





Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 108/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/01/2022	<p>The appeal of Mst. Nargis Maseeh resubmitted today by Mr. Imran Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	7-3-2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>07/03/22</u>:</p> <p> CHAIRMAN</p> <p>Due to retirement of the Honorable chairman the case is adjourned to come up for the same as before on 6-6-22</p> <p> Reader</p>
	06.06.2022	<p>Junior counsel for the appellant present.</p> <p>Lawyers are on general strike, therefore, case is adjourned to 27.07.2022 for preliminary hearing before S.B.</p> <p> (Rozina Rehman) Member (J)</p>

J-3-2052

the
is
the

Due to activation of
the people chairman the case
is adjourned to come up for
report on P.C. 2-22


✓
R. C. ...

The appeal of Mst. Nargis Maseeh w/o Didldar r/o Mohallah inventory Colony Forest College Peshawar received today i.e. on 17.01.2022 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal. ✓
- 2- Annexures of the appeal may be attested. ✓
- 3- Memorandum of appeal may be got signed by the appellatant. ✓
- 4- appeal has not been flagged/marked with annexures marks. ✓
- 5- Copy of pay bill and service certificate mentioned in para-2 of the memo of appeal (Annexure-B) is not attached with the appeal which may be placed on it.
- 6- Copy of application for release of salaries mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.
- 7- Copy of departmental appeal (Annexure-G) is incomplete which may be completed. ✓
- 8- Copy of order dated 06.01.2022 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 9- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 10- Page Nos. ~~22, 26, 53, 54 55 & 64~~ of the appeal are illegible which may be replaced by legible/better one.

No. 110 /S.T,

Dt. 17/01 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Imran Khan Adv. Pesh.

Object (5) - Pay bill & service certificate not necessary so deleted.

Object 6

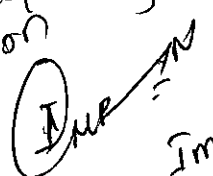
copy of salary are attached on page 34-35

Object 8

The said order is attached as Annex (J) dated 06-1-2022

(10) objection

22-26 & 55 pages delet being not necessary - page 53 & 54 become 43 & 44 & its better copies on page 45-46 and page 64 become 57 having better copy on 58


 Imran Khan
 Adv. Peshawar

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: NARGIS MASEEH VS F D- OFFICER & OTHERS

S#	CONTENTS	Yes	No
1.	This Appeal has been presented by <u>Counsel (Khan Adil)</u>	✓	
2.	Whether counsel / appellant / respondent / deponent have signed the requisite document?	yes	
3.	Whether appeal is within time?	Yes	
4.	Whether appeal enactment under which the appeal is filed is mentioned?	yes	
5.	Whether enactment under which the appeal is filed is correct?	Yes	
6.	Whether affidavit is appended?	Yes	
7.	Whether affidavit is duly attested by competent oath commissioner?	yes	
8.	Whether appeal / annexure are properly paged?	yes	
9.	Whether certificate regarding filling any earlier appeal in the subject, furnished?	Yes	
10.	Whether annexures are legible?	yes	
11.	Whether annexures are attested?	yes	
12.	Whether copies of annexures are readable/ clear?	yes	
13.	Whether copies of appeal is delivered to AG/ DAG?	yes	
14.	Whether Power of Attorney of the counsel engaged is attested and signed by Petitioner/ Appellant/ Respondents?	yes	
15.	Whether number of referred cases given are correct?	yes	
16.	Whether appeal contains cutting / overwriting?	yes	
17.	Whether list of books has been provided at the end of the appeal?	yes	
18.	Whether case relate to this Court?	yes	
19.	Whether requisite number of spare copies are attached?	yes	
20.	Whether complete spare copy is filed in separate file cover?	yes	
21.	Whether addresses of parties given are completed?	yes	
22.	Whether index filed?	yes	
23.	Whether index is correct?	yes	
24.	Whether security and process fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rule 1974 rule 11, Notice along with copy of appeal and annexure has been sent to respondents? On _____	yes	
26.	Whether copies of comments / replay/ rejoinder submitted? On _____	yes	
27.	Whether copies of comments / replay/ rejoinder provided to opposite party? On _____		

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name:- Imran Khan Adil

Signature:- (Signature)

Dated:- 25-1-2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. 108 /2022

Nargis Maseeh

VERSUS

Divisional Forest Officer and others

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Dated: 17/01/2022

Through

Appellant

Imran Khan

Advocate, High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. 108 /2022

*Nargis Maseeh W/o Dildar R/o Mohallah Inventory Colony Forest
College Peshawar.*

... APPELLANT

VERSUS

1. *Divisional Forest Officer-1 Forestry Planning and Monitoring Circle Peshawar.*
2. *Conservator of Forest Forestry Planning and Monitoring Circle Peshawar.*
3. *Secretary of Forestry planning and Monitoring Circle Peshawar.*

...RESPONDENTS

APPEAL UNDER SECTION 4 OF THE SERVICES
TRIBUNAL ACT 1974, AGAINST THE IMPUGNED
ORDER DATED 16/06/2021 ISSUED BY THE GOHAR
ALI DIVISIONAL FOREST OFFICER-1 FORESTRY
PLANNING AND MONITORING CIRCLE PESHAWAR
WHEREBY THE APPELLANT NAMELY NARGIS
MASEEH HAS BEEN COMPULSORY RETIRED FROM
HER SERVICE AND THE ORDER OF VACATION OF
RESIDENTIAL GOVERNMENT QUARTER DATED
06/01/2022

Prayer:

ON ACCEPTANCE OF THE INSTANT APPEAL THE
IMPUGNED COMPULSORY RETIREMENT ORDER
OF THE APPELLANT DATED 16/06/2021 AND
ORDER OF VACATION OF RESIDENTIAL
GOVERNMENT QUARTER DATED 06/01/2022 BY
THE RESPONDENTS BE SET ASIDE AND THE
APPELLANT BE ALLOWED TO CONTINUE ON
WITH HER SERVICES AND THE SALARIES OF THE
APPELLANT MAY KINDLY BE RELEASED WITH ALL
BACK BENEFITS

RESPECTFULLY SHEWETH,
THAT THE APPELLANT SUBMITS AS UNDER

1. *That the appellant is a peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the constitution of Islamic republic of Pakistan 1973.(Copy of the CNIC is attached as annexure A).*
2. *That briefly stated the fact relevant for the purpose of this petition are that the appellant was appointed as sweeper on 29/06/1994 in respondents department and latter on was joined his duty on 01/07/1994.(Copy of the Employees Profile, Pay Bill and Service Certificates are attached as annexure B).*

3. That after appointment, the appellant was being competent for the said post, performed her duties with great zeal and zest and with full devotion with no complaint whatsoever by any means.
4. That being regular employee the appellant was performing her duty on her respective post with good results and was giving outstanding performance since last 26 years meanwhile in the year 2002 the appellant was became ill and suffering from several diseases i.e. diabetes etc, she has informed her high ups regarding her illness and she was performing her duty with full devotion.
5. That as the appellant is being honest and is regularly performing her duties with ill health, furthermore in the year 2019 the respondents had stopped the salary of the appellant, in this respect the appellant also moved applications for release of her salaries, moreover appellant in the year 2020 applied for her medical board as she was feeling not well, the doctor has advised the appellant that "keeping in view the complication refer to medical board for retirement" and keeping in view the prospect of recovery she is referred to be boarded out on medical grounds", thereafter the appellant submitted many applications to her high ups for her medical board and medical bed rest, but with no fruit full result. (Copies of Medical

report, application for medical board and application for releasing of salaries are attached as annexure C).

6. That the appellant was still performing her duties with critical situation and recently the appellant was came into knowledge that she is suffering from Covid-19 due to which she approached for her medical and all tests were positive and the doctors concerned was advised for the complete bed rest and also advised for medical board to be boarded out on medical ground, thereafter the appellant filed several applications along with her medical record, but in vain. (Copy of all the medical record of the appellant are attached as annexure D).

7. That despite of above mentioned facts and circumstances the respondents had illegally and malafidely issued show cause notice to the appellant for willful absence from official duty thereof, on 21/04/2021 and the appellant duly submitted the reply of the show cause notice and annexed all the application and all medical record but the respondents were going to illegally terminated the services of the Appellant.(Copy of Show Cause Notice and reply of Show Cause Notice are attached as annexure E).

8. That thereafter the appellant filed a writ petition No.2117-P/2021 before the Hon'ble Peshawar high court Peshawar, in which the Hon'ble Peshawar High Court Peshawar dismissed the writ Petition with the

directions to approach proper forum vide order dated 23/06/2021.

9. That the respondents malafidely and illegally passed the order of compulsory retirement of the appellant from her service. (Copy of the order dated 16/06/2021 is attached as annexure F).
10. That after the compulsory retirement order of the appellant, the appellant filed the departmental appeal against the impugned order dated 16/06/2021 on 08/07/2021 but the same was also dismissed on 15/09/2021. (Copy of the departmental appeal and order dated 15/09/2021 is attached as annexure G & H).
11. That after the dismissal of the departmental appeal the appellant again approached her department and filed a mercy appeal on 17/09/2021 against the dismissal of the departmental appeal but the same has not been decided till dated. (Copy of the mercy appeal is attached as annexure I).
12. That on 06/01/2022 the respondents also issued a notice of vacation of the residential government quarter allotted to the appellant where she is residing with her family. (Copy of the vacation notice is also attached as annexure J).

13. That feeling aggrieved from the impugned order dated 16/06/2021 and 06/01/2022 of the respondents the appellant approaches this honorable court on the following grounds *inter alia*.

GROUND:-

- A. That the appellant is peaceful and law abiding citizen of Islamic republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B. That there exists no other expedient cum expeditious and adequate remedy available elsewhere, hence the instant appeal.
- C. That the fundamental rights of the appellant has blatantly violated by the respondents and the respondents have been discriminated and has been denied his due rights under the constitution of Islamic republic of Pakistan.
- D. That the appellant from her time of 1st appointment till now is performing her duties without any break.
- E. That the vested rights have been accrued in favour of appellant because she was performing her duties efficiently and with devotion and also without any complaint from any quarter so she is to be boarded out on medical grounds.

- F. That the denial of the respondents for not boarded out the appellant on medical ground and instead they issued a show cause notice to the appellant and latter on the appellant has been compulsory retired vide order No. 59 dated 16/06/2021, dismissing the departmental appeal vide dated 15/09/2021 and issuing a notice dated 06/01/2022 of vacation of the residential government quarter allotted to the appellant, which is infringement rights of the appellant as enshrined in the constitution of the Islamic republic of Pakistan 1973.
- G. That as per the dictum and law governing the land, it is a prima facie fact that where a law requires the think to be done, that must be done in a particular manner and not otherwise.
- H. That where the respondents department stands for fairness and transparency then such glaring and mischievous act on their part cannot be over sighted, as the very credibility of respondent department is in doldrums.
- I. That under the mandate of article 4 of the constitution, no one can be treated otherwise than in accordance with law, whereas article 25 postulated that alike are to be treated alike, but here the case is volta-facie and totally different yardstick has been used to treat the appellant.

J. That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

Prayer:

It is, therefore, most humbly prayed that on acceptance of this appeal, the impugned compulsory retirement order No.59 dated 16/06/2021, the notice dated 06/01/2022 of vacation of residential government quarter order may kindly be concealed/set aside and the salary of the appellant may kindly be released.

Interim Relief:-

By the way of interim relief the respondents may kindly be directed for not vacating the Government Quarter issued to the appellant till final disposal of the instant case.

Dated: 17/01/2022

Through **Appellant**
Imran Khan
Imran Khan
Advocate, High Court Peshawar

Certificate: -

Certified that as per instructions of my client no such like writ petition has earlier been filed before this Honourable Court on the subject matter.

Imran Khan
Advocate

List of Books: -

- 1. Constitution of Islamic Republic of Pakistan 1973.
- 2. Case Laws
- 3. Any other book or rule as per need.

Imran Khan
Advocate

(19)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. _____/2022

Nargis Maseeh

VERSUS

Divisional Forest Officer and others

**APPLICATION FOR SUSPENSION OF THE IMPUGNED VACATION
OF RESIDENTIAL GOVERNMENT QUARTER ORDER NO. 2169-E
VIDE DATED 06/01/2022 TILL THE FINAL DECISION OF THE
SERVICE APPEAL.**

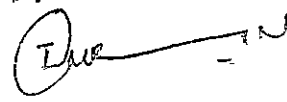
Respectfully Sheweth:-

1. *That the above noted service appeal is being filed before this honorable court in which no date of hearing has yet been fixed.*
2. *That the Appellant has got a good prima facie case in her favour and is sanguine about its success.*
3. *That the balance of convenience also lies in favour of the Appellant.*
4. *That if the impugned vacation of residential Government Quarter order dated 06/01/2022 is not suspended, the Appellant would suffer extreme irreparable loss because the Appellant is a Poor lady and her salaries has already been stopped by the respondents since 2019.*

5. That the facts and grounds of the appeal may kindly be read as an integral part of this application.

It is therefore, respectfully prayed that on acceptance of this application, the impugned vacation of residential Government Quarter order dated 06/01/2022 may kindly be suspended, till the final decision of the case.

Dated: 17/01/2021

Appellant
Through 
Imran Khan
Advocate High Court
Peshawar

(11) (89)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. _____/2022

Nargis Maseeh

VERSUS

Divisional Forest Officer and others

AFFIDAVIT

I, Nargis Maseeh W/o Dildar R/o Mohallah Inventory Colony Forest College Peshawar, do hereby solemnly affirm and declare on oath that the contents of the instant writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

DEPONENT



CNIC # 17301-4149224-6

CELL # 0333-9418596

Identify By:-

Imran Khan



Advocate High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. _____/2022

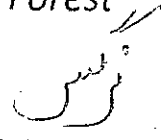
Nargis Maseeh

VERSUS

Divisional Forest Officer and others

ADDRESS OF PARTIES

*Nargis Maseeh W/o Dildar R/o Mohallah Inventory Colony Forest
College Peshawar.*



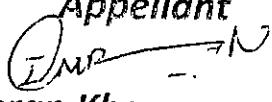
... APPELLANT

1. *Divisional Forest Officer-1 Forestry Planning and Monitoring Circle Peshawar.*
2. *Conservator of Forest Forestry Planning and Monitoring Circle Peshawar.*
3. *Secretary of Forestry planning and Monitoring Circle Peshawar.*

.....RESPONDENTS

Dated: 17/01/2022

Through

Appellant

Imran Khan
Advocate, High Court Peshawar

(12)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Services Appeal No. _____/2022

Nargis Maseeh

VERSUS

Divisional Forest Officer and others

APPLICATION FOR CONDONATION OF DELAY IF ANY

Respectfully Sheweth,

1. *That the captioned appeal, with may be read part and parcel of this application, is pending before this learned forum in with no date of hearing has been fixed.*
2. *That the appellant time and again approached the Respondents to find about the status of her mercy appeal but no information of any sort was given to the Appellant.*
3. *That the appellant had filed her Mercy Appeal which till date has not been replied and the appellant was waiting for its outcome.*
4. *That as such, the appellant seeks its condonation on the aforementioned grounds.*
5. *That this learned forum has always leaned in favour of adjudication on merits rather that technicalities.*

(14)

~~13~~

6. That the appellant is a poor lady and seeks kind indulgence of this learned forum.

It is therefore most humbly submitted that on acceptance of this application the delay in lodging the captioned appeal may most humbly be condoned in the interest of justice.

Dated: 17/01/2022

Through

Appellant



Imran Khan

Advocate, High Court Peshawar

15

Handwritten signature

~~Handwritten mark~~

A



حکومت پاکستان
قومی شناختی کارڈ
17301-4149224-6



نام: نرگس بی بی
جنس: عورت
شہر کا نام: وادی
شناختی علاقہ: پائین وھزار پور
تاریخ پیدائش: 02/11/1964
عشران یوسف مبین
ہسٹو ریجنسٹر ایس ایل

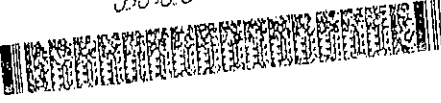
ہسٹو ریجنسٹر ایس ایل

شناختی نمبر: 17301-4149224-6
SSP6XF
موجودہ پتہ: گندھار شہری کالونی ٹارگٹ کولی ایٹار



سنگل پتہ ایٹار

تاریخ اجراء: 02/09/2015
تاریخ ترمیم: 02/09/2025
گنڈھار کارڈ کے برقراری کے لیے ایس ایل میں ڈال دیں



ATTESTED

Annex-1 - SP2

فرگشت

AB

16

16

Employee's Profile						
S.No	Particular		Details			
1.	Service Group	Civil Servant.				
2.	Personnel Number*	Nil.				
3.	Name*	Nargis Bibi				
4.	Father Name/ Husband Name	Dildar				
5.	Marital Status	Married				
6.	Domicile	Peshawar				
7.	Date of Birth*	02-11-1964				
8.	Land Line#	091-9221240				
9.	Mobile*	0332-9914262				
10.	CNIC*	17301-4149224-6				
11.	Date of Joining Service*	01-07-1994				
12.	Present Address	Forest Inventory Colony University of Peshawar.				
13.	Permanent Address	As Above.				
14.	Photo in Soft Form					
Bank Account Information						
15.	Bank Name	HBL	Account Title	Ahmad Jan		
16.	Branch Name	Agriculture University Peshawar Branch	Branch Code	1487		
17.	Account Number	14870007573901	IBAN	Pk52habb14870007573901		
18.	Address	Agriculture University Peshawar.				
Qualification Information						
15.	Qualification Level	Subject	Institute	From Date	To Date	Country
	Nil	Nil	Nil	Nil	Nil	Nil
Training Details						
16.	Training Title	Details / Brief Description	Start Date	End Date	Country	
	Nil	Nil	Nil	Nil	Nil	



ATTESTED TO BE TRUE

ATTESTED TO BE TRUE COPY

A.T.C

17

14

Dependents List

17	Dependent Name	Marital Status	Relation with Employee	Date of Birth	Income / Occupation	Entitle for pension (Yes/No)
1	Dildar	Married	Husband	28-10-1962	-	Yes
2	Samina	Married	Daughter	01-03-1979	-	-
3	Saima	Married	Daughter	25-10-1980	-	-
4	Anne	Unmarried	Daughter	13-01-1982	-	-
5	Junaid Saqib	Married	Son	17-02-1987	-	-
6	Jawad Zaki	Married	Son	03-05-1989	-	-

Service History

18	Department Type	Province	Department	Designation	BPS	Joining Date	Joining Type	Scheduled / Non-Scheduled	Remarks
1	Forestry Planning & Monitoring Circle, Peshawar	Khyber Pakhtunkhwa	Forestry Planning & Monitoring Circle, Peshawar	Sweeper	01	01-07-1994	-	-	-
2	-do-	-do-	-do-	-do-	02	01-07-2007	-	-	-
3	-do-	-do-	-do-	-do-	04	02-12-2015	-	-	-

ATTESTED TO BE TRUE COPY

A.T.C
ATTESTED TO BE TRUE COPY

(25)

34



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, DISPENSARY
Ph: +92 91 9221231 Fax: +92 91 9221233



Name of Patient Nargas
OPD No. 3049 Date 23-4-2021
Disease AD
Age _____ Sex RBS

Clinical History:

10/F
120/80

- URINE R/T
- BS CRP
- COVID-19
Rapid antigen

تشریح آلودگی جوڑ
بالمقابلہ ڈیٹیل سٹور
091-3024755

19

24

30

CRP CASH RECEIPT
CMH PESHAWAR

Date: 23/4/21 No. 93324

Name: CNE Narges

S/O, D/O, W/O:

Age: 55yr Sex: F

Address: Tel: 0334-5094053

Physician: Disease:

Investigation done	Charges
1. <u>COVID-19 PCR</u>	Rs. <u>500/-</u>
2. <u>CP</u>	Rs. <u>530/-</u>
3.	Rs.
4.	Rs.
5.	Rs.
6.	Rs.
7.	Rs.

Total Amount to be Paid Rs. 5530/-

(In words) Five thousand Five hundred
Twenty

20

26

20

CONFID

PAFM-1316(CS)

MED CASE SHEET

(See instr 52 of Regs for Med Svcs of Armed Forces Vol II-1978)

Serial No. in admission and disch book _____ CMH Peshawar

No. _____ Rank _____ Name _____

Unit _____ Age _____ Svc _____

Disease _____

Date	Condition of Admission and progress of case. (Incl Complaints, present, past history, family and personal history, clinical exam, investigation and their results and the treatment prescribed. Progress report will be written as often as is nec)
------	--

23/4/19

H/O - fever - 06 days
 H/O cough, sputum & wheezing

HIST. CHRS

→ PCR of COVID-19

TAB AMELOX 400mg - 007
17070

TAB Pilocate 4mg - 031
17113

Pen Paracetamol - 001
17171

Blood CS

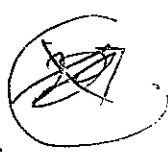
Urea Cr

Col.
IMRAN KHAN
 Classified Medical Specialist

CONFID

21

0333-9083503



CMH PESHAWAR

REQUEST FOR CT SCAN EXAMINATION

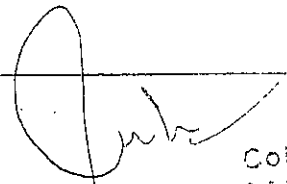
M/O

- 1. No. Rank & Name: JSS04154 Maj Naseem Naz
- 2. Age: 55yrs 3. Unit CMH PSC 4. Ward / OPD OPD
- 5. Nature of Disease:- Fever 7-06 days

- 6. Part to be examined:- HRCT CHEST
- 7. What is to be seen on CT: _____
- 8. H/O any allergic disease / reaction: _____
- 9. Previous CT & USG findings:- _____

5042

Date: _____


IMRAN KHAN
 Col
 Classified Medical Specialist
 CMH Peshawar

Signature & Stamp of
Classified Specialist

(No form will be accepted without above information)

- 10. For CT Scan appointment Time: _____ Date: _____
- 11. Urea: _____
- 12. Creatinine: _____

CT Technician: _____

22



NOT VALID FOR LEGAL PURPOSE

تعطیل بروز اتوار

091-2571133
0336-3161654 رابطہ

پروفیسر محمد نور وزیر

ایم بی بی ایس (گولڈ میڈلیسٹ) ایم آر سی پی (برطانیہ) ایف آر سی پی (ایڈمیرا)

میڈیکل پیتھالوجسٹ اینڈ نیفرالوجسٹ

پروفیسر اینڈ ہیڈ آف دی ڈیپارٹمنٹ (میڈیسن) حیات آباد میڈیکل کیمپلکس پشاور میڈیکل اے وارڈ

PMDC, Regd No: 5513 - N

No. 19

17 MAR 2020

Name _____ Age _____ Sex _____ Date _____

160/90 171/80 - Hi: Du. OA. Di. GBA. SOB

Dr. Muhammad N. Z. M.D. M.P.H. M.C.P. M.C.S. M.C.S. M.C.S.

23

(3/4)

108

HERIATABAD MEDICAL COMPLEX PGMU PESHAWAR
 CARDIOLOGY DEPARTMENT
 ECHOCARDIOGRAPHY

PATIENT NAME	MR. S. BILAL	AGE	YEARS	SEX	FEMALE
DATE	17 March 2016	ADDRESS			

Parameter	Dimension	Adult
Left ventricular diameter (cm)	4.0	3.5-5.5
Left ventricular diameter (cm)	2.8	
Right ventricular diameter (cm)	2.0	0.9-2.6
Inter-ventricular septal thickness (cm)	1.2	0.6-1.1
Left ventricular wall thickness (cm)	1.1	0.6-1.1
Aortic diameter (cm)	2.2	2.0-3.7
Left atrial diameter (cm)	3.7	1.9-4.3
Tricuspid diameter (cm)	3.0	2.6-3.7
Ejection fraction (%)	60%	
Mitral valve area (cm ²)		cm ²
RVSP (cm)		cm

2D

GRADIENT	Peak mmHg	Mean mmHg
Mitral valve		
Tricuspid Valve		
Aortic valve		
Pulmonary valve		
VSD gradient		
REGURGITATION		
Mitral valve		
Tricuspid valve		
Aortic valve		
Pulmonary Valve		
HAEMODYNAMICS (mmHg)		
RVSP		
Pulmonary artery		
Systemic BP		
Doppler Mitral valve area		cm ²

COMMENTS

LA is normal size.
 LV is normal size with preserved systolic function.
 RV is normal size with preserved size to
 normal function.
 No significant valvular abnormalities seen.
 No pericardial effusion.
 No pulmonary embolism.

APPLICABLE RECOMMENDATIONS

Follow up as advised.

CONCLUSION

PRESERVED LV SYSTOLIC FUNCTION

24

~~23~~

~~27~~

MEDICAL TEACHING HOSPITAL PESHAWAR, KP
Hayatabad Medical Complex

Appointment Time : 10:48

MEDICAL-A - OPD

Token# 206

NARGIS BIBI
WILDAR

55 Years

Female

Invoice # K01201182596
Amount Paid : 20 00

Serial # 287279

NO100000108297

Print Date : 17-MAR 20 10 49 36

R

Presenting Complaints

D.W. HT

D. Nephropathy

180/100
Past Medication History

1- Sentence Same

2- Ref for 10 day

3- She has advanced
complication & can
be bonded out
medical ground

[Signature]

Prof. M. Noor Wazir

MBBS (Gold Medalist) MRCP (ENG)
Medical Specialist & Nephrologist

of Peshawar

(85)

(22)

(40)



MEDICAL TEACHING INSTITUTION PESHAWAR, KP
Hayatabad Medical Complex

Appointment Time : 12:24

MEDICAL-B - OPD

Token# 312

NACGS B/BI

57 YEARS

Invoice # K0100166451
Amount Paid 20.00

1100060106287

Serial # 283192

Print Date : 16-MAR-20 11:18:14

Presenting Complaints

SCB - NY/11
Sore throat
Cough

R
TZAM
(+TN)

Remarks

Past Medication History

15/11/19
18/11/19
Sib 97
Tab 128
12/1/20

Tab Gabapentin 300mg
Sib - 1000
Tab Silvair
Sib - 1000
Tab Acetrapid
Sib

Investigations

18/11/19

Diagnosis

CPSC
COP
Department of ENT
3/1/20
AFTS
C/INE

Advise - Complete Bed Rest
Three days as of 17/3/2020

Plan

Reason For Referral

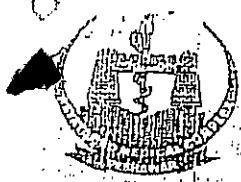
Dr. G. Farooq
MBBS, FCPS (Med)
SPR, MBW, BMC

(26)

Annex 20

17

25



ACCIDENT & EMERGENCY DEPARTMENT

MEDICAL TEACHING INSTITUTION PESHAWAR, KP
Hayatabad Medical Complex

Serial # 311316

Patient: EME00226489

NARGIS BIEL

55 Year / Female

Father/Husband:

Date: 08 APR 2016 18:04

Invoice #: KUT201299940

Receipt #: KUT200625024

Presenting Complaints	R	Remarks
<p>DM HT Hypertension</p>	<p>Controlling blood sugar - Rest for 15 days - keeping in view the - complications refer to - medical board for - retirement</p>	
Past Medication History		
Investigations		
Diagnosis		
Plan	Reason For Referral	

[Signature]
Prof. M. Noor Wazir
 MBBS (Gold Medalist) MRCP (ENG)
 Medical Specialist & Nephrologist

[Signature]
 ATTESTED
 TO BE TRUE COPY

A.T.C

[Signature]
 ATTESTED
 TO BE TRUE COPY
 Stamp & Signature of prescriber

27



ACCIDENT & EMERGENCY DEPARTMENT

MEDICAL TEACHING INSTITUTION PESHAWAR, KP
Hayatabad Medical Complex

~~18~~

20

DATE OF ADMISSION

CLINICAL HISTORY

REASON FOR REFERRAL

EXAMINATION

TREATMENT GIVEN

Presenting Complaints

DM re
complications

Past Medication History

Investigations

Diagnosis

Plan

Reason For Referral

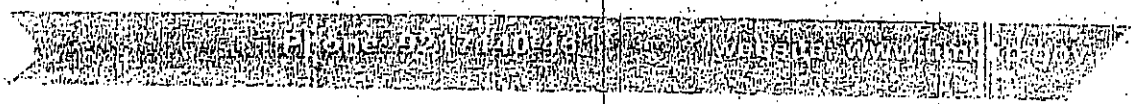
Remarks

Ref for DM re

[Signature]
Prof. M. Noor Wazir
MBBS (General Medicine), MRCP (UK)
Medical Specialist & Lecturer

[Signature]
ATTESTED
TO BE TRUE COPY

[Signature]
ATTESTED
TO BE TRUE COPY





ACCIDENT & EMERGENCY DEPARTMENT

MEDICAL TEACHING INSTITUTION PESHAWAR, KP
Hayatabad Medical Complex

Patient: EMER00297934 Name: Bibi 55 Year Female
Father/Husband Date of Admission: 02/02/2022
Invoice #: Recd. #: 000000000000

Presenting Complaints	R _x	Remarks
<p>DM. HT Hypertension 180/100</p> <p>Past Medication History</p>	<p>Continue Same Treatment</p>	
<p>Investigations</p>	<p>keeping in view the prospect of recovery she is referred to be boarded out on medical grounds.</p>	
<p>Diagnosis</p>		
<p>Plan</p> <p>ATC</p>	<p>ATTESTED TO BE TRUE COPY Reason for Referral</p>	<p>ATTESTED TO BE TRUE COPY</p> <p>Prof. M. Noor Wazir MBBS (Gold Medalist) MRCP (ENG) Medical Specialist & Nephrologist</p>

(29) (18) (33)

MEDICAL TEACHING INSTITUTION PESHAWAR, KP.
Hayatabad Medical Complex

~~205~~

Appointment Time : 10:48

MEDICAL-A - OPD

Token# 206

MARGIS BIBI

55 Years

Female

Invoice #

10000000000000000000

100100000108297

Serial # 287279

Amount Paid

20.00

Print Date 17-MAR-20 10:49:33

R

Presenting Complaints

DM: HT

D. vertigo

180/100
Medication History

Continued Same

Ref for 10 day

*She has continued
complication & can
be. bordered out
medical ground.*

Investigation

[Signature]

[Signature]

A.T.C
ATTESTED TO BE TRUE COPY

Director
Medical Specific & Apparatus

ATTESTED TO BE TRUE COPY

30

28

27

گنت ماسٹری صاب
انوائٹڈ ٹاؤن شپ ڈیولپمنٹ اتھارٹی
باوسط رجسٹرڈ ایف او سب
FMC نمبر

ضابطہ

گزارش کے ساتھ FMC سے گنت ماسٹری کی خدمت کرائی
دے رہی ہے۔
حد ساتھ ہمارے ادارہ کی شہادت سے ڈیٹا کر رہی ہے
آپ سے ایس سے ایس میری فریئر ساتھ حد تک
سندھ کے رجسٹرڈ ایف او کے
حضور کی گزارش کریں

الگارینہ سٹریٹنگس لیوی 7% دلدار
سٹیٹری ڈسٹر
22/7/2020

Let Environment EP
Recommendation to
consider the application
Please

WAZIR ZADA
Special Assistant
CM on Minority Affairs
Hyderabad, Khyber Pakhtunkhwa

A.T.C

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TO BE TRUE COPY

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TO BE TRUE COPY

مذکورہ صفحات دل ایچ او ضلع (4) این ایف ایم کی رپورٹ کے ساتھ

23

صحت سے متعلق
موجودہ رپورٹ کے بارے میں سب سے پہلے طبیعت فریاب کی طرف
سے ڈاکٹر صاحب کے پاس لکھی گئی تھی اور ڈاکٹر صاحب نے معائنہ کے بعد
2020 4 28 کو سٹیڈی رپورٹ کے ذریعہ اس کا نتیجہ لکھا ہے اور اس کے ساتھ
معائنہ کے لیے لکھی گئی ہے

پھر باقی سے پوری درخواست اور اس رپورٹ کے حصول کیا گیا ہے

اس کی طبیعت فریاب کی طرف

الکھتری

ATTESTED
TO BE TRUE COPY

Received in the
application in respect
of Nargis along with
medical report.

2020/04/28

A.T.C

ATTESTED
TO BE TRUE COPY

محمد بن عبد اللہ بن محمد (ابن ابی سلمیٰ) کے نام سے

وفاقی

موجودہ گواہان کی شہادت کے طور پر حضور دروازے پر پہنچا اور علاج کروایا گیا

15/12/2020ء کو 7 مارچ 2021ء تک صحت مند رہا اور گواہان کے

ہتھیار دیئے گئے ہیں اور گواہان کے

آپ کے اہتمام سے فروری 2021ء میں گواہان کے ہتھیار منسوخ کیئے گئے

آپ کی مجلس کواریٹی

~~19/12/2020~~

آپ کی مجلس کواریٹی

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مجلس

11/12/2020

18/3/2020

A.T.C
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FMC
ذریعہ
۵۴۰

92 21224. Contact

۹۲ ۲۱۲۴۰ / ۰۳۳۳ ۹۲۲ ۷۸ ۴۹
DFD

ذاتی سیالگی
مردانہ گزراش ہے میں آجکی سیریا فی سرگرم کنوازی کجا رہا
ابھی تک ڈیوٹی کر رہا ہوں۔ سیریا فی سے سیریا فی
تھی وہ کلا اصرار کیا ہے تاکہ میں علی الاعلان ای راکہ سکوں
آجکی مندر عنقریب اور مندر کی ضرورت اور التماس کرتی ہوں
سیریا فی پر اصرار کیا ہے یہی ای کی وجہ سے مجھے مندر علی الاعلان ہوا ہے

بھی گئے
آجکی عین کنوازی ہوئی

10/3/2020
Applicant. Punit

10/3/2020

الکاضی
ننگس جیو دیو راکہ

ATTESTED
TO BE TRUE

A - آ - C
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TO BE TRUE COPY

MPA

To,

Divisional Forest Officer -I
Forest Planning and Monitoring Circle
Peshawar

Subject: APPLICATION FOR THE RELEASE OF SALARY FROM THE
MONTH OF NOVEMBER 2019 TILL DATE

Respected Sir,

With due respect, it is stated that I am working lady of class iv in forestry planning and monitoring circle, Peshawar. I have forwarded an application Date 10-3-2020 for the release of salary which has been not paid yet since November 2019 till date. It is mentioned here that I am diabetic patient and taking the prescribed medicines and insulin which cost more than 16000/per month I also have to manage the house expenses including utility bills and fruits etc.

It is, therefore, humbly requested to kindly released the salary which had not been paid since the month of November 2019, and proceeding months till date.

Dated: 14/09/2020

Yours Obediently

Margis Bibi
Sanitary Worker

ATTESTED
TO BE TRUE COPY

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35

23

24

Department of Pathology
 CMH Peshawar
 Tel(Mil): 36120, Exch(Mil):36168-71 Ext:207
 Exch(PTCL): (091)9214154, Ext:207
 (091)5277133, Ext:207

Lab ID: 21064315
 Panel: CMH Peshawar
 Ward: Lab OutDoor
 Cell No: 03345094053

Entered By: Muhammad Asif
 Entered At: 23/04/2021
 Print Date: 24/04/2021

Patient: Nargis 93324 (F) (55 Y)

Blood Complete Picture

Blood Counts

TLC	7.8	4.0 - 12.0 X 10 ⁹ /L
RBC	4.48	3.80 - 5.80 X 10 ¹² /L
Haemoglobin	12.5	12.0 - 15.0 g /dL
HCT	37.3	35 to 45 %
MCV	83.3	76.0 - 96.0 fL
MCH	27.9	26.0 - 32.0 pg
MCHC	33.5	30 - 36 g/dL
Platelet Count	186	150 - 400 x10 ⁹ /L

Differential Leucocyte Count

Neutrophils	60	40 - 70 %
Lymphocytes	35	15 - 40 %
Monocytes	03	2 - 10 %
Eosinophils	02	1 - 6 %

Report Authorized By: Dr.Saniya Jalil Registrar Haematology (23/04/21 21:43)

26

36

Department of Pathology
CMH Peshawar

Tel(Mil): 36120, Exch(Mil):36168-71 Ext:20
Exch(PTCL): (091)9214154, Ext:207
(091)5277133, Ext:207

Lab ID: 21064315
Panel: CMH Peshawar

Ward: Lab OutDoor
Cell No: 03345094053

Entered By: Muhammad Asif
Entered At: 23/04/2021
Print Date: 24/04/2021

Patient: Nargis 93324 (F) (55 Y)

Miscellaneous virology

RT-PCR for SARS-CoV-2

Positive *

Opinion There is molecular evidence of SARS-CoV-2 by RT-PCR in the sample provided.

Comment The test has been performed by RNA extraction with Mag Purix viral Nucleic Acid Extraction kit and Amplification by ARGENE RT-PCR detection kit for SARS-CoV 2 using AMPLI Lab Thermal Cycler system.

Report Authorized By: Maj.Naveed Khan:MBBS, FCPS (Histopathology) (23/04/21 22:43)

37

کلیتکل لیبارٹری
پشاور

COOR

nical Laboratory

Amir Building Opp. Khyber Hospital,
University Town, Peshawar.

7-جامرینڈنگ، یونیورسٹی روڈ یونیورسٹی ٹاؤن پشاور

Name:- Nargis
Age :- 2 Years
Specimen:- URINE

Sex :- Female
Ref. By Dr. :- Self
Date :- April 23, 2021

TEST REQ. :- URINE ROUTINE EXAMINATION :-

PHYSICAL EXAMINATION :-

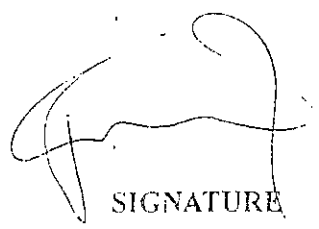
Quantity ----- 20 ml
Color ----- P. Yellow
PH ----- Acidic

CHEMICAL EXAMINATION :-

Albumin ----- +
Sugar ----- ++

MICROSCOPIC EXAMINATION :-

Red Blood Cells ----- 02 - 03 HPF
Pus Cells ----- 08 - 10 HPF
Epith Cells ----- HPF
Granular Cast ----- HPF
Hyaline Cast ----- HPF
Calcium Oxalate ----- HPF


SIGNATURE

NOTE:
(Facility for FDPs, D.dimer, HBAIC, ELISA (HBs, Ag, HCV, PSA) are available

38

~~24~~ ~~105~~

NOOR

Clinical Laboratory

7-Aamir Building Opp. Khyber Hospital,
University Town, Peshawar.

کلینیکل لیبارٹری

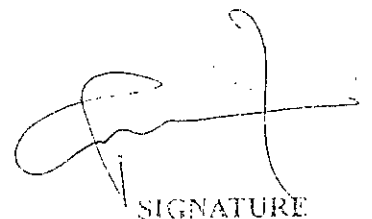
7-عالم بڈنگ، یونیورسٹی روڈ یونیورسٹی ٹاؤن پشاور

Name :- Nargas
Age :- 2 Years
Specimen :- BLOOD

Sex :- Female
Ref. By Dr. :- Self
Date :- April 23, 2021

TEST REQ. :- B.SUGAR // CRP :-

TEST	RESULT	NORMAL REFERENCES
Blood Sugar	279	Random: 80-150 mg/dl
C. Reactive Proteins	68.91	UP TO: 6.0 mg/l

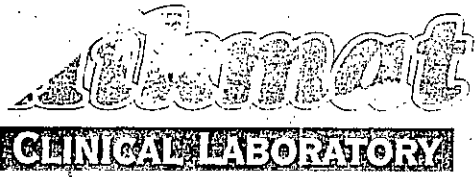

SIGNATURE

NOTE:
(Facility for FDPs, D.dimer, HBA1C, ELISA (HBs.Ag, HCV, PSA) are available)

39

30

101



Consultant
Dr. Haider Ali
MBBS, PMDC, Reg No. 6851-N

Name :- Nargis
Age :- 7 Years
Specimen :- BLOOD

Sex :- Female
Ref. By Dr.
Date :- April 22, 2021

TEST REQ. :- WIDAL// TEST :-

TEST	RESULT
TO	TO : 1/40 AH : 1/20
TH	TH : 1/40 BH : 1/20

M.P.:-

No M.P. Seen IN both Thick & Thin Smear of Blood.

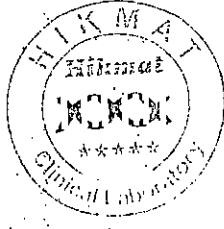
Opp: Doctor Hostel Khyber Teaching Hospital Peshawar. Ph: 091-5850228

40

~~27~~

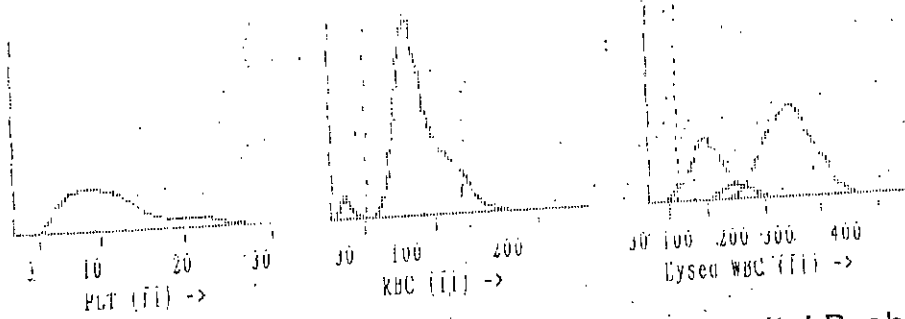
~~28~~

Hikmat
CLINICAL LABORATORY



Consultant
Dr. Haider Ali
MBBS, PMDC, Reg No. 6851-M

ID	NARGIS	SEQ	9025	22/04/2021	21:41:20	01		
1D2								
RBC =	4.53	$10^{12}/l$	PLT =	176	$10^9/l$	WBC =	8.3	$10^9/l$
MCV =	84.9	f1	MPV =	12.4	f1	LYM%	29.4	%
HCT =	38.4	%	KDW% =	13.8	%	GRA%	62.5	%
HGB =	12.9	g/dl				MID%	8.1	%
MCH =	28.6	pg				LYM	2.4	$10^9/l$
MCHC =	33.6	g/dl				GRAN	5.2	$10^9/l$
						MID	0.1	$10^9/l$




Opp: Doctor Hostel Khyber Teaching Hospital Peshawar. Ph: 091-5850228

(41)

~~21~~

~~21~~

<p>GOHAR ALI Divisional Forest Officer-I FP&M Circle Peshawar.</p>		<p>Forestry Planning & Monitoring Circle Palosi Road Aman Abad Peshawar Opposite Pakistan Forest Institute Phone # 091-9221240 Fax # 091-9216637</p>
		<p>No. <u>3237</u>/E Dated: <u>21/04/2021</u></p>

To

Mst. Nargis Masoch, Sweepress,
Forestry Planning & Monitoring Circle,
Peshawar.

Subject: FINAL SHOWCAUSE NOTICE (WILLEFUL ABSENCE FROM OFFICIAL DUTY THEREOF).

Memo: Reference captioned subject.

- > Whereas Mr. Rahatullah Khan, Range Officer, Headquarter FP&M Circle, vide his letter No. - Nil - dated 24-11-2019 has reported that you had absented yourself from official duty w.c.f. 01-11-2019 to 24-11-2019 without describing any cogent reason.
- > Whereas, the undersigned vide this office letter No.2118/E, dated: 25-11-2019 called upon your explanation for the absentee period under question but your reply is still awaited.
- > Whereas, you were reminded vide this office letter No2437/E, dated 23-12-2019 to explain the reasons of your willful absentee but you remained adamant
- > Whereas, you were reminded vide this office letter No2469/E, dated 26-12-2019 to explain the reasons of your willful absentee but you remained adamant.
- > Whereas Mr. Rahatullah Khan, Range Officer, Headquarter FP&M Circle, vide his letter No. - Nil - dated 26-12-2019 once again reported that you had willfully absented yourself from official duty from 11/2019 to date. Neither you have submitted your defense reply nor you made yourself available for the official duty
- > Whereas the Establishment in charge FP&M Circle Peshawar has reported on 26-12-2019 that you are a habitual absentee and have long history of lame excuses for your absence, but have never joined your duty at any time. Your regular absence from Official duty which needs to be taken seriously & demands stern action against you.
- > Whereas the undersigned once again, vide this office letter No.2755/E, dated 09-01-2020 called for your explanation for perpetual absence but to no avail.

-(Continued Page..... 2):-

42

:(Page....2):-

- > Whereas Mr. Rahatullah Khan, Range Officer, Headquarter FP&M Circle, vide his letter No. - Nil - dated 03-02-2020 once again reported that you have not joined your Official duty till date rather you have Sub-letted your job to another person namely Mst: Shahnaz since long.
- > Whereas Mr. Rahatullah Khan, Range Officer, Headquarter FP&M Circle, vide his letter No. - Nil - dated 16-04-2021 once again reported that you have been absented your self since 11/2019 nor joined your Official duty till date.
- > Whereas by reasons of above, you are found guilty of misconduct and inefficiency as conclusively envisages in Rule-3 of the E&D Rules 2011 and thus you have rendered yourself liable for all or any penalties as specified in Rule 4 (b) of the Rules-ibid.
- > Whereas, there are sufficient grounds to dispense with Inquiry and serve show cause notice directly.
- > And whereas the undersigned as competent authority and powers conferred on him vide Rule-7 with Rule-4 of the E&D Rules-2011 hereby serve show cause notice upon you and you are directed to showing cause as to why you should not be dismissed from service.
- > Your reply to the show cause must reach within seven (15) days after the receipt of this letter without fail, failing which ex-parte action shall follow against you under the rules.
- > Stat weather you want to be heard in person accordingly.

Divisional Forest Officer-I
FP&M Circle
Peshawar

No. _____

Copy forwarded for information and necessary action to the:

1. Conservator of Forests, Forestry Planning & Monitoring Circle, Peshawar for favour of information please.
2. Establishment Clerk, Forestry Planning & Monitoring Circle, Peshawar for information & necessary action.
3. RO Headquarter, Forestry Planning & Monitoring Circle, Peshawar for information & necessary action.

Divisional Forest Officer-I
FP&M Circle
Peshawar

(Gohar Ali) Divisional Forest Officer- I FP& M Circle Peshawar	Forestry Planning & Monitoring Circle Palosi Road, Aman Road Peshawar Opposite Pakistan Forest Institute Phone # 091-9221240-41 Fax # 091-9216637
No. 3237 /E: Dated: 21/04/2021	

To
Mst. Nargis Maseeh (Sweeperess)
Forestry Planning & Monitoring Circle ,
Peshawar

Subject: **FINAL SHOW CAUSE NOTICE (WILLFUL ABSENCE FROM OFFICIAL DUTY THEREFO**

Memo:- Reference captioned subject.

- Whereas Mr. Rahatullah Khan, Range Officer, Headquarter FP&M Circle, vide his letter No.- -dated 24/11/2019 ahs reported that you had absented yourself (from official duty w.e.f 01.11.2019 to 24.11.2019 without describing any cogent reason.
- Whereas, the undersigned vide this office letter No.2118/E, dated 25.11.2019 called upon explanation for the absentee period under question but your reply is till awaited.
- Whereas, you are reminded vide this office letter No.2437/E, dated 23.12.2019 to explain the reasons of your willful absentee but you remained adamant.
- Whereas, you were reminded vide this office letter No.2469/E, dated 26.12.2019 to explain the reason of your willful absentee but you remained adamant.
- Whereas Mr. Rahatullah Khan Rage Officer, Headquarter FP&M Circle, vide his letter No. – Nil – dated 26.12.2019 once again reported that you had will fully absented yourself from official duty from 11/2019 to date. Neither you have submitted your defense reply nor you made yourself available for the official duty.
- Whereas the Establishment in charge FP&M circle Peshawar has reported on 26.12.2019 that you are a habitual absente and have long history of lame excuse for your absence, but have never joined your duty at any time. Your regular absence from official duty which needs to be taken seriously & demands stern action against you.
- Whereas the undersigned once again vide this office letter No.2755/E, dated 03.01.2020 called for your explanation for perpetual absence but to no avail.

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(Continued Page.....2.....)

- Whereas Mr. Rahat Ullah Khan, Range Officer, Headquarter FP&M Circle, vide his letter No. – NIL – dated 03.02.2020 once again reported that you have not joined your Official duty till date rather you have sub letted your job to another person namely Mst. Shahnaz since long.
- Where Mr. Rahatullah Khan, Range Officer, Headquarter FP&M Circle vide his letter No. NIL dated 16.06.2021 once again reported that you have been absented yourself since 11/2019 nor joined your official duty till date.
- Whereas by reasons of above, you are found guilty of misconduct and inefficiency as conclusively envisages in Rule-3 of the E&D Rules 2011 and thus you have rendered yourself liable for all or any penalties as specified in Rule-4 (b) of the Rules ibid.
- Whereas, there are sufficient grounds to dispense with Inquiry and serve show cause notice directly.
- And whereas the undersigned as competent authority and powers conferred on his vide Rule-7 read with Rule-4 of the E&D Rules-2011 whereby serve show cause notice upon you and you are directed to showing cause as to why you should not be dismissed from service.
- Your reply to the Show Cause must reach within seven (15) days after the receipt of this letter without fail, failing which ex-parte action shall follow against you under the rules.
- Stat weather you want ot be heard in person accordingly.

Sd/-
Divisional Forest Officer-I
FP&M Circle
Peshawar

No. _____/E/

Copy of forwarded for information and necessary action to the

1. Conservator of Forests/ Forestry Planning & Monitoring Circle, Peshawar for favour of information please.
2. Establishment Clerk, Forestry Planning & Monitoring Circle, Peshawar for information & necessary action.
3. RO Headquarter, Forestry planning & Monitoring Circle, Peshawar for information & necessary action.

Sd/-
Divisional Forest Officer-I
FP&M Circle
Peshawar

(45)

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800

~~800~~

بخدمت جناب ڈی ایف او (ون)

جناب عالی!

عنوان: جواب نامہ برائے شوکاژ نوٹس

التماس ہے کہ سائلہ بی بی جو کے پشاور یونیورسٹی کیسپس کی رہائشی ہے اور محکمہ جنگلات (FP & M Circle) میں پچھلے 26 سال سے کلاس فور میں اپنی ڈیوٹی سرانجام دے رہی ہے سائلہ نے اپنی ڈیوٹی ایمانداری سے نبھانے میں کبھی کمی نہیں آنے دی۔ سائلہ نرس بی بی کافی عرصہ سے شوگر کے مرض میں بھی مبتلا ہے جو کہ عرصہ دراز سے ایکسولین انجکشن اور لینٹس انجکشن روزانہ کے حساب سے لگاتی ہے۔ جس کے لیے مختلف ہسپتالوں اور پرائیویٹ ڈاکٹرز سے ابھی تک علاج جاری و ساری ہے اور شوگر کی وجہ سے مختلف امراض کا بھی شکار ہو چکی ہے جس میں آنکھوں کا علاج بھی کروایا جا چکا ہے اور آنکھوں کی بینائی کے علاج کروانے کے باوجود بھی نظر بہت کمزور ہے حال ہی میں پوری دنیا کرنا جیسے دبائی مرض میں مبتلا ہے جس کا شکار ہر دوسرا شخص بنا ہوا ہے۔ اور سائلہ نے خود بھی اپنا کروانہ ٹیسٹ کروا چکی ہے۔ جس کے رزلٹ مثبت آئیں ہے اور سائلہ نے خود کو گھر میں بھی Isolate کیا ہوا ہے۔

محترم جناب صاحبان سائلہ نے اپنی بیماری کا مقابلہ اور علاج سال 2017-2018 میں خوب کروایا اور مختلف ہسپتالوں اور پرائیویٹ ڈاکٹرز سے علاج معالجہ کروایا لیکن سائلہ اپنی شوگر اور ہڈیوں میں دردوں کی وجہ سے مزید ڈیوٹی کرنے سے قاصر تھی۔ سائلہ نرس بی بی نے اپنے افسران کو اپنی بیماری کے متعلق بارہا آگاہ کر چکی ہے اور میڈیکل بھی مہیا کیے ہوئے ہیں۔ جو کہ درخواست کے ساتھ لف ہے۔ اور میڈیکل بورڈ کے لیے بھی کئی دفعہ درخواست دی چکی ہے لیکن آپ افسران کی جناب سے کوئی بھی سنوائی نہ ہوئی۔ جو کہ زیادتی کا ایک مٹہ بولتا ثبوت ہے۔ سائلہ نرس بی بی اپنی ڈیوٹی کے دوران اپنے ساتھ ایک ہیلپر شہناز بی بی کو بھی ساتھ لے جایا کرتی تھی جو کہ افسران بالا کے نوٹس میں بھی ہے اور سائلہ نے اپنی ڈیوٹی مارچ 2020 تک جاوی رکھی اور اس کے بعد آپ افسران کو متعلقہ بار اپنے میڈیکل سرٹیفکیٹ اور میڈیکل بورڈ کی درخواست جمع کروا چکی ہے۔ لیکن آپ صاحبان نے نرم مزاجی اختیار کرنے کی بجائے سخت رویہ اختیار کیا اور بار بار سادہ رٹائرمنٹ کا بولتے رہے جو کہ آپ افسران کی سخت دلی کو ظاہر

A. T. C.

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کرتا ہے سائل آپ افسران کو اپنی تنخواہ کے لیے بھی درخواست دے چکی ہے لیکن اس پر بھی کوئی سنوائی نہیں ہوئی آپ صاحبان کے ایسے سخت رویے کی وجہ سے سائل ڈپریشن کا شکار ہو چکی ہے۔

سائل نے اپنی میڈیکل بورڈ اور میڈیکل بیڈریسٹ کی درخواست مختلف تاریخ پر آپ افسران کو جمع کروا چکی ہے۔ جو کہ درج ذیل ہے اور آپ افسران کے آفس ریکارڈ کا حلقہ بھی ہے۔

1- درخواست برائے ڈی ایف او (ون) 10-03-2020

2- درخواست برائے ڈی ایف او (ون) 19-03-2020

3- درخواست برائے ڈی ایف او (ون) 22-06-2020

4- درخواست برائے سیکرٹری اور انفرامینٹ فارسٹ / ڈی ایف او (ون) 22-07-2020

5- درخواست برائے ڈی ایف او (ون) 14-09-2020

6- درخواست برائے سیکرٹری انوائزمنٹ فارسٹ 02-10-2020

سائل افسران بالا سے اب بھی درخواست کرتی ہے کہ اسے میڈیکل بورڈ پر ریٹائرڈ کیا جائے اور سائل کی 26 سالہ خدمت کو یاد رکھا جائے۔ آپ افسران کے لیے دل سے دُعا گور ہوگی۔

العارض

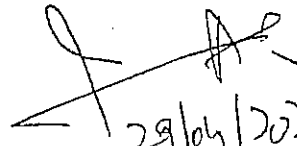
زرگس بی بی

شناختی کارڈ نمبر: 7-4149224-17301

فون نمبر: 03339444692

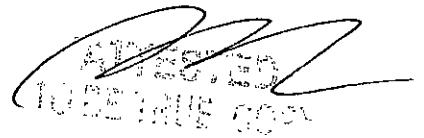
تاریخ: 29-04-2021

Received Reply today
on 29/04/2021.


29/04/2021.

Received By: _____

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TO BE TRUE COPY

سوال: آپ پورے سال سے ڈیوٹی کر رہی ہیں یا ٹرگس

جواب: ...

سوال: کیا آپ کو اپنی ڈیوٹی سرانجام دینے میں سرکاری رعیتیں مہیاں آتے ہیں۔

جواب: جی ہاں۔ ٹرگس ...

سوال: کیا مالونی کے فرائض آپ سے ملتے ہیں کہ آپ سرکاری ڈیوٹی کر رہی ہیں۔

جواب: اس کے بارے میں مالونی کے لوگوں سے پوچھیں، میں اس بارے میں کیا کہہ سکتی ہوں۔ ٹرگس

سوال: کیا آپ نے اس بارے میں کوئی بھی چیز دیکھی ہے جو اس بارے میں لکھی ہوئی ہے۔

جواب: نہیں میں نے اس بارے میں کیا ہے۔ ٹرگس

سوال: کیا آپ کی فوٹو پر سٹیٹ بورڈ کے لیے بھیجا گیا تھا۔

جواب: ...

سوال: کیا آپ کے بارے میں سٹیٹ بورڈ نے کیا (Recommendation) دی تھی۔

جواب: سٹیٹ بورڈ نے مجھے ڈیوٹی کرنے کے لیے راز دیا تھا۔ ٹرگس

سوال: ریکارڈ کے مطابق 2002ء میں سٹیٹ بورڈ نے آپ کو ڈیوٹی کرنے کے لیے راز دیا تھا مگر اس کے بعد بھی آپ ڈیوٹی پر حاضر نہ ہوئیں۔

سوال نمبر 9: آپ کے تحریر جواب میں اپنے اقرار کیا ہے کہ آپ

اپنی ڈیولٹ کو سہی اور قانون کے زریعے سرانجام دینی رہی ہیں۔

اس سلسلہ میں قانونی کے عین بھی دو دو قوانین کا ذکر

کرتے ہیں۔ لہذا لہذا کرتے ہیں۔ اسے بار بار میں آپ کیا کرتے ہیں۔

تقریباً آپ ان قوانین کو کاربندی رقم ادا کرتی رہی ہیں۔

جواب: گوکہ صورت سببوں اور بعد میں شہنار نامی حالات

کو اپنی مدد کے ساتھ رخصت بھی - ترکیبی

جہاں تک رقم کی ادائیگی کی بات ہے یہ عمل دائمی معاملہ ہے۔

ہزار خود کیا کہ ساری قانون والوں کی خبر سے ساتھ ساتھ ہزار

پہلے میں تو کئی سے ساتھ ساتھ نہیں کیا۔

سوال نمبر 10: کیا آپ کے خلاف اس سلسلہ میں چھاپا نہ آنی چکی ہوئی تھی۔

جواب: ~~جواب میں اس کا کچھ نہیں بولا~~ - ترکیبی

سوال نمبر 11: دینیخ آفیسر رپورٹ کے مطابق آپ نومبر 2018 سے تاحال غیر حاضر ہو

چکے بار بار میں آپ سے بار بار وضاحت طلب کی گئی۔ کیا

جواب دینا آپ نے مناسب نہ سمجھا دیتے بار بار میں کیا گیا ہے۔

جواب: ان ڈیولٹ میں تنخواہ بند کر دی نومبر 2018 سے چھ ماہ میں

ڈیولٹ غیر حاضر تھی، یہ وضاحت اس کے جو کہ قانونی اجازت ہے

کہا کہ ~~ڈیولٹ~~ (دو تین مرتبہ) جب سے نہ ہو سکی۔ سارا تو

کرونا کی وجہ سے آئی۔ کرونا وجہ سے لوگوں کے مدد کے سلسلے

مندی تنخواہ بند ہے اور میں ڈیولٹ بھی ارفاد ہوں۔

سوال نمبر 12: آپ ذہنی طور پر کہا جاتا ہے کہ ہائیڈرو پمپ میں کوئی

خرابی نہیں پیش کرنا چاہیے۔

جواب: بلکہ پمپ میں خرابی سے ڈرے دے دیا جسے ذہنی طور پر کہا گیا ہے۔

میں اس بات کی تصدیق کرتی ہوں کہ سوالات اور جوابات کا سلسلہ
(Personal Hearing) میرا بیٹے مسی جواد ذک علیہ السلام
قومی شناختی کارڈ نمبر 17301-81348531 کی موجودگی میں ہوئی
جس میں اس نے میری مدد لے رہی ہے۔

نزدک

۱- نذر گیس مسیح سوپر مارکیٹ (Feroz) بالوئی
روزہ دار۔

المقوم 02-06-2021

۲- جواد ذک علیہ السلام . المقوم
02.06-2021

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OFFICE ORDER NO 59 DATED PESHAWAR THE 16 /06/2021 ISSUED BY GOHAR ALI DIVISIONAL FOREST OFFICER-I, FORESTRY PLANNING & MONITORING CIRCLE, PESHAWAR.

Whereas Mst. Nargis Maseeh, Sweepress, was served with final Show Cause Notice vide this office letter No. 3237/E Dated 21-04-2021, under Rule-7(a) of Government of Khyber Pakhtunkhwa (Efficiency & Disciplinary Rules, 2011.

Whereas the reply of first show-cause submitted by her on 29-04-2021 was found unsatisfactory after subsequent analysis. Therefore, she was given chance of personal hearing on 25-05-2021 but she did not attend this office and submitted a reply that due to COVID-19, she cannot attend the office. She was given another chance of personal hearing on 02-06-2021 which was conducted on the same date.

Whereas, her replies during the personal hearing were found unsatisfactory, thus the charges "Misconduct" and "Inefficiency stand proved.

Hence, the undersigned in the capacity of competent authority and power conferred on him vide Rule-4 (b) (ii) of E&D rules 2011; taking a lenient view hereby compulsory retires Mst. Nargis Maseeh. The period of her absence from official duty with effect from 24-11-2019 to 02-06-2021 is hereby treated as leave without pay in the best interest of Public Service.

Sd/-

(Gohar Ali)

Divisional Forest Officer-I,
Forestry Planning and Monitoring Circle,
Peshawar.

No 3701-05 ✓/E,

Copy Forwarded to.

1. The Conservator of Forests, Forestry Planning and Monitoring Circle Peshawar for favour of information and further necessary action.
2. The Range Office Head Quarter, Forestry Planning and Monitoring Circle Peshawar for information and necessary action.
- ✓ 3. Mst. Nargis Maseeh, Forest inventory Colony for information.
4. Circle Accountant Forestry Planning & Monitoring Circle Peshawar for information & necessary action.
5. Incharge Estt (Section) Forestry Planning & Monitoring Circle Peshawar for information and necessary action.
6. Personal file



Divisional Forest Officer-I
Forestry Planning and Monitoring Circle,
Peshawar.

2

(51)

To

The Secretary Forest
Environmental Wild Life
Department Khyber Pakhtunkhwa, Peshawar

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER NO.59
DATED 16.06.2021 OF COMPULSORY RETIREMENT OF THE
APPELLANT ISSUED BY THE GOHAR ALI DIVISIONAL FOREST
OFFICER-I, FORESTRY PLANNY AND MONITORY CIRCLE
PESHAWAR.

Prayer-In-Appeal:-

On acceptance of this appeal the order dated 16.06.2021 may please be set aside and the appellant may kindly be referred to the Medical Board and given retirement on Medical ground with all back benefit and release of salaries stop by the Department in the year 2019 and also cancel or set aside notice issued for vacation of quarter.

Respectfully Submitted:-

I very humbly submit the following few lines for your kind and sympathetic consideration.


1. That the appellant was initially appointed as Sweeper on 29.06.1994 in your Department and later on was joined her duty on 01.07.1997. (Copies of the employees profile, pay bill and service certificate are attached).
2. That since my appointments I have performed by duties as assigned with zeal and devotion and there was no compliant whatsoever regarding my performance was always appreciated by my superiors.

3. That being regular employee the appellant was performing her duty on her respective post with good results and was giving outstanding performance since last 26 years, meanwhile in the year 2002 appellant was become ill and suffering from several diseases i.e diabaties, blood pressure etc, she has informed her high ups regarding her illness and she was performing her duty with full devotion.
4. That as the appellant is being honest and is regularly performing her duties with ill heath, furthermore in the year 2019 the department had stopped the salary of the appellant in this respect the appellant also moved application for release of her salaries, moreover the appellant in the year 2020 applied for her medical board as she was not feeling well and was not in position to further performed her duties, the Doctors has advised the appellant that " keeping in view complication refer to Medical board for retirement and keeping in view the prospect of recovery she is referred to be boarded out on medical grounds thereafter the appellant submitted many applications to her high ups for her medical board and medical bedrest but with fruitful result. (Copies of the Medical Report, Applications for Medical Board and application for releasing of salaries are attached).
5. That the appellant had performed her duties with a critical situation and recently the appellant suffering from Covid-19 due to which she approached for Medical and all tests were positive and doctors concerned was advised for complete bed rest and also advised her medical board to be boarded out on Medical Ground thereafter the appellant filed several applications along with her medical record but the respondents are turned deaf ear.

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<p>Khurshid Ali Khan Conservator of Forests</p>		<p>Forestry Planning & Monitoring Circle Palosi Road Aman Abad Peshawar Opposite Pakistan Forest Institute Phone # 091-9221240-41 Fax # 091-9216637</p> <p>No. <u>855</u> /E Dated <u>15/9/2021</u>.</p>
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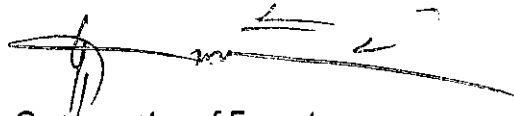
To
Mst: Nargis Maseh (Ex-Sweepress),
Forestry, Planning & Monitoring Circle,
Peshawar.

Subject: APPEAL AGAINST OFFICE ORDER NO. 59 DATED 16-06-2021
ISSUED BY DIVISIONAL FOREST OFFICER-I FORESTRY
PLANNING AND MONITORING CIRCLE, PESHAWAR.

Memo:- Reference your appeal dated 07/07/2021


From the perusal of your service record and service documents, it is evident that you had always remained a habitual absentee having no interest in performance of your official duties on regular and punctual basis. As clearly spelt out in the final show cause notice issued to you vide this office letter No.3237/E dated 21/04/2021, you have categorically failed to present satisfactory replies during your personal hearing held on 02/06/2021. The competent authority therefore, does not agree with the contents of your appeal at this stage as per the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011.

Keeping in view the above exposition, your appeal against the Office Order No.59 dated 16/06/2021 issued by the Divisional Forest Officer-I Forestry Planning and Monitoring Circle, Peshawar is hereby rejected accordingly.


Conservator of Forests
Forestry Planning & Monitoring Circle
Peshawar 2

No. _____/E
Copy forwarded to the

1. Divisional Forest Officer-I Forestry Planning and Monitoring Circle, Peshawar for favour of information, please.
2. Mr. Rahatullah Khan (Incharge Head Quarter) Forestry Planning & Monitoring Circle Peshawar for information.


Conservator of Forests
Forestry Planning & Monitoring Circle
Peshawar

(55)

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(677)

The Secretary Forestry
Khyber Pakhtoon khwa
Peshawar Cantt.

Subject: Mercy Appeal against order No. 855 dated 15/09/2021 regarding my Medical Board.

Respected Sir,

Humble request I have the honor to state that despite ~~and~~ and reply to the divisional forest officer I forestry planning and monitoring circle Peshawar and conservator forestry planning and monitoring circle Peshawar.

Sir I am working as a sweeper in the office of forest ~~and~~ monitoring circle Peshawar.

I have my children studying in various school and college ~~and~~ use of my own and have no other source of income. Though I was on ~~and~~ have paid lead my subsistence on my own pocket because my office ~~and~~ difficulties with my problem in my absences.

Recently I have received a letter bearing No. 855 E dated ~~and~~ conservator Forestry and planning and monitoring ~~and~~ appeal was rejected.

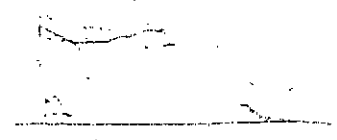
So I beg to approach to your good self and consider ~~and~~ served said department about more than 25 years ~~and~~ credit. More over all my appeal pertaining to this case ~~and~~

I shall be very thankful for this act of kindness.

Dated 17.09.2021

Chief Conservator forestry planning and monitoring circle Peshawar
Divisional forestry officer I forestry planning and monitoring circle Peshawar

Secretary Forestry
D No, 6771
dated 17/9/21.



(56)

(57)

64A

To
The Secretary Forestry
Khyber Pakhtoon khwa
Peshawar Cantt.

Subject: Mercy Appeal against order No. 855/E dated 15/09/2021 regarding my Medical Board.

Respected Sir,

Humble request I have the honor to state that despite of my serval appeal and reply to the divisional forest officer 1 forestry planning and monitoring circle Peshawar and conservator forestry planning and monitoring circle Peshawar.


Sir I am working as a sweepers in the office of forestry planning and monitoring circle Peshawar.

I have my children studding in various school and colleges I have no house of my own, and have no other source of income. Though I was on medical leave yet, I have provided my substituted on my own pocket because my office did not suffer any difficulties with any problem in my absences.

Recently I have received a letter bearing No. 855/E dated 15/09/2021 from Mr. Khurshid Ali Khan conservator Forestry and planning and monitoring circle Peshawar where in my appeal was rejected.

So I bag to Approach to your good self and consider my mercy appeal sympathacally. As I served said department about more than 25 years. Honestly and punchually service at my credit. More over all my appeal pertaining to this case are attached for ready reference.


I shall be very thankfully for this act of kindness.


Your's sincerely
Sanatory Worker
Nargis Bibi

Dated : 17.09.2021

C.C :

1. Chief Conservator forestry planning and monitoring circle Peshawar
2. Divisional forestry officer 1 forestry planning and monitoring circle Peshawar

<p>Amin Ul Islam Divisional Forest Officer-I</p>		<p>Forestry Planning & Monitoring Circle Palosi Road Aman Abad Peshawar Opposite Pakistan Forest Institute Phone # 091-9221140 Fax # 091-9216637</p>
		<p>No. <u>2169</u> /E Dated <u>06/01/2022</u>.</p>

To

Mst. Nargas Maseeh (Sweepress)
FP&M Circle Peshawar.

Subject: VACATION OF RESIDENTIAL GOVERNMENT QUARTER

Memo: Reference RO Head Quarter FP&M Circle Peshawar report dated 27/12/2021

As per report of Range Officer Head Quarter Forestry Planning and Monitoring Circle, Peshawar dated 27/12/2021 you have already compulsory retired from Government service on 16-06-2021 and as per rule you have authorize to stay in government residence for six months after retirement.

After retirement you have filed an appeal to Conservator of Forest Forestry Planning and Monitoring Circle, Peshawar which was also rejected. Hence, your stay in the Government residence is illegal.

Therefore, you are directed to immediately vacate the government residence No. G-IV in Forestry Planning & Monitoring Circle Peshawar colony within seven days from receipt of this notice, accordingly otherwise stream legal action will be initiated against you, beside recharge of commercial rent accordingly.

Acknowledge receipt.

Divisional Forest Officer-I
Forestry Planning & Monitoring Circle
Peshawar

No. _____ /E:



Copy forwarded to:-

1. Conservator of Forests, Forestry Planning & Monitoring Circle, Peshawar for information.
2. Range Officer (HQ) Forestry Planning and Monitoring Circle, Peshawar for information and necessary action. He is directed to pursue the case till its logical end with reference to his report Dated 27-12-2021.
3. Circle Accountant Forestry Planning & Monitoring Circle Peshawar for information & necessary action.


Divisional Forest Officer-I
Forestry Planning & Monitoring Circle
Peshawar

Received 07.1.2022

Amur
Kullah

تیت 50 روپے	111525			
ایڈوکیٹ: <u>عمران خان</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <u>15-5847</u>				
رابطہ نمبر: <u>0313-9646150</u>				

بعدالت جناب: CHAIR MAN SERICE Tribunal KPK

مخائب:	دعویٰ: <u>اپیل</u>
APPELLANT	علت نمبر: _____
	مورخہ: _____
NARCIS MASEEF	جرم: _____
بنام	تھانہ: _____
COMRAH AND OTHERS	

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی کاروائی متعلقہ
آن مقام سے ایڈوکیٹ عمران خان کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا اتمام اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف 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 کی طرف سے یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لے جانے کے لئے اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور ان کا ساختہ پر داختم منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانباً اتوائے 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 سند رہے
المرقوم نے 2022-18-17
PUNJAB BAR ASSOCIATION
پشاور

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

BEFORE THE LEARNED KHYBER PAKTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Nargis Maseeh

VERSUS

Divisional forest officer no.1 and others

APPLICATION FOR EARLY HEARING IN THE ABOVE

TITLED CASE FOR ISSUING INTERIM INJUNCTION

NFA
26/11/2022

RESPECTFULLY SHEWETH,

1. That the above noted case is pending before this Honorable tribunal in which the date of hearing has not been fixed.
2. That the respondents have issued a notice for vacation of residential government servant quarter where the appellant is residing and the respondents are going to deprive the appellant from the servant quarter
3. That there is absolutely no legal bar in allowing the instant application rather the same would be in the larger interest of justice.
4. That the appellant has a prima facie case in her favor and in case the interim relief is not granted the suit of the appellant would be infructuous and the appellant would suffer extreme irreparable loss.

It is, therefore, prayed that on acceptance of instant application, the appeal of the appellant may kindly be fixed early.

APPELLANT

THROUGH


IMRAN KHAN

Advocate, High Court Peshawar