

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Misc Application No. _____/2023

in

Service Appeal No.2298 /2023

Hamid Bad Shah

L.H.C, Belt No.01

Police Force, Kohat

.....Appellant.

Versus

The Provincial Police Officer KPK, Peshawar & others

.....Respondents.

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Hamid Bad Shah

Appellant

Through

Ashraf Ali Khattak

Ashraf Ali Khattak

Advocate,

Supreme Court of Pakistan

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Misc Application No...../2023

in

Service Appeal No.2298 /2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10067

Dated 22-12-2023

Hamid Badshah,
L.H.C, Belt No.01,
Police Force, Kohat

.....**Appellant.**

Versus

The Provincial, Police Officer,

Khyber Pakhtunkhwa,

Peshawar and others.**Respondents.**

**Application for submission of correct addresses of the
respondents from 05 to 36.**

PRAYER:

The appellant humbly submit as under.

1. That appellant appeal has been admitted for regular hearing, but due to incorrect addresses of the respondents from 05 to 36, notice to the respondents were not served and therefore appellant was directed to submit proper correct addresses.
2. That appellant has now procured the correct addresses of the respondent No.05 to 36 and is hereby attached with the instant application as **Annexure-I**.

- (2)
3. That the Hon'ble Tribunal vide order sheet dated 18-12-2023 has allowed the request of the appellant and directed to submit the needful with three days positively.

In view of the above humble submission the documents of the correct addresses of the respondents may kindly be placed on main file and appellant may allowed to submit process fee for summoning the respondents No.05 to 36.

Through

Hanif Badshah
Appellant

Ashraf Ali Khattak
Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

Ali Bakht
&
Ali Bakht
Ali Bakht
Advocate, Peshawar.

B

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ /2023

Muhammad Tariq,
L.H.C, Belt No.1044,
Police Force, Kohat

.....Appellant.

Versus

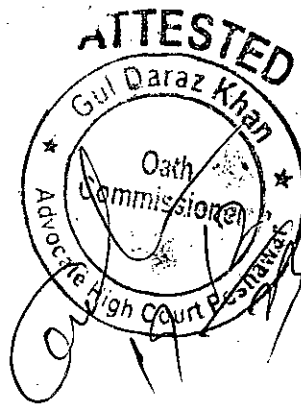
The Provincial Police Officer KPK, Peshawar & others

.....Respondents.

Affidavit

I, Hameed Badshah LHC, Belt No.01, Police Force, Kohat, do hereby solemnly affirm on Oath that the contents of the instant application are true and Correct to the best of my knowledge and belief and nothing has been concealed from the notice of this Hon'ble Tribunal.

Hameed Badshah
Deponent



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 2298 /2023

Hamid Bad Shah,
L.H.C, Belt No.01,
Police Force, Kohat

.....**Appellant.**

Versus

1. The Provincial, Police Officer,
Khyber Pakhtunkhwa,
Peshawar.
2. The Regional Police Officer,
Kohat Region, Kohat.
3. The District Police Officer,
District, Kohat.
4. The Commandant,
Police Training School,
Hangu.
5. Mr. Muhammad Aman Belt No.646,
Head Constable,
PTC, Hangu (Intermediate Course).
6. Muhammad Shahid
Head Constable # 415, PTC, Hangu (Intermediate Course).
7. Lal Marjan No.444/1155,
Head Constable, PTC, Hangu (Intermediate Course).

8. Muhammad Asif No. 1616,
Head Constable, PTC, Hangu (Intermediate Course).
9. Faiz Ullah IHC, No.1316,
Police Line Kohat.
10. Mr. Faiz Noor Belt No. 4236
Elite Force Police Line Hangu Kohat.
11. Shahid Noor Belt No.1499 CTD
Head Constable,
PS CTD Hangu Road, Kohat.
12. Sheran Gul Belt No.1498 CTD
Head Constable,
PS CTD Hangu Road, Kohat.
13. Aftab Ahmad Belt No.79/KBI
Head Constable,
KBI Unit, Kohat.
14. Amir Muhammad Belt No.698
Head Constable Traffic Wardan, Kohat.
15. Sabeel Muhammad Belt No.537
Head Constable Additional Muharar PS, Jarma, Kohat.
16. Muhammad Bilal Belt No.565
Head Constable through District Police Officer, District Kohat.
17. Zaheen Shah Belt No.1561/EF/36
Head Constable KBI Police Station City, Kohat.
18. Atif Khan Belt No.74
Head Constable Reader DSP P/S City, Kohat.
19. Farhan Shah Belt No.1519/EF 1001/5320/FRP
Head Constable Elite Police Line, Hangu Road, Kohat.
20. Javid Khan Belt No.339
Head Constable Steno DSP Headquarter, Kohat.
21. Ahmad Khan Belt No.36/233

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- Head Constable Naib Court, Additional Session Judge-II,
Kohat.
22. Noor Shoaib Belt No.1222
Head Constable Police Line Kohat.
23. Muhammad Abid Belt No.675
Head Constable Muharrar KBI Unit Old CIA Kohat Cantt:
24. Zaheer Shah Belt No.136
Head Constable CEPEC Police, Police Line, Kohat.
25. Abbas Haider Mir Belt No.535
Head Constable Police Station Lachi, Kohat.
26. Sher Nawaz Belt No.315
Head Constable Incharge High Way Check Post, P/S MRS,
Kohat.
27. Muhammad Kamran Belt No.1328/CTD.
Head Constable CTD Hangu Road, Kohat.
28. Yasir Mehmood Belt No.1058
Head Constable Pall Office, Hangu Road, Kohat.
29. Habib Ullah Shah Belt No.4199/EF
Head Constable Elite Police Line, Hangu Road, Kohat.
30. Danish Rehman Belt No.413.
Head Constable Reader DSP, Police Station, Ghumbat, Kohat.
31. Darvish Khan Belt No.1582/1110/CTD
Head Constable CTD, Hangu Road, Kohat.
32. Muhammad Shabir Belt No.597
Head Constable Muharrar P/S KDA, Kohat.
33. Imam Shah Belt No.591
Head Constable DFC, P/S MRS, Kohat.
34. Menhaj Ud Deen Belt No.358

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Head Constable Police Line Kohat.

35. Arif Mehmood Belt No.1327/CTD
Head Constable CTD, Hangu Road, Kohat.

36. Sami Ullah Belt No.1080
Head Constable Police Line Kohat.

.....Respondents.

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED FINAL SENIORITY LIST OF HEAD CONSTABLES /LHCs ON PROMOTION LIST "C" AS STOOD ON 31-03-2023; COMMUNICATED TO THE APPELLANT THROUGH RTI, KHBYBER PAKHTUNKHA LETTER DATED 24-06-2023, WHEREIN RESPONDENTS NO.5 TO 10 HAS BEEN PLACED SENIOR TO THE APPELLANT IN VOILATION OF RULE 13.8 OF THE POLICE RULE, 1934 AND SELECTION ORDER OF RESPONDENT NO. 5 TO 10 FOR UNDER GOING FOR THE FORTH COMMING INTERMEDIATE COLLEGE COURSE AT PTC, HANGU COMMENCING FROM 07-11-2023 AND AGAINST WHICH APPELLANT FILED DEPARTMENTTAL APPEAL DATED 23-07-2023, WHICH IS STILL PENDING WITH OUT DISPOSAL, HENCE THE STATUTORY PERIOD HAS ELAPSED THEREFORE THE INSTANT SERVICE APPEAL.

PRAYER: