

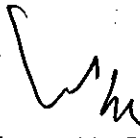
12.01.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Learned counsel for the appellant submitted application for withdrawal of the instant service appeal as the appellant is no more interested to pursue the case further. Application is allowed and the instant service appeal is hereby dismissed as withdrawn. No order as to costs. File be consigned to record room.

ANNOUNCED

12.01.2022


(Atiq-Ur-Rehman Wazir)
Member (E)

16.11.2021

Counsel for the appellant present.

Security and process fee has not been submitted.

Learned counsel for the appellant seeks time to deposit

the same. He is directed to deposit security and process

fee within 7 days, thereafter, notices be issued to the


respondents for submission of written reply/comments.

To come up for written reply/comments on 12.01.2022

before S.B.

Appellant Deposited
Security & Process Fee

16/11/21



(Mian Muhammad)

Member(E)

Ziyad Ahmad 5191/2021


05.07.2021

Mr. Afrasiab Khan Wazir, learned counsel for the appellant present. Preliminary arguments heard.

The instant appeal was filed within time but was returned with office objection for resubmission within fifteen days. After removal of the objections, the same was again returned with further time of 10 days removal of the fresh objection and its resubmission. The appeal has been submitted beyond the 10 days after removal of objections with an application seeking condonation of delay with the reasons given in the application. It appears that the appellant was prevented with reasonable cause from resubmission of the appeal within the stipulated time of 10 days; therefore, delay caused in resubmission of the appeal is condoned. The appellant has challenged the order of the departmental authority through his appeal whereby he in consequence of the disciplinary proceedings has handed down major penalty of compulsory retirement from service. He contends that the impugned order is against the rules, law and against the fundamental rights guaranteed under the constitution. In view of the said contention being arguable, let the respondents submit their written reply/comments for regular hearing of the appeal. Therefore, the appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/comments are not submitted within the

stipulated time or extension of time is not sought, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 16.11.2021 before the D.B.

The appeal is also accompanied with an application for suspension of the impugned order. Notice of the same be also given to the respondents for the date already fixed.




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 5191 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/05/2021 27/05/21	The appeal of Mr. Ziyad Ahmad resubmitted today by Mr. Shahid Muhammad Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.  REGISTRAR
2-		This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/07/21</u>  CHAIRMAN

The appeal of Mr. Ziyad Ahmad Ex-Warder Central Prison Peshawar received today i.e. on 29.09.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of appointment order, medical prescription, Test report of COVID-19, application for change of duty and application for leave mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 2- Copies of charge sheet, statement of allegations and replies thereto are not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 4- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 5- Annexures of the appeal may be attested.
- 6- Annexures of the appeal may be flagged.
- 7- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2805 /S.T,

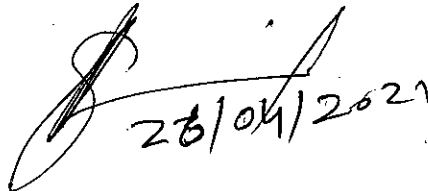
Dt. 30/09 /2020.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shahid Mahmood Khan Adv.

R/Sir

Re-Submitted After Compliance


26/04/2021

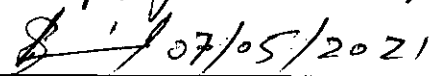
Test report of COVID-19 of the appellant is incomplete. The appeal is again returned to the counsel for the appellant for completion & re-submission within (10) days.

NO: 749 /ST

Dated: 26/4/21

R/Sir

Re-Submitted After Compliance


07/05/2021


26/4/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2020

Ziyad Ahmad. **APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**

I N D E X

S.#	Description of Documents	Annex	Pages
1.	Service Appeal with Affidavit		1-8
2.	Suspension Application with Affidavit		9-11
3.	Addresses of the Parties		12
4.	Copy of Appointment Order	A	13
5.	Copies of Medical Prescriptions	B	14
6.	Copies of Test Reports	C	15-19
7.	Copy of Show Cause Notice	D	20
8.	Copy of Order dated 17.06.2020	E	21
9.	Copy of Departmental Appeal and Order dated 31.08.2020	F	22-24
10.	Copy of Application for Condonation of Delay with necessary documents		25-33
11.	Wakalatnama		34

Ziyad
Appellant

Through

Shahid Mahmood Khan
Shahid Mahmood Khan
Advocate High Court

Dated: 29.09.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. 5191/2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10809

Dated 29/9/2020

Ziyad Ahmad S/o Faqir Khan

R/o Village Mirzai, Shabqadar, District Charsadda.

Ex-Warder, Central Prison, Peshawar. **APPELLANT**

VERSUS

1. Inspector General of Prison, Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Superintendent Headquarters Prison, Peshawar.
4. Superintendent, Central Prison, Peshawar.

.....**RESPONDENTS**

APPEAL U/S 4 OF THE SERVICES
TRIBUNAL ACT, 1974 AGAINST OFFICE
ORDER NO.1886 P/B, DATED 17.06.2020
OF RESPONDENT NO.3, WHEREBY
APPELLANT WAS COMPULSORY RETIRED
FROM SERVICE AND WAS AWARDED
MAJOR PENALTY BY RESPONDENT NO.3.

Filed on day

29/09/2020
Registrar

PRAYER:

On acceptance of this appeal, order No.1886 P/B, dated 17.06.2020 of respondent No.3 may kindly be set aside and the appellant may be restored to his service with all back benefits.

Re-submitted to -day
and filed.

Registrar

2/5/2021

Respectfully Sheweth:

1. That on 02.05.2009, appellant was appointed in the respondents' department and since then the appellant formed his duty with honesty and keen interest and never neglected his duty which is evident from the record. (Copy of Appointment Order is attached).
2. That appellant during the aforesaid period served in various police prisons and no complaint, whatsoever, was advanced against him.
3. That the appellant has unblemished service record at his credit, which is evident from his service record as no complaint and show cause notice etc. have been given to him.
4. That it is pertinent to mention here that appellant is suffering from various diseases and he is still under treatment from a Psychiatrist. (Copies of Medical Prescriptions are attached).
5. That as per penalty order dated 17.06.2020, the appellant has been shown to be absent from duty w.e.f. 28.02.2020 in the mentioned period the appellant was under treatment and severe surveillance of the doctors

concerned, which is evident from the medical record of the appellant.

6. That at the end of February, 2020 the COVID-19 pandemic was spread in Pakistan which affected each and every person from different walks of life, the appellant was tested positive for COVID-19 and was under severe ailment that's why he was unable to walk and to perform his duty as he was also restrained by doctors and Government notifications for COVID-19 infected persons. (Copies of Test Reports are attached).
7. That the appellant belongs to a poor and peaceful family of District Charsadda and appellant is the head of his family consisting of 13 members for which the appellant is the only source of income and there is no other source of income except his monthly salary, which can be verified.
8. That the wife of appellant is also suffering from serious diseases which require full time attention and checkup from doctors concerned that's why the appellant filed an application to respondent No.1 to change the duty of appellant from night to daytime and the respondent

No.1 directed respondent No.4 at the spot to change the duty of the appellant.

9. That the respondents were duly informed by the appellant about his illness and disability to join and perform his duty through one of his relative but unfortunately the application of appellant was not entertained by the respondents and there was no one in the family of appellant to pursue the leave application of the appellant that's why the respondents proceeded against him and imposed a major penalty of compulsory retirement from service on the account of willful absence from duty.
10. That on 10.04.2020, a show cause notice was issued to appellant for misconduct and he was asked to file a reply within seven (07) days of the receipt of this notice and it has clearly been mentioned in the notice that there is no need of holding any further inquiry, meaning thereby that the respondent No.3 has already intended to proceed against the appellant and to impose a major penalty without holding inquiry and

following the proper procedure. (Copy of Show Cause Notice is attached).

11. That on 17.06.2020, respondent No.3 vide order No.1886 P/B, issued an office order vide which imposed a major penalty of compulsory retirement from service as ex-parte action as the appellant was not given a single chance to be heard. (Copy of Order dated 17.06.2020 is attached).
12. That on 30.06.2020, the appellant filed a departmental appeal/ representation before the good office of respondent No.1 as competent authority against the order dated 17.06.2020, which was turned down vide order dated 31.08.2020. (Copy of Departmental Appeal and Order dated 31.08.2020 are attached).
13. That the appeal in hand is well within time and this Hon'ble Tribunal has got jurisdiction to entertain the same.
14. That the appellant feeling aggrieved from the orders dated 17.06.2020 & 31.08.2020 passed by respondents No.1 & 3, finding no other adequate, alternate and efficacious remedy, approaches this Hon'ble Tribunal, inter alia on the following grounds:-

GROUND S:


- A. That the order dated 17.06.2020 passed by respondent No.3 is against the Rules, law and against the fundamental rights guaranteed under the constitution, thus be declared as null and void.
- B. That the appellant was not given a chance to be heard and to defend himself through cogent and reasonable reasons, hence the order dated 17.06.2020 is liable to be set aside on this score alone, because the appellant was condemned unheard.
- C. That even then, the inquiry was not conducted as per the mandate of law as no statement of any concerned was recorded nor appellant was afforded opportunity of cross examination what to speak of providing himself defence and personal hearing in the matter being mandatory.
- D. That general allegations were leveled against appellant for being absent from duty but he was not given a chance to defend himself and disprove the allegations.
- E. That the orders passed by respondents are based on malafide as they have been passed by bypassing the

mandatory provisions of law, hence the orders are liable to be struck down.

It is, therefore, most humbly prayed that on the acceptance of this appeal, order dated 17.06.2020 of respondent No.3 be set aside and appellant be reinstated into his service with all consequential benefits.


Appellant

Through


Shahid Mahmood Khan
Advocate High Court

Dated: 29.09.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2020

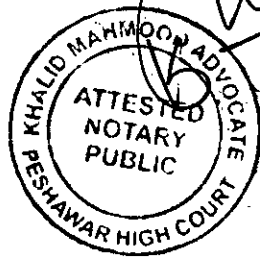
Ziyad Ahmad. **APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**

A F F I D A V I T

I, Ziyad Ahmad S/o Faqir Khan (Ex-Warder, Central Prison, Peshawar) R/o Village Mirzai, Shabqadar, District Charsadda, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.



Ziyad
DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Re:

Service Appeal No. _____/2020

Ziyad Ahmad. **APPLICANT/APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**

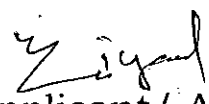
APPLICATION FOR SUSPENSION OF
OPERATION OF THE IMPUGNED ORDER
DATED 17.06.2020 PASSED BY
RESPONDENT NO.3, TILL THE FINAL
DECISION OF THE INSTANT SUIT.

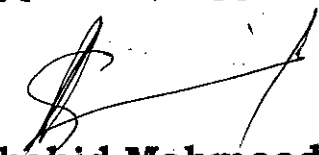
Respectfully Sheweth:

1. That the above titled appeal is being filed before this Hon'ble Tribunal, in which no date of hearing has yet been fixed.
2. That the grounds agitated in the main appeal may be considered as part and parcel of the instant application.

3. That on the face of it, the applicant/ appellant has got a strong arguable case and is sanguine about its success.
4. That the balance of convenience also leans in favour of applicant/ appellant.
5. That if the operation of impugned order dated 17.06.2020 is not suspended then the applicant/ appellant would suffer irreparable loss.

It is, therefore prayed that on acceptance of this application, the operation of the impugned order dated 17.06.2020 may kindly be suspended, till the final decision of the instant appeal.

Through 
Applicant/ Appellant


Shahid Mahmood Khan
Advocate High Court

Dated: 29.09.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Re:

Service Appeal No. _____/2020

Ziyad Ahmad. **APPLICANT / APPELLANT**

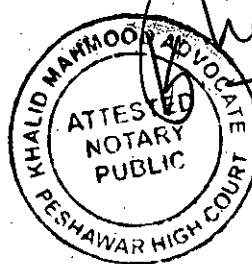
VERSUS

Inspector General of Prison & others. **RESPONDENTS**

A F F I D A V I T

I, Ziyad Ahmad S/o Faqir Khan (Ex-Warder, Central Prison, Peshawar) R/o Village Mirzai, Shabqadar, District Charsadda, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

Ziyad Ahmad
DEPONENT
29-9-20



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2020

Ziyad Ahmad. **APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**

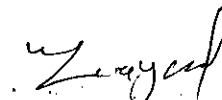
ADDRESSES OF THE PARTIES

APPELLANT:

Ziyad Ahmad S/o Faqir Khan
R/o Village Mirzai, Shabqadar, District Charsadda.
Ex-Warder, Central Prison, Peshawar.

RESPONDENTS:

1. Inspector General of Prison, Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Superintendent Headquarters Prison, Peshawar.
4. Superintendent, Central Prison, Peshawar.


Appellant

Through


Shahid Mahmood Khan
Advocate High Court

Dated: 29.09.2020



Annex A

OFFICE OF THE
SUPERINTENDENT

13

HEADQUARTERS PRISON PESHAWAR
NO. 747 /PB-dt: 21 /5 /2009

To: Mr. Ziyad Ahmad S/O Faqir Khan
Village Mirzai Post Office Shabqadar District Charsadda.

Subject: APPOINTMENT AS WARDER (BPS-05).
Memo:

Reference your test interview for the subject post.

You are hereby offered the post of temporary Warden in BPS-05 (2780-135-6830) and other allowances as admissible under the rules subject to the following conditions:

- 1- You are liable to serve anywhere in the Jails of NWFP.
- 2- Your appointment is purely temporary and your services can be terminated at any time assigning any reasons during probationary period.
- 3- For all other purposes such as pay, T.A & Medical attendance etc you will be governed by the applicable to the Government Servants of your category.
- 4- The terms and conditions of your appointment as Warden will be those as laid down in the Service Rules 1960 NWFP, Prisons Department (Recruitment, Promotion and Transfer) rules and all other rules and regulations prescribed in this respect in the Prisons Act/Pakistan Rules and any other rules which may be applicable to Government Servants or the rules which be promulgated by the Government from time to time in this behalf.
- 5- Your appointment will be subject to your Medical fitness and passing of Warders Basic Course.
- 6- No T.A/D.A will be admissible to you on joining your first appointment.
- 7- You cannot resign from the service immediately but will have to put in writing at least of prior notice or in lieu thereof, one month pay shall be forfeited from you.
- 8- Your appointment is subject to fulfillment of all the conditions laid down in the service rules.
- 9- You will be on probation for a period of two years extendable to one more year.
- 10- Your services shall be liable to termination without any notice if your work and conduct unsatisfactory during probationary period or if you fail to qualify Warders Basic Training.
- 11- If you accept the appointment on the above terms and conditions then you may report Superintendent Central Prison Haripur on 13-05-2009 to undergo Warders Basic Training, Warders Training School Haripur.
- 12- On your report for training, it will be taken for granted that you have accepted all the above terms and conditions and if you fail to report on 13-05-2009 for training at Central Prison Haripur be presumed that you have declined to accept the offer, hence this offer of appointment is cancelled.
- 13- You are directed to attend this office immediately for your Medical Examination at Services Hospital Peshawar.

(MASUD-UR-RAHMAN)
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

Endorsement No: 748-50

Copy forwarded to: -

- 1- The Superintendent Central Prison Haripur. He is requested to send arrival report of the concerned Superintendent Jail along with his Service Book duly completed in all respects intimation to this Headquarters.
- 2- The Superintendent Central Prison Haripur. The above named Warden is attached with the purpose of pay and allowances during training period.
- 3- The District Accounts Officer Haripur.

ATTESTED

(MASUD-UR-RAHMAN)
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
Ph. No. 091-219544 Fax. No. 091-219544

<Musawer/>

Amel

"B"

14

دَحَقِ آواز
تنظیم برائے انسداد منشیات
وسوشل ویلفیئر

DA HAQ AWAZ
PESHAWAR BRANCH

Office Contact No: 091-5201771
Office Mobile No: 0917-6197001 | 0310-1995192
Email: dahaqawazpk@gmail.com
Address: House No.9 Canal Road Abshar Colony
Warsak Road Peshawar

Adnan Khan
General Secretary
0344-9054008

www.dahaqawazpk.blogspot.com www.facebook.com/dahaqawazofficial

DA HAQ AWAZ
Anti Drugs Organization



دَحَقِ آواز
تنظیم برائے انسداد منشیات
وسوشل ویلفیئر



تاریخ 25-11-2020

نام جناب Ziyat-Ahmad

چندہ ماہ: گھنٹہ ماہ لائی رقم: _____ بعد شکر یہ وصول پائے:

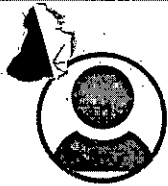
دستخط وصول کنندہ: _____

عدنان خان 0344-9054008

(بغیر رسید کے کسی کو رقم نہ دیکھا جائے)

برائے مہربانی دوران ملاقات پرچی ساتھ لائیں۔
پتہ: ہاؤس نمبر 9 کینال روڈ آبشار کالونی ورسک روڈ پشاور Ph # 091-5201771
email. Dahaqawazpk@gmail.com website. www.dahaqawaz.org

ATTESTED



COVID19/PAK/KP/130/90015



Ziyad Ahmad S/O Faqir Khan

Male, 29 years of age

CNIC: 17103-0341175-1 (own)

Contact: 0312 9135937

Address: Kohat Cantt (district Charsadda of Khyber Pakhtunkhwa)

Ahmed

"C"
15

ATTESTED

Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



5583

EPID no	COVID19/PAK/KP/130/90015		
Sample Date	03/Apr/2020		
Shipment Date	03/Apr/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Blood <input type="checkbox"/>
	Others : _____		

Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:**Patient type:** Quarantine/ isolation / contact/ symptomatic

Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqir Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#		Street #	
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		

Symptoms	New loss of taste or smell (), Fatigue (), Congestion or runny nose (), Headache (), Diarrhea (), Body Achè (), Sore Throat (), Shortness of Breath (), Cough / Dry Cough (), Fever ()
Date of Symptom oniset	30-Sep-2020
Travel History (If any)	1. Pakistan - 08/Mar/2020,
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure

ATTESTED

Signature
23/10/20

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case defination. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf

Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



5289

EPID no	COVID19/PAK/KP/130/90015		
Sample Date	25/Mar/2020		
Shipment Date	25/Mar/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Blood <input type="checkbox"/>
	Others : _____		

Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:**Patient type:** Quarantine/ isolation / contact/ symptomatic

Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqr Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#		Street #	
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		

Symptoms	New loss of taste or smell (), Fatigue (), Congestion or runny nose (), Headache (), Diarrhea (), Body Ache (), Sore Throat (), Shortness of Breath (), Cough / Dry Cough (), Fever (),
Date of Symptom onset	30-Sep-2020
Travel History (If any)	1. Pakistan - 08/Mar/2020,
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure

ATTESTED

Signature

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case definition. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf

Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



9415

EPID no	COVID19/PAK/KP/130/90015		
Sample Date	19/Apr/2020		
Shipment Date	19/Apr/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Blood <input type="checkbox"/>
	Others : _____		

Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:

Patient type: Quarantine/ isolation / contact/ symptomatic

Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqir Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#		Street #	
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		

Symptoms	New loss of taste or smell (), Fatigue (), Congestion or runny nose (), Headache (), Diarrhea (), Body Ache (), Sore Throat (), Shortness of Breath (), Cough / Dry Cough (), Fever (),
Date of Symptom onset	30-Sep-2020
Travel History (if any)	1. Pakistan - 08/Mar/2020,
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure

ATTESTED

Signature
23/10/20

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case definition. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf

Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



5585

EPID no	COVID19/PAK/KP/130/90015		
Sample Date	10/Apr/2020		
Shipment Date	10/Apr/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Blood <input type="checkbox"/>
	Others : _____		

Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:

Patient type: Quarantine/ isolation / contact/ symptomatic

Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqir Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#		Street #	
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		

Symptoms	New loss of taste or smell (), Fatigue (), Congestion or runny nose (), Headache (), Diarrhea (), Body Ache (), Sore Throat (), Shortness of Breath (), Cough / Dry Cough (), Fever (),
Date of Symptom onset	30-Sep-2020
Travel History (If any)	1. Pakistan - 08/Mar/2020,
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure

ATTESTED

[Signature]
Signature

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case definition. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf

19A



Public Health Reference Lab

Public Health Reference Lab, Peshawar, Khyber Medical University, Phase-V, Hayatabad,
Peshawar,
Contact:0333 4160303

MR #:	205-200427-173	Visit No:	205-270420-215
Ref-No:	COVID19/PAK/KP/130/90015	Order No:	20520987
Patient Name:	Mr. Ziyad Ahmad	Booking:	Apr 27, 2020
Age Gender:	29 Y Male	CNIC:	1710303411751
Ref.Consultant:	Dr Sami Baist Dhq Kohat		

Molecular Biology | **Real-Time PCR for Corona Virus (SARS-CoV-2)**

Result

Not Detected

Booking: Apr 27, 14:15 **Sampling:** Apr 27, 15:30 **Result Processed:** Apr 28, 10:30 **Verified:** Apr 29, 10:35

Method:

The test was performed after RNA extraction (Qiagen Viral RNA Mini Kit) on ABI 7500 Real Time RT-PCR detection system with internal and external positive controls, using the SARS-CoV-2 protocol.

Report has been electronically verified, pathologist signatures not required.

Dr. Yasir Mehmood
Yousafzai

MBBS, PGDIP, PhD (Haem)
Consultant Haematologist

Dr. Asif Ali

MBBS, PGDIP, MHPE, PhD
(Pathology)
Pathologist

Dr. Jawad Ahmed

MBBS, MSc, Ph.D Microbiology
Microbiologist

Dr. Tayyab Ur Rehman

MBBS, Ph.D Microbiology
Microbiologist

Dr. Hafsah Muhammad

Ph.D., M.Phil, DPH
Clinical Scientist (Bio-safety Office
BSO)

Amal "D" 20

SHOW CAUSE NOTICE UNDER RULE-5(I) READ WITH RULE-7 OF THE KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY & DISCIPLINE) RULES,

2011.

You, the following **Watch & Ward Staff** attached to Central Prison Peshawar have willfully absented yourselves from your allotted duties as well as jail premises without prior permission of the Competent Authority from the dates as mentioned against each and are still at large, which constitutes gross misconduct: -

S#	Name of accused official	Absent w.e.f
1	Head Warden Abdul Zahid	23-03-2020
2	Warder Asfandyar	29-01-2020
3	Warder Zeyad Ahmad	28-02-2020
4	Warder Aman	17-03-2020

I, Superintendent Headquarters Prison Peshawar as Competent Authority, am satisfied by the report received through the Superintendent Central Prison Peshawar vide his report endorsement No. 5212-13/WE dated 08-04-2020 and there is no need of holding any further inquiry.

Now therefore, you the above accused Watch & Ward Staff are hereby called to show cause within 07 days of the receipt of this notice as to why you should not be dismissed from service for above stated act of misconduct.

In case, your replies do not reach this office within stipulated period, ex-parte action shall be taken against you.

Sd
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

Endorsement No: 1163-69/- dated: 10/04/2020

Copy of the above is forwarded to the: -

- 1- Superintendent Central Prison Peshawar with reference to his report quoted above. **These Show-Cause Notices may be sent to the above accused officials at their home address through registered post under intimation to this Headquarters.**
- 2- Head Clerk (Pay Branch) Central Prison Peshawar. **Salaries of the above officials may be stopped/ frozen immediately under intimation to this Headquarters.**
- 3- Head Warden Abdul Zahid
- 4- Warden Asfandyar
- 5- Warden Zeyad Ahmad
- 6- Warden Aman

C/o Superintendent Central Prison Peshawar.

Abul
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
E-mail: hqprisonpeshawar@gmail.com

[Signature]
ATTESTED

Annex "E" 21

OFFICE ORDER

WHEREAS, the accused Warder (BPS-07) Ziyad Ahmad attached to Central Prison Peshawar was proceeded against under Rule(5)(1) Read with Rule-7 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his misconduct as mentioned in Show-Cause Notice served upon him vide this Headquarters No. 1163-69 dated 10-04-2020.

AND WHEREAS, being still absent from duty, the said notice was sent to the above accused at his home address through registry post, wherein he was directed to submit his reply to the Show-Cause Notice within stipulated period i.e. 07 days after its delivery, but he failed to do so, and remained at large.

NOW THEREFORE, in exercise of powers conferred under Rule-14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 having considered the charges leveled against him in light of the evidence and record, the undersigned being Competent Authority is hereby pleased to award him the major penalty of Compulsory Retirement from Service with immediate effect as ex-parte action with further orders as under:-

2- His period of absence w.e.f 28-02-2020 to 16-06-2020 is hereby treated as without pay.

[Signature]

SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR.

Endorsement No: 1887-91

Copy of the above is forwarded to the:-

- 1- Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar please.
- 2- Superintendent Central Prison Peshawar with reference to his report No. 5212-13 dated 08-04-2020.
- 3- Accountant General, Khyber Pakhtunkhwa Peshawar, please.
- 4- Head Clerk (Pay Branch) Central Prison Peshawar.
- 5- Warder concerned C/o Superintendent Central Prison Peshawar at his home address through registered post.

ATTESTED

[Signature]

[Signature]
SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR
E-mail: hqprisonpeshawar@gmail.com

Amrek

(F)

22

To:

IG Prison
KPK, Peshawar.

Subject: Departmental Appeal for Cancellation of Compulsory Retirement Office Order No. 1886 P/B Dt: 17/06/2020

Respected Sir,

With profound respect I have the honour to submit my grievance petition / appeal against the above mentioned order of the Superintendent Headquarters Prison Peshawar KPK Peshawar with the following suitable reasons and favour consideration, please:-

1. That the applicant / petitioner is serving in Central Prison Peshawar since 2019 as Warder (BPS-07). The applicant / petitioner performed his duties with keen interest and never violate the rules and regulations and always obey and regards his seniors.
2. That the applicant / petitioner belong to a noble and poor family of District Charsadda and also family head consisting of 13 member and the petitioner is the only source of income of the family and there is no other source of income except my monthly pay.
3. That the appellant / petitioner served in this department for 11 years and have wide experience.
4. That the appellant / petitioner always come to duty regularly and never come to Jail late.
5. That the applicant / petitioner never create any problems / issue to the department as well as his seniors in this regard during performing of duties at various Jail / stations.
6. That now the appellant / petitioner has been retired from his service compulsory vide Office Order No 1886/P/B Dt: 17/06/2020 which is against the law and also against the fundamental rights of the appellant / petitioner.
7. That the appellant / petitioner has also informed IG that my duty be changed from night to day because serious illness of my wife. That there is no one for look after of his wife / Childrens and Old mother, IG agreed that your duty be change from night to day and order on the spot to Supt Jail for changing the duty.

ATTESTED

D. NO.

11409

30/06/2020

23

It is therefore most humbly prayed that on acceptance of this appeal, the above mentioned order may kindly be cancelled and the appellant / petitioner may proved a chance of further service to look after his family with regards and also proved a chance of service to utilize his experience

The applicant will pray for your long life and proseperity.

Yours Obediently

Ziyad Ahmad Warder (BPS-7)

0312-9135937

ATTESTED

6



**INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

91-9210334, 9210406 091-9213445

No. Estb/Ward-/Orders/ 30442 -

Dated: 31-08-2020 -

ORDER

WHEREAS, Ex-Warder Ziyad Ahmad attached to Central Prison Peshawar, was awarded the major penalty of "Compulsory Retirement from service" by Superintendent HQ Prison Peshawar vide his order No.1886 dated 17-06-2020 due to his misconduct and willful absence from duty with effect from 28-02-2020 to 16-06-2020.

AND WHEREAS, the said warder preferred his departmental appeal for setting-aside the penalty awarded to him, which was examined in light of the available record of the case and it was observed that his appeal is without any substance and penalty was awarded to him by the competent authority due to his willful absence from duty as referred to above after observing all legal and codal formalities as required under the E & D Rules.

NOW THEREFORE, keeping in view the facts on record, the provision of rules in vogue and in exercise of power conferred under Rule-5 of Khyber Pakhtunkhwa Civil Servants Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being without any substance.

**INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.**

ENDST; NO. 30443-45 T.

Copy of the above is forwarded to :-

1. The Superintendent, Headquarters Prison Peshawar for information and necessary action with reference to his Order referred to above.
2. The Superintendent, Central Prison Peshawar for information and necessary action with reference to the Superintendent HQ Prison Peshawar order referred to above. He is directed to inform the appellant accordingly and also to make necessary entry in his Service Book under proper attestation.
3. Ex-Warder Ziyad Ahmad, C/O Superintendent Central Prison Peshawar at his home address through-registered post, for information.

**ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

ATTESTED

19/11/20

*Info warder
31.8.2020*

31/8

Amir *GR* 25

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Re:

C.M.No. _____/2021

In

Service Appeal No. _____/2020

Ziyad Ahmad. **APPLICANT/APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**


APPLICATION FOR CONDONATION
OF DELAY IN RE-SUBMISSION/
FILING OF THE INSTANT APPEAL.

Respectfully Sheweth:

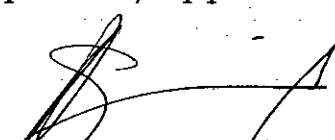
1. That the titled Appeal was filed before this Hon'ble Tribunal, which was duly returned vide Diary No.2805/S.T, dated 30.09.2020 for re-submission within fifteen (15) days, as there were some deficiencies of documents.
2. That the applicant/ appellant is suffering from various diseases, such as Mental Disorder and he had taken the original file with him and subsequently he was admitted in Rehabilitation Center namely Da Haq Awaz, where he is still admitted, beside this the applicant/ appellant was COVID-19 positive. (Copy of Admit Card is attached).

3. That the applicant/ appellant was not in his senses and he had lost the original case file, which was at last found after thorough efforts of his brother.
4. That as the period of limitation has completed during the illness and the reasons mentioned ibid, which still persist, therefore, the applicant/ appellant was unable to resubmit/file the instant appeal and which fact cause a delay in re-filing of instant appeal.
5. That the law favours adjudication on merits rather non-suiting the parties on mere technicalities.
6. That as precious rights of applicant/ appellant are involved, therefore, it is just, fair as well as in larger interest of justice that the delay in re-filing the instant appeal be condoned.
7. That it is pertinent to mention here that the appeal in hand was filed within time, but was returned due to deficiencies.

It is, therefore prayed that by accepting this application, the delay in re-filing/ resubmission of instant appeal may please be condoned in the best interest of justice.


Applicant/Appellant

Through


Shahid Mahmood Khan
Advocate High Court(s)

Dated: 02.02.2021

27

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Re:

C.M.No. _____/2021

In

Service Appeal No. _____/2020

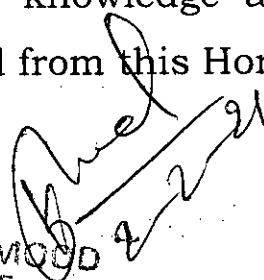
Ziyad Ahmad. **APPLICANT/APPELLANT**

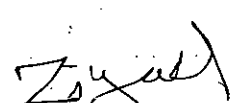
VERSUS

Inspector General of Prison & others. **RESPONDENTS**

A F F I D A V I T

I, Shehzad Ahmad S/o Faqir Khan R/o Village Mirzai, Shabqadar, District Charsadda (brother of applicant/appellant), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.


KHALID MAHMOOD
ADVOCATE
Oath Commissioner
Peshawar High Court


DEPONENT

28

دَحَقِ آواز
تنظیم برائے انسداد منشیات
وسوشل ویلفیئر

DA HAQ AWAZ
PESHAWAR BRANCH

Office Contact No: 091-5201771
Office Mobile No: 0929-6197001 | 0310-1995192
Email: dhaqawazpk@gmail.com
Address: House No.9 Canal Road Abshar Colony
Warsak Road Peshawar

Adnan Khan
General Secretary
0344-9054008

www.dhaqawazpk.blogspot.com www.facebook.com/dhaqawazofficial

DA HAQ AWAZ
Anti Drugs Organization



دَحَقِ آواز
تنظیم برائے انسداد منشیات
وسوشل ویلفیئر



تاریخ: 23-11-2020

نام جناب: Ziyat Ahmad

بعد شکر یہ وصول پائے:

چشمداشت ماہ: نومبر ماہ لازمی

دستخط وصول کنندہ: [Signature]

0344-9054008 **عزیزان خان**

email: Dhaqawazpk@gmail.com
website: www.dhaqawaz.org

Ph # 091-5201771

(بغیر رسید کے کسی کو رقم نہ دیکھا جائے)
برائے مہربانی دوران ملاقات پر جی ساتھ لائیں۔
پتہ: ہاؤس نمبر 9 کینال روڈ آبشار کالونی ورسک روڈ پشاور

ATTESTED



COVID19/PAK/KP/130/90015



Ziyad Ahmad S/O Faqir Khan

Male, 29 years of age

CNIC: 17103-0341175-
1 (own)

Contact: 0312
9135937

Address: Kohat Cantt (district Charsadda of Khyber
Pakhtunkhwa)

29

ATTESTED

Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



5583

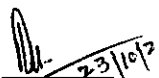
EPID no	COVID19/PAK/KP/130/90015		
Sample Date	03/Apr/2020		
Shipment Date	03/Apr/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Blood <input type="checkbox"/>
Others :	_____		

Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:**Patient type:** Quarantine/ isolation / contact/ symptomatic

Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqir Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#		Street #	
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		
Symptoms	New loss of taste or smell (), Fatigue (), Congestion or runny nose (), Headache (), Diarrhea (), Body Ache (), Sore Throat (), Shortness of Breath (), Cough / Dry Cough (), Fever (),		
Date of Symptom onset	30-Sep-2020		
Travel History (If any)	1. Pakistan - 08/Mar/2020,		
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure		


23/10/20
Signature

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case definition. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf

ATTESTED

Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



5289

EPID no	COVID19/PAK/KP/130/90015		
Sample Date	25/Mar/2020		
Shipment Date	25/Mar/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Boold <input type="checkbox"/>
	Others : _____		

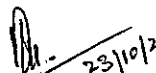
Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:**Patient type:** Quarantine/ isolation / contact/ symptomatic

Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqir Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#	Street #		
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		

Symptoms	New loss of taste or smell (<input type="checkbox"/>) , Fatigue (<input type="checkbox"/>) , Congestion or runny nose (<input type="checkbox"/>) , Headache (<input type="checkbox"/>) , Diarrhea (<input type="checkbox"/>) , Body Ache (<input type="checkbox"/>) , Sore Throat (<input type="checkbox"/>) , Shortness of Breath (<input type="checkbox"/>) , Cough / Dry Cough (<input type="checkbox"/>) , Fever (<input type="checkbox"/>) ,
Date of Symptom onset	30-Sep-2020
Travel History (If any)	1. Pakistan - 08/Mar/2020,
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure


Signature

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case defination. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf

~~ACCEPTED~~

Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



9415

EPID no	COVID19/PAK/KP/130/90015		
Sample Date	19/Apr/2020		
Shipment Date	19/Apr/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Blood <input type="checkbox"/>
	Others : _____		

Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:

Patient type: Quarantine/ isolation / contact/ symptomatic

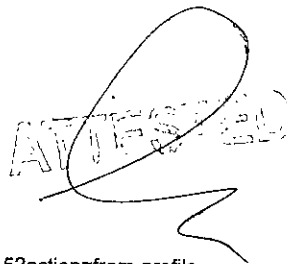
Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqr Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#		Street #	
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		

Symptoms	New loss of taste or smell (), Fatigue (), Congestion or runny nose (), Headache (), Diarrhea (), Body Ache (), Sore Throat (), Shortness of Breath (), Cough / Dry Cough (), Fever (),
Date of Symptom onset	30-Sep-2020
Travel History (If any)	1. Pakistan - 08/Mar/2020,
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure


Signature

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case definition. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf



Laboratory Test Request Form

Suspected Novel Coronavirus Cases

Khyber Pakhtunkhwa Public Health Reference Laboratory (KP-PHRL)

KMU / PHRL (Khyber Medical University) Laboratory Peshawar

0333-4160303



5585

EPID no	COVID19/PAK/KP/130/90015		
Sample Date	10/Apr/2020		
Shipment Date	10/Apr/2020		
Sample Type	Oropharyngeal swab <input type="checkbox"/>	Nasopharyngeal swab <input type="checkbox"/>	Whole Blood <input type="checkbox"/>
	Others : _____		

Interviewer Information:

Physician Name	Dr. Khan Askar
Designation	Deputy Medical Superintendent
Hospital / Site	DHQ Hospital KDA Kohat
Contact Number	03339683752

Patient Information:**Patient type:** Quarantine/ isolation / contact/ symptomatic

Full Name	Ziyad Ahmad		
Father/ Husband Name	Faqr Khan		
Nationality	Pakistani		
Age (in Years)	29	Sex :	Male
CNIC #	17103-0341175-1		
House#		Street #	
Mohallah/ Village	Shabqadar, Kohat Cantt		
District/Tehsil	Charsadda / Shabqadar	Province	Khyber Pakhtunkhwa
Contact #	0312 9135937		
Symptoms	New loss of taste or smell (), Fatigue (), Congestion or runny nose (), Headache (), Diarrhea (), Body Ache (), Sore Throat (), Shortness of Breath (), Cough / Dry Cough (), Fever (),		
Date of Symptom onset	30-Sep-2020		
Travel History (If any)	1. Pakistan - 08/Mar/2020,		
Has the patient had contact with a confirmed case	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Other Exposure		

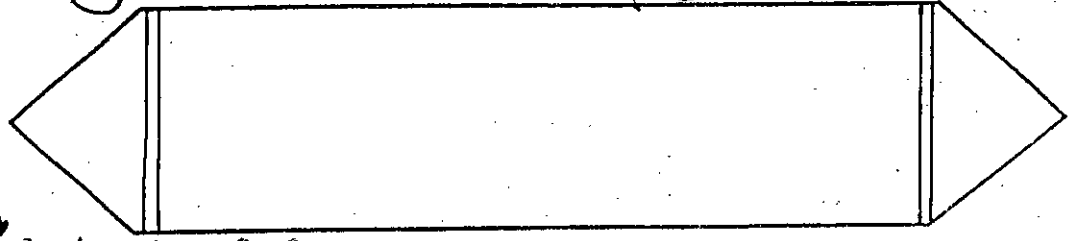

Signature

Instructions :

- Please follow NIH and Department of Health, Khyber Pakhtunkhwa current guidelines for case definition. These information are available on healthkp.gov.pk and NIH.org.pk
- Instructions for sample taking and shipment overleaf

ATTESTED

بعدالت عام خلیفہ کثرتی اسروں کے لئے لکھنا



بنام اسٹریٹ منسٹر جنرل علی صاحب خان
خیات احمد
2020-09-29

موزخہ 29-09-2020
مقدمہ Appeal
دعویٰ Appeal
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ کے لئے لکھنا
آن مقام جسٹس کے لئے مشاہدہ حضور خان / صاحبہ لکھنا
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو رضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھنا یا کہ سند ہے۔

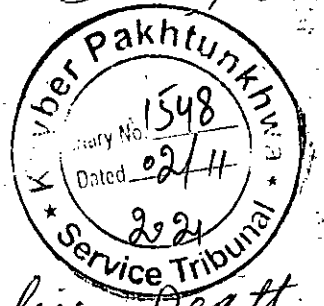
المرقوم 29 - 09 - 2020

Attested & Accepted
کے لئے منظور ہے۔

بمقام جسٹس
لکھنا

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Appeal No. 5191 / 21



Ziyad Ahmad

vs

Police Deptt.

Put up to the worthy chair-man
with appeal.

Application for extension of time/period

for submission of Security & Process fee

2/11/21.

R/S Hewethi:

1. That the above title case is pending adjudication before this august Tribunal which is fixed for hearing on 16.11.2021.

2. That the title appeal was admitted for regular hearing on 4/7/2021.

3. That due to illness of the appellant, Security & Process fee did not submitted within the prescribed period.

It is therefore, most humbly prayed that on acceptance of this application period for submission of Security & Process may very kindly be extended.

Dated: 2/11/2021.

Appellant

Through:

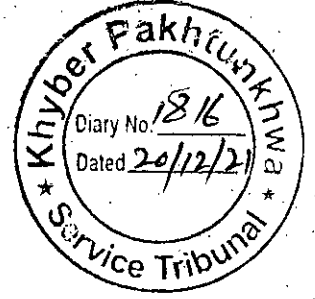
Shahid Mehmood Khan
Advocate

Allowed

1202/11/2021

12/01

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR



In Re:

C.M.No. _____/2021

In

Service Appeal No.5191/2021

*Put up to the worthy chairman
alongwith appeal.*

Ziyad Ahmad. **APPLICANT/ APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**

21/12/2021

Read

APPLICATION FOR WITHDRAWAL OF
THE TITLED APPEAL.

Respectfully Sheweth:

1. That the titled Appeal is pending adjudication before this Hon'ble Tribunal, which is fixed for hearing on 12.01.2022.
2. That since applicant/appellant wants his retirement order to be intact alongwith his pension and commutations, therefore, he is no more interested to pursue the case further, hence this application.

It is, therefore prayed that by accepting this application, the titled appeal may please be withdrawn in the best interest of justice.

Applicant/Appellant
Through

Shahid Mahmood Khan
Advocate High Court(s)

Dated: 20.12.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Re:

C.M.No. _____/2021

In

Service Appeal No.5191/2021

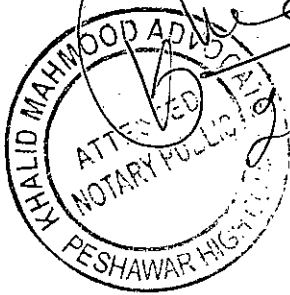
Ziyad Ahmad. **APPLICANT / APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**

AFFIDAVIT

I, Ziyad Ahmad S/o Faqir Khan (Ex-Warder, Central Prison, Peshawar) R/o Village Mirzai, Shabqadar, District Charsadda, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.




DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Re:

C.M.No. _____/2021

In

Service Appeal No.5191/2021

Ziyad Ahmad.....**APPLICANT/APPELLANT**

VERSUS

Inspector General of Prison & others.....**RESPONDENTS**

APPLICATION FOR WITHDRAWAL OF
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Applicant/Appellant
Through



Shahid Mahmood Khan
Advocate High Court(s)

Dated: 20.12.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Re:

C.M.No. _____/2021

In

Service Appeal No.5191/2021

Ziyad Ahmad. **APPLICANT/ APPELLANT**

VERSUS

Inspector General of Prison & others. **RESPONDENTS**

A F F I D A V I T

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DEPONENT