


FORM OF ORDER SHEET

Court of _____

Appeal No. 2288/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/11/2024	<p>The appeal of Mr. Saif Ullah resubmitted today by Mr. Tiamur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 15/11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Saif Ullah received today i.e on 28.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Annexures of the appeal are not unattested.
- 4- Page no.12 of the appeal is illegible.
- 5- Three copies/sets of the appeal along with annexures i.e complete in all respect for Tribunal and one for each respondent be submitted with the appeal.

No. 988 /Inst./2024/KPST,

Dt. 28/10 /2024.

Mr. Taimur Ali Khan Adv.
High Court at Peshawar.

Amatilloh
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Respected Sir,

1- Removed

2- Removed

3- Removed

4- Removed as better copy of page-12 prepare.

5- Removed

Resubmitted after compliance

[Signature]

5/11/2024

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. 2328 /2024

Saif Ullah

VS

Police Deptt

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APPELLANT

THROUGH:



(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT

Cell No.03339390910

& 

(SHAKIR ULLAH TORANI)

ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 2388 /2024

Khyber Pakhtunkhwa
Service Tribunal

Case No. 17249
Date 28-10-24

Saif Ullah, Ex-Class-IV (Cook),
Elite Force, HQrs Peshawar.

(APPELLANT)

VERSUS

1. The Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. The Superintendent of Police, HQrs, Elite Force, Peshawar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED 02.07.2024, WHEREBY
THE APPELLANT HAS BEEN DISMISSED FROM THE
SERVICE AND AGAINST NOT TAKING ACTION ON THE
DEPARTMENTAL APPEAL OF THE APPELLANT
WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE
ORDER DATED 02.07.2024 MAY PLEASE BE SET ASIDE
AND THE APPELLANT MAY KINDLY BE REINSTATED
INTO SERVICE WITH ALL BACK AND
CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY
WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND
APPROPRIATE THAT MAY ALSO BE AWARDED IN
FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:
FACTS

1. That the appellant was appointed as Class-IV (Cook) in the respondent department in the year 2016 and since his appointment, the appellant was performing his duty with devotion and honesty, whatsoever, assigned to him and no complaint has been filed by his superiors regarding his performance.
2. That the appellant while serving in the said capacity became ill on 29.04.2024 due to which he went to Hospital namely DHQ Mardan for his treatment which is evident from medical report dated 29.04.2024 and on the next day he again went for duty and was performing duty, however on 02.05.2024 his wife became ill and the appellant took her to the hospital and on diagnosis she was admitted for operation and on 03.05.2024 operation of his wife was done which is evident from the medical report of the wife of the appellant. The appellant verbally informed his high-ups about the operation of his wife **(Copies of medical report are attached as Annexure-A)**
3. That the wife of the appellant recovered after about 4/5 days and after her recovery, the appellant went for duty, however, CDI Waqar Khan did not allow him to perform duty and did not mark his presence and also threaten him to put him in quarter guard and his salary was also stopped and CDI Waqar Khan also told him that in few days he will be removed from service on that absence and on the basis of absence charge sheet along with statement allegation were issued to the appellant under E&D Rules 2011. It is pertinent to mention here that the appellant was remain absent from 02.05.2024, but on the next date i.e 03.05.2024 charge sheet was issued to the appellant and when the appellant came for duty after remaining absent for about 4/5 days after the recovery of her wife charge sheet were not handed over to him and after few days charge sheet was communicated to the appellant which was replied in which he gave the reason of his absence. **(Copies of charge sheet and reply to charge sheet are attached as Annexure-B&C)**
4. That inquiry was conducted against the appellant, however, the appellant was not associated with the inquiry proceeding and one sided inquiry was conducted against the appellant. **(Copy of inquiry report is attached as Annexure-D)**
5. That show cause notice was issued to the appellant under Police Rules 1975 (amended 2014) which was replied by the appellant in which he gave the reason of his absence. **(Copies of show cause notice and reply are attached as Annexure-E&F)**
6. That on the basis of absence, the appellant was dismissed from service vide order dated 02.07.2024 under Police Rules 1975 (amended

2014). The appellant filed departmental on 29.07.2024 for his reinstatement, which was not responded within the statutory period of ninety days. **(Copies of order dated 02.07.2024 and departmental appeal are attached as Annexure-G&H)**

7. That the appellant now wants to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUND:

- A) That the orders dated 02.07.2024 and not taking action on the departmental appeal of the appellant within the statutory period of ninety days are against the law, rules, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That in the inquiry proceeding, the appellant was never associated with the inquiry proceeding in order to defend himself, which is violation of law and rules and as such the impugned order is liable to be set aside on this ground alone.
- C) That the appellant did not intentionally remain absent from his duty but due to his illness and his wife illness, he was unable to perform his duty for some days, and was compelled to remain absent from his duty, therefore, needs to be treated with lenient view.
- D) That the penalty of dismissal from service imposed upon the appellant is very harsh, which is passed in violation of law and rule, therefore, the same is not sustainable in eyes of law and hence liable to be set aside.
- E) That the appellant on returning his duty after recovery of his wife from illness, but CDI Waqar Khan did not allow him to perform duty and mark his presence and also threaten him to put him in quarter guard and his salary was also stopped, due to which he couldn't perform his duty.
- F) That the appellant was remain absent from his duty on 02.05.2024 and on the next day he was issued charge sheet dated 03.05.2024 which also shows the malafide on the part of the respondent department
- G) That the opportunity of personal hearing and personal defense was not provided to the appellant, which is against the spirit of Article 10-A of the Constitution.

- H) That the appellant has been condemned unheard and has not been treated according to law and rules and as such the impugn order dated 02.07.2024 is liable to be set aside.
- I) That the appellant is class-IV employee but he was proceeded under Police Rules 1975 (amended 2014), which is against the law and rules.
- J) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that on the acceptance of this appeal, the order dated 02.07.2024 may please be set aside and the appellant may kindly be reinstated into service with all back and consequential benefits. Any other remedy which this Honorable Tribunal deems fit and appropriate that may also be awarded in favour of appellant.

APPELLANT
Saif Ullah

THROUGH:

(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
&

(SHAKIR ULLAH TORANI)
ADVOCATE

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2024

Saif Ullah

VS

Police Department

AFFIDAVIT

I, Saif Ullah Ex-Class-IV (Cook), Elite Force, HQrs Peshawar, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.



DEPONENT

Mr. M. L. Khan
 Mr. M. L. Khan
 Mr. M. L. Khan
 Mr. M. L. Khan
 Mr. M. L. Khan
 Mr. M. L. Khan

Investigation

Mr. M. L. Khan
 Mr. M. L. Khan
 Mr. M. L. Khan
 Mr. M. L. Khan

NAME: Mr. M. L. Khan
 Mobile No. _____
 YEARLY NO. _____
 DATE: 29-04-2014 CNIC# _____

OUT-PATIENTS DEPARTMENT
 DISTRICT HEAD QUARTER
 TEACHING HOSPITAL MARDAN
 Rq. 107-

A
 6

OUT-PATIENTS DEPARTMENT
DISTRICT HEAD QUARTER
TEACHING HOSPITAL MARDAN

Rs. 10/-

(7)

NAME Mr. Sifullah Mobile No. _____

YEARLY NO. 06626

DATE 02-05-27 CNIC# _____

Investigation

cf/s
Abdominal
Pain

As
l/s
Lungs?

Refon. To
S.B. M.R

inj. Dexamethasone

inj. Enoxaparin

inj. analgesic
100 mg

100 mg

opprement
Admit. Sanjwal. B.M
Time: 07:40 PM

OUT-PATIENTS DEPARTMENT
 DISTRICT HEAD QUARTER
 TEACHING HOSPITAL MARDAN

Rs. 10/-

8

NAME mb. S. Khalid Mobile No. _____
 YEARLY NO. 06626
 DATE 03-05-24 CNICH _____

Investigation

ed =
 Abdominal.
 Pcrin
 App. Abdominal
 Hct
 HCU
 HRS
 R.R.S
 Hb/1
 App. Abdominal
 Operation

14. Licens
 inj. 2. Serum 2 LBD
 inj. Tamsul
 inf. P. H. 100ml
 Rd. 500ml. R.D
 Sankod. Colours ✓
 O/S est.
 D/Serum. zone
 Sankod. R.D
 S. L. 0.2 + 0.4
 P. 100ml
 S. L. m.

9

PATHOLOGY DEPARTMENT D.H.O TEACHING HOSPITAL, MARDAN

Patient's Name W/O S. Gulab Gender F ID _____
Test B/C R/S Ref. By _____ Date 02-5-22

SEROLOGY		BIOCHEMISTRY		
Test	Result	Test	Result	Normal Range
Hbs Ag	<u>negative</u>	B. Glucose (F)	<u>98/15</u>	75-105 mg/dL
Anti HCV	<u>negative</u>	B. Glucose (R)		< 140 mg/dL
Anti HIV		B. Urea		15-50 mg/dL
VDRL		S. Creatinine		0.7-1.3 mg/dL
Toxoplasma IgG		S. Uric Acid		2.5-8.0 mg/dL
Toxoplasma IgM		S.T. Bilirubin		0.3-1.2 mg/dL
H. Pylori Stool Ag		S.D. Bilirubin		0-0.3 mg/dL
Anti H.Pylori Ab		S.I. Bilirubin		0-0.7 mg/dL
ASQT		S. ALT		0-35 U/L
RA Factor		S. ALP		38-160 U/L
Dengue NS-1		S. AST		0-35 U/L
Dengue IgG		S. CPK		30-170 U/L
Dengue IgM		S. LDH		20-170 U/L
Widal S.Typhi O		S. Sodium		135-145 mmol/L
Widal S.Typhi H		S. Potassium		3.5-5 mmol/L
Brucella Abortus		S. Chloride		96-108 mmol/L
Brucella Melitensis		S. Calcium		8.6-10.35 mg/dL
<u>HbA1c</u>	<u>9.6</u>	S. Cholesterol		<200 mg/dL
		S. HDL		>40 mg/dL
		S. LDL		<130 mg/dL
		S. Triglycerides		< 250 mg/dL
		S. Troponin I		< 0.1 ng/ml
		S. Troponin T		< 0.03 ng/ml
		S. Amylase		0-130 U/L
		S. Ferritin		30-200 ug/L
		D. Dimers		<300 ng/ml
		C. Reactive Protein		<0.5 mg/dL
		BT		< 8 min
		CT		< 11 min

Comments: _____


Cl. Technician

Pathologist



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQRS, ELITE FORCE PESHAWAR



10

CHARGE SHEET

B

I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority, hereby charge you Class IV Saif Ullah (Cook) of Elite Force as follows:

1. As per vide DD report No.09, dated: 29.04.2024 of Elite Force, HQrs, Peshawar, you left place of posting without prior permission, your mobile was time and again contacted but that was still off, similarly, vide DD report No.06 dated: 02.05.2024 you still absented yourself from lawful duty, which shows a great misconduct on your part.

2. By reason of the above, you appear to be guilty of misconduct under the Civil Servants (Efficiency & Disciplinary) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in the said rules.

3. You are, therefore, directed to submit your defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.

4. Your written defense, if any, should reach the Enquiry Officer within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

5. You are directed to intimate whether you desire to be heard in person.

6. A statement of allegation is enclosed.

SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs Elite Force, Peshawar.



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQRS, ELITE FORCE PESHAWAR



(11)

SUMMARY OF ALLEGATIONS

I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority, am of the opinion that Class IV Saif Ullah (Cook) has rendered himself liable to be proceeded against departmentally as he has committed the following acts and omissions within the meaning of Civil Servants (Efficiency & Disciplinary) Rules, 2011.

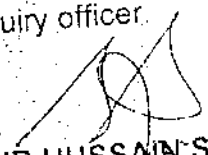
SUMMARY OF ALLEGATIONS

1. As per vide DD report No.09, dated: 29.04.2024 of Elite Force, HQrs, Peshawar, he left place of posting without prior permission, his mobile was time and again contacted but that was still off, similarly, vide DD report No.06 dated: 02.05.2024 he still absented himrself from lawful duty, which shows a great misconduct on your part.

2. For the purpose of scrutinizing the conduct of the said delinquent Class-IV with reference to the above allegations Mr. Ijaz Abazai, DSP/HQrs, Elite Force, Peshawar is appointed as Enquiry Officer.

3. The Enquiry Officer shall, in accordance with the provision of the said Ordinance shall provide reasonable opportunity of hearing to the delinquent Class-IV record statements etc. and submit findings within (25 days) after the receipt of this order.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the enquiry officer.

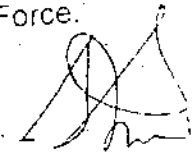

SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs Elite Force, Peshawar.

dated Peshawar the 03/05/2024.

No. 1020-24/SP/HQrs/EF,

Copies to the:-

1. Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. Accountant, of Elite Force, Khyber Pakhtunkhwa Peshawar.
3. OASI/SRC/FMC, Elite Force, Khyber Pakhtunkhwa Peshawar.
4. This Charge Sheet and Summary of Allegations to be served upon the delinquent Class IV Saif Ullah (Cook) through reader to DSP/HQrs, Elite Force.


SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs Elite Force, Peshawar.

Handwritten text in a cursive script, possibly Urdu or Persian, arranged in approximately 15 vertical columns. The text is dense and appears to be a manuscript or a collection of notes. The script is highly stylized and difficult to decipher without specialized knowledge of the language.

بیان ازاں لنگری سیف اللہ

ہیڈ کوارٹر صاحب ایلیٹ فورس پشاور میں خدمت حاضر ہوں۔ کہ من سائل ایلیٹ SP بجوالہ چارج شیٹ مجاریہ کو پیٹ 29.04.2024 فورس میں بطور لنگری بھرتی ہوا ہے اور تاحال اپنی ڈیوٹی سرانجام دے رہا ہے مورخہ کے شدید درد میں مبتلا ہوا۔ گھر والوں نے بغرض علاج معالجہ ڈی ایچ کیو ہسپتال مردان لایا گیا۔ بعد از فراغت صاحب ایلیٹ فورس ہیڈ کوارٹر پشاور CTD علاج معالجہ گھر والے گھر خود لے گئے۔ جملہ حالات واقعات جناب صاحب نے غیر حاضر کیا۔ جملہ میڈیکل کاغذات ہمراہ CDI کے نوٹس میں لایا گیا۔ لیکن بیمار ہونے کے باوجود کو گھر والی 02.05.2024 لف ہیں۔ بیان ہے علاوہ ازیں سائل کے گھر والے اپنیڈ کس میں مبتلا تھی۔ مورخہ کو شدید درد محسوس ہو کر جس کو فوری طور پر بذریعہ ایمر جنسی حالت میں ڈی ایچ کیو ہسپتال مردان لایا گیا۔ جہاں پر ان ڈیوٹی ڈاکٹر صاحب نے فوری طور پر اپریشن کرنے کا مشورہ دیا۔ ڈاکٹر صاحب نے اپنیڈ کیا۔ اپریشن کرنے کے بعد داخل ہسپتال کی گئی۔ اور تقریباً ایک ہفتہ داخل ہسپتال رہے۔ سائل جو کہ گھر کا واحد فرد ہے اور دوسرا زینہ فرد گھر پر موجود نہ ہے۔ بدیں وجہ غیر حاضر رہا اور جملہ میڈیکل کاغذات ہمراہ لف بیان ہے۔ سائل غریب گھرانے سے تعلق رکھتا ہے اور گھر کا واحد کفیل ہے۔ سائل کے ساتھ مہربانی کر کے چارج شیٹ بغیر کسی قانونی کارروائی کے داخل دفتر کرنے کی استدعا کی جاتی ہے۔

مورخہ 20.05.2024

آپکا تابع فرمان لنگری سیف اللہ ایلیٹ ہیڈ کوارٹر پشاور



OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE,
HEADQUARTERS, ELITE FORCE, PESHAWAR.



No. 42 /R, DSP/EF, HQrs

Date: 20 /05/2024.

To: The Superintendent of Police,
HQrs, Elite Force, Peshawar.

Subject: DEPARTMENTAL ENQUIRY AGAINST CLASS-IV SAIF ULLAH (COOK)

Kindly refer to your office Endst: No.1020-24/EF, dated Peshawar the
03.05.2024.

In pursuance of your kind directives, the undersigned has completed
enquiry in the above cited case. Its stepwise detail is given below:

ALLEGATIONS:

That as per DD report No.09, dated: 29.04.2024 of Elite Force HQrs.
Peshawar the delinquent Cook left his place of posting without prior permission, his
mobile was time and again contacted but that was still off, similarly, video DD report
No.06 dated: 02.05.2024 he still absented himself from lawful duty, which amount to
gross misconduct on his part.

PROCEEDINGS:


In this regard, Superintendent of Police, HQrs, Peshawar issued him
Charge Sheet & Summary of Allegations and Deputy Superintendent of Police
Headquarters Elite Force was appointed as enquiry officer.

Charge Sheet & Summary of Allegations was served upon the delinquent
Class-IV on 08.05.2024, in reply to Charge Sheet & Summary of Allegations the
delinquent Class-IV neither appeared in person before the undersigned nor submitted
his written statement after being served Charge Sheet & Summary of Allegations.

CONCLUSION/ RECOMMENDATION:

Having gone through all materials placed on record, it was reflected that
the delinquent class-iv was time and again contacted via his personal cell No.0313-
4442958 to ensure his arrival during the course of enquiry but he did not obey the order
and still denied to appear in person.

The undersigned has reached to conclusion that the delinquent Class-IV
Saif Ullah (Cook) neither take interest nor perform duty anymore and absented himself
without prior permission and also denied to perform duty. It is therefore recommended
allegations leveled against the delinquent Class-IV Saif Ullah (Cook) have been proved
and found guilty.


IJAZ ABAZAI
Deputy Superintendent of Police,
HQrs, Elite Force, Peshawar.



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQRS, ELITE FORCE PESHAWAR



14

EF

FINAL SHOW CAUSE NOTICE

I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Peshawar, as competent authority, under Khyber Pakhtunkhwa Police Disciplinary rules, 1975 (Amendment 2014), do hereby serve upon you Class-IV Saif Ullah (Cook) of Elite Force as follow:

That as per DD report No:09, dated: 29.04.2024 of Elite Force HQrs, Peshawar, you left place of posting without prior permission, your mobile was time and again contacted but that was still off, similarly, vide DD report No.06 dated: 02.05.2024 you still absented yourself from lawful duty.

1. Ongoing through the finding and recommendation of the enquiry officer, the material placed on record, I am satisfied that you have committed the omission/commission specified in Police Rules and charges leveled against you have been established beyond any doubt.

2. As a result therefore, I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Peshawar as competent authority have tentatively decided to impose major penalty upon you, under Police Rules of the said ordinance.

3. You are, therefore, directed to show cause as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

4. If no replay to this notice is received within stipulated time of its delivery in normal course of circumstances, it shall be presumed that you have no defence to put in and in that case an ex- parte action shall be taken against you.

SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs, Elite Force, Peshawar.

Date: 20/05/2024

No. 1114-15 /R,SP/HQrs, EF,

This final show cause notice served upon the delinquent Class-IV Saif Ullah (Cook) through reader to DSP/HQrs, Elite Force, Peshawar and report this office.

16/01-1603818-7-22,605-2

26-05-2024

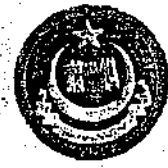
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3-7-24

Enquiry 2024
Vol-2/2024



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQRS, ELITE FORCE PESHAWAR



16
G

date 2/07/2024.

137-72/R, SP/HQr, EF,

ORDER


This order will dispose of the departmental enquiry against the delinquent Class-IV Saif Ullah (cook), that as per DD report No.09, dated: 29.04.2024 of Elite Force, HQrs, Peshawar the delinquent class-IV left his place of posting without prior permission, his mobile was time and again contacted but that was still off. Similarly, vide DD report No.06, dated: 02.05.2024 he still absented himself from lawful duty.

In this regard Charge Sheet and Summary of Allegations No.1020-24/SP/HQrs/EF, dated: 03.05.2024 was issued him and Mr. Ijaz Abazar SP/HQrs, Elite Force, Peshawar, was appointed as enquiry officer. Enquiry officer stated that the delinquent official neither obey the order and nor ensured his arrival and did not appear guilty during the course of enquiry.

Similarly, the delinquent Class-IV was issued vide Final Show Cause Notice No.1114-15/R, SP/HQrs, EF, dated: 20.05.2024, hence, the delinquent Class-IV appeared in person before the undersigned but did not satisfy to the undersigned.

Therefore I, Mr. Shabir Hussain Shah, Superintendent of Police, HQrs, Elite Force, Peshawar, being a competent authority in view of the above facts and recommendation of enquiry officer, major punishment "dismissal from service" is hereby awarded upon the delinquent Class-IV Saif Ullah (cook) from the date of absence, under Police Rules 1975 (Amended 2014).

Order announced!


SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs, Elite Force, Peshawar.

Copy of the above is forwarded for information to the:

1. Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. Superintendent of Police, Elite Force, Peshawar, Region.
3. Accountant, of Elite Force, Khyber Pakhtunkhwa Peshawar.
4. CDI, Elite Force, HQrs, Peshawar.
5. SRC /OASI Elite Force Khyber Pakhtunkhwa, Peshawar.
6. FMC Elite Force Khyber Pakhtunkhwa, Peshawar along with (23 Pages).



A.No: 597/EPTC
Date: 10/7/2024

0313-4442958

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VAKALAT NAMA

NO. _____/2024

IN THE COURT OF

Khyber Pakhtun Khwa Service Tribunal
Peshawar

Saif Ullah

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Department

(Respondent)
(Defendant)

I/We,

Saif Ullah

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT AND SHAKIR ULLAH TORANI ADVOCATE**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2024



(CLIENT)

ACCEPTED


TAIMUR ALI KHAN
Advocate High Court

BC-10-4240
CNIC: 17101-7395544-5
Cell No. 03339390916


SHAKIR ULLAH TORANI
Advocate Peshawar

BC-22-4994
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