


FORM OF ORDER SHEET

Court of _____

Appeal No. _____ **2445/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/11/2024	<p>The appeal of Mr. Junaid Anwar resubmitted today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 19.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

The appeal of Mr. Junaid Anwar received today i.e on 30.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-C & D of the appeal are illegible.
- 2- Annexures of the appeal are unattested.
- 3- Wakalat nama is blank bc filled up.

No. 1007 /Inst./2024/KPST,

Dt. 30/10 /2024.

Amalullah
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv.
High Court at Peshawar.

ST.

Object Remo, file re-submitted.

Amalullah

12/11/2024.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO 2445/2024


Juniad Anwar

V/S

Police Deptt:

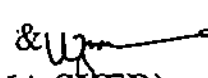
INDEX

S.No	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-05
2.	Affidavit	-----	06
3.	Application Condonation of delay	-----	07-08
4.	Copy of certificate	A.	09
5.	Copy of medical report	B.	10-11
6.	Copy of impugned order	C.	11
7.	copy of discharge slip	D.	12-13
8.	Copy of departmental appeal	E.	14-18
9.	Vakalat Nama	-----	19


APPELLANT
Juniad Anwar

THROUGH:


(SYED NOMAN ALI BUKHARI)
Advocate, High Court, Peshawar


(UZMA SYED)
Advocate, High Court, Peshawar

CELL NO: 0306-5109438

Date: 21/10/2024

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

1

APPEAL NO. 2445 /2024

Juniad Anwar Ex-Constable: No: 4653
CCPO, Peshawar.

.....(Appellant)

VERSUS

1. The Superintendent of Police Cant:, Peshawar.
2. The Capital City Police, Officer, Peshawar.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 10.10.2023 COMMUNICATED TO THE APPELLANT ON 10/06/2024 WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE, ILLEGALLY WITHOUT LAWFUL AUTHORITY AND AGAINST NOT DECIDING DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS SERVICE APPEAL, THE IMPUGNED ORDER DATED 10.10.2023 COMMUNICATED TO THE APPELLANT ON 10/06/2024 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED IN TO SERVICE FROM THE DATE OF DISMISSAL WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

2

1. That the appellant was serving as constable in police deptt. The appellant performed his duties upto the entire satisfaction of his superiors with full zeal and zest and unblemished service record of appellant is evident of that. **Copy of certificate is attached as annexure-A.**
2. That the appellant fell ill became victim of Drug Addiction, therefore cannot attend duties, so absentia of the appellant was not willful but on the ground of illness which is beyond the control of the appellant and the health of the appellant was deteriorating day by day, therefore the appellant was admitted in Hospital for treatment by his father. **Copy of medical treatment is attached as annexure-B**
3. That without serving charge sheet upon the appellant and if any inquiry was conducted but without any opportunity was provided to the appellant and on the basis of one sided inquiry the show cause notice was issued to the appellant the same was not served upon the appellant. So, ultimately the appellant was dismissed from service vide order dated 10.10.2023 the same was not communicated to the appellant. **Copy impugned order is attached as annexure-C.**
4. That the appellant after discharge from hospital on 04/06/2024 appear for duty on 10/06/2024 (after recovery from illness) but the impugned order was handed over to appellant on 10/06/2024. **Copy of discharge slip of hospital is attached as annexure-D.**
5. That the appellant feel aggrieved filling departmental but the same was not receiving by office from him , so, the appellant sent departmental appeal through courier services on 03/07/2024 which was not responded within statutory period of 90 days hence the present appeal on the following grounds amongst other. **Copy of departmental appeal is attached as annexure-E..**

GROUND:

- A. That the appellant was dismissed by the department in fanciful manner without any proof, which is against the law, norms of justices and without lawful authority.
- B. That the impugned order of dismissal of the appellant dated 10/10/2023 is not in accordance with law, facts and evidence on record, hence it is liable to be set aside.

- C. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. that according to reported judgment cited as *2019 CLC 1750* stated that Audi Alterum Partum" shall be read as part and parcel of the every statute.
- D. That the appellant fell ill and remained under treatment at Hospital for DRug Addiction, therefore cannot attend duties, so absentia of the appellant was not willful but on the ground of illness which is beyond the control of the appellant. So, according to superior Court Judgment cited as 2008 SCMR 214 availing medical leave without permission could not be considered an act of gross misconduct entailing major penalty, the major penalty in this case on the basis of absentia on medical ground is so harsh and not commensurate with guilt. So the impugned order is liable to be set-aside.
- E. That impugned order was based on willful absence, so, for the willful absence procedure is provided in Rule 9 of the *E&D rule 2011*, which is so much crystal clear. The authority before imposing major penalty also violates the procedure of Rule-9. So the impugned order is defected in eye of law.
- F. That the appellant was not associated with the inquiry proceedings by the inquiry officer and thus deprived of his legal right of cross examination. Thus the appellant was kept unaware of any inquiry against him.\
- G. That according to reported judgment cited as *1997 PLD page 617* stated that every action against natural justice treated to be void and unlawfully order. Hence impugned order is liable to be set-aside. The natural justice should be considered as part and parcel according to superior court judgment cited as 2017 PLD 173 and 1990 PLC cs 727.
- H. That the appellant was deprived of his inalienable right of personal hearing and proper defense. The Hon'able Service Tribunal has been consistently following this yardstick almost in all cases, so departure from the set pattern and that too without any cogent reason in the present case would cause irreparable damage to the appellant at the cost of substantial justice. Such inquiry proceeding could not be termed as fair, just and reasonable. such practice has already been disapproved by the apex court contained in its judgments *PLD 1989 SC 335, 1996 SCMR 802, 2018 PLC (CS)997 and 2019 SCMR 640.*
- I. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. That according to reported judgment cited as *2019 CLC 1750* stated that Audi Alterum Partum" shall be read as part and parcel of the every statute.

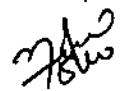
The same principle held in the Superior Court judgments cited as 2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC(cs) 67, where in clearly stated that the penalty awarded in violation of maxim "Audi Alterum Partum" is not sustainable in the eye of law. (4)


- J. That the appellant appeared before the officers and presented his case. But unfortunately the appellant was never given opportunity to present his defense and condemned unheard.
- K. That during the entire service no single complaint regarding misuse of authority, bribery, corruption, misconduct or any other departmental proceedings exist against the appellant.
- L. That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- M. That the penalty of dismissal from service is very harsh which is passed in violation of law and, therefore, the same is not sustainable in the eyes of law.
- N. That the impugned order is against the articles 2A , 4, and 25 , of the constitution of Pakistan 1973.
- O. That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT
Juniad Anwar

THROUGH:


(SYED NOMAN ALI BUKHARI)
Advocate, High Court, Peshawar


(UZMA SYED)
Advocate, High Court, Peshawar

5

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

5

APPEAL NO. _____/2024

Juniad Anwar

V/S

Police Deptt:

AFFIDAVIT

I, Juniad Anwar, (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

DEPONENT


Juniad Anwar

②

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2024

Juniad Anwar

V/S

Police Deptt

.....
**APPLICATION FOR CONDONATION
OF DELAY IN INSTANT APPEAL**

RESPECTFULLY SHEWETH:


1. That the instant appeal is pending before this Honourable Tribunal till no date has been fixed.
2. That the impugned order was received to the appellant on 10/06/2024. So from the date of communication of the order the departmental appeal is filed well within time. So, as per section 4 of KP Service Tribunal Act 1974 and superior court judgments cited as 2016 SCMR 189 and 2023 MLD 1167, the limitation was not started from the date order was born but the limitation was started from the date of communication of the impugned order.
3. That the communication of order shall be shown by the respondent as the order was served upon the appellant on that day, otherwise the appellant claim that the order was received by him on that date consider to be true.
4. That the appellant after discharge from hospital on 04/06/2024 appear for duty on 10/06/2024 (after recovery from illness) the impugned order was handed over to appellant on 10/06/2024 before this impugned order was never communicated to the appellant. So, after knowledge of the same the departmental appeal is well within 30 days.

5. That the august Supreme Court of Pakistan has held that decision on merit should be encouraged as the principal held in judgment cited as 2015 PLC CS 1270. (8)

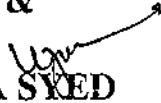
It is therefore most humbly prayed that on acceptance of this application delay if any i.e due to non-communication of order may kindly be condoned and appeal may be decided on merit in best interest of justice.


APPELLANT
Juniad Anwar

THROUGH:


SYED NOMAN ALI BUKHARI
(ADVOCATE, HIGH COURT)

&


UZMA SYED
(ADVOCATE, HIGH COURT)

A-09

A 09

CAPITAL CITY POLICE PESHAWAR



COMBINATION CERTIFICATE

Class III
is awarded to

Mr. FC Junaid No. 4653 S/O _____

R/O _____

In Recognition of

For his good performance of duty in cases against property
year 2017, he is granted cert.

OB No. 3238
DATED 25/08/2017

Senior Superintendent of Police
(Operations)
Peshawar



Dr. Kamran Khan Shinwari

PMC Reg# 719383-03-M
MBBS (KMC PESH), RMP

Patient Name: Imad Ahmad Age: 35y Sex: M Date: 02-10-2024

CLINICAL RECORD

TTC
MEH
Aggressive
CABA
Sleep disturbance

① cap. Cimbex
ob ② 1-1

② cap. Multibionta
ob ③ ① ①

③ Tab. Folic Acid
ob ③ ①

④ Tab. Lebrax
ob ② 1-1

⑤ Tab. Nuborol forte
ob ③ ① ①

453
This office order will dispose off the departmental proceedings against FC Junaid
Anwar No. 4653 who posted at 221 District Office, Peshawar in the allegations that he absented
himself from his lawful duty with effect from 10.02.2023 to 23.03.2023 & 04.04.2023 to 23.05.2023
(total 88 days).

Under Police Rules 1275 (amended 2014) proper charge sheet along with summary of
allegation were issued against him and SDPO Hayatabad was appointed as enquiry officer to
scrutinize the conduct of Constable Junaid Anwar No. 4653. He conducted enquiry proceedings &
submitted finding/report in which the enquiry officer recommended the alleged constable for suitable
punishment as he did not join the enquiry proceedings neither produce any reasonable evidence
regarding the allegations leveled against him.

On receipt of the findings, final show cause was issued against him. He replied to the
final show cause notice. His reply was thoroughly perused but his reply neither found satisfactory nor
convincing. He was repeatedly called to the office through his cell number as well as written parwanas
attached to a memo before the undersigned for personal hearing but till date he did not appear before the
undersigned. His this act is highly unprofessional. This amounts to gross misconduct on his part and
against the discipline of the force. This shows that he does not take any interest in his official duty.
Avoiding inquiry proceeding in itself is misconduct on part of police officer.

After having been gone through all the available material on record including
findings/recommendations of the enquiry officer, I am fully convinced that the charges leveled against
the accused officer are correct beyond reasonable doubt. Therefore, FC Junaid Anwar No. 4653 is
hereby awarded major punishment dismissal from service with immediate effect.

OH No: 2482
Dated: 10/10/2023

WACASIRFIQ #371
SUPERINTENDENT OF POLICE
CANTT. PESHAWAR

No 1234/SUCantt dated Peshawar, the 10/10/2023

Copy for information and necessary action to the:-

1. Capital City Police Officer, Peshawar.
2. The Sr. Superintendent of Police, Operation, Peshawar.
3. The Superintendent of Police Headquarter, Peshawar.
4. SDPO Hayatabad enquiry officers.
5. Pay Officer.
6. CRC.
7. OASI.
8. AD-IT.
9. Fauji Missal branch with enquiry file for record.
10. Official concerned.

10/24

11-A

BETTER COPY OF ANNEXURE - C

This Office order will dispose off the departmental proceedings against DC Junaid Anwar No. 4653 while passed charge CCR Peshawar in the allegations that the absented himself from his alwful duty with effect from 10/02/2023 to 23/03/2023 & 04/04/2023 to 23/05/2023 (total 88 days).

Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of the allegation were issued against him and SDPO Hayatabad was appointed as enquiry officer to scrutinize the conduct of Constable Junaid Anwar No. 4653. He conducted enquiry proceedings and submitted finding / report in which the enquiry officer recommended, the alled constable for suitable punishment as he did not joint the enquiry proceedings neither produced any reasonable evidence regarding the allegations leveled against him.

One receipt of the findings, final show cause was issued against him. He replied to the final show cause notice. His reply was thoroughly perused but his reply neither found satisfactory not convening. He was repeatedly called to the office through his cell number as well as written parwanas attached to appear before the undersigned for personal hearing but till date be did not appear before the undersigned. His tis act is highly unprofessional. This amounts to gross misconduct on his part and against the discipline of the force. This show that he does not take any interest in his official duty avoiding iqiry proceeding in itselfis misconduct on part of police officer.

After having been gone through all the available material on record including findings / recommendations of the enquiry office. I am fully convinced that the charges leveled against the accused officer are correct beyond reasonable doubt. Therefore FC Junaid Anwar No. 4653 os hereby awarded major punishment dismissal from service with immediate effect.

OB No: 2482
Dated: 10/10/2023

WAQAS RAFIQ
Superintendent of Police
Cantt, Peshawar.

No: 1334/SP/Cantt, dated: Peshawar the 31/10/2023

Copy for information and necessary action to the:

1. Capital City Police Officer, Peshawar.
2. The Sr. Superintendent of Police Operation, Peshawar.
3. The Superintendent of Police Headquarter, Peshawar.
4. SDPO Hayatabad Enquiry Officers.
5. Pay Officer
6. CRC
7. OASI
8. AD-IT
9. Faej Missal Branch with enquiry file for record.
10. Official Concerned.

9-12

KASHIF Welfare Foundation **کاشف ویلفیئر فاؤنڈیشن**



Dr. Kamran Khan Shinwari

PMC Reg# 719383-03-M
MBBS (KMC PESH), RMP

Patient Name: Junaid Anwar Age: 35 years Sex: Male Date: 05-06-24

CLINICAL RECORD

It is hereby certified that Junaid Anwar s/o Javed Anwar was admitted as a drug-addicted from 29-02-24 to 04-06-24 in our Institute. He was in a very bad condition. After the recovery, he was fully fit and can resume any type of job.

Chairman
KASHIF WELFARE
FOUNDATION

Secretary
KASHIF WELFARE
FOUNDATION

12 - A

BETTER COPY OF ANNEXURE - D

KASHIF Welfare Foundation

کاشف ویلفیئر فاؤنڈیشن

Dr. Kamran Khan Shiwari
PMC Reg #: 719383-03-M
MBBS (KMC PESH), RMR

Patient No: Junair Anwar

Age: 35 years, SexL Male, Date: 05/06/2024

CLINICAL RECORD

It is hereby certified that Junaid Anwar S/o Javed Anwar was admitted as a Drug Addicted from 29/02/2024 to 04/06/2024 in our institute. He was in a very bad condition. After the recovery, he was fully fit and can resume any type of job.

Address: Branch No. 1, Dag Lara, Maghdarzai, Warsak Road, Peshawar, 0312-9497986 /
0342-9792832 / 0314-9685560

KASHIF Welfare Foundation

Mob: 0312-9498986 / 0342-9792832 / 0314-9685560

DISCHARGE SLIP

13

Ref No: 324

Date: 04-06-24

PATIENT DETAILS

Name: Junaid

Father Name: Javed Anwar

Age:

Phone Number:

CNIC:

Address: Peshawar

GUARDIAN DETAILS

GUARDIAN Name: Javed Anwar

Guardian Father Name: Muhammad Anwar

Guardian Phone Number: 0306-5798818

Guardian CNIC: 17301-2420382-7

Guardian Gender: Male

Guardian Address: Peshawar



Patient Signature

General Secretary
KASHIF WELFARE
FOUNDATION

Duty Incharge Signature



Parent Guardian Signature

To

(14)

Capital City Police Officer,
Khyber Pakhtunkhwa Peshawar.

THROUGH PROPER CHANNEL:

DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 10.10.2023 COMMUNICATED TO THE APPELLANT ON 10/06/2024 WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE ILLEGALLY WITHOUT LAWFUL AUTHORITY.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS DEPARTMENTAL APPEAL, THE ORDER DATED 10.10.2023 COMMUNICATED TO THE APPELLANT ON 10/06/2024 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED IN TO SERVICE FROM THE DATE OF DISMISSAL WITH ALL BACK AND CONSEQUENTIAL BENEFITS.

RESPECTFULLY SHOWNETH:

FACTS:

1. That the appellant was serving as constable in police deptt. The appellant performed his duties upto the entire satisfaction of his superiors with full zeal and zest and unblemished service record of appellant is evident of that. Copy of certificate is attached as annexure-A.



2. That the appellant fell ill became victim of Drug Addiction, therefore cannot attend duties, so absence of the appellant was not willful but on the ground of illness which is beyond the control of the appellant and the appellant is admitted in Hospital for treatment. Copy of medical treatment is attached as annexure-B.
3. That without serving charge sheet upon the appellant and if any inquiry was conducted but without any opportunity was provided to the appellant and on the basis of one sided inquiry the show cause notice was issued to the appellant the same was not served upon the appellant. So, ultimately the appellant was dismissed from service vide order dated 10/10/2023, the same was not served upon the appellant. Copy impugned order is attached as annexure-C.
4. That the appellant, after discharge from hospital on 04/06/2024 appear for duty on 10/06/2024 (after recovery from illness) but the impugned order was handed over to appellant on 10/05/2024. Copy of the discharge report is attached as annexure-D.
5. That the appellant feeling aggrieved filing this departmental appeal well in time after receiving impugned order on the following grounds amongst other.

GROUND:

- A. That the appellant was dismissed by the department vide order dated 10/10/2023 in fanciful manner, which is against the law, norms of justices and without lawful authority.
- B. That the impugned order of dismissal of the appellant dated 10/10/2023 is not in accordance with law, facts and evidence on record, hence it is liable to be set aside.
- C. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules.

that according to reported judgment cited as *2019 CLC 1750* stated that "Audi Alterum Partum" shall be read as part and parcel of the every statute.

D. That the appellant fell ill and remained under treatment at Hospital for Drug Addiction, therefore cannot attend duties, so absence of the appellant was not willful but on the ground of illness which is beyond the control of the appellant. So, according to superior Court Judgment cited as 2008 SCMR 214 availing medical leave without permission could not be considered an act of gross misconduct entailing major penalty, the major penalty in this case on the basis of absence on medical ground is so harsh and not commensurate with guilt. So the impugned order is liable to be set-aside.

E. That impugned order was based on willful absence, so, for the willful absence procedure is provided in Rule 9 of the E&D rule 2011, which is so much crystal clear. The authority before imposing major penalty also violates the procedure of Rule-9. So the impugned order is defected in eye of law.

F. That the appellant was not associated with the inquiry proceedings by the inquiry officer and thus deprived of his legal right of cross examination. Thus the appellant was kept unaware of any inquiry against him.

G. That according to reported judgment cited as *1997 PLD page 617* stated that every action against natural justice treated to be void and unlawfully order. Hence impugned order is liable to be set-aside. The natural justice should be considered as part and parcel according to superior court judgment cited as 2017 PLD 173 and 1990 PLC cs 727.

12

H. That the appellant was deprived of his inalienable right of personal hearing and proper defense. The Hon'able Service Tribunal has been consistently following this yardstick almost in all cases, so departure from the set pattern and that too without any cogent reason in the present case would cause irreparable damage to the appellant at the cost of substantial justice. Such inquiry proceeding could not be termed as fair, just and reasonable. such practice has already been disapproved by the apex court contained in its judgments *PLD 1989 SC 335, 1996 SCMR 802, 2018 PLC (CS)997 and 2019 SCMR 640.*

I. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. That according to reported judgment cited as *2019 CLC 1750* stated that "Audi Alterum Partum" shall be read as part and parcel of the every statute. The same principle held in the Superior Court judgments cited as *2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC(cs) 67,* where in clearly stated that the penalty awarded in violation of maxim "Audi Alterum Partum" is not sustainable in the eye of law.


J. That the appellant appeared before the officers and presented his case. But unfortunately the appellant was never given opportunity to present his defense and condemned unheard.

K. That during the entire service no single complaint regarding misuse of authority, bribery, corruption, misconduct or any other departmental proceedings exist against the appellant.

18

- L. That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- M. That the penalty of dismissal from service is very harsh which is passed in violation of law and, therefore, the same is not sustainable in the eyes of law.
- N. That the appellant is sole bread earner for his family and having long pensionable service record, so, the appellant requested to take lenient view against the appellant and re-instated him into service.
- O. That the appellant requested to condone the delay if any in filing this departmental appeal for the reason that the appellant was admitted at Hospital for treatment and discharge from hospital on 04/06/2024 and the appellant only receiving order of filing this appeal over the time. So he is requested to condone the delay and decide the appeal on merit.
- P. That the impugned order is against the articles 2A, 4, and 25 of the constitution of Pakistan 1973.

IT IS REQUESTED THAT THE APPELLANT BE RE-INSTATED INTO SERVICE AND BE GRANTED ALL BENEFITS AS IF HE HAD NOT BEEN DISMISSED.


 APPELLANT
 Jonaid Aswad

Ex-Consid No: 1657

Date: 03/07/2024

18-A

Best copy

- L. That the appellant has not been under the properly despite he was a Civil Servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- M. That the penalty of dismissal from service is very harsh which is passed in violation of law and therefore the same is not sustainable in the eyes of law.
- N. That the appellant is sole bread earner of his family and having long pensionable service and reinstated into the service.
- O. That the appellant request the condone the delay if any in filing this department appeal for the reason that the appellant was admitted all hospital for treatment and discharge from hospital on 04/06/2024, so the appellant after receiving order, this appeal well in time. So it is ready to condone the delay and decide the appeal on merit.
- P. That the impugned order is against the article 2A, 4 and 25 of the constitution of Paksitan, 1973.

Appeal of the appellant may be accepted as prayed for:

APPELLANT

Junaid Anwar

Ex-Constable No: 4653



18-A

To: PESHAWAR		OVERNIGHT		From: PESHAWAR	
Consignee: Capital City Police Officer Contact: 091 9210452 Address: Capital City Police Officer, Khyber Pakhtunkhwa Peshawar.		 Pieces: 1 Weight:		Shipper: Junaid Anwar Ex- Constable Contact: 0343-9001015, 0344-9052598 Address: HOUSE # 3 Bangla # 7 Tariq Road , Peshawar Contt.	
COD Amount: Rs 100				Return Branch: PESHAWAR Address: Same as above	
Remarks:		Print On : 03-07-2024 16:14:54		Product: Document	
		Order ID : +92 091 9210452 			

نوٹ: (۱) اگر پیکنگ پر ڈاؤن لوڈ ہو تو پارسل قبول نہ کریں۔ (۲) ہم اپنا بی "پروڈکٹ" کے لیے ذمہ دار نہیں ہیں، کسی بھی مسئلے کی صورت میں ان لائن شاہد یا پیمانی والے سے رابطہ کریں۔ (۳) سی. او. ڈی "رقم ادا کرنے سے پہلے پارسل ایسی گھولا جا سکتا۔"

وکالت نامہ

بعدالت جناب KP Services Tribunal

مقدمہ بعنوان

لوڈس ڈسٹریکٹ

منجانب

دعویٰ

بنام

حفید الدین

علت

موردہ

جرم

تھانہ

باعث تحریر آنکہ

مقدمہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ / جملہ

آن مقام بینبار کیلئے سیدو نیمان کل جلالہ کلیمنٹ سنسٹریٹو کیشن

کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا اختیار ہوگا، نیز وکیل

صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جو اب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم

کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور

منسوخی، نیز دائر کرنے اپیل نگرانی نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے

کل یا جزوی کاروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب

مقرر شدہ کو وہی جواب دہ جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا

دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو

وکیل صاحب پابند نہ ہونگے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

مقام بینبار کے لئے منظور ہے

دستخط ایڈووکیٹس سیدو نیمان کل جلالہ

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