


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

709/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/05/2024	<p>The appeal of Qazi Muhammad Nacem re-filed today by registered post through M.Arshad Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 26.06.2024. Counsel for the appellant has been informed telephonically.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>


Respected Sir,

It is submitted that the present appeal was received on 01.04.2024, which was returned to the counsel for the appellant for removing objection (Flag-A). Today i.e. 08.05.2024 the learned counsel re-filed the appeal through registered post without removing the objection no.1, 4 & 6.

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.


REGISTRAR 8/5/24


Hon'ble Member (J).

time for submission of better
copy of p. 24 and for removal
of unnecessary party. Re submit
it with seven days. 
13/5/24

No: 38 / Inst: 24 / KPST
Dated 15/5/2024

Sir. file received on 20 May 2024.
objection as desired has
been removed

22/5/24




The appeal of Qazi Muhammad Naseem received today i.e on 01.04.2024 is incomplete on the following score which is returned to the counsel for the appellant 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 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- Copy of lower course certificate dated 15.6.2021 mentioned in para-4 of the memo of appeal is not attached with the appeal be placed on it.
- 3- Copy of promotion order mentioned in para-6 of the memo of appeal is not attached with the appeal be placed on it.
- ④ Copy of impugned order is not attached with the appeal be placed on it.
- 5- Annexures of the appeal are not in sequence.
- ⑥ Page no. 24 of the appeal is illegible which may be replaced by legible/better one.
- 7- Copy of amended memo appeal also be provided to spare copies.

No. 726 /S.T.

Dt. 2-4 /2024.


REGISTRAR 2/4/24
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Arshad Khan Tanoli Adv.
High Court A.Abad.

Sir,
It is submitted that
respondant No 3 is a
unnecessary party. Rest
of the objection have been
removed as desired. However
it is submitted that said file
was received 
on 22/4/2024
3/5/2024

BEFORE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 709 -A/2024

Qazi Muhammad Naseem LHC (No. 271), District Police, Mansehra.

...APPELLANT

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

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S.#	Description	Page No.	Annexure
1.	Service Appeal along with affidavit	1 to 8	
2.	Copy of appointment order dated 20/11/2003	9	"A"
3.	Copy of service appeal and judgment dated 18/09/2017 of this Honourable Tribunal	10-17	"B"
4.	Copy of order dated 28/12/2020	18	"C"
5.	Copies of Lower School pass course	19-20	"D"
6.	Copy of promotion order of junior to the appellant	21-22	"E"
7.	Copy of the departmental representation	23-24	"F"
8.	Wakalatnama	25	

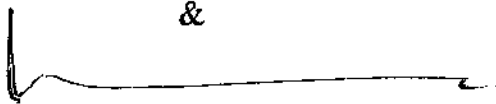
...APPELLANT

Dated: _____/2024

Through;


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&


(Muhammad Ibrahim Khan)
Advocate High Court Abbottabad

BEFORE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 709 - 11/2024

Qazi Muhammad Naseem LHC (No. 271), District Police, Mansehra.

...APPELLANT

VERSUS

1. Regional Police Officer, Hazara Abbottabad.
2. District Police Officer, Mansehra.

....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT WAS ELIGIBLE FOR LOWER
SCHOOL COURSE IN THE YEAR 2010 BUT THE
APPELLANT WAS NOT SELECTED AND
DETAILED TO COMPLETE THE SAID COURSE IN
TIME BY RESPONDENT'S DEPARTMENT AS A
RESULT, THE RESPONDENTS' DEPARTMENT
FINALLY DECLARED THE APPELLANT AS OVER
AGED. HENCE, THE APPELLANT FILED SERVICE
APPEAL NO. 1610/2010 BEFORE THIS
HONOURABLE TRIBUNAL WHICH WAS DECIDED

SELECTED FOR LOWER COURSE VIDE ORDER DATED 10/01/2021 AND THEREAFTER THE APPELLANT COMPLETED/ PASSED LOWER COURSE ON 15/06/2021 BUT THE APPELLANT HAS NOT GIVEN SENIORITY W.E.F 31/03/2010 WHICH IS PERVERSE, DISCRIMINATORY AND AGAINST THE LAW AND THE RESPONDENTS' DEPARTMENT IS SUPPOSED TO ALLOW SENIORITY TO THE APPELLANT FROM THE DATE OF HIS BATCH MATES OF 2010. HENCE, THE APPELLANT IS ENTITLED FOR PROMOTION AS WELL AS COURSES ALONGWITH HIS BATCH MATES OF 2010.

PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL THE RESPONDENTS' DEPARTMENT MAY BE DIRECTED TO FIX SENIORITY OF THE APPELLANT W.E.F 31/03/2010 WHEN THE LOWER COURSE WAS DUE AND NOT FROM DATE OF PASSING OF LOWER COURSE EXAMINATION/ COURSE. WITH FURTHER PRAYED THAT THE APPELLANT MAY BE PROMOTED WITH HIS BATCH MATES OF 2010 WITH ALL SERVICE BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE

TRIBUNAL DEEM FIT AND APPROPRIATE IN THE
CIRCUMSTANCES OF THE CASE MAY ALSO BE
GRANTED TO THE APPELLANT.

Respectfully Sheweth:-

That facts forming the backgrounds of the instant service
appeal are arrayed as under:-

1. That the appellant was appointed as constable on
20/11/2003. Copy of appointment order dated
20/11/2003 is attached as Annexure "A".
2. That the appellant has qualified his B-I
examination and was placed at serial No. 37 of
the merit list of selection for lower school course
in the year 2010. Merit list showing the appellant
at serial No. 37 for selection in lower school
course in the year 2010 but he was not selected
fro the said course vide notification dated
31/10/2010. As a result the appellant filed service
appeal No. 1610/2010 before this Honourable
Tribunal which was decided on 18/09/2017. Copy
of service appeal and judgment dated 18/09/2017
of this Honourable Tribunal is attached as
Annexure "B".

3. That the respondents' department following the judgment dated 18/09/2017, send the appellant from lower school course Vide order dated 28/12/2020. Copy of order dated 28/12/2020 is attached as Annexure "C".
4. That the appellant successfully completed the lower school course on 15/06/2021. Copies of Lower School pass course is attached as Annexure "D".
5. That the respondent, department was supposed to grant seniority to the appellant from the date initially 31/03/2010 but the respondent, department has taken different view wherein it was stated by the department that the seniority of the appellant shall be fixed from passing of lower school course which is illegal. And against the law the department was supposed to send the appellant to lower school course on 31/03/2010. In the entire episode, the appellant was not at fault but it is due to negligent attitude/behaviour of the department. The appellant was send for the lower school course on 28/12/2020 which should have been w.e.f 31/03/2010.

6. That the appellant has been shown junior to his batch mates fellows who have been promoted to next higher rank of Assistant Sub-Inspector. Copy of promotion order of junior to the appellant is attached as Annexure "E".

7. That feeling aggrieved, the appellant filed departmental appeal to respondent No. 2 but same has not been redressed so far. Copy of the departmental representation is attached as Annexure "F". Hence, the instant service appeal is filed inter-alia on the following grounds:-

GROUND: -

a) That as per judgment dated 08/09/2017 of this Honourable Tribunal the respondent's department send the appellant for the Lower School Course in the year 2021 which should have been in the Year 2010.

b) That the appellant was not at fault but it due to negligence mistake of the department. Therefore, negligence and mistakes of the

department can not give service loss to the appellant.

c) That the matter relates to the term and condition of service. Hence this Honourable Tribunal has jurisdiction to entertain the service appeal of the appellant.

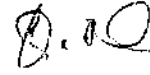
d) That the instant service appeal is well within the period of limitation.

e) That the valuable rights of the appellant are involved.

f) That other points shall be urged at the time of arguments.

It is therefore, most humbly prayed that on acceptance of instant service appeal the respondents' department may be directed to fix seniority of the appellant w.e.f 31/03/2010 when the lower course was due and not from date of passing of lower course examination/ course. With further prayed that the

appellant may be promoted with his batch mates of 2010 with all service back benefits. Any other relief which this Honourable Tribunal deem fit and appropriate in the circumstances of the case may also be granted to the appellant.




...APPELLANT

Through;

Dated: _____/2024


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan
&


(Muhammad Ibrahim Khan)
Advocate High Court Abbottabad

VERIFICATION: -

Verified that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein.



...APPELLANT

BEFORE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ -A/2024

Qazi Muhammad Naseem LHC (No. 271), District Police, Mansehra.

...APPELLANT

VERSUS

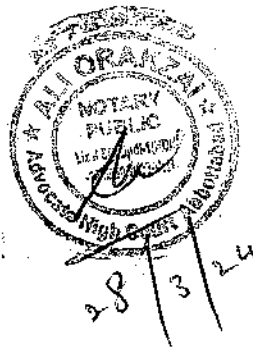
Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Qazi Muhammad Naseem LHC (No. 271), District Police, Mansehra*, do hereby solemnly affirm and declare that the contents of forgoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



Qazi
DEPONENT



Annex - A

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POLICE DEPARTMENT

MANSEHRA DISTRICT

ENLISTMENT ORDER

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In compliance of IGP NWFP signal No. 22412-63 dated 6-11-2003, I being
 appointing authority of junior ranks as laid down in para 23 of police order 2002 enlist
 Mr. Ghazi Mohamad Aslam Son of Ghazi Mohamad Aslam
 Caste Awan Resident of village Hatti Mera Mohallah X
 Police Station Shambian Tehsil Mansehra District Mansehra
 as A constable in Basic Pay Scale No. 5 (Rs:1400-66-2390) at
 the rate of Rs: 2100/- per month with effect from 20-11-2003
 He is allotted constabulary No 2398

His enlistment is merely on temporary basis and will be liable to be terminated at any time without any notice.

Height: 5-7 1/2
 Chest: 36 x 38
 Education: B.A
 Date of Birth: 1-1-1973
 Order Book No: 324
 Dated: 21-11-2003

[Handwritten signatures]

[Signature]
 District Police Officer,
 Mansehra.

Annex-B P-80

BEFORE SERVICES TRIBUNAL KPK PESHAWAR

RECEIVED
SERVICES TRIBUNAL
KPK PESHAWAR

Service No. 1731
Date 26/3/10

Qazi Muhammad Naseem son of Qazi Muhammad Aslam resident of Post Office Gandhian, village Hathi Maira, No. 271 at present constable PS Baffa, District Manshehra.
...APPELLANT

VERSUS

1. Government of K.P.K through secretary interior Peshawar.
2. Inspector General of Police K.P.K Peshawar.
3. Deputy Inspector General of Police Hazara, Abbottabad.
4. District Police Officer, Manshehra.

... RESPONDENTS
26-4-10

APPEAL AGAINST THE ORDER DATED 06/04/2010
PASSED BY THE DEPUTY INSPECTOR GENERAL OF
POLICE HAZARA ABBOTTABAD WHEREBY THE
RESPONDENT NO. 3 INSTEAD OF SELECTING THE
APPELLANT FOR LOWER CLASS COURSE
RECOMMEND/REFERRED THE MATTER TO THE
RESPONDENT NO. 2.

Attested
[Signature]

Muhammad Arshad Khan Tarelli
Advocate Supreme Court of Pakistan
Office # 23 Jinnah Plaza Adjacent to
District Bar Abbottabad

PRAYER: ON ACCEPTANCE OF THIS APPEAL THE
RESPONDENTS BE DIRECTED TO PASS AN ORDER

Attested
[Signature]

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FOR SELECTION OF THE APPELLANTS FOR THE COURSE OF LOWER CLASS.

Respectfully Sheweth

Attested

[Signature]

1. That the appellant joined the service in Police Department on 21/11/2003, and since then the appellant is serving the Department honestly and with dedication.

2. That the department took the examination for the course of lower class in which the appellant also participated.

3. That as per the result of the examination the appellant also passed B-I examination.

Attested

[Signature]
Muhammad Arshad Khan Tanoli
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Khasani to
District Bar Abbottabad

4. That despite the fact that the appellant was declared successful in examination but was not selected for the course of lower class.

5. That the appellant submitted an application before the DIG of Police Hazara Abbottabad through District Police Officer Mansehra for the selection of lower

P-8 12

7

class course. Copy of application is annexed as Annexure "A"

6. That the DIG of police Hazara Abbottabad instead of selection of the appellant for the course of lower class constables recommended the matter to the Inspector General of police KPK Peshawar.

Alleged

7. That the appellant after 06-04-2010, when through the impugned order the case of the appellant was referred/recommended to respondent No. 3, who contacted respondent No. 3, but no answer/decision has been given.

Mirza

8. That the appellant submits this appeal before this Honourable Tribunal inter-alia on the following grounds:-

GROUNDS:-

Attested

a. That the appellant is serving the Department for the last 7 years with honesty and dedication.

Mirza
Advocate
Office # 33 Jinnah Plaza Adjacent to
Diana Bar Abbottabad

b. That the appellant has passed the examination of B-I which is a pre-requisite for the course of lower class.

(8)

c. That in case the appellant is not selected for the course of lower class then the appellant will become average, as the date of birth of the appellant is 01-01-1978.

d. That even on the humanitarian grounds the appellant is entitled for the selection of the lower class course.

It is, therefore, humbly prayed that on acceptance of this appeal the respondents be directed to select the appellant for the lower class course.

Dated: 01-08-2010

Through

(SAJJAD AHMED ABBASI)
Advocate High Court, Abbottabad

APPELLANT

VERIFICATION

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

APPELLANT

Attested

Attested

Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
Dist. Bar Abbottabad

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BEFORE SERVICES TRIBUNAL KPK, PESHAWAR



Appeal no. 1610/10

A.W.N. Service Tribunal
Entry No. 173
Date 06/8/10

Qazi Muhammad Naseem son of Qazi Muhammad Aslam resident of Post Office Gandhian, village Hathi Maira, No. 271 at present constable PS Baffa, District Mansehra.

...APPELLANT

VERSUS

Attested

1. Government of K.P.K through secretary interior Peshawar.
2. Inspector General of Police K.P.K Peshawar.
3. Deputy Inspector General of Police Hazara, Abbottabad.
4. District Police Officer, Mansehra.

Attested

... RESPONDENTS

Attested

Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
District Bar Abbottabad

Attested
6/8/10

APPEAL AGAINST THE ORDER DATED 06/04/2010 PASSED BY THE DEPUTY INSPECTOR GENERAL OF POLICE HAZARA ABBOTTABAD WHEREBY THE RESPONDENT NO. 3 INSTEAD OF SELECTING THE APPELLANT FOR LOWER CLASS COURSE RECOMMEND/REFERRED THE MATTER TO THE RESPONDENT NO. 2.

It is submitted to you and filed.

Attested
19/8/10

PRAYER:- ON ACCEPTANCE OF THIS APPEAL THE RESPONDENTS BE DIRECTED TO PASS AN ORDER

Attested

Annex- "B" P-15

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP COURT ABBOTTABAD

Service Appeal No. 1610/2010

Date of Institution... 06.08.2010

Date of decision... 18.09.2017



Qazi Muhammad Naseem S/O Qazi Muhammad Aslam
R/O Post Office Gandhian, village Hathi Maira, No. 2 at present Constable PS
Baffa, District Mansehra. (Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Interior, Peshawar
and 3 others. (Respondents)

MR. SAJJAD AHMED ABBASI,
Advocate

... For appellant.

MR. MUHAMMAD BILAL
Deputy District Attorney

... For respondents.

MR. NIAZ MUHAMMAD KHAN,
MR. MUHAMMAD AMIN KHAN KUNDI,

... CHAIRMAN
... MEMBER

Handwritten signatures and initials.

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned
counsel for the parties heard and record perused.

FACTS

2. The appellant was recruited as Constable on 20.11.2003. According to service
record his date of birth is 01.01.1978. He appeared for B-I Examination which he
qualified and his name appeared in the merit list of the said examination at S.No. 33 in
the year, 2010. But he was not selected for lower school course in the notification issued
on 31.3.2010. The D.I.G Hazara Region, thereafter wrote a letter dated 06.04.2010 to the
Provincial Police Officer for allotment of extra seats for the lower schools course for
Hazara Region so that the appellant alongwith 35 others might be selected for the said

Attested
Advocate Supreme Court of Pakistan
Office: Jinnah Plaza adjacent to
District Sar Abbotsabad

ATTESTED
Signature
Secretary

qualified candidates is to be made on the basis of merit or on the basis of age. Rule 13.7 of the Police Rules says that ordinary seniority in age shall be given prior consideration in making such selections, irrespective of the date of admission to the list, and care must be taken that a constable borne on the list is not allowed to become over age for admission to the school being selected. It is clear from this rule that while making the list, the age is given priority over merit if older in age is likely to become over age in that year, otherwise the merit is a normal rule. This stance of the appellant is further supplemented by the letter of DIG dated 06.04.2010 which supported the case of 36 persons including the present appellant but the PPO while issuing order dated 12.05.2010 nominated four persons and in these four persons, two persons namely Muhammad Shakeel and Amir Malak are younger than the present appellant to which the learned DDA replied that the reason for including these two persons was that they were senior in merit. This argument is not plausible because Rule 13.7 as discussed above gives priority to persons who are likely to become over age. In such situation and specially when the order dated 12.5.2010 was passed for adjustment of over age quota, the appellant was entitled to have been placed in the over age quota in preference to other two persons mentioned above.



Shakeel
Amir

6. Coming to the departmental appeal of the present appellant dated 07.04.2010, there is no mention of letter dated 06.04.2010. It is generally mentioned in the said departmental appeal that as the appellant was becoming over age, therefore, he should be selected in the said course. The mentioning of order dated 06.04.2010 in the heading of appeal before this Tribunal would not be taken to diminish his legal right on hyper technical ground because otherwise, his departmental appeal is well within time being preferred after four days of the notification dated 31.03.2010. This technically should not come in the way of substantial justice if otherwise, the appellant has timely approached the authority for redressal of his grievance.

4 days
earlier
in
Service
Tribunal

Attested
Muhammad Arshad Khan
Advocate Supreme Court of Pakistan
Office: Minar Plaza Adjacent to
District Bar Abbottabad

ATTESTED
[Signature]
Secretary
Service Tribunal

Annexure

P-18

POLICE DEPARTMENT

HAZARA REGION ABBOTTABAD

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA GAZETTE PART-II
ORDERED BY THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD

NOTIFICATION

Dated: 28/12 /2020

NO. 34664 / E, ADMISSION TO PROMOTION LIST B-I:- In compliance with the judgment of Service Tribunal Khyber Pakhtunkhwa, Camp Court Abbottabad dated 18-09-2017 and directives issued by CPO vide letter No.4147/E-IV dated 13-03-2020, the name of Constable Qazi Muhammad Naseem No.271 of Mansehra District is admitted to promotion list B-I with effect from 01-01-2021.

J. Anwar
Regional Police Officer
Hazara Region Abbottabad

No. 34662-65 / E.

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

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar w/r to his office letter No. quoted above.
2. Deputy Inspector General of Police, Training Khyber Pakhtunkhwa Peshawar.
3. Commandant, Police Training College, Hangru.
4. District Police Officer Mansehra w/r to his office Memo: No.24432/SRC dated 10-12-2020.

J. Anwar
Regional Police Officer
Hazara Region Abbottabad

A. M. Sheikh
Regional Police Officer
Hazara Region Abbottabad

To: The Deputy Inspector General of Police
 Hazara Abbottabad

Annex-D

The provincial police Office
 NWFP Peshawar

P-19

No. 4298/2/E dated Abbottabad, 06/04/2010

Subject: PROVISION OF EXTRA SEATS FOR LOWER CLASS COURSE OF
 OVERAGE B-I QUALIFIED CANDIDATES

Memorandum

The following constables of this region are becoming overage. If not selected during this term. They have qualified B-I examination during the current year 2010 but have not come within the limit of notification of B-I constables in accordance with marking seniority. Their particulars as under:

S	District	Name & No. of Constables	Merit Position	Sanction quota per-term	Date of birth	Age on 01-04-2010		
						Years	Month	Days
1	Haripur	Syed Zahoor Shain No. 224	13	06	25/04/1977	32	11	16
2		Saif-ur-Rehman No. 298	21	06	04/01/1978	32	02	27
3		Muhammad Nazir No. 439	24	06	13/08/1977	32	07	18
4		Shahid Mehmood No. 211	26	06	15/03/1978	32		16
5		Mustafa No. 705	31	06	01/03/1978	32		30
6		Tanveer Hussain No. 310	35	06	20/02/1978	32	01	11
7	Abbottabad	Shahid No. 71	21	09	10/05/1977	32	10	21
8		Muhammad Zaheer No. 109	32	09	16/03/1978	32		15
9		Jamil Khan No. 1173	36	09	04/02/1978	32	01	27
10		Tanveer Hussain No. 852	44	09	22/04/1977	32	11	29
11		Naseem Gul No. 428	46	09	04/02/1978	32	01	27
12		Rashid Sadiq No. 340	51	09	01/08/1978	32	08	
13		Abid Mehmood No. 1157	52	09	13/01/1978	32	02	18
14		Muhammad Ashfaq No. 53	55	09	01/12/1977	32	04	
15		Sardar Kaleem Dad No. 912	56	09	20/04/1977	32	11	11
16		Jamshaid Khan No. 256	58	09	31/03/1978	32		
17		Khan Muhammad No. 874	59	09	03/05/1977	32	10	28
18	Afzaish Riaz No. 345	63	09	29/06/1977	32	09	02	
19	Shah Nawaz No. 1084	64	09	01/01/1978	32	03		
20	Rizwan Khan No. 1177	65	09	07/07/1977	32	08	24	
21	Mardan	Muhammad Zarid No. 608	21	06	10/08/1977	32	07	19
22		Muhammad Zaheer No. 107	23	06	15/11/1977	32	04	16
23		Muhammad Saeed No.	24	06	15/11/1977	32	04	16

30	Battagram	Oazi Nuseem No. 271	35	06	01/01/1978	32	02	27
31		Muhammad Tariq No. 26	36	06	05/19/1978	32	02	26
32	Kohistan	Abdul Khaliq No. 215	42	06	04/05/1977	32	16	27
33		Muhammad Azam No. 710	51	06	01/09/1977	32	06	30
34		Bashir No. 121	20	03	16/03/1978	32		11
35		Gul Naima Shah No. 269	21	03	12/02/1978	32	01	19
36		Jamshaid No. 173	22	03	20/05/1977	32	10	21
37		Nazir Muhammad No. 198	25	03	05/06/1977	32	09	26
38	Kohistan	Sarfaraz No. 70	15	05	10/02/1978	32	01	21
39		Muhammad Aamir No. 140	21	05	07/01/1978	32	02	24
40		Faraz Hussain Saha No. 433	28	05	01/08/1977	32	08	
41		Syed Aziz No. 392	29	05	01/04/1978	32	03	
42	Kohistan	Naik Muhammad No. 429	36	05	04/06/1977	32	10	

It is therefore requested that above mentioned extra seats in Lower Class Course may kindly be allotted to this Region so that the above named constables could be selected for the subject course.

Sd/
District Inspector General Of Police
Hazara (Abbottabad)

[Handwritten signature]

Office of the District Inspector General of Police
[Handwritten signature]

دستگیر اور کار ملازمت
اس میں ایس میں
Seats 125
کلی

Annex-E

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BETTER COPY

POLICE DEPARTMENT

HAZARD REGION ABBOTTABAD

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA GAZETTE PART- II
ORDERED BY THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD

Dated 28-12-2020

NOTIFICATION

No 34661/E **ADMISSION TO PROMOTION LIST B I** :- In compliance with the judgment of Service Tribunal Khyber Pakhtunkhwa Camp Court Abbottabad dated 18-9-2017 and directives issued by CPO vide letter No 4147/E-IV dated 13-3-2020 the name of Constable Qazi Muhammad Naseem No 271 of Mansehra District is admitted to promotion list B I w.e.f 01-01-2021 .

-SD-

Regional Police Officer,
Hazard Region Abbottabad

No. 34662-65/E,

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

- 1: Provincial Police Officer , Khyber Pakhtunkhwa , Peshawar w/r to his office letter No quoted above.
- 2: Deputy Inspector General of Police Training Khyber Pakhtunkhwa Peshawar .
- 3: Commandant Police Training College Hangu.
- 4: District Police Officer Mansehra w/r to his office memo No 24432/SRC dated 10-12-2020.

-SD-

Regional Police Officer,
Hazard Region Abbottabad

Attested

[Signature]

The Deputy Inspector General of Police
Muzaira Abbottabad

Annex - E

The provincial police Office
NAWAL Peshawar

P-21-A

No. 4298/E dated Abbottabad dated 06/04/2010

Subject: PROMISION OF EXTRA SEATS FOR LOWER CLASS COURSE OF
OVERAGE B-I QUALIFIED CANDIDATES.

Memorandum

The following constables of this region are becoming overage if not selected during this term. They have qualified B-I examination during the current year 2010 but have not come with in the limit of notification of B-I constables in accordance with marking seniority.

Their particulars as under

S. No.	District	Name & No. of Constables	Merit Position	Sanction quota per term	Date of birth	Age on 01-04-2010		
						Years	Month	Days
1	Haipur	Syed Zahoor Shain No. 224	13	06	25/04/1977	32	11	16
2		Saif-ur-Rehman No. 298	21	06	04/01/1978	32	02	27
3		Muhammad Nazir No. 439	24	06	13/08/1977	32	07	18
4		Shahid Mehmood No. 211	26	06	15/03/1978	32		16
5		Mustafa No. 705	31	06	01/03/1978	32		30
6		Tanveer Hussain No. 310	35	06	20/02/1978	32	01	11
7	Abbottabad	Shahid No. 71	21	09	10/05/1977	32	10	21
8		Muhammad Zahcer No. 109	32	09	16/03/1978	32		15
9		Jamil Khan No. 1173	36	09	04/02/1978	32	01	27
10		Tanveer Hussain No. 852	44	09	22/04/1977	32	11	29
11		Naseem Gul No. 428	46	09	04/02/1978	32	01	27
12		Rashid Sadiq No. 340	51	09	01/08/1978	32	08	
13		Abid Mehmood No. 1157	52	09	13/01/1978	32	02	18
14		Muhammad Ashfaq No. 53	55	09	01/12/1977	32	04	
15		Sardar Kaleem Dad No. 912	56	09	20/04/1977	32	11	11
16		Jamshaid Khan No. 256	58	09	31/03/1978	32		
17	Khan Muhammad No. 874	59	09	03/05/1977	32	10	28	
18	Afzaish Riaz No. 345	63	09	29/06/1977	32	09	02	
19	Shah Nawaz No. 1084	64	09	01/01/1978	32	03		
20	Rizwan Khan No. 1177	65	09	07/07/1977	32	08	24	
21	Muhammad Zarid No. 608	21	06	10/08/1977	32	07	19	
22	Muhammad Zahcer No. 107	23	06	15/11/1977	32	04	16	
23	Muhammad Saeed No.	24	06	15/11/1977	32	04	16	

Manshra

30	Baltagram	Qazi Nuseem No. 271	35	06	01/01/1978	32	0	30
31		Muhammad Tariq No. 226	36	06	05/19/1978	32	02	26
32	Kohistan	Abdul-Khalig No. 215	42	06	04/05/1977	32	16	27
33		Muhammad Azam No. 710	51	06	01/09/1977	32	06	30
34		Bashir No. 121	20	03	16/03/1978	32		15
35		Gul Naimat Shah No. 269	21	03	12/02/1978	32	01	19
36		Jamshaid No. 173	22	03	20/05/1977	32	10	21
		Nazir Muhammad No. 198	25	03	05/06/1977	32	09	26
		Sarfraz No. 70	15	05	10/02/1978	32	01	21
		Muhammad Aamir No. 140	21	05	07/01/1978	32	02	24
	Faraz Hussain Saha No. 433	28	05	01/08/1977	32	08		
	Syed Aziz No. 392	29	05	01/04/1978	32	03		
	Naik Muhammad No. 429	36	05	04/06/1977	32	10		

It is therefore, requested that above mentioned extra seats in Lower Class Course may kindly be allotted to this Region so that the above named constables could be selected for the subject course.

Ali Shah

Sd/-
District Inspector General Of Police
Hazara (Abbottabad)

Ali Shah

درستی اور غامض
اس میں
seats 125
- 10

Annex - F

بخدمت جناب RPO صاحب ہزارہ ریجن ایبٹ آباد

P-23

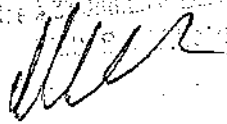
جناب عالی!

گزارش ہے کہ سائل نے سال 2010ء میں محکمہ امتحان برائے B-1 لوئر کورس کے لیے پاس کیا لیکن سائل لوئر کورس کے لیے منتخب نہ ہو سکا اور راج ہو گیا اور سائل نے سروس ٹریبونل میں سال 2010ء میں اپیل دائر کر دی۔ سروس ٹریبونل سے مورخہ 18/09/2017 کو سائل کے حق میں فیصلہ ہوا۔ فیصلہ کی کاپی ہمراہ لف ہے۔

عدالت نے سائل کے حق میں سال 2010ء سے جملہ حقوق دینے کا حکم صادر فرمایا۔ سائل کو اس کے باوجود عرصہ تین سال جنوری 2021ء کے پہلے ٹرم میں کافی تگ و دو کے بعد لوئر کورس کے لیے بھجوا یا گیا۔ سائل نے ماہ جنوری 2021 کو لوئر کورس پاس کر لیا چونکہ عدالت سروس ٹریبونل نے واضح حکم دیا کہ سال 2010ء کے تحت جملہ حقوق دینے جائیں جو میرے ساتھ جملہ امیدواران جنہوں نے سال 2010ء میں B-1 کا امتحان پاس کیا تھا انہوں نے انٹر میڈیٹ کورس سال 18-2017ء میں مکمل کر لیا ہے اور سال 23-2023ء میں ASI ہو گئے ہیں۔ چونکہ عدالت نے سائل کی سال 2010ء والی اپیل کو منظور کیا ہے اس کے مطابق میرا بھی حق بنتا ہے کہ سائل کو 2010ء والوں کے ساتھ شامل کر کے ASI کا حکم صادر فرمایا جائے اور مجھے ہیڈ کنسٹیبل پروموٹ کر کے سال 2010ء والوں کی سینارٹی لسٹ / میرٹ لسٹ میں شامل کیا جائے اور مجھے بھی سال 2010ء والی سینارٹی دی جائے اور مجھے ان کے ساتھ ASI پروموٹ کرنے کا حکم صادر فرمایا جائے۔



سائل آپ کے لیے دعا گو ہے گا۔



العارض

قاضی محمد نسیم LHC، پلاٹ نمبر 271 متعینہ اینٹی کرپشن تھانہ مانسہرہ

المرقوم: 30/11/2023

30/11/2023

13-7 List B. Selection of candidates for admission to courses at the Police Training School.—List B (in Form 13-7) shall also be maintained by each Superintendent of Police and shall be divided into two parts :—

- (1) Lower School course at the Police Training School.
- (2) Constables (selection or time scale) considered suitable for drill and other special courses at the Police Training School.

(A)

Selection shall be made from this list as vacancies occur for admission to the courses concerned at the Police Training School, provided that no constable shall be considered eligible for any such course until the entry of his name in list 'B' has been approved by the Deputy Inspector-General of the Range. Ordinary seniority in age shall be given prior consideration in making such selections, irrespective of the date of admission to the list, and care must be taken that a constable borne on the list is not allowed to become over age for admission to the school before being selected. The restrictions on admission to the lower school course and instructors' courses at the Police Training School limit the conditions for admission to List B. ~~No constable~~ No constable shall be admitted to that list whose age is such that he cannot in the normal case be sent to the Training School before he attains the age of 30 years. No constable, who has failed to qualify at the Training School, shall be re-admitted to the list unless the Superintendent and the Principals of the School are in agreement that he is deserving of another chance of qualifying in the course; in the event of disagreement as to such a case the Deputy Inspector-General shall decide.

PROMOTIONS

Comp. III

COMMENTS

No. S.O. (H) 1 (1) - 4/72. - In exercise of the powers conferred by section 46 of the Police Act, 1861 (Act of 1861), the Governor of Baluchistan is pleased to direct that in the Punjab Police Rules, 1934, in their application to the province of Baluchistan, following further amendment shall be made, namely :—

In rule 13.7, for the figure "(30)" appearing between the words attains the age of and word "years" the figure "33" shall be substituted.

