

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

C.M No. _____/2023 in

Appeal No. 1337/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 9684

Dated 05-12-2023

Atta Ur Rehman son of Nasib Khan (Police Constable), resident of Sandrae,
Patrak, Tehsil Dir, District Upper Dir.

..... Applicant/Appellant

Versus

1. District Police Officer Dir Upper, and others

..... Respondents

Application for interim injunction directing the respondents to include the name of appellant/ applicant in the lower college course to be commenced from 06-12-2023 vide Letter No. 3118-68.

Honorable Sir's;

1. That alongwith instant application an appeal has also been filed wherein no date of hearing has been fixed yet, all the grounds taken in the appeal may considered as part and parcel for the maintainability of instant application.
2. That the appellant was dismissed from service on 06-08-2018 and on acceptance of his service appeal by this Honorable Tribunal vide Judgment and Order dated 09-11-2021 the applicant was reinstated to his service.
3. That since the period of inquiry leading to dismissal till the reinstatement i.e approximately 6 long years the appellant was deprived from several exams and courses necessary for his promotion.
4. That this Honorable Court while fully accepting the appeal of the appellant reinstated the services of the appellant with full back benefits which entitles the appellant for the due promotions during the period of his dismissal.
5. That after his reinstatement the appellant also qualified his test for participation in the lower college course. Test result is attached.

Hearing 06-12-23

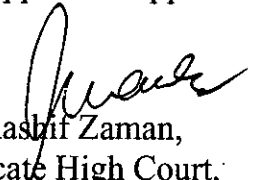
6. That the respondents are reluctant to send the applicant for the lower course which is necessary for his promotion failing which may cause irreparable loss to the applicant.
7. That the applicant has a prima facie case and there is every hope of its success and the balance of convenience also lies in his favour.
8. That any other ground with the prior permission of this Honorable Court.

It is therefore most humbly prayed that on acceptance of instant application the respondents may please be directed to include the name of appellant/ applicant in the lower college course to be commenced from 06-12-2023 vide Letter No. 3118-68.

Dated: 05-12-2023

Applicant/Appellant

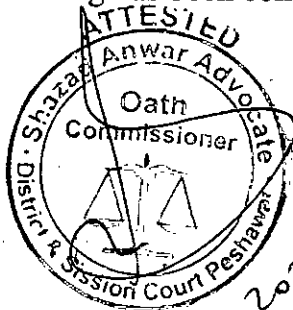
Through


Kashif Zaman,
Advocate High Court,
Email: Advocate_kashif@gmail.com
Cell: 0333-9173726

Affidavit:

It is solemnly affirmed and declared on oath that the contents of the appeal are true and correct and that nothing has been concealed from this Honorable Tribunal.


Deponent.



05-12-2023

SIGNAL/T.P.MESSAGES

FROM: COMDT: PTC HANGU (.)
TO: ADDL: IG INVESTIGATION, ELITE FORCE PESH: (.)
CCPO PESH (.)
ALL RPOs IN KP (.)
DIG SPL: BRANCH, CTD/TELE & TRAFFIC PESH: (.)
COMDT: FRP AND CPC PESH: (.)
ALL DPOs IN KP (.)
ALL S&P FRP RANGES IN KP (.)
DIRECTOR FSL, PESH: (.)
ALL POLICE TRAINING/TRAFFIC SCHOOLS IN KP (.)
(W) W/IGP KP PESH (.)
ADDL: IG POLICE HQRS PESH: (.)
DIG TRAINING PESH (.)

NO. 3118-68 /GC, DATED 27/11/2023 (.) SUB: (.) 2ND TERM OF LOWER COLLEGE COURSE-2023 (.) 2ND TERM OF LOWER COLLEGE COURSE-2023 WILL COMMENCE FROM 06-12-2023 (.) QUALIFIED/SELECTED CANDIDATES FOR THE SUBJECT COURSE WITHIN ALLOTTED/PREScribed QUOTA MAY PLEASE BE SENT TO PTC HANGU ON 06-12-2023 BEFORE 16:00 HRS ALONGWITH ORIGINAL CNIC, COMPLETE UNIFORM KIT, MEDICAL FITNESS CERTIFICATES AND NOMINAL ROLL IN THE FORM PRESCRIBED IN PTC MANUAL RULE NO.85 (II) (.) MOREOVER THERE SHOULD BE NO DEPARTMENTAL ENQUIRY ON GOING/PENDING AND NO CRIMINAL CASE AGAINST ANY TRAINEE (.) FURTHERMORE THE CANDIDATES MAY BE INFORMED THAT THEY ARE NOT ALLOWED TO BRING THEIR SMART PHONE WITH THEMSELVES DURING TRAINING, IN THIS CONNECTION A LETTER HAS ALREADY BEEN SENT TO ALL CONCERNED VIDE THIS OFFICE MEMO: NO. 346-70/PA DATED 19-05-2021 (.) SPECIAL SECURITY ARRANGEMENTS MAY BE MADE WHILE SENDING THE TRAINEES (.) POLICE PESH: (.) ADDL: ISGP TRG:/HQRS: AND DIG TRAINING KP (.) FOR F/O INFO: PLEASE (.)

*Attested
by counsel
[Signature]*

[Signature]
COMDT: PTC HANGU (.)

CNIC 1570192644815

ROLL NO 22103

NAME ATTAURRAHMAN

FATHER NAME NASIB KHAN

PAPER-A MARKS/ 92
180

PAPER-B MARKS/ 8
20

TOTAL MARKS 100
OBT:/ 200

*Attested
by Counsel
[Signature]*