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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR


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M. Wajid Mehmood VS Police Department

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Muharrir/Compilation


28/5/24
Incharge Judicial Branch

816. Munir Khan s/o: Sardar Khann Excise deptt
 817. Hazrat Hilal Finance deptt
 818. Abid Khan Abid s/o: Abdul Marjan CM deptt
 819. Kashif Hussain s/o: Rizq Hussain PHE deptt
 820. Qamar zaman s/o: Muhammad zaman State office
 821. Jamshed Alam s/o: Zafar Alam E & AD deptt
 822. Asmat Ullah Khan s/o Hazrat Ali Khan Finance deptt
 823. Ahsan Ullah s/o: aman ullah Agriculture deptt
 824. Muhammad Hassan s/o: Taj Muhammad Finance deptt
 825. Habib Rizwan s/o Nizam ud din Finance deptt
 826. Iftilhar Ahmad Finance deptt
 827. Ihsan Ullah s/o: Shah Zada Khan Finance deptt
 828. Tahsin Ullah s/o: Mir Adam Khan Relief deptt
 829. Abdul Wahab s/o: Fazlur Rahim governor Sectt
 830. Muhammad Amjad s/o: Aurangzeb Awan E & AD deptt
 831. Syed Ihsanullah Shah s/o: Mubarak Shah Health deptt
 832. Shahab ud Din s/o: Sher Zada Mineral Dev deptt
 833. Uzma d/o: Shahjehan E & D deptt
 834. Zahir Ahmad s/o: Munir Ahmad Irrigation deptt
 835. Muhammad Irshad s/o: Mehmood Khan E & Admn
 836. Muhammad Farooq s/o: Muhammad Naseem Agriculture deptt
 837. Amir ul Haq s/o: Bakhtoor Khann Finance deptt
 838. Rizq Khan s/o: Ziarat Gul account section
 839. Muhammad Yaqub s/o: Muhammad Nawaz Administration deptt
 840. Irfan Ullah s/o: Zar Gul Fida Law deptt
 841. Muhammad Zubair Khan s/o: Mumtaz Ghani E & Ad deptt
 842. Saifeem Ullah Khan s/o: Ihsan Ullah Health deptt
 843. Hukam Khan s/o: Ayoob Khan E & Ad deptt
 844. Imran Nabi s/o: Hazrat Nabi Industries deptt
 845. Anwar zaib s/o: Muhammad Ullah E & AD deptt
 846. Shahid Khan s/o: Qandahar Khan E & Ad deptt
 847. Hawas Ali s/o: Munkid Ali Health deptt
 848. Shams ul Haq s/o: Ghulam Hussain Finance deptt
 849. Shams ud Din s/o: Qazi Sultan Muhammad Finance deptt
 850. Noor ul Islam s/o: Noor Muhammad E & AD deptt
 851. Sardar Dawood s/o: Ziarat Ghulam E & AD deptt
 852. Yousaf ur Rahman s/o: Yousaf Balg Finance deptt
 853. Muhammad Matloob s/o: Muhammad Suleman E & Ad deptt
 854. Naveed Ullah s/o: Salf Ullah Kp- PSRA
 855. Fakhr ud Din s/o: Salf Ullah Health deptt
 856. Syed Zeeshan Shah s/o: Syed Iqbal Shah KP- PSRA
 857. Nisar Ahmad s/o: Abdul Azeem Administration Deptt
 858. Yunas bacha Irrigation deptt
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 860. Mujeeb ur Rahman s/o: farman Ali Auqaf deptt
 861. Haidar Rasheed s/o: Abdur Rashid Health deptt
 862. Muhammad Yasir s/o: Muhammad Qasim Law deptt
 863. Asghar Ali s/o: Nawab Khan Health deptt
 864. Fazal Ahmad s/o: Sahibzada E & AD deptt
 865. Sama bukhari d/o: Khalid Mehmood E & SE deptt
 866. Irfanullah s/o: Muhammad Afzal Law deptt
 867. Dania Khan s/o: Gul Amin Home deptt
 868. Saleem Ahmad Shah
 869. Sultan Muhammad Superintendent Home Dept Peshawar
 870. Rofed Ullah Khan Superintendent Law Dept Peshawar
 871. Jan Nisar
 872. Mustajab Khan
 873. Amanullah s/o: Sald ali Jan
 874. Dilshad Khan Superintendent E & SE Dept Peshawar
 875. Zulfiqar Ali Superintendent P & D Dept Peshawar
 876. Khalil Khan Superintendent Home Dept Peshawar
 877. Imtiaz Ali Superintendent Home Dept Peshawar
 878. Khalid Hayat Superintendent Finance Dept Peshawar
 879. Atta Khan Superintendent Higher Edu Dept Peshawar
 880. Haidm Ullah Superintendent Finance Dept Peshawar
 881. Muhammad Ilyas Superintendent E & AD Dept Peshawar
 882. Ali Halder Superintendent Home Dept Peshawar
 883. Muhammad Farid s/o: Aziz ur Rahman
 884. Abdur Razaq Superintendent ST & ET Dept Peshawar
 885. Muhammad Fafique s/o: Fazle Ahmad Superintendent finance Dept Peshawar
 886. Hazrat Shah s/o: Niqab Shah Superintendent population Dept Peshawar
 887. Jauhar Akbar Superintendent population Dept Peshawar
 888. Pervez Ahmad Superintendent E & ED Dept Peshawar
 889. Abdul Latif s/o: Abdul Aziz Superintendent Agriculture Dept Peshawar
 890. Imtiaz Ahmad
 891. Tariq Mahmood
 892. Iftilhar Ahmad
 893. Wisal Muhammad
 894. Sayyar Ahmad
 895. Qabil Sald
 896. Nadir Khan
 897. Wilnyat Khan
 898. Hakim Khan

All are Assistants (624 to 867)

Signature
 10
 10


①

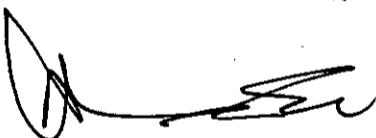
S.A #.1224/2023 titled "Muhammad Wajid Mehmood Vs. Police Department"

23rd Apr. 2024 **Kalim Arshad Khan, Chairman:** This case was fixed for yesterday, but due to non-availability of Bench, it could not be taken up. Today, learned counsel for the appellant put appearance. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

2. Learned counsel for the appellant stated that the grievances of the appellant have been redressed and has instructions from appellant to withdraw this appeal. As a token of admission of his submission, he signed the margin of order sheet. Dismissed as withdrawn. Consign.

3. *Pronounced in open Court at Abbottabad and given under our hands and seal of the Tribunal on this 23rd day of April, 2024.*


(Muhammad Akbar Khan)
Member (E)
Camp Court, Abbottabad


(Kalim Arshad Khan)
Chairman
Camp Court, Abbottabad

Mutazem Shah

SCANNED
KPST
Peshawar

MUHAMMAD
IRSAHIM 23.4.2024
I went to witness this case

2

27th Nov. 2023

1. Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Tanveer Ahmad, DSP (Legal) for the respondents present.

2. Reply on behalf of the respondents was not submitted. Request for adjournment was made on behalf of the respondents to submit reply/comments. Granted. To come up for reply/comments on 22.01.2024 before S.B at Camp Court, Abbottabad. P.P given to the parties.

(Kalim Arshad Khan)
Chairman
Camp Court, Abbottabad

*Mutaze Shah *

SCANNED
KPST
Peshawar

22.01.2024

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Shamraiz, S.I (Legal) for the respondents present.

2. Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Granted. To come up for reply/comments on 22.04.2024 before S.B at camp court Abbottabad. P.P given to the parties.

(Muhammad Akbar Khan)
Member (E)
Camp Court Abbottabad

kamranullah

SCANNED
KPST
Peshawar

26th Sept. 2023

1. Learned counsel for appellant present and heard.
2. Against clear directions of the august Supreme Court of Pakistan in 2022 SCMR page 439 titled "Province of Sindh & others Vs. Shahzad Hasnain Talpur", the District Police Officer, Abbottabad has not written his name under the impugned order nor is there any date put on the order reverting the appellant to time scale Constable, however, there is an OB number on 01.03.2023 put on the order, which is considered to be the date of passage of the impugned order, learned counsel for the appellant says that the appellant had filed departmental appeal against the said order on 28.03.2023 to the Regional Police Officer, Hazara Division and the RPO vide order dated 24.05.2023 filed/rejected the same, hence, this appeal. The appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security fees within 10 days. The respondents be summoned through TCS/LCS, the expenses of which be deposited by the appellant within three days. To come up for reply/comments on 27.11.2023 before S.B at Camp Court, Abbottabad. P.P given to the appellant.

SCANNED
KPST
Peshawar

*Mutazem Shah *





(Kalim Arshad Khan)
Chairman
Camp Court, Abbottabad

FORM OF ORDER SHEET (4)

Court of _____

Appeal No. 1224/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/05/2023	<p>The appeal of Mr. M.Wajid Mehmood received today by registered post through Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 20/6/23</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>
20.06.2023		<p>Clerk of counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy before Hon'ble Peshawar High Court, Abbottabad Bench. Adjourned. To come up for preliminary hearing on 26.09.2023 before S.B at camp court, Abbottabad. P.P given to the clerk of counsel for the appellant.</p> <p style="text-align: right;">  (Rashida Bano) Member (J) Camp Court, Abbottabad</p>

**SCANNED
KPST
Peshawar**

**SCANNED
KPST
Peshawar**

5

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

Wajid Mehmood
..... Appellant

Versus

Court of W.P. No
..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Advocate</u> <u>Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____		√
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfill

Name:- M. Arshad Khan Danish Asst

Signature:- [Signature]

Dated:- 24/5/23

Index of Appeal

(6)

**BEFORE THE CHAIRMAN KP SERVICE TRIBUNAL
PESHAWAR.**

SCANNED
KPST
Peshawar

Appeal no. 1224/2023

M. Wajid Mehmood LHC No.767, Police Station Bakot, Tehsil & District
Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

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3.	Copy of Departmental appeal	"B"	9
4.	Copy of rejection order	"C"	10
5.	Vakalat Nama	--	11

APPELLANT

Through Counsel:

Muhammad Arshad Khan Tanoli

Advocate Supreme Court of Pakistan

Office # 33 Jinnah Plaza Adjacent to

(MUHAMMAD ARSHAD KHAN TANOLI)

Advocate Supreme Court of Pakistan,
Abbottabad

Dated:- 26/5/2023

7

BEFORE THE CHAIRMAN KP SERVICE TRIBUNAL

PESHAWAR.

Appeal No-1224/2024

M. Wajid Mehmood LHC No.767, Police Station Bakot, Tehsil & District Abbottabad.

...APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

Diary No. *5648*

Dated *29-5-2023*

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home and Tribunal Affairs, Peshawar.
2. Provincial Police Office (IGP) Khyber Pakhtunkhwa, Peshawar.
3. Regional Police Office Hazara Region Abbottabad.
4. District Police Officer (DPO) Abbottabad.

...RESPONDENTS

SERVICE APPEAL

SERVICE APPEAL U/S 4 OF KP SERVICE TRIBUNAL ACT 1974 FOR DECLARATION TO THE EFFECT THAT RESPONDENT NO.4 IMPOSED PUNISHMENT OF REVERSION FROM HEAD CONSTABLE TO TIME SCALE CONSTABLE WITH IMMEDIATE EFFECT VIDE

Filed to day

M
29/05/23
Registrar

IMPUGNED ORDER DATED 01.03.2023 AND
SIMILARLY, DEPARTMENTAL APPEAL OF THE
APPELLANT AGAINST THE IMPUGNED ORDER
HAS BEEN REJECTED VIDE ORDER NO.10093/E
DATED 24.05.2023, WHICH IS PERVERSE,
DISCRIMINATORY, AGAINST THE LAW AND HAS
BEEN PASSED WITHOUT CONDUCTING
INQUIRY. HENCE THE IMPUGNED ORDER
01.03.2023 AND REJECTION ORDER DATED
24.05.2023 ARE LIABLE TO BE SET-ASIDE.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT
SERVICE APPEAL, IMPUGNED ORDER DATED
01.03.2023 AND 24.05.2023 MAY BE SET-ASIDE
AND RESPONDENTS MAY BE DIRECTED TO
RESTORE RANK OF HEAD CONSTABLE OF THE
APPELLANT WITH ALL SERVICE BACK
BENEFITS. ANY OTHER RELIEF WHICH THIS
HON'BLE TRIBUNAL DEEM APPROPRIATE IN
THE CIRCUMSTANCES OF THE CASE MAY
ALSO BE ALLOWED TO THE APPELLANT.

Respectfully Sheweth,

The facts forming the background of the instant service appeal are arrayed as under:

1. That, the appellant was serving as Head Constable and was posted at Muslimabad Check Post District Abbottabad and the appellant served the department with due diligence, devotion and dedication and left no stone unturned in the smooth functioning of the Department.
2. That when respondent No.4 visited Muslimabad barrier on 26.02.2023 at that vary time, appellant was eating food inside the Check Post cabin. The appellant met with respondent No.4 on the barrier but even then respondent No.4 reverted the appellant from rank of head constable to time scale constable with immediate effect vide impugned order dated 01.03.2023. **(Copy of impugned order is annexed as annexure "A")**
3. That feeling aggrieved the appellant filed a departmental Appeal against the impugned order to respondent No.3 on 28.03.23 and the said respondent rejected the appeal of appellant

vide order dated 24.05.2023. (Copy of Departmental appeal is annexed as Annexure "B") rejection order is attached as Annexure "C")

Hence, the service appeal is filed inter-alia on the following grounds:

GROUND:-

- a) That, the appellant was present at Muslimabad barrier on 26.02.2023 when respondent No.3 paid surprise visit. As stated above, the appellant was eating food in the cabin of Check Post. But even than due to the reason best known to the respondent No.4 was illegally shown absent from the check post which is against the fact.
- b) That respondents' department reverted the appellant to rank of head constable to time scale constable with immediate effect without issuing show cause notice, statement of allegation and conducted proper inquiry which is not maintainable in the eyes of law.
- c) That when law prescribed a thing which is to be done in a particular manner that must be

done in that manner and not otherwise. It is further submitted that before imposition of punishment whether minor or major, proper inquiry is sine qua non for awarding the punishment as mentioned above but no inquiry, show cause notice, statement of allegations was issued prior to imposition of punishment.

- d) That the punishment of reversion against the appellant is based on whims and wishes of the respondents. Therefore, impugned order are nullity in the eyes of law.
- e) That the appellant has served for a period of 16 years and illegally has been reverted from Head Constable to the constable. Besides, the punishment awarded to the appellant is against principle of natural justice, good governance, therefore the respondent No.4 awarded punishment to the appellant due to no fault on the part of the appellant.
- f) That the matter relates to the term and conditions of service. Thereafter, Hon'ble tribunal has jurisdiction to entertain the service appeal of the appellant under Article 212 of

the Constitution of Islamic Republic of Pakistan 1973.

- g) That the service appeal is well within the time of limitation.

PRAYER:

It is prayed therefore humbly prayed that on acceptance of the instant Service Appeal, impugned order dated 01.03.2023 and 24.05.2023 may be set-aside and respondents may be directed to restore rank of head constable of the appellant with all service back benefits. Any other relief which this Hon'ble Tribunal deem appropriate in the circumstances of the case may also be allowed to the appellant.

... APPELLANT

Through Counsel:

Dated:- 26/5 /2023

(MUHAMMAD ARSHAD KHAN TANOLI)
Advocate Supreme Court of Pakistan,
Abbottabad

VERIFICATION:-

Verified that the contents of the instant **Service Appeal** are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- 24/5 /2023

... APPELLANT

BEFORE THE CHAIRMAN KP SERVICE TRIBUNAL
PESHAWAR.

M - Wajid Mehmood LHC No.767, Police Station Bakot, Tehsil & District
Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa and others


...RESPONDENTS

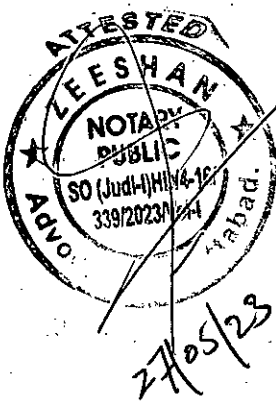
SERVICE APPEAL

AFFIDAVIT

I, Wajid Mehmood LHC No.767, Police Station Bakot, Tehsil & District
Abbottabad, Appellant, do hereby solemnly affirm and declare on Oath
that the contents of instant **Service Appeal** are true and correct to the best
of my knowledge and belief and that nothing has been concealed from this
Hon'ble Tribunal.

Dated:- 24/5 /2023


...APPELLANT





767 14
**OFFICE OF THE DISTRICT POLICE
OFFICER ABBOTTABAD**

Ph: No: 0992-9310026, Fx: No: 0992-9310025
atdpolice@gmail.com

col

ORDER

Annex-A
P-8

This office order will dispose-off summary proceedings against HC Wajid No. 767. On 26-02-2023 the undersigned paid surprised visit at Muslimabad Barrier, where he was found absent from official duty without prior permission of competent authority. He being responsible miserably failed to observe the nature of job and no official was present on the barrier as this is the main district entrance/ exit point. Several instruction/ directions were conveyed in this regard but no compliance was made. His this negligent act showed high degree of negligence, disobedience, slackness in performance of official duty and gross misconduct on his part under the E& D rules.

Therefore, in exercise of the powers vested in the undersigned under Police Disciplinary Rules-1975 (amended 2014) section 5 (2 & 5), I, Umar Tufail PSP, District Police Officer, Abbottabad, as a competent authority, am constrained to award him the punishment of Reversion from Head Constable to time scale constable with immediate effect.

Order announced.

**District Police Officer
Abbottabad**

CC:-

1. Pay Officer, DPO Office Abbottabad.
2. EC & OASI DPO Office.
3. OB Clerk for necessary action.

Attested

OB - NO - 59
01 - 3 - 23

M. Arshad Khan Tapani
Asst. Secy of Police
at ATD

M. Arshad Khan Tapani
Assistant Secretary
Office # 03 Jinnah Plaza Adjacent to
Dist. Office Abbottabad

Annex-73

No. 6653/E

29-3-23 DPo ATD

اردو ترجمان (پب) پی

جنرل ایف ڈی جی

A-9

HC سروس و رینک

For n/a 4
detailed comments
along with copy
of the file
DIG/2023
28/3

سیکریٹریٹ

7965

28/3/23

سیکریٹریٹ سروس و رینک

(1) سائل جناب سے زیر ساریہ لیٹور HC اپنی ڈیوٹی احسن طور پر پھرتے سرانجام دے رہے ہیں۔ ورنہ 26/2/23 کو میسری ڈیوٹی سٹاف انچارج مع نفری مسلم آباد جیک پوسٹ محلی۔ کمرات تقریباً 20/11/23 میں مع نفری دورہ کیا۔ موجودہ مہرگی میں کھانا کھا رہے تھے جناب DPo صاحب نے ملازم کوئی کیا جو ہم کوئی سرورج ڈیوٹی ملازمان دور بھی دور انچارج صاحب کو معطل کر دیا۔

(2) دور دور جن بعد مہرگی میسرے جوانوں دور انچارج صاحب کو معاف کر کے بحال کر دیا گیا اور بھی دور 21/3/23 - OB عیسری جناب DPo صاحب نے بین سزائیں ٹھکانہ دارا ایک ایگزیکٹو سٹاف (a) دلچسپوشن رینک دورہ نام سیکل کر دیا ہے۔

(3) جو کس میسرے ساتھ نا انصافی دور میں نے کر ڈرائی تقوالان کے دورہ 26/2/23 دفتر جناب DPo صاحب میں دیہہ خیر ساری درخواست سرزاری سے حکمرتا حال سے نقل واپسی بھی نہیں دی جا رہی۔

(4) میں دیہہ خیر ساری ماتحت ملازم ہوں۔ میسرے چھوٹے چھوٹے بیج جس میں میسرے حقوق و سوائے میسرے ساتھ انصاف نظر آیا جاوے۔ عیسری بحالی ٹیسٹ HC دور سروس و ایگزیکٹو سٹاف کی بحالی حکم صادر فرمایا جاوے۔

سائل - مہرگی اور 767/23 میسنر تھا نہ لوگ رینک کی بار -
FC
28.03-2023

Handwritten signature and stamp of the District Judge, District Court of Pakistan, District Abbottabad.



OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-22

📠 0992-9310023

✉ pohazara@gmail.com

NO: 10093 / E DATED 24/05/2023

Annex-c¹⁶

P-10

ORDER

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Constable Wajid Mehmood No. 767 of District Abbottabad against the punishment of " *reversion from Head Constable to time scale Constable*" awarded by District Police Officer Abbottabad vide OB No. 59, dated 01-03-2023.

Brief facts leading to the punishment are that the appellant while posted at Muslimabad Barrier, during surprise visit of DPO Abbottabad on 26-02-2023 he was found absent from official duty without obtaining prior permission from his senior miserably failed to observe the nature of job and no official was present on the barrier as this is the main District entrance and exit point.

After receiving his appeal, comments of District Police Officer, Abbottabad were sought and examined/perused. The undersigned called the appellant in OR on 23-05-2023 and heard him in person, where he has been given reasonable opportunity to defend himself against the charges, however he failed to advance any justification in his defense. Thus, the disciplinary action taken by the competent authority seems genuine and the appeal is liable to be dismissed. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 (amended 2014) the instant appeal is hereby *filed/rejected* with immediate effect.

TAHIR AYUB KHAN (PSP)
Regional Police Officer,
Hazara Region, Abbottabad.

Copy forwarded to DPO, Abbottabad for information and necessary action w/r to his office Memo: No. 2735/PI, dated 03-03-2023. Service record alongwith fauji missal containing enquiry file of the appellant is returned herewith for record.

M. Arif
Touche
24/5/23

کورٹ فیس
قیمتی

وکالت نامہ

SCANNED
KPST
Peshawar

Service Tribunal KPK Peshawar بعدالت

Govt of KPK etc نام: ^{Mohammad} Wajid عنوان:

Appellant منجانب:

Service Appeal نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی وجواب دہی کل کاروائی متعلقہ آس مقام

Abbottabad Muhammad Arshad Khan Tanoli - Asc

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب

موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصول چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول

ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

Abbottabad بمقام:

الرقوم: 26 سنی 2023

Muhammad Arshad Khan Tanoli
Advocate
Court of Pakistan
19-10-2019
District Bar, Abbottabad

Muhammad Arshad
Khan Tanoli - Asc of Pakistan
at Abbottabad

محمد ارشد خان تانولی
767 سنی 2023