
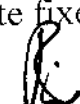


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** \_\_\_\_\_

**1905/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1.	10/10/2024	<p>The appeal of Mst. Kosar Bibi presented today by Syed Asif Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 11.10.2024. Counsel for Parcha Peshi given to the counsel for the appellant .</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>
11.10.2024	1.	<p>Learned counsel for the appellant present and heard.</p> <p>2. Let a pre-admission notice be issued to the respondents for submission of written reply. Respondents be summoned through TCS, the expenses of which shall be deposited by the petitioner within two days. To come up for written reply/preliminary hearing on 22.10.2024 before S.B. P.P given to the parties.</p> <p>3. Alongwith the appeal there an application for suspension of operation of the impugned order No. 4892-93/E-IV dated 06.06.2024. Notice of the application be issued to the respondents. In the meanwhile, operation of the impugned order is suspended till the date fixed.</p> <p> Rashida Bano Member (J)</p>

22.10.2024 1. Learned counsel for the appellant present. Mr. Arshad Azam, Assistant Advocate General alongwith Yaqoob Khan, DSP (L) and Muqraj Ahmad, Inspector for the official respondents present. Nobody present on behalf of respondent No. 4, hence she is placed and proceeded *ex-parte*.

2. Written reply not submitted. Representative of respondents sought time for submission of written reply. Granted. To come up for written reply/comments on 29.10.2024 before S.B at Camp Court, Abbottabad. P.P given to the parties.

3. Suspension of operation of impugned order dated 06.06.2024 is extended till the date fixed.

Rashida Bano  
Member (J)

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No 1905 of 2024

Kosar Bibi.....Appellant

**VERSUS**

The Inspector General of Police KPK  
Peshawar etc.....Respondents

**APPEAL**

**APPLICATION FOR URGENT HEARING OF SERVICE**

**APPEAL AT PRINCIPAL SET.**

**Respectfully shewith!**

- 1) That, the titled service appeal relates to transfer and being urgent in nature.
- 2) That, the appellant seek suspension of impugned transfer order and also seek direction to respondents to not take any adverse action.
- 3) That, if the instant service appeal is not hearing in urgent than appellant would be suffer irreparable loss.

**IT IS THEREFORE** humbly prayed that the titled service appeal may kindly be fixed on today for decision/order of status-quo application.

**Dated 10.10.2024**

  
Kosar Bibi  
(Appellant)

Through:-

  
**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

**CHECK LIST**

Case Title: KOSAR BIBI vs TG KPK

SN	CONTENTS	YES	NO
1	This Appeal has been presented by <u>SYED ASIF SHAH Advocate</u>		
2	Whether counsel / appellant/ respondent/ deponent have signed the requisite document?	✓	
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 pagged?	✓	
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 number 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?		X
18	Whether case relate to this Court?	✓	
19	Whether requisite number of spare copies are 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 /documentations as required in the above table, have been fulfilled.

Name: Syed Asif Shah Advocate

Signature: [Signature]

Dated: 10-10-24

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No 1905 of 2024  
Kosar Bibi.....Appellant

**VERSUS**

The Inspector General of Police KPK  
Peshawar etc.....Respondents

**APPEAL**  
**INDEX**

S#	Description of documents	Annexure	Page#
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3.	Application for Suspension of impugned order along with affidavit.		15-16
4.	Correct address of Parties		17
5.	Copy CNIC & Domicile.	A	18-20
6.	Copy of certificates.	B	21-26
7.	Copies of course certificate and letters.	C	27-36
8.	Copies of applications and medical records.	D	37-40
9.	Copy of impugned order dated 06.06.2024.	E	41-42
10.	Copy of application.	F	43-48
11.	Copy of explanation notice.	G	49
12.	Attested copies of WP No. 627-A of 2024 and order dated 24.06.2024.	H	50-59
13.	Attested copies of Department appeal and applications.	I	64-73
14.	Attested copies of CM No. 516-A and order dated 29.07.2024.	J	74-80
15.	Copy of letter dated 07.08.2024	K	81
16.	Attested copy of COC petition.	L	82-88
17.	Attested copies of writ petition No. 977-A of 2024.	M	89-95
18.	Wakalat Nama		96-96a

**Dated 10.10.2024**

Kosar Bibi  
(Appellant)

Through:-

**JUNAID ANWAR KHAN**  
**ADVOCATE SUPREME COURT**  
**OF PAKISTAN**

&  
**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**  
**At Mansehra**

1

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16619

Dated 11.10.2024

Service appeal No 1905 of 2024

Kosar Bibi Head constable BPS-9 Belt No. 647. of District  
Police Mansehra presently serving at Police Training School  
Mansehra..... **Appellant**

**VERSUS**

1. The, Inspector General of Police, Khyber  
Pakhtunkhawa, Peshawar.
2. The, Additional Inspector General of Police (AIG),  
Establishment Khyber Pakhtunkhwa, Peshawar.
3. The Director/Principal, Police Training School District  
Mansehra.
4. LFC Sidra Shabir BPS-7 Belt No. 1477, District Police  
Mansehra.

Filed to-day

Registrar

H/16/24

..... **Respondents**

2

APPEAL UNDER SECTION 4 OF KPK  
SERVICE TRIBUNAL ACT, 1974 AGAINST  
IMPUGNED TRANSFER ORDER BEARING NO.  
4892-93/E-IV DATED PESAHWAR  
06.06.2024 PASSED BY RESPONDENT 02  
WHEREBY THE APPELLANT TRANSFER  
FROM PTS MANSEHRA TO HIS PARENT  
DISTRICT POLICE MANSEHRA AND  
RESPONDENT NO. 04 ADJUST ON THE POST  
OF APPELLANT, SIMILARLY THE IMPUGNED  
ACTION/INACTION OF RESPONDENT NO. 01  
ON THE DEPARTMENTAL APPEAL OF  
APPELLANT DATED 03.07.2024 ARE  
WRONG, ILLEGAL, AGAINST THE LAW,  
RULES, REGULATION, WITH MALAFIDE  
INTENTION, DISCRIMINATORY, ARBITRARY,  
PERSONAL GRUDGE, PERVERSE,  
CAPRICIOUS AGAINST THE PRINCIPLE OF  
NATURAL JUSTICE AND ALSO AGAINST THE  
FUNDAMENTAL RIGHTS OF THE  
APPELLANT AND AGAINST THE REVERENT  
RULES/LAW HENCE LIABLE TO BE  
CANCELLED.

3

**PRAYER:-**

On acceptance of the instant service appeal, the impugned transfer order bearing No 4892-93/E-IV DATED Pesahwar 06.06.2024 passed by respondent 02 whereby appellant transfer from PTS Mansehra to parent District Police Mansehra and respondent No. 01 adjust on the post of appellant and impugned action/inaction of respondent No. 01 on which the departmental appeal is still not decided or not provided any opportunity of hearing, are declared wrong, malafide, victimization, illegal, against the law, arbitrary, discriminatory, perverse, capricious, result of personal grudge and also against the fundamental rights of the appellant hence liable to be cancelled, Respondents No. 01 to 03 be directed to restore the original position of appellant on the post in question with all back benefits.

**Respectfully shewith!**

**Facts**

1. That, the appellant is a bona fide resident of District Mansehra.

**(copy CNIC & Domicile annexed as annexure "A").**



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2. That, the appellant served the police department since 13.08.2014 and initially posted in District Police Mansehra.
3. That, in year 2018 the appellant transfer from District Police Mansehra to Police Training School Mansehra.
4. That, appellant performing her duty devotedly, punctuality and her performance being a law instructor up to the mark.
5. That, appellant is married and educated up to Masters degree during her service she performed the best of her ability and receive many appreciation/award by the competent authority.  
**(copy of certificates are annexed as annexure "B").**
6. That, appellant also qualified the lower course and passed the requisite training/course.  
**(copies of course certificate and letters are annexed as annexure "C").**
7. That, the appellant is well equipped in relevant field and having a good experience and reputation in Police

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tanning schools. The students of appellant obtaining the excellent marks in the relevant subject.

8. That, when appellant pregnant, the appellant visit the doctor concerned, the doctor advice the appellant to avail the maternity leave, the appellant applied to the official respondents for availing the maternity leave according to the relevant rules, law by submitting applications with medical records.

**(copies of applications and medical records are annexed as annexure "D").**

9. That, despite granting the maternity leave to the appellant, astonishingly transfer the appellant from PTS Mansehra to District Police Mansehra and adjust the respondent No. 04 in the place of the appellant vide impugned order bearing No. 49892-93/E-IV dated Peshawar 06.06.2024 and also verbally declined/non granting the maternity leave.

**(copy of impugned order dated 06.06.2024 annexed as annexure "E").**

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10. That, the adamant attitudes of the respondents the appellant submitted an application before the respondent No. 01 for her genuine grievances.

**(copy of application is annexed as annexure "F").**

11. That, after submission of an application respondents initiated inquiry against the appellant and also called the explanation.

**(copy of explanation notice are annexed as annexure "G").**

12. That, being aggrieved from the impugned action of respondents, appellant filed a writ petition bearing No. 627-A of 2024 before the Honourable Peshawar High Court bench Abbottabad, in which interim relief allowed vide order dated 24.06.2024 and also extended 02.07.2024.

**(Attested copies of WP No. 627-A of 2024 and order dated 24.06.2024 annexed as annexure "H").**

13. That, appellant also filed a Departmental appeal on dated 03.07.2024 before the respondent No. 01 and also filed applications before the worthy Chief secretary Home and tribal Affairs KPK

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Peshawar and worthy Secretary Home and Tribal Affairs KPK Peshawar.

**(Attested copies of Department appeal and applications are annexed as annexure "I").**

14. That, during the pendency of writ petition the respondents deliberately stopped the salary of the appellant, being aggrieved appellant filed an Civil miscellaneous petition bearing No. 516-A of 2024 for releasing the salary before the Honourable High court Bench Abbottabad, which was allowed vide order dated 29.07.2024 with direction to respondents that her salary be released and also be granted/extended the interim order for not taking any decision against the appellant till the next date of hearing in Writ petition.

**(Attested copies of CM No. 516-A and order dated 29.07.2024 are annexed as annexure "J").**

15. That, after the issuing direction by Peshawar High court Bench Abbottabad vide order dated 27.07.2024 the DPO concerned directed issue a letter No. 7233 dated 07.08.2024 to Director PTS

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Mansehra for implementation of court order, because the appellant not relinquish the charge and still the appellant serving under the Director PTs Mansehra.

**(Copy of letter dated 07.08.2024 annexed as annexure "K").**

16. That, when respondents not implemented the court order, appellant having no other adequate remedy filed a contempt of Court petition vide COC No. 82-A of 2024 on dated 05.09.2024.

**(Attested copy of COC petition annexed as annexure "L").**

17. That, main writ petition and COC petition still pending before the Honourable Peshawar High court and no date fixed for hearing.

18. That, appellant husband namely Ali Asghar also serving as FC No. 148 under the supervision of District police, after aforesaid applications, writ petition and COC the official respondents also harassed the husband of appellant and compel for withdrawing the cases/applications of appellant, due to

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illegal harassment the husband of appellant also filed a writ petition bearing No. 977-A of 2024 before the Peshawar High Court bench Abbottabad, which is still pending.

**(Attested copies of writ petition No. 977-A of 2024 annexed as annexure "N").**

19. That, appellant approach the Honourable Peshawar High court bench Abbottabad for discriminatory treatment, fundamental right. Appellant also filed the Departmental appeal on dated 03.07.2024, but respondent No. 01 till now not redress the grievances of appellant nor giving any opportunity of hearing. Appellant approach many time to the offices of respondent No. 01 but in vain no acceptance or rejection order copy obtained, due to lapse of statutory period instant service appeal is filed.
20. That, feeling aggrieved, appellant having no other remedy except to file the present service appeal on the following amongst other grounds.

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## GROUNDS:

- A. That, the impugned transfer order is wrong, illegal, against the law, rules, regulation, with malafide intention, discriminatory, arbitrary, perverse, personal grudges, capricious against the principle of Natural Justice and also against the fundamental rights of the appellant hence impugned transfer order liable to be cancelled/struck down.
- B. That, the impugned orders of official respondents are result of mala-fide, victimization, Harassment, personal grudge and discriminatory in nature hence liable to be withdrawn/cancelled.
- C. That, appellant performing her duty according to the law, rules and regulation and also perform her duty to great zeal and zest. Appellant having unblemished service record as well.
- D. That, the appellant having a good experience in PTS as instructor, well

(11)

trained and appellant performance acknowledged by her high-up's.

- E. That, it is well established principle **"right man for right job or the one who knows the skills required for job"** the respondent No.07 having no knowledge and experience regarding instructor/teaching hence appellant is entitled to be hold the post in question.
- F. That, before issuing impugned order no notice was served by the appellant nor given any chance of hearing, hence the impugned order against the principle of Natural Justice and appellant was unheard by the official respondents.
- G. That, it is well established law during the pendency of application for grant of maternity leave the appellant cannot be transferred nor any adverse action taken against her.
- H. That, act of the respondents are also against the norms of justice, equity and fair play.



- I. That, the powers or jurisdiction are vested in an authority to exercise it justly, fairly, honestly, judiciously and in accordance with the mandate of law, rules and regulations but the respondents have transgressed upon their powers while not adjusted/posted the appellant to her original post.
- J. That, it is an inalienable right to enjoy the protection of law and to be treated in accordance with law, rules and regulations but this right of the appellant has been infringed by the respondents in a sheer malafide manner.


**PRAYER:-**

On acceptance of the instant service appeal, the impugned transfer order bearing No 4892-93/E-IV DATED Pesahwar 06.06.2024 passed by respondent 02 whereby appellant transfer from PTS Mansehra to parent District Police Mansehra and respondent No. 04 adjust on the post of appellant and impugned action/inaction of respondent No. 01 on which the departmental appeal is still not decided or not provided any opportunity of hearing, are declared wrong, malafide, victimization, illegal,


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against the law, arbitrary, discriminatory, perverse, capricious, result of personal grudge and also against the fundamental rights of the appellant hence liable to be cancelled, Respondents No. 01 to 03 be directed to restore the original position of appellant on the post in question with all back benefits.

**Dated 10.10.2024**

  
Kosar Bibi  
(Appellant)

Through:-

  
**JUNAID ANWAR KHAN**  
**ADVOCATE SUPREME COURT**  
**OF PAKISTAN**

  
**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**  
**At Mansehra**

**VERIFICATION:**

I, Kosar Bibi Head constable Belt No. 647 of District Police Mansehra presently serving at Police Training School Mansehra, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

  
**KOSAR BIBI**

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**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Kosar Bibi.....Appellant

**VERSUS**

The Inspector General of Police KPK  
Peshawar etc.....Respondents

**APPEAL**

**AFFIDAVIT**

I, KOSAR BIBI HEAD CONSTABLE BELT NO. 647 OF DISTRICT POLICE MANSEHRA PRESENTLY SERVING AT POLICE TRAINING SCHOOL MANSEHRA, DO HERBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT THE NO SUCH SUBJECT MATTER APPEAL HAS EVER BEEN FILED BEFORE THIS HONORABLE COURT NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Dated: 10.10.2024

  
**KOSAR BIBI  
DEPONENT**

**ATTESTED**  
**Muhammad Adil**  
**OATH Commissioner**  
**Advocate Mansehra**  
10-10-24

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**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2024  
Kosar Bibi.....Appellant

**VERSUS**

The Inspector General of Police KPK  
Peshawar etc.....Respondents

**APPEAL**

**APPLICATION FOR SUSPENSION OF OPERATION OF**  
**THE IMPUGNED ORDER BEARING NO. 4892-93/E-IV**  
**DATED PESHAWAR 06.06.2024 AND RESPONDENTS**  
**ALSO BE RESTRAINED FROM TAKING ANY ADVERSE**  
**ACTION AGAINST THE APPELLANT TILL THE**  
**DECISION OF INSTANT SERVICE APPEAL.**

**Respectfully shewith!**

- 1) That, the above titled service appeal is being filed in this Honourable tribunal, the instant application may please be consider as part and parcel of instant service appeal.
- 2) That, appellant has got good prama fice case and is hopeful in her success.
- 3) That, balance of Convenience also lie in favour of appellant.
- 4) That, if the impugned order is not suspended then appellant would suffer irreparable loss because appellant still serving under the respondent No. 03 in PTS Mansehra and did not

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relinquish her charge, but respondents forced the appellant to do so.


**IT IS THEREFORE**, prayed that the operation of impugned order bearing No. 4892-93/E-IV dated Peshawar 06.06.2024 may please be suspended till the final disposal of instant service appeal, further prayed official respondents be restrained from taking any adverse action against the appellant and forcing the appellant to relinquish her charge.

**Dated 10.10.2024**

  
Kosar Bibi  
(Appellant)

Through:-

  
**JUNAID ANWAR KHAN**  
ADVOCATE SUPREME COURT  
OF PAKISTAN

&  
  
**SYED ASIF SHAH**  
ADVOCATE HIGH COURT  
At Mansehra

**AFFIDAVIT !**

I Kosar Bibi Head constable Belt No. 647 of District Police Mansehra presently serving at Police Training School Mansehra, do hereby solemnly affirm and declare that the contents of fore-going application are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable court.

  
Deponent  
**KOSAR BIBI**

**ATTESTED**  
Muhammad Adil  
OATH Commissioner  
Advocate Mansehra

**ATTESTED**  
Muhammad Adil  
OATH Commissioner  
Advocate Mansehra

10-10-24

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**BEFORE THE SERVICE TRIBUNAL**

**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2024  
Kosar Bibi.....**Appellant**

**VERSUS**

The Inspector General of Police KPK  
Peshawar etc.....**Respondents**

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

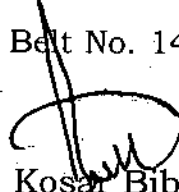
**APPELLANT:**

Kosar Bibi Head constable Belt No. 647 of  
District Police Mansehra presently serving at  
Police Training School Mansehra.


**RESPONDENTS:**

- (1) The, Inspector General of Police, Khyber  
Pakhtunkhwa, Peshawar.
- (2) The, Additional Inspector General of Police  
(AIG), Establishment Khyber Pakhtunkhwa,  
Peshawar.
- (3) The, DIG, Training, Khyber Pakhtunkhwa,  
Peshawar.
- (4) The, Director/Principle, Police Training School,  
Mansehra.
- (5) The, District Police Officer Mansehra
- (6) Pay officer Senior Clerk Police Training School  
Mansehra.
- (7) The Service Record Clerk, Police Training  
School, Mansehra.
- (8) LFC Sidra Shabir BPS-7 Belt No. 1477, District  
Police Mansehra.

**Dated 10.10.2024**

  
Kosar Bibi  
(Appellant)

Through:-

  
**JUNAID ANWAR KHAN**  
**ADVOCATE SUPREME COURT**  
**OF PAKISTAN**

&

  
**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**  
**At Mansehra**



PAKISTAN  
ISLAMIC REPUBLIC OF PAKISTAN

Anam A. (18)

Name  
KOUSAR



Married Name  
Ali Aksar



Gender  
F

Country of Stay  
Pakistan

Identity Number  
13503-6661861-0

Date of Birth  
09.04.1993

Date of Issue  
18.04.2022

Date of Expiry  
18.04.2032

Holder's Signature

سٹیبلنگ: 13503-6661861-0  
کوسار علی اکسر، فیصلہ دہندہ

13503-6661861-0



سٹیبلنگ: 13503-6661861-0  
کوسار علی اکسر، فیصلہ دہندہ

101221541623

محمد شمس الدین  
Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی ایئر بس میں ڈال دیں

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Anex A 19

# DOMICILE CERTIFICATE KHYBER PAKHTOONKHWA DISTRICT MANSEHRA



I declare that I am born of parents who are/were permanently domiciled in  
KHYBER PAKHTOONKHWA PROVINCE having been born/soiled in this province.

I was born at Village/Mohallah: PATTIAN

Tehsil HAJIB ZIRA District HAJIB ZIRA Hazara Division.

*KOUSAL*  
Signature of Applicant

Date: 03-11-2011

Purportance to the Declaration date: 03-11-2011

Filled by Mr./Miss/Mrs: KOUSAL

S/O of Mr. MULHAMAD HANIF

Domiciled in Khyber Pakhtoonkhwa Province, it is here by certified that the said:  
APPLICANT is born of parents who are/were permanent residents of the

Khyber Pakhtoonkhwa Province, having been born/soiled within

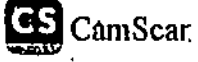
I have satisfied myself from personal /my knowledge verification

declaration is true and certify accordingly.

This 3rd Day of November 2011

12035  
*M. Hanif*  
Counter signed  
DISTRICT OFFICER  
REVENUE & ESTATE  
*Attested  
A.T.C.*

*Attested*  
DEPUTY DISTRICT OFFICER  
REVENUE & ESTATE





Handwritten notes and a diagram showing a horizontal line with a vertical line extending downwards from its center, and some scribbled lines above.

Handwritten notes including a circled 'E' and some illegible scribbles.

Handwritten text in Urdu script, consisting of several lines of cursive writing.

Handwritten notes and a signature, possibly 'R. M. J.', written in Urdu script.

Handwritten text in Urdu script, appearing to be a list or a series of connected notes.

Handwritten text in Urdu script, possibly a date or a specific reference.

Handwritten text in Urdu script, including a fraction  $\frac{p}{10}$  and several lines of cursive writing.

Anex B (21)



Reg: No. 1765 /PSIT

Position in Class. \_\_\_\_\_

# CERTIFICATE

This is to certify that

Mr/MS Kosar Bibi No.647 (Lady Constable) District/ Unit Manshera

has participated and successfully completed

## Basic IT Skills Training

held at Police School of Information Technology, Peshawar

From 06.03.2017 to 17.03.2017

Deputy Inspector General of Police,  
Training, Khyber Pakhtunkhwa,  
Peshawar

Paul Norman  
International Policing Specialist  
UNDP, Peshawar

Director  
Police School of  
Information Technology, Peshawar

*Attested:  
A.T.C.*

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# POLICE TRAINING SCHOOL MANSEHRA



Commendation Certificate III  
is awarded to

Lady HC KOSOR

In recognition of

His Good Performance  
during visit of D/S Head.

OB No 20

Dated 10-03-2020

  
District Police Officer  
Mansehra

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# Certificate of Participation

Mr./Ms. KAUSAR (L.H.C)


Participated in

One Day Police Sensitization Workshop

held on 10<sup>th</sup> - Dec. 2018

at Police Training School Mansehra

  
Representative  
SHARP-Pakistan

  
Representative  
UNHCR Sub Office Peshawar



24  
27  
**Pakistan Red Crescent Society**  
Khyber Pakhtunkhwa Branch



**ICRC**

# Certificate

This certificate is awarded to

**Ms Kosar**

For Participating in

4 Days Advance First Aid Training to Police Instructors KP Police.

He attended the 20 Hrs Course  
on 30<sup>th</sup> September to 3<sup>rd</sup> October, 2019

LEARN FIRST AID SAVE LIFE

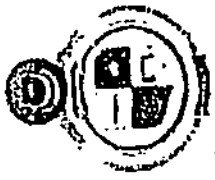
Dated: 5<sup>th</sup> October, 2019

S. No. PRC/ 126 /19

  
FIRST AID OFFICER

25

# POLICE TRAINING SCHOOL MANSEHRA



Rs. 1000/-

Commendation Certificate III  
is awarded to

W. V. KOSOVIC

In recognition of

Good performance during training activities.

Director  
Police Training School  
Mansehra

OB No Sa(i)

Dated 28-07-71

26

519



SHARP



UNHCR

# Certificate of Participation

Mr./Ms.

KAUSAR

Participated in

One day Police Sensitization Workshop

held on 14<sup>th</sup> Dec 2019

at Police Training School, Rawalpindi

Representative  
SHARP-Pakistan

Representative  
UNHCR Sub Office Peshawar

Dated: 22-01-2016  
Order Book No: 89

Dy: Commandant  
Police Training College Hangu

*[Handwritten Signature]*

*Attended*

GOOD TURN-OUT IN GENERAL PARADE

in recognition of

KAUSAR NO: 4619 MARYAM COY

is awarded to

Commendation Certificate III

1935



POLICE TRAINING COLLEGE HANGU



*Handwritten text at the bottom, possibly a name or date.*



28

# POLICE TRAINING COLLEGE HANGU



1935

Commendation Certificate III

is awarded to

QUSAR NO. 4619

AND REWARDED HER WITH CASH REWARD OF RS. 200/-  
in recognition of

HER GOOD PERFORMANCE DURING HASA KASHI MATU

Dated: 20-03-2015  
Order Book No.

Dy: Commandant  
Police Training College Hangu

Commandant  
Police Training College Hangu

Dated: 05-03-2016  
Order Book No. 202

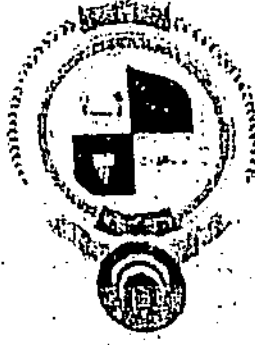
in recognition of  
CADER/FIRST POSITION HOLDER IN RECRUIT  
COURSE TERM ENDING 20.05.2015  
AT PTC HANGU

IGOWSAR NO.4619 OF MANSERHA

is awarded to

Commendation Certificate II

1935



HANGU

COLLEGE

TRAINING

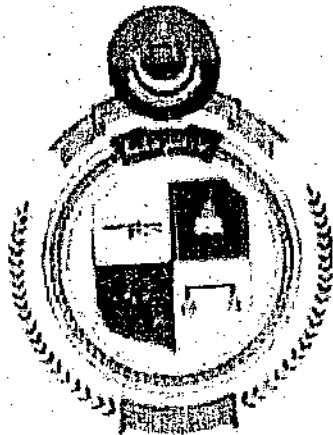
POLICE



D. ~~Amal~~

30

**POLICE TRAINING COLLEGE HANGU**




1935

Commendation Certificate III  
is awarded to  
**KOUSAR LOWER COURSE**  
in recognition of

**GOOD TURN OUT IN GENRAL PARADE**

15-1-2018

Dated:  
Order Book No. 27

  
Dy: Commandant  
Police Training College Hangu

31

POLICE TRAINING COLLEGE HANGU



Commendation Certificate II

is awarded to

KOWSAR NO.4619 OF MANSEHRA

in recognition of

CADET/FIRST POSITION HOLDER IN RECRUIT  
COURSE TERM ENDING 20.06.2015  
AT PTC HANGU

Dated: C  
Order Bc

Dated: 05-03-2016  
Order Book No. 202

*[Signature]*  
Commandant  
Police Training College Hangu

32

Ph. # 0925-621000  
Fax # 0925-621236



Office of the Commandant, Police Training College, Hangu.

2550  
10-376

To: The District Police Officer, Munsheera  
No: 350-678 dated 04.03.2016  
Subject: CADET/FIRST POSITION HOLDER IN RECRUIT COURSE TERM  
ENDING 20.06.2015 AT PTC HANGU.

Memo:

Please refer to this office Notification Endst: No.350-678 dated 04.03.2016

Based on written Test conducted by ETEA and Physical Examination by EPTC Nowshera under the chairmanship of DIGP Training CPO Peshawar for the declaration of First Position Holder in the subject recruit course. Term Ending 20.06.2015 Lady Recruit Kowsar Belt No 4619 of District Munsheera is hereby declared as Cadet/First position holder from PTC Hangu and her commendation Certificate is sent herewith for placing in her service record.

The above lady constable is hereby recommended for accelerated promotion and stipulated courses as provided in the police rules 13-5 (A), please.

*Muhammad Ashraf Noor*  
Muhammad Ashraf Noor, PSP  
Commandant,

- Not ...../S dated even.  
Copy for information to:
1. The W/ Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
  2. The Addl: IGP HQrs CPO, Peshawar.
  3. The DIG Training CPO, Peshawar.
  4. The DIG HQrs CPO, Peshawar.
  5. The AIG: Estab: CPO Peshawar.
  6. The AIG: (Legal) CPO Peshawar.

NE 5046  
Retained Forwarded to  
LPFPD Hozona Akbar  
The S. Roll of official  
may be sent to the  
for further n/a. The appn  
may also be directed  
to submit his annual in  
this office.

*SRe/Offr*  
*For Fuzin 7/9*

Muhammad Ashraf Noor, PSP  
Commandant,

*Muhammad*  
*10/07/16*  
*11/07/16*

*PRIMA*

33



Ph : 0925-621886  
Fax : 0925-620886

Office of the Commandant, Police Training College, Hangu.

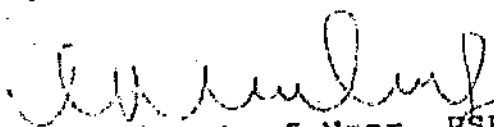
1935

ORDER

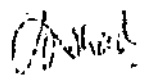
Based on written Test Conducted by FTEA and Physical Examination by BPTC Nowshera under the chairmanship of DDCP Training CPO Peshawar for the declaration of first position holder in recruit course, term ending 20/06/2015 Lady recruit Kowsar Behl No 4619 of District Manschna is hereby declared as Cadet First Position holder from PTC Hangu.

OB No. 202

Date: 02/06/2016

  
Muhammad Ashraf Noor, PSP

Commandant,



34  
Better copy

OFFICE OF THE COMMANDANT, POLICE TRAINING COLLEGE, HANGU,

ORDER

Based on written test conducted by ETEA and Physical Examination by EPTC Nowshera under the chairmanship of DIGP training CPO Peshawar for the declaration of first possession holder in recruit course. Term ending 20.06.2015 lady recruit Kowsar Belt No. 4619 of District Mansehra is hereby declared as Cadet First position holder from PTC Hangu.

OB No. 202

Dated: 03.03.2016

Muhammad Ashraf Noor, PSP

Commandant,

35



POLICE TRAINING COLLEGE  
HANGU - KHYBER PAKHTUNKHWA

# Certificate of Completion

## Search Techniques

This is to certify that

*Mrs. Kousar Ali*

has completed the above learning program

Police Training College Hangu

At Date: 22.05.015 To 25.05.015

Commandant





36

10' SA

# Pakhtunkhwa Police



## Khyber Pakhtunkhwa

### Commendation Certificate

CLASS II  
Granted by

Inspector General of Police, Khyber Pakhtunkhwa

LADY SO KOSAR NO. 4610

TO

Son of

District

AND RANGH

in Recognition of  
FOR GOOD PERFORMANCE OF OFFICIAL DUTY WITH CASE REWARD RS. 1000/-

*[Signature]*

ASST: Inspector General of Police

Dated: 20/03/2016

Attendant

Handwritten notes in Urdu script, possibly a list or record.

97/05  
97/05/24

Handwritten notes in Urdu script, including a signature.

Handwritten notes in Urdu script.

Handwritten notes in Urdu script.

Handwritten notes in Urdu script, including a date 97/06/24.

Handwritten notes in Urdu script, including the word 'KATH'.

Handwritten notes in Urdu script.

Amend (37) (37)

DMS-Admin/2024  
KATH MANSEHRA

8/7/2024  
expected date.

Form No. \_\_\_\_\_  
Date \_\_\_\_\_  
Gender \_\_\_\_\_  
Age \_\_\_\_\_  
Height \_\_\_\_\_  
Weight \_\_\_\_\_  
Blood Pressure \_\_\_\_\_  
Temp \_\_\_\_\_  
Pulse \_\_\_\_\_  
Respiration \_\_\_\_\_  
Oxygen Sat \_\_\_\_\_  
Hemoglobin \_\_\_\_\_  
Hematocrit \_\_\_\_\_  
Hemoglobin A1c \_\_\_\_\_  
Fasting Glucose \_\_\_\_\_  
Random Glucose \_\_\_\_\_  
Urea Nitrogen \_\_\_\_\_  
Creatinine \_\_\_\_\_  
Total Cholesterol \_\_\_\_\_  
Triglycerides \_\_\_\_\_  
HDL Cholesterol \_\_\_\_\_  
LDL Cholesterol \_\_\_\_\_  
VLDL Cholesterol \_\_\_\_\_  
Apolipoprotein B \_\_\_\_\_  
Apolipoprotein A \_\_\_\_\_  
Lipoprotein (a) \_\_\_\_\_  
Fibrinogen \_\_\_\_\_  
C-reactive Protein \_\_\_\_\_  
Interleukin-6 \_\_\_\_\_  
Tumor Necrosis Factor- $\alpha$  \_\_\_\_\_  
Homocysteine \_\_\_\_\_  
Uric Acid \_\_\_\_\_  
Phosphate \_\_\_\_\_  
Magnesium \_\_\_\_\_  
Calcium \_\_\_\_\_  
Sodium \_\_\_\_\_  
Potassium \_\_\_\_\_  
Chloride \_\_\_\_\_  
Bicarbonate \_\_\_\_\_  
Anion Gap \_\_\_\_\_  
Oxygen Saturation \_\_\_\_\_  
pH \_\_\_\_\_  
Partial Pressure of CO<sub>2</sub> \_\_\_\_\_  
Partial Pressure of O<sub>2</sub> \_\_\_\_\_  
Arterial Blood Gas \_\_\_\_\_

Handwritten signature or initials

Handwritten notes:  
This is to certify that  
Mrs. Genet Kosarwalo A/c. Asghar  
is working as HC/LI in PIS  
Mansehra. Her expected date of  
leaving is 01/11/2024. She is  
currently leaving to attend to  
her personal matters.

Handwritten notes in a separate box

Rx

Investigation

Form No. \_\_\_\_\_  
Date \_\_\_\_\_  
Gender \_\_\_\_\_  
Age \_\_\_\_\_  
Height \_\_\_\_\_  
Weight \_\_\_\_\_  
Blood Pressure \_\_\_\_\_  
Temp \_\_\_\_\_  
Pulse \_\_\_\_\_  
Respiration \_\_\_\_\_  
Oxygen Sat \_\_\_\_\_  
Hemoglobin \_\_\_\_\_  
Hematocrit \_\_\_\_\_  
Hemoglobin A1c \_\_\_\_\_  
Fasting Glucose \_\_\_\_\_  
Random Glucose \_\_\_\_\_  
Urea Nitrogen \_\_\_\_\_  
Creatinine \_\_\_\_\_  
Total Cholesterol \_\_\_\_\_  
Triglycerides \_\_\_\_\_  
HDL Cholesterol \_\_\_\_\_  
LDL Cholesterol \_\_\_\_\_  
VLDL Cholesterol \_\_\_\_\_  
Apolipoprotein B \_\_\_\_\_  
Apolipoprotein A \_\_\_\_\_  
Lipoprotein (a) \_\_\_\_\_  
Fibrinogen \_\_\_\_\_  
C-reactive Protein \_\_\_\_\_  
Interleukin-6 \_\_\_\_\_  
Tumor Necrosis Factor- $\alpha$  \_\_\_\_\_  
Homocysteine \_\_\_\_\_  
Uric Acid \_\_\_\_\_  
Phosphate \_\_\_\_\_  
Magnesium \_\_\_\_\_  
Calcium \_\_\_\_\_  
Sodium \_\_\_\_\_  
Potassium \_\_\_\_\_  
Chloride \_\_\_\_\_  
Bicarbonate \_\_\_\_\_  
Anion Gap \_\_\_\_\_  
Oxygen Saturation \_\_\_\_\_  
pH \_\_\_\_\_  
Partial Pressure of CO<sub>2</sub> \_\_\_\_\_  
Partial Pressure of O<sub>2</sub> \_\_\_\_\_  
Arterial Blood Gas \_\_\_\_\_

KATH MANSEHRA  
DISTRICT HEAD QUARTER HOSPITAL MANSEHRA  
Ph#: 0997-920096, Fax#: 0997-540211  
OPD Prescription Form  
REGULAR

Handwritten numbers in circles: 38 and 39

39

**KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

**RADIOLOGY DEPARTMENT**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmanshra@gmail.com

Website: [www.kathmanshra.com](http://www.kathmanshra.com)

**(Obstetric Ultrasound)**

67

Name Khosla Age \_\_\_\_\_ Date 27/5

Gravid Uterus having S.A.F.  
 Fetal movements +uc  
 Lie 4/cephalic  
 Presentation Anterior  
 Liquor Adequate  
 Placenta Anterior  
 B.P.D 8.2cm  
 Femur Length 6.1cm  
 Abdominal Circumference \_\_\_\_\_  
 Head Circumference \_\_\_\_\_  
 Gestational Age 30 weeks  
 E.D.D 21/6/11 + week



Sonologist/ Radiologist

(48) (40)

For maternity leave



**KING ABDULLAH TEACHING HOSPITAL MANSEHRA**  
**RADIOLOGY DEPARTMENT**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmanshra@gmail.com  
Website: www.kathmanshra.com


(Obstetric Ultrasound)

Name Koran Age \_\_\_\_\_ Date 27/5

Gravid Uterus having SAP  
Fetal movements inc.  
Lie Uterophalic  
Presentation Adequate  
Liquor Anterior  
Placenta 3-acm  
B.P.D 6-cm  
Femur Length \_\_\_\_\_  
Abdominal Circumference \_\_\_\_\_  
Head Circumference \_\_\_\_\_  
Gestational Age 32<sup>1</sup>/<sub>2</sub>



E.D.D 21-24 + week

  
27/5  
Sonologist/ Radiologist

<sup>E</sup>  
Annex (41)



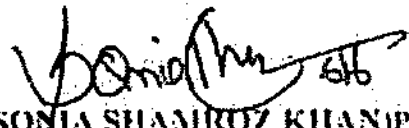
OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE, PESHAWAR  
Gmail: - [E4brmucpcpo@gmail.com](mailto:E4brmucpcpo@gmail.com)

No. 4892 - 93/E-IV dated Peshawar the 06/06/2024

ORDER

TRANSFER/POSTING:- LFC Sidra Shabir Belt No. 1477 of District Police Manshara is hereby transferred and posted to PTS Manshara with immediate effect.

REPATRIATION:- Head Constable Kosar Bibi Belt No. 647 of District Police Manshara presently serving in PTS Manshara is hereby repatriated to her parent District Police Manshara as substitute of the above named HC with immediate effect.

  
(SONIA SHAMROZ KHAN) PSP  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

ENDST: NO. & DATED EVEN:-

Copy of above is forwarded to the:-

1. Regional Police Officer, Hazara Region, Abbottabad.
2. SP/Training Khyber Pakhtunkhwa, Peshawar with reference to his office letter No. 2495/EC/Trg dated 27.05.2024.

Attested  
A.T.C.  


Anou E' (42)

(Better Copy)

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE, PESHAWAR

Gmail:- [E4branchcpo@gmail.com](mailto:E4branchcpo@gmail.com)

No.4892-93/E-IV dated Peshawar the 06/06/2024

**ORDER**

**TRANSFER/POSTING:-** LFC Sidra Shabir Belt No. 1477 of District Police Mansehra in Hereby transferred and posted to PTS Mansehra With immediate effect.

**REPATRIATION:-** Head Constable Kosar Bibi Belt No. 647 of District Police Mansehra Presently serving in PTS Mansehra is hereby repatriated to her parent District Police Mansehra as substitute of the above named HC with immediate effect.

(SONIA SHAMROZ KHAN) PSP

AIG/Establishment

For Inspector General of Police.

Khyber Pakhtunkhwa. Peshawar

**ENDST: NO.& Dated EVEN:-**

Copy of above is forwarded to the:-

1. Regional police Officer, Hazara Region, Abbottabad.
2. SP/Training Khyber pakhtunkhwa. Peshawar with reference to his office letter NO.2495/EC/Trg dated 27.05.2024.

بخدمت جناب اسپیکر جنرل آف پولیس محترم محترم اور

جناب عالی

گزارش ایک سالہ IPTS انسپرو میں بطور لاء انسٹرکٹر تعینات ہے اور اپنی ذمہ داری اہل حق طریقے سے انجام دیتی ہے سالہ پر پچھلے تین مہینوں سے ظلم و ستم کے پہاڑ توڑے جا رہے ہیں جسکے اٹالے کے لیے سالہ نے ڈی آئی بی ٹریڈنگ صاحب کو ایک درخواست ارسال کی جس پر ڈائریکٹر انٹیلیجنس سکول آف ایبٹ آباد کو انکوٹری مارک ہوئی سالہ کو مورخہ 25/05/2024 کو انکوٹری میں طلب کر کے انکوٹری آفیسر راضی نامہ کے لیے پریشر ڈالتا رہا اور RI پولیس انٹیلیجنس سکول آف ایبٹ آباد اپنے ساتھ ساتھ 3/4 سول کپڑوں میں بلوس پرائیویٹ اشخاص بٹھا کر سالہ پر راضی نامہ کے لیے پریشر ڈالتا رہا اور جرح کے دوران خود ہی سوال اور خود ہی جواب تحریر کرتا رہا اس وجہ سے سالہ نے انکوٹری آفیسر تبدیل کرنے کے لیے DIG صاحب ٹریڈنگ کو درخواست بذریعہ ڈاک ارسال کی کاپی ہمراہ لف ہے

اس درخواست دینے کی وجہ سے JCLI اہل شاہ اور SRC مجید نے تحصیل میٹرنیک ٹیچ ٹیچ کے بیٹے حسن شیخ کے کوہا کر اس سے سفارش کروا کر ڈائریکٹر اکرام اللہ psp سے سالہ کے خلاف انتہائی کاروائیوں کا آغاز کر دیا سالہ نے بوجہ بیماری میڈیکل ریٹ لیا تھا اس کی اور ٹیکیشن MS صاحب KATH انسپرو کو لیز تحریر کر کے ڈیر ٹیکیشن کروائی جو کہ میڈیکل درست ثابت ہوئے 3/3 دن کے میڈیکل کی ڈیر ٹیکیشن سالہ کو بھرانے اور ایک سٹاف ممبر کو ہٹ سک دیا کہ میڈیکل کالنگوا کر ادا کہ ملا ہیں اس نے MS آفس کے ملے سے جوڑ توڑ کرنے بہت کوشش کی پر MS آفس کے ملے کی ایمانداری کی وجہ سے کامیاب نہ ہو سکا کاپی ہمراہ لف ہے

ڈی آئی بی صاحب کو درخواست دینے پر سالہ کو اس معاملے پر شوکار نوٹس جاری کیا جبکہ سالہ نے مکمل جواب جمع کروایا ہمراہ لف ہے

سالہ کی ٹرانسفر ضلع واہسی کے لیے لیز لکھوایا جسکا ذکر سالہ نے ڈی آئی بی صاحب ٹریڈنگ صاحب کو دی جانے والی درخواست میں سالہ نے واضح لکھا تھا کہ سالہ کی اپنے حق کی آواز اٹھانے کی وجہ سے ٹرانسفر کروائیں گے جس کی کاپی ہمراہ لف ہے تحصیل میٹرنیک ٹیچ شیخ کے بیٹے سے سفارش کر کے انتہائی کاروائی کرانی گئی تحصیل میٹرنیک کے بیٹے کو ایک سرٹیفکیٹ جاری کیا اور ڈائریکٹر صاحب کے ہمراہ پتھر بھی لکھوائی ہمراہ لف ہے

سالہ اب حالت حاملہ میں ہے سالہ نے مورخہ 2023/05/27 کو KATH انسپرو سے میڈیکل چیک اپ کروا کر ڈاکٹر صاحب نے مورخہ 2023/06/07 سے میٹرنیٹی لیو تجویز کی جو میں نے اپنے روزنامہ میں واہسی کر کے درخواست لکھ ساتھ اور پچھلے میڈیکل رپورٹ الٹرا سائڈ ہمراہ لف کر کے ڈائریکٹر صاحب کو خود پیش ہو کر ریکورڈ کی تو جناب ڈائریکٹر صاحب نے کہا میں آپ کو ضلع واہسی کروں گا دھر سے جا کر جنسی مرضی ہے میٹرنیٹی لیو لینا آپ لوگوں گاہے پیدا کرنے کے علاوہ اور کوئی کام نہ ہے یہ بات کہہ کر سالہ کو حراساں کر کے اختیارات کا ناجائز استعمال کیا کاپی ہمراہ لف ہے

Attested  
A.T.C.



اور اس سے قبل لیڈی بیڈ کنسٹریبل سید ذوی زاہد بلی مسز آف سید مظہر حسین شاہ کو اسی ڈائریکٹر اکرام اللہ صاحب نے پانچویں دفعہ 90 دن میٹرنٹی لیوڈی اس لیوڈی کے بعد مزید 15 دن چھٹی ویں اسکے طلوع واہسی کے لیے لیوڈیوں میں لکھا لیڈی LHC بعد یہ سوالی مرمہ 8 سال سے پائی ایس میں تعینات ہو کر دو دفعہ میٹرنٹی لیوڈی حاصل کی ہے اسکے طلوع واہسی کے لیے لیوڈیوں میں لکھا سالہ کے ساتھ موٹیلی ماں جیسا سلوک کیوں کیا جب رہا ہے PTS انہرو میں سٹاف میں ایسے لوگ تعینات ہیں جن کے 15/10 سال ہو گئے ہیں جن میں لیاقت پے آفیسر سینئر کلرک سلیم ASI عمران خان Insp نذر خان ASI اجہ HC وحید خان ASI احمد بیڈ کلرک عرف کالا پور خورد شہ زب۔ HC شیر زاہد ASI ارشد / SI LO محمد علی ASI سکین ASI معطلی HC امجد کوہستانی جو غیر کلرک شیر افضل HC فیاض HC احمد شیر FC نزاکت خان ASI پرویز CDI امر HC۔ غلام عباس FCI۔ جان محمد ASI تیمور HC قاضی واجہ HC اٹمن HC عثمان HC محمود امر HC سلطان SI اور ASI کے علاوہ مزید بھی ایسے لوگ موجود ہیں 8/7 سال ہو گئے ہیں انکا طلوع واہسی کا لیوڈیوں میں لکھا گیا اگر آپ ایماء اور آفیسر ہیں تو سب کا ریکارڈ منگوا کر چکا ہیڈ مکمل ہو چکا ہے سب کو طلوع واہسی کیا جائے

ڈائریکٹر اکرام اللہ صاحب جب PTS میں میں تعینات ہوئے تو سالہ کو بلا کر اپنے نکلے پہ اپنی فیملی کے پاس بھیجا تو ڈائریکٹر صاحب کی بیوی نے سالہ کو کہا کہ آپ ادھر رہ کر موت کو بڑھانے کے بجائے نکلے پہ آجایا کرو میرے بچوں کو سنبھالا کرو میرے پاؤں اور ناگوں کی مالش کیا کرو سالہ نے اس کام سے صاف انکار کیا سالہ نہ کہا کہ سالہ محنت کر کے ادھر تک پہنچی سالہ ہرگز یہ کام نہیں کرے گی تو ڈائریکٹر صاحب کی بیوی کے اصرار پر سالہ نے ماہرہ مغل چینی سے ایک کام والی لکڑی خانہ نام کی عورت ڈوٹھہ کرانگور کھ کر دی جو ایک مہینہ کام کرنے کے بعد تنخواہ کا مطالبہ کیا تو صاحب کی بیوی اور سالہ نے لے کہا کہ جس نے آپ کو کام پر رکھا ایسے تنخواہ بھی وہی دے گی تو سالہ نے اپنی عزت بچانے کے لیے بڑی مشکل سے اسکو تاکہ 17000 روپیہ اپنی تنخواہ سے دیا

کچھ دن کے بعد صاحب کی بیوی نے پھر سالہ سے کہا شروع کر دیا آپ رات کو ادھر آؤ اور آئی پی ٹی ایس ماہرہ سے میرے خاوند کو کالیں دو ہمیں رجسٹریشن شروع کر دیں۔ سالہ کے خاوند نے فون کر کے بتایا کہ RI پی ٹی ایس عام علی شاہ کو فون کیا جسکی کال ریکارڈنگ موجود ہے اس دن RI pts ماہرہ سے ایک دن کے لیے کدو سے ایک عورت لاکر چھوڑی سالہ کے اس دن دن چھانٹے پر ڈائریکٹر صاحب نے رجسٹر میں حاضری کا پتہ بنا کر لاسٹ وارنگ کی

سالہ نے پھر وہاں میں آکر پھر ایک مہینہ نام کی کام والی رکھ کر دی جس نے تقریباً ایک مہینہ پانچ دن کام کیا تنخواہ کا مطالبہ کیا تو پتہ لگا جا کر اس سے نو جس نے نہیں رکھا ایسے وہاں ہی وجہ سے کام چھوڑ کر چلی گئی اور تنخواہ کیلئے وہ کام والی بھی اب روڈ لکھی گیا ہے سالہ کے کمر پیسے مانگنے آتی ہے سالہ اب کیم پہ تنخواہ لیکر اسکو بھی 17000 روپیہ ادا کرے گی

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 22. 2024/04/03



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مترقی لیو پر ہو کر 2024/05/10 کو واپسی ہے CLI اور SRC نے ملکر جناب ڈائریکٹر صاحب کو غلط بریف کیا ڈائریکٹر صاحب نے درخواست پڑھ کر لکھا پھر SRC کو سالانہ نے استدعا کی کہ آپ نے درخواست پلٹا کر پورٹ کی ہے جناب SRC نے کہا میں اپنے کام کو سچ سمجھتا ہوں آپ pliz مجھے میرے کام کے متعلق نہ بتائیں سالانہ نے کہا اگر زیادہ نہیں تو کم چھٹی کروادو سالانہ نے SRC کو بتایا کہ سالانہ نے 2019 سے لیکر ابھی تک کو چھٹی نہیں لی نہ ہی درخواست دی ہے ضرورت نہیں تھی اب ضرورت ہے تو آپکو ریکورٹ کرتی ہوں میرے ساتھ زیادتی نہ کرو میری مجبوری ہے تو جناب نے کہا آپ کی اتنی سروس نہیں ہے جتنی چھٹی آپ گزار چکی ہو میرانی کر کے نوکری کرو AM Soryy کہہ کر میری درخواست لیکر ڈائریکٹر صاحب کے آفس چلا گیا اور 10/15 منٹ بعد واپس آیا میری درخواست مجھے دکھائی جس کے اوپر فائل لکھا تھا میں نے اپنے موبائل میں درخواست کی کچھل میری درخواست داخل دفتر کردائی کاپی ہراولف ہے سالانہ کو اب پتا چلا ہے کہ سالانہ کی سروس بک (امثال نامہ) سے SRC نے چھٹی کا پتلیس فارم بھی پھاڑا ہوا ہے جس کے بارے میں SRC سے متعلق معلومات کی گئی تو کول مول جواب دیتا ہے اس انکوٹری کی وجہ سے فارم پھاڑنا اپنے آپ کے IG بھنے کے برابر ہے گواہ HC و سیم کے سامنے CLI صاحب نے ریڈراگل شاہ کے پاس کہہ کر خود بول کر رپورٹ کردائی ریڈراگل شاہ صاحب نے CLI کو کہا بھی کہ غلط رپورٹ نہ کرواؤ CLI نے کہا کچھ نہیں ہوتا فرما رہے ساتھ میں گواہ سیم HC کا بیان ہراولف ہے

سالانہ کی درخواست حقیقت پر مبنی ہونے کی وجہ مجبوری سالانہ نے مورخہ 16 اپریل 2024 کو اپنے جائز عرض معروض کیلئے پیش ہونے کے لیے درخواست دی SRC اور CLI نے ملکر غائب کر دی درخواست کاپی ہراولف ہے۔ 23 اپریل 2024 کو دن Am 10.40 پر کال کر کے SRC سے بات کی تقریباً 8 منٹ بات ہوئی SRC نے کہا آپ مجھے کدھر سے لیورول منگوا کر دو میں آپ کی چھٹی کروادوں گا سالانہ نے CFO پشاور رابطہ کر کے لیورول منگوا کر SRC کو PDF دلایا یہ کیا جسکے سکرین شارٹ ہراولف ہے پھر شام کو 08:13 pm پر کال کر کے SRC سے پانچ منٹ بات کی تو SRC نے کہا کہ سب سے پہلی درخواست دو چھٹی ہو جائے گی بے فکر رہیں جسکے سکرین شارٹ ہراولف ہے سالانہ نے مورخہ 24 اپریل کو SRC کے کہنے پر 90 دن رخصت کلاں کیلئے درخواست دی جو کہ 29 اپریل کو چھٹی کے متعلق SRC سے دریافت کیا گیا تو SRC نے کہا کہ آپکی درخواست فائل ہو گئی ہے CLI صاحب نے آپکی چھٹی کروانے سے منع کیا ہے سالانہ نے استدعا کی کہ سالانہ کو جناب ڈائریکٹر صاحب پہ پیش کیا جائے تو SRC نے کہا کہ آپ CLI کو درخواست دو جائز عرض معروض کیلئے پیش ہونے کیلئے البتہ میری یہ درخواست بھی داخل دفتر ہو گئی کاپی ہراولف ہے یہ درخواست ریڈراگل صاحب نے لکھی اور اپنے ہاتھوں سے SRC مجید کے حوالے کی

سالانہ نے اپنے جائز عرض معروض کی درخواست 28 اپریل کو لکھ کر 29 اپریل کو جناب CLI صاحب کو ڈائریکٹر صاحب پہ پیش ہونے کے لیے درخواست دی جو CLI صاحب نے فارورڈ نہیں کی اور میرے ساتھ انتہائی نازیبا الفاظ میں گفتگو کی درخواست کی کاپی ہراولف ہے

سالانہ کی طبیعت انتہائی خراب ہونے کی وجہ سے 2024/05/06 کو سالانہ نے ڈائریکٹر صاحب پہ پیش ہونے کے لیے درخواست دی اس میں لکھا کہ اگر سالانہ پیش نہ کیا تو السران بالا کو شکایت کرے گی سالانہ کے سامنے CLI نے درخواست پھاڑ کر

چیک دی اور کیا آپ کی طرح کی سٹا نے بہت دیکھی ہیں ان سٹاں والا کو شکایت کرنے والی اپنے کام سے کام رکھو درخواست کا پی ہوا  
لف ہے

البتہ مورخہ 2024/05/07 کو جناب RI صاحب کو جعلی کی درخواست دی اسے اپنا ریڈر سمجھ کر CLI صاحب کو  
درخواست فار دور کرنے کے لیے اسکے ریڈر اکل شاہ کے نمبر پر فون بھی کیا سالہ نے مورخہ 2024/05/07 کو جناب CLI صاحب نے اس پر رپورٹ  
کی کہ سٹاف کا ایک ممبر رخصت 90 دن کلاں پر ہے جس پر RI صاحب PTS انسپرو محرر PTS انسپرو ریڈر CLI دیکر سٹاف نے  
مذکورہ CLI کی فیس بھی کہیں ایک مجبور عورت کے ساتھ اس طرح نہ کر لیکن CLI نے کہا کہ مجبور عورت کو کس نے کہا ہے کہ  
نو کری کرے جبکہ سٹاف کا کوئی ممبر رخصت کلاں پر نہ ہے جبکہ ایک لیڈ ریڈر مٹری لیو پر تھی جسکی 10/05/2024 یعنی 3 دن بعد  
واپس ہے کا پی ہوا لہذا ہے اور ساتھ مجھے CLI صاحب نے کہا جب تک میں PTS انسپرو میں ہوں انکو جعلی نہیں ملے گی اگر جعلی ملی  
خلع واپس کرواؤں گا وجہ عداوت سالہ کے مضامین میں فریڈمز کا مجھے نمبر حاصل کر کے پاس ہونے کی وجہ سے جیل میں ہوا اور سالہ کے  
ساتھ CLI نے 5/6 سالہ کے ساتھ نازیبا الفاظ میں گفتگو کی اور سالہ کے سخت جواب دینے کی وجہ سے جیل میں رہا ہے اسی وجہ  
کی بنا پر سالہ کا مضامین بھی آج تبدیل کر دیا جو کہ سالہ نے آدھا مکمل کیا ہوا تھا اور سالہ کو نیا مضامین دے دیا گیا جو شروع سے  
پڑھانا ہے سالہ کوئی بھی مضامین ہو پڑھا سکتی ہے سالہ نے 27 مارچ کو مضامین تبدیل کرنے کیلئے درخواست دی جسے رد کر دیا اب ایک  
سینے دس دن بعد مضامین تبدیل کرنا سمجھ سے بالاتر اور بدعتی پر مبنی ہے اس طرح کسی کی کی ہوئی عت لے کر کسی اور کو دینا انسانی  
ہے کا پی مذکورہ CLI ایک عورت کے ساتھ حد بازی سے معلوم ہوتا ہے کہ وہ پولیس کی وردی میں چھپا ایک کریمنلز ڈویژن کا ٹاک  
فون ہے مورخہ 2024/05/08 کو سالہ طبیعت زیادہ خراب ہونے کی وجہ سے KATH انسپرو مٹی میڈیکل چیک اپ اور ٹیسٹ  
کروانے کے بعد چھپا کہ سالہ کو لیسریہ کان اور اونچا پائوری ٹیسٹ پالو ہے اس وجہ سے سالہ کی طبیعت زیادہ خراب راتی ہے اسکے  
بعد سالہ نے 5/4 میڈیکل چیک اپ کروایا اور سالہ کی طبیعت انتہائی خراب ہے ڈاکٹر صاحب نے سالہ کو سترہ کر کے زیادہ  
کیزے رہنے و وزن اٹانے زیادہ دیر پاؤں نکال کر بیٹھنے سے منع کیا ہے جسکی وجہ سے سالہ نے مورخہ 17 مئی 2024 کو اپنا مضامین کسی اور  
نمبر کے حوالہ کرنے کے لیے درخواست دی سالہ ملت حال میں ہے ڈاکٹر کی رپورٹ کے مطابق 7 جون 2024 سے میٹری لیو بنتی ہے  
جسکے لی نے سالہ نے مورخہ 2024/05/27 کو KATH انسپرو سے میڈیکل چیک اپ کروا کر آپ جناب کو درخواست کے ساتھ  
میڈیکل انٹراساؤنڈ رپورٹ لف کر کے میٹری لیو کے لیے استدعا کی جو آپ جناب نے اپنے اختیارات کا پابندی استعمال کرتے ہوئے انسانی  
حقوق کی خلاف ورزی کی سالہ فریب بے سہارہ اور عزت دار عورت ہے لیکن سالہ کی طبیعت پہلے سے ہی سخت خراب ہے تمام  
میڈیکل رپورٹ ہوا لہذا ہے

سی ایل آئی پی لی ایس انسپرو SI ہے اور انسپٹر کے ریک ٹاکر IG صاحب کا حکم کی خلاف ورزی کرتا ہے جبکہ IG صاحب کا  
حکم ہے کہ کوئی بھی پولیس آفیسر فلا ریک نہیں لگائے گا

2024/05/29

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4 Anwar G

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OFFICE OF THE  
DIRECTOR  
POLICE TRAINING SCHOOL, MANSHERA  
Office Phone/Fax #: 0997-540850  
Email: pismanshera@gmail.com

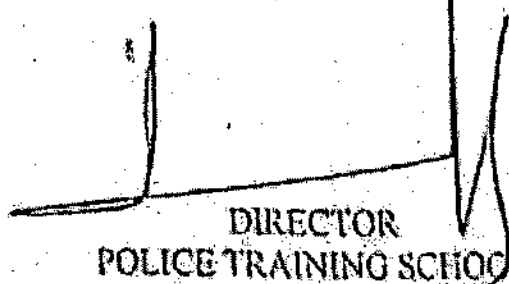
No. 1196 PA/PTS dated Manshera the 24-05-2024

Lady HCL/ Kosar Bibi No. 647

EXPLANATION

It has come into the notice of the undersigned that you submitted an application/complaint to the high-ups. In this connection, Director School of Intelligence Abbottabad has initiated an enquiry. Enquiry Officer summoned to Chief Law Instructor and SRC of this office to appear before him at School of Intelligence Abbottabad on 25.05.2024 to enquire the matter. You deliberately violate of the rules and regulations of the Police Department and break the chain of command, and also avoid submission of application/complaint to the undersigned alongwith proper documents & medical reports. Your this act shows lack of interest towards official duties and leads to gross misconduct.

You are hereby directed to explain your position, as to why stern departmental action should not be taken against you. Your written reply should be reached to the undersigned within 03 days, otherwise, it shall be presumed that you have nothing to offer your defence and ex-parte action should be taken against you.

  
DIRECTOR  
POLICE TRAINING SCHOOL  
MANSEHRA

Attested  
A.T.C

Annex (50)

**BEFORE THE PESHAWAR HIGH COURT  
BENCH ABBOTTABAD**


W.P. No. 627-1-2024

Kosar Bibi Head constable Belt No. 647 of District  
Police Mansehra presently serving at Police  
Training School Mansehra. .... **Petitioner**

**VERSUS**

- (1) The, Inspector General of Police, Khyber  
Pakhtunkhwa, Peshawar.
- (2) The, Additional Inspector General of Police,  
Training, Khyber Pakhtunkhwa, Peshawar.
- (3) The, DIG, Training, Khyber Pakhtunkhwa,  
Peshawar.
- (4) The, Director/Principle, Police Training School,  
Mansehra.
- (5) The, Chief Law Instructor Police Training School,  
Mansehra.
- (6) The Service Record Clerk, Police Training School,  
Mansehra.
- (7) LFC Sidra Shabir Belt No. 1477, District Police  
Mansehra.

..... **Respondents**

Attested  
A.T.C  


(8)

WRIT PETITION UNDER ARTICLES 199 OF  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN 1973 FOR ISSUING/GRANTING  
THE MATERNITY LEAVE TO THE  
PETITIONER ACCORDING TO THE KHYBER  
PAKHTUNKHWA CIVIL SERVANTS REVISED  
LEAVE RULES 1981 AND OTHER RELEVANT  
LAWS, NON ISSUING, REFUSAL AND  
CONSEQUENTLY THE IMPUGNED TRANSFER  
ORDER BEARING NO. 4892-93/E-IV DATED  
PESAHWAR 06.06.2024 ARE WRONG,  
ILLEGAL, AGAINST THE LAW, RULES,  
REGULATION, WITH MALAFIDE INTENTION,  
DISCRIMINATORY, ARBITRARY, PERSONAL  
GRUDGE, PERVERSE, CAPRICIOUS AGAINST  
THE PRINCIPLE OF NATURAL JUSTICE AND  
ALSO AGAINST THE FUNDAMENTAL RIGHTS  
OF THE PETITIONER AND AGAINST THE  
REVERENT RULES/LAW HENCE LIABLE TO  
BE CANCELLED.

Respectfully shewith!

Facts



(52)

1. That, the petitioner is a bona fide resident of District Mansehra.

**(copy CNIC & Domicile annexed as annexure "A").**

2. That, the petitioner served the police department since 13.08.2014 and initially posted in District Police Mansehra.

3. That, in year 2018 the petitioner transfer from District Police Mansehra to Police Training School Mansehra.

4. That, petitioner performing her duty devotedly, punctuality and her performance being a law instructor up to the mark.

5. That, petitioner during her service is eligible in all respect entitled for leaves according to the relevant rules and regulation, in this respect the petitioner applied to her high ups for the sanction of her leaves but in vain, even the petitioner suffered Malria and stomach but respondents refused to grant the leave.

**(copy of applications and record are annexed as annexure "B").**

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6. That, petitioner is married and educated up to Masters degree during her service she performed the best of her ability and receive many appreciation/award by the competent authority.

**(copy of certificates are annexed as annexure "C").**

7. That, petitioner also qualified the lower course and passed the requisite training/course.

**(copies of course certificate and letters are annexed as annexure "D").**

8. That, the petitioner is well equipped in relevant field and having a good experience and reputation in Police tanning schools. The students of petitioner obtaining the excellent marks in the relevant subject.

9. That, now a day's petitioner pregnant, the petitioner visit the doctor concerned, the doctor advice the petitioner to avail the maternity leave, the petitioner applied to the official respondents for availing the maternity leave according to the relevant rules, law by submitting applications with medical records.

**(copies of applications and medical records are annexed as annexure "E").**

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10. That, despite granting the maternity leave to the petitioner, astonishingly transfer the petitioner from PTS Manserha to District Police Mansehra and adjust the respondent No. 07 in the place of the petitioner vide impugned order bearing No. 49892-93/E-IV dated Peshawar 06.06.2024 and also verbally declined/non granting the maternity leave.

**(copy of impugned order dated 06.06.2024 annexed as annexure "F").**

11. That, the adamant attitudes of the respondents the petitioner submitted an application before the respondent No. 01 for her genuine grievances.

**(copy of application is annexed as annexure "G").**

12. That, after submission of an application respondents initiated inquiry against the petitioner and also called the explanation.

**(copy of explanation notice are annexed as annexure "H").**

13. That, petitioner being aggrieved, having no other adequate, alternate, efficacious or speedy remedy except to invoke the constitutional jurisdiction of this



Honourable Court, inter alia, on the following grounds:

**GROUND:**

- A. That, refusal/non granting the maternity leave to the petitioner resulting the impugned order are wrong, illegal, against the law, rules, regulation, against the service revised leave rules 1981 KPK, with malafide intention, discriminatory, arbitrary, perverse, personal grades, capricious against the principle of Natural Justice and also against the fundamental rights of the petitioner hence impugned transfer order liable to be cancelled/struck down and the petitioner be entitled for grant of maternity leave according to the law.
- B. That, rule 10 of the Khyber Pakhtunkhwa Civil servants revised leave rules 1981 female being a civil servant entitled for the maternity leave.
- C. That, as per law, rules and regulations female employees during

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586

their pregnancy are entitled for maternity leave. The all departments regularly follow and granted the maternity leave, refusal on the part of respondents are result to the personal grudge.

D. That, petitioner performing her duty according to the law, rules and regulation and also perform her duty to great zeal and zest. Petitioner having unblemished service record as well.

E. That, the petitioner having a good experience in PTS as instructor, well trained and petitioner performance acknowledged by her high-up's.

F. That, it is well established principle "**right man for right job or the one who knows the skills required for job**" the respondent No.07 having no knowledge and experience regarding instructor/teaching hence petitioner is entitled to be hold the post in question.

G. That, before issuing impugned order no notice was served by the petitioner nor given any chance of



hearing, hence the impugned order against the principle of Natural Justice and petitioner was unheard by the official respondents.

- H. That, it is well established law during the pendency of application for grant of maternity leave the petitioner cannot be transferred nor any adverse action taken against her.
- I. That, act of the respondents are also against the norms of justice, equity and fair play.
- J. That, the powers or jurisdiction are vested in an authority to exercise it justly, fairly, honestly, judiciously and in accordance with the mandate of law, rules and regulations but the respondents have transgressed upon their powers while not adjusted/posted the petitioner to his original post.
- K. That, it is an inalienable right to enjoy the protection of law and to be treated in accordance with law, rules and regulations but this right of the petitioner has been infringed

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by the respondents in a sheer malafide manner.

L. That, the notices regarding intimation of filing of Writ Petition have been sent to respondents through registered posts.

**(Copies of Notices Annexed  
as annexure "I")**

### **PRAYER**

**IT IS, THEREFORE, MOST RESPECTFULLY  
PRAYED THAT THIS HONOURABLE COURT  
MAY GRACIOUSLY BE PLEASED TO:-**

- A). Direct the respondents to grant/sanctioned the maternity leave to the petitioner.
- B). Declare the impugned order No. 4892-93 dated Peshawar 06.06.2024 wrong, illegal, against the law, arbitrary, discriminatory, perverse, capricious, result of personal grudge and also against the fundamental rights of the petitioner hence liable to be cancelled.
- C). Issue any other writ or order or direction to respondent and pass such other orders

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and further orders as may be deemed necessary on the facts and in circumstances of the case.


**INTERIM RELIEF:**

It is further very humbly prayed that in the meanwhile the impugned order bearing No. 4892-93 dated 06.06.2024 may please be suspended, inquiry proceeding may please be stopped and respondents be restrained from taking any adverse action against the petitioner and also be restrained from stoppage of salary of the petitioner till the decision of the instant writ petition and till the decision of instant writ petition the maternity leave may also be granted/sanctioned to the petitioner.

**Dated: 11.06.2024.**

Kosar Bibi  
..... Petitioner

Through



**SYED ASIF SHAH  
ADVOCATE HIGH COURT  
At Mansehra**



60

11/06/2024

**BEFORE THE PESHAWAR HIGH COURT  
BENCH ABBOTTABAD**

W.P No \_\_\_\_\_ A/2024

Kosar Bibi..... **Petitioner**

**VERSUS**

The, Inspector General of Police, Khyber  
Pakhtunkhawa, Peshawar etc..... **Respondents**

**WRIT PETITION**  
**AFFIDAVIT!**

I, Kosar wife of Ali Aksar, Head constable Belt No. 647 of District Police Mansehra presently serving at Police Training School Mansehra resident of Matsrian Tehsil & District Mansehra, do hereby solemnly affirm and declare on oath that the contents of the foregoing Writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

**Dated: 11.06.2024**

**Kosar Bibi  
(DEPONENT)**

**CNIC \_\_\_\_\_**



**BEFORE THE PESHAWAR HIGH COURT  
BENCH ABBOTTABAD**

W.P No \_\_\_\_\_ A/2024

Kosar Bibi..... **Petitioner**

**VERSUS**

The, Inspector General of Police, Khyber  
Pakhtunkhawa, Peshawar etc..... **Respondents**

**WRIT PETITION**  
**CORRECT ADDRESSES OF THE PARTIES**

**PETITIONERS**

Kosar Bibi Head constable Belt No. 647 of  
District Police Mansehra presently serving at  
Police Training School Mansehra

**RESPONDENS**

- (1) The, Inspector General of Police, Khyber  
Pakhtunkhawa, Peshawar.
- (2) The, Additional Inspector General of Police,  
Training, Khyber Pakhtunkhwa, Peshawar.
- (3) The, DIG, Training, Khyber Pakhtunkhwa,  
Peshawar.
- (4) The, Director/Principle, Police Training School,  
Mansehra.
- (5) The, Chief Law Instructor Police Training School,  
Mansehra.
- (6) The Service Record Clerk, Police Training School,  
Mansehra.
- (7) LFC Sidra Shabir Belt No. 1477, District Police  
Mansehra.

**Dated: 11.06.2024**

Kosar Bibi  
..... **Petitioner**

Through

**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**  
**At Mansehra**

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**BEFORE THE PESHAWAR HIGH COURT  
BENCH ABBOTTABAD**

W.P No \_\_\_\_\_ A/2024

Kosar Bibi..... **Petitioner**

**VERSUS**

The, Inspector General of Police, Khyber  
Pakhtunkhawa, Peshawar etc..... **Respondents**

**WRIT PETITION**

**CERTIFICATE,**

Certified that no such like writ Petition has  
ever been preferred nor decided from any  
court.


**LIST OF LAW BOOKS.**

1. Constitution of Islamic Republic of Pakistan,  
1973.
2. Other Law books as per need.

**Dated: 11.06.2024**

Kosar Bibi  
..... **Petitioner**

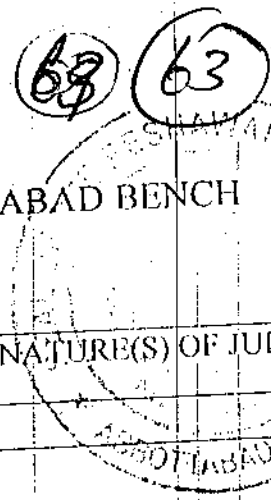
Through

  
**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**  
**At Mansehra**

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PESHAWAR HIGH COURT, ABBOTTABAD BENCH  
FORM 'A'  
FORM OF ORDER SHEET



Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE(S) OF JUDGE(S)
1	2
24.06.2024.	<p><b>WP No. 627-A/2024</b></p> <p><b>Present:-</b> Syed Asif Shah, Advocate for petitioner.</p> <p style="text-align: center;">***</p> <p>Learned counsel for petitioner contends that the application for maternity leave of the petitioner has not been accepted despite the fact that the concerned Gynaecologist has given the petitioner an expected date of delivery as 21.07.2024. Learned counsel for the petitioner further contended that not considering the request of petitioner for the grant of maternity leave, was not only against the fundamental right of the petitioner but also against all norms of the society. The learned counsel also contended that in such a condition, the lady has also been transferred and directed to take charge at another station which order was also not appropriate in the circumstances of the case. Mr. Basharat Khan, learned Additional Advocate General, present in Court in other cases, accepted notice of this petition on behalf of respondents. He shall file para-wise comments to the instant petition within three days. To come up for arguments on 02.07.2024.</p>

Received by the Trial Judge  
 PESHAWAR  
 17/06/2024  
 Peshawar High Court and Bench  
 Abbottabad Under Sec. 25 of Ord.

/s/

(Jamil)

(D.B) Hon'ble Mr. Justice Waqar Ahmad  
Hon'ble Mr. Justice Muhammad Fawzan Wali

Anex I (66)

No. 873

For In Stamp RGL124881793  
unit... RAD00540736  
the initial weight...  
Post Office Guide or on which no  
acknowledgement is due.

Rs. Ps.

RADIO

Received a registered  
addressed to

Secretary

Date Stamp Home?

\*Write here "letter", "postcard", "packet" or "parcel"  
with the word "insured" before it when necessary.

Initials of Receiving Officer Insured for Rs. (in figures) (in words)

If insured.

Insurance fee Rs. Ps. (in words) Weight Kilo Grams  
Name and address of sender

No. 871

For In Stamp RGL124881791  
unit... RAD00540734  
the initial weight...  
Post Office Guide or on which  
acknowledgement is due.

Rs. Ps.

RADIO

Received a registered  
addressed to

Chief Secretary

Date Stamp

\*Write here "letter", "postcard", "packet" or "parcel"  
with the word "insured" before it when necessary.

Initials of Receiving Officer Insured for Rs. (in figures) (in words)

If insured.

Insurance fee Rs. Ps. (in words) Weight Kilo Grams  
Name and address of sender

No. 872

For In Stamp RGL124881792  
unit... RAD00540735  
the initial weight...  
Post Office Guide or on which  
acknowledgement is due.

Rs. Ps.

RADIO

Received a registered  
addressed to

Police

Date Stamp

\*Write here "letter", "postcard", "packet" or "parcel"  
with the word "insured" before it when necessary.

Initials of Receiving Officer Insured for Rs. (in figures) (in words)

If insured.

Insurance fee Rs. Ps. (in words) Weight Kilo Grams  
Name and address of sender

Alerted  
J.T.C.

65

To

The worthy, Secretary Home and Tribal Affairs  
Khyber Pakhtunkhawa, Peshawar.

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED TRANSFER  
ORDER BEARING NO. 4892-93/E-IV DATED PESAHWAR 06.06.2024.**

**Respected Sir!**

1. That, the Appellant is a bona fide resident of District Mansehra.
2. That, the Appellant served the police department since 13.08.2014 and initially posted in District Police Mansehra.
3. That, in year 2018 the Appellant transfer from District Police Mansehra to Police Training School Mansehra.
4. That, Appellant performing her duty devotedly, punctuality and her performance being a law instructor up to the mark.
5. That, Appellant during her service is eligible in all respect entitled for leaves according to the relevant rules and regulation, in this respect the Appellant applied to her high ups for the sanction of her leaves but in vain, even the Appellant suffered Malria and stomach diseased but respondents refused to grant the leave.
6. That, Appellant is married and educated up to Masters decree during her service she performed the best of her ability and receive many appreciation/award by the competent authority.
7. That, Appellant also qualified the lower course and passed the requisite training/course.
8. That, the Appellant is well equipped in relevant field and having a good experience and reputation in Police tanning schools. The

66

students of Appellant obtaining the excellent marks in the relevant subject.

9. That, now a day's Appellant pregnant, the Appellant visit the doctor concerned, the doctor advice the Appellant to avail the maternity leave, the Appellant applied to the concerned officer for availing the maternity leave according to the relevant rules, law by submitting applications with medical records.
10. That, despite granting the maternity leave to the Appellant, astonishingly transfer the Appellant from PTS Mansehra to District Police Mansehra and adjust the one LFC Sidra Shabir belt No. 1477 transfer/adjust in the place of the Appellant vide impugned order bearing No. 49892-93/E-IV dated Peshawar 06.06.2024 and also verbally declined/non granting the maternity leave.
11. That, Appellant previously submitted an application before worthy IGP, after submission of an application the high-up's officials initiated inquiry against the Appellant and also called the explanation.
12. That, refusal/non granting the maternity leave to the Appellant resulting the impugned order are wrong, illegal, against the law, rules, regulation, against the service revised leave rules 1981 KPK, with malafide intention, discriminatory, arbitrary, perverse, personal grades, capricious against the principle of Natural Justice and also against the fundamental rights of the Appellant hence impugned transfer order liable to be cancelled/struck down and the Appellant be entitled for grant of maternity leave according to the law.
13. That, rule 10 of the Khyber Pakhtunkhwa Civil servants revised leave rules 1981 female being a civil servant entitled for the maternity leave.

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14. That, as per law, rules and regulations female employees during their pregnancy are entitled for maternity leave. The all departments regularly follow and granted the maternity leave, refusal on the part of high-ups officials result to the personal grudge.
15. That, before issuing impugned order no notice was served by the Appellant nor given any chance of hearing, hence the impugned order against the principle of Natural Justice and Appellant was unheard by the official high-up's.
16. That, it is well established law during the pendency of application for grant of maternity leave the Appellant cannot be transferred nor any adverse action taken against her.

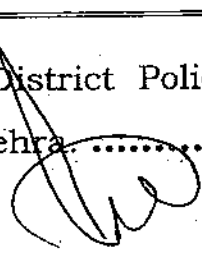
**PRAYER**

It Is, therefore, Most Respectfully Prayed that the impugned order No. 4892-93 dated Peshawar 06.06.2024 may please be withdrawn/ cancelled.

Dated: 03.07.2024

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Kosar Bibi Head constable Belt No. 647 of District Police Mansehra presently serving at Police Training School Mansehra. .... **Appellant**





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To

The worthy, Chief-Secretary  
Khyber Pakhtunkhawa, Peshawar.

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED TRANSFER  
ORDER BEARING NO. 4892-93/E-IV DATED PESAHWAR 06.06.2024.**

**Respected Sir!**

1. That, the Appellant is a bona fide resident of District Mansehra.
2. That, the Appellant served the police department since 13.08.2014 and initially posted in District Police Mansehra.
3. That, in year 2018 the Appellant transfer from District Police Mansehra to Police Training School Mansehra.
4. That, Appellant performing her duty devotedly, punctuality and her performance being a law instructor up to the mark.
5. That, Appellant during her service is eligible in all respect entitled for leaves according to the relevant rules and regulation, in this respect the Appellant applied to her high ups for the sanction of her leaves but in vain, even the Appellant suffered Malria and stomach diseased but respondents refused to grant the leave.
6. That, Appellant is married and educated up to Masters decree during her service she performed the best of her ability and receive many appreciation/award by the competent authority.
7. That, Appellant also qualified the lower course and passed the requisite training/course.
8. That, the Appellant is well equipped in relevant field and having a good experience and reputation in Police tanning schools. The

68

students of Appellant obtaining the excellent marks in the relevant subject.

9. That, now a day's Appellant pregnant, the Appellant visit the doctor concerned, the doctor advice the Appellant to avail the maternity leave, the Appellant applied to the concerned officer for availing the maternity leave according to the relevant rules, law by submitting applications with medical records.
10. That, despite granting the maternity leave to the Appellant, astonishingly transfer the Appellant from PTS Mansehra to District Police Mansehra and adjust the one LFC Sidra Shabir belt No. 1477 transfer/adjust in the place of the Appellant vide impugned order bearing No. 49892-93/E-IV dated Peshawar 06.06.2024 and also verbally declined/non granting the maternity leave.
11. That, Appellant previously submitted an application before worthy IGP, after submission of an application the high-up's officials initiated inquiry against the Appellant and also called the explanation.
12. That, refusal/non granting the maternity leave to the Appellant resulting the impugned order are wrong, illegal, against the law, rules, regulation, against the service revised leave rules 1981 KPK, with malafide intention, discriminatory, arbitrary, perverse, personal grades, capricious against the principle of Natural Justice and also against the fundamental rights of the Appellant hence impugned transfer order liable to be cancelled/struck down and the Appellant be entitled for grant of maternity leave according to the law.
13. That, rule 10 of the Khyber Pakhtunkhwa Civil servants revised leave rules 1981 female being a civil servant entitled for the maternity leave.

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14. That, as per law, rules and regulations female employees during their pregnancy are entitled for maternity leave. The all departments regularly follow and granted the maternity leave, refusal on the part of high-ups officials result to the personal grudge.
15. That, before issuing impugned order no notice was served by the Appellant nor given any chance of hearing, hence the impugned order against the principle of Natural Justice and Appellant was unheard by the official high-up's.
16. That, it is well established law during the pendency of application for grant of maternity leave the Appellant cannot be transferred nor any adverse action taken against her.

**PRAYER**

It Is, therefore, Most Respectfully Prayed that the impugned order No. 4892-93 dated Peshawar 06.06.2024 may please be withdrawn/ cancelled.

Dated: 03.07.2024

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Kosar Bibi Head constable Belt No. 647 of District Police Mansehra presently serving at Police Training School Mansehra..... **Appellant**

871

To

The worthy, Inspector General of Police,  
Khyber Pakhtunkhawa, Peshawar.

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED TRANSFER**  
**ORDER BEARING NO. 4892-93/E-IV DATED PESHAWAR 06.06.2024.**

**Respected Sir!**

1. That, the Appellant is a bona fide resident of District Mansehra.
2. That, the Appellant served the police department since 13.08.2014 and initially posted in District Police Mansehra.
3. That, in year 2018 the Appellant transfer from District Police Mansehra to Police Training School Mansehra.
4. That, Appellant performing her duty devotedly, punctuality and her performance being a law instructor up to the mark.
5. That, Appellant during her service is eligible in all respect entitled for leaves according to the relevant rules and regulation, in this respect the Appellant applied to her high ups for the sanction of her leaves but in vain, even the Appellant suffered Malria and stomach diseased but respondents refused to grant the leave.
6. That, Appellant is married and educated up to Masters degree during her service she performed the best of her ability and receive many appreciation/award by the competent authority.
7. That, Appellant also qualified the lower course and passed the requisite training/course.
8. That, the Appellant is well equipped in relevant field and having a good experience and reputation in Police training schools. The

students of Appellant obtaining the excellent marks in the relevant subject.

9. That, now a day's Appellant pregnant, the Appellant visit the doctor concerned, the doctor advice the Appellant to avail the maternity leave, the Appellant applied to the concerned officer for availing the maternity leave according to the relevant rules, law by submitting applications with medical records.
10. That, despite granting the maternity leave to the Appellant, astonishingly transfer the Appellant from PTS Mansehra to District Police Mansehra and adjust the one LFC Sidra Shabir belt No. 1477 transfer/adjust in the place of the Appellant vide impugned order bearing No. 49892-93/E-IV dated Peshawar 06.06.2024 and also verbally declined/non granting the maternity leave.
11. That, Appellant previously submitted an application before your good self, after submission of an application the high-up's officials initiated inquiry against the Appellant and also called the explanation.
12. That, refusal/non granting the maternity leave to the Appellant resulting the impugned order are wrong, illegal, against the law, rules, regulation, against the service revised leave rules 1981 KPK, with malafide intention, discriminatory, arbitrary, perverse, personal grades, capricious against the principle of Natural Justice and also against the fundamental rights of the Appellant hence impugned transfer order liable to be cancelled/struck down and the Appellant be entitled for grant of maternity leave according to the law.
13. That, rule 10 of the Khyber Pakhtunkhwa Civil servants revised leave rules 1981 female being a civil servant entitled for the maternity leave.

(OP) (73)

14. That, as per law, rules and regulations female employees during their pregnancy are entitled for maternity leave. The all departments regularly follow and granted the maternity leave, refusal on the part of high-ups officials result to the personal grudge.
15. That, before issuing impugned order no notice was served by the Appellant nor given any chance of hearing, hence the impugned order against the principle of Natural Justice and Appellant was unheard by the official high-up's.
16. That, it is well established law during the pendency of application for grant of maternity leave the Appellant cannot be transferred nor any adverse action taken against her.

**PRAYER**

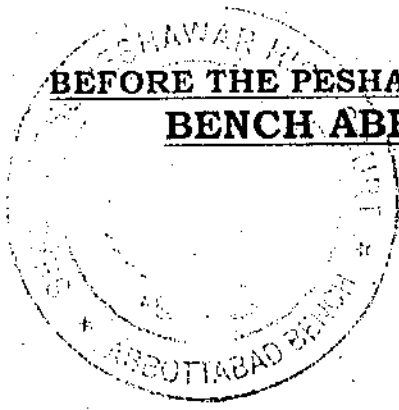
It Is, therefore, Most Respectfully Prayed that the impugned order No. 4892-93 dated Peshawar 06.06.2024 may please be withdrawn/ cancelled.

Dated: 03.07.2024

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Kosar Bibi Head constable Belt No. 647 of District Police Mansehra presently serving at Police Training School Mansehra. .... **Appellant**

Ann J (74)  
A3



**BEFORE THE PESHAWAR HIGH COURT,  
BENCH ABBOTTABAD**

CM. No. 54 A of 2024

IN

W.P No.627-A of 2024

Kosar Bibi ..... Petitioner

**VERSUS**

The Inspector General of Police, KPK  
Peshawar etc.....**Respondents.**

APPLICATION FOR RELEASE OF THE  
SALARY OF THE PETITIONER IN LIGHT OF  
THE ORDER DATED 24.06.2024 PASSED BY  
THIS HON'BLE COURT IN WP NO. 627-A/24.

Respectfully sheweth!

- 1) That, petitioner filed the above titled writ petition before this Hon'ble court against the impugned order and non granting the maternity leave.
- 2) That, petitioner also seek the interim relief from this Honourable court i.e

NO 1301  
10-07-2024

FILED TODAY

CLERK  
PESHAWAR HIGH COURT

Certified to be True Copy  
EXAMINER  
17 AUG 2024

Attended  
A.T.C

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"It is further very humbly prayed that in the meanwhile the impugned order bearing No. 4892-93 dated 06.06.2024 may please be suspended, inquiry proceeding may please be stopped and respondents be restrained from taking any adverse action against the petitioner and also be restrained from stoppage of salary of the petitioner till the decision of the instant writ petition and till the decision of instant writ petition the maternity leave may also be granted/sanctioned to the petitioner"

- 3) That, on dated 24.06.2024 this Honourable court issued/granted interim relief and restrain the respondents from not taking any adverse action and calling the comments from respondents.

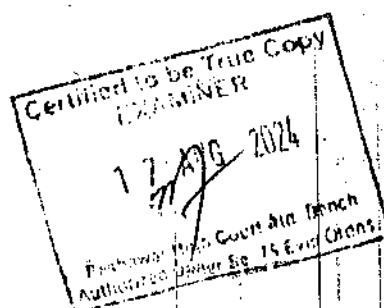
(Attested copy of order dated 24.06.2024 annexed as annexure "A").

- 4) That on 02.07.2024 the above said interim order was extended till the further order.

(Attested copy of order dated 02.07.2024 annexed as annexure "B").

FILED TODAY

THE JUDGE  
COURT OF APPEALS  
BOMBAY





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- 5) That, before issuing interim relief the petitioner also submitted her maternity leave application along with her medical record which were received by respondents on dated 20.06.2024.

(copy of Mad No. 30  
dated 20.06.2024  
annexed as annexure  
"C").

- 6) That, despite attending the court and knowingly that the case is pending before the Honourable court and the interim relief was also granted in the favour of the petitioner, but respondents deliberately stopped the salary of the petitioner, which act of respondents against the norms of the justice.

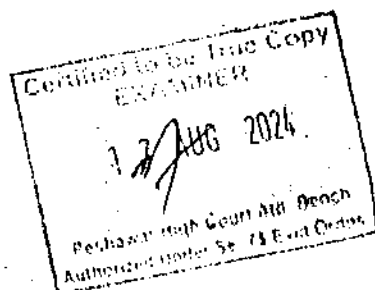
(copy of pay slip annexed  
as annexure "D").

- 7) That, now a days petitioner need huge amount for her treatment, if the salary is not release the petitioner suffer irreparable loss. Because there is not the question of single life but it is the question of two life.

FILED TODAY

AND REGISTERED  
PIC. ABDUL KADIR

10/7/24



73

**PRAYER:**

It is therefore very humbly prayed that on acceptance of the instant petition, the respondents be directed to release the salary of the petitioner implement the order dated 24.06.2024 passed by this Hon'ble court.

**Dated 06.07.2024**

**Kosar Bibi  
PETITIONER**

Through



**SYED ASIF SHAH  
ADVOCATE HIGH COURT  
At Mansehra**

Certified to be true Copy  
Exhibited  
13 AUG 2024  
Pakistan High Court and Bench  
Mansehra Under Sec. 15 of Ord.

**FILED TODAY**

**ADD. REGISTRAR  
P.H.C. MANSEHRA**

10/7/24

78

**BEFORE THE PESHAWAR HIGH COURT,  
BENCH ABBOTTABAD**

CM. No. 14 A of 2024

IN

W.P No.627-A of 2024

Kosar Bibi ..... Petitioner

**VERSUS**

The Inspector General of Police, KPK  
Peshawar etc.....**Respondents.**

**AFFIDAVIT!**

I, Syed Asif Shah Advocate High Court, do hereby undertake/solemnly affirm that the contents of fore-going contempt of court petition are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honorable court

Dated :06.07.2024

**SYED ASIF SHAH  
ADVOCATE HIGH COURT  
At Mansehra**

Enrollment in the Copy  
13/7/24  
2024  
Peshawar High Court Bench  
Abbottabad

3880/179

Receipt # 179

I certify that the above was verified solemn affirmation  
before me on this 7 day of July 2024 by  
Syed Asif Shah  
R/o. Mansehra

(DEPONENT)

who was identified  
by \_\_\_\_\_ who is personally known to me.

**ADDITIONAL REGISTRAR  
Peshawar High Court, Abbottabad Bench**

**FILED TO**  
ADD. REGISTRAR  
PHC, ABBOTTABAD BENCH  
10/7/24

IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM OF ORDER SHEET

Date of  
order or  
proceedings  
(1)

29.7.2024.

Order or other proceedings with signature of Judge(s).

(2)

C.M.No.516-A/2024 in  
W.P.No.627-A/2024.

Present:- Mr. Junaid Anwar Khan and Syed Asif  
Shah, Advocate for petitioner.

Mr. Sardar Basharat, A.A.G. for  
respondents.

\*\*\*

Dr. Khurshid Iqbal, J.:-

1. The petitioner Kosar Bibi seeks release of her salary. Though the learned A.A.G. vehemently argued that the petitioner has not reported in the Police Lines Manshra pursuant to her transfer order from the Police Training School Manshra, however, the learned counsel for the petitioner apprised the Court that she is still in the Police Training School Mahsehra and has not relinquished her charge pursuant to her transfer order. The admitting note, dated 24.6.2024, of this Court is self explanatory. As the question before this Court right now relates to the release of salary of the petitioner whereas her learned counsel stated at the bar that she is still serving at her position in the Police Training School, therefore, the instant C.M. is allowed. It is directed that her salary be released at the place of her present posting. The office is directed to list the main case in the 1<sup>st</sup> available D.B. after summer vacations.

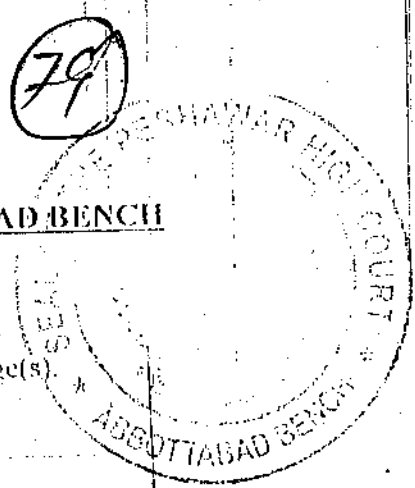
Announced.  
Di: 29.7.2024.

JUDGE

(S.B)

Hon'ble Mr. Justice Dr. Khurshid Iqbal

Announced



Handwritten signature or initials.

Handwritten signature of the Judge.

(80) (80)

Interim Relief.

Although this Court does not interfere in the matter of transfer of civil servants but since the issue of not granting the maternity leave is involved in the matter in hand, therefore, respondents are directed to refrain from taking any decision against the petitioner till the next date of hearing.

~~JUDGE~~  
JUDGE

24/6/24

15/7/24

29/7/24

22/5/24

Application of M. Leave.

(65) 2/3

Certified to be True Copy  
EXAMINER  
13/8/24  
President of the Court and District  
Magistrate, District Court, District

Annex

BETTER COPY

OFFICE OF THE DISTRICT POLICE OFFICER MANSEHRA

(KHYBER PAKHTUNKHWA POLICE)

No.7232/GB, dated 07.08.2024

The No.0997-920102 and fax No. 0997-920104

From

The District Police Officer,  
Mansehra

To

The Director,  
Police Training School  
Manshra

Subject:

Writ petition No. 627-A 2024-Salary of lady HC Kosar Bibi No.

Addendum.

Please refer to your office memo: No. 2040/HC/PTS dated 06.08.2024.

It is intimated that lady HC Kosar No.647 has not made his arrival in this district so far. She filed a petition before the Honourable High Court Bench Abbottabad for cancellation of her transfer order vide W.P No. 627-A/2024, the Honourable High Court Bench Abbottabad in CM No. 516-A/2024 has ordered that her salary be released at the place of her present posting. Since the lady HC, Kosar did not obey her transfer order and has not report at District Police line Mansehra and approached the High court therefore her salary cannot be released by this Office.

Furthermore, complainant refuse to take her salary from this office and approached the court for cancellation of her transfer order, original service Roll and LPC are returning herewith.

In the light of court order it is therefore requested that the slary of Lady HC Kosar No. 647 may please be closed from PTs Mansehra till the decision of Honourable court.

District Police Officer,  
Mansehra

No. 7233/GB

Copy submitted for favour of information to:

1. The inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region Abbottabad.
- 3.

District Police Officer,  
Mansehra

Attested  
A.T.C

Amex 1. 2. (789)

**BEFORE THE PESHAWAR HIGH COURT,  
BENCH ABBOTTABAD**

COC. No \_\_\_\_\_ A of 2024

**IN**

**W.P No.627-A of 2024**

Kosar Bibi Head constable Belt No. 647 of  
District Police Mansehra presently serving at  
Police Training School Mansehra... **Petitioner**

**VERSUS**

- (1) Ikram Ullah Khan, Director/Principle, Police Training School, Mansehra.
- (2) Liaqat, Senior Clerk/Pay officer, Police Training School, Mansehra.
- (3) Abdul Majeed, Service Record Clerk, Police Training School, Mansehra.
- (4) Sukhraj Inspector Legal, Police Training School, Mansehra.

.....**CONTEMNORS/RESPONDENTS**

**PETITION FOR INITIATING CONTEMPT OF  
COURT PROCEEDINGS AGAINST THE  
RESPONDENTS/ CONTEMNORS FOR NOT  
IMPLEMENTING THE ORDER DATED  
29.07.2024 PASSED BY THIS  
HONOURABLE COURT IN THE AFORESAID  
WRIT PETITION.**

**PRAYER: -**

**IT IS THEREFORE,** very respectfully prayed that on acceptance of this petition, the contemnors/respondents be proceeded against in accordance with the law on the subject for not implementing the order dated 29.07.2024 passed by this Honourable Court, and they further be directed/ordered to implement the order/judgment in hand in its true letter and spirit while releasing the salary of petitioner.

Respectfully sheweth!

- 1) That, the aforesaid writ petition was filed by the petitioner.

(Attested copies of writ petition is annexed as annexure "A").

- 2) That, the aforesaid writ petition was pending before this Honourable court.

- 3) That, interim relief was granted on dated 24.06.2024, regarding the no adverse action taken against the petitioner.

(Attested Copies of order dated 24.06.2024 is annexed as Annexure "B").



(86)

- 4) That, despite granting the interim order on dated 24.06.2024 respondents did not bother to release a salary of the petitioner, the petitioner moved a CM 516-A of 2024 which was allowed on 29.07.2024 and the Honourable court give the direction to the respondents to release the salary of the petitioner.

**(Attested copy of order dated 29.07.2024 annexed as annexure "C").**

- 5) That, the District Police Officer Mansehra also issue a letter No. 7233 dated 07.08.2024 to the director police Training school Mansehra in the light of the writ petition and order passed by the Honourable High Court dated 29.07.2024 regarding the release of the salary, because the petitioner not relinquish the charge and still the petitioner in District Police Training school Mansehra.

**(copy of letter dated 07.08.2024 annexed as annexure "D").**

- 6) That, the said order under implementation was duly communicated to the respondents by

(85)

office through proper channel, but respondents did nothing to implement the order/judgment so far.

- 7) That, being aggrieved, from willful action/inaction of the respondents, petitioners having no other remedy except to file the present petition inter alia on the following amongst other grounds.

**GROUND: -**

- A) That, contemnors/respondents are legally bound to implement the order/judgment of this Honourable, no sooner they get the same, but they badly failed to discharge their constitutional/legal duty by showing defiance towards the implementation of the order dated 29.07.2024.
- B) That, contemnors/respondents are showing complete defiance to the order of this Honourable Court by not implementing the same in its true letter and spirit, which act of the respondents have made them liable to be proceeded against in accordance with the law on the subject.

88

- C) That, this Honourable court, had clearly directed the respondents to release the salary of the petitioner, but despite passage of sufficient time, no step has been taken by respondents towards the release of salary of the petitioner.
  
- D) That, the petitioner suffering from advance pregnancy and need for a money for his treatment which is the basic and fundamental right of the petitioner to release the salary forthwith.
  
- E) That, the reluctance of the respondents not to release the salary of the petitioner despite the order of this Honourable court which show the adamant attitude of the respondents towards the petitioner, which suggest that the respondents having personal grudge, victimization and harassment of woman employee.
  
- F) That, vested rights of the petitioner are involved which is being denied to them by the respondents for the several months without any reason.



**PRAYER:**


**IT IS THEREFORE,** very respectfully prayed that on acceptance of this petition, the contemnors/respondents be proceeded against in accordance with the law on the subject for not implementing the order dated 29.07.2024 passed by this Honourable Court, and they further be directed/ordered to implement the order/judgment in hand in its true letter and spirit while releasing the salary of petitioner.

**Dated 05.09.2024**

KOSAR BIBI

**PETITIONER**

Through



**SYED ASIF SHAH  
ADVOCATE HIGH COURT**

88

**AFFIDAVIT!**

I, Kosar Bibi Head constable Belt No. 647 of District Police Mansehra presently serving at Police Training School Mansehra, do hereby undertake/solemnly affirm that the contents of fore-going petition are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this honourable court

Dated :05.09.2024

**KOSAR BIBI  
(DEPONENT)**

Annex P -

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**BEFORE THE PESHAWAR HIGH COURT**  
**BENCH ABBOTTABAD**

W.P. No. 977A of 2024

Ali Asghar FC No. 148 son of Khasta Mir,  
Caste Tanoli, resident of Phulra, Tehsil  
And District Mansehra ..... **Petitioner**

**Versus**

- 1) SP Ikramullah Khan, PSP Director ✓  
Police Training School, Mansehra
- 2) Zahid Shah CLI, Police Training  
School, Mansehra
- 3) Qaim Ali Shah RI, Police Training  
School, Mansehra
- 4) Akhlaq Shah DSP Legal District  
Mansehra
- 5) Suhail Akhtar OASI, Mansehra
- 6) Raza Khan SRC Mansehra

..... **Respondents**

**WRIT PETITION UNDER ARTICLE 199**  
**OF THE CONSTITUTION OF ISLAMIC**  
**REPUBLIC OF PAKISTAN, 1973 TO THE**  
**EFFECT THAT RESPONDENTS ARE**  
**HARASSING THE PETITIONERS.**

**Respectfully Sheweth!**

- 1) That, the petitioner is serving in  
police department as F.C and posted  
in Driving License Branch Mansehra  
in the office of DPO Mansehra.
- 2) That, petitioner's wife Mst. Kousar  
Head Constable was posted as Law  
Instructor in Police Training School,

Att. Steel  
A.T.C  
[Signature]

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Mansehra where she served for about 5 years and 9 months.

- 3) That, the petitioner's wife Mst. Kousar Head Constable applied for maternity leave, but she was refused maternity leave on the ground that she had availed such leave thrice and the same could be granted by the DPO of parent district.

**(Copies of application and medical record are attached as Annexure "A")**

- 4) That, petitioner's wife was repatriated/transferred/posted to the office of DPO Mansehra. The petitioner's wife namely Mst. Kousar Bibi filed a writ petition before this Honourable Court bearing No. 627-A/2024 which is still pending before this Honourable Court.

**(Copy of writ petition is annexed as Annexure "B").**

- 5) That, the petitioner submitted an application to I.G. Police KP Peshawar for the withdrawal of transfer order on 29.05.2024 & 30.08.2024 and an inquiry was marked to DPO Abbottabad against Director and the said application is now marked to DPO Mansehra who marked the same to SP City, Mansehra.

**(Copies of the applications are annexed as Annexure "C")**

- (76) (87) (91)
- 6) That, the petitioner's wife sent a notice through her counsel Khanzada Abdul Wahab Khan for providing various documents/information but the Director Police Training School did not provide a single document to her (petitioner's wife).

**(Copies of the notice and applications are annexed as Annexure "D")**

- 7) That, DPO Abbottabad to whom the inquiry against Director, Police Training was assigned called the petitioner, but the petitioner replied that without the order of DPO Mansehra he cannot come and the petitioner has no concern with the said inquiry, as the inquiry was going on against the Director on the application of petitioner's wife so the petitioner was harassed so that he could compel his wife to withdraw the application which is the foundation of inquiry against the Director and to also withdraw the writ petition pending before this Honourable Court; that a letter has been issued to inform the husband of Mst. Kousar Bibi but all these have been done in order to insult/disgrace the petitioner, although the petitioner informed that he is



already in the knowledge of. Lastly the FIA department through Mohsin and Umer also contacted the petitioner on mobile and pressurizing him to appear before them.

(Copies of relevant record for harassment are attached as Annexure "E")

That, the petitioner seeks the indulgence of this Honourable Court inter-alia on the following amongst other grounds: -

**GROUND:** -

- a) That, there is no any complaint nor any allegations nor inquiry is being initiated by the petitioner and his association or calling by the DPO Abbottabad is absolutely not justified.
- b) That, petitioner's wife was submitted an application to Inspector General of Police and also sent a legal notice to respondents but instead the petitioner is being harassed by respondents by various means.
- c) That, the object of harassing the petitioner is to compel him to agree for the withdrawal of writ petition and the inquiry against Director.

87 93

- d) That, it is fundamental rights of the petitioner not to be harassed by the Director, but despite he is bent to call the petitioner on one or other pretext.
- e) That, the respondents Nos. 4, 5 & 6 are performing their duties on their position more than 20 years and they have personal grudge with the petitioner.

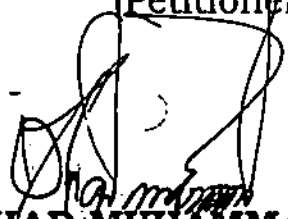
(Copy of relevant record is attached as Annexure "F")

It is, therefore, requested that on acceptance of the writ petition the respondents may kindly be directed not to harass the petitioner.

Dated /09/2024

Ali Aaghar  
(Petitioner)

Through: -

  
**SHAD MUHAMMAD KHAN**  
Advocate Supreme Court of  
Pakistan (Mansehra)

**VERIFICATION**

I ALI ASGHAR SON OF KHASTA MIR, CASTE TANOLI, RESIDENT OF PHULRA, TEHSIL AND DISTRICT MANSEHRA DO HEREBY THAT THE CONTENTS OF FORE-GOING WRIT PETITION ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE COURT.

  
ALI ASGHAR  
(DEPONENT)

(6) (96)

**BEFORE THE PESHAWAR HIGH COURT**  
**BENCH ABBOTTABAD**

Ali Asghar.....Petitioner

**Versus**

SP Ikramullah Khan, PSP Director Police  
Training School, Mansehra and  
others.....Respondents

**WRIT PETITION**

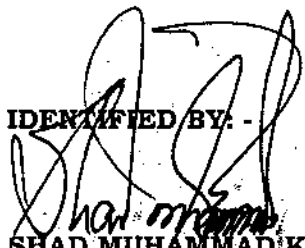
**AFFIDAVIT**

I ALI ASGHAR SON OF KHASTA MIR, CASTE TANOLI,  
RESIDENT OF PHULRA, TEHSIL AND DISTRICT  
MANSEHRA DO HEREBY SOLEMNLY AFFIRM AND  
DEDCLARE ON OATH THAT NO SUCH SUBJECT  
MATTER WRIT PETITION ARE TRUE AND CORRECT  
TO THE BEST OF MY KNOWLEDGE AND BELIEF AND  
NOTHING HAS BEEN CONCEALED OR SUPPRESSED  
FROM THIS HONOURABLE COURT.



ALI ASGHAR  
(DEPONENT)

IDENTIFIED BY: -



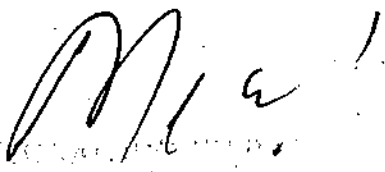
SHAD MUHAMMAD KHAN  
ADVOCATE SUPREME COURT OF  
PAKISTAN (MANSEHRA)

13503-1850775-1

4802/209

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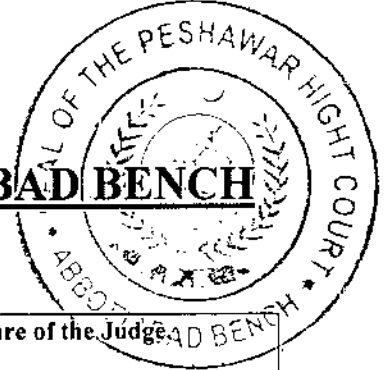
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Sep 24  
Mansehra Dist  
Mansehra



11/9  
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**PESHAWAR HIGH COURT, ABBOTTABAD BENCH**



**ORDER SHEET**

Date of Order of Proceedings	Order or other Proceedings with the Signature of the Judge
1	2
24.09.2024	<p><b>WP No. 977- A/2024</b></p> <p><b>Present:</b> Mr. Shad Muhammad Khan, Advocate, along with petitioner.</p> <p>Sardar Basharat, learned Additional Advocate General, for the State.</p> <p>***</p> <p><b><u>MUHAMMAD IJAZ KHAN, J.</u></b> Through the instant writ petition, the petitioner has prayed as under:</p> <p><b>It is, therefore, requested that on acceptance of the writ petition the respondents may kindly be directed not to harass the petitioner.</b></p> <p>2. During the course of arguments, learned counsel for the petitioner states that since an inquiry against the wife of the petitioner is pending in which the present petitioner, being husband of Mst. Kousar, is unnecessarily called by the respondents and they also harass him. Learned AAG present in the Court takes the notice of instant petition and states that he will ensure that the petitioner shall not be harassed and he is to be treated in accordance with law.</p> <p>3. Accordingly, the instant writ petition is disposed of with the direction to respondents not to harass the petitioner and treat him in accordance with law.</p> <p><b>JUDGE</b></p> <p><b>JUDGE</b></p>

Certified to be True Copy  
EXAMINER  
27 SEP 2024  
Peshawar High Court Add. Bench  
Authorized Under Sec. 75 Evid. Ordns.

Tahir Sakran

(DB) Mr. Justice Muhammad Ijaz Khan and Mr. Justice Muhammad Faheem Wali

400/60/ku	March
400/60/ku	April
—/—/—	May
—/—/—	June
—/—/—	July
—/—/—	Aug.
—/—/—	Sept.
400/60/ku	Oct.
—/—/—	Nov.
—/—/—	Dec.

# وکالت نامہ

96

بعدالت جناب KPK سروس ٹریبیونل پشاور

انسپیکٹر جنرل آف پولیس وغیرہ

نام

کوٹلی بی

سروس اپیل

اپیلانٹ

باعث تحریر آنکھ!

منجانب:

جنید انور خان ایڈووکیٹ سپریم کورٹ آف پاکستان اینڈ سید آصف شاہ ایڈووکیٹ ہائی کورٹ  
رحاب رخسار ایڈووکیٹ

اندیس مقدمہ عنوان بالا اپنی طرف سے برائے بیرونی وجوہات ہی بمقام سروس ٹریبیونل پشاور

کو بیرون شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رُود و عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام پکھری کے آگے یا پیچھے ساعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی، اپیل گمرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپردِ ناشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا فیصلہ ڈگری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی طلبہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و گمرانی کسی دوسرے وکیل یا پیر سٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پرداختہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ من لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 10.10.2024

کوٹلی بی ہیڈ کانسٹیبل BPS-09 بیلٹ نمبر 647، متعینہ PTS نمبرہ..... اپیلانٹ

Attested & Accepted  
JUNAID ANWAR KHAN &  
ADVOCATE SUPREME COURT

Attested & Accepted  
SYED ASIF SHAH  
ADVOCATE HIGH COURT

Rujab Rukhsar Advocate