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.

Keader'

11.02.2015

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

Chairman

11.03.2015

Counsel for the appellant present. Submitted application for withdrawal of appeal in service appeal No. 1121/14, in the light whereof, the appeal is dismissed as withdrawn. File be consigned to the record.

ANNOUNCED 11.03.2015

Chairman

.

Form- A FORM OF ORDER SHEET

Court of	
Case No	1120/2014

	Case No	1120/2014
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	08/09/2014	The appeal of Mr. Zahir Shah presented today by Mr.
1	·	Khan Akbar Khan Advocate may be entered in the Institution
		register and put up to the Worthy Chairman for preliminary
		hearing.
		REGISTRAR /
2	9-8-9011	
2	9-3-2014	This case is entrusted to Primary Bench for preliminary hearing to be put up there on $26-11-20/4$
		rhearing to be put up there on 2007
		CHAIRMAN
•		
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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA AT PESHAWAR.

Zahir Shah

Versus

Inspector General of Police & others

INDEX

Serial	Description of documents	Annexure	Page
No.			No.
1.	Memo Of appeal along-with affidavit	,	1-5
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 th May 2014	"C"	13-14
5.	Copy of Representation/Departmental appeal	"D"	15
6.	Oppy of Seniority Lists	E'	16-19
4.4	Part of the second	•	<u> </u>
/f/ 	Wakalat Nama	1	20

Appellant

Through

Dated: 4/09/2014

الم المراققة المراقق

Advocate, Peshawar.

Office: ~

107-B, Town Tower,

Jahangir Abad, University

Road, Peshawar.

Cell No.

0344-9111911

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA AT PESHAWAR.

Service Appeal No. _____/2014

1149

Zahir Shah Head Constable No.629

Investigation Wing

PS Topi District Swabi

.Appellant

Versus

- Inspector General of Police, Khyber PakhtunKhwa,
 Peshawar
- Deputy Inspector General of Police, Mardan Region-I, Mardan.
- District Police Officer, Swabi.
- 4). Rab Nawaz ASI, Operation Wing Mardan.
- 5) Akhtar Hussain ASI, Investigation Wing Nowshera.
- 6). Abdul Wahab ASI, Operation Wing Swabi.
- 7). Hashmat Khan ASI, Investigation Wing Mardan.
- 8). Abdul Ghaffar, ASI, Investigation Wing Mardan.
- 9). Amjad Iqbal ASI, Operation Wing Mardan.
- 10). Faiz Muhammad ASI, Investigation Wing Mardan.
- Raza Khan ASI, Operation Wing Swabi.
- 12). Muhammad Naeem ASI, Operation Wing Swabi.
- 13). Ayaz Ali ASI, Operation Wing Mardan.
- 14). Bashir Muhammad ASI, Investigation Wing Mardan.
- 15. Gul Malik ASI, Operation Wing Nowshera.
- 16. Salim Nawaz AŞI, Investigation Wing Mardan.
- 17. Ayaz Muhammad ASI, Investigation Wing Swabi.
- 18. Abdus Salam ASI, Operation Wing Mardan.
- 19. Javed ASI, Investigation Wing Mardan.
- 20. Shahi Mulk ASI, Operation Wing Mardan.
- 21. Zulfiqar ASI, Operation Wing Mardan.
- Shahab ASI, Operation Wing Swabi.
- 23. Niaz Muhammad ASI, Operation Wing Swabi
- 24 Gul Bahadur ASI, Operation Wing Mardan.
- 25. Sabir Khan ASI, Investigation Wing Mardan.





- 26. Sajjad Ahmad, ASI, Operation Wing Mardan.
- 27. Wajid Ali ASI, Operation Wing Mardan.
- 28. Niaz Muhammad ASI, Operation Wing Mardan.
- 29. Mudassir Khan ASI, Operation Wing Mardan.
- 30. Baswar Khan ASI, Investigation Wing Mardan.
- 31. Muhammad Zahir ASI, Investigation Wing Mardan.

.....Respondents

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATE 25.04.2014, WHERBY THE PROMOTION OF APPELLANT WAS SUSPENDEND FOR NO GOOD REASONS AND JUNIOR COLLEAGUES OF THE APPELLANT WERE PROMOTED.

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

RESPECTFULLY SHEWETH:

- That the appellant was enlisted as Constable in the police department in the year 1991 and is performing his duties as Head Constable in Police Station Topi, District Swabi, thus he has more than 23 years of service at his credit.
- 2. That during 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

- 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 28th May 2014. (Copies of the mercy/review petition and rejection order dated 28th 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.

GROUNDS:-

- 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 31 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"*).
- C). 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.
- D). 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.

- E). 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.
- F). That the appellant has served in the police department for long span of time, with unblemished/spotless 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.

Through

(KHAN AKBAR KHAN)

&

(SAIFULLAH MOHMAND

Advocates, Peshawar.

CERTIFICATE:

Dated: -04/09/2014

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

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA AT PESHAWAR.

Service Ap	neal No	/2014
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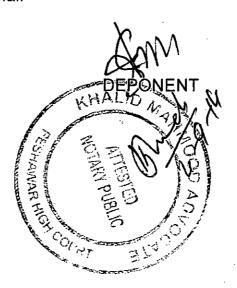
Zahir Shah

Versus

Inspector General of Police & others

<u>AFFIDAVIT</u>

I, Zahir Shah Head Constable No.629, Investigation Wing, PS Topi 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.



Annel (A)

REPUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II, RDERS BY THE DEPUTY INSPECTOR GENERAL OF POLICE, MARDAN REGION.

NOTIFICATION.

Dated 25-4- 12014

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

As approved by the Departmental Promotion Committee meeting held on 15.04.2014, the following Hend 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:

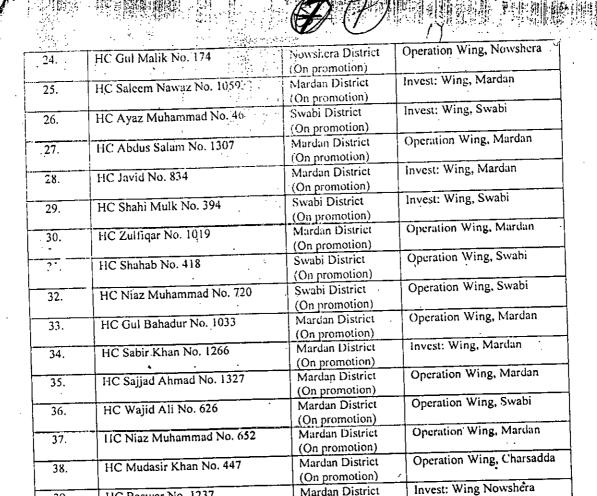
N1	Name & Rank	From	To No. No. No. No. No. No. No. No. No. No
\o	HC Abdul Wahid No. 359	Nowshera District	Operation Wing, Nowshera
l	TIC Adda Walle 110. 327	(On promotion)	<u> </u>
 -	HC An an Ullah No. 161	Mardan District	Operation Wing, Mardan
2.	TIC. All all Chair For To.	(On promotion)	
3.	HC Mehboob Ali No. 1032	Mardan District	Operation Wing, Mardan
٥.	The Interioopa Till Troi Tool	(On promotion)	
4.	HC Azam Khan No. 57	Mardan District	Operation Wing, Mardan
+ .	The Azam renam (10.5)	(On promotion)	
5,	HC Shujat Khan No. 671	Swabi District	Operation Wing, Swabi
J.	11.	(On promotion)	
6.	HC Satdar Iqbal No. 826	Mardan District	Operation Wing, Mardan
Ų.		(On promotion)	1
7.	HC Noor ui Islam No. 799	Invest: Wing Swabi	Invest: Wing, Swabi
,.	_	(On promotion)	NV NI-mak
8.	HC Naik Sar Ali Khattak No. 588	Nowshera District	Invest: Wing Nowshera
0,		(On promotion)	The state of the s
9.	HC Sajjad Haider No. 1096	Swabi District	Operation Wing, Swabi
<i>,</i> .		(On promotion)	Invest Wing, Charsadda
II)	HC Tariq Ali No. 1390	Mardan District	Invest Wing, Charsadda
117.		(On promotion)	Operation Wing, Swabi
11.	HC Mazhar Ali No. 854	Swabi District	Operation wing, Swatt
• • •		(On promotion)	N/ - Mardon
12.	HC Siraj Nabi No. 109	Mardan District	Operation Wing, Mardan
12.		(On promotion)	
13.	HC Rab Nawaz No. 744	Mardan District	Operation Wing, Mardan
13.	The time to	(On promotion)	
14.	HC Akhtar Hussain No. 1198	Mardan District	Invest: Wing, Nowshera
1-4.		(On promotion)	
lš.	HC Abdul Wahab No. 88	Swabi District	Operation Wing, Swabi
13.	The Model Wallet	(On promotion)	
16.	HC Hashmat Khan No. 1131	Mardan District	Invest: Wing, Mardan
10.		(On promotion)	100
17.	HC Abdul Ghaffar No. 906	Mardan District	Invest: Wing, Mardan
• • •		(On promotion)	O wise Wise Mardon
18.	HC Amjid Iqbal No. 382	Mardan District	Operation Wing, Mardan
•		(On promotion)	Invest: Wing, Mardan
19.	HC Faiz Muhammad No. 658	Mardan District	invest: wing, windan
		(On promotion)	Operation Wing, Swabi
20.	HC Raza Khan No. 507	Swabi District	Operation wing, Swath
4		(On promotion)	Operation Wing, Swabi
21.	HC Muhammad Naeem No. 732	Swabi District	Operation wing, Swam
- • •		(On promotion)	Nine Mandan
22.	HC Ayaz Ali No. 234	Mardan District	Operation Wing, Mardan
		(On promotion)	
23.	HC Bashir Muhammad No. 96	Mardan District	Invest: Wing, Mardan
43,	TIC Dashir treatment	(On promotion)	

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Der Joseph,



SAIT ACCOUNT



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:-

Mardan District

(On promotion)

Mardan District

(On promotion)

Invest: Wing, Mardan

HC Baswar No. 1237

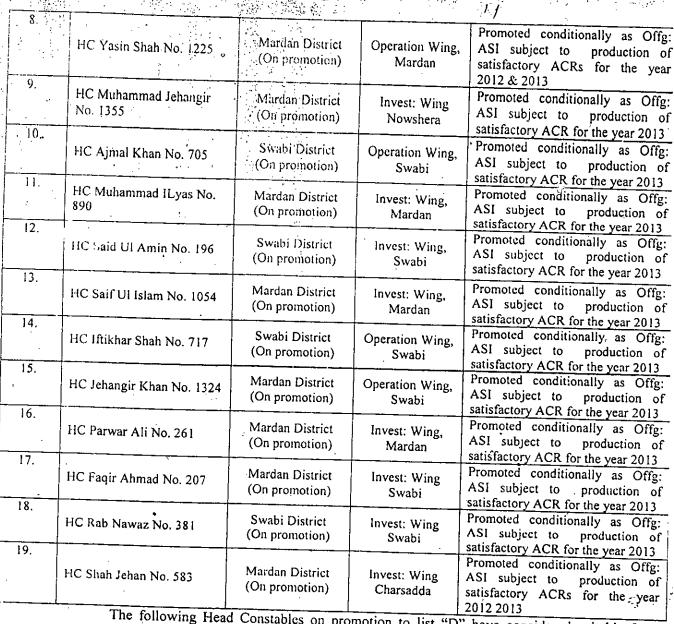
HC Muhammad Zahir No. 1152

39.

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5. No.	Name & Rank	From	То	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 us 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.	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.	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

Court Poshawar



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 o satisfactory ACR for the year 2013
3.	HC Ibrar Ali No. 267	Mardan District (on deputation to Special Branch	-do-	Nil
4. 5.	HC Shah Jehan No. 186	Swabi District	-do-	Promoted conditionally as Offg: ASI subject to production of satisfactory ACRs for the year 2012 & 2013
٥.	HC Fazal Dawood No.	Mardan District	-do-	Nil
6.	HC Ameer Nawas No 3	Swabi District	Presently serving in CTD	Nil



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	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 Iftikhar 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
l •	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

SAIR DISTRIBUTE



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 Peshawa	Superseded due to inefficiency &
3	HIC Muhammad Arif No. 1357	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
4.	C 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.	IIIC Usman Ghani No. 1205	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
7.	IHC Bakhtawar Shah No. 809	CHD	
8.	IHC Abdur Riaz No. 406	NSR	Superseded due to inefficiency & putting Political pressure for choice posting
9.	IHC Saced 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.	IIIC 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.	MC 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
20.	IHC Nisar Khan No. 673	Mardan	Superseded due to inefficiency & putting Political pressure for choice posting
21.	IHC Zaid Muhammad No. 1607	Mardan g	Superseded due to inefficiency & putting Political pressure for choice posting
22.	HC Naeem Khan No. 912	Mardan p	Superseded due to inefficiency & putting Political pressure for choice sosting
			Julia





		30004 (4)	99	
	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
ĺ	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
1/	33.	HC Janab Ali No. 553	Swabi	Superseded due to inefficiency & putting Political pressure for choice posting
-	<u>34.</u>	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

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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,

(全) 樹脂舞 衛

Copies for information and necessary action to the:-

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.

Additional Inspector General of Police Special Branch Khyber Pukhtunkhwa, Peshawar.

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.

Commandant Police Training College, Hangu.

Commandant Elite Force Khyber Pukhtunkhwa, Peshawar.

Deputy Inspector General of Police N-5 North Zone, National Highways &

Motorway Police Islamabad.

All District Police Officers, in Mardan Region-I, Mardan.

All SPs Investigation, in Mardan Region-I, Mardan.

PA to DIG, Mardan.

SAIF ULLIANDE (***



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1 de lo درواس مراب در الرئال لوسفال عراب المرائل الموالية المرائل مردان مردان الموالية المرائل مردان مردان الم 05. ... Uppglp 16 1991 Um Juny S. a. Bb & J. 1. 2 المرسان عالم المسال كران 2003 مرانيم علمان سال كران من المام المواقع من المان من المواقع من المواقع المان من المواقع المان من المواقع المان من المواقع المان من المواقع المناقع ا Tome I will be with the sail of the sail of the · ctim (in) 4 John Charling cooperations = Lording 2 June 33 . a Wishing . a first recipion in for the dewing gold serie ip & s U, lin , 10 lie in Asi of est con is Us Us. Us. ا فَرُ عِلْمَ وَمَا رُمَا مِنْ سَالًى كُونَ رُونَا وَلِلْ 49 3 col is is wer 629 0 C/b /26/? 0344-3785655 N-951111111 Forwadod please Quidax ougips leeps 39.4.14 Por warded please. Advocate Merican Garages High Court Pashawa



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

The Deputy Inspector General of Police;

Mardan Region-I, Mardan

To:

The Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar.

No. 2810

Subject:

AT REGION OFFICE, MARDAN.

Memo:

Details of orderly room held in this office on 21.05.201

S. No.	Name & Rank	Purpose of appearance	Order of the
1.	Inspector Mumtaz Ali MR/74		undersigned
2.	SI Ajab Khan	Request for transfer to Swabi District	Keep pending
3.	SI Rashid Ullah	Request for transfer to Investigation, Wing,	Requested accepted
	ASI Bashir Muhammad	Request for cancellation of his transfer order from Invest: Wing, Charsadda	Requested accepted
4.	<u> </u>	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.	HIC Bakhtwar Shah HIC 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
9.	BIC 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
10.	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
	IHC Wali Muhammad	was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15 04 2014	Filed
C.	IHC Shahenshah No. 605	was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	iled
(13)	IHC Umar Hayat No. 522	was superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15 04 2014	Pried
	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 Request for promotion as Offg: ASI as he was	Filed
		superseded due to inefficiency & putting Political pressure for choice posting in the DPC held in this office on 15.04.2014	Filed Filed

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1	HC Farooq Hussain No. 823	Request for promotion as Offg: ASI as he was	
'	,	superseded due to inefficiency & putting	
16,		Political pressure for choice posting in the DPC.	Filed
		held in this office on 15.04.2014	•
	IIIC Kameen Khan No. 264	Request for promotion as Offg: ASI as the was	
	The realisecti retail (40, 204	request for promotion as Offg. ASI as he was	
_ 17		superseded due to inefficiency & putting	Filed
17.	•	Political pressure for choice posting in the DPC	,
18.	HIC Javid Ahmad No. 1292	held in this office on 15.04.2014	
	FIC Muhammad Anwar No. 1025	Request for transfer to Mardan District Request for transfer to Investigation Staff OR Traffic	Request accepted
19.	170 170 170 170 170 170 170 170 170 170	Staff	Sent to SP Operation for
	LHC Abdul Wali No. 876		consideration
20.		Request for promotion as C-II HC	Sent to DPO/Mardan to
· · · · · · · · · · · · · · · · · · ·	HC Hassan Dad No. 305	Request for allowing service in BPS-07 as HC C-II up	consider him on merit
`21.	110 110.5301 1700 140. 505	to the age of 60 years	Filed
22.	Constable Kashif No. 3383	Request for transfer to Nowshera District	
23.	Constable Basit Ali No. 2732	Request for posting as ATS Instructor in Police Lines	Request accepted
-	Constable Said Nigar No. 920	Request for the allotment of once increment & 70 days	Request accepted
24.		pay	Filed
- 25,	Constable Muddasir Khan No. 2081	Request for transfer to Elite Force	Request accepted
26.	Constable Painda Gul No. 826	Request for the release of Pay	Sent to DSP/HQrs Mardan
27.	Constable Asset Ither M. 2265		for enquiry
28.	Constable Ayaz Khan No. 3155 Constable Farman Uddin No. 372	Request for transfer to Elite Force,	Request accepted
	Constable Saced Utlah No. 739	Request for medical aid	Approved
29.	(suspended)	Request for filing of departmental enquiry	SP Operation, Mardan for completion of enquiry
30.	Ex-PASI Iftikhar Khan	Request for re-instatement in service	Denovo enquiry conducted by
		Request for re-instatement in service	SP Operation, Mardan
31.	Ex-PASI Hussain Qadir	Request for re-instatement in service	Denovo enquiry conducted by
		recipes for re-mistatement in service	SP Operation, Mardan
32.	Ex-Constable Iftikhar Ahmad No.	Request for re-instalement in service	Keep pending
<u> </u>	364 (Band Staff)		I
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 SI
36.	En Countable Inffer Plant No. 2000		Operation, Mardan
37.	Ex-Constable Jaffar Shah No. 2699 Ex-Constable Jehanzeb No. 351	Request for re-instatement in service	Re-instated in service
38.	Ex-Constable Asif Israr No. 3205	Request for re-instatement in service	Filed Filed
39.	Ex-Constable Taimoor No. 1919	Request for re-instatement in service Request for re-instatement in service	1.1100
39.	Ex-SPO Muhammad Ali No. 302	Request for re-instatement in service Request for re-instatement in service	Keep pending
41.	Ex-Constable Aflab Alan No. 2626	Request for re-instatement in service	Absent from OR
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
	Ex-Constable Shamsul Wariseen	request for re-instancinent in service	Re-instated in service
44.	No. 1464	Request for re-instatement in service	Filed
45:	Ex-Constable Mushtag No. 1747	Request for re-instatement in service	Do instated in servi
46,	Ex-Constable Shehzad No. 1747	Request for re-instatement in service Request for re-instatement in service	Re-instated in service Re-instated in service
	Ex-Constable Muhammad Humayun	respect to re-minarchicit ill service	Re-instated in service
47.	No. 3464	Request for re-instatement in service	Re-instated in service
48.	·Ex-Driver Constable Sajjad 1105	Request for re-instalement in service	Re-instated in service

7,763 12/6/14

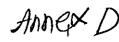
(MUHAMMAD SAEED)PSP Deputy Inspector General of Police, Mardan Region-I, Mardan.

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

(NULYMMAD SAEED)PSP
Deputy Inspector General of Police
Mardan Region-1, Mardan.

neid in this office on 12.04.2014

SAIR Out Pession



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 01.07.1991 in District Police Swabi.
- 2. That on 2003 the appellant was selected for Lower School Course & promoted as Head Constable in the year 2008.
- **3.** That in the year 2010 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 & B" 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.

ZAHIR SHAH No.629/IHC Investigation Wing PS Topi

District Swabi.

Cell No.0344-3785655.

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THIE WHILLIAM OF

DYNO!

16 96 /2

15/2014

SAIFULE

Advocate

High Court Peshawar

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POLICE DEPARTMENT.

MARDAN REGION.

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. 128	27.01.1957	05.03.1975	10 ^b /MRD	01.10.1994	Not willing for promotion as Offg: ASI for ever
	IHC Farman Ghani No. 855	07.0 2 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	1 0 ⁴ /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
	IHC Muhammad Ayaz No. 1342	09.01.1970	06.08.1991	10 th /MRD	25.07.2007	Not willing
4.	IHC Sardar Ali No. 1639	01.11.1969	26.09.1988	10 th /MRD	20.03.2010	
5.	IHC Irshad Ahmad No. 611	06.07.1972	25.09.1991	BA/NSR	20.03.2010	
6.	IHC Miraj Habib No. 676	05.02.1975	02.04.1994	10h/MRD	20.03.2010	
7.	IHC Zahir Ahmad No. 910	12.03.1974	21.09.1993	FA/MRD	20.03.2010	
8.	IHC Abdul Wahid No. 23/359	06.12.1974	15.07.1999	10º/NSR	20.09.2010	
	IHC And Wallet No. 161	04.08.1970	01.07.1991	FA/MRD	20.09.2010	1
√10.	IHC Mehboob Khan No. 1032	01.01.1970	11.04.1991	10 ⁵ /MRD	20.09.2010	
17.	IHC Muhammad Arif No. 1357	15.12.1972	13.08.1991	10 ⁶ /MRD	20.09.2010	
12	IHC Noorul Amin No. 216	02.04.1974	24.10.1995	BA/MRD	20.09.2010	
13.	IHC Gul Akbar No. 784	15.01.1970	01.12.1991	FA/SWB	20.09.2010	
14	IHC Azam Khan No. 57	16.01.1983	26.04.2005	FA/MRD	20.09.2010	
15	IHC Murad Khan No. 717	01.11.1975	10.03.1996	FA/MRD	20.09.2010	
10.	IHC Ibrar Ali No. 267	16.03.1976	26.06.1996	FA/MRD	20.09.2010	
17.	IHC Bakht ul Ayan No. 210	20.02.1977	26.06.1996	10°/MRD	20.09.2010	
18.	IHC Mukhtar Ali No. 896	01.01.1977	31.01.1995	FA/MRD	20.09.2010	
19.	IHC Mukhtar Ali No. 870	01 04 1971	22.02.1992	FA/S\VB	20.09.2010	
120.	IHC Shujat Kran No. 671 IHC Niaz Muhammad No. 154	25.12.1970	18.06.1995	FA/ MRD	20.09.2010	
21.		04.02.1972	11.07.1991	10°/MRD	20.09.2010	
22.	IHC Usman Ghani No. 1205	02.04.1970	16.08.1994	FA/SWB	20.09.2010	
23.	IHC Safdar Rehman No. 215	07.01.1970	23.04.1991	10h/SWB	20.09.2010	
24.	IHC Fazal Akbar No. 433	07.11.1971	31.12.1992	10°/MRD	20.09.2010	
.25.	IHC Safdar Igbal No. 826	03.01.1967	28.12.1986	FA/MRD	20.09,2010	
⊋ ó.	IHC Ameer Nawab No. 774		26.06.1996	FA/MRD	20.09.2010	
77	IHC Agur Shad No. 205	01.01.1971	· 01.07.1991	10 th /CHD	20.09.2010	
23.	IHC Bakhtawar Shah No. 809	24.04.1969	13.11.1998	10" NSR	20.09.2010	
29.	IHC Abdur Riaz No. 55	11.04.1974		10°/MRD	20.03.2011	
3:0.	IHC Imtiaz Ali No. 194	05 06.1975	01.09.1996	10" / NIKD		
31.	IHC Noorul Islam No. 100/782 (On deputation to PTC Hangu)	03.02.1978	25.04.15.98	10 ^a /SWB	20.03.2011	
32.	IHC Ameer Nawas Khan No. 3	€: .1.1973	08.01.1995	BA/SWB	20.03.2011	
33.	IHC Roshan Akbar No. 517	16.03.1970	10.12.1988	10°/SWB	20.03.2011	
34.		15.03.1975	17.03.1996	BA/MRD	20.03.2011	
735.		01.02.1970	01.07.1990	10MMRD	20.03.2011	
رور - ا پي و	ILC Saind Haider No. 1886	02 03 1968	20.03.1988	FA/SWB	20.03.2011	

	38. 1 IHC Wali Muhammad No. 23			`		the start
L_ ·	(On deputation to Crime Branch)	02.03.1972				·
U	HC Mazhar Ali No. 854		10.01.1794	FA/MRD	20.62.24	
	0. IHC Shafi Ullah No. 983	17.64.1977	09.06.1996		20.63.2011	
. 1	1. IHC Mushtaq Ali No. 1244	14.01.1975	28.07.1996	10h/SWB	20.03.2011	
	2 IHC Ghulam Rasool No. 878	14.05.1973	03.08.1994	FA/MRD	20.03.2011	
	Kasoo Ko Six	07.01.1971	15.03.1992	FA/MRD	20.03.2011	· · · · · · · · · · · · · · · · · · ·
V	Thursday No. 867	10.01.1972	01.07.1991	10½/MRD	20.03.3011	
4		10.03.1973	25.02.1992	10 ⁵ / MRD	20.03 2011	
46		05.02.1975		10 ⁵ /MRD	20.03.2011	
47		03.02.1974	06.03.1995	FA/MRD	20.03.2011	
		09.03.1976	12.03.1995	10 th /MRD	20.03.3011	
48		12.01.1970	21.03.1994	10 th /MRD	20.03.2011	•
49	The Court of Renman No. 1533	12.02.1971	01.07.1991	10 ^h /SWB	20.03.201	
50.	HC Alamgir No. 303		-	10°/MRD	20.03.2011	
51.	IHC Shahenshah No. 605	02.01.1977	28.01.1996	10°/MRD	20.03.2011	
52	IHC Rab Nawaz No. 744	30.03.1977	07.12.1995	FA/SWB	. 20.09.2011	
53.	IHC Mohamanday No. 974	10.06.1975	25.04.1995	10th /MRD	20.09.2011	
1/ 54.	IHC Akhtar Hussain No. 1108	20.06.1970	08.12.1988	10°/MRD	20.09.2011	
1 55	IHC Abdul Wahab No. 88	25.02.1972	20.04.1995	FA/MRD	20.09.2011	
1/56.	IHC Hashmat Khan No. 1131	12.12.1970	16.05.1994	104/SIVB	20.09.2011	
57,	IHC Sved Nasir Ahmad No. 640	20.02.1971	27.06.1991	10-75148	20.09.2011	
1/58	IHC Abdul Ghaffar No. 906	06.03.1976	. 16.11.1995	10°/MRD	20.09.2011	
V59.	IHC Amjid Iqbal No. 382	04.02.1970	29.03.1992	104/SWB *	20.09.2011	,
60.	IHC Nisar Khan No. 673	04.02.1976	15.01.1995	FA/MRD	20.09.2011	
61.	IHC Zahid Muhammad No. 1607	25.08.1974	25.06.1994	FA/MRD	20.09.2011	
62	IHC Yasin Shah No. 1225	10.05.1976	06.11.1995	FA/MRD	20.09.2011	
63.	IHC Amjid Ali No. 1104	26.08.1971	12.05.1994	FA/MRD	20.09.2011	
		30.03.1970	22.01.1995	FA/MRD	20.09.2011	
64.	IHC Nacem Khan No. 912		12.01.1773	BA/SWB	20.09.2011	
65.	IHC Jehan Dad No. 1140	11.03.1971	13.12.1994	10°/MRD		Paris III
66.	IHC Mahamata No. 1140	14.03.1971	10.04.1995		20.09.2011	Reverted to the rank of Constable vide OB: No. 640 dated 02.03,2012
67,	IHC Muhammad Jehangir No. 1355	01.04.1973	20.07.1994	FA/MRD	20.09.2011	02.03.2012 Constable vale OB: No. 640 dated
1/68.	IHC Muhammad Wisal No. 781	07.04.1973		BA/MRD	20.09.2011	
69.	IHC Faiz Muhammad No. 658	02.02.1974	01.09.1992	10 ^b /SWB	20.09.2011	
70.	IHC Ajmal Khan No. 705	17.02.1971	05.10.1994	BA/MRD	20.09.2011	
71.	IHC Sher Muhammad No. 1088	08.03.1973	13.08.1991	10°/SWB	20.09.2011	
	IHC Muhammad ILvas No. 890	04.04.1970	10.04,1995	10 ^b /MRD	20.09.2011	· · · · · · · · · · · · · · · · · · ·
72.	THC Amiid Ali No. 813		24.03.1992	105/MRD	20.09.2011	
73.	IHC Fazal Hussain No. 116	02.02.1971	29.03.1990	10°/MRD	20.09.2011	
V14.	IHC Raza Khan No. 507	20.08.1970	01.07.1990	10º/SWB	20.09.2011	
75.	IHC Ali Said No. 198	12.05.1971	01.07.1991	10 ¹ /SWB	20.09.2011	
1/6.	IHC Muhammad Nagem No. 712	04.02.1976	02.04.1997	FA/SWB	20,09,2011	
o 77.	IHC Mushtag Ahmad No. 926	12.01.1972	13.09.1991	BA/SWB	20.03.2012	
78.	IHC Aurang Zeb No. 1325	15.02.1977	14.11.1995		20.03.2012	
7,,,	IHC Atta Ur Rehman No. 156/69	13.06.1974	09.10.1994	FA/MRD	20.03.2012	
80.	IHC Said Ul Amin No. 196	15.08.1974	26.09.1994	10 ³ /MRD	20.03.201?	
1 81.	IHC Fayaz Ali No. 234	06.05.1976	26.06.1996	104/MRD	20.03.7012	
	IHC Ali Akbar No. 881	110	31.12.1996	10+/SWB	20.03.2012	
 -	IHC Fazal Daud No. 865	10.00	····4.1770	FA/MRD ·	20.03.2012	
83.	IHC Fazal Dand No.	12.02.37/	15.03.1992	FA/MPD	20.03_2012	





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1	12)
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103. HC Irikhar Shah No. 717 08.03.1978 21.04.1996 197/MRD 20.09.2012						•		F 0 8 8 3
85 III C Jurian Ala No. 58/5B 05.3; 1979 107.11759 FA/MRD 2003.2012 107.11759	84.	U.K. Fazal Khaliu No. 354	26 12 1072	1 (3.5)		_	•	
86. III C. Lanzen Khan No. 264 87. III C. Lanzen Khan No. 1504 88. III C. Lanzen Khan No. 600 89. III C. Khan Muhammad No. 102 90. III C. Khan Muhammad No. 102 90. III C. Casin Khan No. 203 91. III C. Casin Khan No. 203 91. III C. Casin Khan No. 203 92. III C. San Muhammad No. 110 93. III C. San Muhammad No. 110 94. III C. San Khan No. 200 95. III C. San Muhammad No. 110 96. III C. San Muhammad No. 110 97. III C. San Muhammad No. 110 98. III C. San Muhammad No. 110 99. III C. San Khan No. 200 99. III C. San Khan No. 200 90. III C. San Khan No. 200 90. III C. San Khan No. 200 91. III C. San Khan No. 200 92. III C. San Khan No. 200 93. III C. San Khan No. 200 94. III C. Sand Khan No. 105/29 95. III C. Sand Khan No. 105/29 96. III C. Sand Khan No. 105/29 97. III C. San Khan No. 105/20 98. III C. San Khan No. 105/20 98. III C. San Khan No. 105/20 99. III C. San Khan Muhammad No. 90 90. III C. San Khan No. 218 90. III		JHC Farhad Ali No. 58/SB				20.03.2012		· · · · · · · · · · · · · · · · · · ·
87. III Cluttus Khan No. 1584 0.00.1975 500,11798 BA/MRD 20.03.2012 88. Hirk Washif Khan No. 600 0.56.81979 0.02.1995 10°//MRD 20.03.2012 89. III K Khan Muhammad No. 112 0.20.21975 20.68.1995 10°//MRD 20.03.2012 91. III Chan Muhammad No. 122 0.00.1976 30.1976 30.00.1976 10°//MRD 20.03.2012 92. III Chan No. 203 0.00.1976 30.00.1976 30.00.1976 30.00.1976 30.00.1976 30.00.2012 93. III Chan No. 106/29 0.10.1976 60.01.1975 60.00.1975 10°//MRD 20.03.2012 94. III Chances Almand No. 1982 0.56.51973 30.11.1975 74/MRD 20.03.2012 95. III Chances Almand No. 198 0.70.21972 20.01.1976 0.00.1975 74/MRD 20.03.2012 96. III Chances Almand No. 198 0.70.21973 20.01.1976 10°//MRD 20.03.2012 97. III Chances Almand No. 198 0.70.21973 20.01.1976 10°//MRD 20.03.2012 98. III Chances Almand No. 198 0.70.21973 20.01.1976 10°//MRD 20.03.2012 97. III Chan No. 198 0.00.1976 0.00.1976 10°//MRD 20.03.2012 98. III Chan No. 198 0.00.1976 0.00.1976 10°//MRD 20.03.2012 99. III Chan No. 198 0.00.1976 0.00.1976 10°//MRD 20.03.2012 99. III Chan No. 198 0.00.1977 10.12.1888 20.03.2012 10.01.1976 10°//MRD 20.03.2012 10°//MRD 2	8n.	IHC Kameen Khan No. 264			10*/MRD	20.03.2012		
88. Hr Wayif Khan No. 600	87.	HIC Initiaz Khan No. 1584	1 06.02.1971		BA/MRD	20.03.2012		
89, III C Klain Muhammad No. 112 20.20.1975 20.61.1979 20.02.2012 90. III C Klain Muhammad No. 112 20.20.1975 20.61.1979 20.02.2012 91. III C Quim Khan No. 201 0.50.11976 20.62.1979 10.10.1978 20.02.2012 92. III C Klain Khan No. 203 0.50.11976 20.62.1979 20.02.2012 93. III C Sain Muhammad No. 1106/29 0.50.11979 20.02.2012 94. III C Anne Andrew No. 1106/29 0.50.11979 76.11	88.	IHC Wagif Khan No. 600			FA/MRD	20.03.2012	<u> </u>	
90. HIC Parco Hussain No. 822	89.	HC Khan Muhammad No. 112			10 ^h /MRD			·
91. IFIC Quality Ram No. 200	90.	IHC Faroog Hussain No. 823			FA/SWB			
92. HFC Noval Islam No. 1106/29	91.	IHC Qasim Khan No. 203		30.12.1989	10h/MRD			
93. HrC Javid Ahmad No. 1922 05.05.1973 20.03.012 94. Hr C Sari Juliann No. 1054 070.2373 20.11935 FA/MRD 20.03.2012 95. HrC Sari Juliann No. 1054 09.02.1972 20.07.1991 FA/MRD 20.03.2012 96. HrC Sari Juliann No. 1054 09.02.1972 20.07.1991 FA/MRD 20.03.2012 97. HrC Sari Juliann No. 1054 09.02.1972 20.07.1991 FA/MRD 20.03.2012 98. HrC Abhar Munin No. 208 01.01.1970 10.12.1983 10.197.100.2003.2012 99. HrC Inda Ali No. 208 01.01.1970 10.12.1983 10.197.100.2003.2012 100. HrC Sahi Julian No. 588 00.01.1974 28.07.1996 10.197.100.2003.2012 101. HrC Sahi Julian No. 588 00.01.1974 28.07.1996 10.197.100.2003.2012 102. HrC Inda Ali No. 218 00.01.1978 08.07.1978 08.01.1978 08.07.1978 08	92.	IHC Noorul Islam No. 1106/29		26.06.1996	10 / 5 WB			<u> </u>
94. III C Anese Ahmad No. 198	93.	IHC lavid Ahmad No. 1292		04.04.1995	FA/MRD			
95. IHC Saif Ullslam No. 1054 96. IHC Saif Ullslam No. 96 97. IHC Umar Hayat No. 522 100.1170 100. IHC Sahaj hubbannad No. 96 101.0197 101. IHC Umar Hayat No. 522 100.1170 102. IHC Umar Hayat No. 522 100.1170 103. IHC Abhar Munir No. 708 101.01197 103. IHC Shah munir No. 708 104. IHC Sahaj No. 522 105. IHC Umar Hayat No. 522 106. IHC Sahaj No. 528 107. IHC Umar Hayat No. 522 108. IHC Abhar Munir No. 708 109. IHC Sahaj No. 528 100. IHC Sahaj Hayat No. 522 100. IHC Sahaj Hayat No. 528 100. IHC Sahaj Hayat No. 528 100. IHC Sahaj Hayat No. 527 101. IHC Sahaj Hayat No. 527 102. IHC Hayat No. 527 103. IHC Gan Malik No. 527 104 105. IHC Hayat No. 527 105. IHC Hayat No. 528 106. IHC Avaz Ur Rehman No. 1588 115.06.1977 106. IHC Sava Saleen No. 828 124.08.1971 107. IHC Sahaj Hayat No. 158 124.08.1971 108. IHC No. 248 108. IHC Avaz Muhammad No. 166 126.1976 1276 1276 1276 1277 1287 1288 1288 1288 1288 1288 1288	94.	IHC Anees Ahmad No. 198		29.01.1995				
96. IPC Bashgi hubammad No. 96	95.	JHC Saif Ul Islam No. 1054						
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	132. IHC Fakhre Alam No. 590		} . · · ·	Section 1997 Section 1997		4
	133. IHC Wajid Ali No. 626	10.04.1977	26.01.1999	DA /A (DD	·	
	134 III IC Shah Jehan No. 186	63.01.1979	05.05.1999	BA/MRD	20.03.2013	
	V 135. IHC Niaz Muhammad No. 652	01.03.1978	02.11.1999	FA/MRD	20.03.2013	
į	136. IHC Mudassir Khan No. 447	13.04.1976	31.07.1998	FA/MRD	20.03.2013	
[156.	03.06.1977		FA/MRD	20.03.2013	
ļ	137. IHC Basar No. 1237	 	20.07,1998	FA/MRD .	20.03.2013	Restored to his animal and a
Į	138. IHC Iftikhar Ahmad No. 891	19.03.1973	19.12.1994	EA () (DD	20.03.2013	Restored to his original rank of IHC vide this office order
	139. IHC Rab Nawaz No. 381	01.02.1978	21.04.1996	FA/MRD	20.03.2013	endorsement No. 3990-91/ES dated 12.09.2013
	140. IHC Jehangir Khan No. 415	10.04.1977	17.07.1995	FA/SWB	20.03.2013	
L	141. IHC Rashid Ali No. 96	01.12.1970	01.07.1991	FA/SWB	20.03.2013	
L	142. IHC Intizar Ali No. 237	10.03.1973	13.04.1992	FA/MRD	20.03.2013	
	7.11110. 257	01.02.1976	05.12.1994	FA/SWB	20.03.2013	
		:		FA/MRD	20.03.2013	
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Dated Mardan the

AD 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.

BEFORE THE COURT OF SCOVICE TRIBUNAL K.P.R. PESHAWAX. of 2014 Zohio Shah Head constable. (Accused/Petitioner) (Appellant) **VERSUS** inspector Greneral of police K. P.K. (Respondent) Peshawar aund others. 1/ We Zahix Rhah Head constable In the above noted MPeal do hereby appoint and constitute Mr. Khan Akbar Khan and Mr. Saif Ullah Mohmand Advocates as my/ our Counsels in the subject proceedings and authorize them 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 my/our expense and receive all sums and amounts payable to me/ us and to all such acts which he may deem necessary for protecting my/ our interest in the matter. They are also authorized to file Appeal, Revision, Application for restoration or application for setting asiding exparte

(Client)

Dated: -/2014

(KHAN AKBAR KHAN)

K-ADZ

decree proceedings on my/ our behalf.

Cell No. 0344-91

(Saif Uttal Mohmand)

Advocates High Courts

Peshawar.

Cell No. 0321-9117280

Office Address: -B-107, 2nd floor, Town Tower Jahangir Abad, University Road,

Peshawar.