


FORM OF ORDER SHEET

Court of _____

Appeal No. 681/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/05/2024	<p>The appeal of Mr. Mujhaid Ali Iqbal resubmitted today by Mr. Shahid Naseem Khan Chamkani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 23.05.2024. Parcha Peshi given to the counsel for the appellant .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Mujahid Ali Iqbal received today i.e on 14.05.2024 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1st According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no.1 & 2 are un-necessary/improper parties, 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- Memorandum of appeal is not signed by the appellatant.
- 3- Page nos. 7, 11 & 13 of the appeal are illegible be replaced by legible/better one.
- 4- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent-may also be submitted with the appeal.

No. 30 /Inst;/2024/KPST,

Dt. 14/05 /2024.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.
14/5/2024

Shahid Naseem Khan Chamkani Adv.
High Court Peshawar.

All objections are cleared!

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 681 /2024


Mujahid Ali Iqbal. **APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

I N D E X

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Appellant
Through 
**Shahid Naseem Khan
Chamkani**
Advocate High Court

Dated: 10.05.2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 681 /2024

Mujahid Ali Iqbal (Ex-Constable No.1510/FRP)

R/o Village Garh Jawal Khel, P.O Dab, Tehsil & District
Karak. **APPELLANT**

VERSUS

1. Commandant FRP, Peshawar.
2. Superintendent of Police FRP, Kohat. . . **RESPONDENTS**

APPEAL U/S 4 OF THE SERVICE TRIBUNAL
ACT, 1974 AGAINST THE IMPUGNED ORDER
DATED 31.01.2012, OF RESPONDENT NO.2,
WHEREBY APPELLANT WAS REMOVED FROM
SERVICE AND ORDER DATED 09.04.2012,
WHEREBY THE DEPARTMENTAL APPEAL OF
THE APPELLANT WAS REJECTED BY THE
RESPONDENT NO.3.

Respectfully Sheweth:

1. That appellant joined the respondents' Department as a Constable in the year 2009 at the Kohat Police strength.
2. That since his enrollment in the respondents' department, the appellant performed his official work with honesty, dedication and zeal and zest.

3. That with the performance of the appellant, his officers were also satisfied and never preferred any complaint against the appellant.
4. That unfortunately in the year 2011, while serving in the police, the appellant suffered from chronic disease and remained absent from duty. (Copies of Medical Prescriptions are attached).
5. That in the meantime, at the back of the appellant, departmental proceedings on the ground of absence from duty, were initiated against the appellant and an enquiry was conducted, whereas the appellant was not associated with the proceedings of the said enquiry and astonishingly on 31.01.2012, the appellant was removed from service. (Copy of Impugned Removal Order is attached).
6. That the appellant was not even called to office for announcement of order in presence of the appellant.
7. That being aggrieved, the appellant has filed a departmental appeal before the respondent No.3, which too met the same fate, vide order dated 09.04.2012. (Copies of Departmental Appeal and Order are attached).
8. That the appellant feeling aggrieved and having no other adequate available remedy approached this Hon'ble Tribunal, on the following amongst other grounds;

G R O U N D S:

- A. That the impugned order of the removal from service of the appellant is not in accordance with law, rules

and the principles of natural justice, hence it is liable to be set aside.

- B. That the enquiry was conducted at the back of the appellant. The enquiry officer failed to associate the appellant with the enquiry proceedings.
- C. That the appellant was not provided opportunity to defend himself nor was he afforded opportunity to cross examine the witnesses. Hence enquiry is one sided, unilateral and legally defective and on the basis of such enquiry no punishment can be awarded.
- D. That due to process of law has not been followed which is mandatory in the eyes of law.
- E. That the order is also in violation of Article 10-A of the constitution, the said provision has envisaged that trial/inquiry shall be transparent and independent, but unfortunately the alleged enquiry against the appellant is neither independent nor transparent. Hence the fundamental right of the appellant was violated which alone has made the enquiry and the impugned order legally questionable and of not legal consequences upon the rights of the appellant.
- F. That against any void order no limitation runs.
- G. That the appeal against the impugned order has strong probability to succeed on merits, however, the worthy respondent office may take the shield of some technicalities like limitation, but it is an

admitted legal fact that when case or appeal is fit to be accepted on merits then technicalities should not come in their way and they should be ignored and decision is to be delivered on merit. Same principle is applicable on the case/ appeal of the appellant. In this regard the Hon'ble Supreme Court of Pakistan has decided the matter in affirmative.

- H. That the appellant has completely fit and he is fit to serve the Police Department with more enthusiasm and dedication.
- I. That any other ground with the permission of this Hon'ble Tribunal, will be raised at the time of arguments.

It is humbly prayed that on acceptance of the instant appeal, the impugned Orders of the respondents No. 1 & 2 may kindly be set aside in the interest of justice and the appellant may kindly be reinstated in service with all back benefits.

Any other relief deems fit and appropriate in the circumstances of the case may also be granted.

Through Appellant



**Shahid Naseem Khan
Chamkani**

&



**Asghar Shah
Advocates Peshawar**

Dated: 10.05.2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2024

Mujahid Ali Iqbal. **APPELLANT**

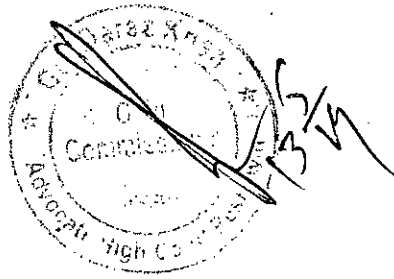
VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

AFFIDAVIT

I, Shahid Naseem Khan Chamkani Advocate High Court, as per information conveyed to me by my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


ADVOCATE



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2024

Mujahid Ali Iqbal. **APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

ADDRESSES OF THE PARTIES

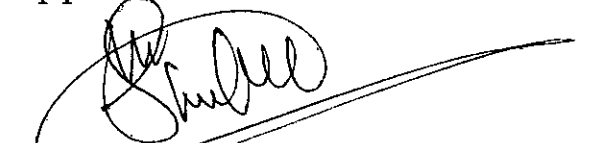
APPELLANT:

Mujahid Ali Iqbal (Ex-Constable No.1510/FRP)
R/o Village Garh Jawal Khel, P.O Dab, Tehsil & District
Karak.

RESPONDENTS:

1. Commandant FRP, Peshawar.
2. Superintendent of Police FRP, Kohat.

Through Appellant



Shahid Naseem Khan
Chamkani
Advocate High Court

Dated: 10.05.2024

7

O R D E R.

Constable Mujahid Ali No. 1510 while posted at PS Thall- absented himself from 25.09.2011 to 14.12.2011 without any leave or permission of the competent authority.

He was served with Charge Sheet and summary of allegations vide this office No. 215/PA dated 09.12.2011 and DSP Gul Rais Khan was appointed as Enquiry Officer. The defaulter constable has also been served with Final Show Cause Notice vide this office No. 220 dated 27.12.2011.

According to the findings of DSP FRP the above named Constable is habitual absentee and un-willing worker. He remained absent for 80 days on his own accord. In his statement, he stated that he was ill, but during the course of enquiry not only he failed to prove his illness but also failed to produce any medical certificate etc. He is burden on the shoulders of FRP, therefore he is removed from service from the date of absence i.e 25.09.2011 under Removal From Service (Special Powers) Ordinance - 2000.

OB No.

56

Dated

31/1/2012

g
k

W. Rasid Khan
Superintendent of Police, FRP,
Kohat Range, Kohat

Copy to:-

1. Pay Officer
2. Lines Officer
3. SRC
4. OASIL

Q
ATTEST

7

O R D E R

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OB No.56
Dated 31/1/2012

Sd/-
Superintendent of Police FRP,
Kohat Rang, Kohat

Copy to:-

1. Pay Officer
2. Lines Officer
3. SRC
4. OASI

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BEFORE THE LEARNED COMMANDANT FRP PESHAWAR

Constable Mujahid Ali No.1510 FRP Kohat.....Appellant

Handwritten number 29 in a circle.

VERSUS

Superintendent of Police FRP Kohat Range Kohat.....Respondent.

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER NO. OB 56 DATED 31-01-2012 OF RESPONDENT NO.1 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE ON ACCOUNT OF ABSENCE FROM SERVICE.

PRAYER

On acceptance of this appeal the impugned order referred to above may please be set aside being illegal, contrary to prescribed services rule, Police rule and also against the facts and circumstances of case. Therefore the appellant may please be reinstated in service with all back benefits.

Facts/Grounds

1. That the appellant joined police department as constable in 2009. During his service he performed his duty to the entire satisfaction of his superior which is evident from the record.
2. That the appellant was granted casual leave. During availing leave at home the appellant became ill. He submitted an application through his relative for grant of Medical leave. The appellant was in the anticipation that the leave applied for would be sanctioned. Later on it came to the appellant that the leave has not been granted through the authority concerned for grant of leave on medical grounds to the effect that the appellant was under treatment of Medical Specialist, therefore he was unable to attend his duty, but his request was turned down.

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3. That later on charge Sheet statement of allegation was delivered to the appellant for which the appellant gave reply which was placed on inquiry file. During the inquiry conducted by inquiry Officer no proper opportunity was given to the appellant to produce medical documents with regard to justify his absence from duty. The inquiry proceeding was conducted as ex parte.
4. That the relevant provision of prescribed services rule indicate that delinquent official be given full opportunity to explain his position, but the inquiry Officer did not fulfil his obligations as required under rules.
5. That the in impugned order it has been incorporated that the appellant is habitual absentee is totally incorrect. Besides the Special ordinance 2000 has been already repealed, but the removing authority has committed illegality irregularity, hence calling for interference of this Hon'ble authority.
6. That the impugned order is not speaking order is illegal, unlawful, which has no validity in the eyes of law.
7. That the appeal is within time.

Keeping in view it is humbly prayed that the appeal may please be accepted, set aside the impugned order and the appellant may graciously be reinstated in service for ends of justice.

Dated:- 27-02-2012.

Mujahid Ali
Appellant
Constable Mujahid Ali
No.1510 FRP

Affidavit

I, do hereby solemnly affirm and declare that the above contents are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Authority.

Mujahid Ali

2012

Mujahid Ali
ATTESTED

17

The Inspector General of Police
Khyber Pakhtunkhwa, Peshawar

Subject : Review Petition

Respected Sir,

With due respect and humble submission , petitioner submits
Representation based on the following facts and generals:

Facts

- a. That petitioner joint police department FRP as constable in the year 2009.
- b. That petitioner qualified recruit course and was serving police to the entire satisfaction of senior officers.
- c. That in the year 2011 , petitioner suffered from chronic disease and failed to join duties and was marked absent and was eventually dismissed from service vide order dated 31.01.2012 passed by SP FRP Kohat. The departmental appeal of petitioner was rejected vide order of the Commandant FRP Peshawar dated 09.04.2012.
- d. That petitioner submitted a mercy petition before your honor but no response was received , hence a fresh review petition is submitted on the following grounds.

Grounds

- a. That the impugned order is void ab-initio as enquiry was entrusted to Gul Raees Khan (late) DSP FRP and he after conducting enquiry also passed the impugned order (Enquiry Officer himself conducted enquiry and dismissed the petitioner) having no legal jurisdiction to dismiss the petitioner. The order of dismissal from service is void because an enquiry officer passed the order despite the fact he was incompetent to issue such order under the rules.
- b. That the authority did not take into account medical rest produced in support of alleged absence from duty.
- c. That the enquiry file was prepared in violation of rules as no chance of defense was provided to petitioner. No chance of cross-examination of the witness was provided to petitioner.
- d. The petitioner was proceeded departmentally under the wrong law and rules.
- e. That petitioner belongs to a poor family and is unable to manage family affairs by working on daily wages basis having small offspring and whole family to support.

It is therefore requested that petitioner may be re-instated in service with all back benefits and obliged.

ATTESTED

Yours faithfully,

Mujahid Ali Iqbal

Ex-Constable No. 1510/FRP
Village Garh Jawal Khel, The & Distt
Karak, PO Dhab, Cell No. 03455373740

Enclosed please find herewith an appeal submitted by Ex-Constable Mujahid Ali No. 1510 of your Range for reinstatement in service for detail comments. His service record alongwith departmental file may also be sent to this office for disposal of his appeal.

Subject: -
Memo: -

APPEAL FOR REINSTATEMENT IN SERVICE

To: 1018
The Addl: IGP/Commandant FRP
Khyber Pakhtunkhwa, Peshawar.
The Superintendent of Police FRP
Kohat Range
/EC dated Peshawar the 27/12/2017.

(11)

M. [Signature]
For Addl: IGP/Commandant FRP
Khyber Pakhtunkhwa Peshawar
11/12

11/12/17

11

To

The Addl: IGP/Commandant FRP
Khyber Pakhtunkhwa, Peshawar.
The Superintendent of Police FRP
Kohat Range.

No.1019 /EC dated Peshawar the 29/02/2012

Subject:- **APPEAL FOR REINSTATEMENT IN SERVICE**

Memo: -

Enclosed please find herewith an appeal submitted by Ex-Constable Mujahid Ali No. 1510 of your Range for reinstatement in service for detail comments. His service record alongwith departmental file may also be sent to this office for disposal of his appeal.

Sd/-
OFFICE SUPDT:
For Addl: IGP/Commandant FRP
Khyber Pakhtunkhwa Peshawar

W

RECEIVED
22

For Insurance Notices see reverse.

No. 1330
RGL58819902

Stamps affixed except in case of uninsured letters of an inland Post Office Grade or on which no acknowledgment is due.

Received a registered addressed to _____

Date Stamp _____

Initials of Receiving Officer _____
 Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____
 (in words) _____

Insurance fee Rs. _____
 P.S. (in words) _____
 Rs. _____

Name and address of sender _____

Uninsured

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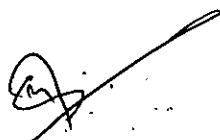
ORDER

This order shall dispose off on the appeal Ex-Constable
Mujahid Ali No. 1510 of FRP Kohat Range against the order of SP FRP Kohat
Range.

13

Brief facts of the case are that he while posted to Police Station
Thall absented himself from duty w-e-f 25.09.2011 to 14.12.2011 for a total period
of 02 months and 19 days without any leave/permission of the competent
authority. He was issued Charge sheet/statement of allegation and DSP Gul Races
Khan was nominated as inquiry officer. After enquiry the Inquiry Officer
submitted his findings wherein he recommended the defaulter constable for major
punishment. He was issued Show Cause Notice, but his reply was not satisfactory.
Therefore he was removed from service by the SP FRP Kohat Range vide OB No.
56 dated 31.01.2012.

However from the perusal of record and finding of Inquiry
officer there are no cogent reason to interfere in the order of SP FRP Kohat Range.
Therefore his appeal is rejected.



Add: IGP/Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar.

Shi 2012

No. 1966/67 A/C dated Peshawar the

09/04/2012.

Copy of above is sent for information and necessary action to the:-

Superintendent of P-FRP Kohat Range, w/r to his Memo: No. 382/A/C dated
13.03.2012. Service record and departmental Inquiry file are returned
herewith for record in your office.

Ex Constable Mujahid Ali No. 1510 S/o Gul Saib Khan R/o Village Garah
Javed Khel District Karak.

ORDER.

This order shall dispose off on the appeal Ex-Constable Mujahid Ali No. 1510 of FRP Kohat Range against the order of SPF RP Kohat Range.

Brief facts of the case are that he while posted to Police Station Thall absented himself from duty w-e-f 25.09.2011 to 14.12.2011 for a total period of **02 months and 19 days** without any leave/permission of the competent authority. He was issued Charge sheet/statement of allegation and DSP Gul Raees Khan was nominated as Enquiry officer. After enquiry the Enquiry Officer submitted his findings wherein he recommended the defaulter constable for major punishment. He was issued Show Cause Notice, but his reply was not satisfactory Therefore he was removed from service by the SP FRP Kohat Range vide OB No.56 dated 31.01.2012.

However from the perusal of record and finding of Enquiry officer there are no cogent reason to interfere in the order of SP FRP Kohat Range. Therefore his appeal is rejected.

Sd/-,
Addl: IGP/Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

No.1966-67/EC dated Peshawar the 09/04/2012

Copy of above is sent for information and necessary action to the:-

1. Superintendent of P-FRP Kohat Range, w/r to his Memo: No.382/EC dated 13.03.2012. Service record and departmental Enquiry file are returned herewith for record in your office.
2. Ex Constable Mujahid Ali No. 1510 S/o Gul Saib Khan R/o Village Garah Javed Khel District Karak.



From The Sup. of Police,
FRP, Kohat

To The Addl. IGP/Commandant,
FRP Khyber Pakhtunkhwa, Peshawar

No 80 /EC, dated Kohat the 15/11 /2015

Subject: APPLICATION
Memo:

[Handwritten signature]
14

Kindly refer to your good office Endst: No. 202/EC dated 08.01.2015 on the subject noted above.

It is submitted for your kind honour that Ex-Constable Mujahid Ali Iqbal No. 1510 while posted at P.S Thal absented himself from his lawful duty from 25.09.2011 to 14.12.2011 without obtaining any leave or permission from the competent authority. The above named Ex-Constable was served with charge sheet & summary of allegation vide this office. 215/PA dated 09.12.2011 and the then DSP Gul Rais Khan was appointed as Enquiry officer. The defaulter Constable was served with final show cause notice vide this office No. 220/PA dated 27.12.2011.

The Enquiry officer in his finding came to the conclusion that the said constable is habitual absentee and unwilling worker. Also 80 days absence exists at his credit of defaulter constable. The defaulter constable took plea with regard to his ailment but neither he produce any medical certificate nor he put in tangible proof in support of his ailment. Therefore the defaulter official Constable Mujahid Ali No. 1510 was removed from service from the date of absence i.e 25.09.2011 under removal from service (Special Power ordinance - 2000) vide this office OB No. 56 dated 31.01.2012.

It was established that the accused official was habitual absentee and he has enjoyed French leave without assigning any cogent reason directly or indirectly to his superiors which proved that the absence on his part was willful and intentional. This act on his part is quite adverse and is against the norms of discipline. It is every likelihood that the above mentioned ex-Constable can not become a good police officer; in view of the above his re-instatement in service is not recommended.

The appeals filed by the defaulter official before your good honour was rejected vide your good office Endst: No. 1966-67/EC dated 09.04.2012. Similarly the appeal of the said Ex-Constable was rejected by honourable Police Chief Khyber Pakhtunkhwa, Peshawar vide his office letter No. 5391/E-II dated 04.03.2013.

His bio data is submitted as follows.

1. Name: Mujahid Ali No.1510
2. Date of Enlistment: 11.08.2009
3. Date of Dismissal: 31.01.2012
4. Good Entry: Nil
5. Bad Entry: 08
6. Absence period: 20 days

The departmental enquiry file and service record of the Ex-Constable Mujahid Ali Iqbal No.1510 is submitted herewith which may kindly be returned when no longer required please.

[Handwritten signature]

[Handwritten signature]
Superintendent of Police, FRP,
Kohat Range, Kohat

From: The Superintendent of Police,
FRP, Kohat

To: The Commandant,
FRP, Khyber Pakhtunkhwa, Peshawar

No. 1574 /EC, dated Kohat the 12/10 /2015

Subject: APPEAL FOR RE-INSTATEMENT IN SERVICE
Memo:

Kindly refer to your office memo: No. 8137/EC dated 01.10.2015

In this regard a detail comments, departmental enquiry file and service record of the Ex constable Mujahid Ali Iqbal No. 1510 has already been submitted to your good office regarding his re-instatement in service vide this office Memo: No. 80/EC dated 15.01.2015.

Appeal received with your above reference is returned herewith.

قامر اورنگ مہتاب خان
0345-5373740

qu

Superintendent of Police,
FRP, Kohat

APPROVED



OFFICE OF THE
INSPECTOR GENERAL OF
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar
No. SI 2188
22, dated Peshawar the 22/19, 2021.

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16

APPLICATION FOR RE-INSTATMENT IN SERVICE.

Subject: Memor:

Ex-FC Mujahid Ali No. 1510 of FRP Police has preferred application to the
Worthy IGP/Khyber Pakhtunkhwa for reinstatement in service.

In order to proceed further in the matter, a copy of his appeal rejection order
may be sent in this office, please.

(AFSAR JAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar



[Handwritten signature]

[Handwritten signature]

Office of
Commandant FRP ICP, Peshawar

No. 8011 / SI 1471, dated 29/09/2022.

Copy of above document is enclosed forwarded to the
SP FRP Kohat Range for information and further
action. The copy of the document is also enclosed for
reference to the office for onward submission.

to CPO #1

014/58c

FR Complaint

[Handwritten signature]
13/10/22

Superintendent of Police,
FRP Kohat Range,
Kohat

To

The Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar

Subject:

MERCY PETITION

17

Respected Sir,


The petitioner knock at the door of your good office by submitting the present mercy petition for the revival and survival of the lost service with following lines:-

FACTS

1. That petitioner belongs to poor family and was enrolled in the FRP Police with effect from 22.08.2009. Petitioner successfully qualified the basic course and was rendering services to the entire satisfaction of senior and superior officers.
2. That in the year 2011 petitioner was posted at Police Station Thall district Hangu and petitioner suffered from chronic disease of typhoid and the SHO of Police Station directed the petitioner to manage private treatment.
3. That petitioner left the station and was managing treatment and later on petitioner came to know that he was marked absent and was dismissed from service vide of Superintendent of Police FRP Kohat bearing OB No. 56 dated 01.01.2012.
4. That petitioner filed representation against the above order but the same was also rejected vide order bearing No. 1966-67/EC dated 09.04.2012 issued by Additional Inspector General / Commandant FRP KP.
5. That petitioner lost the legal battle, therefore submits the present mercy petition.

GROUND

- a. That the impugned orders were passed in violation of the law and rules. The petitioner was dismissed from service vide order of FRP Kohat without committing any misconduct and negligence in duty.
- b. That petitioner belongs to poor family and father of petitioner died of cardiac arrest and one of the brothers of petitioner is mentally upset and his treatment requires heavy expenses. therefore petitioner is unable to face the domestic affairs with out any permanent job. Petitioner use to earn livelihood by working on daily wages basis.


MERCY PETITION

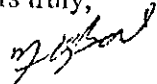
That the lost of service of petitioner is not less than killing the goose which lay the golden eggs. Therefore revival of service of petitioner is necessary for sailing the life boat of the family of petitioner.

d.

That the lower authority did not take into account the illness of petitioner and the absence of petitioner was not deliberate rather it was inevitable.

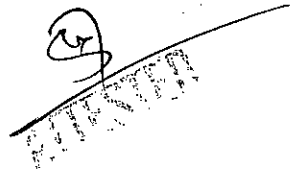
It is therefore requested the impugned orders may please be set aside and petitioner may be reinstated in service with all consequential benefits.

Yours truly,



(MUJAHID ALI)

Ex- FRP Constable No.1510
Village Garh Jawal Khel Post
office Dab, Tehsil and District Karak



29

Appeal-2022



OFFICE OF THE SUPERINTENDENT OF POLICE,
FRP KOHAT RANGE, KOHAT

PH NO: 0922-9260124, FAX: 0922-9260134

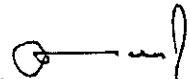
No. 1920 /EC, dated Kohat the 21/10/ 2022

To: The Commandant, FRP
Khyber Pakhtunkhwa, Peshawar

Subject: APPEAL FOR RE-INSTATEMENT IN SERVICE
Memo:

Kindly refer to your office Endst: No. 8011/SI Legal dated 29.09.2022
on the subject noted above.

It is submitted that the service record alongwith fauji missal and
departmental enquiry file of Ex- Constable Mujahid Ali No. 1510 of this Range has already
been sent to your office vide this office letter No. 80/EC dated 15.01.2015, please.


SUPERINTENDENT OF POLICE, FRP
KOHAT RANGE, KOHAT


21/10/2022

Popular
Clinical Laboratory



پاپولر کلینیکل لیبارٹری

Mob: 0332-9905645

Name

Mushtaq Ali

Age

38/10

Sex

Date 26/9/11

Test Required

SR

Specimen

SR

TEST	RESULT	REFERENCE VALUES	TEST	RESULT	REFERENCE VALUES
LIVER PROFILE			LIPID PROFILE		
Bilirubin Total	3.6 mg/dL	Upto 0-1.0 mg/dL	Total Lipid	mg/dL	500-1000 mg/dL
Bilirubin Direct	mg/dL	Upto 0.3 mg/dL	Cholesterol	mg/dL	150-250 mg/L
Bilirubin Indirect	mg/dL		Triglyceride	mg/dL	50-150 mg/dL
ALT (GPT)	U/L	Upto 40 U/L	H.D.L	mg/dL	<35 mg/dL
Alk. Phosphatase	U/L		L.D.L	Mg/dL	>160 mg/dL
Total Proteins	G/dL	6.0 to 8.0 G/dL	ELECTROLYTES		
Albumin	G/dL	3.5 to 5.0 G/dL	Sodium	mmol/L	136-149 mmol/L
Globulin	G/dL	2.0 to 3.0 G/dL	Potassium	mmol/L	3.0-5.0 mmol/L
A/g Ratio			Chloride	mmol/L	96-107 mmol/L
RENAL PROFILE			MISCELLANEOUS		
Urea	mg/dL	15-45 mg/dL	Glucose Fasting	mg/dL	60-100 mg/dL
Creatinine	mg/dL	0.6-1.0 mg/dL	Glucose Random	mg/dL	80-120 mg/dL
Phosphorus	mg/dL	25-45 mg/dL	Uric Acid	mg/dL	3.0-7.5 mg/dL
CARDIAC PROFILE			Amylase	U/L	Upto 390 U/L
AST (GOT)	U/L	Upto 36 U/L	Calcium	mg/dL	9.10-10.4 mg/dL
LDH	U/L	Upto 460 U/L	THUROLD PROFILE		
CPK	U/L	Upto 195 U/L	T3		0.79-1.73 ug/dL
			T4		52-127 ng/ml
			TSH		0.6-2.0 mIU/ml

ATTESTE

Sig

ATTEST

[Signature]

[Signature]
59

59 PT

3.02 gms
Subs. R. & R. 8.45 in

High: Hcd = (-ve)
Non reactive

lbs Ag = (-ve)
Non reactive

26/9/11

(1)

(21)

22

DIHS-0203

OUT DOOR PATIENT TICKET

Sent To:

District:

CRP No:

Facility Name:

Name: Age: Sex:

Father's / Husband's Name:

Monthly OPD Serial No. 1237/

Provisional Diagnosis:

Date

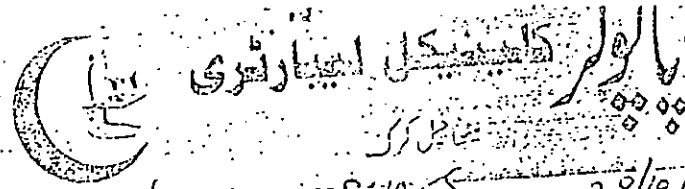
Clinical Findings / Investigations / Treatment / Referred / Test Findings

9/5 Fever
Fatigue
Pale
Yellow Sclera

Adm. 1. Tab Siloquin 1-DD
Hbs Ag 2. SyP Hepatitis 1-1-1
Anti Hcv 3. Tab Paracetol 1-1-1
St P.T. 4. Glaxone
Serum Bilirubin D, B, C, D
Adm.
Complete Bed Rest for
one month

ATTESTED

Popular
Clinical Laboratory



Mobile: 0312-3605545

Name: Mr. JAHID AH Age: 28 Sex: M Date: 28/10/11

Test Required: S.P.R Specimen: Serum

23

TEST	RESULT	REFERENCE VALUES	TEST	RESULT	REFERENCE VALUES
LIVER PROFILE					
Bilirubin Total	5.0 mg/dL	Upto 0-1.0 mg/dL	Total lipid	mg/dL	500-1000 mg/dL
Bilirubin Direct	mg/dL	Upto 0.3 mg/dL	Cholesterol	mg/dL	150-250 mg/dL
Bilirubin Indirect	mg/dL		Triglyceride	mg/dL	50-150 mg/dL
ALT(GPT)	U/L	Upto 40 U/L	H.D.L	mg/dL	<35 mg/dL
Alk. Phosphatase	U/L		L.D.L	Mg/dL	>160 mg/dL
Total Proteins	G/dL	6.0 to 8.0 G/dL	ELECTROLYTES		
Albumin	G/dL	3.5 to 5.0 G/dL	Sodium	mmol/L	136-149 mmol/L
Globulin	G/dL	2.0 to 3.0 G/dL	Potassium	mmol/L	3.0-5.0 mmol/L
A/g Ratio			Chloride	mmol/L	96-107 mmol/L
RENAL PROFILE					
Urea	mg/dL	15-45 mg/dL	Glucose Fasting	mg/dL	60-100 mg/dL
Creatinine	mg/dL	0.6-1.0 mg/dL	Glucose Random	mg/dL	80-120 mg/dL
Phosphorus	mg/dL	25-45 mg/dL	Uric Acid	mg/dL	1.3-7.0 mg/dL
CARDIAC PROFILE					
AST (GOT)	U/L	Upto 36 U/L	Amylase	U/L	Upto 300 U/L
LDH	U/L	Upto 460 U/L	Calcium	mg/dL	8.10-10.4 mg/dL
CPK	U/L	Upto 95 U/L	THUROLD PROFILE		
			T3		0.79-1.73 μg/dL
			T4		52-127 ng/mL
			TSH		0.6-4.5 mIU/ml

ATTESTED

[Signature]
SIR

24

Sent To:

OUT DOOR PATIENT TICKET

District

W.K.

CRP No:

Facility Name

Name

25/3

Age:

Sex:

Father's/Husband's Name

28-10-2011

Monthly OPD Serial No.

1855/-

Provisional Diagnosis:

Date

Clinical Findings / Investigations / Treatment / Referred / Test Findings

40 Hepatitis.

Jaundice

Rx - 1 Cap. Jetepaz
1-1-1

2- Tab Sil Liver

3- SyP ^{0.3} led complex

5- SyP ¹¹⁻¹¹ Eplazyme

6. C. ¹⁷⁻¹¹ _{W56}

Adv

Complete

Red host

Adv. n. M.S. 11.

[Signature]

ATTESTED

ATTACHED

8

1/11

54 PT - 94

Sound blower
69

1/11

28/11

11

25

**Popular
Clinical Laboratory**



کلینیکل لیبارٹری

26

Mob: 0332-9805646

Name

M. W. JAHID AG

Specimen

Date 17/11/18

Test Required

3BR

TEST	RESULT	REFERENCE VALUES	TEST	RESULT	REFERENCE VALUES
LIVER PROFILE					
Bilirubin Total	2.8 mg/dL	Upto 0-1.0 mg/dL	Total lipid	mg/dL	500-1000 mg/dL
Bilirubin Direct	mg/dL	Upto 0.3 mg/dL	Cholesterol	mg/dL	150-250 mg/dL
Bilirubin Indirect	mg/dL		Triglycerde	mg/dL	50-150 mg/dL
ALT(GPT)	U/L	Upto 40 U/L	H.D.L	mg/dL	>35mg/dL
Alk. Phosphatase	U/L		L.D.L	mg/dL	<100 mg/dL
Total Proteins	G/dL	6.0 to 8.0 G/dL	ELECTROLYTES		
Albumin	G/dL	3.5 to 5.0 G/dL	Sodium	mmol/L	130-140 mmol/L
Globulin	G/dL	2.0 to 3.0 G/dL	Potassium	mmol/L	3.0-5.0 mmol/L
A/g Ratio			Chloride	mmol/L	96-107 mmol/L
RENAL PROFILE					
Urea	mg/dL	15-45 mg/dL	Glucose Fasting	mg/dL	60-100 mg/dL
Creatinine	mg/dL	0.6-1.0 mg/dL	Glucose Random	mg/dL	80-120 mg/dL
Phosphorus	mg/dL	25-45 mg/dL	Uric Acid	mg/dL	1.3-4.7 or 2.4-5.7 mg/dL
CARDIAC PROFILE					
AST (GOT)	U/L	Upto 35 U/L	Amylase	U/L	Upto 390 U/L
LDH	U/L	Upto 460 U/L	Calcium	mg/dL	8.10-10.4 mg/dL
CPK	U/L	Upto 195 U/L	THUROLD PROFILE		
			T3		0.79-1.73 ug/dL
			T4		52-127 ng/ml
			TSH		0.6-4.5 u/ml

ATTESTE

SUN

ATTESTED

Adv. Billie (11/20/02)
 1. Cap Jolepa
 2. Sph. Leptok
 3. Glaxo
 Mrs. S. I. I. I.
 Adv. Campbell Red Front 202
 works

Clinical Findings / Investigations / Treatment / Refered / Test Findings

Date

Provisional Diagnosis:

Monthly OPD Serial No. 2230 /

Father's / Husband's Name

Name

Age: 28 /

Sex:

Facility Name

District

CRP No.

Sent to

OUT DOOR PATIENT TICKET

DHHS-02(7)

(5)

(27)

ATTEST

[Handwritten signature]

**Medical Officer
D.M.O. Hospital
Karnal**

[Handwritten signature]

Centred, Mr. Mustafa etc.
examined and found
fit for duty.

[Handwritten signature]

Chief Findings / Investigations / Treatment / Relief / Test Findings

Date

Provisional Diagnosis:

Monthly OPD Serial No. 02-12-2011

Father's / Husband's Name 30501-

Name Age: 28 / Sex:

Facility Name [Handwritten]

District [Handwritten] CRP No.:

OUTDOOR PATIENT TICKET

Ser. No. []

DHS-0200

28

[]

وکالت نامہ

بعدالت جناب سروس ٹریبونل
 مجاہد علی بنام حکومت گلگت بلتستان

علت: مورخہ تھانہ
 جرم: منجانب نفیس

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیروی و جوابدہی بمقام
 لیٹننٹ

شاہد نسیم خان چکنی ایڈووکیٹ ہائی کورٹ پشاور کو بدین شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظهر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام کچہری سے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے پانچ بجے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے، اگر مقدمہ علاوہ صدر کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کی ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار ہوں گے، مجھ کو کل ساختہ پر داختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کارروائی وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد ڈالشی و راضی نامہ کو فیصلہ پر خلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت اپیل برآمدگی مقدمہ یا منسوخ ڈگری یکطرفہ درخواست حکم اقامتی یا قری یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نامہ بیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا، یا مقدمہ مذکورہ یا اس کے کسی جزوی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرونی کو بجائے اپنے یا پانے ہمراہ مقرر کریں اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جائنہ التواء پڑے گا وہ صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ بھی صاحب موصوف کے برخلاف نہیں ہوگا، لہذا یہ مختار نامہ لکھ دیا تاکہ سند رہے۔

مورخہ: ۱۵/۱۵/۲۴ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد
 شاہد نسیم خان چکنی ایڈووکیٹ ہائی کورٹ پشاور
 آفس: دفتر نمبر TF49-50 تھرڈ فلور، ڈیزیز ٹریڈ سنٹر پشاور صدر
 کلر: فیاض الرحمان 0300-5886819

ایڈووکیٹ
 شاہد نسیم خان
 ایڈووکیٹ