


FORM OF ORDER SHEET

Court of _____

Appeal No. 664/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/05/2024	<p>The appeal of Mr. Qismat Khan presented today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 20.05.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 664 /2024

Qismat Khan Sub Inspector

VERSUS

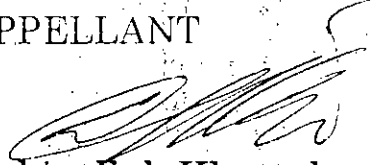
Provincial Police Officer Khyber Pakhtunkwha
Peshawar & others

INDEX

S#	Description of Documents	Annexure	Pages
1.	Grounds of Petition.		1-6
2.	Affidavit.		7
3.	Addresses of parties		8
4.	Condonation of delay		9-10
5.	Copy of promotion order	"A"	11
6.	Copy of promotion order dated 23.12.2016	"B"	12-13
7.	Copy of regularization order	"C"	14
8.	Copy of impugned confirmation order	"D"	15-16
9.	Copy of departmental appeal	"E"	17-18
10.	Wakalatnama		19

Through

APPELLANT


Kabirullah Khattak
Advocate, High Court
Peshawar.

Dated: 16/05/2024

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 664 /2024

Qismat Khan Sub Inspector presently Posted at CTD
District Karak.

Appellant

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa
Peshawar.
2. Regional Police Officer Kohat Region Kohat.

Respondents

SERVICE APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED
CONFIRMATION ORDER DATED 09/07/2021
WHEREBY THE APPELLANT WAS
CONFIRMED FROM OFFICIATING ASI TO
ASI AGAINST WHICH THE APPELLANT
SUBMITTED DEPARTMENTAL APPEAL ON
05.01.2024 WHICH WAS NOT DECIDED
WITHIN THE STATUTORY PERIOD.

PRAYER:-

ON ACCEPTANCE OF THIS APPEAL THE
IMPUGNED ORDERS DATED 09.07.2021 TO
THE EXTENT OF THE APPELLANT MAY
KINDLY BE SET ASIDE AND HE MAY KINDLY
BE CONFIRMED ASI W.E.F 2013 ALONG WITH
ALL BACK BENEFITS INSTEAD OF 2021.

ANY OTHER RELIEF DEEMED APPROPRIATE
IN THE CIRCUMSTANCES OF THE CASE NOT
SPECIFICALLY ASKED FOR, MAY ALSO BE
GRANTED TO THE APPELLANT.

Respectfully Sheweth,

1. That the appellant was initially appointed as constable on 28.11.1995 with respondent department and after appointment he performed his duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
2. That due to unblemished record the appellant was promoted to the rank of Head Constable on 10.03.2008 and the name of appellant was brought in promotion list "D", later on he was promoted to the rank of ASI on Ad-hoc / officiating basis vide order dated 13.07.2011. (Copy of promotion order is attached as annexure "A").
3. That although the appellant was promoted as officiating ASI at the year 2011 but the respondent departments once again issued the promotion order of the appellant on Ad-hoc basis as officiating ASI on 23.12.2016. (Copy of promotion order dated 23.12.2016 is attached as annexure "B").

4. That the appellant was regularized on 21.02.2019 by the respondent department. (Copy of regularization order is attached as annexure "C").
5. After that the impugned order was passed against the appellant whereby the appellant was confirmed in the rank of ASI on 09.07.2021 instead of 2013. (Copy of impugned confirmation order is attached as annexure "D").
6. That the appellant departmental appeal against the impugned order dated 09.07.2021 on 05.01.2024 which was not decided within the statutory period. (Copy of departmental appeal is attached as annexure "E").
7. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That the respondent department has not been treated the appellant in accordance with law

and rules on the subject and acted in violation of article 4 & 25 of the Constitution of Islamic Republic of Pakistan 1973 which is injustice, unfair hence not sustainable in the eyes of law.

B. That the appellant has not been treated in accordance with law and rules, hence his rights secured and granted under the constitution of Islamic Republic of Pakistan 1973 were badly violated.

C. That the action and inaction of respondent is against the law, rules and policy which is not sustainable and liable to be stuck down.

D. That there is no illegality on part of the appellant and it is a well settle principal of law and judgment of superior courts that no one can be punished/penalized on fault of the departments/others.

E. That non confirmation of the appellant on due date i.e 13.07.2013 slackness on the part of respondents. By virtue of the continuously availing the promotion without any adverse entry in the service record, of the appellant was entitled for confirmation with effect from 13.07.2013.

F. That confirmation means continuously or retention against a post on permanent basis. Appellant continuously availed promotion in the rank of ASI and the record of appellant was satisfactory during probation period. Therefore appellant was entitled for confirmation on 13.07.2013 after completion successful two years probation period.

G. That the promotion order dated 13.07.2011 of the appellant was passed according to law and rules.

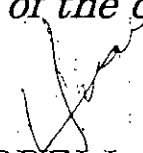
H. That the issue of different promotion order of appellant in the same rank by the respondents reveals that the appellant was not treated in accordance with law and rules.

I. That any other ground not raised here may graciously be allowed to be raised at the time of arguments on the instant service appeal.

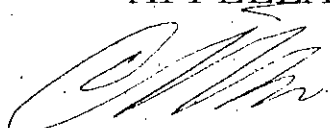

It is therefore, most humbly prayed that on acceptance of this appeal the impugned orders dated 09.07.2021 to the extent of the appellant may kindly be set aside and he may kindly be confirmed ASI w.e.f 2013 along with all back benefits instead of 2021.

(6)

*Any other relief not specifically asked for
may also graciously be extended in favour of the
Appellant in the circumstances of the case.*


APPELLANT

Through


Kabir Ullah Khattak
& 
Roeda Khan
Advocates, High Court
Peshawar.

Dated: 16/05/2024

7

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

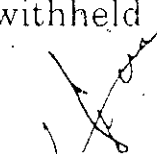
Qismat Khan Sub Inspector

VERSUS


**Provincial Police Officer Khyber Pakhtunkwha Peshawar &
others**

AFFIDAVIT

I, Qismat Khan Sub Inspector presently Posted at
CTD District Karak, do hereby solemnly affirm and
declare that all the contents of the **instant appeal** are true
and correct to the best of my knowledge and belief and
nothing has been concealed or withheld from this Hon'ble
Court.


DEPONENT

Identified by:


Roeda Khan
Advocate High Court
Peshawar.

(2)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

Qismat Khan Sub Inspector

VERSUS

Provincial Police Officer Khyber Pakhtunkwha
Peshawar & others

ADDRESSES OF PARTIES

PETITIONER.

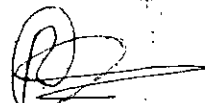
Qismat Khan Sub Inspector presently Posted at CTD
District Karak.

ADDRESSES OF RESPONDENTS

1. Provincial Police Officer Khyber Pakhtunkwha
Peshawar.
2. Regional Police Officer Kohat Region Kohat.

Through

APPELLANT


Roeda Khan
Advocate, High Court
Peshawar.

Dated: 16/05/2024

(9)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

Qismat Khan Sub Inspector

VERSUS

Provincial Police Officer Khyber Pakhtunkwha Peshawar &
others

APPLICATION FOR CONDONATION OF DELAY (if any)

Respectfully Sheweth,

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.

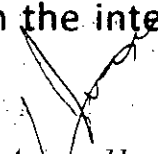
Grounds:

- A. That all the grounds of the appeal may kindly be considered for integral part of the instant application.
- B. That the impugned order is void order and no limitation run against the void order.
- C. That there are number of precedents of the Supreme Court of Pakistan which provides that

the cases shall be decided on merits rather than technicalities.


- d. That the dispute of the appellant is come under the definition of recurrence cause of action and as per judgment of superior courts no limitation of run against such issue.

It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.

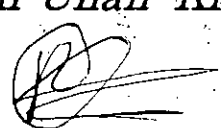

Appellant

Through

Date: 16.05.2024


Kabir Ullah Khattak

&


Roeda Khan

Advocates, High Court

Peshawar

(11)



POLICE DEPARTMENT

ORDER

In the light of Provincial Police Officer Khyber Pakhtunkhwa Peshawar Memo: No.15512/E-II, dated 07.07.2011, Memo No 15527/E-II, dated 07.07.2011 and Memo. No.581/E-II, dated 08.07.2011 the following Police personals of Karak & Hangu District are hereby promoted on Adhoc basis under standing order No.6/2008.

S.No.	Rank & Name	Promoted
1.	ASI Aleem Khan	As Offg: SI
2.	HC Hakim Shah	AS Offg: ASI
3.	HC Qismat Khan	AS Offg: ASI
4.	Const: Afsar Ali	AS Head Constable
5.	Const: Noor Shahzad	As Head Constable

AS/SRE

[Handwritten signature]
14/7/2011

03-212
14-07-2011 (M.MASOOD KHAN AFRIDI)PSP.
Dy: Inspector General of Police,
Kohat Region, Kohat.

No. 6159-62 /EC, dated Kohat the 13/07 /2011.

Copy of above for information and necessary action to the -

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar w/r to his Memo: No. quoted above.
2. District Police Officer, Hangu w/r PPO KPK Peshawar Memo No 15527/E-II, dated 07.07.2011. Copy enclosed.
3. District Police Officer, Karak w/r PPO KPK Peshawar Memo No 15512/E-II, dated 07.07.2011, and Memo. No.15581/E-II, dated 08.07.2011, Copies enclosed
5. Asstt: Secret Region Office, Kohat

[Handwritten signature]
(M.MASOOD KHAN AFRIDI)PSP
Dy: Inspector General of Police,
Kohat Region, Kohat.

ORDER.

In compliance with the directions contained in the CPO Peshawar Letter No. 4555-61/E-III, dated 02.12.2016 and following the subsequent approval of the Inspector General of Police, Khyber Pakhtunkhwa Peshawar vide No. 4859/E-III, dated 22.12.2016 of the recommendation of the Regional Departmental Promotion Committee held on 08.12.2016 in the office of the undersigned, the following Head Constables on list "D" of Kohat Region are hereby promoted to the rank of Assistant Sub-Inspector on Adhoc basis subject to conditions listed below:-

- The promotion shall be purely temporary.
- They shall be liable for reversion to the original rank of HC at any time.
- They shall not challenge their reversion or claim seniority as well as any benefit on the basis of Adhoc promotion before any forum including courts.
- The period served on Adhoc charge basis shall not be counted as Offg: or probation period at any cost.
- The promotion on Adhoc charge basis shall not confer any right of seniority against the candidates who would be later on inducted as ASI through Public Service Commission.
- They shall execute an affidavit to the effect of above conditions.

Their posting order will be issued separately:-

S. No	Name of Official	Present Postings
1.	HC Akhtar Ullah No. 722	Special Branch
2.	HC Ahmad Yaar No. 486	Karak District
3.	HC Rustam Khan No. 38	Kohat District
4.	HC Amil Jan No. 136	Invest: Hangu
5.	HC Muhammad Riaz No. 434	Kohat District
6.	HC Umar Ali No. 308	Hangu District
7.	HC Muhammad Iqbal No. 214	Kohat District
8.	HC Ilyas Hussain No. 256	Hangu District
9.	HC Naeem Hussain No. 77	Hangu District
10.	HC Ajmal Khan No. 194	Invest: Karak
11.	HC Habib ur Rehman No. 990	Kohat District
12.	HC Muhammad Khan No. 31/807	Kohat / PTC
13.	HC Mujeeb ur Rehman No. 111	Karak District
14.	HC Islam Noor No. 98	Kohat District
15.	HC Umer Saeed No. 72	Motorway
16.	HC Muhammad Arif No. 283	Invest: Karak
17.	HC Mukhtiar Gul No. 110	Special Branch
18.	HC Asim Imtiaz No. 150/1542	CTD
19.	HC Sher Zaman No. 461	Invest: Karak
20.	HC Khaziq Rehman No. 204	Kohat District
21.	HC Khidmat Ali No. 1337/960	Karak District
22.	HC Saifraz No. 388	Special Branch
23.	HC Irshad Muhammad No. 41	Karak District
24.	HC Mumtaz Khan No. 740	Invest: Kohat
25.	HC Rehmat Ullah No. 940	Kohat District
26.	HC Ihsan Ali No. 121	Hangu District
27.	HC Khalid Nawaz no. 39	Karak District
28.	HC Noor Badshah No. 474	Karak District

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29.	HC Mohib Ali No. 177	Hangu District
30.	HC Khalid Mehmoos No. 135	Hangu District
31.	HC Qismat Khan	Kohat District
32.	HC Yaqeen Ali No. 144	Hangu District
33.	HC Aman Ullah No. 1149	Invest: Kohat
34.	HC Umer Sadiq No. 488	Invest: Kohat
35.	HC Abdur Rauf No. 519	Kohat District
36.	HC Muhammad Ayaz No. 165	Hangu District
37.	HC Naveed Khan No. 741	Kohat District
38.	HC Muhammad Kamran No. 357	Special Branch
39.	HC Lal Shahzad No. 65	Invest: Karak
40.	HC Nazir Badshah No. 158	Hangu District
41.	HC Muhammad Ijaz No. 11	Karak district

The promotion will take effect from the date of taking over charge of higher responsibilities.

Awal Khan
 (AWAL KHAN)
 Regional Police Officer,
 Kohat Region.

OFFICE OF THE REGIONAL POLICE OFFICER, KOHAT

No. 14911-20 /EC, dated Kohat the 23/12 /2016.

- Copy of above is submitted for favour of information to the:
1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
 2. Addl: Inspector General of Police, Special Branch, KPK Peshawar.
 3. Dy: Inspector General of Police, CTD, Khyber Pakhtunkhwa Peshawar.
 4. The Deputy Inspector General of Police, NH&MP, Chungi No. 26, Motorway Chowk, Islamabad.
 5. The Deputy Commandant, Elite Force, Khyber Pakhtunkhwa Peshawar
 6. The Commandant, Police Training College, Hangu.
 7. The SSP Office, NH&MP, M-1, Anbar, Swabi.
 8. All Heads of Police Offices in Kohat Region.
 9. SP CTD Kohat Region.
 10. Confidential Clerk Region Office, Kohat

OHC/SRC

per injection
M
 Dist: Kohat
 Karak

Awal Khan
 (AWAL KHAN)
 Regional Police Officer,
 Kohat Region.

Awal Khan
 (AWAL KHAN)
 Regional Police Officer,
 Kohat Region.

Kohat District
 Karak District
 Investigative Branch
 Special Branch
 CTD
 NH&MP
 Elite Force
 Training College
 Peshawar

ORDER.

The following senior most / eligible Adhoc ASIs of this Region Police, already promoted as on acting charge basis, are hereby regularized as Offg: ASIs against the existing vacancies, according to reserved quota of promotee ASIs with immediate effect:-

S.No.	Rank & Name	Present Posting
1.	Adhoc ASI S. Muhammad Abdullah 1020	Hangu district
2.	Adhoc ASI Khaziq Rehman 204	CTD
3.	Adhoc ASI Khidmat Ali 960	CTD
4.	Adhoc ASI Sarfaraz 388	Traffic School Kohat
5.	Adhoc ASI Irshad Muhammad 41	Karak district
6.	Adhoc ASI Mumtaz Khan 740	Invest: Kohat
7.	Adhoc ASI Khaliq Nawaz 39	CTD
8.	Adhoc ASI Noor Badshah 474	Karak district
9.	Adhoc ASI Mohib Ali 177	Hangu district
10.	Adhoc ASI Khalid Mehmood 135	Hangu district
11.	Adhoc ASI Qismat Khan	Kohat district
12.	Adhoc ASI Yaqeen Ali 144	Hangu district
13.	Adhoc ASI Aman Ullah 1149	Kohat district
14.	Adhoc ASI Umer Sadiq 488	CTD
15.	Adhoc ASI Abdur Rauf 519	Kohat district
16.	Adhoc ASI Muhammad Ayaz 165	Invest: Hangu
17.	Adhoc ASI Naveed Khan 741 - 151	Karak district
18.	Adhoc ASI Muhammad Kamran 357	Special Branch
19.	Adhoc ASI Lat Shahzada 65	Invest: Karak
20.	Adhoc ASI Nazir Badshah 158	Invest: Hangu
21.	Adhoc ASI Muhammad Ijaz 11	Karak district

Necessary gazette notification may be issued accordingly.

(MUHAMMAD IJAZ KHAN) PSP
Regional Police Officer,
Kohat Region.

Officer,
of Police,
Peshawar.

No. 1683-93/EC, dated Kohat the 21-10-2019.

Copy of above is submitted to the Inspector General of Police, Khyber Pakhtunkhwa for favour of information please.

2. The Addl: Inspector General of Police, Special Branch, Khyber Pakhtunkhwa
3. The Dy: Inspector General of Police, CTD, Khyber Pakhtunkhwa
4. The Director, Traffic Management School, Kohat
5. All Heads of Police Offices, Kohat Region.
6. Confidential Clerk, Region Office, Kohat.

Police Officer,
at Region.

(MUHAMMAD IJAZ KHAN) PSP
Regional Police Officer,
Kohat Region.

RECEIVED
for information

SMA
Kohat Region

ORDER.

On the recommendation of Departmental Promotion Committee, in its meeting, held in Region Office Kohat on 15.06.2021, the following Officiating ASIs on list 'D' of Kohat Region Police are hereby approved for confirmation in their substantive rank of Asstt. Sub-Inspector as noted against each by counting their officiating period towards the period of probation as required under Police Rule 1934 Chapter 13 Sub Rule 13.18 and their names are hereby brought on promotion list 'E' with immediate effect.

They are allotted new Range Nos. as noted against each:-

S.No.	Rank, Name & No.	Date of Confirmation	New Range No.
1	Offg: ASI Usman No. 21	13.02.2019	77/K
2	Offg: ASI Jehad Ali No. 1318	13.02.2019	85/K
3	Offg: ASI Wali Bai No. 643	13.02.2019	96/K
4	Offg: ASI Syed M. Abdullah-220	22.02.2021	99/K
5	Offg: ASI Akhtar Ullah No. 722	07.06.2020	101/K
6	Offg: ASI Rustam Khan No. 38	07.06.2020	106/K
7	Offg: ASI Amil Jan No. 136	07.06.2020	111/K
8	Offg: ASI Muhammad Riaz No. 434	07.06.2020	126/K
9	Offg: ASI Umar Ali No. 308	07.06.2020	135/K
10	Offg: ASI Muhammad Iqbal No. 761	07.06.2020	142/K
11	Offg: ASI Ilyas Hussain No. 256	07.06.2020	146/K
12	Offg: ASI Ajmal Khan No. 164	07.06.2020	52/K
13	Offg: ASI Habib ur Rehman No. 990	07.06.2020	160/K
14	Offg: ASI Islam Noor No. 98	07.06.2020	161/K
15	Offg: ASI Muhammad Arif No. 283	07.06.2020	177/K
16	Offg: ASI Mukhtiar Gul No. 110	07.06.2020	187/K
17	Offg: ASI Asim Imtiaz No. 150/1542	07.06.2020	210/K
18	Offg: ASI Sher Zaman No. 461	07.06.2020	211/K
19	Offg: ASI Khaziq Rehman No. 204	22.02.2021	212/K
20	Offg: ASI Khidmat Ali No. 1337/960	22.02.2021	213/K
21	Offg: ASI Sarfaraz No. 388	22.02.2021	214/K
22	Offg: ASI Irshad Muhammad No. 41	22.02.2021	215/K
23	Offg: ASI Muntaz Khan No. 740	22.02.2021	219/K
24	Offg: ASI Khalaq Nawaz No. 39	22.02.2021	221/K
25	Offg: ASI Noor Badshah No. 474	22.02.2021	225/K
26	Offg: ASI Mohib Ali No. 177	22.02.2021	229/K
27	Offg: ASI Khalid Mehmood No. 135	22.02.2021	230/K
28	Offg: ASI Qismat Khan	22.02.2021	231/K
29	Offg: ASI Yaqeen Ali No. 144	22.02.2021	236/K
30	Offg: ASI Aman Ullah No. 1149	22.02.2021	245/K

14-7-21

(16)

31	Offg: ASI Umer Sadiq No. 488	22.02.2021	24/K
32	Offg: ASI Abdur Rauf No. 519	22.02.2021	24/K
33	Offg: ASI Naveed Khan No. 741	22.02.2021	254/K
34	Offg: ASI Muhammad Kamran No. 357	22.02.2021	256/K
35	Offg: ASI Lal Shalzada No. 65	22.02.2021	262/K
36	Offg: ASI Nazir Badshah No. 158	22.02.2021	263/K
37	Offg: ASI Muhammad Ijaz No. 11	22.02.2021	264/K

All those officials who were approved for confirmation as ASI subject to provision of ACRs shall complete their missing ACRs within 07-days positively. In case of failure, their confirmation order will be withdrawn.

Necessary gazette notification may be issued accordingly.

Muhammad Zafar Ali
(MUHAMMAD ZAFAR ALI) PSP
Regional Police Officer,
Kohat Region.

No. 10647-61 /EC, dated Kohat the 9/7 /2021.

Copy of above is submitted for favour of information to the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar, please.

- 2.
- 3.
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- The Deputy Inspector General of Police, CTD.
- The Deputy Inspector General of Police, Special Branch.
- The Commandant, PTC Hangu.
- The Director, Anti-Corruption Establishment.
- The Director, Police School of Traffic Management Kohat.
- All the Heads of Police Offices, Kohat Region.
- Confidential Clerk, Region Office, Kohat with the direction to issue directives to all concerned for early completion of their missing ACRs.

SAC/OHC/1001
Entry made in RCR
S-1001

Muhammad Zafar Ali
(MUHAMMAD ZAFAR ALI) PSP
Regional Police Officer,
Kohat Region.

District Police Officer
13/7 Karak

To,

The Regional Police Officer,

Kohat Region, Kohat

(E)

(17)

Through: PROPER CHANNE.

Subject: REPRESENTATION AGAINST THE LIST OF SUB INSPECTORS AND ASSISTANT SUB INSPECTOR AS IT STOOD ON 27.12.2023 CIRCULATED VIDE NO. 13499-518/EC DATED 27.12.2023.

Respected Sir,

With profound regard, appellant and submits representation against impugned seniority List based on the following facts and grounds:

Facts:

1. That the appellant was promoted to the ranks of ASI on ad-hoc/officiating basis vide order No. 6159-62/EC dated 13.07.2011. According to the order promotion was made on ad-hoc basis and word officiating was also laid down against the name of appellant in the order no condition of claiming seniority or otherwise was mentioned in the order.
2. That appellant was once again promoted to the rank of ASI on ad-hoc basis vide order No. 14911-20/EC dated 23.12.2016 with certain condition of non claiming seniority. Appellant was regularly promoted vide order No. 1683-93/EC dated 21.02.2019. later on the confirmation was also revised order No.10647-61/EC dated 09.07.2021 in the conformation was again disturbed and was made from 21,02,2021.
3. That the name of appellant has been shown at shown at serial No. 154 of the impugned seniority list and has been placed junior to the junior most Assistant-Sub-Inspectors of Kohat Region. Hence this representation on the following grounds.

GROUNDS.

- a. That appellant was initially promoted on ad-hoc basis to the rank of ASI on 13.07.2011 with no clog of claiming seniority and wrongly again promoted officiating basis with effect from 21.02.2019. Appellant was already availing promotion with effect from 13.07.2011 therefore the confirmation of appellant was done on 13.07.2013. After successful completion of probation period, therefore the second officiating promotion order of appellant on 21.02.2019 was wrong and was also wrongly confirmed with effect from 21.02.2021 despite the fact appellant confirmation was the revised vide order No. 985-98/EC dated 18.01.2022 and was made with effect from 21.02.2019.

18

- b. That the ad-hoc promotion and officiating promotion are akin. In civil servant laws word ad-hoc is used while in Police Rules word officiating has been used. Therefore the confirmation of appellant with effect from 21.02.2021 is against the law and Rules. There is nothing on record that appellant performance were not satisfactory during the period with effect from 13.07.2011 and 21.02.2019. Under the law confirmation in the rank is required after two years but appellant was confirmed after (11) years. Therefore appellant has wrongly been made junior to junior most ASI,s.
- c. That it is settled principle of law and rules that a civil servant received on transfer will be placed at the bottom of seniority list. Therefore ASI,s placed at serial No. 75 to 122 of the impugned seniority list received on transfer from Orakzai and Kurram of merged Districts have wrongly been made senior to appellant. Again all of the them are personnel of " Levy" and "Khasadar" force and are untrained officers. They have not qualified the promotion courses.
- d. That appellant has successfully commanded various police station of Kohat Region as Station House Officer and earned commendation certificates. Appellant was known as professional Police officer. Therefore placing of appellant junior to the Police officer who have never been assigned the duty of independent command is not justified.

It is therefore requested that the date of confirmation of appellant may be revised. The appellant may confirmed from 13.07.2013 and also the name of appellant may be place above the names of ASI,s received on transfer from "Levy" & "Khasadar" force of merged districts.

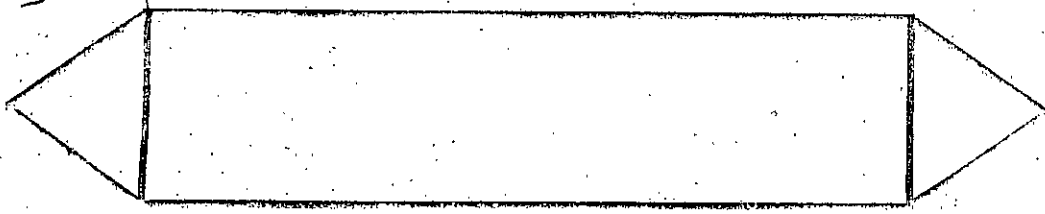
Your obediently

Qismat Khan ASI/231K

Police line Kohat.

9/11/24

باعت خیرا شکہ



2024ء پنجاب ایسٹ

مورخہ

مقدمہ

دعویٰ

جرم

باعت خیرا شکہ

باعت خیرا شکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکل کاروائی متعلقہ

کیلئے لکھنا شکہ

آن مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راشی نامہ کرنے کے تقرر ثالث و فیصلہ پر حلف دیئے جواب وہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھنا یا کہ سند ہے۔

2024ء

ماہ

16

المرقوم

المیہ

ACCEPTED

مقام