

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 551/2019

Date of Institution ... 30.04.2019

Date of Decision ... 11.07.2019

Ashraf Ali son of Rehmat Ali R/O Tappee Koroon, Tehsil and District Karak Ex-Constable No.821, District Police, District Karak. ... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Home Peshawar and others. ... (Respondents)

Mr. Naqibullah Khattak,
Advocate.

... For appellant

MR. HAMID FAROOQ DURRANI,

... CHAIRMAN

JUDGMENTHAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of order dated 23.06.2008 passed by respondent No. 4/District Police Officer Karak, whereby he was discharged from service under Rule 12.21 of the Police Rules, 1934. He is also dissatisfied with the order of rejection of his departmental appeal by Regional Police Officer Kohat Region/respondent No. 3 on 27.07.2017 as well as revision petition under Rule 11-A of Police Rules, 1975 by respondent No. 1/Provincial Police Officer Khyber Pakhtunkhwa Peshawar dated 15.03.2019, respectively.
2. I have heard learned counsel for the appellant and have gone through the available record.
3. The record suggests that the appellant was appointed and enlisted as Constable on 27.07.2007. On account of absence without sanction or leave from 06.05.2008 to 09.05.2008, he was proceeded against and was discharged from service. Pertinently and admittedly, the appellant was still on probation when was



proceeded against. He firstly submitted representation against the order of discharge on 24.06.2017 which was rejected on 28.07.2017 also being barred by nine years. A revision petition was preferred under Rule 11-A of the rules ibid on 08.02.2019 which met the same fate and was rejected on 15.03.2019, being badly time barred.

4. As provided by the relevant rules the appellant was obligated to submit a departmental appeal against the order, adversely passed against him on 23.06.2008, within 30 days. Instead, the appeal was preferred after enormous delay of nine years. Similarly, for submission of revision petition to the Provincial Police Officer, Khyber Pakhtunkhwa a period of thirty days is provided in the rules ibid. On the other hand, the same was brought after more than one and half years.

Alongwith the instant appeal an application for condonation of delay has been submitted. Illness of mother of appellant and her prolonged treatment has been mentioned as the sole ground for delay on the part of the appellant. The said ground, however, does not specify any date of alleged absence or demise of his mother. Needless to note that the delay of each day has to be accounted for while attempting to have it condoned.

5. In view of the above, the appeal in hand is without any merit warranting its admission for regular hearing. It is, therefore, dismissed in limine. File be consigned to the record room.





(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
11.07.2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 551/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/04/2019	<p>The appeal of Mr. Ashraf Ali presented today by Mr. Naqibullah Khattak 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 30/4/19</p>
2-	02/05/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/06/19</u></p>
	12.06.2019	<p>Mr. Roshan Khan, Advocate  alongwith appellant present.</p> <p>Requests for adjournment as learned senior counsel for the appellant is engaged before the Honourable High Court today.</p> <p>Adjourned to 11.07.2019 before the S.B:</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL, PESHAWAR

Appeal No. 551/2019

With Civil Miscellaneous Application

Ashraf Ali

VERSUS

Government of KPK through Secretary Home Peshawar &
Others

INDEX

S#	Description of Documents	Annexure	Page No's
1	Memo of Appeal		1-5
2	Affidavit		6
3	Address of Parties		7
4	Application for Condonation of Delay(if any) alongwith Affidavit		8-10
5	Photocopies of SSC & Appointment letter and Domicile Certificate	"A", "B" & "C"	11 to 13
6	Copy of Discharge from Service dated 23/06/2008	"D"	14
7	Copy of Departmental appeal and its rejection	"E" & "F"	15-16-17
8.	Photocopy of the Revision Petition dated 08/02/2019 and its rejection dated 15/03/201	"G" & "H"	18-19
7	Wakalat Nama	-	20

Appellant ^{محمد علی}
Ashraf Ali Ex-Constable

Through

29

Naqibullah Khattak
Advocate, High Court,
Peshawar.

Dated: 29/04/2019

4
2019

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

Service Appeal No. 557 /2019

With Civil Miscellaneous Application No /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 676

Dated 30/4/19

Ashraf Ali S/o Rehmat Ali R/o Tappee Koroona, Tehsil &
District Karak Ex- Constable No: 821, District Police, District
Karak.

Appellant

VERSUS

1. Government of KPK through Secretary Home Peshawar.
2. Provincial Police Officer (IGP) KPK Peshawar.
3. Regional Police Officer (DIG) Kohat Region, Kohat.
4. District Police Officer Karak.

Respondents

**SERVICE APPEAL U/S 4 OF SERVICE TRIBUNAL
ACT 1974 AGAINST THE ORDER NO: CG-83
DATED 23/06/2008 PASSED BY THE DISTRICT
POLICE OFFICER KARAK AND THE
DEPARTMENTAL APPEAL DATED 24/06/2017
BEFORE RESPONDENT NO.3 DISMISSED ON
27/07/2017 WHILE REVISION PEITION DATED
08/02/2019 BEFORE RESPONDENT NO.2 MET
WITH THE SAME FATE ON 15/03/2019
RECEIVED BY THE APPELLANT ON 04/04/2019.**

Filed to-day
Registrar
30/4/19

PRAYER IN SERVICE APPEAL

**ON ACCEPTANCE OF THE INSTANT SERVICE
APPEAL, THE ORDERS DATED 23/06/2008 OF
DISTRICT POLICE OFFICER KARAK, ORDER**

DATED 27/07/2017 OF RESPONDENT NO.3 AND ORDER DATED 15/03/2019 RECEIVED ON 04/04/2019 OF RESPONDENT NO.2 BEING ILLEGAL MAY GRACIOUSLY BE SET ASIDE AND THE APPELLANT REINSTATED IN SERVICE AS CONSTABLE FROM 23/06/2008 WITH ALL BENEFIT OF SERVICE AND PAY.

Respectfully Sheweth:

Facts in brevity followed by grounds giving rise to the instant service appeal are submitted hereunder:-

1. That on getting through Secondary School Certificate Examination from Board of Intermediate & Secondary Education Kohat Session 1996 (supplementary), the appellant was selected as Police Constable in the Respondents Department and on completion of Police Training was appointed as Constable No. 821 in Karak Police by District Police Officer Karak on 27/07/2007 (Photocopies of SSC & Appointment letter and Domicile Certificate are enclosed herewith as Annexure A, B and C respectively).
2. That unluckily appellant's mother suffered from fatal disease and the appellant was morally bound to look after her and applied for 2 months leave which was not granted

but instead, departmental proceedings were initiated against the appellant without associating the appellant which ended in his discharge from service on 23/06/2008. (Copy of Discharge from Service dated 23/06/2008 is annexure "D").

3. That against the aforesaid order dated 23/06/2008, an appeal dated 24/06/2017 was preferred to Respondent No.3 which departmental appeal was turned down on 27/07/2017. (Copy of Departmental appeal and its rejection are enclosed herewith as Annexure "E" & "F" respectively).
4. That being disappointed with the aforementioned rejection order, the same was challenged in Revision Petition dated 08/02/2019 before the Respondent No.2 which was too met with the same fate on 15/03/2019 conveyed to the appellant on 04/04/2019. (Photocopy of the Revision Petition dated 08/02/2019 and its rejection dated 15/03/2019 are enclosed herewith as Annexure "G" & "H" respectively).
5. That aggrieved from the aforementioned orders of Respondents, the same are assailed before this Hon'ble Tribunal on the following grounds inter-alia:-

GROUND:

- A. That no charge sheet, summary of allegations, charge sheet and no show cause notice and no regular inquiry was conducted by the Respondents as malafidely shown in appellant discharge from service.
- B. That before imposing major penalty of Discharge from Service, conducting of regular inquiry is the lawful requirement and facts finding inquiry is not to be a base in imposing major penalty of discharge from service as the case of the appellant.
- C. That reasonable grounds for disallowing leave application of appellant were never taken into consideration by the Respondents which caused gross miscarriage of justice to the appellant.
- D. That the appellant became overage and cannot join any other government service.
- E. That appellant was discharged from service simply on absence from duty and his leave application was not considered sympathetically and except absence, there is

no other ground in discharge of the service of the appellant.

F. That dismissal order of appellant from service is whimsical, fanciful and without jurisdiction, hence liable to be set aside.

G. That other grounds would be raised by the appellant during full arguments on the instant service appeal with the approval of this Hon'ble Court.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, the orders of the Respondents being illegal may graciously be set aside and the appellant reinstated in service as Constable with all back benefits of pay+ service to meet the ends of justice.

Through

Appellant ^{اشرف علی} CNIC 14202-0891478-9

Ashraf Ali Ex-Constable



Naqibullah Khattak

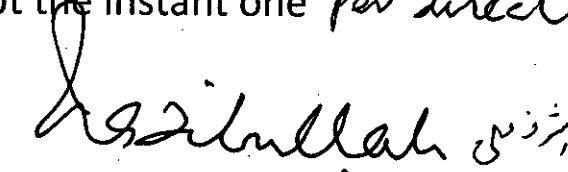
Advocate, High Court,

Peshawar.

Dated: 25/04/2019

Note:

No such like service appeal has ever been filed before this Hon'ble Court except the instant one *per directions of my client*


Advocate Peshawar

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

Service Appeal No. _____/2019

With Civil Miscellaneous Application No ___/2019

Ashraf Ali

VERSUS

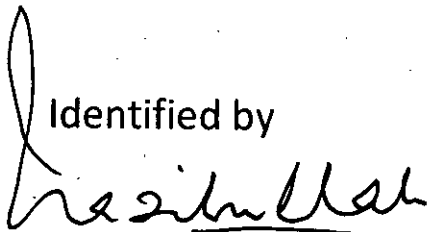
Government of KPK through Secretary Home Peshawar &
Others

AFFIDAVIT

I, Ashraf Ali S/o Rehmat Ali R/o Tappee Koroon, Ex-Constable No: 821, District Police, District Karak, do hereby solemnly affirm and declare on oath that all contents of instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

اشرف علی
DEPONENT

CNIC: 14202-0891478-9

Identified by

Naqibullah Khattak
Advocate, High Court,
Peshawar.



29-04-19

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

Service Appeal No. _____/2019

With Civil Miscellaneous Application No ___/2019

Ashraf Ali

VERSUS

Government of KPK through Secretary Home Peshawar &
Others

ADDRESSES OF PARTIES

PETITIONER

Ashraf Ali S/o Rehmat Ali R/o Tappee Koroona, Ex-
Constable No: 821, District Police, District Karak.

RESPONDENTS

1. Government of KPK through Secretary Home Peshawar.
2. Provincial Police Officer (IGP) KPK.
3. Regional Police Officer (DIG) Kohat Region Kohat.
4. District Police Officer Karak.
5. Dated: 29/04/2019

Appellant
Ashraf Ali Ex-Constable
Through *Naqibullah*
Naqibullah Khattak
Advocate, High Court,
Peshawar.
29/04/2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL, PESHAWAR

Appeal No. _____/2019

With Civil Miscellaneous Application

Ashraf Ali

VERSUS

Government of KPK through Secretary Home Peshawar &
Others

**APPLICATION ON BEHALF OF APPELLANT/
PETITIONER U/S 5 OF LIMITATION ACT 1908, FOR
CONDONATION OF DELAY (IF ANY) IN FILING THE
ACCOMPANYING SERVICE APPEAL**

Respectfully Sheweth:

- A. That the appellant's mother was seriously ill and on her prolong treatment, she lastly met with death, hence appellant absence from duty.
- B. That after her death, the appellant made serious struggle for his reinstatement in service but all in vain.
- C. That no limitation runs after void order.

D. That being disappointed, with his private efforts, the appellant filed departmental appeal before Respondent No.3 on 24/06/2017 and Revision Petition before Respondent No.2 on 09/02/2019 which was dismissed on 15/03/2019 received on 04/04/2019.

It is, therefore, humbly stated that the limitation may kindly be condoned in filing the accompanied service appeal.

اشرف علی - CNIC 142020891478-9

Appellant
Ashraf Ali Ex-Constable

Through

Naqibullah

Naqibullah Khattak
Advocate, High Court,
Peshawar.

29/04/2019

Dated: 29/04/2019

10

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Appeal No. _____/2019

With Civil Miscellaneous Application

Ashraf Ali

VERSUS

Government of KPK through Secretary Home Peshawar &
Others

AFFIDAVIT

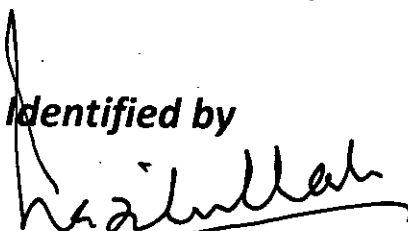
I, Ashraf Ali S/o Rehmat Ali R/o Tappee Koroona,
Tehsil & District Karak Ex- Constable No: 821, District
Police, District Karak, do hereby solemnly affirm and state
on oath that all contents of applications are true and
correct to the best of my knowledge and belief and
nothing has been concealed from this Hon'ble Court.

اشرف علی

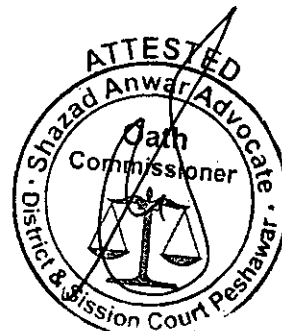
DEPONENT

CNIC: 14202-0891478-9

Identified by


Naqibullah Khattak
Advocate, High Court,
Peshawar

29/4/2019



29.04.19

Annexure A (11)

S.No. KB 73372

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 6123

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT

(N.W.F.P. Pakistan)

Secondary School Certificate Examination
SESSION 2006 (Supply)

THIS IS TO CERTIFY THAT ASHRAF ALI KHAN

Son/Daughter of REHMAT ALI KHAN and a
Student of DISTRICT KARAK has passed

the *Secondary School Certificate Examination* of the Board of Intermediate and
Secondary Education, Kohat held in NOVEMBER, 2006 as a PRIVATE
candidate. He/She obtained 513 Marks out of 1050 and has been placed in
Grade D. Representing Fair

The Candidate passed in the following subjects:

English	2.	Urdu	3.	Islamiyat	4.	Pak. Studies
Mathematics	6.	PHYSICS	7.	CHEMISTRY	8.	BIOLOGY

Date of birth according to admission form is 18-Jan-1989

Asstt. Secretary

Attested
Asstt. Secy
Advt. PSA

Secretary

This Certificate is issued without alteration or erasure.

Annexure B (12)

Recruitment Session, July-2007
Position in Merit list: Sl: No. 87

ORDER.

Mr. Ashraf Ali S/O Rehmat Ali r/o tapi Algadi Karak, Tehsil & District Karak, having Height, 5'-8 ½", Chest 33"x35", Education 10th, Date of birth 18.01.1989, is hereby enlisted as Constable, BPS-5 (2415-115-5865) with effect from 27.07.2007 in this District Police. He is medically fit and also verified to be of good Character by the local Police. His service is liable to be terminated within 14 days notice with out assigning any reason.

He is allotted constabulary No.821.

OB. No. 702
Dated 27-07 /2007


(MUBARAK ZEB)
District Police Officer, Karak.

Attested
Hasimullah
Advocate PSR

DOMICILE CERTIFICATE

I declare that I am born of parents who are permanently Domiciled in N.W.F.P and having been born in this province.



Iss. Ashraf Ali S/O, D/O, W/O Rahmat Ali

born at Distt: Karak Tehsil Karak

Locality/Mohallah Ta. P. Ly. Algadi Karak Caste Khattak

Handwritten signature of Ashraf Ali

Dated: 09/02/2007

Sign: (Signature)

In pursuance to the above declaration Dated 09/02/2007 filed by Ashraf Ali

has been satisfied through verification that the said is born of parents who are permanent resident of Distt: Karak

Tehsil Karak NWFP and having been born within it.

It is hereby certified according that the above declaration is true.



Day 10th Month 02 Year 2007

No: 973 Date 13-2-07

Deputy Distt. Officer Revenue & Estate

Amrullah 13

مشاقق رشک رحمن کرک

جناب عالی!

تصدیق کی جاتی ہے کہ مسی امساکہ اشرف خانی ولد ادختر ازہرہ رہبر علی
ساکن محلہ اگاؤں اشہر تبی اللہ کرکی تحصیل کرکی ضلع کرکی
صوبہ مصرحد کا ایک پیدائشی اور مستقل رہائشی باشندگان ہیں۔ اور میں ذاتی طور پر جانتا ہوں کہ اس کے والدین اشوہر بھی علاقہ مذکورہ کے پیدائشی اور مستقل
پیدائشی باشندگان ہیں اور یہ کہ اچھے شہری ہیں۔

(3A)

Wali Mar Khan
G. Councillor
UGC South Karak

تصدیق کنندہ کا نام ولید خان عہدہ حیثیت چراغی خان
پتہ دستخط، مہر اور تاریخ

جناب عالی!

سب تصدیق از رپورٹ عرض ہیں کہ مسی امساکہ بمعہ والدین موضع
تحصیل کرکی ضلع کرکی کا ایک پیدائشی اور مستقل رہائشی باشندگان ہیں۔
تصدیق کنندہ کا نام عہدہ حیثیت
پتہ دستخط، مہر اور تاریخ

Aversura 2, (14)

By this Order of today will dispose of departmental proceedings initiated against Constable Ashraf Ali, No. 821 on the score of allegation that he absented himself from his lawful duty with effect from 05.05.2008 till date. His Pay was stopped to this effect, vide O.B. No. 576, dated 09.05.2008.

The above named Constable was charge sheeted and Dy. Supdt. of Police, Banda Daud Shah was appointed as enquiry officer to proceed him against departmentally. The Enquiry Officer has submitted his finding/report placed on file.

He was issued with Final Show Cause Notice. His reply to the Final Show Cause Notice was not satisfactory.

There are no prospect of his becoming a good Police Officer. He is still absent. There are no chance that he will mind his way. Therefore, he is "DISCHARGED" from the service under Police Rule, 12-3 from the date of his absence.

CB.No. 831
Dated. 23/06/2008.

District Police Officer,
Karak.
32/6/08

Copy to all concerned

*Attested
by
Subordinate
Signature*

32/6/08

32/6/08

Handwritten notes and signatures at the bottom of the page, including a large signature and several smaller ones with circled numbers (1) through (4).

To:- The Deputy Inspector General of Police,
Kohat Region, Kohat

Subject:- REPRESENTATION.

Respected Sir,

With due respect and humble submission appellant submits representation against the order of District Police Officer Karak bearing OB No. 831 dated 23.06.2008 vide which appellant was discharge from service.

FACTS:-

1. That appellant was enlisted in Police department district Karak as constable in the year 2007.
2. That in the year 2008 the appellant mother suffered from chronic disease and was unable to join the duties. The authority discharged the appellant from service due to absence from duty without observing the legal and procedural formalities.
3. That the illness of my mother did not allow me to join duty in time.
4. That the alleged disappearance of appellant from duties was not willful and deliberate but inevitable as applicant was unable to avoid look after the ailing mother.
5. That appellant visited Police Lines Karak for joining duty but was shocked to know that appellant has been discharged from service vide impugned order. Hence this appeal on the following grounds.

GROUND:-

- a. That the absence of appellant was not willful and deliberate, actually the ailing mother did not allow appellant to join duty. My mother later on died natural death. Therefore, appellant has wrongly been discharged from service on charges of absence from duty.
- b. That the entire departmental proceedings initiated against appellant were carried out at the back of appellant. Appellant was managing treatment of the ailing mother and such facts have not been brought on record for taking into account while passing the impugned order.
- c. That no evidence was brought on file in support of the charges leveled against appellant and the impugned order was based on ex-parte proceedings, therefore, the impugned order is not sustainable.
- d. That the lower authority has discharged the appellant from the date of absence which is against the law and rules.

*Attested
M. S. Shabbir
Asst. PSR*

Ashraf Ali

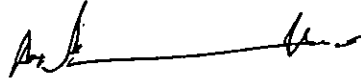
16

That appellant belongs to poor family and have spent sufficient amount on the treatment of mother.

That appellant can do without expressing an English proverb that "man is to sin and God is to forgive."

It is therefore, requested that the impugned order may be aside and appellant may be reinstated in service with back benefits.

Yours sincerely



Ashraf Ali
Ex-constable No. 821
District Karak
Cell No. 03329664743

Date 24-6-2017

Attested
Muhammad
Advocate Peshawar

Amneshi F.

(17)

309
1-8-20

ORDER.

This order is passed on departmental appeal, moved by Ex-Constable Ashraf Ali Khan of Karak district Police against the punishment order passed by DPO Karak vide OB No. 832, dated 23.06.2008, whereby he was awarded major punishment of discharge from service for the allegations of prolong absence of 47-days without any leave or prior permission.

He preferred appeal to the undersigned, upon which relevant record was perused.

I have gone through the available record and come to the conclusion that the allegations leveled against the appellant are proved and the punishment order passed by DPO Karak is correct. Hence, his appeal being devoid of merits and badly time-barred about more than 09-years is hereby rejected.

Order Announced
27.07.2017

Awal Khan

(AWAL KHAN)
Regional Police Officer,
Kohat Region

No. 6806

REC. dated Kohat the 27/07 2017

Copy to the District Police Officer, Karak for information and inform the appellant concerned.

*Attested
Iqbalullah
Advocate BR*

Awal Khan

(AWAL KHAN)
Regional Police Officer,
Kohat Region

*SRC
For M.T.A.*

Amneshi F.
District Police Office
Karak

Appellate No. 18

To:- The Inspector General of Police,
Khyber Pakhtunkhwa Peshawar

Subject:- DEPARTMENTAL APPEAL UNDER RULE 11-A OF POLICE RULE
1975 (AMENDED 2014).

Respected Sir,

With due respect and humble submission appellant submits representation against the order of District Police Officer Karak bearing OB No. 831 dated 23.06.2008 vide which appellant was discharge from service and order of Deputy Inspector General of Police Kohat Region Kohat vide which the departmental appeal of appellant was rejected.

FACTS:-

1. That appellant was enlisted in Police department district Karak as constable in the year 2007.
2. That in the year 2008 the appellant mother suffered from chronic disease and was unable to join the duties. The authority discharged the appellant from service due to absence from duty without observing the legal and procedural formalities.
3. That the illness of my mother did not allow me to join duty in time. Relevant Medical Certificate and Death Certificate are enclosed.
4. That the alleged disappearance of appellant from duties was not willful and deliberate but inevitable as applicant was unable to avoid look after the ailing mother.
5. That appellant visited Police Lines Karak for joining duty but was shocked to know that appellant has been discharged from service vide impugned order.
6. That appellant submitted departmental appeal before Regional Police Officer, Kohat which was rejected vide order dated 27.07.2017. Hence this departmental appeal on the following grounds.

GROUND:-

a. That the absence of appellant was not willful and deliberate, actually the ailing mother did not allow appellant to join duty. My mother later on died natural death. Therefore, appellant has wrongly been discharged from service on charges of absence from duty.

b. That the entire departmental proceedings initiated against appellant were carried out at the back of appellant. Appellant was managing treatment

Attested
Nasir Khan
Adv. for

Amneruni's (19)

of the ailing mother and such facts have not been brought on record for taking into account while passing the impugned order.

- c. That no evidence was brought on file in support of the charges leveled against appellant and the impugned order was based on ex-parte proceedings, therefore, the impugned order is not sustainable.
- d. That the District Police Officer Karak has discharged the appellant from the date of absence which is against the law and rules.
- e. That the appellant authority did not heard appellant in person and passed ex-parte order. The District Police Officer as well as the Regional Police Officer passed ex-parte orders which are nullity in eye of law.
- f. That appellant belongs to poor family and have spent sufficient amount on the treatment of mother.
- g. That appellant can do without expressing an English proverb that "man is to sin and God is to forgive."

It is therefore, requested that the impugned orders may be aside and appellant may be reinstated in service with back benefits.

Yours sincerely

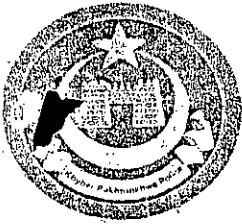
Attested
Inasirullah
Advocate Karak

19/
Date
4/2019

Ashraf Ali
Ex-constable No. 821
District Karak
Cell No. 03329664743

s/o Rehmat Ali R/o
Tappee Karak

8-2-2019



Amusement 415

20

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

No. S/ 777 /19, dated Peshawar the 15/03/2019.

To: The Regional Police Officer,
Kohat.

2101
Date 25-3-19

Subject: REVISION PETITION.

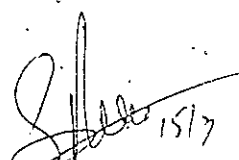
Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-Constable Ashraf Ali No. 821 of Karak District Police against the punishment of discharge from service awarded by District Police Officer, Karak vide OB No. 831, dated 23.06.2008 being badly time barred.

The applicant may please be informed accordingly.

EC
15/3

DPO Karak


(SYED ANIS-UL-HASSAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. 2790/EC
dt. 27/03/19.

For information of m. s.

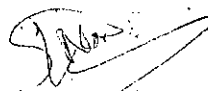
14/3/19

DIG POLICE
KOHAT


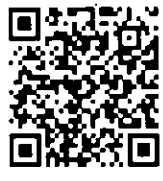
Attested
Hassanullah
Advocate Pesh

27/3/2019

OHC/SRC

for information.


21

قیمت 50 روپے	11840	  
ایڈوکیٹ: <u>عبد الرحمان</u>		
بار کونسل/ ایسوسی ایشن نمبر: <u>Bc-10-7332</u>		
رابطہ نمبر: <u>03439122233</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سر سید شریعی نیشنل ہدیر پختونخواہ

منجانب: <u>اشرف علی ولد رحمت علی ساکن جبکہ طرف</u>	دعویٰ: <u>سر سید شریعی نیشنل ہدیر پختونخواہ</u>
<u>اشرف علی</u>	علت نمبر: _____
<u>بنام</u>	مورثہ: _____
<u>حکومت خیبر پختونخواہ بزرگ سیکرٹری ہاؤس</u>	جرم: _____
<u>سول لائن روڈ، قمر شاہ آباد، ضلع</u>	تھانہ: _____
<u>ہزارہ پور، تھانہ، تھانہ، تھانہ</u>	

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ سرکار
 آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا بطرف یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم: 25-6-19

بد العبادہ شہد العبادہ

مقام: پشاور کے لیے منظور ہے۔

Attested & accepted

Rozhullah

Associate Advocate

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

اشرف علی 0899-0891478-9