

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No 512/2022

Muhamad Nawaz, LHC Belt No 832, Police force Karak

VERSUS

The Provincial Police officer KPK Peshawar and others

..... Respondents


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Dated 04/11/2024


Petitioner

Through


Roeeda Khan
Advocate, High Court
Peshawar

(1)

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No 512/2022

Diary No. 17567

Dated 04/11/24

Muhamad Nawaz, LHC Belt No 832, Police force Karak

VERSUS

The Provincial Police officer KPK Peshawar and others

..... Respondents

APPLICATION FOR AMENDMENT OF APPEAL.

Respectfully Sheweth:

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

Roeeda Khan
Advocate, High Court
Peshawar

Affidavit

I, Muhamad Nawaz, IHC Belt No 832, 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



1A

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ORDER

In compliance of the W/RPO 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 Házrat 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/LHG/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. 356	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 Zafar 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.	Akhbar Hayat No.639	Acting Charge basis
23.	Siraj ud Din No.519	Acting Charge basis
24.	Raheem Jan No.336	Acting Charge basis

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

District Police Officer, Kohat