

S.No. Of Order or proceedings	Date of Order or proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary.
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2.6.2015

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT SWAT

APPEAL NO. 1156/2012

(Hazrat Hussain-vs-PPO, Khyber Pakhtunkhwa and two others).


JUDGMENT


MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:

Appellant with counsel and Mr. Khawas Khan, S.I (legal) alongwith Mr. Anwar-ul-Haq, Govt. Pleader for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today in connected appeal No.1153/2012 titled ' Mian Rahim Jan-vs-PPO KPK -etc', the impugned order dated 10.7.2012 is set aside. The fate of appellant shall be subject to outcome of fresh inquiry which shall be expeditiously conducted and concluded within a period of three months. The appeal is accepted in the above terms. Parties are, however, left to bear their own costs. File be consigned to the record.

ANNOUNCED
2.6.2015


 (Muhammad Azim Khan Afridi)
 Chairman


 (Abdul Latif)
 Member

17) 03.03.2015

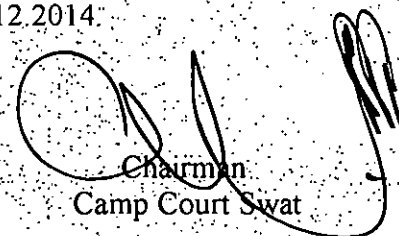
Appellant with counsel and Mr. Khawas Khan, S.I (legal) for respondents alongwith Mian Amir Qadir, GP present. Arguments could not be heard as the appeal before Bench-II reflecting in the order sheet of this Bench dated 02.09.2014 has not been transferred and moreover, the Bench is incomplete. To come up for final hearing before D.B on 02.06.2015 at Camp Court Swat.

(CHAIRMAN)
Camp Court Swat

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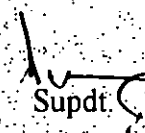
2.9.2014

Appellant with counsel (Mr Imdadullah, Advocate) and Mr Khawas Khan, S.I (legal) on behalf of respondents with Mian Amir Qadir, G.P present. Representative of the respondents produced copy of the inquiry report dated 24.5.2012, which is placed on file of appeal No.1153/2012, and copy thereof is also provided to the learned counsel for the appellant for arguments. Arguments could not be heard due to incomplete Bench. Representative of the respondents pointed out that a similar nature case, involving similar issues for determination, is pending at Peshawar before learned Bench-II. In order to avoid conflicting decisions, representative of the respondents is directed to make request to the learned Bench-II for transfer of the said case to the camp court Swat for further proceedings in the case alongwith connected appeals or else the matter be brought to the notice of the undersigned. To come up for arguments alongwith connected appeals at camp court Swat on 2.12.2014.


Chairman
Camp Court Swat

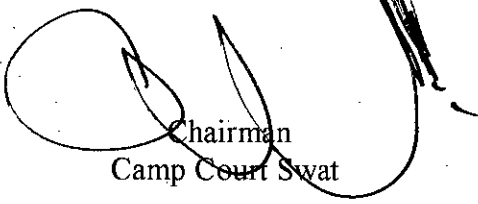
02.12.2014

Counsel for the appellant (Mr Imdadullah, Advocate) and Mr Khawas Khan, S.I (Legal) on behalf of respondents with Mr. Muhammad Zubair, Senior G.P present. The Tribunal is incomplete. To come up for arguments alongwith connected appeals at camp court Swat on 03.03.2015.


Supdt.

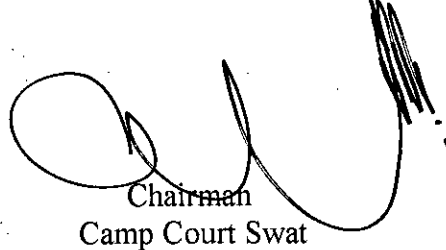
4.3.2014

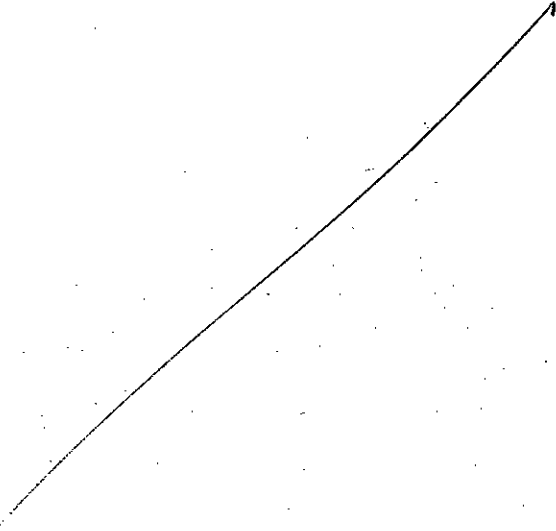
Clerk of counsel for the appellant and Mr.Khawas Khan, S.I(legal) with Mr.Muhammad Zubair, Sr.GP for the respondents present. Arguments could not be heard due to strike of the Bar. To come up for arguments alongwith connected appeals at camp court Swat on 3.6.2014.


Chairman
Camp Court Swat

3.6.2014

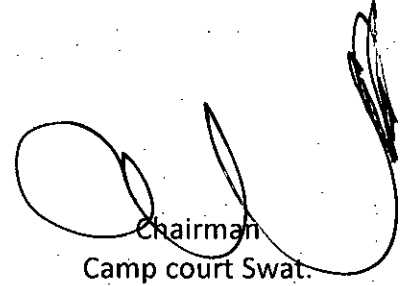
Appellant with counsel (Mr.Imdadullah, Advocate) and Mr.Khawas Khan, S.I(legal) with Mr.Muhammad Zubair, Sr.G.P for the respondents present. Copies of the relevant service record of the appellant produced by the representative of the respondents, which are placed on file for arguments alongwith connected appeals at camp court Swat on 2.9.2014.


Chairman
Camp Court Swat



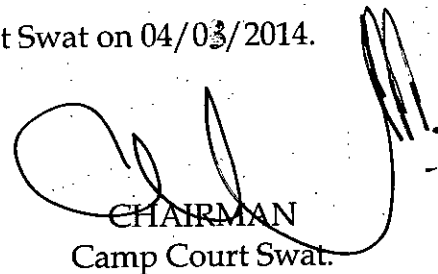
03/09/2013

Appellant with counsel and Mr. Khawas Khan, S.I.(legal) for respondents with Mr. Muhammad Arif , SPL . G.P. present. Arguments could not be heard due to incomplete bench. To come up for arguments at camp court swat on 03/12/2013.


Chairman
Camp court Swat.


03.12.2013

Appellant with counsel (Mr. Imdadullah, advocate) and Mr. Khawas Khan, S.I (legal) for respondents with Mr. Muhammad Zubair, Sr.G.P present. Arguments could not be heard due to pre-occupation of learned counsel for the appellant (Mr. Aziz-ur-Rehman, advocate) in 'Darul Qaza' Swat and incomplete Bench. The parties are directed to make available service record, if any, prepared subsequently to so-called absorption of the appellant as Follower Constable for determination of the status of the appellant as a Follower Constable and arguments on merits of the appeal along with connected appeals at camp court Swat on 04/03/2014.


CHAIRMAN
Camp Court Swat.

6.5.2013

Appellant with counsel and Mr. Khawas Khan,
C.I(legal), for respondents with MS.Amina, G.P present.
Written reply on behalf of respondents received,
copy whereof is handed over to the learned counsel
for the appellant for rejoinder at camp court Swat
on 3.6.2013.


Chairman
Camp Court Swat


3.6.2013

Appellant with counsel and Mr. Khawas Khan,
S.I(legal) for respondents with Mr. Muhammad Zubair,
Sr.G.P present. Rejoinder received, copy whereof is
handed over to the learned Sr.G.P for arguments at
camp court Swat on 3.9.2013.


Chairman
Camp Court Swat

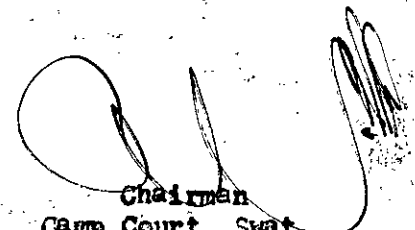
05-03-2013

Appellant with counsel and Mr. Khawas Khan , S.I.(legal) for respondents with Main Amir Qadar, G.P Present. Preliminary arguments heard .The learned Counsel for the appellant argued that after initial appointment on contract basis, the appellant was enlisted as C-IV Government Servant In BPS-1 and subsequently absorbed as Follower Constable (BPS-5); but on the direction of Central Police Office, the authority dispensed with his services on the basis of one sided inquiry ,without following the procedure prescribed for departmental proceedings inquiry and serving the Appellant with show cause notice so as to provide him opportunity of hearing and defence .The Appellant preferred departmental ^{appeal} against the Impugned order dated 10-07-2012 within time, and when received no response within the statutory Period ,he lodged this appeal. The points raised at the bar need Consideration. Therefore, the appeal is admitted to regular hearing Process fee and Security be deposited within 10 days. To come up for written reply /comment at Camp Court swat on 01-04-2013.


Chairman
Camp Court Swat

01.4.2013

Appellant with counsel (Mr.Imdadullah, Advocate) and Mr.Khawas Khan, S.I(legal) for respondents with Mr.Anwar-ul-Haq, G.P present. Written reply has not been received. To come up for written reply/comments alongwith connected appeals at camp court Swat on 6.5.2013.


Chairman
Camp Court Swat

12.2.2.2013

Appellant in person and Mr. Khawas Khan,
S.I (legal) for respondents with Mian Amir Qadir,
G.P present. Arguments could not be heard due to
strike of the High Court Bar. To come up for
preliminary hearing alongwith connected appeals
at camp court Swat on 4.3.2013.



Chairman
Camp Court Swat

04/03/2013.


Appellant in person and Mr. Khawas
Khan, S.I (legal) for respondents with
Mian Amir Qadir, G.P Present. Preliminary
arguments could not be heard due to strike of
the Bar. To come up for preliminary hearing
alongwith connected appeals on 05/03/2013.



Member
Camp Court Swat.

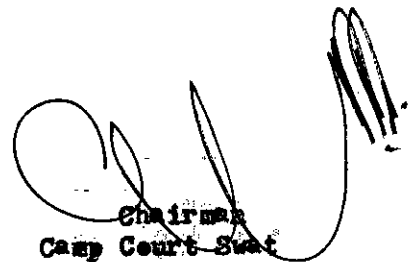
07/01/2013

Appellant with counsel and Mr. Khwas Khan, S.I (legal) present. Mr. Khawas Khan submitted copy of the initial appointment order of the appellant showing his appointment on contract basis. The learned counsel for the appellant contended that notwithstanding initial appointment on contract basis, once the appellant is absorbed in regular service as Follower Constable his status would be of a regular employee. The learned counsel for the appellant, however, requested for further time to provide further assistance in this regard. To come up for further preliminary hearing alongwith connected appeals at camp court swat on 11/02/2013.


CHAIRMAN
Camp Court Swat.

11.2.2013

Appellant in person and Mr. Khawas Khan, S.I (legal) for respondents with Mian Amir Qadir, G.P present. Arguments could not be heard due to strike of the Bar. To come up for preliminary hearing alongwith connected appeals on 12.2.2013.


Chairman
Camp Court Swat

3.12.2012



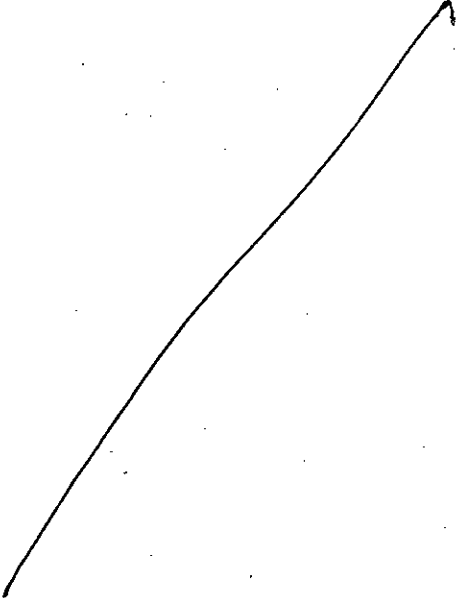
Appellant with counsel (Mr. Imdadullah, Advocate) present. Arguments partly heard. The appellant has not submitted his initial appointment order alongwith his appeal so as to determine the fact whether he was appointed as regular employee or was on contract basis. The appellant ^{also} is not in possession of the initial appointment order. Therefore, a pre-admission notice be issued to the respondents for production of service record of the appellant, including the initial appointment order of the appellant, for further preliminary hearing at camp court East on 7.1.2013. Mr. Khawas Khan, S.I (legal) is present in other cases, who is directed to bring the requisite record, and he should be provided a copy of the appeal for the purpose.


Chairman
Camp Court East

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1156/2012

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2.	3
1	23/10/2012	<p>The appeal of Mr. Hazrat Hussain presented today by Mr. Aziz-ur-Rahman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2.	12-11-2012	<p>This case is entrusted to Touring Bench Swat for preliminary hearing to be put up there on <u>03-12-2012</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

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

Service Appeal No. 1156 of 2012

Hazrat Hussain

...Appellant

VERSUS

The Provincial Police Officer, Khyber Pakhtunkhwa and others

...Respondents

INDEX

S #	Description of documents	Annexure	Pages
1.	Memo of Appeal	1-3
2.	Memo of addresses	4
3.	Copy of the order	A	5
4.	Copy of the order	B	6
5.	Copy of the order O.B. No. 129 dated 10/07/2012	C	7
6.	Copy of the departmental representation	D	8-9
7.	Wakalat Nama	10

Appellant through



Aziz-ur-Rahman

Advocate High Court
Office: Khan Plaza, Gulshan
Chowk, Mingora, District Swat.

Cell No. 0300-9070671

①

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

Service Appeal No. 1156 of 2012

Constable Hazrat Hussain No. 2632 Police Lines,
Iqbal Javed Shaheed, Swat.

...Appellant

Ch. W. F. Peshawar
Secty No. 1195
Dated 23/10/12

VERSUS

1. The Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Inspector General of Police Malakand Region at Saidu Sharif Swat.
3. The District Police Officer, District Swat at Gulkada.

...Respondents

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 against the order OB No. 129 dated 10-07-2012 of the respondent no. 3 vide which the appellant was reverted to Class IV from Follower Constable against law and rules and against which the appellant preferred a departmental representation to the respondent No. 2 on which no action is taken as yet despite the lapse of statutory period

23/10/12

Prayer:

That on acceptance of this appeal the order of the respondent No. 3 may very kindly be set aside and the appellants restored as Follower Constables

Respectfully Sheweth:

2

Facts:

1. That the appellant was recruited in the Police Force as Class IV by the respondent No. 3 vide OB No. 109 dated 24-08-2009 and since then was regularly performing his duties to the satisfaction of the authorities. Copy of the order is enclosed as Annexure "A".
2. That the appellant was absorbed as Follower Constable by the respondent No. 3 vide order OB No. 223 dated 01-11-2011 and was allotted Constabulary No. 2632. Copy of the order is enclosed as Annexure "B".
3. That the appellant was performing his duties most efficiently and confidently without giving his authorities any chance of complaint, whatsoever till date.
4. That the appellant was all of sudden reverted back as Class IV from Follower Constable by the respondent No. 3 vide order OB No. 129 dated 10-07-2012 against the law and rules. Copy of the order is enclosed as Annexure "C".
5. That the appellant feeling aggrieved from the impugned order preferred a departmental representation to the respondent No. 2 which is still pending disposal despite the lapse of statutory period, hence this appeal on the following grounds.
Copy enclosed as Annexure "D".

Grounds:

- a. That the respondents have reverted the appellant in glaring disregard for the mandatory provisions of law to the detriment of the appellant.
- b. That no inquiry has ever been conducted at all by the respondents and they have passed the impugned order in vacuum.

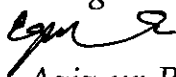

- c. That the respondents have violated the golden principles while passing the impugned order.
- d. That the respondents have misused the official authority in and have resorted to colorful use of the same, which the law never permits and is discouraged by the Apex Supreme Court of Pakistan in plethora of judgments.

It is, therefore, very respectfully prayed that on acceptance of this appeal the impugned order may very kindly be set aside and the appellant be restored as Follower Constable.

Any other relief deemed appropriate may also very kindly be granted.

Appellant

 Hazrat Hussain

Through Counsels,

 Aziz-ur-Rahman

 Imdad Ullah


Advocates Swat

Affidavit

It is stated on Oath that all the contents of this appeal are true and correct to the best of my knowledge and nothing has either been misstated or concealed before this Honourable Tribunal.

Deponent

 Hazrat Hussain


 Muhammed Nisar Advocate
 Oath Commissioner
 District Courts Swat
 NO 393 22/10/2

(4)

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

Service Appeal No. _____ of 2012

Hazrat Hussain

...Appellant

VERSUS

The Provincial Police Officer, Khyber Pakhtunkhwa and others

...Respondents

MEMO OF ADDRESSES

Address of appellant:-

Hazrat Hussain No. 2632 Police Lines, Iqbal Javed Shaheed, Swat.

Addresses of respondents:-

- (1) The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar
- (2) The Deputy Inspector General of Police Malakand Region at Saidu Sharif, Swat
- (3) District Police Officer, District Swat at Gul Kada

Appellant through



Aziz-ur-Rahman

Advocate Swat

ORDER

Annexure "A"

5

Mr. Hazrat Hussain son of Mr. Saifullah Khan resident of Village and Police Station Saidu Sharif, District Swat is hereby enlisted as Class -IV Govt: servant against the existing vacancy of this District in BPS 1(2970-90-5670) on temporary basis subject to Medical fitness and verification from the local Police.



District Police Officer, Swat

A.Haq/



O.B No. 109

Dated 28.8. /2009.



ATTESTED

Advocate

ORDER:

Annexure

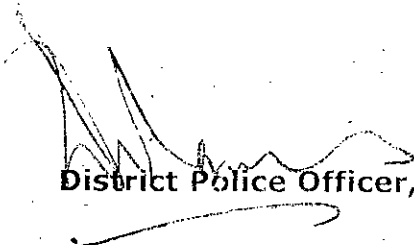
'B'

6

Mr. Hāzrat Hussain Class IV Govt. Servant of this District Police is hereby observed as Tailor Master Constable with immediate effect. He is also allotted constabulary No. 2632

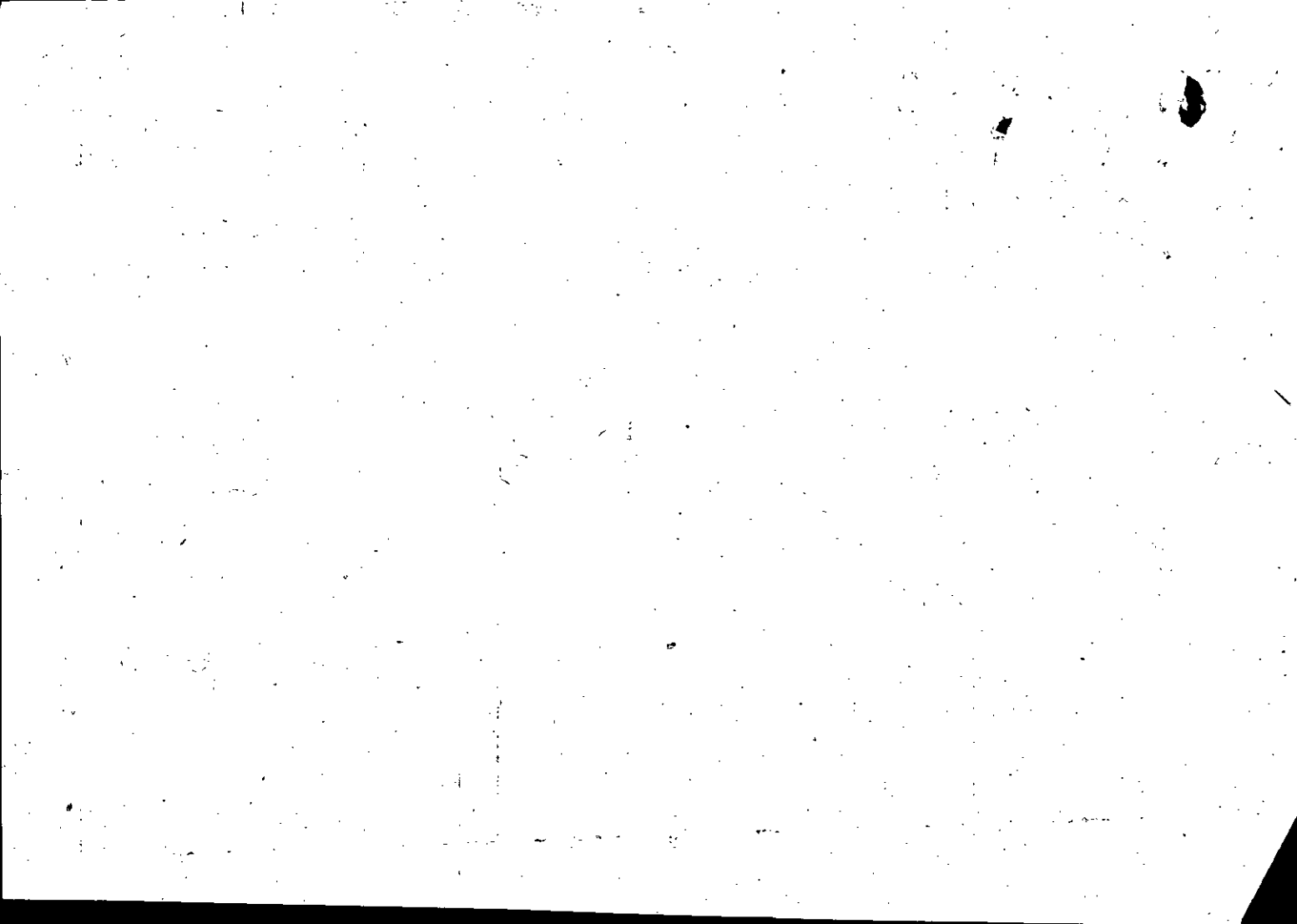
OB NO. 223

Dated 1-11 /2011


District Police Officer, Swat

ATTESTED


Advocate



7

Annexure-----

ORDER

In compliance of C.P.O, Khyber Pakhtunkhwa, Peshawar decision vide Memo: No. 12055/E-II, dated 13/06/2012 and Region Office Endst: No. 6979/SB, dated 20/06/2012, the order of the following Follower Constables absorbed from Class-IV servants and 02 S.P.F Constables (Contract) absorbed / enlisted as Class-IV have been declared as cancelled. Brief facts are that the Region Office, Swat vide Memo: No. 2391/SB, dated 06/03/2012 addressed to C.P.O, Khyber Pakhtunkhwa, Peshawar that all these absorption / enlistment have been made by the D.P.O, Swat without completing codal formalities and advertisement in the newspaper with the suggestion for enquiry. In the light of which the C.P.O, Peshawar conducted enquiry through Deputy Inspector General of Police, Enquiry & Inspection, C.P.O, Peshawar vide Endst: No. 5042/E-II, dated 14/03/2012.

S. No.	Name	Remarks	OB / Dated
1.	Class IV Mian Bakht Said of Region Office Swat.	Absorbed as Follower Constable & Allotted Constabulary No. 594	OB No. 168 dated 13/08/2011
2.	Class IV Mian Rahim Jan	Absorbed as Follower Constable & Allotted Constabulary No. 709	OB No. 217 dated 25/10/2011
3.	Class IV Irfan	Absorbed as Follower Constable & Allotted Constabulary No. 560	OB No. 233 dated 17/11/2011
4.	Class IV Akhtar Gul	Absorbed as Follower Constable & Allotted Constabulary No. 262	OB No. 235 dated 19/11/2011
5.	Class IV Habib Ullah s/o Aziz ur-Rahman	Absorbed as Follower Constable & Allotted Constabulary No. 149	OB No. 236 dated 21/11/2011
6.	Class IV Aziz Ur Rahman	Absorbed as Follower Constable & Allotted Constabulary No. 861	OB No. 243 dated 30/11/2011
7.	Class IV Allah Bakhsh	Absorbed as Follower Constable & Allotted Constabulary No. 544	OB No. 3 dated 04/01/2011
8.	Class IV Hazrat Hussain	Absorbed as Follower Constable & Allotted Constabulary No. 2632	OB No. 233 dated 01/11/2011
9.	S.P.F Const. Habib Ullah No. 1086 (Contract) s/o Taj Malook	Absorbed as Class IV w.e.f 01/10/2011.	OB No. 197 Dated 26/09/2011
10.	S.P.F Const. Imran No. 1062 (Contract)	Absorbed as Class IV w.e.f 01/10/2011.	OB No. 197 Dated 26/09/2011

The C.P.O, Khyber Pakhtunkhwa, Peshawar vide Memo No. 12055/E-II, dated 13/6/2012, received in this office vide Region Office, Endst: No. 6979/SB, dated 20/06/2012 passed decision on the enquiry report conducted by the Superintendent of Police, Enquiry & Inspection, C.P.O Peshawar that during enquiry it has been proved that the appointment in question were made without observing laid down procedure / policy, upon which C.P.O, Peshawar further passed decision that these

ATTESTED
[Signature]
Advocate

7A

irregular appointment be cancelled and transparent based on merit appointments be made, after fulfilling all the rules and legal requirements.

Keeping in view of position explained above, the absorption / enlistment orders as noted against each of above personnel are hereby cancelled with immediate effect.

OB No. 129

Dated: 10-7-2012.


District Police Officer, Swat

No. 7186-88/OASI, Dated 10-7- /2012.

Copies of above for information & necessary action to the:-

1. Deputy Inspector General of Police, Malakand Region, Saidu Sharif, Swat w/r to Region Office Endst: No. 6979/SB, dated 20/06/2012.
2. Superintendent of Police, Investigation, Swat.
3. OASI Special Force.


District Police Officer, Swat

(r)

۵۔ یہ کہ سائل کے احسن کارکردگی کے پیش نظر D.P.O صاحب ضلع سوات جملہ کوائف کو مد نظر رکھتے ہوئے سائل کا حکم بحیثیت کانٹریبل بحوالہ OB No. 223 مصدرہ 01/11/2011 کو صادر فرمایا اور یوں نمبر 2632 الاٹ کیا۔

۶۔ یہ کہ سائل تاہنوز بہ طریق احسن ایمانداری اور دیانتداری سے اپنے فرائض منصبی افران بالا کے مکمل تسلی کیساتھ سرانجام دیتا چلا آ رہا ہے۔
حاجی علی محمد صاحب
OB 123
1.11.011

۷۔ یہ کہ سائل ایف اے کو ایف اے اور مستقبل اعلیٰ تعلیم حاصل کرنے پر نظریں جمایا ہوا ہے۔
الاطح ہو کر جسے مذکورہ ہے

۸۔ یہ کہ سائل محکمہ پولیس کیلئے ایک سرمایہ ہے نہ کہ ایک بوجھ ہے۔
حاجی علی محمد صاحب
OB 129
13.6.12

۹۔ یہ کہ سائل کو موقع دیا جا کر سائل کے ایمانداری اور دیانتداری سے محکمہ پولیس کا نام درخشندہ ہوگا۔
حاجی علی محمد صاحب
OB 129
10.7.12

۱۰۔ یہ کہ سائل اپنے فرائض منصبی عبادت سمجھ کر سرانجام دیتا چلا آ رہا ہے اور اتندہ بھی کسی قسم کی کمی یا شکایت کا موقع نہیں دے گا۔
حاجی علی محمد صاحب
OB 129
30.7.012

لہذا استدعا کی جاتی ہے کہ بمنظوری درخواست نظر ثانی درجہ درخواست احکامات معترضہ کو منسوخ وکالعدم قرار دیکر سائل کو بحیثیت کانٹریبل فرائض منصبی کا موقع دیکر داری فرمائی جاوے۔

forwarded file

Handwritten signature
K. S. Laine
21.7.11

Plaintiff
عریض
کانٹریبل حضرت حسین نمبر 2632

متعینہ جاوید اقبال شہید پولیس لائن سوات (سائل)

it Relate to OAS
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29/7

510
forwarded
ATTESTED
Handwritten signature
Advocate

DSP/11
23

بعدالت صندھ سندھ سٹریٹجی لینڈ رولنگ ضلع ٹھٹھار

کوریٹ فیس	قیمت ایک روپیہ
-----------	----------------

مورخہ 18 اکتوبر 2012ء منجانب سپرائیڈ
 مقدمہ جنرل حسین بنام گلبرگ
 دعویٰ سہولتیں
 جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام لیتھما و ریلوے / جنرل حسین ما امداد اللہ ریلوے لکھنؤ مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زراں پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہاگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سندھ ہے

المرقوم 18 ماہ اکتوبر 2012ء

گواہ شدہ العبد
 Attested and Accepted by
 بمقام ٹھٹھار
 کد

ORDER

Signature ^{"A"} (5)

Mr. Hazrat Hussain son of Mr. Saifullah Khan resident of Village and Police Station Saidu Sharif, District Swat is hereby enlisted as Class -IV Govt: servant against the existing vacancy of this District in BPS 1(2970 90-5670) on temporary basis subject to Medical fitness and verification from the local Police.

District Police Officer, Swat
"A.Ilaq/"

O B No. 109

Dated 28.8. /2009.

RECEIVED

28/8/09

B

6

Advocate

ORDER:

Mr. Hazrat Hussain Class IV Govt. Servant of this District Police is hereby observed as Tailor Master Constable with immediate effect. He is also allotted constabulary No. 2652

District Police Officer, Swat

OB NO. 123

Dated 1-11 /2011

ADVOCATE
[Signature]
Advocate

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

Service Appeal No.1156/2012.

Titled

Hazrat Hussain No. 2632 Police Lines, ~~Javid 1960~~ Shaheed Swat.

VERSUS

Appellant.

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, Malakand Region Saidu sharif Swat.
3. District Police Officer, District Swat at Gulkada.

Respondents.

WRITTEN REPLY TO APPEAL ON BEHALF OF RESPONDENTS.

Respectfully Shewith,

The reply to appeal on behalf of Respondents No. 01 to 03 is submitted as below.

1. Preliminary Objections.

1. That the appellant has got no Cause of action and locus standi.
2. That the appeal is time barred.
3. That the appeal is not maintainable in its present form.
4. That the appellant is estopped by his own conduct to file the instant appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of the necessary parties.
6. That the appellant has not come to the Tribunal with clean hands.

2. FACTS.

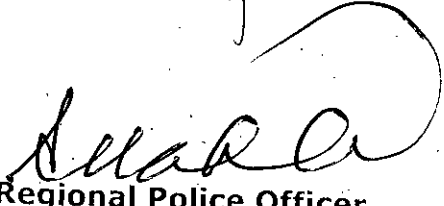
1. Para No. 1 of appeal pertains to appellant's service record.
2. Para No. 2 of appeal is correct to the extent that he was absorbed as Follower constable by the then respondent No. 3 but the same absorption/enlistment was made without fulfillment of codal formalities and advertisement in the newspapers.
3. Para No. 3 of appeal pertains to service record.
4. Para No. 4 of appeal is incorrect, appellant's absorption was made without completing codal formalities at that time and when this irregularity has come to the notice of respondent No. 2, he communicated the same to CPO, Khyber Pakhtunkhwa, Peshawar vide letter No. 2391/SB dated 06.03.2012 consequent upon which Deputy Inspector General of Police, Enquiry & Inspection CPO Peshawar conducted enquiry during which it has been proved that such absorption was made without observance of laid down procedure/policy, hence appellant's absorption order was cancelled by the respondent No. 3 vide OB No. 129 dated 10.07.2012.
5. Para No. 5 of appeal is correct to the extent that appellant filed departmental appeal but the same was without any legal substance and merits hence the appellate authority filed/turn down the same.

3. GROUNDS.

- A. Incorrect, appellant was absorbed/enlisted without observing codal formalities and against the laid down procedure, which was cancelled subsequently on the basis of recommendation of enquiry conducted by CPO through Deputy Inspector General of Police, Enquiry & Inspection Peshawar.
- B. Incorrect, reply already given vide para 04 above.
- C. Incorrect, respondent have not violated any law, but undo the order of the then Respondent No. 3 and passed speaking order vide OB No. 129 dated 10.07.2012.
- D. Incorrect, respondents have used their official authority purely in accordance with law/rules and on merit keeping in view the principle of Natural Justice.

It is therefore humbly prayed that the appeal of appellant may very kindly be dismissed being devoid of merits with cost.

1) 
Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 1)

2) 
Regional Police Officer,
Malakand at Saidu Sharif Swat.
(Respondent No. 2)

3) 
District Police Officer, Swat.
(Respondent No. 3)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

SERVICE APPEAL 1156/2012

Hazrat Hussain No. 2632 Ex-Constable District Swat

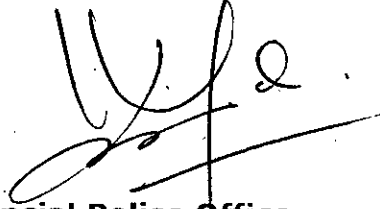
VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar
2. The Regional Police Officer, Malakand at Saidu Sharif Swat.
3. The District Police Officer, Swat.

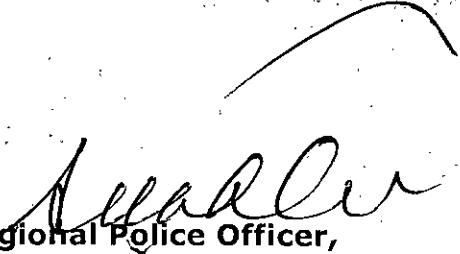
Respondents.

AFFIDAVIT:-

We, the above Respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/ true to the best of our knowledge/ belief and nothing has been kept secret from the honorable Service Tribunal Khyber Pakhtunkhwa, Peshawar.



**1) Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 1)**



**2) Regional Police Officer,
Malakand at Saidu Sharif Swat.
(Respondent No. 2)**



**3) District Police Officer, Swat.
(Respondent No. 3)**

ORDER

In compliance of C.P.O, Khyber Pakhtunkhwa, Peshawar decision vide Memo: No. 12055/E-II, dated 13/06/2012 and Region Office Endst: No. 6979/SB, dated 20/06/2012, the order of the following Follower Constables absorbed from Class-IV servants and 02 S.P.F Constables (Contract) absorbed / enlisted as Class-IV have been declared as cancelled. Brief facts are that the Region Office, Swat vide Memo: No. 2391/SB, dated 06/03/2012 addressed to C.P.O, Khyber Pakhtunkhwa, Peshawar that all these absorption / enlistment have been made by the D.P.O, Swat without completing codal formalities and advertisement in the newspaper with the suggestion for enquiry. In the light of which the C.P.O, Peshawar conducted enquiry through Deputy Inspector General of Police, Enquiry & Inspection, C.P.O, Peshawar vide Endst: No. 5042/E-II, dated 14/03/2012.

S. No.	Name	Remarks	OB / Dated
1.	Class IV Mian Bakht Said of Region Office Swat.	Absorbed as Follower Constable & Allotted Constabulary No. 594	OB No. 168 dated 13/08/2011
✓2.	Class IV Mian Rahim Jan	Absorbed as Follower Constable & Allotted Constabulary No. 709	OB No. 217 dated 25/10/2011
✓3.	Class-IV Irfan	Absorbed as Follower Constable & Allotted Constabulary No. 560	OB No. 233 dated 17/11/2011
✓4.	Class-IV Akhtar Gul	Absorbed as Follower Constable & Allotted Constabulary No. 262	OB No. 235 dated 19/11/2011
✓5.	Class IV Habib Ullah s/o Aziz ur Rahman	Absorbed as Follower Constable & Allotted Constabulary No. 149	OB No. 236 dated 21/11/2011
✓6.	Class IV Aziz Ur Rahman	Absorbed as Follower Constable & Allotted Constabulary No. 861	OB No. 243 dated 30/11/2011
✓7.	Class IV Allah Bakhsh	Absorbed as Follower Constable & Allotted Constabulary No. 544	OB No. 3 dated 04/01/2011
✓8.	Class IV, Hazrat Hussain	Absorbed as Follower Constable & Allotted Constabulary No. 2632	OB No. 233 dated 01/11/2011
9.	S.P.F Const. Habib Ullah No. 1086 (Contract) s/o Taj Malook	Absorbed as Class IV w.e.f 01/10/2011.	OB No. 197 Dated 26/09/2011
10	S.P.F Const. Imran No. 1062 (Contract)	Absorbed as Class IV w.e.f 01/10/2011.	OB No. 197 Dated 26/09/2011

The C.P.O, Khyber Pakhtunkhwa, Peshawar vide Memo No. 12055/E-II, dated 13/6/2012, received in this office vide Region Office, Endst: No. 6979/SB, dated 20/06/2012 passed decision on the enquiry report conducted by the Superintendent of Police, Enquiry & Inspection, C.P.O Peshawar that during enquiry it has been proved that the appointment in question were made without observing laid down procedure / policy, upon which C.P.O, Peshawar further passed decision that these

ATTESTED

Associate

irregular appointment be cancelled and transparent based on merit appointments be made, after fulfilling all the rules and legal requirements.

Keeping in view of position explained above, the absorption / enlistment orders as noted against each of above personnel are hereby cancelled with immediate effect.

OB No. 129

Dated: 10-7/2012.

No. 7186-88 / OASI, Dated 10-7 / 2012.
District Police Officer, Swat

Copies of above for information & necessary action to the:-

1. Deputy Inspector General of Police, Malakand Region, Saidu Sharif, Swat w/r to Region Office Endst: No. 6979/SB, dated 20/06/2012.
2. Superintendent of Police, Investigation, Swat.
3. OASI Special Force.

From: The Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

To: The Deputy Inspector General of Police,
Malakand Region, Swat.

2591/SB
18-06-12

No. 2055/E-II, dated Peshawar the 13/06/2012.

Subject: INFORMATION REGARDING CLASS-IV ABSORBED AS
FOLLOWER CONSTABLE AND NEW ENLISTED
CLASS-IV SERVANT

Memo:

Please refer to your office letter No.2391/SB, dated 06-03-2012,
on the subject noted above.

2. The matter was enquired by the Deputy Inspector General of
Police, Enquiry & Inspection, Khyber Pakhtunkhwa, Peshawar. According to
Enquiry report conducted by SP/ Enquiry & Inspection, it has been proved that
appointment in question were made without observing the laid down
procedure/policy.

3. After perusal of Enquiry Report, the worthy PPO ordered as
under :-

**"these irregular appointments be cancelled and transparent
based on merit appointments be made, after fulfilling all the
rules and legal requirements"**

(MUHAMMAD IQBAL)
AIG/Establishment,
For Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

No. /E-II.
Copy of above alongwith original file is forwarded to the Deputy
Inspector General of Police, Enquiry & Inspection, Khyber Pakhtunkhwa,
Peshawar for information w/r to his letter No.39/E&I, dated 24-05-2012.

*Sir, Submitted for PPO perusal
and orders please.*

(MUHAMMAD IQBAL)
AIG/Establishment,
For Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

WDIS/MSD R-iii.

*DPO/Swat
For
order*

*copy to be received
to be unduly*

19/06/12
19/6

2

3

To : The Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

To : The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. 2391 /SB, dated Saidu Sharif, the 06-03 /2012.

Subject: INFORMATION REGARDING CLASS-IV ABSORBED AS
FOLLOWER CONSTABLE AND NEW ENLISTED CLASS-IV
SERVANT.

Memorandum:

It is submitted that the District Police Officer, Swat has
absorbed 8 Class-IV government servants as well as 2 SPF Constables as Follower
Constables and allotted Constabulary Nos. (copy of District Police Officer, Swat
Memo: No. 2888/EB dated 05/03/2012 is attached) without completing all codal
formalities and advertisement in the newspapers.

It is, therefore, requested that necessary enquiry into the
matter may kindly be ordered so that actual position is ascertained in the best
interest of public.

Enclosure (1)

[Signature]
Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

On 14/3/12

OFFICE OF THE PROVINCIAL POLICE OFFICER KHYBER PAKHTUNKHWA PESHAWAR.

No. 5042 /E-II, dated Peshawar, the 14/3 /2012.

Copy of above alongwith photo copy of DPO Swat letter
No.2888/EB, dated 5/3/2012 is forwarded to Dy:Inspector General of
Police E&I Khyber Pakhtunkhwa CPO with request to inquire the matter
and submit report to this office as approved by Addl:IGP/HQRS: Khyber
Pakhtunkhwa Peshawar.

Encl. One Photo
state.com

[Signature]
REGISTRAR, 13/3
FOR PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA,
PESHAWAR.

015
process it

Stamp: 82/Ext
14/3/2012
Khyber Pakhtunkhwa

14/3/2012

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1156/2012

Hazarat Hussain *versus* PPO K.P. and Others

*Rejoinder by the appellant to the written reply
of the respondents*

Respectfully Sheweth:

Preliminary Objections:

That all the preliminary objections are incorrect hence specifically denied for the reasons that the appellant has got prima facie case and has approached this Honourable Tribunal with in time and that too with clean hands.

On Facts:

1. Para 1 of the reply being admission needs no comments.
2. Para 2 of the reply is incorrect to the extent that the absorption of the appellant was made as per the law and rules, hence is denied to the extent.
3. Para 3 of the reply being admission needs no comments.
4. Para 4 of the reply is incorrect as is based on misstatement. The absorption of the appellant was made as per the law. Moreover the appellant was

never associated with any inquiry, hence this para is specifically denied.

5. Para 5 of the reply as drafted is incorrect hence denied for the reason that the appellant has got an established right, which was denied to him.

On Grounds:

- A. Ground a of the reply is incorrect and misconstrued as the appellant was absorbed in accordance with the law, hence the para is denied.
- B. Para b of the reply is incorrect and based on misstatement for the reasons given above, hence the para is specifically denied.
- C. Para c of the reply as drafted is self contradicted and the respondents are blowing hot and cold at the same time. The passing of the impugned order is made in clear violations of the mandatory provisions of law, hence the para is specifically denied.
- D. Para d of the reply as drafted is incorrect as the principles of natural justice have been clearly done away with and the respondents have used the official authority in a very colorful and an arbitrary manner, hence the para is denied.

It is, therefore, very respectfully prayed that on acceptance of this rejoinder the appeal of the

appellant may very kindly be decided as prayed for
in the appeal.

Appellant
Hussain
Hazarat Hussain

Through Counsels,

Aziz-ur-Rahman
Imdad Ullah
Aziz-ur-Rahman
Imdad Ullah

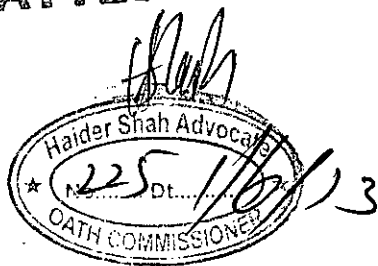
Advocates Swat

Affidavit:

It is stated on Oath that all the contents of this
rejoinder are true and correct to the best of my
knowledge and belief.

Deponent
Hussain
Hazarat Hussain

ATTESTED



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1/2011

BULARY NO. () in
BULARY NO. () in
BULARY NO. () in

DISTRICT
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DISTRICT

Name	Father's Name	Tribe or Caste	Village or Town	Post and Telegraph Office	Police Station	District	Province	Date of Birth	Height	Chest Measurement	Date of Enrolment	Age on Enrolment	Distinctive Marks
Hussein Houssein	Sayfallah Houssein	Aghas	Saada Sherif	Saada	Saada	Saada	K.P. 16	08.03.1975	5.7"	36" x 30"	20-8-2003 as CIV	20 years	

Verification Roll No. _____ Dated _____ Received back and attached to the Fauji Misal

Government Service prior to present employment, which is approved for pension service.

Service or Department	Rank or Grade	Pay of last appointment	From	To	Period		
					Years	Month	Days
Cause of and character on discharge from above service.			Reference to orders approving above service for pension service in the Police Department.				






I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that section and the provisions of the Act and the Rules issued under it and now in force, by which my discipline and conduct are governed have been explained to me. I agree to serve faithfully under the provisions of the said Police Act and to obey all lawful orders issued to me by my Superior Officers and undertake not to resign my appointment within three months from the date of my enrolment. I have received a certificate of appointment issued under section 8 of the Police Act (V of 1861).

ATTESTED

[Signature]
District Police Officer, Saada

[Signature]
Signature

Rolled impression of fingers and thumb of left hand.

Left Little	Left Ring	Left Middle	Left Index	Left Thumb
				

1	2	3	4	5
Appointment, promoted, suspended, reduced, discharged, dismissed, resigned or died.	To what grade and pay appointed, promoted or reduced.	Date	No. of District Order	Full Signature of Superintendent of Police
	<p>Observed as Parol Master Const.</p> <p>Const. BPS 5 (5400-250-13200)</p> <p>W. 1-11-2011</p> <p>pay Fixed Rs. 5400/-</p> <p><i>[Signature]</i></p> <p>Distt Police Officer, Saver</p>		<p>Order: 223</p> <p>1-11-2011</p>	<p>is hereby c</p> <p>also aHotte</p> <p>OB NO. ___</p> <p>ated ___</p>

7. TRANSFERS BEYOND THE DISTRICT

1	2	3	4
Date	From	To	Authority for transfer

COLL OF

8. NAMES OF RELATIVES IN GOVERNMENT SERVICE.

	2	3	4
1	Relationship	Nature of employ	District

RESIDENCE AND OTHER PARTICULARS OF HEIRS:

CP 834
10/11
Arun
B-S...
D...
17/11

Order

In Campaign of CPO KPC Police
Wider memo No 12055/B 4 dt 13-6-2012
Wider Region office Brest No 6978/51
dt 20-6-2012.

Order of Police Constable Hazrat
Haldain No 2632 is hereby cancelled
and abolished of class IV under
OB No 129 dt 10/7/2012
pay fixed Rs 5000/-

OB No 129

10-7-2012

CP 633 dt 6/12
Approved of ARIO
6/12/12
6/12/12
30/12/12
Dated: Police Officer, Surat
DPO/...

in red ink their nominated (with not more than two alternatives) and fill in name and particulars necessary to trace.

10. EDUCATIONAL QUALIFICATIONS

Educational Qualifications

Knowledge of Languages

als and Descripti

Enter designatio
Other special dec

Un-Educated

English

Slightly Educated

Persian

Matriculation

Urdu

First Arts

FA

Punjabi

Miscellaneous
om promotion

Degree

Pashto

Note: - Under line the qualifications possessed, and particulars where necessary and give date of entry.

11. PROFESSIONAL ATTAINMENTS AND SPECIAL QUALIFICATIONS:

Professional attainments:

Passed Training School Upper Class:

- • Intermediate Class
- • Lower Course
- • Finger Print Course
- • Drill Instructor's Course.
- •
- •
- •

Special Qualification
Clerical duties.

Accounts duties.

Orderly Head Constable's duties.

Moharrir's duties.

Detectives duties.

Traffic duties.

Prosecuting Inspectors,
Examinations,

Under line course passed and qualifications possessed.

Phone No. 0946-9240388
Fax No. 0946-9240390

From: The Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

To: The Provincial Police Officer,
NWFP, Peshawar.

No. 1083 /E, Dated Saidu Sharif the 2/3 /2009.

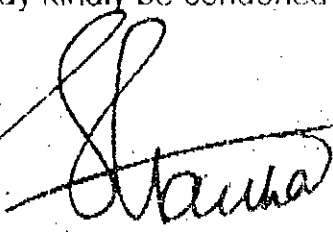
Subject: CONDONATION.

Memorandum:

This is submitted that the following candidates have submitted applications for enlistment as Constables in Swat District Police but they according to their date of birth have deficiency of upper age limit beyond 27 years age limit prescribed for recruitment:-

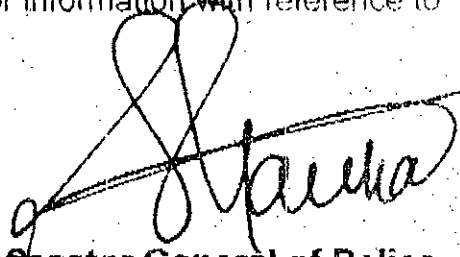
S.No.	Name	D/o Birth	Upper Age
1.	Hazrat Hussain s/o Saifullah Jan r/o Saidu Sharif Swat	08/03/1975	7 years
2.	Alamgir s/o Mirza Ali r/o Wanda Langarkhel Distrit / Teh: Lakki Marwat	14/04/1981	1 year

It is requested that their upper age limit may kindly be condoned for enlistment as Constable in Swat District.


Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

No. 1084 /E.

Copy to District Police Officer Swat for information with reference to Memo: No. 1311/OHC dated 26/02/2009.


Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.
[Signature]

VP

[Handwritten signature]

(For use in Police Department only)

Heirs:

- 1. _____
- 2. _____
- 3. _____

Entries in this part should be da

Signature: *Ha*

Verification Roll No. _____ dated _____ received back _____

Signature: *Vid*

her's name a

Left Thumb Impression



Age of birth by _____
rly as can be

Qualification	Date	Qualification	Date
---------------	------	---------------	------

act height by

English ✓		First Arts ✓ F.A.	
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ersonal mark:

Pushto ✓		B.L. Or B.A.	
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(Non-Gazett

Urdu ✓		Pleadership examiantion	
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ttle Finger

Plan-drawing ✓		Training School Final examiantion	
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iddle Finger

Finger Print ✓		Other qualification:—	
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thumb

Drill Instructing ✓			
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Court Duties			
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Reserve Duties			
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N.B.— Line to be drawn under the qualification possessed.

entire page should be renewed or re-attested at least every five years and the signature to be dated.

Name: Hazrat Hussain

Place: Afghan

Residence: village and P.S. Saidu-Sharif, Distt. Swat

Father's name and residence: Saijullah Khan

Date of birth by Christian era as early as can be ascertained: 8-3-1975

Date of actual height by measurement: 5-2

Personal marks for identification: F.A. A mole on left ear hand

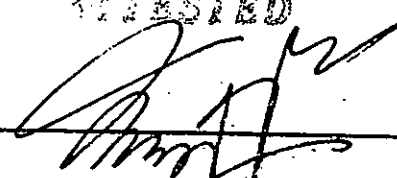
Left hand thumb and finger impression (Non-Gazetted) officer:

Little Finger  Ring Finger 

Middle Finger  Fore Finger 

Thumb 

Signature of Government Servant: 

Signature and designation of the head of the Office, or other Attesting Officer: 
Distt: Police Officer Swat.

7 Date of appointment	8 Designation of the officer Government of 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punish- ment or censure or praise of the Government Servant	
					Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
						Period			Government to which debitable
ad ary			order Abserved as Teacher master Constable						
			BPS- 5 (5900-25013200) in 1.7.11						
			pay fixed Rs. 5400/-						
			Order No. 223 dt 1.11.2011						
			order						
			In Compliance of CPO MPK fresh order with memo No 1955/2 dt 13-6-2012 with Regd office Order No 6878/SB dt 20-6-2012 order of follower Constable Nazim Hussain No 2032 is hereby called out and observed of class on with OB dt 28 Feb 10-7-2012. pay fixed Rs 5400/-						
			OB No 129 10-7-2012						

[Signature]
Distt: Police Officer, Svat.

[Signature]
Distt: Police Officer, Svat.

MP Med: No. 4

GS 9 PD NW/P, 10.31.11 2000 Ps of 100-5-10-37-(3)

MEDICAL CERTIFICATE

Official: Hazrat Hassan

Race: Afghan

Name: Sai Fullah Khan

Address: Haji Abad Saide Sharif

District: Distt Swat

Birth: 8-3-1975

Height by measurement: 5-2, 36 x 38

Mark of identification: _____

Signature of the Official: [Signature]

Signature of Head of Office: _____

Seal of Office

**DISTRICT POLICE OFFICER
SWAT**

I do hereby certify that I have examined Mr. Hazrat Hassan
for employment in the office of the DPA Swat

and discover that he had any disease communicable or other constitutional
bodily infirmity except nil

I do not consider this as disqualification for employment in the office of
DPA Swat

has age according to his own
(35) year and by appearance about 35 years.

Mr. A male on @ Side Neck.

LEFT THUMB AND FINGER

ON



MEDICAL SUPERINTENDENT

Civil Hospital

[Signature]
25/8/09

تھک پوئیس

(1) 17/11/11

2356 P.S. 55

ریکروٹ سبھی حضرت حسن کے پال چلن کی تصدیق نمبر

جو بھرتی کیا گیا ہے بطور کلاسی تاریخ

S & P.O. Saidu

Idu Sharif P.O. District Swat

نام ولدیت مسیف اللہ خان ذات افغان مذہب اسلام

سکونت محلہ آباد خانہ مسیح شریف مین مسیح شریف خانہ مسیح شریف ضلع

حالیہ 2-5 عمر سال 1875 ماہ 3 دن 8

شاخت کے نشان 36-38 چھائی

تاریخ تقریرزادہ افراخانہ

Babozai
North West

Abdul-Qayyum

114-37-0142

218192

نام	دن	ماہ	سال	تا	سے	عہدہ تنخواہ	استعداد علمی

نام اور ڈگری رشتہ داران کی اور عہدہ ان کا جو کہ سرکاری ملازم ہیں۔

نام اور رشتہ	عہدہ	مکانہ	جگہ

بذریعہ تحریر شدہ اعلام کرتا ہوں کہ اندراجات جو کئے گئے ہیں میرے بہترین علم کے مطابق صحیح ہیں۔

منتقل الیہم اشخاص نام اور پورا پتہ۔

بذریعہ تحریر شدہ اعلام کرتا ہوں کہ اندراجات جو کئے گئے ہیں میرے بہترین علم کے مطابق صحیح ہیں۔

دستخط نشان انگٹھا

اب سینئر سپرنٹنڈنٹ پولیس ضلع سوات

سپرنٹنڈنٹ پولیس ضلع

مقام کوٹ ایسپیکٹ ہتھم خانہ سید شریف کو براہ ضروری اندراجات بھیجا جاوے۔

ہم مسلمان ہیں لیکن ہذا آدھ روٹے اسرار کے مکلف ہیں
کہ صاحب حضرت حسن و علیہ السلام کے صاحبزادے ہیں اور ان کے
کوڑائی کوڑا لڑنے سے اس صاحبزادے کی ولادت ہوئی ہے۔
اور ان کے صاحبزادے حضرت اور ان کے صاحبزادے کے صاحبزادے
صاحب ہم تصدیق کرتے ہیں۔

مقامی پولیس اسٹیشن ہرگز مندرجہ
مقامی پولیس اسٹیشن ہرگز مندرجہ
مقامی پولیس اسٹیشن ہرگز مندرجہ

ان کے نام
ان کے نام
ان کے نام
ان کے نام
ان کے نام

S/maul
mm.Ps.S.S
29-08-99

Handwritten signature and stamp area with circular seal and text.

Vertical text on the right margin, possibly a date or reference number: 28/8/99

Handwritten mark or signature at the bottom right.

