ĩΣ

12

12

12

Ţ,

# (Copy of the seniority list is attached as annexure "B").

It is correct, the presentation of respondents was considered by the committee and held that the selection for inter college course was made on merit and in accordance with rules. But the decision was challenged by the respondents before the higher forum while decided in the favour of respondents No.5 and 7. (Copy of the order is attached as annexure "A").

Para No.7 is incorrect. Respondent No.4 has submitted the detail report to the respondent No.2 regarding the grievances of Head Constables and other, whole situation of the newly created District Torghar on which respondent No.2 passed an order on 09.10.2013.

(Copy of the letter of DPO is attached as annexure "C").

Para No.8 is incorrect. The detail has been given in the above para. Η

11 11

īī

12

In reply to para No.9, it is submitted department Constituted that police direction of on the Committee Honourable High Court in the year . 2012, while the submissions of the respondent No.4 regarding grievances of Head Constables were submitted in the year 2013 on the basis of which high up of Police Department that is respondent No.2 passed appropriate order in the light of the detail report of the respondent No.4 considering the circumstances and whole situation of newly created District Torghar.

Para No.10 is incorrect, the detail has been given in the above paras. The respondents have already submitted their grievances before high ups and after getting comments from respondent No.4 the order was passed by respondent No.2 which is intact.

11. In reply to para No.11, it is submitted that after the decision of departmental committee, the high ups decided in the year 2013 considering the whole

. 8.

9.

10.

situations of the new created District Torghar. <u>HA</u>

25 11

. <del>II</del>

1

12

12

i:

.....

īΣ

12

i7

12

 $\widetilde{12}$ 

1.2

ā

12. Para No.12 is incorrect, the case of the respondents No.5 to 7 is different which was reconsidered by the respondent No.2 on the basis of the detailed report of the respondent No.4.

13. Para No.13 is incorrect. Respondents No.1 to 4 rightly and bonafidely decided the matter considering the circumstances of new created District in their capacity for the betterment of enhance working capability.

14. Para No.14 needs proof.

# GROUNDS

a.

b:

**C.** 1

Para No.(a) is incorrect, respondent No.4 prepared seniority list after fulfilling all codal formalities.

Para No.(b) is incorrect.

In reply to para No.(c) it is submitted that the request of respondents No.5 to 9 was considered by the high ups and rightly passed the order dated 09.10.2013 and on the basis of that order, the respondent No.4 prepared seniority list according to Law. Para No.(d) is incorrect, the seniority list was prepared in the light of the direction of high ups dated 09.10.2013.

11

11

πĒ

<u>112</u>

<u>.</u> 30

512

 $\overline{122}$ 

ធ៌៍

013

01

101

201

201

201

d.

e.

f.

g.

h.

Para No.(e) is incorrect. Respondents No.5 to 7 are senior to appellant as per the seniority list issued by respondent No.4 as directed by respondent No.2.

Para No.(f) is incorrect. The seniority list was prepared according to Law.

Para No.(g) is incorrect, after creation of new District Tor Ghar which is situated in far flung/unattractive area, the high ups of police department gave incentive on the report of respondent No.4 just to smooth running of the government functionary and encourage the police officials.

Para No.(h) is incorrect, the detail has been given in the above paras.

Para No.(i) is incorrect. Respondent No.4 has rightly prepared the seniority list obeying the order of respondent No.2 dated 09.10.2013 which is according to police rules and Law.

Para No.(j) is incorrect, the seniority list was prepared by respondent No.4