

Reader Note:

26.11.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 11.02.2015 for the same.

  
Reader

4. 11.02.2015

Counsel for the appellant present. Requested for adjournment. Adjourned for preliminary hearing to 11.3.2015 before S.B.

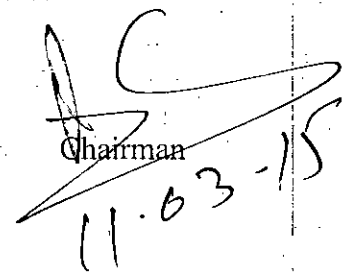
  
Chairman

5. 11.03.2015

Counsel for the appellant present. Application for withdrawal of appeal submitted wherein he has requested for withdrawal of the instant appeal as well as service appeals No. 1118, 1119 and 1120/2014.

In light of the said application, the appeal is dismissed as withdrawn. File be consigned to the record.



ANNOUNCED  
11.03.2015

  
Chairman  
11.03.15

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 1121/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08/09/2014	<p>The appeal of Mr. Umar Hayat presented today by Mr. Khan Akbar Khan 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	9-9-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <del>26-11-2014</del></p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No. 1121 /2014

**Umar Hayat**

Versus

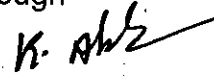
Inspector General of Police & others

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2.	Copy of Notification No.2394/ES dated 25.04.2014	"A"	6-11
3.	Copy Mercy/Review Petition	"B"	12
4.	Copy of Rejection Order dated 28 <sup>th</sup> May 2014	"C"	13-14
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Appellant

Through



(KHAN AKBAR KHAN)

Advocate, Peshawar.

Office: - 107-B, Town Tower,  
Jahangir Abad, University  
Road, Peshawar.

Cell No. 0344-9111911

Dated: -09/09/2014

①

**BEFORE THE SERVICE TRIBUNAL K.P.K AT PESHAWAR.**

Service Appeal No. 1121 /2014

**Umar Hayat** Head Constable No. 522

I/C Casualty Hospital Swabi,

District Wabi

1148  
08/9/2014

.....Appellant

Versus

1. Inspector General of Police, Khyber PakhtunKhwa, Peshawar.
2. Deputy Inspector General of Police, Mardan Region-I, Mardan.
3. District Police Officer, Swabi.
4. Gul Malik ASI, Operation Wing Nowshera.
5. Salim Nawaz ASI, Investigation Wing Mardan.
6. Ayaz Muhammad ASI, Investigation Wing Swabi.
7. Abdus Salam ASI, Operation Wing Mardan.
8. Javed ASI, Investigation Wing Mardan.
9. Shahi Mulk ASI, Operation Wing Mardan.
10. Zulfiqar ASI, Operation Wing Mardan.
11. Shahab ASI, Operation Wing Swabi.
12. Niaz Muhammad ASI, Operation Wing Swabi
13. Gul Bahadur ASI, Operation Wing Mardan.
14. Sabir Khan ASI, Investigation Wing Mardan.
15. Sajjad Ahmad, ASI, Operation Wing Mardan.
16. Wajid Ali ASI, Operation Wing Mardan.
17. Niaz Muhammad ASI, Operation Wing Mardan.
18. Mudassir Khan ASI, Operation Wing Mardan.
19. Baswar Khan ASI, Investigation Wing Mardan.
20. Muhammad Zahir ASI, Investigation Wing Mardan.

.....Respondents

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**APPEAL UNDER SECTION 4 OF THE SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE ORDER  
DATE 25.04.2014, WHEREBY THE PROMOTION  
OF APPELLANT WAS SUSPENDEND FOR NO  
GOOD REASONS.**

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8/9/14

PRAYER IN APPEAL:-

ON ACCEPTANCE OF THE INSTANT APPEAL, THE IMPUGNED ORDER DATED 25.04.2014, MAY KINDLY BE SET ASIDE AND THE RESPONDENT MAY GRECIOUSLY BE DIRECTED TO ISSUE PROMOTION ORDERS OF THE APPELLANT AS ASI, KEEPING IN VIEW HIS SERVICE RECORD

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RESPECTFULLY SHEWETH:

1. That the appellant was enlisted as Constable in the police department in the year 1988 and is performing his duties as Head Constable at I/C Casualty Hospital Swabi, District Swabi. Thus he has 26 years of service at his credit.
2. That in the entire service, performance of the appellant was upto the entire satisfaction of his superiors. During the duties his performance remained good and there were no complaints against him regarding his performance of duty or otherwise.
3. That respondent No. 2 vide his Notification No. 2394/ES dated 25.04.2014 suspended the promotion of appellant without just cause and reason and by superseding the appellant, his junior colleagues/respondents were promoted to the higher ranks. (Copy of the Notification No.2394/ES dated 25.04.2014 is attached herewith as **Annexure "A"**).
4. That against the said Notification, the appellant on dated 29.04.2014 filed a mercy/review petition before the respondent No.2 for reviewing/reversing his order referred to above in the best interest of justice, but the same was filed vide Order No. 2910/ES dated 28<sup>th</sup> May 2014. (Copies of the mercy/review petition and rejection order dated 28<sup>th</sup> May 2014 are attached herewith as **Annexure: - "B" & "C"** respectively).
5. That then on dated 22.05.2014, the appellant filed his representation/departmental appeal before the Respondent No.1, being competent authority but the same was not

decided by the respondent No.1 within the statutory period. (Copy of representation/departmental appeal is attached herewith as **Annexure: - "D"**).

6. That the appellant being aggrieved from the above-mentioned impugned Notification/order dated 25.04.2014, the appellant, after expiry of statutory period, approaches this Honorable Tribunal, on the following grounds inter-alia.

**GROUND:-**

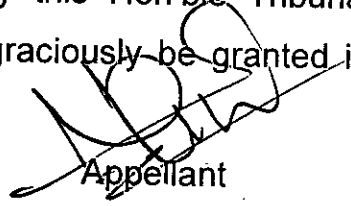
- A). That the impugned Notification/Orders dated 25.04.2014 is illegal, unlawful and against the principles of nature justice, hence untenable and liable to be set aside.
- B). That as per seniority list of Head Constables of Mardan Region , which stood on 31.12.2013, respondents No. 4 to 20 are junior to the appellant, but despite that the appellant was superseded by the respondent No.2 (Copy of the Seniority List is attached herewith as **Annexure "E"**).
- B). That the appellant having excellent ACR, was ignored by respondent No.2 while his junior colleagues having low qualification were promoted by superseding the appellant, in order to benefit the blue eyed employees in the department. Which is against the law and natural justice.
- C). That the appellant during his entire service never used any type of political pressure whatsoever and allegations of respondent No.2 regarding use of political pressure is based on assumption and presumption, without any sort of evidence, the appellant has performed his duties honestly, which has always been appreciated by the superior officers. Hence all the allegations are categorically denied.
- D). That the entire service and service roll of the appellant is a strong proof of his efficiency, honesty and merit and due to his efficiency the appellant was promoted as Head Constable in the year 2008, qualified intermediate college course in 2010/2011 and was awarded with cash reward CC-III, while the appellant got "A" report from his superior officers in his ACRs. (Copies of service record are attached herewith as **Annexure "F"**).
- E). That the appellant has served in the police department for long span of time extending over 26 years, with unblemished/spotless

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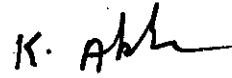
record. During his service he obtained various commendations certificate, regarding his efficiency and remarkable work.

For the afore mentioned reasons, It is, therefore, humbly prayed that on acceptance of this Appeal, the impugned Notification/order dated 25.04.2014, may kindly be set aside and the appellant may graciously be promoted as ASI, keeping in view his service record.

Any other relief deemed fit by this Hon'ble Tribunal under the circumstances, may also graciously be granted in favor of the appellant.

  
Appellant

Through



(KHAN AKBAR KHAN)

&



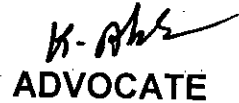
(SAIFULLAH MOHMAND)

Advocates, Peshawar.

Dated: -04/09/2014

**CERTIFICATE:**

Certified that as per information furnished by my client no such like service appeal on the subject has earlier been filed in this Hon'ble Tribunal.

  
ADVOCATE

5

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

Service Appeal No. \_\_\_\_\_/2014

***Umar Hayat***

Versus

Inspector General of Police & others

**AFFIDAVIT**

I, ***Umar Hayat*** Head Constable No.522 I/C Casualty Hospital Swabi, District Swabi, do hereby solemnly affirm and declare on oath that the contents of accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

*Umar Hayat*  
DEPONENT

31-5-14

ATTESTED  
NOTARY PUBLIC  
TR. CO. HIGH COURT PESHAWAR  
AHMUD ADVOCATE



DEPARTMENT.

MARDAN REGION.

Annex (A)

**PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II  
ORDERS BY THE DEPUTY INSPECTOR GENERAL OF POLICE, MARDAN REGION.**

## NOTIFICATION.

Dated 25-4-2014.

No. 2394 /ES, PROMOTION IN THE RANK OF OFFICIATING ASIS:-

As approved by the Departmental Promotion Committee meeting held on 15.04.2014, the following Head Constables (on list D) of Mardan Region have considered suitable for promotion as Offg: ASIs. On promotion they are posted to the District/Units as noted against each:-

S. No.	Name & Rank	From	To
1.	HC Abdul Wahid No. 359	Nowshera District (On promotion)	Operation Wing, Nowshera
2.	HC Amin Ullah No. 161	Mardan District (On promotion)	Operation Wing, Mardan
3.	HC Melabooob Ali No. 1032	Mardan District (On promotion)	Operation Wing, Mardan
4.	HC Azam Khan No. 57	Mardan District (On promotion)	Operation Wing, Mardan
5.	HC Shujat Khan No. 671	Swabi District (On promotion)	Operation Wing, Swabi
6.	HC Safdar Iqbal No. 826	Mardan District (On promotion)	Operation Wing, Mardan
7.	HC Noor ul Islam No. 799	Invest: Wing Swabi (On promotion)	Invest: Wing, Swabi
8.	HC Naik Sar Ali Khattak No. 588	Nowshera District (On promotion)	Invest: Wing Nowshera
9.	HC Sajjad Haider No. 1096	Swabi District (On promotion)	Operation Wing, Swabi
10.	HC Tariq Ali No. 1390	Mardan District (On promotion)	Invest Wing, Charsadda
11.	HC Mazhar Ali No. 854	Swabi District (On promotion)	Operation Wing, Swabi
12.	HC Siraj Nabi No. 109	Mardan District (On promotion)	Operation Wing, Mardan
13.	HC Rab Nawaz No. 744	Mardan District (On promotion)	Operation Wing, Mardan
14.	HC Akhtar Hussain No. 1198	Mardan District (On promotion)	Invest: Wing, Nowshera
15.	HC Abdul Wahab No. 88	Swabi District (On promotion)	Operation Wing, Swabi
16.	HC Hashmat Khan No. 1131	Mardan District (On promotion)	Invest: Wing, Mardan
17.	HC Abdul Ghaffar No. 906	Mardan District (On promotion)	Invest: Wing, Mardan
18.	HC Amjid Iqbal No. 382	Mardan District (On promotion)	Operation Wing, Mardan
19.	HC Faiz Muhammad No. 658	Mardan District (On promotion)	Invest: Wing, Mardan
20.	HC Raza Khan No. 507	Swabi District (On promotion)	Operation Wing, Swabi
21.	HC Muhammad Naeem No. 732	Swabi District (On promotion)	Operation Wing, Swabi
22.	HC Ayaz Ali No. 234	Mardan District (On promotion)	Operation Wing, Mardan
23.	HC Bashir Muhammad No. 96	Mardan District (On promotion)	Invest: Wing, Mardan

3042  
2/5/14.

Etc.

DPP Swabi  
24/4/14.

APPROVED  
BY THE DEPT. COMR  
MARDAN

SAIF ULLAH  
Advocate  
High Court Peshawar

24.	HC Gul Malik No. 174	Nowshera District (On promotion)	Operation Wing, Nowshera
25.	HC Saleem Nawaz No. 1059	Mardan District (On promotion)	Invest: Wing, Mardan
26.	HC Ayaz Muhammad No. 46	Swabi District (On promotion)	Invest: Wing, Swabi
27.	HC Abdus Salam No. 1307	Mardan District (On promotion)	Operation Wing, Mardan
28.	HC Javid No. 834	Mardan District (On promotion)	Invest: Wing, Mardan
29.	HC Shahi Mulk No. 394	Swabi District (On promotion)	Invest: Wing, Swabi
30.	HC Zulfqar No. 1019	Mardan District (On promotion)	Operation Wing, Mardan
31.	HC Shahab No. 418	Swabi District (On promotion)	Operation Wing, Swabi
32.	HC Niaz Muhammad No. 720	Swabi District (On promotion)	Operation Wing, Swabi
33.	HC Gul Bahadur No. 1033	Mardan District (On promotion)	Operation Wing, Mardan
34.	HC Sabir Khan No. 1266	Mardan District (On promotion)	Invest: Wing, Mardan
35.	HC Sajjad Ahmad No. 1327	Mardan District (On promotion)	Operation Wing, Mardan
36.	HC Wajid Ali No. 626	Mardan District (On promotion)	Operation Wing, Swabi
37.	HC Niaz Muhammad No. 652	Mardan District (On promotion)	Operation Wing, Mardan
38.	HC Mudasar Khan No. 447	Mardan District (On promotion)	Operation Wing, Charsadda
39.	HC Baswar No. 1237	Mardan District (On promotion)	Invest: Wing Nowshera
40.	HC Muhammad Zahir No. 1152	Mardan District (On promotion)	Invest: Wing, Mardan

Besides the following Head Constables on promotion to list "D" have considered conditionally for promotion as Offg: ASIs on the production of satisfactory ACRs for the prescribed period within 15 days. Otherwise their promotion order will be considered as cancelled. On promotion they are posted to the Districts/ Units as noted against each:-

S. No.	Name & Rank	From	To	Remarks
1.	HC Gul Akbar No. 784	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
2.	HC Ameer Nawab No. 774	Mardan District (on promotion)	Invest: Wing, Nowshera	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
3.	HC Roshan Akbar No. 517	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
4.	HC Shafi Ullah No. 983	Mardan District (On promotion)	Operation Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
5.	HC Abid Hussain No. 867	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
6.	HC Aziz Ur Rehman No. 1533	Mardan District (On promotion)	Operation Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
7.	HC Syed Nasir Ahmad No. 640	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the period from 01.01.2012 to 18.07.2012 & for the year 2013

*SAIF ULLAH*  
SAIF ULLAH  
Advocate  
High Court Peshawar

ADMITTED  
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8.	HC Yasin Shah No. 1225	Mardan District (On promotion)	Operation Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013
9.	HC Muhammad Jehangir No. 1355	Mardan District (On promotion)	Invest: Wing Nowshera	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
10.	HC Ajmal Khan No. 705	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
11.	HC Muhammad Ilyas No. 890	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
12.	HC Said Ul Amin No. 196	Swabi District (On promotion)	Invest: Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
13.	HC Saif Ul Islam No. 1054	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
14.	HC Iftikhar Shah No. 717	Swabi District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
15.	HC Jehangir Khan No. 1324	Mardan District (On promotion)	Operation Wing, Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
16.	HC Parwar Ali No. 261	Mardan District (On promotion)	Invest: Wing, Mardan	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
17.	HC Faqir Ahmad No. 207	Mardan District (On promotion)	Invest: Wing Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
18.	HC Rab Nawaz No. 381	Swabi District (On promotion)	Invest: Wing Swabi	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
19.	HC Shah Jehan No. 583	Mardan District (On promotion)	Invest: Wing Charsadda	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013

The following Head Constables on promotion to list "D" have considered suitable for promotion as Offg: ASIs & recommended for transfer to CTD Khyber Pukhtunkhwa, Peshawar as noted against each:-

S. No.	Name & Rank	Home District /Place of Posting	Recommended for CTD	Remarks
1.	HC Ali Akbar No. 881	Mardan District	Recommended for CTD	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
2.	HC Fazal Khaliq No. 354	Mardan District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
3.	HC Ibrar Ali No. 267	Mardan District (on deputation to Special Branch)	-do-	Nil
4.	HC Shah Jehan No. 186	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013
5.	HC Fazal Dawood No.	Mardan District	-do-	Nil
6.	HC Ameer Nawas No 3	Swabi District	Presently serving in CTD	Nil

*S. Ullah*  
S. ULLAH  
Ad.  
High Court Peshawar

APPROVED  
10/03/2013  
*[Signature]*

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7.	HC Fazal Hussain No. 116	Swabi District	Recommended for CTD	Nil
8.	HC Qasim No. 203	Swabi District	Presently serving in CTD	Nil
9.	HC Farooq No. 78	Swabi District	Recommended for CTD	Nil
10.	HC Subhan Ullah No. 868	Swabi District	-do-	Nil
11.	HC Safdar Rehman No. 215	Swabi District	-do-	Nil
12.	HC Fazal Akbar No. 433	Swabi District	-do-	Nil
13.	HC Amjid No. 1104	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
14.	HC Khan Muhammad No. 112	Swabi District	-do-	Nil
15.	HC Akhtar Munir No. 708	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
16.	HC Muhammad Zubair No. 22	Swabi District	-do-	Nil
17.	HC Shah Hussain No.	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
18.	HC Jehan Dad No. 1140	Swabi District	-do-	Nil

Besides the above recommendation made by the DPC held on 15.04.2014, the following Head Constables (on list D) of Mardan Region have considered suitable for promotion as Offg: ASIs. On promotion they will remain posted to the Units as noted against their names:-

S. No.	Name & No.	On deputation to	S. No.	Name & No.	On deputation to
1	HC Irshad Ahmad No. 611	Motorway Police	2	HC Bakht Ul Ayan No. 2100	Elite Force
3	HC Mukhtiar Ali No. 896	Elite Force	4	HC Amir Shad No. 205	Motorway Police
5	HC Ali Said No. 198	PTC Hangu	6	HC Mushtaq Ahmad No. 926	PTC Hangu
7	HC Aurang Zeb No. 1325	PTC Hangu	8	HC Atta Ur Rehman No. 156	Traffic Peshawar
9	HC Farhad Ali No. 58	Special Branch	10	HC Noorul Islam No. 1106	Traffic Peshawar
11	HC Anees Ahmad No. 198	Traffic Peshawar	12	HC Ifikhar Ahmad No. 891	Motorway Police

The following Head Constables on promotion to list "D" have considered conditionally for promotion as Offg: ASIs on the production of satisfactory ACRs for the prescribed period within 15 days. Otherwise their promotion order will be considered as cancelled. On promotion they will remain posted to the Units as noted against their names:-

S. No.	Name & No.	On deputation to	Remarks
1	HC Waqif Khan No. 600	Special Branch	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013.
2	HC Irad Ali No. 248	PTC Hangu	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2012
3	HC Muhammad Tahir No. 408	PTC Hangu	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
4	HC Fakhar e Alam No. 590	CCP Peshawar	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013
5	HC Jehangir No. 415.	Motorway Police	Promoted conditionally as Offg: ASI subject to production of satisfactory ACR for the year 2013

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The following Head Constables have been deferred/superseded due to reason noted against each:-

S. No.	Name & rank	Place of posting	Remarks
1.	IHC Miraj Habib No. 676	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
2.	IHC Zahir Ahmad No. 910	CTD Peshawar	Superseded due to inefficiency & putting Political pressure for choice posting
3.	IHC Muhammad Arif No. 1357	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
4.	IHC Noorul Amin No. 216	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
5.	IHC Murad Khan No. 717	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
6.	IHC Usman Ghani No. 1205	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
7.	IHC Bakhtawar Shah No. 809	CHD	Deferred due to under enquiry
8.	IHC Abdur Riaz No. 406	NSR	Superseded due to inefficiency & putting Political pressure for choice posting
9.	IHC Saeed Ullah No. 225/1899	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
10.	IHC Wali Muhammad No. 23	Crime Branch Invest.	Superseded due to inefficiency & putting Political pressure for choice posting
11.	IHC Mushtaq Ali No. 1244	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
12.	IHC Ghulam Rasool No. 878	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
13.	IHC Ayub Jan No. 1224	Mardan	Deferred due to "C" class report (adverse) for the year 2013
14.	IHC Ali Akbar No. 64	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
15.	IHC Mumriaz Gul No. 469	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
16.	IHC Zahir Shah No. 629	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
17.	IHC Alamgir No. 303	Mardan	Deferred due to "C" class report (adverse) for the year 2013
18.	IHC Shahenshah No. 605	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
19.	IHC Mohamanday No. 974	Mardan	Deferred due to "C" class report (adverse) for the year 2013
20.	IHC Nisar Khan No. 673	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
21.	IHC Zaid Muhammad No. 1607	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
22.	IHC Naeem Khan No. 912	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting

SAFI ULLAH  
Advocate  
High Court Peshawar

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23.	IHC Amjid Ali No. 843	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
24.	IHC Kameen Khan No. 264	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
25.	IHC Imtiaz Khan No. 1584	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
26.	IHC Farooq Hussain No. 823	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
27.	IHC Javid Ahmad No. 1292	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
28.	IHC Umar Hayat No. 522	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
29.	IHC Hamayun No. 118	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
30.	IHC Aziz Ur Rehman No. 1588	Mardan	Deferred due to inefficiency
31.	IHC Niaz Ali No. 1287	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
32.	IHC Imran Ali No. 1615	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
33.	HC Janab Ali No. 553	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
34.	IHC Ghaffar Ali No. 785	Swabi	Deferred due to inefficiency
35.	IHC Noor Muhammad No. 1489	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
36.	IHC Fawad Ali No. 1167	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
37.	IHC Bakht Zada No. 56	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting

Their promotion will take effect from the date they actually take over the charge of their higher responsibilities at their new place of posting.

(MUHAMMAD SAEED)PSP  
Deputy Inspector General of Police,  
Mardan Region-I, Mardan.

No. 2395-2411/ES,

1. Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar.
2. Inspector General of National Highways & Motorway Police House No. 7, Kaghan Road Sector F-8/3 Islamabad.
3. Additional Inspector General of Police Special Branch Khyber Pukhtunkhwa, Peshawar.
4. Capital City Police Officer, Peshawar.
5. Deputy Inspector General of Police Traffic, Khyber Pukhtunkhwa, Peshawar.
6. Deputy Inspector General of Police, CTD, Khyber Pukhtunkhwa, Peshawar.
7. Commandant Police Training College, Hangu.
8. Commandant Elite Force Khyber Pukhtunkhwa, Peshawar.
9. Deputy Inspector General of Police N-5 North Zone, National Highways & Motorway Police Islamabad.
10. All District Police Officers, in Mardan Region-I, Mardan.
11. All SPs Investigation, in Mardan Region-I, Mardan.
12. PA to DIG, Mardan.

(\*\*\*\*\*)

SAIF ULLAH  
High Court, Peshawar

APPROVED  
BY THE  
DIG

رغم درخواست تبادلہ

3

جناب عالی

گزارش ہے کہ بحوالہ نوٹیفیکیشن نمبر 2394 من 25-4-14 IHC کے کارروائی غیر تسلی بخش ہے اور تبادلہ کیلئے سیاسی اثر رسوخ استعمال کیا گیا ہے۔ لہذا اس سلسلہ میں ذیل گزارشات ہے

1) کہ من سائل نے جب ایڈووکیٹ کورس P.T.C سے پاس کرتے والی آ رہا۔ تو سائل کا تبادلہ انمولٹی گن براچ ہو کر اس دوران میں تھانہ لاہور سیکرٹری انکوائری اور اس کے علاوہ تھانہ زبیرہ تعینات رہا۔ تقریباً ڈس سال کا عرصہ انمولٹی گن میں گزارا۔ اس دوران جو بھی تفتیش من سائل کو حوالہ ہوئی۔ تو اسکو نہایت اچھے طریقے سے کر لائی۔

2) کہ من سائل انمولٹی گن کے بعد تقریباً چار ماہ پولیس لاہور میں تعینات رہا۔ پولیس لاہور میں بھی اپنی ذمہ داریاں کو بخوبی سمجھ کر سر انجام دی۔ اور یہی وجہ ہے کہ اس دوران تعیناتی کے دوران سائل کے خلاف کسی قسم کی رپورٹ یا زبانی شکایت کسی دفتر نے نہیں کی۔ اس سبب تھانہ لاہور میں تعینات ہے

3) کہ من سائل نے ابھی تک کسی بھی تبادلہ کیلئے کوئی سیاسی اثر رسوخ استعمال نہیں کی ہے۔ اور یہی وجہ ہے کہ میں نے تمام نوکری ایسی جگہوں پر ہی ہے جہاں سفارتی لوگ نوکری نہیں کرتے ہیں۔

استدعا ہے کہ من سائل کو اپنی سفارشی کے مطابق ایجوٹ کرنے کا حکم صادر فرمایا جاوے

DT 29-4-14

دعا گزار محمد سعید 522 تھانہ لاہور ضلع صدری

FORWARDED TO  
Sub-Divisional Police Officer  
Dated 29/4/14

5 in Farmer school  
5 Hops LHR  
29.4.14

SAIF ULLAH  
Advocate  
High Court Pesnawar

CIRCLE OFFICER  
(Invest) Gadoon

29.4.14

Pollock  
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21.05.14

**Government of Khyber Pukhtunkhwa**  
**Office of the Deputy Inspector General of Police**  
**Mardan Region-I, Mardan**  
Phone No. 0937-9230113, Fax No. 0937-9230115

From: The Deputy Inspector General of Police;  
Mardan Region-I, Mardan

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

No. 2910 /ES.

28, May, 2014.

Subject: DETAIL OF ORDERLY ROOM HELD AT REGION OFFICE, MARDAN.

Memo:

Details of orderly room held in this office on 21.05.2014 is submitted below please: -

S.No..	Name & Rank	Purpose of appearance	Order of the undersigned
1.	Inspector Mumtaz Ali MR/74	Request for transfer to Swabi District	Keep pending
2.	SI Ajab Khan	Request for transfer to Investigation, Wing.	Requested accepted
3.	SI Rashid Ullah	Request for cancellation of his transfer order from Invest: Wing, Charsadda	Requested accepted
4.	ASI Bashir Muhammad	Request for transfer from Invest: Wing to Police Lines	Next OR
5.	PASI Masood Khan	Request for re-instatement in service from date of suspension & for filing of departmental enquiry	Requested accepted
6.	ASI Zia Ul Haq	Request for re-instatement in service from date of suspension & for filing of departmental enquiry	Requested accepted
7.	ASI Hikmat Shah	Request for re-instatement in service from date of suspension & for filing of departmental enquiry	Requested accepted
8.	IHC Bakhtwar Shah	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
9.	IHC Usman Ghani No: 1205	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
10.	IHC Abdur Riaz No. 406	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
11.	IHC Janab Ali No. 553	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
12.	IHC Wali Muhammad	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
13.	IHC Shahenshah No. 605	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
14.	IHC Umar Hayat No. 522	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
15.	IHC Zahir Shah No. 629	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed

SAFUD  
High Court Peshawar



14 19

16.	IIC Farooq Hussain No. 823	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
17.	IIC Kameen Khan No. 264	Request for promotion as Offg: ASI as he was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed
18.	IIC Javid Ahmad No. 1292	Request for transfer to Mardan District	Request accepted
19.	IIC Muhammad Anwar No. 1025	Request for transfer to Investigation Staff OR Traffic Staff	Sent to SP Operation for consideration
20.	IIC Abdul Wali No. 876	Request for promotion as C-II IIC	Sent to DPO/Mardan to consider him on merit
21.	IIC Hassan Dad No. 305	Request for allowing service in BPS-07 as HC C-II up to the age of 60 years	Filed
22.	Constable Kashif No. 3383	Request for transfer to Nowshera District	Request accepted
23.	Constable Basil Ali No. 2732	Request for posting as ATS Instructor in Police Lines	Request accepted
24.	Constable Said Nigar No. 920	Request for the allotment of once increment & 70 days pay	Filed
25.	Constable Muddasir Khan No. 2081	Request for transfer to Elite Force	Request accepted
26.	Constable Painsa Gul No. 826	Request for the release of Pay	Sent to DSP/HQrs Mardan for enquiry
27.	Constable Avaz Khan No. 3155	Request for transfer to Elite Force	Request accepted
28.	Constable Farnan Uddin No. 372	Request for medical aid	Approved
29.	Constable Saeed Ullah No. 739 (suspended)	Request for filing of departmental enquiry	SP Operation, Mardan for completion of enquiry
30.	Ex-PASI Mikhhar Khan	Request for re-instatement in service	Denovo enquiry conducted by SP Operation, Mardan
31.	Ex-PASI Hussain Qadir	Request for re-instatement in service	Denovo enquiry conducted by SP Operation, Mardan
32.	Ex-Constable Mikhhar Ahmad No. 364 (Band Staff)	Request for re-instatement in service	Keep pending
33.	Ex-Constable Javid (Band Staff)	Request for re-instatement in service	Keep pending
34.	Ex-Constable Hazrat Bilal No. 3067	Request for re-instatement in service	Enquiry conducted by SP Operation, Mardan
35.	Ex-Constable Ejaz No. 424	Request for re-instatement in service	Enquiry conducted by SP Operation, Mardan
36.	Ex-Constable Jaffar Shah No. 2699	Request for re-instatement in service	Re-instated in service
37.	Ex-Constable Jehanzeb No. 351	Request for re-instatement in service	Filed
38.	Ex-Constable Asif Israr No. 3205	Request for re-instatement in service	Filed
39.	Ex-Constable Taimoor No. 1919	Request for re-instatement in service	Keep pending
40.	Ex-SPO Muhammad Ali No. 302	Request for re-instatement in service	Absent from OR
41.	Ex-Constable Aftab Akbar No. 2626	Request for re-instatement in service	Re-instated in service
42.	Ex-Constable Raid Ullah No. 2022	Request for re-instatement in service	Re-instated in service
43.	Ex-Constable Ijaz No. 3523	Request for re-instatement in service	Re-instated in service
44.	Ex-Constable Shamsul Wariseen No. 1464	Request for re-instatement in service	Filed
45.	Ex-Constable Mushtaq No. 1747	Request for re-instatement in service	Re-instated in service
46.	Ex-Constable Shehzad No. 1174	Request for re-instatement in service	Re-instated in service
47.	Ex-Constable Muhammad Humayun No. 3161	Request for re-instatement in service	Re-instated in service
48.	Ex-Driver Constable Sajjad 1105	Request for re-instatement in service	Re-instated in service

No. 2811-14/ES.

Copy to All DPOs in Mardan Region-I, Mardan for information and necessary action.

(MUIHAMMAD SAEED)PSP  
Deputy Inspector General of Police  
Mardan Region-I, Mardan.

(MUIHAMMAD SAEED)PSP  
Deputy Inspector General of Police.  
Mardan Region-I, Mardan.

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3263  
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613

*[Handwritten signature]*

SAIF ULLAH  
Adv. rate  
High Court Peshawar

15

Annex (D) ①

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

Subject:- APPLICATION AGAINST THE ORDER OF DEPUTY INSPECTOR GENERAL OF POLICE, MARDAN REGION-I, MARDAN DATED 25.04.2014 VIDE WHICH THE PROMOTION OF APPELLANT WAS SUPERSEDED.

Respectfully,

1. That the appellant was enlisted as Constable in Police Department on 10.12.1988 in District Police Swabi.
2. That on 2003 the appellant was selected for Lower School Course & promoted as Head Constable in the year ~~2003~~ 2008.
3. That in the year 2011 appellant was selected for intermediate College course, which was successfully qualified by the appellant.
4. That the appellant was awarded with cash reward CC-III.
5. That the appellant got "A" reports from superior officers in A.C.Rs
6. That during the entire service the appellant never used any type of political pressure what so ever and remained efficient in the duties.
7. That my entire service and service roll is a strong proof of my efficiency, honesty and merit.

**PRAYER.**

Therefore, this is very humbly prayed that the order of Deputy Inspector General of Police, Mardan Region-I, Mardan dated 25.04.2014 may very graciously be set aside and the appellant be promoted as ASI keeping in view the service record in the interest of justice.

Dated : 21.05.2014.

Your obediently.

UMAR HAYAT No.522/IHC  
I/C Casualty Hospital Swabi  
District Swabi.  
Cell No.0305-5809725.

Reg.  
for n.a.  
4780  
2705

Dy NO: 1697/E IV

22/5/2014

SAIF ULLAH  
Advocate  
High Court Peshawar

for  
21

ANNEX  
Annet (E)

MARDAN REGION.

POLICE DEPARTMENT.

SENIORITY LIST OF "D" LIST HEAD CONSTABLES OF MARDAN REGION. STOOD ON 31.12.2013.

S. No.	Name & No.	Date of Birth	Dated of enlistment	Educ.	Date of admission to list "D"	Remarks
1.	IHC Abdus Samad No. 126	27.01.1957	05.03.1975	10 <sup>th</sup> /MRD	01.10.1994	Not willing for promotion as Offg. ASI for ever
2.	IHC Farman Ghani No. 855	07.02.1971	11.10.1989	BA/MRD	20.03.2004	Not willing for promotion for ever
3.	IHC Muhammad Askar No. 385	07.04.1969	19.06.1988	10 <sup>th</sup> /MRD	20.03.2004	Not willing for transfer on promotion to Mardan District vide Special Branch letter No. 756/ES dated 07.02.2009 filed in DPC 30.12.2008
4.	IHC Muhammad Ayaz No. 1342	09.01.1970	06.08.1991	10 <sup>th</sup> /MRD	25.07.2007	Not willing
5.	IHC Sardar Ali No. 1639	01.11.1969	26.09.1988	10 <sup>th</sup> /MRD	20.03.2010	
6.	IHC Irshad Ahmad No. 611	06.07.1972	25.09.1991	BA/NSR	20.03.2010	
7.	IHC Miraj Habib No. 676	05.02.1975	02.04.1994	10 <sup>th</sup> /MRD	20.03.2010	
8.	IHC Zahir Ahmad No. 910	12.03.1974	21.09.1993	FA/MRD	20.03.2010	
9.	IHC Abdul Wahid No. 23/359	06.12.1974	15.07.1999	10 <sup>th</sup> /NSR	20.09.2010	
10.	IHC Aman Ullah No. 161	04.08.1970	01.07.1991	FA/MRD	20.09.2010	
11.	IHC Mehboob Khan No. 1032	01.01.1970	11.04.1991	10 <sup>th</sup> /MRD	20.09.2010	
12.	IHC Muhammad Arif No. 1357	15.12.1972	13.08.1991	10 <sup>th</sup> /MRD	20.09.2010	
13.	IHC Noorul Amin No. 216	02.04.1974	24.10.1995	BA/MRD	20.09.2010	
14.	IHC Gul Akbar No. 784	15.01.1970	01.12.1991	FA/SWB	20.09.2010	
15.	IHC Azam Khan No. 57	16.01.1983	26.04.2005	FA/MRD	20.09.2010	
16.	IHC Murad Khan No. 717	01.11.1975	10.03.1996	FA/MRD	20.09.2010	
17.	IHC Ibrar Ali No. 267	16.03.1976	26.06.1996	FA/MRD	20.09.2010	
18.	IHC Bakht ul Ayan No. 210	20.02.1977	26.06.1996	10 <sup>th</sup> /MRD	20.09.2010	
19.	IHC Mukhtar Ali No. 896	01.01.1977	31.01.1995	FA/MRD	20.09.2010	
20.	IHC Shujat Khan No. 671	01.04.1971	22.02.1992	FA/SWB	20.09.2010	
21.	IHC Niaz Muhammad No. 154	25.12.1970	18.06.1995	FA/MRD	20.09.2010	
22.	IHC Usman Ghani No. 1205	25.12.1970	18.06.1995	FA/MRD	20.09.2010	
23.	IHC Usman Ghani No. 1205	04.02.1972	11.07.1991	10 <sup>th</sup> /MRD	20.09.2010	
24.	IHC Safdar Rehman No. 215	02.04.1970	16.08.1994	FA/SWB	20.09.2010	
25.	IHC Safdar Iqbal No. 826	07.01.1970	23.04.1991	10 <sup>th</sup> /SWB	20.09.2010	
26.	IHC Ameer Nawab No. 774	07.11.1971	31.12.1992	10 <sup>th</sup> /MRD	20.09.2010	
27.	IHC Amir Shad No. 205	03.04.1967	28.12.1986	FA/MRD	20.09.2010	
28.	IHC Amir Shad No. 205	01.01.1971	26.06.1996	FA/MRD	20.09.2010	
29.	IHC Bakhtawar Shah No. 809	24.04.1969	01.07.1991	10 <sup>th</sup> /CHD	20.09.2010	
30.	IHC Abdur Riaz No. 55	11.04.1974	13.11.1998	10 <sup>th</sup> NSR	20.03.2011	
31.	IHC Imtiaz Ali No. 194	05.06.1975	01.09.1996	10 <sup>th</sup> /MRD	20.03.2011	
32.	IHC Noorul Islam No. 100/782 (On deputation to PTC Hangu)	08.02.1978	25.04.1998	10 <sup>th</sup> /SWB	20.03.2011	
33.	IHC Ameer Nawas Khan No. 3	05.11.1973	08.01.1995	BA/SWB	20.03.2011	
34.	IHC Roshan Akbar No. 517	16.03.1970	10.12.1988	10 <sup>th</sup> /SWB	20.03.2011	
35.	IHC Saeed Ullah No. 225	15.03.1975	17.03.1996	BA/MRD	20.03.2011	
36.	IHC Naik Sar Ali Khattak	01.02.1970	01.07.1990	10 <sup>th</sup> /MRD	20.03.2011	
37.	IHC Saif-ud-Din No. 1006	02.03.1968	20.03.1988	FA/SWB	20.03.2011	

16

*[Handwritten signature]*

**RECEIVED**  
MARDAN DISTRICT POLICE OFFICE  
2013

Inspector General  
Documents

Affidavit dated "12/16-17" "B"



✓ 132	IHC Fakhre Alam No. 590	10.04.1977	26.03.1999	BA/MRD	20.03.2013	
✓ 133	IHC Wajid Ali No. 626	03.07.1979	05.05.1999	FA/MRD	20.03.2013	
✓ 134	IHC Shah Jehan No. 186	01.03.1978	02.11.1999	FA/MRD	20.03.2013	
✓ 135	IHC Niaz Muhammad No. 652	13.04.1976	31.07.1998	FA/MRD	20.03.2013	
✓ 136	IHC Mudassir Khan No. 447	03.06.1977	20.07.1998	FA/MRD	20.03.2013	
✓ 137	IHC Basar No. 1237	19.03.1973	19.12.1994	FA/MRD	20.03.2013	Restored to his original rank of IHC vide this office order endorsement No. 3990-91/ES dated 12.09.2013
138	IHC Iftikhar Ahmad No. 891	01.02.1978	21.04.1996	FA/SWB	20.03.2013	
139	IHC Rab Nawaz No. 381	10.04.1977	17.07.1995	FA/SWB	20.03.2013	
140	IHC Jehangir Khan No. 415	01.12.1970	01.07.1991	FA/MRD	20.03.2013	
141	IHC Rashid Ali No. 96	10.03.1973	13.04.1992	FA/SWB	20.03.2013	
142	IHC Intizar Ali No. 237	01.02.1976	05.12.1994	FA/MRD	20.03.2013	

No. 467-76TES

Dated Mardan the 29/01 /2014.

*(Signature)*  
 (MUHAMMAD SAEED) PSP  
 Deputy Inspector General of Police,  
 Mardan Region-I, Mardan.

Copy of above is forwarded for information and necessary action.

1. All DPOs of Mardan Region.
2. All SPs Investigation of Mardan Region.

They are requested to please inform all officers serving under their command. Any officer who have objection on his seniority/ correction, he should submit his representation within 15 days after the issue of the list otherwise no representation will be accepted.

644  
28/1/14

**AWESSED**  
*(Signature)*  
 28/1/14

*EC/OP*  
*for Mardan*  
*28/1/14*

*(Signature)*

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(20) Annex (P) (D)

# Police Training College, Hangu



Estbd: 1935

## Performance Report

Starting Date	:01.04.2011	Ending Date	: 20.09.2011
College Course	:Intermediate	Name	: Umar Hayat
Father Name	:Said Mehmood	Rank	:HC
Belt No.	:522	District/Unit	: Swabi
D.O.B	:20.04.1970	Education	:10th
Comp#:	:1-708	Company	:Khurshheed Shaheed
Merit	:165	Squad	: D

Subjects	Marks obtained	Marks allotted	Subjects	Marks obtained	Marks allotted	Months	General Test	Remarks	
PPC	61.5	/100	Parade	8.67	/15.00	Dec.	Nil /100	Re-appeared in the term ending 20.03.2012. Declared Passed	
CrPC/QS	53	/100	PT	10	/20.00	Feb.	Nil /100		
LSL	55	/100	FC	31.33	/50.00				
PR	67.5	/100	MD	28.33	/40.00				
IST	31	/50	DPA	33.33	/50.00				
MJ	51	/100	A.Fire SMG	144	/150.00				
S.A	55	/100	Sniper Fire	50	/100.00				
PPWT	50.5	/100	R. On P.O's	11	/15.00				
PPWP	55	/100	Ambush	11	/15.00				
FPT	32.5	/40	Naka Bandi	11	/15.00				
AC	22.5	/30	Ttl:	338.66	/470				
FPP	19	/30							Overall %age is: 62.91
PCE	32.67	/50							
<b>Total</b>	<b>586.17</b>	<b>/1000</b>							
<b>Grand Total</b>		<b>924.83 /1470.00</b>							

Leave Obtained: Nil Medical Rest: Nil Absence: Nil Punishment: Nil Reward: Nil

Comments:- \_\_\_\_\_

Checked and found correct.

*[Signature]*  
Controller of examinations.

*[Signature]*  
Commandant,  
Police Training College, Hangu.

*[Signature]*  
**SAIF ULLAH**  
Advocate  
High Court Peshawar

20

W A K A L A T N A M A

BEFORE THE COURT OF Service Tribunal K-P-K Peshawar

\_\_\_\_\_ No \_\_\_\_\_ of 2014

Umar Hayat Head constable

(Petitioner)

(Plaintiff)

**VERSUS**

Inspector General of Police K-P-K

Peshawar and others (Respondent)

I/We Umar Hayat

In the above noted Appeal do hereby appoint

and constitute **Mr. Khan Akbar Khan** Advocate as my/ our Counsel in the subject proceedings and authorize him to appear, plead etc compromise, withdraw or refer the matter for arbitration for me/ us without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel at our/my expense and receive all sums and amounts payable to us/ me and to all such acts which he may deem necessary for protecting my/ our interest in the matter. He is also authorized to file Appeal, Revision, Application for restoration or application for setting asiding exparte decree proceedings on my/ our behalf.

Dated: - / /2014



(Client)




**(KHAN AKBAR KHAN)**

Advocate, High Court, Peshawar.

Office Address: - B-107, Town Tower  
Jahangir Abad,  
University Road, Peshawar.

Cell No: - 0344-9111911

  
**SAIF ULLAH**  
Advocate  
High Court Peshawar

Before the Chairman Service Tribunal  
Khyber Pakhtunkhwa, Peshawar.

Umair Hayat vs Police Department  
Et  
3 other appeals

Application for withdrawal of  
appeal no. 1119/14, 1120/14, 1121/14 & 1118/2014

Respectfully shows:-

1) That the above-mentioned appeals  
are pending adjudication before this  
Honorable court, which is fixed for  
today i.e. 11/03/2015

11/03/15

That in the captioned appeals, the  
appellants have been granted the relief  
sought by them from the department concerned,  
hence these appeals have become infructuous.

It is, therefore, most humbly prayed  
that on acceptance of this application, the  
above-mentioned, 4 appeals may kindly  
be dismissed as withdrawn.

dated: 11/3/2015

Appellants  
through adully  
Safullah Memon  
Advocate, Pesh