

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No 511/2022

Yaqoob Ur Rehman, Constable Belt No 773, Police force Karak

VERSUS

The Provincial Police officer KPK Peshawar and others

..... Respondents

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Dated 04/11/2024

Yaqoob
Petitioner

Through

Rozda Khan
Rozda Khan
Advocate, High Court
Peshawar

(1)

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APPLICATION FOR AMENDMENT OF APPEAL.

Khyber Pakhtunkhwa
Service Tribunal

Respectfully Sheweth:

Diary No. 17865

Dated 04/11/24

The petitioner respectfully submit as under;

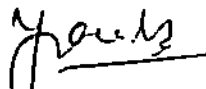
- 1- That the above noted Service appeal is pending adjudication before this Hon'ble Tribunal which is fixed for 05.11.2024.
- 2- That the applicant / appellant was filed the above titled service appeal for promotion.
- 3- That at the time of filing the above titled service appeal the impugned promotion order dated 15.04.2021 was not challenged in prayer of service appeal advertently. (Copy of impugned promotion order dated 15.04.2021 is attached as annexure-A).

(2)


- 4- That the applicant / petitioner wants to amend the above mentioned service appeal to the extent of challenged / mention of impugned promotion order dated 15.04.2021.
- 5- That there is no legal bar for acceptance of the instant application.

It is, therefore, respectfully prayed that on acceptance of this application, the petitioner may very graciously be allowed to amend the service appeal to the extent to challenge / mentioned the impugned promotion order dated 15.04.2021.

Dated 04/11/2024


Petitioner

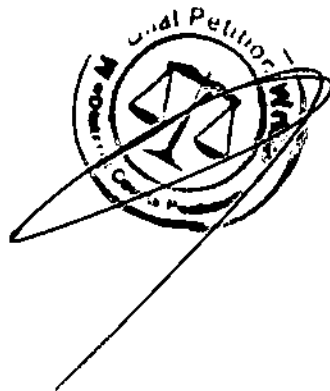
Through


Rozeeda Khan
Advocate, High Court
Peshawar

Affidavit

I, Yaqoob Ur Rehman, Constable Belt No 773, Police force Karak do hereby solemnly affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT



'A'

(3)

ORDER

In compliance of the WIRPO Kohat Region Kohat letter No. 3892-94/EC dated 24.03.2021 and on the recommendation of the District Departmental Promotion Committee (DPC) held on 08.04.2021 in the office of the undersigned. The following HCs as on acting charge basis at serial No. 01-13 are hereby regularized as Regular Head Constables against the existing vacancies of Head Constables in the district with immediate effect.

| S.# | Name & Rank | Description |
|-----|------------------------------|---------------|
| 1. | HC Amjad Kamal No.513/EF | Regular basis |
| 2. | HC Abdul Jabbar No.751 | Regular basis |
| 3. | HC Hazrat Ullah No.400 | Regular basis |
| 4. | Wasif Ullah No.838/LHC | Regular basis |
| 5. | Farman Ullah No.828/LHC | Regular basis |
| 6. | Amjad Ali No.505/LHC/BDU | Regular basis |
| 7. | Abid ur Rehman No.54/LHC | Regular basis |
| 8. | Najeeb Ullah No.46/LHC/EF | Regular basis |
| 9. | Muhammad Arif No.4717/LHC/EF | Regular basis |
| 10. | Umar Badshah No.690/LHC | Regular basis |
| 11. | Muhammad Jabbar No.236/LHC | Regular basis |
| 12. | Lal Rehman No. 729 | Regular basis |
| 13. | Majid Khan No. 558 | Regular basis |

While the following Constables on list "C" of this district Police mentioned at serial No. 14 to 24 are promoted to the rank of Head Constables on acting charge basis subject to conditions listed below.

1. The promotion shall be purely temporary.
2. They shall be liable for reversion to the original rank of constable at any time.
3. They shall not challenge their reversion or claim seniority as well as a benefit on the basis of adhoc/acting charge basis promotion before any forum including court.
4. The period served on adhoc/acting charge basis shall not be counting as officiating / probation period at any cost.
5. They shall execute an affidavit to the effect of above condition.

| S.# | Name & Rank | Description |
|-----|--------------------------------|---------------------|
| 14. | Mohib Ullah No.514 | Acting Charge basis |
| 15. | L/Const: Gohar Kalsoom No. 557 | Acting Charge basis |
| 16. | Muhammad Zafran No. 276 | Acting Charge basis |
| 17. | Naseeb Ullah No. 1136/CTD | Acting Charge basis |
| 18. | Hidayat Ullah No. 379/Inv | Acting Charge basis |
| 19. | Umer Zada No.611 | Acting Charge basis |
| 20. | Arif Ullah No. 188 | Acting Charge basis |
| 21. | Sajjad Iqbal No.515 | Acting Charge basis |
| 22. | Akhtar Hayat No.639 | Acting Charge basis |
| 23. | Siraj ud Din No.519 | Acting Charge basis |
| 24. | Rahieem Jan No.226 | Acting Charge basis |

O.B.No. 124
Dated 15/4/2021

District Police Officer, Kohat