

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT, ABBOTTABAD.

Appeal No. 279/2016

Date of institution ... 09.03.2016
Date of decision 17.04.2019

Muhammad Tanzeem son of Muhammad Maskeen R/O Mera Ban, Bandi Dohndan, Qalandarabad, Abbottabad.

(Appellant)

Versus

Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Peshawar and four others.

(Respondents)

Present

Qazi Muhammad Sheraz,
Advocate

... For appellant.

MR. HAMID FAROOQ DURRANI,

... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of order dated 05.12.2007 issued by respondent No. 5 through which he was discharged from service under Police Rules, 1934 (P.R 12.21). He preferred a departmental appeal which was also rejected on 27.07.2009. A review petition under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 was submitted by the appellant which also could not find favour and was rejected on 08.02.2016, being barred by time.

2. Learned counsel, while arguing the appeal in limine contended that the appellant, after his appointment as constable, was sent for training.

He underwent the training with Khalid Company. He was informed that his training was with Taimur Company in FRP and he should have joined

there. In his view, the absence of appellant from training in a specific Company was due to misconception and was not wilful.

3. The record suggests that the appellant was discharged from service on 15.12.2007 on account of his absence from Police Training Centre w.e.f. 20.09.2007. The appellant was still a recruit constable, therefore, was treated accordingly under the relevant rules. During the proceedings the appellant was issued show cause notice which he did not care to reply. He also did not appear before the competent authority for personal hearing.

4. The departmental appeal of appellant was rejected on 27.7.2009, where-after, he kept mum for a considerable period and then preferred review petition under Rule 11-A of Police Rules, 1975. The said petition was considered in a meeting of Review Board on 31.12.2015, wherein, the appellant was also heard in person. The petition stood rejected on 08.02.2016.

5. In view of the above, when the departmental appeal as well as review petition of the appellant was barred by enormous time, the appeal in hand is without any merit calling for its admission for regular hearing. The same is dismissed in limine. File be consigned to the record room.


(HAMID FAROOQ DURRANI)
Chairman
Camp Court, Abbottabad.

ANNOUNCED
17.04.2019

279/2016

18.12.2018

Appellant in person present.

An application for adjournment has been moved on account of non-availability of learned counsel for the appellant.

It is noticeable that on previous many occasions the case was adjourned upon requests from the appellant side. It is, therefore, adjourned to 20.02.2019 before S.B at camp court, Abbottabad but for the last time.



Chairman
Camp court A/Abad

20.02.2019


Counsel for the appellant present and requested for adjournment. Adjourned to 17.04.2019 for preliminary hearing before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

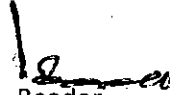
25.05.2018

Appellant in person present and made request for adjournment as his counsel is not available. Adjourned. To come up for preliminary hearing on 31.08.2018 before S.B. at camp court A/Abad.


Member
Camp court A/Abad


31.08.2018

Due to summer vacations, the case is adjourned .To come up for the same on 15.10.2018 at camp court Abbottabad.


Reader


15.10.2018

Appellant in person present. Due to general strike of the Khyber Pakhtunkhwa Bar Council, counsel for the appellant is not in attendance. Adjourned. To come up for preliminary hearing on 18.12.2018 before S.B at camp court, Abbottabad.


Member
Camp Court, A/Abad

20.10.2017

Clerk of counsel for the appellant present. Seeks adjournment as learned counsel for the appellant is not in attendance. To come up for preliminary hearing on 19.10.2018 before S.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad.


19.1.2018

None present for the appellant. Mr. Usman Ghani District Attorney alongwith Shamraiz Khan, H.C for the respondents present. To come up for preliminary hearing on 22.03.2018 at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

22.03.2018

Appellant present in person and Mr. Usman Ghani, District Attorney alongwith Shamraiz Khan, H.C for the respondents present. Appellant submitted application for adjournment as his counsel is not in attendance. Granted. To come up for preliminary hearing on 25.05.2018 before S.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad


25.05.2017

Since tour programme to camp court, Abbottabad for the month of May, 2017. has been cancelled by the Worthy Chairman, therefore, to come up for the same on 21.07.2017 at camp court, Abbottabad. Notices be issued to the parties for the date fixed accordingly


Registrar

21.07.2017

Clerk of counsel for the appellant and Mr. Muhammad Bilal, DDA alongwith Shamraiz Khan, HC for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. To come up for preliminary hearing on 25.08.2017 before S.B. at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

25.08.2017


DDA also present
Junior to counsel for the appellant present. Senior counsel for the appellant is not in attendance. Seeks adjournment. Adjourned. To come up for preliminary hearing on 20.10.2017 before S.B at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

279/16

19.1.2017

Appellant in person and Mr. Muhammad Siddique Sr.GP alongwith Shamraiz Khan. Reader for respondents present. Appellant seeks adjournment as his counsel is not in attendance. Adjourned for preliminary hearing to 16.02.2017 before S.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad


16.02.2017

Clerk of counsel for the appellant and Mr. Shamraiz Khan. Reader alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Due to strike of the Bar, counsel for the appellant is not in attendance. To come up for preliminary hearing on 16.03.2017 before S.B at camp court, Abbottabad.


MEMBER
Camp Court, A/Abad

16.03.2017

Counsel for the appellant and Mr. Shamraiz Khan Reader alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Departmental record submitted. Learned counsel for the appellant requested for adjournment. To come up for preliminary hearing on 18.05.2017 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

لکھنؤ الیٰ حبیب مسعود سے کئی مہینوں کی اجازت اور اس کا کیا

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در اور مسعود اور دیگر لیگ کا تاریخ سے جدا ہے۔
عنوان

حبیب علی کی درخواست دہلی ہے۔

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سب سے کارروائی ہے۔

۲۔ یہ کہ مسعود نے عنوان بنالہ میں اپنا نام لکھ کر دیا ہے اور اس کا نتیجہ
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یہ ہے۔


۱۸/۲/۱۸
اس کا جواب

مگر تنظیم اپنا نام لکھ کر دیا ہے اور اس کا نتیجہ


20.07.2016 Agent of counsel for the appellant present. Seeks adjournment as counsel for the appellant is out of station. To come up for preliminary hearing on 22.09.2016 before S.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad,

22.09.2016 Counsel for the appellant present. Pre-admission notice be issued to the respondents as well as learned Senior Government Pleader for preliminary hearing including arguments on the point of limitation on 24.11.2016 before S.B at camp court. Abbottabad.


Chairman
Camp court, A/Abad





24.11.2016 Appellant present in person and Mr. Shamraiz Khan, Reader alongwith Mst. Bushra Bibi, Government Pleader for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. Adjourned for preliminary hearing to 19.01.2017 before S.B at camp court, Abbottabad.


Chairman
Camp Court. A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 279/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	24.03.2016	<p>The appeal of Mr. Muhammad Tanzeem resubmitted today by Qazi Muhammad Sheeraz Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	26.3.16	<p>This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up thereon <u>20-04-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	20.04.2016	<p>None is present for the appellant. Adjourned for preliminary hearing to 18.05.2016 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp court, A/Abad</p>
	18.5.2016	<p>Clerk of counsel for the appellant present. Seeks adjournment. Adjourned for preliminary hearing to 20.07.2016 at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp court, A/Abad</p>

The appeal of Mr. Muhammad Tanzeem son of Muhammad Maskeen r/o Mera Ban Bandi Dohndan Qalandarabad Abbottabad received to-day i.e. on 09.03.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 2- Copies of order dated 15.12.2007 and 27.7.2009 are illegible which may be replaced by legible/better one.
- 3- Copies of first and second departmental appeal preferred by the appellant before respondent no. 2 & 3 are not attached with the appeal which may be placed on it.
- 4- Appeal may be page marked according to the index.
- 5- Annexures of the appeal may be attested.
- 6- Annexures of the appeal may be flagged.
- 7- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 400 /S.T,

Dt. 10/3 /2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Qazi Muhammad Sheraz Adv. A.Abad.

Respected Sir

- 1- charge sheet, statement of allegation, show cause enquiry report and replies ~~are~~ were not issued to the appellant which may be inquired from Deptt.
- 2- removed
- 3- copies of 1st and 2nd departmental appeal are not mentioned as annexure.
- 4- Removed
- 5- Removed
- 6- Removed
- 7- Removed

24 $\frac{3}{16}$ 2/16


Advocate

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

Service Appeal No. 279/2016

Muhammad Tanzeem S/o Muhammad Maskeen R/o Mera Ban, Bandi Dohndan,
Qalandarabad, Abbottabad.

....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber
Pakhtunkhwa, Peshawar.

....RESPONDENTS

SERVICE APPEAL

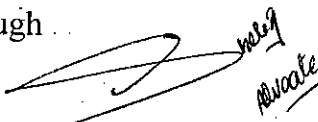
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S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 8	
2.	Copy of order dated 15/12/2007	9 to 10	"A"
3.	Copy of order dated 27/07/2009	11 to 12	"B"
4.	Copy of Order dated 08/02/2016	13	"C"
5.	Copy of application	14	"D"
6.	Wakalatnama	15	

....APPELLANT

Dated: _____/2016

Through



(QAZI MUHAMMAD SHERAZ)
Advocate High Court, Abbottabad

1

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

Service Appeal No. 279 /2016

Muhammad Tanzeem S/o Muhammad Maskeen R/o Mera Ban, Bandi Dohndan,
Qalandarabad, Abbottabad.

....APPELLANT

VERSUS

A.W.F. Province
Service Tribunal
Diary No. 195
Dated 09-3-2016

1. Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber Pakhtunkhwa, Peshawar.
2. IGP, Khyber Pakhtunkhwa, Peshawar.
3. Commandant FRP Khyber Pakhtunkhwa Peshawar.
4. Regional Police Officer, Hazara Range.
5. District Police Officer, Abbottabad.

....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT 1974, FOR
DECLARATION TO THE EFFECT THAT HE
IMPUGNED REMOVAL FROM SERVICE ORDER NO.
OB No. 520 DATED 15/12/2007 IS ILLEGAL,

~~Filed to day~~
Registrar
9/3/2016.

re-submitted to day
and filed.

Registrar
24/3/16

AGAINST THE LAW AND LIABLE TO BE SET
ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT
APPEAL, IMPUGNED REMOVAL FROM SERVICE
ORDER OB No. 520 DATED 15/12/2007 ISSUED BY
RESPONDENT NO. 5 MAY GRACIOUSLY BE SET
ASIDE AND RESPONDENTS MAY BE DIRECTED
TO REINSTATE THE APPELLANT FROM THE
DATE OF REMOVAL FROM SERVICE WITH ALL
SERVICE BACK BENEFITS IN TERMS OF PAY
ETC.

Respectfully Sheweth: -

Following are the facts, giving rise to the instant appeal;-

1. That the appellant was appointed as constable and allotted as No. 1482.
2. That after getting training for 4 month at Bloch center in Khalid Company it has been informed to appellant that "You where transferred FRP 3

months backs you should join training with FRP in Taimour Company.

3. That the appellant joined Taimour company where punishment was awarded in the shape of extra drill due to absence, as appellant replied that it have not been informed to the appellant in time that the transferred was made further more appellant was not absent but remained in Khalid Company while getting training regularly.
4. That DPO Abbottabad vide order No. 520 dated 15/12/2007 have discharge appellant from services. (Copy of order dated 15/12/2007 is annexed as Annexure "A").
5. That the appellant filed appeal to Commandant FRP KPK in time which was rejected vide order No. 5712-14/EC dated 27/07/2009. (Copy of order dated 27/07/2009 is annexed as Annexure "B").
6. That by aggrieved from above mentioned order appellant filed departmental appeal to respondent NO. 1 which was rejected vide order 1028-36/16 dated 08/02/2016. Copy of order is attached herewith. (Copy of Order dated 08/02/2016 is Annexed as annexure "C").

7. That the petitioner have applied for attested copies of charge sheet, statement of allegations, enquiry repeats and replies to respondents but copy was not furnished hence present appeal is filed without aforementioned record. Copy of application is Annexed as Annexure "D".
8. That the order 1028-36/16 dated 08/02/2016 is illegal, void discriminatory against the natural justice and without lawful justification and liable to be set aside Hence the instant appeal is filed, inter-alia, on the following grounds;-

GROUND:-

- a. That impugned removal from service order of the appellant issued by respondent No. 5 is perverse, illegal, against the law, without observing codal formalities which were sine qua non prior to taking penal action against the appellant.
- b. That, in this regard, no inquiry about the appellants getting training in Khalid Company has not been conducted hence appellant have been condemned un heard.
- c. That the allegations of absence have not been proved by the respondents through any evidence.

d. That the appellant have been recruited in district police and after that petitioner regularly got training as a constable of district police no notice have been issued to the appellant that he have been transferred to the FRP which is basic obligation on the respondent to informed appellant in time. But they have not fulfilled their obligation, whereas appellant regularly remained in Khalid Company as trainee of District Police. When appellant have been informed that transferred have been made appellant joined Taimour Company so appellant fulfilled the obligation in this regard record is being maintained about the trainees which is in the possession of respondent but they malafidly do not present it.

e. That the respondent did not recorded the statement of the training instructors of both companies and neither examine the record of attendance which is necessary in present case so whole proceeding against the appellant could be declared void only because of this reason.

- f. That the no show cause notice/opportunities of personal hearing have not been provided by respondent departments to the appellant. Hence, removal from service order dated 15/12/2007 is liable to be set aside.
- g. That the appellant become a shuttle coc between FRP and District Police, Hence forum for appeal and application become confusing and efforts where made by the respondents to knock out the appellant on technicalities.
- h. That respondent No. 5 did not pass order of removal from service of the appellant with judicious mind but issued on the instance of the accused and his allies.
- i. That the appeal of the appellant is within time and this Honourable Tribunal has jurisdiction to entertain the instant appeal.

So here to state have issued 18

delegation, distinct, every 2018 and 10 Respondent 10 (10/10/18)
upto all financial - home point to 10 without financial record (10/10/18)

It is, therefore, humbly prayed that on acceptance of the instant appeal, impugned removal from service order OB No. 520 dated 15/12/2007 issued by respondent No. 4 may graciously be set aside and respondents may be directed to reinstate the appellant from the date of removal from service with all service back benefits in terms of pay etc.

M. Tanzeem
...APPELLANT

Dated: _____/2016

Through

(Signature)

(QAZI MUHAMMAD SHERAZ)
Advocate High Court, Abbottabad

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

M. Tanzeem
...APPELLANT

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

Service Appeal No. _____/2016

Muhammad Tanzeem S/o Muhammad Maskeen R/o Mera Ban, Bandi Dohndan,
Qalandarabad, Abbottabad.

....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber
Pakhtunkhwa, Peshawar.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Muhammad Tanzeem S/o Muhammad Maskeen R/o Mera Ban,
Bandi Dohndan, Qalandarabad, Abbottabad, do hereby solemnly affirm and
declare that the contents of forgoing appeal are true and correct to the best
of my knowledge and belief and nothing has been concealed therein from
this Honourable Court.

M. Tanzeem

DEPONENT



Annex
"A"

9

ORDER

Upon the absence report submitted by Commandant RTW Hazara vide his Endst. No 642-47 dated 02-11-07 for absence of recruit Constable Muhammad Tanzeem No 1482 from Police Training Centre w/e from 20-09-07 to till date, proper Show Cause Notice was served upon the defaulter. He was asked to submit his explanation within 7 days and given liberty to be heard in person. Neither reply of Show Cause Notice was received nor he bothered to appear before the undersigned for personal hearing. He is therefore, discharged from service under PR 12-21 with immediate effect. During the period he remained absence from 20-09-07 to date is treated as leave without pay.

Order announced


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Abbottabad

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Provincial Police Officer, NWFP, Peshawar
Commandant FRP, NWFP, Peshawar
Deputy Inspector General of Police, Hazara Region, Abbottabad
Commandant RTW, Hazara, Abbottabad with reference to his office
No 642-47 dated 12-11-07 please
Superintendent of Police, FRP, Hazara


Abbottabad

O.B./O.S./S.R.C.
For info

S.P./F.P.

09-1-08



ORDER

Upon the absence report submitted by Commandant RTW Hazara vide his Endst: No. 642-47 dated 02/11/07 fir absence of recruit Constabvle Muhammad Tanzeem No. 1482 from Police Training Center w.e. from 20/09/07 to till date, proper show Cause Notice was served upon the defaulter. He was asked to submit his explanation whithin 7 days and given liberty to be heard in person. Neither reply of Show Cause Notice was received nor he bothered to appear before the undersigned for personal hearing. He is therefore, discharged from service under PR 12-21 with immediate effect. During the period he remained absence from 20/09/07 to date is treated as leave without pay.

Order armouneed


**District Police Officer,
Abbottabad.**

NO. 13769-73 dated 15/12/07

Copy of above is forwarded for f/o information to the;-

1. Provincial Police Officer, NWFP, Peshawar.
2. Commandant FRP NWFP, Peshawar.
3. Deputy Inspector General of Police, Hazara Region Abbottabad.
4. Commandant RTW Hazara, Abbottabad with reference to his office No. 642-47 dated 12/11/07 please.
5. Superintendent Police, FRP, Hazara.

**District Police Officer,
Abbottabad**

ATTESTED


ORDER

This order shall dispose of the appeal of Ex-Constable Muhammad Tanzeem No. 1482/5409 of FRP Hazara Range

Brief facts of the case are that while he was deputed to Baluch Regiment Center Abbottabad for basic recruit course on 20.09.2007, he absented himself from training program for a period of 85 days without any leave or prior permission of the competent authority. He was issued Charge Sheet/statement of allegation and DSP FRP Hazara Range was appointed as enquiry officer. After fulfilling all the codal formalities he was discharged from the service by DPO Abbottabad vide his office OB No.520 dated 15.12.2007 and 4 dated 21.08.

However, from the perusal of record and findings of Enquiry Officer, there are no cogent reasons to interfere in the order of DPO Abbottabad. Therefore his appeal is rejected and the papers are consigned to the office concerned.

[Handwritten Signature]

COMMANDANT
FRONTIER RESERVE POLICE
NWFP PESHAWAR

No. 5713-14 /EC dated Peshawar the 27/07/09

Copy of above is sent for information and u/a to:-

Superintendent of Police FRP Hazara Range w/r to his Memo No.861/OSI dated 9.7.09 dated 8.5.09. His service roll and F.I.I. miss. are returned herewith for record in your office.

2.

Ex constable Muhammad Tanzeem No. 1482/5409 S/o Muhammad Miskeen R/o Village Maira Ban Bandi P/S Mirpur Tehsil & Distt Abbottabad

SP/FRP

09 - 08

ATTESTED

[Handwritten Signature]

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C.G.

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ORDER

This order shall dispose off the appeal of Ex-Constable Muhammad Tanzeem No. 1482/5409 of FRP Hazara Range.

Brief facts of the case are that while he was deputed to Baluch Regiment Center Abbottabad for basic recruit course on 20/09/2007, he absented himself from training program for a period of 85 days without any leave or prior permission of the competent authority. He was issued Charge Sheet/statement of allegation and DSP FRP Hazara Range was appointed as enquiry officer. After fulfilling all the codal formalities he was discharged from the service by DPO Abbottabad vide his office OB NO. 520 dated 15/12/2007 and 4 dated 02/01/2008.

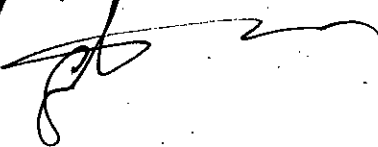
However, from the perusal of record and findings of Enquiry Officer, there are no cogent reason to interfere in the order of DPO Abbottabad. Therefore his appeal is rejected and the papers are consigned to the office concerned.

**COMMANDANT
FRONTIER RESERVE POLICE
NWFP PESHAWAR**

No. 5713-14 /EC dated Peshawar the 27/07/09.

Copy of above is sent for information and n/a to:-

1. Superintendent of Police FRP Hazara Range w/r to his Memo: No. 861/OSI dated 09/07/2009 dated 08/05/2009. His service roll and f _____ returned herewith for record in your office.
2. Ex constable Muhammad Tanzeem NO. 1482/5409 S/o Muhammad Miskeen R/o Village Maira Ban Bandi P/S Mirpur Tehsil and District Abbottabad.

ATTESTED


گورنمنٹ آف پنجاب سرورس ڈیپارٹمنٹ جی ۱۱۱۱۱۱۱۱۱۱۱۱

سرکار پنجاب حکومت

22/3/18

درخواست غلام محمد علی صاحبی
درخواست غلام محمد علی

غلام محمد علی - درخواست غلام محمد علی

۱) غلام محمد علی صاحبی غلام محمد علی صاحبی صاحبی
سماں صاحبی - جسکی درخواست غلام محمد علی صاحبی
صاحبی

۲) غلام محمد علی صاحبی غلام محمد علی صاحبی صاحبی
صاحبی

غلام محمد علی صاحبی غلام محمد علی صاحبی صاحبی
صاحبی

غلام محمد علی

RR/3/118

۲۲/۳/۱۸

سرکار پنجاب حکومت





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OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

No. S/ 1027 /16, Dated Peshawar the 08/02/2016

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by **Ex-Constable Muhammad Tanzeem No. 1482**. The appellant was awarded punishment of Discharge from Service by DPO/Abbottabad vide OB No.520, dated 15.12.2007, on the charges of absence for a period of 02 months and 25 days.

His appeal was rejected by Commandant, FRP, Khyber Pakhtunkhwa vide order No. 5713-14/EC, dated 27.07.2009.

Meeting of Review Petition Board was held on 31.12.2015, wherein appellant was heard in person. Scrutiny of record revealed that his service was less than 01 year and he did not qualify recruit course. His appeal was badly time barred. Thus the same was rejected on grounds of limitation and merit as well.

This order is issued with the approval by the Competent Authority.

Najeeb
(NAJEEB-UR-RAHMAN BUGVI)
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. S/ 1028-36/16, Dated Peshawar, the 08.02/2016.

Copy of the above is forwarded to the:

1. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
2. District Police Officer, Abbottabad.
3. Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
4. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
5. PRO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
6. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
8. Office Supdt: E-IV, CPO Peshawar.
9. Central Registry, CPO.

ATTESTED

[Signature]

کتابت صحیفہ FRP ل S.S.P اس 2103

درخواست پر ہر دو حوالہ فرمائے گا Documents میں سے
کہ تنظیم و لاہور کے سیکشن 5409 کے تحت
بائری ڈیوٹی کارڈ - ملنگ 2103

صاف علیٰ
صاف علیٰ میں شاکر کے ساتھ Show cause
تو وہ چارز شرط کی ہوئی ہے اور ساتھ ساتھ
Statement of allegation میں جو کہ وہ کارڈوں
و میں شاکر کے ساتھ ہے۔

یہ مذکورہ Documents کی فیکوگیاں
Original سے مناسب ہو میں شاکر کے ساتھ ملنگ
تو میں شاکر کے ساتھ سے شاکر کے ساتھ
اور Documents وہاں میں شاکر کے ساتھ سے شاکر کے ساتھ

16/3/2018

OS/1582


تعمیر تنظیم و لاہور کے سیکشن 5409
جن میں شاکر کے ساتھ سے شاکر کے ساتھ
13101-8100070-3
SSP/MLP 16/3/18
PTO

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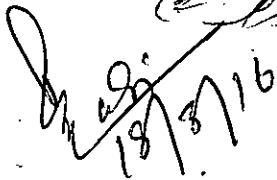
Sir,

According to this office, his service record was sent to worthy Commandant FRP K.P.K. Peshawar on 23.6.2015 vide this office memo 986/SRE/FRP dated 23.6.15 for appeal in re-Appointment in Service please.

30/10


18-03-16.

وہ کی طرف سے سروس ریکارڈ، پشاور
فرپ کے پاس 23.6.15ء کو بھیجا گیا ہے


18/3/16

وکالت نامہ

کورٹ فیس

بعدالت سروسٹریٹ ایڈووکیٹس KPLK سٹور

عنوان: محمد تنظیم بنام اسٹیٹ ٹریڈنگ کمپنی (پرائیویٹ) لمیٹڈ

منجانب: اسٹیل

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلاف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کرو یا تاکہ سندر ہے۔

المرقوم:

مقام: _____

م: Tom Zeebar
 13/01-8/00070-3
