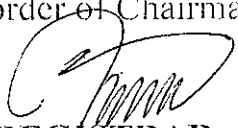


FORM OF ORDER SHEET

Court of _____

Appeal No. 648/2024

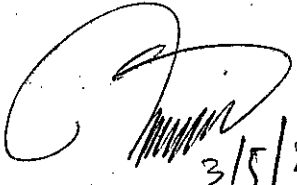
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/05/2024	<p>The appeal of Mr. Zainullah refiled today by registered post through Mr. Muhammad Naveed Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____ . Counsel for the appellant has been informed telephonically .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Zain Ullah received today i.e on 02.05.2024 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 3 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Annexures-C, E, F & G of the appeal are illegible which may be replaced by legible/better one.

No. 1049 /S.T,

Dt. 3-5 /2024.


3/5/24
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


Mr. Muhammad Naved Adv.
S.C of Pakistan at D.I.Khan

R/Sir,

The deficiencies have been reposed and un-necessary party has also been deleted from the array of respondents. Similarly, illegible annexures have been accompanied with better copies.

Re-submitted please - Today on - 05-2024

Registrar
Service Tribunal
KPK Peshawar.


Mr. Muhammad Naved
Adv. S.C of Pakistan
at DIKhan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR, CAMP DERA ISMAIL KHAN.

Service Appeal No. 648 /2024

Zain Ullah
(Appellant)

VERSUS

Regional Police Officer etc
(Respondents)

Service Appeal
INDEX

S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit along with C.M		1 - 8
2.	Copy of CNIC of the appellant	A	9
3.	Copies of absorption order; medical certificate and service roll	B	10 - 14
4.	Copy of the impugned order dated 19/04/2023	C	15
5.	Copy of Departmental Appeal	D	16
6.	Copies of impugn order dated 19/10/2023 of appellate authority	E	17
7.	Copies of list dated 14/03/2023 and list dated 18/09/2022	F & G	18 - 19
8.	Copy of note dated NIL	H	20
9.	Vakalatnama	--	21

Dated 30/04/2024

Your humble appellant


Zain Ullah

Through counsel


Muhammad Naveed
 Advocate Supreme Court.

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR, CAMP**DIKHAN.**Service Appeal No. 648/2024

Zain Ullah Ex-Constable Belt No **4014**, District Police South Waziristan upper. (Son of Hukamran Caste Mehsud R/o P/O Khana Tayarza, Khasoria Tehsil Tayarza District South Waziristan).

(APPELLANT)**VERSUS**

1. **Regional Police Officer, Dera Ismail Khan.**
2. **District Police Officer, SWTD (South Waziristan Tribal District).**
3. **The Inspector General Of Police of KPK, Peshawar.**

(RESPONDENTS)

SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER NO. 932 DATED SWTD THE 19/04/2023; WHEREBY THE APPELLANT HAS BEEN AWARDED MAJOR PUNISHMENTS OF DISMISSAL FROM SERVICE AND AGAINST THE IMPUGNED ORDER OF APPELLATE AUTHORITY NO. 8222/ES DATED 19/10/2023, WHEREBY APPEAL OF THE APPELLANT WAS REJECTED.

Note: Addresses given above shall suffice the object of service.

Respectfully Sheweth;

1. That before the inflection of punishment and impugned order, the appellant, "Constable Zain Ullah No. 4014" had been serving under the domain of District Police Officer SWTD (South Waziristan Tribal District) since 2020 and since before as Khasadar. Copy of CNIC of appellant is annexed as **Annexure-A** and copies of absorption order; medical certificate and service roll are all annexed as **Annexure-B**.

*Stand
detested* (3)

M. Q. Khan

2. That appellant hails from very poor family and being only sole earner of the family had been in hardships when from the month of August 2022, the father of the appellant became seriously ill. Appellant had to look after him but even then left no stone unturned to perform his duties regularly and punctually and the superiors were satisfied from the appellant. As on those days the appellant was to remain on leave, sometimes for two or three days due his father illness. But unfortunately appellant's father lost his breath in those days. In the month of September 2022, some officials including the appellant were selected for training well in time at PTS Shakas but that was not in the knowledge of appellant. Appellant had informed his concern superiors about the situation well in time. But even then the appellant was awarded major punishment of dismissal from service vide impugned order No. 932 dated 19/04/2023. Copy of the impugned order dated 19/04/2023 is annexed as **Annexure-C.**

3. That, appellant was not communicated with the impugned order No. 932 of competent authority and after receiving the said impugned order, the appellant preferred a departmental appeal against the impugned order dated 19/04/2023 to the appellate authority on 28/08/2023. Though, the appellant had been pursuing his appeal but every time he was told to keep waiting till the decision of the appeal. The appellate Authority, on the other hand, had already decided the departmental appeal of the appellant vide the impugned appellate authority No. 8222/ES dated 19/10/2023 but the same was not communicated to the appellant. The appellant received the impugned order of appellate authority on 01/04/2024. Copies of the departmental appeal and impugned order dated 19/10/2023 are annexed as **Annexure D & E.**

4. That appellant being aggrieved from impugned office order No. 923 Dated 19/04/2023 and impugned order of the appellate authority dated 19/10/2023, has a right and cause of action to file the instant service appeal before this Honourable KP Service Tribunal, inter alia, on the following grounds.

GROUNDS

- a. That impugned orders of both the competent and appellate authority are against law, facts and service rules, void and are sheer violation of **Government Servant (E&D) rules 2011**. The appellant is entitled to be reinstated in his service. Hence, the impugned orders are liable to be set aside.
- b. That the Appellant has been subjected to injustice and the case of Appellant has not been dealt with under the principle of fair trial.
- c. That no proper/formal inquiry was conducted and awarded major punishment of dismissal from service to the appellant. Similarly, no final show cause notice was issued to the appellant before inflection of major punishment. The fact is evident from the impugned order.
- d. That as the appellant had already informed his superiors concern about the non-joining of training **well in time** and that too due to unavoidable reasons. Relaxation was also extended from the superiors to the appellant. That's why on 14/03/2023, list of those delinquent officials was issued who did not join the training and recommendations were issued to issue charge sheet to those officials. Name of the appellant was not included in that list. Because the only allegation against the appellant was that he could not join the training **well in time**. Meaning thereby, that requests of the appellant were conceded and his name was struck off from the list issued on 18/09/2022. Copies of list dated 14/03/2023 and list dated 18/09/2022 are annexed as **Annexure F & G** respectively.
- e. That without affording an opportunity of defending the case or of any of the alleged allegations, initially the appellant was orally informed that he has been dismissed from service by the DPO, SWTD and was given a note dated Nil containing punishment of dismissal signed by DPO, SWTD. Copy of note dated NIL is annexed as **Annexure H.** Subsequently formal impugned order No. 932 was issued but was not communicated to the appellant.

- f. That no charge sheet or any show cause notice and statement of allegations were ever issued or communicated to the appellant and the appellant has been awarded a major punishment of dismissal from service ex-parte.
- g. That appellant belongs to a very poor family and is lone earner of his entire family and from the month of August 2022, the father of the appellant became very ill. Appellant had to look after him but even than let no stone under to perform his duties regularly and punctually and the superiors were satisfied from the appellant. As on those days the appellant was to remain on leave, sometimes for two or three days due his father illness. In the month of September 2022, some officials including the appellant were Selected for training at PTS Shakas but that was not in the knowledge of appellant. Appellant had informed his concern superiors about the situation well in time. But even than the appellant was awarded major punishment of dismissal from service vide impugned order No. 932 dated 19/04/2023.
- h. That the appellate Authority/Respondent No. 3 has rejected the departmental appeal of appellant without following codal formalities and without following the procedure, issued the impugned order. No 932 dated 19/10/2023
- i. That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

In wake of submission made above the appeal of the appellant may kindly be accepted and impugned order no. 932 dated SWTD the 19/04/2023 and impugned order of Appellate Authority No. 8222/ES dated 19/10/2023 may kindly be declared as against law and justice and may kindly be set aside.

The appellant may kindly be reinstated into service with all back benefits.

Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

Dated 30/04/2024


Your humble appellant

Zain ullah

Through counsel


Muhammad Naveed
Advocate Supreme Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR, CAMP DERA ISMAIL KHAN.

Service Appeal No. _____/2024

Zain Ullah
(Appellant)

VERSUS

Regional Police Officer etc
(Respondents)

Service Appeal

CERTIFICATE

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.

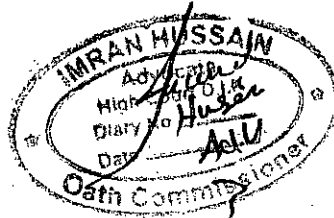
Dated 30.04.2024


 Appellant

AFFIDAVIT

I, **Zain Ullah**, appellant herein, do hereby solemnly affirm on oath that all para-wise contents of the appeal are true and correct to the best of my knowledge, belief and information and nothing has been deliberately concealed from this Worthy Service Tribunal, nor anything contained therein, based on exaggeration or distortion of facts.

Dated 30.04.2024




DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR, CAMP DERA ISMAIL KHAN.

Service Appeal No. _____/2024

Zain Ullah
(Appellant)

VERSUS

Regional Police Officer etc
(Respondents)

Service Appeal

ADDRESSES OF THE PARTIES

Appellant:-

Zain Ullah Ex-Constable Belt No **4014**, District Police South Waziristan upper. (Son of Hukamran Caste Mehsood R/o P/O Khana Tayarza, Khasoria Tehsil Tayarza District South Waziristan).

RESPONDENTS:-

- 1. Regional Police Officer, Dera Ismail Khan.**
- 2. District Police Officer, SWTD (South Waziristan Tribble District).**
- 3. The Inspector General Of Police of KPK, Peshawar.**

Dated 30.04.2024


Appellant's Counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR, CAMP DERA ISMAIL KHAN.

Service Appeal No. _____/2024

Zain Ullah
(Appellant)

VERSUS

Regional Police Officer etc
(Respondents)

Service Appeal

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth;-

1. That the above titled service appeal is being filed before this Honourable Service Tribunal and the contents of appeal may kindly be considered as integral part of instant application.
2. That, after filling of departmental appeal against impugned order of the competent authority, the appellant has been pursuing his appeal, although the appellant got sever attack of bells palsy. On several visits to the office of appellate authority, the appellant, was always directed to keep waiting till the decision of departmental appeal. Astonishingly, when copy of the decision of the appellate authority was received to the appellant on 01/04/2024, which bears the dates as 09/10/2023.
3. The order of the appellate Authority was not communicated, neither by the office of the appellate authority, nor of District Police officer.
4. That the only allegation upon the appellant is that he could not join the training school **well in time.** Conversely, a harsh punishment has been awarded to the appellant. The appellant has a very good case on merit and the valuable rights are involved. Hence, the delay may kindly be condoned.

8

5. That, this Worthy Service Tribunal has vast and ample power to accept the instant application.

In view of above circumstances, it is respectfully prayed that the delay, if found any, may kindly be condoned in the interest of justice and the case in hand may kindly be decided on merits.

Dated 30 /04/2024

Zain Ullah
Your humble applicant

Zain Ullah

Through counsel

Muhammad Naveed
Muhammad Naveed
Advocate Supreme Court

AFFIDAVIT

I, **Zain Ullah**, applicant herein, do hereby solemnly affirm on oath that all para-wise contents of the application are true and correct to the best of my knowledge, belief and information and nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.



Zain Ullah
DEPONENT

Ann-A

9

PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: Zain Ullah

Father Name: Hukamman

Gender: M Country of Stay: Pakistan

Identity Number: 21706-322269-3 Date of Birth: 01-01-1987

Date of Issue: 01-04-2023 Date of Expiry: 01-04-2033

04511

Holder's Signature

موجودہ پتہ: ڈاک خانہ تیارزہ، ضلع
تیارزہ، وزیرستان

21706-322269-3

مستقبل پتہ: ڈاک خانہ تیارزہ، ضلع
تیارزہ، وزیرستان

10165125825

Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

10

6. CHARACTER ROLL OF APPOINTMENTS, PROMOTIONS, REDUCTIONS DISCHARGES ETC. (Contd)

1	2	3	4	5
Appointment, promoted, suspended, reduced, discharged, dismissed, resigned or died.	To what grade and pay appointed, promoted or reduced.	Date	No. Of District Order	Full signature superintende: of Police
<p style="text-align: center;">ABSORPTION ORDER</p> <p>Absorb from Massadur force P/S. of ... 1946 Massadur P/S. into Police district as Constable P/S 7 Mid. Grade. of P/S. ... No 50 police HD/SMY 2019 Merged area 1048:1057 dated 27.7.2020, and his pay fixed Rs : 10990. P.M. H.P. - 01-01-2020 DISTRICT ... SWTD</p>				

Annex B

7. TRANSFERS BEYOND THE DISTRICT

1	2	3	4
Date	From	To	Authority of transfer

MEDICAL CERTIFICATE

#94
P-2

11

Name of Official Zain Ullah
 Post or Place Mehand
 Father's Name Hu Kauran
 Residence Khaso ya Tehsil Tera 79 SWTD
 Date of Birth 1987 NIC No. 2706 322 2269-3
 Height 5' 10"
 Physical marks of Identification Nil
 Signature of the Official [Signature]
 Signature [Signature]
 Date of Issue [Blank]

I do hereby certify that I have examined Zain Ullah
 at DPD SWTD in DPD
 and certify that he has no direct, communicable or other constitutional affection or bodily
 infirmity Nil which would render him unfit for employment
 in the office of the DPD SWTD
 He is 33 years of age and his date of birth is 1987 year and he appears to be
 clear 33 years

DO NOT WRITE BELOW THIS LINE

[Signature]
 Medical Superintendent
 O.H.Q Hospital District Tera

CHARACTER AND SERVICE ROLL OF
CONSTABULARY NO. () in

DISTRICT

12

1	Name	Father's Name	Tribe or Caste	Village or Town	Post and telegraph office	Police Station	District	Province	Date of Birth	Height	Chest Measurement	Date of Enrolment	Age on enrolment	Distinctive Marks
	Zamin Mulla	Ahmed Khan	Mulsand	Beharwan	Ta. P. P.	Sarwan	S. P. D.	R. P. K.	01-01-1907	5-0	34 x 35 1/2	01-01-1920	12	None

2 Verification Roll No. Dated Received back and attached to the Fauji misal

3 Government Service prior to present employment, which is approved for pension service.

Service or Department	Rank or Grade	Pay of last appointment	From	To	Period		
					Years	Month	Days

4. Cause of and character on discharge from above service Reference to orders approving above service for pension service in the Police Department.

Agreement - I understand that I have been appointed under section 7 of the Police Act (V of 1851), and the purpose of the Section and the provision of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed have been explained to me. I agree to serve faithfully under the provision of the said Police Act and to obey all lawful orders issued to me by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a certificate of appointment issued under section 8 of the Police Act (V of 1851).

District Police Officer
SWTD

Signature

Date

5. Rolled impression of fingers and thumb of left hand.

Left Little	Left Ring	Left Middle	Left Index	left Thumb

B. NAME OF RELATIVES IN GOVERNMENT SERVICE

1	2	3	4
Name	Relationship	Nature of employ	District

9. NAME RESIDENCE AND OTHER PARTICULARS OF HEIRS:

Wife: *Fatima B B*

Father: *Hakim Khan*

Mother: *Roqia B B*

Brother: *Bakht Khan*

Sister: *Munira B B*

Note: Under line in red ink their nominated (with not more than two alternative) and fill in name and particulars necessary to trace.

14

CHARACTER ROLL OF

10. EDUCATIONAL QUALIFICATIONS

(Continued)

Educational Qualification	Knowledge of Language
Un-Educated	English
Slightly Educated	Persian
Matriculation	Urdu
First Arts	Punjabi
Degree	Pashto

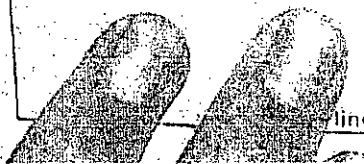
Middle

District Police Office

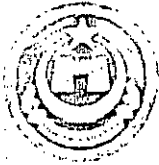
Note: Under line the qualifications possessed, and particulars where necessary and give date of entry

11. PROFESSIONAL ATTAINMENTS AND SPECIAL QUALIFICATIONS:

Professional attainments:	Special Qualification
Passed Training School Upper Class:	Clerical duties.
Intermediate Class	Accounts duties.
Lower Course	Orderly Head Constable's duties.
Finger Print Course	Moharrir's Duties.
Drill Instructor's Course	Detectives Duties.
	Traffic Duties.



Prosecuting Inspectors Examinations, line course passed and qualifications possessed.



OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.

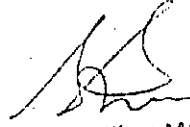
No. 932 Dated SWTD the 19/04 2023.

Order announced

My order will dispose of departmental enquiry against Constable Zian Ullah No. 4014 of this District Police SWTD on the allegation that you were selected for training at PTS Shakas vides this office letter No. 10367 dated, 18-09-2022. But he hardly failed to report at training Centre will in time. For which he was properly charge sheeted. The Fazal - E Subhan SP Investigation unit SWTD was nominated as inquiry officer. The enquiry was conducted, the alleged official did not join the departmental enquiry intentionally. Subsequently, the enquiry officer has submitted finding report stating therein that during enquiry all possible resources are utilized to ensure the joining for Personnel hearing of alleged official but he failed to appear before me. The enquiry Officer recommended for Major punishment against the said official.

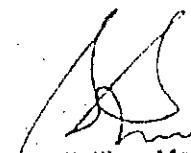
After the perusal finding report, and other relevant materials placed before me, I, MR. SHABIR HUSSAIN KHAN MARWAT DISTRICT POLICE OFFICER, SWTD being competent Authority vested in me under Khyber Pakhtunkhwa Police Rules 1975 amended 2014 hereby awards to Major Punishment of Dismissal From Service to the defaulter Constable Zian Ullah No. 4014 with immediate effect.

Order announced


(Shabir Hussain Khan Marwat)
District Police Officer
SWTD

Copy 933-35

- Copy of above is submitted to the:-
1. The Regional Police officer, Dera Ismail Khan Region.
 2. All Concerned.


(Shabir Hussain Khan Marwat)
District Police Officer
SWTD

بخدمت وقت جناب RPO صاحب ڈیوہ اسماعیل خان ریجن ڈیوہ اپنی خدمت

درخواست بمراد نوکری پر دوبارہ بحالی

عنوان:

جناب عالی!

مودبانہ گزارش کی جاتی ہے کہ من سائل ڈسٹرکٹ پولیس جنوبی وزیرستان اپریس بطور کنسٹیبل تعینات تھا۔

جو کہ انتہائی ایمانداری کے ساتھ اپنی ڈیوٹی سرانجام دے رہا تھا۔ افسران بالا کو شکایت کا کوئی موقع نہیں دیا۔

تقریباً تین ماہ قبل سائل کو ٹریننگ کیلئے منتخب کیا۔ لیکن بد قسمتی سے اس وقت سائل کو بروقت اطلاع نہ دی گئی۔

اس وقت سائل کے والد کو ہارٹ اٹیک ہوا تھا۔ جس کی وجہ سے اس کو پشاور لے جا کر ہسپتال میں داخل کیا گیا۔

بعد میں ہارٹ آٹیک کی وجہ سے وفات پا گیا۔ والد کی وفات کے فوراً بعد سائل پر فالج کا ایک ہوا۔ جس کی وجہ سے

سائل محکمہ ہذا کو اطلاع نہ دے سکا۔ جو بعد میں سائل کی عرض و معروض سے بغیر محکمہ ہذا سے درخواست کی گئی۔

کیا۔

جناب والا: سائل ایک غریب خاندان سے تعلق رکھتا ہے۔ اس نوکری کے علاوہ کوئی ذریعہ معاش نہیں ہے۔

لہذا استدعا کی جاتی ہے کہ درجہ بالا حالات و قحط کو مد نظر رکھتے ہوئے سائل کو دوبارہ اپنی سرکاری نوکری بحال

کرنے کا حکم صادر فرما کر مشکور فرماویں۔ سائل انجناب کیلئے تاحیات دعا گو رہونگا۔

عین نوازش ہوگی

ارضی

سورہ 28/08/023

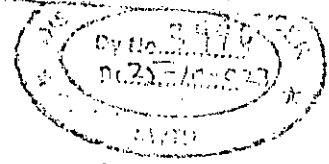
سائل: کنسٹیبل: زین اللہ بیل نمبر 4014! شرکٹ پولیس جنوبی وزیرستان

زین اللہ

سولہ نمبر 033-2624200

OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

☎ 0966-9280291 Fax # 9280290
dated D.I.Khan the



17

Annexure 'E'

No. 1027 /ES
OR DER

1. This order disposes off departmental appeal filed by Ex-Constable Zain Ullah No. 4014 of District Police SWTD has passed against the order of Major Punishment of (Dismissal from Service) by the DPO SWTD vide his office Order No.932 dated 19.04.2023 on the following allegations:

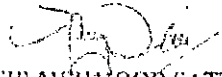
2. "He was selected for training at PTS Shakas vides this office letter No 10367 dated 18.09.2022. But he badly failed to report at training center will in time".
3. "He was absent from law full duty without prior permission/ approval from the high ups."
4. DPO SWTD served the appellant with the charge sheet. Enquiry into the matter was not conducted into through Mr. Fazal Subhan SP Investigation SWTD who in his finding report, stated that all possible resources were utilized to ensure the joining for personal hearing but he failed to appear before him. The inquiry officer has recommended for Major Punishment.

4. Hence, the appellant was awarded Major Punishment of "Dismissal from Service" by the DPO SWTD, vide his office Order No.932 dated 19.04.2023.

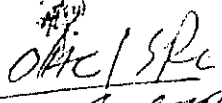
5. Period of the service record of the applicant and comments received from DPO SW Upper the appellant badly time barred.


6. Keeping in view the above, I, NASIR MEHMOOD SATTI, PSP, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (a), of the Police Rules 1975; do not intend to take a lenient view, therefore, **REJECT** his appeal being time barred and uphold the order of Major Punishment of "Dismissal from Service" passed by District Police Officer SWTD vide Order No.932 dated 19.04.2023

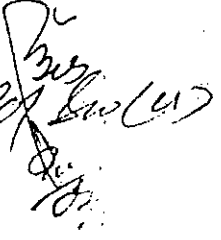
7. Order Announce


(NASIR MEHMOOD SATTI) PSP
Regional Police Officer
Dera Ismail Khan

Copy of above is sent to the DPO SW Upper with reference to his office letter No. 1484 ES dated 23.08.2023 (incl. Service Roll & Fanni Missal)


Inform to Concerned


(NASIR MEHMOOD SATTI) PSP
Regional Police Officer
Dera Ismail Khan


DPO SW Upper

سجانب - SINTO SP/INV

مقررین کے نام و تاریخ

مقررین کے نام و تاریخ

ذیل مقررین کو مزید سہولتیں دینے کے لیے درخواست کی گئی ہے کہ ان کی سہولتیں جلد سے جلد کی جائیں۔

آئی فائی آر کے تحت مقررین کی سہولتیں دینے کے لیے درخواست کی گئی ہے کہ ان کی سہولتیں جلد سے جلد کی جائیں۔

3304 فروری 2014

16 - رقم 3367

17 - رقم 3372

18 - رقم 3105

19 - رقم 2054

20 - رقم 2013

21 - رقم 2701

22 - رقم 2012

23 - رقم 2011

24 - رقم 2010

2 - سرور خان 2114

3 - شہباز 2035

4 - شہباز 1957

5 - شہباز 1936

6 - شہباز 1865

7 - شہباز 1641

8 - شہباز 1715

9 - شہباز 2131

10 - شہباز 2205

11 - شہباز 2215

12 - شہباز 2124

13 - شہباز 2814

14 - شہباز 2754

15 - شہباز 1454

SP/INV - SINTO
14-03-13

نوٹ: رقم 3367 کے مقررین کی سہولتیں دینے کے لیے درخواست کی گئی ہے کہ ان کی سہولتیں جلد سے جلد کی جائیں۔

Basic Training Not Reported PTS Shakas

Sl. No.	Name	Age	Training
1	Under Training P...
2	Under Training P...
3	Under Training P...
4	Under Training P...
5	Under Training P...
6	Under Training P...
7	Under Training P...
8	Under Training P...
9	Under Training P...
10	Under Training P...
11	Under Training P...
12	Under Training P...
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14	Under Training P...
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16	Under Training P...
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37	Under Training P...
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43	Under Training P...
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45	Under Training P...
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93	Under Training P...
94	Under Training P...
95	Under Training P...
96	Under Training P...
97	Under Training P...
98	Under Training P...
99	Under Training P...
100	Under Training P...

دوش ...

DPolice
 2372

Serial No.

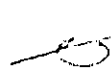
15. CENSURES AND PUNISHMENT

Chargesheet.

You have been selected
for training at PTB Shalimar
office letter NO= 10367 dated,
18, 09. 2022.

Punishment:

I, SHABIR Hussain Khan
Magistrate hereby awards to Major
Punishment of Dismissal from
Service.


DPO / SWTD
District Police Officer
SWTD



MUHAMMAD NAVEED
Advocate Supreme Court of Pakistan
12101-0955614-5

وکالت

LIFE MEMBER ABID SHAHID ZURESI President
MUNOUIR AKHTAR SHABIR Secretary

کورٹ
فیس

جناب جسٹس مخدوم خواجہ سعید گل ٹریبونل لہور کی عدالت کے ذریعہ ارسال کیا گیا

مجاہد ایبٹ آباد
نام رجسٹرڈ پولیس آفیسر وغیرہ
زمین آشر

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

سروس ایبل
باعث تحریر آنکہ

مقدمہ مقدمہ بالا اذعان میں اپنی طرف سے درخواستی وجوہات دیئے جوشی یا تھیں مقدمہ بنام D. I. Khay
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہونا رہوں گا اور ہر وقت نکالے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل
بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے
پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ
کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اساتے ذمہ
نظر ثانی اپنی گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثانی یا راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے
تاریخ پیشی مقدمہ مذکور بیرون از پکھری صدر بیرونی مقدمہ مزکور نظر ثانی ایبل و گمرانی و برآمدگی مقدمہ یا منوشی ذمہ دار ایک طرف یا درخواست حکم اختتامی یا ترقی
یا گمرانی میں از فیصلہ اجراء ذمہ دار بھی صاحب موصوف کو بشرط ادا ایبل علیہ حقہ میری کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مثل کردہ
از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مزکورہ یا اس کے کسی جزوی کارروائی یا بصورت درخواست نظر ثانی
ایبل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا ہیر مٹر کو اپنے جہانے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے
اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانب التوا ہرے گا وہ صاحب موصوف کا حق ہو گا مگر
صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پوری نہ کریں اور ایسی صورت
میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سزور ہے
موری 30 مارچ 2024

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

زمین آشر
ایبٹ آباد

Amr Patel
Name
M

زمین آشر