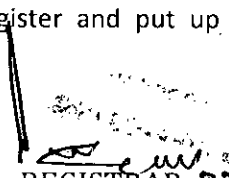
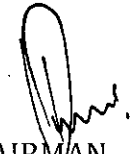
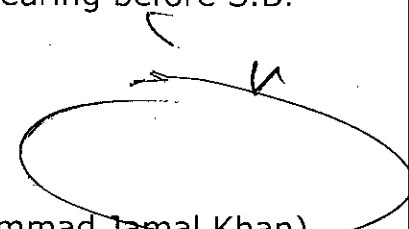


Form- A

# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 11143 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/09/2020	<p>The appeal of Dr. Jamil Ahmad resubmitted today by Mr. Ali Zaman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 22/09/2020</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/10/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
20.10.2020		<p>The legal fraternity is observing strike today, therefore, the case is adjourned to 22.12.2020 on which to come up for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Muhammad Jamal Khan) Member (Judicial)</p>

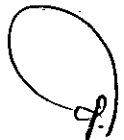
22.12.2020

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 14.01.2021 before S.B.

Annexed with the memo of appeal is an application for interim relief. Notice of the said application be issued to respondents. The operation of impugned order would remain suspended till the next date, if not acted upon earlier.


Appellant Deposited  
Security & Process Fee

  
(Rozina Rehman)  
Member (J)

14.01.2021

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Neither written reply on behalf of respondent submitted nor representative of the department is present, therefore, learned Additional Advocate General is directed to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 03.02.2021 on which date file to come up for written reply/comments before S.B. The operation of impugned order would remain suspended till the next date, if not acted upon earlier.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

03.02.2021

Counsel for appellant and Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Nisar, Assistant, for respondents present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking further time for submission of written reply/comments.

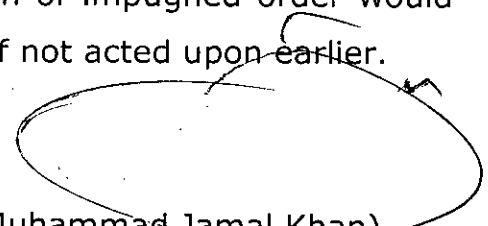
Adjourned to 19.02.2021 on which date file to come up for written reply/comments before S.B. The operation of impugned order would remain suspended till the next date, if not acted upon earlier.

  
CHAIRMAN

19.02.2021

Junior to senior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Saleem Javed, Litigation Officer, for the respondents are also present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking further time for submission of written reply/comments. Last chance is given to the respondents for filing of written reply/comments on 10.03.2021 before S.B. The operation of impugned order would remain suspended till the next date, if not acted upon earlier.

  
(Muhammad Jamal Khan)  
Member

10.03.2021

Nemo for appellant. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Nisar Muhammad, Monitoring Assistant, for the respondent present.

Representative of the respondents could not be able to justify the delay as last chance has already been given for submission of written reply/comments on previous hearing of the case on 19.02.2021. A cost of Rs. 2000/- is therefore imposed on the respondents to be paid before next date of hearing. File to come up for written reply/comments on 26.03.2021 before S.B.

  
(MIAN MUHAMMAD)  
MEMBER (E)

26.03.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG alongwith Habibullah SO for respondents present.

Written reply/comments on behalf of respondents not submitted. Representative of respondents requested for further time to submit written reply/comments. A cost of Rs. 2000/- imposed vide order dated 10.03.2021 is enhance to Rs. 3000/-. To come up for reply/comments on 13.04.2021 before S.B. The operation of impugned order would remain suspended till the next date of, if not acted upon earlier.

  
(Atiq Ur Rehman Wazir)  
Member (E)

13.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 30.04.2021 for the same as before.

  
Reader

30.04.2021

Due to demise of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2021 for the same as before.

  
Reader

25.05.2021

Mr. Abdul Samad Durrani, Advocate is present on behalf of the appellant and has submitted an application seeking withdrawal of the instant appeal with the reason that the appellant having been left with no interest to pursue the same does not want to proceed further. Application is placed on file. In pursuance thereto, this appeal is dismissed as withdrawn. File be consigned to the record.

  
Chairman

ANNOUNCED

25.05.2021

This is an appeal filed by Dr. Jamil Ahmad today on 16/09/2020 against the order dated 21.05.2020 against which he preferred/made departmental appeal/ representation on 19.06.2020 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

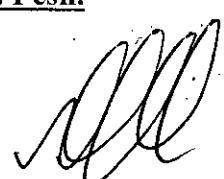
- 1- Page no. 33 and 35 of the appeal are illegible which may be replaced by legible/better one.
- 2- Spare copies submitted with the appeal are incomplete which may be completed.

No. 2687/ST,

Dt. 17/09/2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Ali Zaman Adv. Pesh.

  
All objections removed and  
file be re submitted.  
22/09/2020.

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. \_\_\_\_\_/2020

Dr. Jamil Ahmad , S.M.O (BS-18), Health Department  
Peshawar.

**(Appellant)**

**VERSUS**

Govt Khyber Pakhtunkhwa, through Chief Secretary, Khyber  
Pakhtunkhwa Peshawar and others.

**(Respondents)**

**INDEX**

S. No	Description of Documents	Annexure	Page No
1	Memo of Appeal		1-5
2	Application for suspension of Impugn Notification No.		6-87
3	SOH(HD)/E-V/2-2/2020, Dated: 21.05.2020.	A-1	8
2	Copy of Notification No. 14666-77, Dated: 16.10.2018	A-2	9-18
3	Copy of Departmental appeal	B	19-24
4	Copies of Medical Prescription	C & D	25-30
5	Copy of Notification of Rationalization Policy	E	31-40
6	Vakalatnama.		41

  
Appellant

Through

  
ALI ZAMAN

  
ABDUL SAMAD DURRANI

  
DENNIS MURAD

  
&  
SHAHZAD SHAHID BALOCH

Advocates Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Appeal No. \_\_\_\_\_/2020

Diary No. 10369  
Dated 16/9/2020

Dr. Jamil Ahmad, Senior Medical Officer (BS-18) S/O  
Abdullah Resident of Mohallah Amir Abad, Balogram, Tehsil  
Babo zai, District Swat.

(Appellant)

**VERSUS**

1. The Govt Khyber Pakhtunkhwa, through Chief Secretary,  
Khyber Pakhtunkhwa Peshawar.
2. Secretary Health, Khyber Pakhtunkhwa Peshawar.
3. Director General Health Services, Khyber Pakhtunkhwa,  
Peshawar.
4. Medical Superintendent Saidu Group Of Teaching Hospitals  
at Saidu Sharif, Swat.

(Respondents)

<p align="center"><b><u>APPEAL UNDER SECTION 4 OF THE</u></b> <b><u>KHYBER PAKHTUNKHWA SERVICE</u></b> <b><u>TRIBUNAL ACT, 1974 AGAINST THE</u></b> <b><u>NOTIFICATION NO. SOH(HT)/E-V/2-2/2020,</u></b> <b><u>DATED 21.05.2020, WHEREBY THE</u></b> <b><u>APPELLANT WAS TRANSFERRED FROM</u></b> <b><u>SAIDU GROUP OF TEACHING SWAT TO</u></b> <b><u>CIVIL DISPENSARY BOTA, TRIBAL</u></b> <b><u>DISTRICT MOHMAND, AGAINST WHICH</u></b> <b><u>THE DEPARTMENTAL APPEAL DATED</u></b> <b><u>19.06.2020 WAS INSTITUTED BEFORE</u></b> <b><u>RESPONDENT NO. 02, AND TILL DATE NO</u></b> <b><u>RESPONCE HAS BEEN GIVEN.</u></b></p>
---

Filed to-day

Registrar:  
16/9/2020

**Prayer in Appeal: -**

Re-submitted to -day  
and filed.

Registrar:  
22/9/2020

On acceptance of this appeal the impugned Notification dated 21.05.2020 may please be set-aside/ Cancelled and the appellant may pleased be restored in his own Management Cadre according to prescribed qualification in service as well as at his own station at Saidu Group of Teaching Swat according to Rationalization Policy.



**Respectfully Submitted:**

Compendium of the facts from which the present appeal arises are as under:-

1. That the appellant was initially appointed as Medical Officer (BPS-17) in the Health Department in the year 1995 and later on was promoted to Senior Medical Officer (BPS-18).
2. That after the promulgation of the Khyber PakhtunKhwa Health (Management) Services Rules 2008, the appellant opted for Management Cadre and since then the appellant is serving in Management Cadre.
3. That the appellant has participated in Management Cadre Training Courses up to 03-04 months in department at Provincial Health Services Academy Peshawar, vide Order/ Notification No. 14666-77, dated 16.10.2018. (Copy of Notification is annexed herewith as annexure "A")
4. That after completion of the aforesaid training the appellant resumed the post of senior Medical Officer (Management Cadre) at Saidu Group of Teaching Hospitals Saidu Sharif Swat.
5. That the appellant has perform his duty from his initial appointment with full devotion, zeal and zest and no complaint whatsoever regarding his performance yet by the respondents, which clearly proves that the appellant is hard working and devoted person and all of the sudden without any complaint, Notice, the Respondent No. 02 transferred the appellant from Saidu Group of Teaching Hospitals Swat "Management Cadre" to Civil Dispensary Bota, Tribal District Mohmand "General Cadre" which speaks of the Respondents' mala-fide intention, illegal, Unlawfull, without jurisdiction without law full authority, viod ab initio and ineffective upon the legal and valid rights of the appellant.

6. That it is pertinent to mention here that the appellant was serving in Management Cadre and the Respondent No. 02 has mala-fidely, intentionally transferred the appellant to General Cadre for Civil Dispensary Bota.
7. That the said illegal transfer by the Respondent No. 02 is the result of Political Victimization and may be the result of personal benefits.
8. That the appellant throughout agitated the matter in department by filing application and departmental appeal, but the department remained reluctant and did not bothered to respond till the instant appeal. (Copy of Departmental Appeal is attached as annexure "B").
9. That it is further pertinent to mention here that the appellant is suffering from his frozen Shoulder and get treatment by the specialized physiotherapist, in Saidu shareef from last three months, Moreover, he is also Heart Patient and get treatment since long here in saidu Sharif, if the impugned Notification remain intact appellant will suffer from the dire consequences of life and death. (Copies of Medical Prescription are attached as annexure "C" & "D")
10. That the transfer of the appellant is violation of the rationalization policy of the Government of Khyber Pakhtunkhwa and also against the aim and objectives or spirit of the said rationalization policy in order to improve the health care. (Copy of Notification of Rationalization Policy is attached as annexure "E").
11. That number of the posts of the Management Cadre in (BPS-18) including six posts of DMS Management Cadre is still vacant in Swat Saidu Group of Teaching Hospitals Saidu Sharif, hence the illegal transfer of the appellant to the far flung area which is clear cut violation of laws, rules and the judgments of the superior Courts.

12. That the Notification impugned is liable to be set aside/  
Cancelled inter alia on the following grounds: -

**Grounds of Appeal:**

- A. That the appellant has not been treated in accordance with law, moreover, it is a result of political victimization which resulted in the illegal transfer of the appellant.
- B. That the impugned Notification is illegal, void ab initio, with malafide intentions, without lawful authority, jurisdiction, and ineffective upon the rights of the appellant, hence liable to be cancelled.
- C. That the appellant has been transferred to a post of General Cadre despite the fact that the appellant is the member of Management Cadre of the Khyber Pakhtunkhwa Health Department.
- D. That the appellant is suffering from several chronic diseases and there are no facilities available in the dispensaries of District Mohmand, moreover, no such accommodation provided by the concerned respondents to the appellant.
- E. That the impugned Notification has been issued against the rationalization policy of the Provincial Government of Khyber Pakhtunkhwa, which is gross miss conduct of the authority.
- F. That the transfer and posting on the direction of Chief Minister / Minister and other political figures has been declared illegal time and again by the superior courts.

G. That the appellant has performed his duty with great zeal and devotion, hard work and till date no complaint of the appellant has registered to the respondents, in this regard guidance may be taken from the ACR's of the appellant.

H. That the other grounds will be raised, if any, at the time of arguments, with the permission of this Honble tribunal.

It is therefore prayed that on acceptance of this appeal the impugned Notification No. SOH(HT)/E-V/2-2/2020, dated 21.05.2020 may please be set-aside/ Cancelled and the appellant may please be restored in his own Management Cadre at his own station at Saidu Group Of Teaching Hospital, Saidu Sharif Swat, according to prescribed qualification in service.

  
Appellant

Through

  
ALI ZAMAN

  
ABDUL SAMAD BURRANI

  
DENNIS MURAD

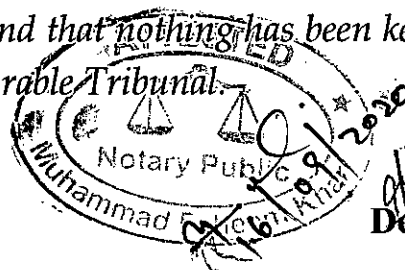
&

  
SHAHZAD SHAHID BALOCH

Advocates Peshawar

#### AFFIDAVIT

I, Dr. Jamil Ahmad, S.M.O (BS-18), Health Department Peshawar, do hereby solemnly affirm and declare that the contents of the above appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



  
Deponent

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. \_\_\_\_\_/2020

Dr. Jamil Ahmad , S.M.O (BS-18), Health Department  
Peshawar.

**(Appellant)**

**VERSUS**

Govt Khyber Pakhtunkhwa, through Chief Secretary, Khyber  
Pakhtunkhwa Peshawar and others.

**(Respondents)**

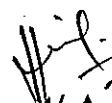
**APPLICATION FOR SUSPENSION OF THE  
IMPUGNED NOTIFICATION NO. SOH(HT)/E-V/2-  
2/2020, DATED 21.05.2020, TILL THE FINAL  
DISPOSAL OF THE INSTANT APPEAL.**

**Respectfully Submitted:**

1. *That the appellant has filed the accompanied service appeal in which no date has been fixed so far.*
2. *That all the grounds raised in the main appeal may kindly be considered as part and parcel of the instant application.*
3. *That the appellant has Prime facie and arguable case, and balance of convenience also lie in favor of the appellant/applicant.*
4. *That if the impugned notification is not suspended, the applicant/appellant will suffer irreparable loss, which cannot be compensated in terms of money or else.*

5. That valuable rights of the applicant/appellant are involved in the case hence the instant application may be allowed, in best interest of the justice.

It is therefore prayed that on acceptance of this application the order of the impugned Notification may kindly be suspended till final disposal of the Appeal.

  
Applicant/ Appellant

Through

  
ALI ZAMAN

  
ABDUL SAMAD DURRANI

  
DENNIS MURAD

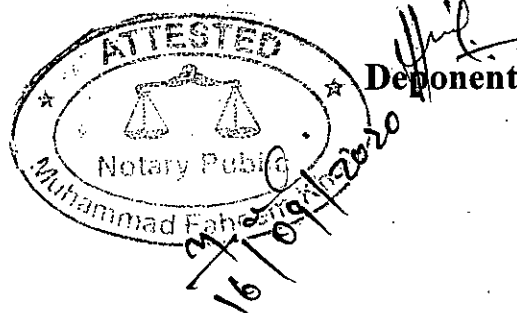
&

  
SHAHZAD SHAHID BALOCH

Advocates Peshawar

#### AFFIDAVIT

I, Dr. Jamil Ahmad, S.M.O (BS-18), Health Department Peshawar, do hereby solemnly affirm and declare that the contents of the above appeal as well as the application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



**GOVERNMENT OF KHYBER PAKHTUNKHWA,  
HEALTH DEPARTMENT.**

Dated Peshawar the 21<sup>st</sup> May, 2020

**NOTIFICATION**

Annexure A-1

The competent authority is pleased to transfer Dr. Jamil Ahmad/ Senior Medical Officer (BS-18) Saidu Group of Teaching Hospital Swat and to post him at Civil dispensary Bota, Tribal District Mohmand against the vacant post, in the public interest, with immediate effect.

NO. SOH(GHD)/E-V/2-2/2020

Endst. Of even No. & Date.

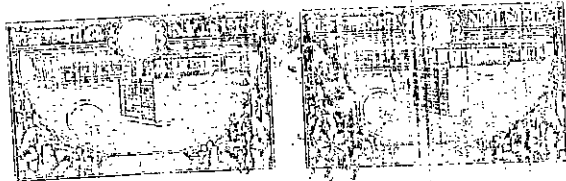
Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Director Health Services, Merged Areas, Peshawar.
4. DHO, Swat.
5. MS, Saidu Group of Teaching Hospital, Swat.
6. DHO, Tribal District Mohmand.
7. DAO, Swat.
8. DAO, Mohmand.
9. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
10. PS to Minister for Health Department, Khyber Pakhtunkhwa.
11. PS to Secretary Health Department, Khyber Pakhtunkhwa.
12. Doctor concerned.

**SECRETARY HEALTH DEPARTMENT**

**Att-Adl  
AYUB KHAN  
Advocate High Court  
& Federal Court**

**(MUHAMMAD IRFAN USMAN)  
SECTION OFFICER (E-V)**



13/6/2020  
22/6/20

DTO

21

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*Annex 'A' 19*

**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR.**

**OFFICE ORDER:**

The following Members of Service BS-18 of Health Management Cadre are hereby nominated/relieved of their duties w.e. from 19.10.2018 for a period of three (03) months to join the mandatory promotional training at Provincial Health Services Academy, Peshawar:-

S.NO.	NAME OF DOCTORS	PRESENT PLACE OF POSTING
1.	Dr. Sardar Ahmad s/o Fatch Muhammad. MBBS, MPH	Bacha Khan Medical College Mardan
2.	Dr. Muhammad Khalil Akhtar s/o Muhammad Yousaf Khan. MBBS, MPH	Deputy Chief HSRU
3.	Dr. Muhammad Saddiq S/O Muhammad Anis. MBBS/MPH	Mental & General Hosp Dadar, Manshra
4.	Dr. Amir Israr S/O Dr. Israr Muhammad. MBBS, MPH	DMS DHQH, Abbottabad
5.	Dr. Syed Ijaz Ali Shah S/O Syed Abdul Qayyum Shah. MBBS/MPH	DHO Office, Manshra
6.	Dr. Muhammad Riaz Tanoli S/O Said Ozar. MBBS/MPH	PD SHP, Peshawar
7.	Dr. Muhammad Shoaib S/O Aziz-ur-Rehman. MBBS/DPH/MPH	DD. PHSA Peshawar
8.	Dr. Wasi Ullah S/O Shukir Ullah. MBBS/MPH	SMO. BHU Umtanzai, Charsadda
9.	Dr. Syed Gul Syed Hussain S/O Syed Shah Jehan Hussain. MBBS/MPH	SMO. RHC Ustrazai, Kohat
10.	Dr. Mohsin Ahmad S/O Taj Muhammad Khan. MBBS/MPH	Coordinator LHWs Program, Charsadda
11.	Dr. Daud Khan S/O Muhammad Rahim Khan. MBBS/MPH	Coordinator EPI, Lower Dir
12.	Dr. Sheikh Muhammad Farooq Azam S/O Sheikh Muhammad Bashir Gulzar. MBBS/MPH	SMO DHQ Hospital, D.I. Khan
13.	Dr. Alamgir Khan S/O Darvesh Khan. MBBS/MPH	At the disposal of DHS FATA
14.	Dr. Jamil Ahmad S/O Abdullah. MD/MPH	SMO SGTH Swat
15.	Dr. Inayatullah S/O Saifullah Khan. MBBS/MPH	SMO at the disposal of DHO DI Khan
16.	Dr. Kamran Yousaf s/o Yousaf Khan. MBBS/MPH	SMO. DHQH, Nowshera
17.	Dr. S. M. Taimur Shah s/o Pir Feruz Shah. MBBS, MPH	DD EPI, DGHS Office, Peshawar
18.	Dr. Alif Jan S/O Amir Jan. MBBS/MPH	SMO CH Shamshatoo FR Peshawar
19.	Dr. Muhammad Shafiq S/O Akbar Gul. MBBS/MPH	At the disposal of DHS FATA
20.	Dr. Abbas Khan S/O Anab Khan. MBBS/MPH	MS CH Darazinda, DI Khan
21.	Dr. Syed Shaida Hussain Bukhari S/O Fida Hussain Shah. MBBS, MPH	Coordinator LHWs Program, DHO Peshawar
22.	Dr. Firdous Jabeen W/O Er. M. Fayyaz Burki. MBBS, MPH	WMO Sifat Ghayur Hosp: Pesh
23.	Dr. Aziz Khan s/o Jalfar Khan. MBBS/MPH	MO, DHQH, Mardan

*9*

**ALI**  
Advocate High Court  
& Federal Shariat  
Court

No 10549/18 dt 25/10/18  
copy to -

① Dr. Jamil Ahmad SMO

② E-I

*MS*

*M. S. Shah*

*CTC*



10

24.	Dr. Muhammad Tahir Khan S/O Faiz Muhammad Khan, MBBS/MPH	At the disposal of DHO Mardan
25.	Dr. Niaz Muhammad S/O Dost Muhammad, MBBS, MPH	DMS Services Hospital, Peshawar
ALTERNATE		
26.	Dr. Saeedur Rehman S/O Haji Fazli Rehman, MBBS, MPH	CD High Court Peshawar
27.	Dr. Muhammad Kamal S/O Muhammad Sharif, MD/MPH	CD Sheikh Maltoon, Mardan
28.	Dr. Muhammad Riaz S/O Gohar Khan, MBBS/MPH	Gaju Khan Medical College, Swabi
29.	Dr. Uzma Habib D/O Taj Muhammad, BDS/MPH	GNBMH Peshawar
30.	Dr. Hammad S/O Said Badshah, MBBS/MPH	SMO, RHC Gulabad, L/Dir

Sd/xxxxxxxxxx  
**DIRECTOR GENERAL HEALTH SERVICES, KPK, PESHAWAR.**

No 14666-77 AE.I, Dated Peshawar the 16/10 /2018  
 Copy forwarded to the:-

1. Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar.
2. Director General, PHSA, Peshawar for information w/ to his letter No.410/Admn/DGHS/6015-16 dated 15.10.2018.
3. Principal, Bacha Khan Medical College, Mardan and Gaju Khan Medical College Swabi.
4. Director Health Service Tribal Districts KP.
5. Director EPI DGHS Office Peshawar
6. Chief HSRU Health Secretariat Peshawar
7. Medical Superintendent SGTH Swat.
8. Medical Superintendent Services Hospital, Peshawar.
9. Medical Superintendent, Sitwat Ghayur Memorial Hospital, Peshawar.
10. Medical Superintendents, DHQH, Abbottabad, DI Khan, Nowshera, Mardan
11. Distt: Health Officers, Manshra, Charsadda, Kohat, Lower Dir, D.I.Khan, Mardan, Peshawar
12. All above named officers with the direction to report to the PHSA on the above mentioned date and in case of any query they may contact on Phone No.091-2614223, 2614225.

*[Signature]*  
 DIRECTOR GENERAL HEALTH SERVICES  
 KHYBER PAKHTUNKHWA PESHAWAR

*C.T.C*  
*[Signature]*

*Attested*  
**ALI ZAHEED**  
 Advocate & Federal Shariat Court



**GOVERNMENT OF KHYBER PAKHTUNKHWA,  
HEALTH DEPARTMENT**

No. E&A/Health/2-65/2019  
Dated: the Peshawar May 17, 2019

To,

1. All Hospital, Medical Directors MTI, Khyber Pakhtunkhwa
2. All District Health Officers, Khyber Pakhtunkhwa
3. All Medical Superintendents, Khyber Pakhtunkhwa
4. Director Health Services, Merged Districts Khyber Pakhtunkhwa

Subject:

**STRICT COMPLIANCE OF DOMICILE/ RATIONALIZATION, BASED  
POSTING/ TRANSFERS OF DOCTORS IN THE HEALTH  
DEPARTMENT.**

Dear Sir,

I am directed to refer to the above noted subject and to say that this department has recently issued posting/ transfer notifications in respect of doctors on domicile/ rationalization basis. In this regard, all the Hospital/ Medical Directors of MTIs and DHOs/ MSs, Khyber Pakhtunkhwa are required to relieve all the doctors who were transferred from MTIs/ other hospitals and subsequently, posted in their respective home districts and stop their salaries/ pays henceforth.

2. I am further directed to convey that all Hospital/ Medical Directors of MTIs, Khyber Pakhtunkhwa should advertise the positions left vacant due to the above posting/ transfers and fill-up the same under their control in the prescribed manner, at the earliest possible.

3. Similarly, all DHOs/ MSs/ DHS merged Districts, Khyber Pakhtunkhwa are required to accept arrival of the reporting doctors transferred from MTIs/ other hospitals and should ensure that they must serve at the place of posting as per notifications without any further internal adjustment.

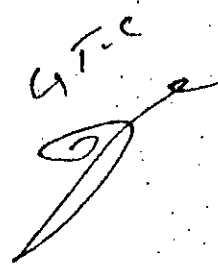
4. All the DHOs/ MSs/ DHS merged Districts, Khyber Pakhtunkhwa are required to report the doctors transferred from MTIs/ other hospitals to this department who fail to join their new assignment within the stipulated time for initiation of disciplinary proceedings under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

  
Section Officer (General)

End: of even No. & Date.

1. Director General Health Services, Khyber Pakhtunkhwa.
2. PSO to Minister for Health, Khyber Pakhtunkhwa.
3. PS to Secretary Health, Khyber Pakhtunkhwa.

  
Section Officer (General)

U.T.C  


Dated Peshawar the 10<sup>th</sup> September, 2018

## NOTIFICATION

No.SOH(E-V)4-20/2018

In Continuation of this Department Notification of even number dated 07<sup>th</sup> May, 2018, the competent authority (Chief Minister Khyber Pakhtunkhwa) is pleased to induct the following doctors of the General Cadre, on their option, into the Health Management Cadre having the requisite qualification.

2. Their inter se seniority will be determined in the new Cadre in terms of Section-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 and Rule-17 of the Appointment, Promotion Transfer Rules, 1989.

S.#	NAME OF DOCTOR	FATHER NAME
1.	Dr.Khan Bahadar BS-19	Gul Akbar
2.	Dr.Muhammad Usman Shah BS-18	Muhammad Zahir Shah
3.	Dr.Shiraz Ahmad BS-18	Rashid Ahmad
4.	Dr.Shaqatullah BS-17	Amir Hamza
5.	Dr.Fayyaz Ali Roomi BS-17	Humayun Roomi
6.	Dr.Muhammad Javed Khan BS-20	Shah Zaman Khan
7.	Dr.Syed Gul Hussain Syed BS-18	Syed Shah Jehan
8.	Dr.Wasiullah BS-18	Shakirullah
9.	Dr.Jameel Ahmad BS-18	Abdullah
10.	Dr.Farman Ali BS-18	Muhammad Naseem
11.	Dr.Waseem Ahmad BS-19	Qazi Muhammad Saleem
12.	Dr.Irfanuddin BS-17	Habibul Mukhtar
13.	Dr.Shaukat Saleem Khan BS-18	Saleem Khan
14.	Dr.Sardar Aurangzeb BS-19	Sardar Muhammad Ashraf
15.	Dr.Shah Faisal BS-19	Ronaq Zaman
16.	Dr.Zahir Shah BS-19	Bahadar Khan
17.	Dr.Irshad Ali BS-17	Muhammad Razaq
18.	Dr.Muhammad Farooq Gul BS-18	Gul Muhammad
19.	Dr.Muhammad Alamgir BS-17	Nisar Muhammad
20.	Dr.Bakht Belaned BS-17	Fazal Rehman
21.	Dr.Khalid Khan BS-17	Shah Muhammad Khan
22.	Dr.Jamaluddin BS-18	Muhammad Din
23.	Dr.Sherin Muhammad BS-17	Bacha Muhammad
24.	Dr.Saeedullah Khan BS-19	Mukarram Khan
25.	Dr.Erum Qayum BS-17	Syed Qayum
26.	Dr.Nazar Muhammad BS-18	Bakht Sar
27.	Dr.Zeeshan BS-17	Said Ali Khan
28.	Dr.Fakhr-e-Alam BS-17	Sultan Room
29.	Dr.Hammad BS-18	Said Badshah
30.	Dr.Muhammad Arif Khan BS-18	Amir Nawaz Khan
31.	Dr.Waqar Ahmad BS-17	Mehboob Ali
32.	Dr.Sagheer Ahmad BS-18	Noor Elahi
33.	Dr.Ikramullah BS-17	Yar Jan
34.	Dr.Muhammad Sadig BS-18	Muhammad Anis
35.	Dr.Humera Semab BS-17	Malik Khan Muhammad
36.	Dr.Kamran Yousaf BS-18	Muhammad Yousaf
37.	Dr.Muhammad Wali Ali BS-17	Muhammad Anam
38.	Dr.Naseeb Gul BS-17	Haseeb Gul
39.	Dr.Muhammad Mudassar Iqbal Khan BS-17	Muhammad Iqbal Khan

*Handwritten signature/initials*

44 of 10  
MAN  
Advocate High Court  
Federal Shariat  
Court

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# CERTIFICATE

These merits & mandates of training for promotion 18 To 19 by assignment

*(Handwritten signatures and stamps)*

14

CHIEF EXECUTIVE OFFICER

CHIEF EXECUTIVE OFFICER

Advocate General  
& Federal Court

PROVINCIAL HEALTH SERVICES ACADEMY

HEALTH DEPARTMENT  
GOVERNMENT OF KHYBER PAKHTUNKHWA

CERTIFICATE OF ACHIEVEMENT

AWARDED TO

DR. JAMIL AHMAD

ON COMPLETION OF

THREE (03) MONTHS MANDATORY PROMOTIONAL COURSE  
FOR MANAGEMENT CADRE (BS-18 TO BS-19)

FROM 28<sup>th</sup> JANUARY 2019 TO 25<sup>th</sup> APRIL 2019

AT

PROVINCIAL HEALTH SERVICES ACADEMY PESHAWAR

Training  
Coordinator  
Peshawar

Director General  
Peshawar

*(Handwritten signature)*



Admission  
& Fee  
Circular

روزنامہ مشرق پشاور اسلام آباد..... (9) 18 جون..... 2020

# 1900 ڈاکٹروں کو اگلے گریڈ میں ترقی دینے کا فیصلہ

ڈاکٹروں کی ترقیاں ایک سال سے تاخیر کا شکار تھیں، ہیلتھ ڈائریکٹوریٹ نے ورکنگ پیپرز سیکرٹریٹ میں جمع کروادئے اور وفاق میں ڈاکٹروں کی حوصلہ افزائی کیلئے انہیں فوری ترقی دینے کی منسوہ بندی کی گئی ہے، ذرائع

پشاور (نیوز رپورٹر) صوبائی حکومت کی جانب سے فیصلہ کیا گیا ہے جس کیلئے ہیلتھ ڈائریکٹوریٹ نے ایک سال سے تاخیر کا شکار ڈاکٹرز کو ترقی دینے کا جزیل اور پیمنٹ کیڈرز کے 19 سو سے زائد ڈاکٹرز کو روادیے ہیں۔ پری پی (بقیہ 75 صفحہ 10)

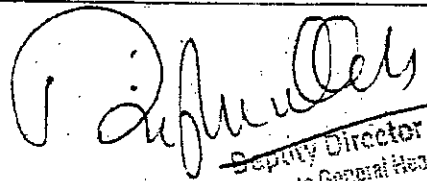
بقیہ نمبر	1900 ڈاکٹر	75
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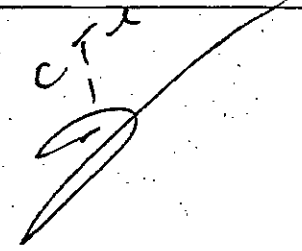
ایس بی کے بعد جولائی میں اس حوالے سے خصوصی اجلاس بلائے کی منصوبہ بندی کی گئی ہے ذرائع کے مطابق گزشتہ جولائی سے اب تک ڈاکٹرز کے مختلف کیڈرز کے ڈاکٹرز کی ترقی کا سلسلہ منقطع پڑا ہے اس سلسلے میں کافی کوششوں کے بعد بھی گزشتہ ہفتے ہونے والی ایس بی میں ڈاکٹرز کے کیس ورکنگ پیپرز تیار نہ ہونے کی وجہ سے پراڈنل سلیکشن بورڈ کے اجلاس کے اجنڈے پر نہیں رکھے گئے لیکن اب ذرائع نے دعویٰ کیا ہے کہ وفاق ایئر جنسی میں ڈاکٹرز کی حوصلہ افزائی کیلئے انہیں فوری ترقی دینے کی منسوہ بندی کی گئی ہے جس کیلئے اگلے ماہ سال یعنی آگست جولائی میں پی ایس بی کا اجلاس بلایا جائے گا جس کیلئے جزیل کیڈرز کی سترہ سے اٹھارہ میں خالی اسامیوں پر 2 سو ڈاکٹرز گریڈ انہیں کیلئے جزیل کیڈرز کے 525 جبکہ گریڈ 20 میں ترقی کیلئے 125 ڈاکٹرز کے ورکنگ پیپرز تیار جبکہ پیمنٹ کیڈرز میں گریڈ انہیں میں 2 سو 6 گریڈ اٹھارہ میں 8 اور گریڈ بیس میں 12 افراد کے ڈاکٹرز کا منسل تیار کیا گیا ہے

promissio to 19 due  
16 in matter of seniority

PROVISIONAL SENIORITY LIST OF MEMBERS OF SERVICES (BPS-18) OF THE HEALTH DEPARTMENT 01-01-02019

Sl: No.	Name of Officer/Official with academic qualification.	Date of Birth and Domicile	Date of 1st entry into Govt: Service	Regular appointment/promotion to the present post.			
				Date	BPS	Method of recruitment/ appointment.	Present appointment with date.
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Dr. Inamullah s/o Maulana Hamidullah, MBBS, DHPM	1.2.1962/ Mardan	6.12.1987	20.08.2001	BS-18	By Promotion	730 days EOL w.e.from 27.07.2013 to 26.07.2015
2.	Dr. Sardar Ahmad s/o Fateh Muhammad, MBBS. MPH	1.1.1962/ Mardan	23.1.1988	16.04.2008	BS-18	By Promotion	Bacha Khan Medical College Mardan
3.	Dr. Nek Dad s/o Aqal Khan, MBBS/M.A.H.M (England)	Khyber Agy/ 04.04.1963	12.04.1989	28.02.2017	BS-18	By Promotion	KTH, Peshawar
4.	Dr. Muhammad Khalil Akhtar s/o Muhammad Yousaf Khan, MBBS, MPH	25.3.1965/ DI Khan	27.11.1998	15.11.2017	BS-18	By Promotion	Deputy Chief HSRU
5.	Dr. Muhammad Saddiq S/O Muhammad Anis. MBBS/MPH.	02-10-67/ Mansehra	11.03.1999	26.09.2017	BS-18	By Promotion	Mental & General Hosp Dadar, Mansehra
6.	Dr. Aamir Israr S/O Dr. Israr Muhammad, MBBS, MPH	21.03.1970/ Peshawar	16-09-2000	26.09.2017	BS-18	By Promotion	DMS DHQH, Abbottabad
7.	Dr. Syed Ijaz Ali Shah S/O Syed Abdul Qayyum Shah. MBBS/MPH	09.05.1973/ Mansehra	16-09-2000	26.09.2017	BS-18	By Promotion	DHO Office, Mansehra
8.	Dr. Muhammad Riaz Tanoli S/O Said Ozar, MBBS/MPH	01.04.1970/ Swabi	16-09-2000	26.09.2017	BS-18	By Promotion	PD SHP, Peshawar
9.	Dr. Muhammad Shoaib S/O Aziz-ur-Rehman, MBBS/DPH/MPH	14.04.1967/ Nowshera	16-09-2000	26.09.2017	BS-18	By Promotion	DD, PHSA Peshawar

  
 Deputy Director (HRM)  
 Directorate General Health  
 Khyber Pakhtunkhwa Peshawar

  
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 Adversely Affecting Court  
 Adversely Affecting Court  
 Adversely Affecting Court





10.	Dr. Wasi Ullah S/O Shakir Ullah, MBBS/MPH	10.01.1971/ Charsadda	16-09-2000	26.09.2017	BS-18	By Promotion	SMO, BHU Umtanzai, Charsadda
11.	Dr. Syed Gul Syed Hussain S/O Syed Shah Jehan Hussain, MBBS/MPH	07.04.1970/ Orakzai Agency	16-09-2000	15.11.2017	BS-18	By Promotion	DMS, LMH, Kohat
12.	Dr. Mohsin Ahmad S/O Taj Muhammad Khan, MBBS/MPH	15.03.1964/ Charsadda	16-09-2000	26.09.2017	BS-18	By Promotion	Coordinator LHWs Program, Charsadda
13.	Dr. Daud Khan S/O Muhammad Rahim Khan, MBBS/MPH	03.04.1968/ Dir	16-09-2000	26.09.2017	BS-18	By Promotion	Coordinator EPI, Lower Dir
14.	Dr. Sheikh Muhammad Farooq Azam S/O Sheikh Muhammad Bashir Gohar, MBBS/MPH	07.05.1964/ D.I.Khan	22.11.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	SMO DHQ Hospital, D.I.Khan
15.	Dr. Alamgir Khan S/O Darwesh Khan, MBBS/MPH	16.04.1962 / Mohmand Agy	23.11.1995 (C) 01.07.2001 (R)	26.09.2017	BS-18	By Promotion	At the disposal of DHS FATA
16.	Dr. Jamil Ahmad S/O Abdullah, MD/MPH	24.04.1967 / Swat	24.11.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	SMO SGTH Swat
17.	Dr. Inayatullah S/O Saifullah Khan, MBBS/MPH	04.03.1962/ DIKhan	24.11.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	SMO at the disposal of DHO DIKhan
18.	Dr. Kamran Yousaf s/o Yousaf Khan, MBBS/MPH	20.4.1960/ Nowshera	27.11.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	SMO, DHQH, Nowshera
19.	Dr. S. M. Taimur Shah s/o Pir Feroz Shah, MBBS, MPH	25.10.1962/ Mardan	27.11.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	DD EPI, DGHS Office, Peshawar
20.	Dr. Alif Jan S/O Amir Jan MBBS/MPH	02.04.1960/ FR Pesh	27.11.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	SMO.CH Zarghun Khel FR Kohat
21.	Dr. Muhammad Shafiq S/O Akbar Gul, MBBS/MPH	18.08.1962/ Khyber Agy	30.11.1995 (C) 01.07.2001 (R)	26.09.2017	BS-18	By Promotion	At the disposal of DHS FATA
22.	Dr. Abbas Khan S/O Ajab Khan, MBBS/MPH	01.03.1963/ DIKhan	29.11.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	AS, FR Tank.

*(Signature)*  
Deputy Director  
Directorate General Health Services  
Khyber Pakhtunkhwa Peshawar

*(Signature)*

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Advocate  
M. H. Khan  
Peshawar

*(Signature)*

*(Signature)*

23.	Dr. Syed Shaida Hussain Bukhari S/O Fida Hussain Shah, MBBS, MPH	28.01.1964/ Peshawar	18.12.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	Coordinator LHWs Program, DHO Peshawar
24.	Dr. Firdous Jabeen W/O Dr. M. Fayyaz Burki, MBBS, MPH	10.09.1964/ Peshawar	21.12.1995 (C) 01.07.2001 (R)	26.09.2017	BS-18	By Promotion	WMO Sifwat Ghayur Hosp: Pesh
25.	Dr. Aziz Khan s/o Jaffar Khan, MBBS/MPH	14.8.1961/ Mardan	24.12.1995 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	MO, DHQH, Mardan
26.	Dr. Muhammad Tahir Khan S/O Faiz Muhammad Khan, MBBS/MPH	08.05.1964/ Mardan	03.01.1996 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	At the disposal of DHO Mardan
27.	Dr. Niaz Muhammad S/O Dost Muhammad, MBBS. MPH	17.04.1969/ Charsadda	24.04.1996 (C) 01.07.2001 (R)	26.09.2017	BS-18	By Promotion	DMS Services Hospital, Peshawar
28.	Dr. Saeedur Rehman S/O Haji Fazli Rehman, MBBS, MPH	01.04.1963/ Dir	23.06.1996 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	CD High Court Peshawar
29.	Dr. Muhammad Kamal S/O Muhammad Sharif, MD/MPH	25.01.1963/ Mardan	09.01.1996 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	CD Sheikh Maltoon, Mardan
30.	Dr. Muhammad Riaz S/O Gohar Khan, MBBS/MPH	20.01.1971/ Swabi	16.09.1996 (C) 01.07.2001 (R)	26.09.2017	BS-18	By Promotion	Gaju Khan Medical College, Swabi
31.	Dr. Uzma Habib D/O Taj Muhammad, BDS/MPH	11.05.1970 Mohmand Ag	11.09.1999 (C) 01.07.2001 (R)	14.11.2017	BS-18	By Promotion	GNBMH Peshawar
32.	Dr. Hammad S/O Said Badshah, MBBS/MPH	15.03.1971/ Dir	18.08.1999 (C) 01.07.2001 (R)	26.09.2017	BS-18	By Promotion	SMO, RHC Gulabad, L/Dir
33.	Dr. Muhammad Munib S/O Sher Ali Khan, MBBS, MPH	01.02.1965/ Swat	10.09.1999 (C) 01.07.2001 (R)	15.11.2017	BS-18	By Promotion	AP SMC, Swat
34.	Dr. Nazar Muhammad S/O Bakht Sar, MBBS/MPH	12.04.1973/ Bajaur Agy	24.01.2002	15.11.2017	BS-18	By Promotion	Coordinator LHWs Program, Upper Dir
35.	Dr. Muhammad Farooq Gul S/O Gul Muhammad, MBBS/MPH	02.09.1965/ FR D.I.K	24.01.2002	15.11.2017	BS-18	By Promotion	DHQ Teaching Hospital D.I.Khan

*[Signature]*  
Deputy Director (HRM)  
Directorate General Health  
Khyber Pakhtunkhwa

*[Signature]*

*[Signature]*  
Advocate in Court  
Court Shariah

*[Signature]*



Annexure "B"

(19)

To,

The Secretary Health  
Govt. of Khyber Pakhtunkhwa,  
At Civil Secretariat Peshawar

*Attested*  
Advocate General Court  
& Federal Shariat  
Court

Subject: Representation/Review in Respect of Transfer  
order of Applicant dated 21/05/2020

INDEX

S.#	Description of Documents	Annexures	Pages
1.	Representation / Review Application along with transfer order dated 21/05/2020	-	1-8
2.	Copy of Notification No. 14666-77 dated 16/10/2018	-	9, 10
3.	Copies of the Prescription and other relevant record		11-16
4.	Copies of the Prescription of the physiotherapy		17
5.	2005, SCMR p. 17, 2010 PLC (C.S) p. 1046		18-25

Applicant

Dr. Jamil Ahmad

Senior Medical Officer  
Management Cadre Saidu Group  
of Teaching Hospital Saidu  
Sharif, Swat

Dated: 18/06/2020



To,

The Secretary Health  
Govt. of Khyber Pakhtunkhwa,  
At Civil Secretariat Peshawar



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Attended  
Advocate General Court  
& Federal Shariat  
Court

Subject: Representation/Review in Respect of Transfer  
order of Applicant dated 21/05/2020

Through: Medical Superintendent Saidu Group of  
Teaching Hospital Saidu Sharif, Swat

Respected Sir,

The applicant submits as under;

- 1) That the applicant is serving presently as Senior Medical Officer in Saidu Group of Teaching Hospital.
- 2) That the applicant belongs to Management Cadre and has also participated in different training courses for the same, including the three months Departmental Training at Provincial Health Services Academy Peshawar vide order / notification No.



14666-77 dated 16/10/2018. (Copy of Notification No. 14666-77 dated 16/10/2018 is attached herewith)

ALI  
Advocate in Court  
& Federal Shariat  
Court

- 3) That now all of a sudden without any complaint or negligence on the part of the applicant, the applicant has been transferred to Civil Dispensary Bota, Tribal District Mohmand vide notification dated 21/05/2020, which is liable to be cancelled inter alia on the following grounds.

Grounds:

- i. That the increment transfer order has been issued in gross violation of the Khyber Pakhtunkhwa Management Services Rules, 2008.
- ii. That the applicant has been transferred to a post of general cadre, despite the fact that applicant is a member of Management cadre of the Khyber Pakhtunkhwa Health



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Department, which is against the judgments of the Supreme Court of Pakistan as well as the High Courts.

Advocate General  
& Federal Shariat  
Court

- iii. That the applicant has disease namely Dilated Cardiomyopathy. It is pertinent to mention that no cure facilities of the disease are available at the place of new posting of the applicant. This new posting will endanger the life of the applicant. (Copies of the Prescription and other relevant record is attached herewith)
- iv. That the applicant is also presently curing his frozen shoulder by way of physiotherapy for three months. The discontinuity of the same will also cause great danger to the health of the applicant. (Copies of prescription are attached herewith)

may be drawn from the reported judgments, reported as 2010 PLC (CS), Page 1046, PLD 1995 Supreme Court, Page 530, SCMR 2005, Page 17.

AAH  
AL  
Advocate  
& Federal Shariat  
Court

viii. That the applicant has performed his duty honestly, promptly and with all his best professional abilities. In this regard guidance may be taken from the ACRs of the applicant.

ix. That many posts of management cadre are laying vacant in District Swat, hence in such a situation the transfer order of the applicant to another far flung area of another district is a mockery of the relevant law and the judgments of the superior courts.

4) That the impugned transfer order was forwarded by MS. Saidu Group of Teaching Hospitals vide

endorsement dated 15/06/2020, hence this representation is well within time.

24  
A. H. Ahmad  
ALI  
Advocate & Federal Shariat  
Court

In light of the above submissions, it is therefore humbly prayed that on acceptance of this representation, the transfer of the applicant dated 21/05/2020 may kindly be withdrawn.

Applicant

Dr. Jamil Ahmad

Senior Medical Officer  
Management Cadre Saidu Group  
of Teaching Hospital Saidu  
Sharif, Swat

Dated: 18/06/2020

Approved  
 ALI M. KHAN  
 Advocate & Federal Shariat  
 Court

~~Annexure~~  
 Annure "C"  
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HAYATABAD MEDICAL COMPLEX PESHAWAR  
 CARDIOLOGY DEPARTMENT  
 ECHOCARDIOGRAPHY

Name: DR JAMIL Age: 52 yrs Date: 12/6/2019  
 Address: Sex: MALE Type: PMD

ADULT				DOPPLER		
#	PARAMETER	Dimension (cm)	Adult	GRADIENT	Peak mmHg	Mean mmHg
1.	Left Ventricular Diameter (end diastole)	6.0	3.5-5.7	Mitral valve		
2.	Left Ventricular Diameter (end systole)	5.3		Tricuspid Valve		
3.	Right Ventricular Diameter	2.4	0.9-2.6	Aortic valve		
4.	Interventricular septal (thickness (diastole))	1.0	0.6-1.1	Pulmonary valve		
5.	Left ventricular posterior wall thickness (diastole)	1.0	0.6-1.1	VSD gradient		
6.	Aortic root diameter	2.6	2.0-3.7	REGURGITATION		
7.	Left atrial dimension	4.1	1.9-4.0	Mitral valve:	+1	
8.	Fractional shortening	15%	30-44%	Tricuspid valve	+1	
9.	Ejection fraction	32%		Aortic valve:		
10.	Mitral valve area		cm <sup>2</sup>	Pulmonary Valve		
11.	VSD size		cm	HAEMODYNAMICS (mmHg)		
				RVSP	30	
				Pulmonary artery		
				Systemic BP		
				Doppler Mitral valve area	cm <sup>2</sup>	

- 2D COMMENTS:**
- ✓ LA is mildly enlarged in size.
  - ✓ LV is enlarged in size with moderately severe impaired systolic function.
  - ✓ LVOT VTI=9.4 cm, LVEDV=209ml, LVESV=130ml, EF=36%, EPSS=2.3cm, LV Tei index = 0.62.
  - ✓ LV relaxation pattern is also abnormal.
  - ✓ RV is normal in size with preserved function. TAPSE=2.0cm.
  - ✓ IVS & PW thickness are normal.
  - ✓ Valves are normal, mild MR, ERO=0.1cm<sup>2</sup>, RV=10ml, mild TR.
  - ✓ No definite ASD/VSD seen. No LA or LV clot seen.
  - ✓ Globally hypokinetic LV.
  - ✓ No pericardial effusion seen.

**CONCLUSION:**

DILATED CARDIOMYOPATHY,  
 MODERATELY SEVERE IMPAIRED LV SYSTOLIC  
 FUNCTION, GLOBALLY HYPOKINETIC LV, MILD MR,  
 TR.

C.T.C

Attested  
ALI AHMED  
Advocate & Federal Shariat  
Court

Prof. Zahid Aslam Awan

PMDC REG # 3979-N

FCPS(Med), FCPS(Cardiology)  
Cardiologist/ Electrophysiologist

~~(26)~~ (26)

Dr. Jamil sb

06/12/19

1/2 (Aug) - (N)  
2018.

TIA,  
CI - Brown now strength  
Today ECG by about 83.

LVSD = 60  
FS = 15%

Dilated cardiomyopathy

1. HOTTW - PAC/AI  
2% Bundle - 225

Synopal attack e  
Black out.

EBG - (N)

Filme  
VM

110/70

Carotid - (N)

چھٹی بروز ہفتہ داتوار

Cardiomyopathy

(1) to Xlepta  
← 20mg

(2) to Spiramide  
← 20

(3) to Carvedilol  
← 3.125

(4) to Ranipace  
← 1.25

(5) to ...

(5) to ENZ-co  
← 5

0346-9216948: رابطہ نمبر: پشاور سید انور میڈیکل سنٹر، ڈگری گارڈن، پشاور۔ پروفیسر زاہد اسلم اعوان کلینک: کمرہ نمبر 220 سید انور میڈیکل سنٹر، ڈگری گارڈن، پشاور۔

C.T.C



**AMMAN**  
 Advocate High Court  
 & Federal Shariat  
 Court



27



**ECHOCARDIOGRAPHY**

AL FALAH MEDICAL COMPLEX,

NEAR OLD NADRA OFFICE, SAIDU SHARIF

0946713492, 03418935693



NAME: JAMIL AHMAD AGE: 52 Y SEX: M DATE: 23/11/2019

PARAMETER	OBSERVED	NORMAL
	(cm)	
Left ventricular diameter (end diastole)	5.9	<5.8
Left ventricular diameter (end systole)	4.5	
Right ventricular diameter	3.0	<2.6
Left atrial diameter	4.5	<4.0
Aortic root diameter	2.5	<3.6
Interventricular septal thickness	1.0	<1.1
Posterior wall thickness	1.0	<1.1
Fractional Shortening	26%	>25%
Ejection Fraction	52%	>50%

DOPPLER				
	Gradient		Vmax/ PHT	Regurgitation
	peak	mean		
Mitral valve				+++
Aortic valve				
Tricuspid valve				
Pulmonic valve				
VSD				
Hemodynamics				
RVSP			Systemic B.P	

**COMMENTS ON 2D AND M-MODE**

MILDLY DILATED LA, LV, OTHER CHAMBERS ARE NORMAL IN SIZE  
 VALVES ARE NORMAL  
 BASEL MID INFERO SEPTAL WALL HYPOKINESIA,  
 NO LA, LV CLOT  
 NO PERICARDIAL EFFUSION

**COMMENTS ON DOPPLER**

MR DOCUMENTED

**FINAL IMPRESSION**

MODERATE MR, RWMA. MILDLY DILATED LA, LV, PRESERVED LV SYSTOLIC FUNCTION

*Handwritten signatures and initials*

Dr. Muthiullah

Dr. Bilal Ahmad

*Attested*  
ALI  
Advocate  
& Federal Court  
Court

*[scribble]*

*[scribble]*

28

*[scribble]*

**HOLTER  
REPORT**

Post Graduate Medical Institute  
Cardiology Department,  
Hayatabad Medical Complex, Peshawar  
092-91-9217140-47



**Name:** Dr. Jamil Ahmad,  
**Recording Start Date/Time:** 12/5/2019 12:33:03 PM

**ID:** 44      **Secondary ID:**      **Admission ID:**  
**Date Of Birth:** 4/24/1967      **Age:** 52 Years      **Gender:** Male      **Race:** Asian

**Address:**      **City:** Swat  
**State:**      **Postal Code:**      **Country:**  
**Home Tel.:**      **Work Tel.:**      **Mobile Tel.:**  
**Email Address:**

**Indications:** Arrhythmia Monitoring      **Medications:**

**Referring Physician:** Prof. Zahid Aslam Awan      **Location:**  
**Procedure Type:** 24 hrs Holter

**Date Processed:** 12/6/2019      **Recording Duration:** 22:26  
**Technician:** Abid      **Recorder:** H3+  
**Analyst:**      **Recorder No:** 113010147523

**Diagnosis:**      **Notes:**

**Conclusions:**  
- Holter study for 23 hours.  
- Average heart rate is 88/min.  
- PAC's observed.  
- Total burdens of PAC's in 23 hours is 2 %  
- No PVC's documented.  
- No significant pause observed.

PAC's

Reviewed by:

*[Signature]*

Signed by:

Date: 12/6/2019

# CHEST PAIN CLINIC

~~29~~ 29

## CASUALTY DEPARTMENT, SGTH SAIDU SHARIF SWAT

Discharge/Referral Form

Advocate Ghariat  
High Court  
& Federal Court

Patient Name: Dr. Jamil Sb S/D/W/O: \_\_\_\_\_

Age: 52 Sex: M Address: Balogram

DOA: 22-11-19 DOD: 23-11-19 Admission No: 5020

Diagnosis: TIA

No	Medications
1	Tab Dispirin 300p x 10. MRI Brain = Normal study
2	ly w/s 1.0 v 3D. Carotid doppler = (N)
3	ly Nootropil 1/0 x 15D. Echo.
4	ly Esson 4p x 10D. Modern MR
5	Dilated LA
6	RWMA scan
7	EF = 52%
8	BCIs = (N)
9	Tab Dispirin 300p. (1) (14) → 2/20 (1)
10	Tab Xplendid 10p. (1) (14) → 3/20 (1)
11	Tab cancer 2.5. (1) (14) → 4/20 (1)
12	Tab Alp 0.5p. (1) (14) → 5/20 (1)

Follow Up: Tab Folic acid 5p. (1) (14) → 6/20 (1)  
ly Nootropil 1/0 (1) (14) → 1 r 1 r 1

Tab Porypeptic 40 (1) (14) → in 10p (1)

Follow up on Monday (25/11/2019)

To be dismissed e Name & Sign of Doctor Dr. Salmar

X-Plended S Lowplat Lowplat Plus

C.T.C

ALAM SYED  
Advocate  
& Federal Court

~~XXXXXXXXXX~~

○

○

30

Annexure "D"

**DR. SYED TARIQ AZIZ**

Physiotherapy  
Technologist  
D.M.P.T (P.I.M.S)  
R.H.M.P (N.C.H)  
D.H.M.S (C.H.M.C)  
Reg No: 57057



Physiotherapy  
Center

Clinic: Saidu Medical  
Center Opp: Central  
Hospital Saidu Sharif  
Mob: 0333-9482212

Name: Dr. Jamil Ahmad Age: 52 yrs Sex: M Date: 03/06/20

Clinical Record

Rx

3/0  
(L)  
Frozen Shoulder

Adv. physiotherapy  
AS referred by Orth Surg

S. W. D.

(L) Shoulder

20 x 3 months

T. N. S.

10 x 3 months

Stretching Exercises  
for Lt Shoulder

Hand Massage  
@ shoulder

Not Valid For Court

کیونکہ: سیدو میڈیکل سنٹر بال تقابل سنٹرل ہسپتال سیدو شریف سوات موبائل: 0333-9482212

C.T.C.

Annexure E

31

Attested  
ALY KHAN  
Advocate General  
& Federal Shariat  
Court



**GOVERNMENT OF KHYBER PAKHTUNKHWA,  
HEALTH DEPARTMENT**

No. E&A/Health/2-85/2019  
Dated: the Peshawar May 17, 2019

To,

1. All Hospital, Medical Directors MTI, Khyber Pakhtunkhwa
2. All District Health Officers, Khyber Pakhtunkhwa
3. All Medical Superintendents, Khyber Pakhtunkhwa
4. Director Health Services, Merged Districts Khyber Pakhtunkhwa

Subject: **STRICT COMPLIANCE OF DOMICILE/ RATIONALIZATION BASED  
POSTING/ TRANSFERS OF DOCTORS IN THE HEALTH  
DEPARTMENT.**

Dear Sir,

I am directed to refer to the above noted subject and to say that this department has recently issued posting/ transfer notifications in respect of doctors on domicile/ rationalization basis. In this regard, all the Hospital/ Medical Directors of MTIs and DHOs/ MSs, Khyber Pakhtunkhwa are required to relieve all the doctors who were transferred from MTIs/ other hospitals and subsequently posted in their respective home districts and stop their salaries/ pays henceforth.

2. I am further directed to convey that all Hospital/ Medical Directors of MTIs, Khyber Pakhtunkhwa should advertise the positions fell vacant due to the above posting/ transfers and fill-up the same under their control in the prescribed manner, at the earliest possible.

3. Similarly, all DHOs/ MSs/ DHS merged Districts, Khyber Pakhtunkhwa are required to accept arrival of the reporting doctors transferred from MTIs/ other hospitals and should ensure that they must serve at the place of posting as per notifications without any further internal adjustment.

4. All the DHOs/ MSs/ DHS merged Districts, Khyber Pakhtunkhwa are required to report the doctors transferred from MTIs/ other hospitals to this department who fail to join their new assignment within the stipulated time for initiation of disciplinary proceedings under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

  
Section Officer (General)

**End: of even No. & Date.**

1. Director General Health Services, Khyber Pakhtunkhwa
2. PSO to Minister for Health, Khyber Pakhtunkhwa.
3. PS to Secretary Health, Khyber Pakhtunkhwa.

  
Section Officer (General)

(32)

Attended  
ALI FARUK AN  
Advocate High Court  
& Federal Shariat  
Court



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar the May 06, 2019

**NOTIFICATION**

**No.SOH(E-V)/4-20/2010 (DHQ,Charsadda)**

In order to fill the maximum vacant posts of Doctor in the health facilities for providing quality health services to the patients at their home Districts, the competent authority is pleased to transfer Dr. Kamran Durrani s/o Bashir Ahmed Senior Medical Officer (BS-18) attached Lady Reading Hospital Peshawar to DHQ Hospital Charsadda against the vacant post of Senior Medical Officer (BS-18) on rationalization basis with immediate effect in the best public interest.

SECRETARY HEALTH  
KHYBER PAKHTUNKHWA

**Endst. of even No. & Date.**

Copy to the

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Hospital Director LRH Peshawar
4. MS DHQ Hospital Charsadda
5. District Health Officer Charsadda
6. District Accounts Officer Charsadda
7. Deputy Director (IT) Health Department.
8. DHIS Cell DG Health Office Peshawar
9. PSO to Minister for Health, Khyber Pakhtunkhwa.
10. Doctor concerned.

Section Officer (E-V)

33

AK-2-1-2  
ALIZAMA  
Advocate  
& Federal Shariat  
Court



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar the 3<sup>rd</sup> May 2019

**NOTIFICATION**

**No SOH-1/HD3-5/2019:** In order to fill the maximum vacant posts of District Specialists (BS-19) in various specialties in the different health facilities, for providing quality health services to the patients at their door step, the competent authority is pleased to transfer **Dr. Amir Taj S/O Shor Dil Khan** Medical Officer (BS-17 qualified Physician) from MII HMC Peshawar to Category-D Hospital Panna Kalay Buner as District Specialist-Medicine (BS-19) in his own pay & scale on devious / rationalization basis, with immediate effect and in the best public interest.

SECRETARY HEALTH  
KHYBER PAKHTUNKHWA

**End of even No. & Date.**

**Copy to the**

1. Accountant General Khyber Pakhtunkhwa
2. Director General Health Services, Khyber Pakhtunkhwa
3. Hospital Director MII HMC Peshawar
4. District Health Officer Buner
5. Medical Superintendent / Incharge of the concerned hospital
6. District Accounts Officer Buner
7. PSO to Minister for Health Khyber Pakhtunkhwa
8. Deputy Director (IT) Health Department Peshawar
9. DHS Cell DG Health Office Peshawar
10. PS to Secretary Health, Khyber Pakhtunkhwa
11. Doctor concerned

Section Officer (E-1)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

---

Dated Peshawar the 3<sup>rd</sup> May 2019

**NOTIFICATION**

**No SOH-1/HD3-5/2019:** In order to fill the maximum vacant posts of Doctor Specialists (BS-18) in various specialists in the different health facilities for providing quality health services to the patients at their door step, the competent authority is pleased to transfer Dr. Amir Taj S/O Sher Dil Khan Medical Officer (BS-17) qualified Physician MTI HMC Peshawar to Category-D Hospital Pacha Kalay Buner, as District Specialist Physician (BS-18) in his own pay & scale on domicile / rationalization basis with immediate effect and in the best public interest.

**SECRETARY HEALTH  
KHYBER PAKHTUNKHWA**

**Endst: of even No. & date.**

Copy to the

1. Accountant General Khyber Pakhtunkhwa
2. Director General Health Services, Khyber Pakhtunkhwa
3. Hospital Director MTI HMC Peshawar
4. District Health Officer Buner
5. Medical Superintendant / Incharge of the concerned hospital
6. District Accounts Officer Buner
7. PSO to Minister for Health Khyber Pakhtunkhwa
8. Deputy Director (IT) Health Department Peshawar
9. DHIS \_\_\_DG Health Officer Peshawar
10. PS to Secretary Health Khyber Pakhtunkhwa
11. Doctors concerned

**Section Officer (E-I)**



(34)

A. Hestach  
Advocate  
& Federal Court  
Chariat  
Court



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar the 12<sup>th</sup> April, 2019

**NOTIFICATION**

**No. SOH-1/HD3-5/2019:** In order to fill the maximum vacant posts of District Specialists (BS-18) in various specialties in the different health facilities, for providing quality health services to the patients at their door step, the competent authority is pleased to transfer Dr. Rizwan Kundi, Medical Officer (BS-17 qualified Urologist) from Institute of Kidney Diseases (IKD) HIAC Peshawar to DHO Hospital Tank as District Specialist Urology (BS-18) in his own pay & scale on domicile / rationalization basis, with immediate effect and in the best public interest.

Note: The Hospital Director and Medical Superintendent of the concerned hospital are requested to forward charge relinquish / charge assumption reports of the above doctors to Health Department immediately.

SECRETARY HEALTH  
KHYBER PAKHTUNKHWA

**Endst: of even No. & Date.**

Copy to the:

1. Accountant General Khyber Pakhtunkhwa.
2. Director IKD (MTI) Peshawar.
3. Director General Health Services, Khyber Pakhtunkhwa.
4. Medical Superintendent DHO Hospital Tank.
5. PSO to Minister Health, Khyber Pakhtunkhwa.
6. District Accounts Officer Tank.
7. Deputy Director (IT), Health Department.
8. PS to Secretary Health, Khyber Pakhtunkhwa.
9. Doctors concerned

Section Officer (E-1)

Better Copy



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar the 08<sup>th</sup> July, 2019

**NOTIFICATION**

**No. SOH-1/HD/3-5/2019:** In partial modification of this Department's Notification bearing No SOH-1/HD/3-5/2019 dated 03-05-2019, the competent authority is pleased to transfer Dr. Amir Taj S/O Sher Dil Khan, Medical Officer (BS-17) from Category-D Hospital Pacha Kalay, Buner to DHO Hospital Buner against the vacant post of SMO (BS-18) in his own pay & scale on domicile / rationalization basis, with immediate effect and in the best public interest.

2- Consequent upon above, the doctor concerned will perform his duties in Medical Unit of the said hospital being a qualified Physician.

**SECRETARY HEALTH  
KHYBER PAKHTUNKHWA**

**Endst: of even No. & Date.**

Copy to the:

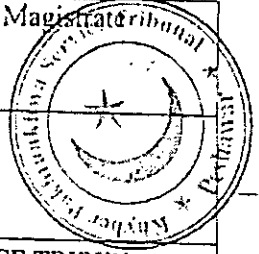
1. Director General Health Services, Khyber Pakhtunkhwa.
2. District Health Officer Buner.
3. Medical Superintendent / Incharge of the concerned hospitals.
4. District Accounts Officer Buner.
5. PSO to Minister for Health Khyber Pakhtunkhwa
6. Deputy Director (IT), Health Department Peshawar.
7. DHIS Cell DG Health Office Peshawar.
8. Section Officers (E-II & V), Health Department Peshawar.
9. PS to Secretary Health, Khyber Pakhtunkhwa.
10. Doctor concerned.

Section Officer (E-I)

Attested  
Advocate High Court  
Federal Shariat  
Court

36

Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
<p style="text-align: center;"><b>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</b> Service Appeal No. 823/2019</p> <p style="text-align: center;">Date of Institution ..... 24.06.2018 Date of Decision ..... 09.08.2019</p> <p>Dr. Hameed Ali S/o Sadaf Ali Agency Surgeon/Merged Area District Kurram.</p> <p style="text-align: right;">Appellant</p> <p style="text-align: center;">Versus</p> <ol style="list-style-type: none"><li>1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.</li><li>2. Secretary Health Department Government of Khyber Pakhtunkhwa, Peshawar.</li><li>3. Director General Health Services Government of Khyber Pakhtunkhwa, Peshawar.</li><li>4. Dr. Moeen Begum AHQ Hospital Parachinar.</li></ol> <p style="text-align: right;">Respondents</p> <p>09.08.2019</p> <p>Mr. Muhammad Hamid Mughal-----Member(J) Mr. Ahmad Hassan-----Member(E)</p> <p style="text-align: center;"><u>JUDGMENT</u> <u>MUHAMMAD HAMID MUGHAL, MEMBER: - Appellant</u></p> <p>present. Learned counsel for appellant present. Mr. Muhammad Jan learned Deputy District Attorney for official respondents present. Private respondent No.4 alongwith counsel present.</p> <ol style="list-style-type: none"><li>2. The appellant "Senior Medical Officer (BS-18)" has filed the</li></ol>		



9.8.2019

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Attested  
ALYIA  
Advocate High Court  
& Federal Shariat  
Court (37)

present service appeal being aggrieved against the order dated 14.03.2019 whereby his transfer from the post of Senior Medical Officer AHQ Hospital Parachinar to the post of Agency Surgeon Merged Area Kurram in place of private respondent No.4, was withdrawn.

3. Learned counsel for the appellant argued that vide order dated 07.03.2019 the appellant was transferred from the post of Senior Medical Officer AHQ Hospital Parachinar to the post of Agency Surgeon Merged Area Kurram however with in a few days of the issuance of the said order the same was withdrawn vide impugned order dated 14.03.2019. Further argued that the impugned order is premature and in utter violation of laws, rules and policy. Further contended that private respondent No.4 has already been posted as Agency Surgeon Merged Area Kurram since 2014 but she is not willing to leave the said post.

4. As against that learned Deputy District Attorney assisted by learned counsel for private respondent No.4, argued that the posting order of the appellant as Agency Surgeon Merged Area Kurram was issued by the incompetent authority. Further argued that the post of Agency Surgeon (BS-18) falls to the share of Health Management Cadre in BS-18 while the appellant belongs to General Cadre and that cross cadre posting is against the Health Management Cadre Service Rules, 2008. Next contended that the transfer posting order dated 07.03.2019 was illegal hence rightly withdrawn.

5. Arguments heard. File perused.

6. There is no dispute that the post of Agency Surgeon is a

28.8.2019

ATTESTED

RYAN M. ABER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Management Cadre Post whereas both the appellant and private respondent No.4 belong to General Cadre.

7. Learned counsel for the appellant could not demonstrate that under the relevant rules, how a Medical Officer/Senior Medical Officer of General Cadre can be appointed against the Management Cadre post. Director Health Services Merged Areas Peshawar has exceeded his authority by issuing transfer posting order dated 07.03.2019 in relation to the appellant (BS-18) and private respondent No.4 (BS-19).

8. In the light of above, the appellant has not been able to seek indulgence of this Tribunal. Consequently the respondent department is directed to appoint suitable officer from Management Cadre, against the post of Agency Surgeon Merged Area Kurram, within 15 days of the receipt of this judgment. The respondent department is further directed to recall all the transfer posting orders of Medical Officer/Senior Medical Officers against the posts of Management Cadre. The present service appeal is disposed of in the above noted terms. Parties are left to bear their own costs. File be consigned to the record room.

(Ahmad Hassan)  
Member

(Muhammad Hamid Mughal)  
Member

Certified to be true copy

MEMBER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

ANNOUNCED Date of Presentation of Appeal 28-8-19  
09.08.2019 Number of Words 1200




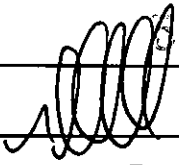
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Urgent 4-00  
Total 20-00  
Name of Copy [Signature]  
Date of Completion of Copy 28-8-19  
Date of Delivery of Copy 28-8-19

پروفیسر ڈاکٹر محمد رفیق صاحب نے پروفیسر ڈاکٹر محمد رفیق صاحب کی طرف سے


پروفیسر ڈاکٹر محمد رفیق صاحب کی طرف سے پروفیسر ڈاکٹر محمد رفیق صاحب کی طرف سے

پروفیسر ڈاکٹر محمد رفیق صاحب نے پروفیسر ڈاکٹر محمد رفیق صاحب کی طرف سے

Al-Hadood  
Jalal


قیمت 50 روپے	9867	 	
ایڈوکیٹ: 			
بار کونسل ایسوسی ایشن نمبر: Bc-10-7765		پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
رابطہ نمبر: 0300 5868244			

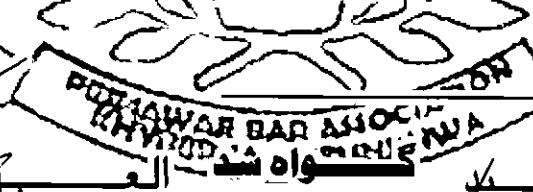
بعدالت جناب: سروس ٹرانسپلینج صاحب ریٹائرمنٹ اور خیبر پختونخواہ

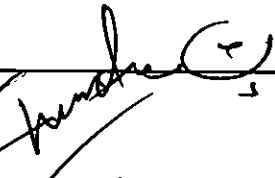
منجانب: <u>ایپلینٹ</u>  چیف پیپریٹری CPK ایٹ حدوٹز	دعویٰ: <u>Appeal</u> علت نمبر: مورخہ: جرم: تھانہ:
<b>باعت تحریر آنکہ</b>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام پشاور ہائی کورٹ علی ذمان و علیہ الصلوٰۃ والہ وسلم کو پیش کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز ذیل صاحب کو  
 راضی نامہ کرہے و تقررات و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا کٹرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اوز وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے نقر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ باختارات حاصل ہوں گے اور ان کا ساختہ پرداختہ 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 تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے

Accepted

  
 Accepted  
 کی منظور ہے



  
 مقام

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

Dr. Jamil Ahmad M.O Health Department Peshawar.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar the 05<sup>th</sup> April, 2021

**NOTIFICATION**

**NO. SOH (E-V)2-2/2021,** Consuquent upon their promotion to BS-19 vide this Department Notification dated 25.01.2021, the Competent Authority is pleased to order posting/ actualization of the following doctors, in the public interest, with immediate effect:-

S.NO	NAME OF DOCTOR WITH BPS	From	To
1.	Dr. Muhammad Khalil Akhtar, Management Cadre (BS-19)	Project Director, HIV, Thalasimla and Hepatitis Control Program, Pakhtunkhwa	Deputy DHO (BS-19), DHO office Charsadda After actualization of his promotion for one day, he will report back to the post of Project Director, HIV, Thalasimla and Hepatitis Control Program, Khyber Pakhtunkhwa
2.	Dr. Muhammad Saddiq, (BS-19)	DHO Kohistan (Lower) In OPS	DHO (BS-19) Kohistan (Lower)
3.	Dr. Muhammad Riaz Tanoli, Management Cadre (BS-19)	Director, Social Health Protection Initiative (SHPI), Peshawar	Director (BS-19), Social Health Protection Initiative (SHPI), Peshawar.
4.	Dr. Wasi Ullah, (BS-19)	MS (BS-19) Cat-C Hospital Tangi Charsadda	Medical Superintendent (BS-19), Cat-C Hospital Tangi Charsadda
5.	Dr. Syed Gul Syed Hussain, (BS-19)	SMO LMH Hospital Kohat	Medical Superintendent (BS-19), Cat-D Hospital Shakardara District Kohat
6.	Dr. Daud Khan, (BS-19)	DHO office Dir (Lower)	MS (BS-19) Cat-D Hospital Monda District Dir (Lower).
7.	Dr. Jamil Ahmad, (BS-19)	SMO, SGTH Swat	Medical Superintendent (BS-19), DHQ Hospital Daggar, Buner.
8.	Dr. Inayat Ullah, (BS-19)	DHO office D.I Khan	MS (BS-19) Cat-D Hospital Paharpur District D.I Khan.
9.	Dr. S.M Taimur Shah, (BS-19)	Deputy Director, EPI DGHS office.	Medical Superintendent (BS-19), Cat-C Hospital Shabqadar.
10.	Dr Abbas Khan, (BS-19)	Deputy DHO FR Belani District Tank	Medical Superintendent (BS-19), DHQ Hospital Tank against the vacant post, while relieving Dr. Alamgir Senior District Specialist (Surgery) from the additional charge of the post of MS
11.	Dr. Syed Shaida, (BS-19)	Deputy Director, PHSA	Director (BS-19), PHSA Peshawar.
12.	Dr. Aziz Khan, (BS-19)	SMO DHQ Hospital Mardan	Medical Superintendent / DDHO (BS-19) THQ Hospital Takhtbai District Mardan.



13.	Dr. Muhammad Tahir, (BS-19)	DHO office Mardan	Medical Superintendent / DDHO (BS-19) Type-D Hospital Kallang District Mardan.
14.	Dr. Saeed Ur Rehman, (BS-19)	MS, DHQ Hospital Batkhele Malakand	Medical Superintendent (BS- 19), Cat-D Hospital Thana District Malakand. After actualization of his promotion for one day, he will report back to the post of Medical Superintendent (BS- 20), DHQ Hospital Batkhela District Malakand in his own pay & scale.
15.	Dr. Muhammad Kamal, (BS-19)	DHO office Mardan	Medical Superintendent Type-D Hospital/ DDHO (BS-19) Rustam, District Mardan.

**Secretary Health**  
**Government of Khyber Pakhtunkhwa**

Endst. of even No. & Date.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Director Health Officer, Peshawar and Mardan, Charsadda, Kohistan (Lower),  
Dir, D.I. Khan, Tank & Kohat.
4. Medical Superintendent, DHQ Hospital Daggar Buner & Tank.
5. Assistant Director (IT), Health Department, with the direction to upload the  
notification on official website.
6. PS to Minister for Health Department, Khyber Pakhtunkhwa.
7. PS to Secretary Health Department, Khyber Pakhtunkhwa.
8. Doctors concerned.
9. Personal Files of the doctors concerned.

  
 05/04/21  
 (Latif-Ur-Rehman)  
 SECTION OFFICER (E-V)

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Misc App No. \_\_\_\_\_/2021  
In  
Appeal No. \_11143/2020

*Dr. Jamil Ahmad, Senior Medical Officer (BS-18).*

.....(Applicant/Appellant)

**VERSUS**

*The Govt Khyber Pakhtunkhwa, through Chief Secretary, Khyber  
Pakhtunkhwa Peshawar & Others.*

.....(Respondents)

**APPLICATION FOR WITHDRAWAL OF THE**  
**TITLED APPEAL.**

**Respectfully sheweth:**

1. That the captioned appeal is pending adjudication before this Honorable Court which is fixed for hearing today i.e. <sup>25</sup> 05.2021.
2. That the appellant has filed the instant appeal before this Honorable Court against the illegal transfer of the appellant from Saidu Group of Teaching Hospital Swat to Civil Dispensary BOTA, Tribal District Mohmand.

3. That the appellant has promoted to BPS-19 in this regard a Notification was issued bearing Notification No. SOH (E-V)2-2/2021, on 05.04.2021.

(Copy of Notification is attached as Annexure "A")

4. That the appellant has left no interest in the instant appeal being infructuous and to further proceed the case is just the wastage of precious time of this Honorable Court, Therefore, the appellant do not want to pursue the case further.

5. That there is no legal bar on acceptance of this application rather the law and justice demand the same.

*It is therefore, humbly prayed that on acceptance of the application in hand the case of the appellant may kindly be withdrawn for the best interest of justice.*

Applicant / Appellant

Through

  
Ali Zaman

&

  
Abdul Samad Durrani

Advocates

High Court Peshawar