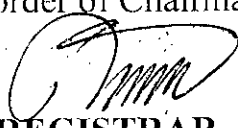


FORM OF ORDER SHEET

Court of _____

Appeal No. 579/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/04/2024	<p>The appeal of Mr. Izran Ullah received today by registered post through Sheikh Iftikharul Haq Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on . Counsel for the appellant has been informed telephonically.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWASERVICE TRIBUNAL CAMP COURT DERA
ISMAIL KHAN

Service Appeal No. 579 /2024

IzranUllah

VERSUS

Inspector General of Police and others

SERVICE APPEAL

INDEX

S.No	Particulars of the Documents	Annexure	Page
1.	Grounds of Service Appeal and affidavits	--	1-5
2.	Copy of application	A	6
3.	Copies of statement of allegations, charge sheet	B	7-8
4.	Copy of order dated 30/01/2023	C	-9-
5.	Copy of appeal	D	-10-
6.	Copy of the impugned order dated 03/11/2023	E	11-12
7.	Copies of the application and order dated 25/01/2024	F	13-16
8.	Wakalatnama	--	17

Date: 16 /04/2024

Yours Humble Appellant


Izran Khan

Through Counsel,


Sheikh Iftikharul Haq

Advocate Supreme Court

Cell#0345-9785920

BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWASERVICE TRIBUNAL CAMP COURT DERA
ISMAIL KHAN

Service Appeal No: 579 /2024

IzranUllah son of Sahib Jan caste Marwat r/o village Andari
Tehsil & District Tank. Ex-Constable Belt No. 128 District Police
Tank. Cell#0342-8619185

Appellant

Versus

1. Provincial Police Officer (IGP), Khyber Pakhtunkhwa,
Peshawar.
2. Regional Police Officer, Dera Ismail Khan Region.
3. District Police Officer District Tank.

.....**Respondents**

SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICES
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER
OB#46 DATED 30/01/2023 VIDE WHICH THE APPELLANT IS
REMOVED FROM SERVICE WITHOUT ANY LAWFUL
JUSTIFICATION AS WELL AS AGAINST THE ORDER OF
APPELLATE AUTHORITY (RESPONDENT#2) OB-8739 DATED
03/11/2023 VIDE WHICH THE DEPARTMENT APPEAL OF
APPELLANT WAS REJECTED AS WELL AS AGAINST THE
ORDER#128/24 DATED 25/01/2024 OF THE LEARNED
RESPONDENT#1 VIDE WHICH THE REVISION PETITION OF
APPELLANT WAS FILED/REJECTED .

PRAYER

On acceptance of the instant Service Appeal the impugned order dated 30/01/2023 issued by the DPO Tank and also against the order of the appellate authority (respondent#2) dated 03/11/2023 and order dated 25/01/2024 of the learned revisional authority (respondent#1) may please be

2

set aside and the appellant may kindly be reinstated into service with all back benefits.

Respectfully Sheweth:-

The Appellant most respectfully submits as under:-

BRIEF FACTS:

1. That the appellant was appointed as Constable in the incumbency of respondents/authority on 05/07/2021 in District Police Tank after observing all the legal and code of fulfillments and was allotted Belt No. 128.
2. That the appellant performed his duties to the entire satisfaction of his superiors.
3. That during the pendency of service the appellant submitted an application for study leave without pay which was forwarded. Copy of application is annexed as **Annexure-A**.
4. That it is pertinent to mention here that the respondents/authority issued statement of allegations and charge sheet with the allegations that the appellant remained absent without any leave or reasonable cause w.e.f 01/10/2022 till date i.e. 28/10/2022, which were properly replied by the appellant. Thereafter the respondents/authority ensured the appellant that his leave application will be accepted being genuine. Copies of statement of allegations, charge sheet are annexed as **Annexure-B**.
5. That at the back of the appellant the respondents/authority issued the order No. 635 dated 30/01/2023 of removal from service vide OB No. 110 dated 30/01/2023. Copy of order dated 30/01/2023 is annexed as **Annexure-C**.
6. That as stated above the appellant was not in the knowledge of aforementioned impugned order, the appellant came into knowledge of the impugned order on 19/09/2023 and on the same date i.e. 19/09/2023 submitted an appeal. Copy of appeal is annexed as **Annexure-D**.
7. That the appellate authority rejected the appeal of appellant vide impugned order OB-8739 Dated 03/11/2023. Copy of the

impugned order dated 03/11/2023 is annexed as **Annexure- E**, which was received through Application #14

- 8. That feeling aggrieved by both the impugned orders mentioned above, the appellant filed a revision petition before the respondent#1 but the same was also rejected vide order No. 128 dated 25/01/2024 but the same order was not issued to the appellant and thus the appellant submitted an application for provision of order dated 25/01/2024, the application was properly allowed on the same date i.e. 02/04/2024 and the order was provided on the same date i.e. 02/04/2024. Copies of the application and order dated 25/01/2024 are annexed as **Annexure-F**.
- 9. That the appellant, being aggrieved from the afore-mentioned impugned orders, the instant service appeal is being filed, inter alia, on the following grounds.

GROUND:

- a. That the impugned order dated 30/01/2023 issued by the respondent#3 as well as the subsequent impugned orders of appellate and revisional authorities are against law, facts, natural justice, void ab initio, hence, liable to be set aside.
- b. That the impugned orders are against law, principle of service laws, policy, rules, regulations and also against the Police Rules, 1934 as amended in 2014 and is also not in the commence of EASTA Code.
- c. That no proper inquiry whatsoever was conducted by the respondents while issuing the impugned orders and thus, the impugned order are liable to be set aside being issued in violation of law.
- d. That during the whole proceedings against the appellant the mandate of police rules and ESTA code was violated. Moreover, the respondents/authority while passing the impugned removal order did not follow the police rules,

1975 as amended in 2014; nor followed the E&D Rules 2011.

- e. That no show-cause notice, final show cause notice were served upon the appellant and thus the impugned order has been passed in violation of law.
- f. That no opportunity of personal hearing had been given to the appellant and on this sole ground the impugned orders are not sustainable in the eye of law.
- g. That the whole proceedings (although not admitted) whatsoever has been done by the respondents/authority in slipshod manner expeditiously.
- h. That the appellant is a poor fellow having family with children and there is no earning hand except the service of appellant, hence, the service of appellant is liable to be reinstated along with all back benefits.
- i. That counsel for appellant may kindly be allowed to raise additional grounds at the time of arguments.

It is therefore, humbly prayed that on acceptance of the instant Service Appeal the impugned order dated 30/01/2023 issued by the DPO Tank and also against the order of the appellate authority (respondent#2) dated 03/11/2023 and order dated 25/01/2024 of the learned revisional authority (respondent#1) may please be set aside and the appellant may kindly be reinstated into service with all back benefits.

Date: ____/04/2024

Yours Humble Appellant

(Signature)
Izran Khan
 Through Counsel,
(Signature)

Sh. Afkhar ul Haq
 A.S.C. 2020

5
Sheikh IftikharulHaq
Advocate Supreme Court
Cell#0345-9785920

BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT DERA
ISMAIL KHAN

Service Appeal No. _____/2024

IzranUllah

VERSUS

Inspector General of Police and others

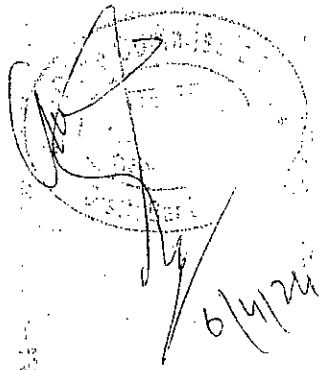
SERVICE APPEAL

AFFIDAVIT

I, **IzranUllah** son of Sahib Jan caste Marwat r/o village Andari Tehsil & District Tank, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

Dated: 16 /04/2024


DEPONENT



Ann - 'A' 6

بنا دیا گیا ہے۔
ان کی بنیاد پر 2021ء کی سالانہ رپورٹ میں 18 کروڑ روپے کی رقم فراہم کی گئی ہے۔
ایس۔ اے۔ (Worth Put) ہے۔
یہ رقم سالانہ بجٹ میں منظور ہوگی اور یہ ماسٹری پلان کے تحت فراہم کی گئی ہے۔

بین الاقوامی
01/07/2022

پتہ

ارض
سالانہ بجٹ میں منظور ہوگی اور یہ ماسٹری پلان کے تحت فراہم کی گئی ہے۔

Sis
Lad...
01/07/2022

بنا دیا گیا ہے۔
سربراہ
01/07/2022

ذرا سیلی
01/07/2022

01/07/2022
By Superintendent
01/07/2022

01/07/2022

Attached to be
forwarded
to
01/07/2022


Forwarded
01/07/2022

STATEMENT OF ALLEGATION

7

According to DD Report No. 11 dated 01.10.2022, You Constable Izran Ullah No. 128 posted at PS / Ping, Tank have remained absent without any leave or reasonable cause w.e from 01.10.2022 to till date, which shows negligence & lack of interest in discharge of your official duties and amounts to gross misconduct on your part. Thus liable to be taken under consideration under Khyber Pakhtunkhwa Police Rules 1975 amended 2014.

Hence the statement of allegation.

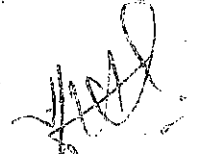

(WAQAR AHMED)
District Police Officer,
Tank

No. 3879-80/PA, Dated Tank the 28/10/2022.

Copy to the:-

1. DSP/Handola, Tank for initiating proper departmental proceeding against the defaulter under Provision of KPK Police Rules 1975 and submit findings report within stipulated period as per prescribed rules.

2. Constable Izran Ullah No. 128 with the direction to appear before the Inquiry Officer on the date, time and venue fixed by the Inquiry Officer for the purpose of enquiry proceedings.


(WAQAR AHMED)
District Police Officer,
Tank

Attached to be true
copy



CHARGE SHEET


WHEREAS, I, am satisfied that a formal enquiry contemplated under Khyber Pakhtunkhwa Police Rules 1975 with amendment 2014 is necessary and expedient.

AND WHEREAS, I am of the view that the allegation(s) if established would call for a Major Penalty including Dismissal From Service as defined in Rules (4) (i) (b) of the aforesaid Rules.

AND THEREFORE, as required by Police Rules 6 (a) of the aforesaid Rules, I Mr. WAQAR AHMED, District Police Officer Tank being a competent authority hereby charge sheeted Constable Izran Ullah No. 128 did on the basis of statement of allegation attached to this Charge Sheet.

AND hereby direct you further under rule 6(b) of the said rules to put in written defense within seven (07) days of receipt of this Charge Sheet as to why the proposed action should not be taken against you and also state that the same time whether you wish to heard in person or otherwise.

In case your reply is not received within the prescribed period, without sufficient cause, it would be presumed that you have not defense to offer and ex-parte action proceedings will be initiated against you.


(WAQAR AHMED)
District Police Officer,
Tank

Attached to be true
copy





OFFICE OF
DISTRICT POLICE OFFICER,
TANK

Tel: 0963-510257, Fax: 511257

No. 635/PA Dated Tank the 30/01 2023

ORDER

This order will dispose of departmental proceedings initiated against Constable Izran Ullah No.128 (hereinafter called accused official) under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014), on the following allegations that:

- i. According to DD report No.11 dated 01.10.2022 of PS Daulat Khan Korna (Ping), he while posted at PS DDK/Ping, remained absent without any leave or reasonable cause w.e.f. 01.10.2022 to 27.11.2022, which shows negligence & lack of interest in discharge of his official duties and amounts gross misconduct on his part, vide this office charge sheet No.3879/PA dated 28.10.2022.
 - ii. According to the DD report No.13 dated 27.11.2022 of Police Lines Tank, remained absent w.e.f. 27.11.2022 till date without any prior approval / permission from the competent authority. This shows his negligence & lack of interest in the discharge of official duties which is a gross misconduct on his part, vide this office charge sheet No.4719/PA dated 19.12.2022.
2. For the above, serious/professional misconduct of the accused official, charge sheet alongwith statement of allegations were served upon the defaulter police constable. An enquiry was conducted into the matter through Mr. Said Marjan DSP Jandola, was appointed as enquiry officer to scrutinize the conduct vide charge sheet No.3879/PA dated 28.10.2022 stated above (i). The Enquiry Officer established his report, in which, he stated that he was absent w.e.f. 01.10.2022 to 27.11.2022 without any leave or permission and found guilty of the charges levelled against him as well as not taking interest in official duty.
3. Likewise, another enquiry was conducted by Mr. Inam Ullah DSP HQr Tank stated above (ii) vide this office charge sheet No.4719/PA dated 19.12.2022 and submit his findings report in which he stated that Constable Izranullah who is still absent since 27.11.2022 owing to BS degree and that his one semester is also remaining due to which he is absent and so far absent. Enquiry Officer further stated that appropriate order may be issued in this regard.
4. Keeping in view of findings and recommendations of the Enquiry Officers of both the enquiry stated in Para 1(i)(ii) above, the undersigned came to the conclusion that the charges levelled against the defaulter police constable has been established beyond any shadow of doubt.
5. His oral and written pretexts of absence from duty without approval of the competent authority were found unconvincing.
6. He was summoned in Orderly Room to provide lawful opportunity of hearing but the officer concerned not appears in Orderly Room without any cogent reason.
7. Keeping in view, I, **WAQAR AHMED, DISTRICT POLICE OFFICER, TANK**, in exercise of the powers conferred upon me under section 4(b) clause (iii) of the Khyber Pakhtunkhwa Police Rules 1975 (amended 2014), do not take a lenient view, owing to the fact that absence from lawful duty without approval from the competent authority, hereby awarded a Major Punishment of "Removal from service" from the date of absence 01.10.2022 to the defaulter police Constable Izran Ullah No.128.

(WAQAR AHMED)
District Police Officer,
Tank

ENDST. NO. & DATE EVEN.

Copy to SRC/OHC/Pay Officer for further necessary action at your end.

Attested to be true copy
Gey

OB No 110
of 30.1.23

Gey

بخدمت جناب RPO صاحب ڈروہ اسماعیل خان

رحم اہل براد (بجال کرانے سروس)

جناب عالی!

گزارش بحضور انور حیکہ فدوی سال 2021 کا محکمہ پولیس ٹانک میں بھرتی ہوا تھا اور سال 2023 کو بسلسلہ محکمانہ
مکواتری بحوالہ آرڈر نمبر PA/635 مورخہ 30.01.023 کو جناب DPO صاحب ٹانک نے بوجہ غیر حاضری
Removal of service آرڈر جاری کیا ہے (آرڈر کاپی ہمراہ لف ہے)۔

لہذا بذریعہ درخواست استدعا کی جاتی ہے کہ غربت اور مہنگائی کے اس دور میں فدوی کے غربت اور لاچارگی کو
مد نظر رکھتے ہوئے عین ماتحت پروری کے تحت فدوی کو دوبارہ سروس پر بحال کیا جاوے۔ ساکن تاحیات دعا گو رہے

عین نوازش ہوگی

مورخہ 19.09.023

ارض

کنشیل حفزان اللہ 128 EX

Attested to be true
copy

Copy

Copy

گورنمنٹ جنرل ڈپو DPPO 188

جناب عالی!

گزارش کی حالتی ہے کہ سائل کو 2023 DI 38 کو قلمبند کر کے
 جناب DPPO ٹانک نے بحوبہ غیر دستوری *Dismissed from service*
 کیا تھا۔ جس پر سائل نے جناب RPO صاحب کو رقم ارسال
 کیا تھا جو کہ *Rejected* ہوا ہے۔ سائل کی اس گزارش ہے کہ اس
 لیٹر کی نقل کاپی دے کر کاغذ متاثر فرمایا جائے
 سائل تاحیات دعا گو رہے گا

عین گزارش ہوگی

مورخہ 03.01.2024

العارض

Ex کانسیبل عضوان اللہ 188

(Signature)

Allowed
 District Police Officer
 Tank

کاپی وصول شدہ
(Signature)

Attached to be true copy

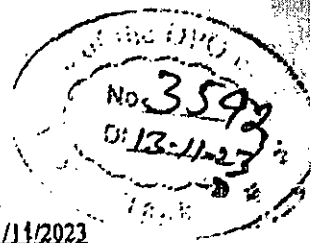
(Signature)

(Signature)



OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

0966-9280291 Fax # 9280290
dated D.I.Khan the



No. 8738 /ES

03/11/2023

ORDER

1. This order disposes off departmental appeal filed by Ex-Constable Izran Ullah No 128 of District Police Tank, against the order of Major Punishment of (Removal from Service) passed by the DPO Tank vide his office OB No.110 dated 30.01.2023 on the following allegations.

2. "According to DD No. 11 dated 01.10.2022 of PS Daulat Korna (ping), he remained absented from lawful duty without any leave or reasonable cause w.e.f. 01.10.2022 to 27.11.2022, which shows negligence & lack of interest in discharge of his official duties and amounts gross misconduct on his part vide his office charge sheet No. 3879/PA dated 28.10.2022".

"According to DD No. 13 dated 27.11.2022 of police line Tank, he remained absent from lawful duty w.e.f. 27.11.2022 to till date (Date of Dismissal) without any leave or permission from the high ups".

ii. DPO Tank served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Said Marjan DSP Jandola who in his finding report, he stated that he was absent with effect from 01.10.2022 to 27.11.2022 without any leave or permission and found guilty charged levelled against as well as not taking interest in official duty.


iii. Another inquiry was conducted by Mr. Inam Ullah DSP HQrs Tank in which he stated that, the defaulter constable is absent since 27.11.2022, owing to the student of BS and one semester is also remaining due to which he is absent and inquiry officer recommended for appropriate order.

3 Hence, the appellant was awarded Major Punishment of "Removal from Service" by the DPO Tank vide his office OB No.110 dated 30.01.2023.

4 Perusal of the service record of the applicant and comments received from DPO Tank the instant appeal is time barred.

3. Keeping in view the above, I, **NASIR MEHMOOD SATTI, PSP**, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (a), of the Police Rules 1975, do not intend to take a lenient view, therefore **REJECT** his appeal being time barred and uphold the order of Major Punishment of (Removal from Service) passed by District Police Officer Tank vide his OB No. 110 dated 30.01.2023, with immediate effect.

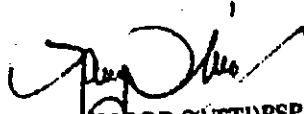
5 Order Announced


(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan
20/10


No. 8739 /ES,

Copy of above is sent to the DPO Tank with reference to his office letter No. 2617 dated 05.10.2023, (Encl: Service Roll & Fauji Missal).


~~OB/SRC/OAS~~
~~for name~~


(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan
24/10

District Police Officer
Tank
12/11

Attached to be true copy


OB No 1113
01-13-11-23

Attached to be true copy


بخدمت جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ پشاور

نگرانی برخلاف حکم نمبر 8738 مورخہ 03/11/2023 صدرہ ازاں ریجنل پولیس آفیسر ڈیرہ

اسماعیل خان جس کی رو سے من سائل کی اپیل برخلاف حکم مورخہ OB#635 مورخہ

30/01/2023 خارج فرمائی گئی۔ جس کی رو سے من اپیلانٹ کو ملازمت سے Remove کیا

گیا۔

جناب عالی! اپیلانٹ حسب ذیل عرض رساں ہے۔

۱۔ یہ کہ من سائل مورخہ 05/07/2021 کو محکمہ پولیس ٹانک میں بروئے بیلٹ نمبر 128 بھرتی ہوا تھا اور بعد از بھرتی پوری ایمانداری و جانفشانی کیساتھ اپنی ڈیوٹی سرانجام دی اور افسران بالا کو شکایت کا کوئی موقع نہیں دیا۔ اس نسبت اپیلانٹ کا سروس ریکارڈ واضح ہے۔

۲۔ یہ کہ اپیلانٹ کے والدین ضعیف العمر ہیں اور زیر علاج ہیں من اپیلانٹ اپنے والدین کی تیمارداری میں دن رات مصروف رہا کیونکہ ماں کے قدموں میں جنت ہوتی ہے اور والد بھی جنت کا دروازہ ہے۔ مذید یہ کہ من اپیلانٹ والدین کے اصرار پر B.S کیمسٹری کا امتحان دے رہا تھا۔

۳۔ یہ کہ دوران سروس من اپیلانٹ کو Statment of allegation اور چارج شیٹ دی گئی جس کا باقاعدہ طور پر من اپیلانٹ نے جواب دیا۔ یہ واضح کرتا چلوں کہ اپیلانٹ نے چھٹی کی درخواست بھی جمع کرائی تھی جو کہ باقاعدہ طور پر پراسیس بھی ہوئی تھی۔ اور اندریں حالات میں اپیلانٹ کو محکمہ پولیس سے تسلی ہوئی کہ اپیلانٹ کا معاملہ جینوئن ہے اور چھٹی بحال ہو جائے گی لیکن بروئے حکم نمبر 635 مورخہ 30/01/2023 کو سروس سے Remove کر دیا گیا جس کا علم مورخہ 19/09/2023 کو ہوا اور اسی دن یعنی 19/09/2023 کو من اپیلانٹ نے ریجنل پولیس آفیسر ڈیرہ اسماعیل خان کو حکمانہ اپیل ارسال کی اور جناب RPO صاحب نے بغیر شنوائی کے مورخہ 03/11/2023 کو من اپیلانٹ کی اپیل بروئے حکم نمبر 8738 خارج فرمائی۔ جو کہ اپیلانٹ کے علم میں نہیں لایا گیا البتہ من اپیلانٹ نے مورخہ 03/01/2024 کو DPO ٹانک کو درخواست گزاری کہ من اپیلانٹ کو حکم مورخہ 03/11/2023 کی نقل فراہم کی جائیں۔ جو کہ من اپیلانٹ کو مورخہ 03/01/2024 کو حکم مذکورہ بالا کی نقل فراہم کی گئی۔ نقول لف ہیں۔

۴۔ یہ کہ من سائل ایک غریب گھرانے کا چشم و چراغ ہے بوڑھے بیمار والدین کی تیمارداری اور علاج معالجہ بھی

Attached to be have copy

(Signature)

اپیلانٹ کی ذمہ داری ہے اور اپیلانٹ کے پاس کوئی دیگر ذریعہ معاش بھی نہیں ہے علاوہ ازیں اپیلانٹ نے اپنے والدین کے اصرار پر BS کیمسٹری کی ڈگری بھی حاصل کر لی ہے ان حالات کے پیش نظر اپیلانٹ کو ملازمت پر بحال فرمانا عین قرین انصاف ہے۔

لہذا استدعا ہے کہ بمختصری نگرانی ہذا اپیلانٹ کو ذاتی شنوائی کا موقع دیا جائے، حکم ہائے متدعویہ کو منسوخ فرمایا جائے اور اپیلانٹ کو ملازمت پر بحال فرما کر اپیلانٹ کی دادرسی فرمائی جائے۔

مورخہ 16/01/2024

عضران اللہ ولد صاحب جان قوم مروت سکنہ گاؤں اندری ضلع ٹانک

سابقہ کانسٹیبل بیلٹ نمبر 128 ڈسٹرکٹ پولیس ٹانک موبائل نمبر 0342-8619185

(Signature)

Attested to be true copy

(Signature)

خدمت جناب DPO صاحب ٹانک

جناب عالی!

کنزیشن لکھائی ہے سائل عظیم ان اللہ 128

سال 2021 کا کمر لے شدہ تھا۔ بوجہ

غیر حاضری پر خامت لیا جا چکا ہے۔ جس

پر سائل نے جناب IGP صاحب کو رقم

اپیل لیا تھا جو کہ Reject ہوا ہے۔

سائل کی استدعا ہے کہ اس اپیل کی (Rejection)

کی نقل کالی سائل کو دی جائے۔ سائل تاحیات

دعاگو رہے گا۔

عین نوآرٹیشن ہوگی

تاریخ 02-04-2024

العارض

Ex کانٹریبل عظیم ان اللہ 128

(District Police Tank)

(I) 7

Allowed

Appeal Rejection Copy Received

Pat-721

02/4/2024

Q

- Attached to be true copy

(I) 7



469
07-2-24

16

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. 128 / 24, dated Peshawar the 25 / 01 / 2024

To: The Regional Police Officer,
Dera Ismail Khan.

ESTABLISHMENT BRANCH
By No. 538 / 24
Dated. 22 / 01 / 2024
RPO OFFICE DIXHAN

Subject: REVISION PETITION.

The Competent Authority has examined and filed the application submitted by complainant Izzat Ullah No. 128 of District Tank Police, against the punishment of dismissal from the service awarded by DPO Tank vide OIR No. 110, dated 30/01/2023, being badly timed.

The application is being informed accordingly.

AD-532/15
22-01-24
DPO/Tank

[Signature]
25/1/24
CAESAR LANSI
Registrar

To inform the applicant.

For Inspector General of Police
Khyber Pakhtunkhwa Peshawar.

Regional Police Officer
Dera Ismail Khan

[Signature]

[Signature]
[Signature]
Tank

Attached to be
true copy
to
[Signature]

وکالت نامہ

MR. IFTIKHAR ULLAH
 Advocate
 Supreme Court of Pakistan (ASC)
 Date of issue: 18-08-2022
 (Under Article 143 of the Constitution of Pakistan)



(Mr. Muhammad Masood Chishti)
 Chairman Executive Committee

کোর্ٹ فیس
 قیمت ایک سو روپیہ

بعدالت جناب **فہرین شاہ** سروسز پرائیویٹ لمیٹڈ
 متقابل **ایمان**
 حضوران شاہ **ایمان** سروسز پرائیویٹ لمیٹڈ
 درجن یا جرم
 تیل دعویٰ یا جرم

باعث تحریر آنکہ

مقررہ پیر متذکرہ بالا انصوان میں اپنی طرف واسطہ دہی وجوہ اس لئے برائے پیشی یا تصفیہ مقدمہ بمقام **D. J. Khan** کیلئے
شیخ مختار احمد اعجازی سروسز پرائیویٹ لمیٹڈ
 کہ میں ہر پیشی پر خود بخود اپنے اختیار عاقل روبرو عدالت حاضر ہوتا ہوں گا۔ اور ہر وقت تیار رہے جانے مقدمہ وکیل صاحب
 کو فکرا اور دیگر حاضر عدالت کروں گا، اگر پیشی پر ظہیر حاضر ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوفہ
 کو اس میں طرح ذمہ داریوں کے، نیز وکیل صاحب موصوفہ صاحب مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے
 ذمہ داریوں کے۔ نیز وکیل صاحب موصوفہ صاحب مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ داریوں
 کے۔ اور مقدمہ پکھری کے علاوہ اور جگہ ساعت دوسرے بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر پتھر کو کوئی نقصان پہنچے تو اس کے ذمہ
 داریوں کے واسطے کسی معاوضہ کے ادا کرنے یا عطا نہ ہوں گے۔ کہ جس موصوفہ ذمہ داریوں کے۔ مجھ کو کل ساختہ پروا خط صاحب موصوفہ مکمل کرو
 اور خود تیار قبول ہوگا۔ اور صاحب موصوفہ کو عرضی ہوگی، یا جرم کوئی یا اور خواست اجراء سے ڈگری و نظر ثانی اپیل گمرانی اور جرم درخواست پر دستخط و تصدیق کرنے کا
 حکم اختیار ہوگا۔ اور کسی حکم یا ڈگری کرنے اور جرم کا روپیہ وصول کرنے اور سیدہ دینے اور واپس کرنے اور جرم کے بیان دینے اور اس پر ثالثی یا رضی نامہ فیصلہ بر
 عاقل کرنے، و تہاں کوئی کا کسی اختیار ہوگا۔ اور بصورت مقررہ تاریخ پیشی مقدمہ مذکورہ پیر ان از پکھری صدر بیروی مقدمہ مذکورہ نظر ثانی و اپیل گمرانی و پیر آمدگی
 کے لئے پیشی و تہاں کا طرف یا اور خواست حکم انتظامی یا قریبی یا رازداری آئل از فیصلہ اجراء سے ڈگری ہی صاحب موصوفہ کو بشرط ادا سنگلی علیحدہ عطا نہ ہونے کی اختیار ہوگا
 اور نام برائت پر وافتہ صاحب موصوفہ مکمل کردہ ذات خود منظور دانی ہوگا۔ اور بصورت ضرورت صاحب موصوفہ کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا ایک کی جزو
 و تہاں یا بصورت ذمہ داریوں و اسٹانڈرڈ اپیل یا گمرانی یا دیگر عاقلانہ طور پر ذمہ داریوں کے وکیل یا پھر پھر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور اپنے مشیر قانون کو
 ہمراہ لائیں وہی اور ویسے اختیارات حاصل ہوں گے، جبکہ صاحب موصوفہ کو حاصل ہیں، اور وہ راجن مقدمہ میں جو کچھ ہر جائز التزام چاہے گا، وہ صاحب
 موصوفہ کو ہونا چاہئے، صاحب موصوفہ کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروا کر صاحب موصوفہ کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور اسکی
 نتیجہ برائے ہر حال کسی قسم کا صاحب موصوفہ کے برخلاف نہیں ہوگا۔

2024 06 06

مضمون وکالت نامہ اس لئے لیا ہے۔ اور اسکی اجراء کچھ لیا ہے اور منظور ہے۔

حضوران شاہ ایمان

Attested & Accepted

Sh. Afkhar ul Farq
 A-S-C

پیشی