Form- A

FORM OF ORDER SHEET

	Case No	1101/2022	
10.	Date of order proceedings	Order or other proceedings with signature of jud	
1	2	3	
1-	06/07/2022	The appeal of Mr. Naqeebullah resubmit Zahid Advocate may be entered in the Institution Worthy Chairman for proper order please.	
	14-7-22	This case is entrusted to Single Bench	REGISTRAR at Peshawar for prelim
	14-1-2	hearing to be put there on 27-7-22.No	
		and his counsel for the date fixed.	
			CHAIRMAN
-			;
			. «.
		·	

The appeal of Mr. Naqeebullah son of Ghulam Daraz Ex-Constable belt no. 5846 FRP Bannu received today i.e. on 05.07.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of departmental appeal is not attached with the appeal which may be placed on it.

No. 2162 /S.T.
Dt. 05/7 /2022

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Zahidullah Zahid Adv.
High Court Pesh.

Respected Sir.

Since the doportment prespondents
have refused to provide copy of the
Second vide applications dated 7-6-22 ats
page 61, hence a cm has already been
appended at page 10 of the appeal for
Semming, calling of a Second of the case)
appellants, if otherwise may be fixed
before the bonch. Therefore Se-Subomitteel Please.

A .

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Case Title: Nagceb Wlah vs SP, PRP; others.

Cas	e Title: /Vazees waar vs of, riv)		
S#	CONTENTS	YES	NO
1	This Appeal has been presented by 2011 ULAH 2011	ALL	<u>':</u>
2	Whether counsel / appellant/ respondent/ deponent have		
	signed the requisite document?		
3	Whether appeal is within time?	1	
4	Whether the enactment under which the appeal is filed mentioned?	-	-
5	Whether the enactment under which the appeal is filed is correct?	-	
6	Whether affidavit is appended?	1	•
7	Whether affidavit is duly attested by competent oath	1_	_
'	commissioner?		
8	Whether Appeal / Annexures are properly paged?	سسا	-
9	Whether Certificate regarding filing any earlier appeal on the subject, furnished?	<u></u>	
10	Whether annexures are legible?	1	<i>-</i>
11	Whether annexures are attested?	~	7
12	Whether copies of annexures are readable/ clear?	1_	4
13	Whether copy of appeal is delivered to AG/ DAG?	v	7
14	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/ Appellant / Respondents?	1	
15	Whether number of referred cases given are correct?	1	
16	Whether appeal contains cutting / overwriting?		-
17	Whether list of books has been provided at the end of the appeal?	N	1
18	Whether case relate to this Court?	L	
19	Whether requisite number of spare copies are attached?	-	-
20	Whether complete spare copy is filed in separate file cover?	v	_
21	Whether addresses of parties given are complete?	V	•
22	Whether index filed?	レ	
23	Whether index is correct?	1	_
24	Whether security and process fee deposited? On		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal		
	Rules 1974 Rule 11, Notice along with copy of Appeal and annexures has been sent to Respondents? On $4 - 7 - 2022$		^
26	Whether copies of comments / reply / rejoinder submitted?		
20	On		
27	Whether copies of comments/ reply/ rejoinder provided to opposite party? On		<u> </u>
L	opposite party: Oil		

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

Name: JAHID ULLAH ZOLLID AHE

Signature: -

Dated: - 5-7- 2022.

In Ref. Service Appeal No. 101 /2022

Nageeb Ullah

VERSUS

Superintendent of Frontier Reserve Police (SP- FRP) & Others

I N D E X

s.NO	NAME AND DESCRIPTION OF DOCUMENTS	WWWEXPLES	PAGE
1	GROUNDS OF APPEAL WITH AFFIDAVIT		1-7
2	APPLICATION FOR CONDONATION OF DELAY		8.9
1 3	APPLICATION FOR SUMMONING RECORD		10-11
4	COPIES OF MEDICAL REPORTS	A	12-54
5	COPY OF ORDER DATED 11/07/2016	₩.	55-56-A
6	COPY OF REVISION PETITION	(b)	57-60
7	COPY OF APPLICATION TO GET COPIES OF PROCEEDINGS	8	61.
8	COPY OF NOTICE WITH RECEIPTS		62-64
9	WAKALATNAMA		

Through

APPELLANT

ZAHIDULLAH ZAHID

IFTIKHAR HUSSAIN SAMANDAR

Advocates, High Court.

Deans Trade Center Peshawar

Cantt. 03229113699

In Ref. Service Appeal No. 15 / 2022

Naqeeb Ullah S/O Ghulam Daraz, Ex-constable belt No. 5846 Frontier Reserve Police (FRP) Bannu, R/O Kotla Arsala Khan Ghoraiwala District Bannu. **VERSUS** Superintendent of Frontier Reserve Police (SP- FRP) Bannu Region Bannu. Commandant Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar. Police, Khyber Frontier Reserve Deputy Commandant Pakhtunkhwa, Peshawar. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar. Respondents SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1973

Respectfully Sheweth:

1.

3.

4.

It is submitted very humbly as under:

- That the appellant belong to a respectable and law abiding, civilized and peaceful family of Bannu.
- 2. That being the only son of his parents, appellant is the only

- 3. That the appellant joined FRP (Frontier Reserve Police) Bannu Range as Constable in 2012.
- 4. That after joining the force the appellant due to his personal zeal, enthusiasm, hard work, sincerity, honesty and commitment went through and completed all his training successfully.
- 5. That the appellant had been doing his duty with all professional devotion, hence earned the entire satisfaction of his High Ups and the Superiors however at the end of year 2015 fell seriously ill and laid on the bed that's why couldn't continue his duty.

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(Copies of Medical Reports attached)

6. That the appellant was discharge from service vide order dated 11/07/2016 due to absence from duty by Respondent No.1.

(Copy attached)

- 7. That since the order of discharging from service hereinafter referred as the impugned order has never been communicated to the appellant, hence after getting knowledge thereof a departmental appeal was preferred in November 2020 which was dismissed on 01/12/2020 by Respondent No.3.
- **8.** That a revision petition was preferred to Respondent No.4 on 20/01/2021 but no response could be seen on it as yet.

(Copy attached)

9. That in order to get copies of inquiry proceedings, impugned orders and departmental appeals an application was made to respondent No.1 to 3, but they refused to hand over any copy thereof.

(Copy of application attached)

10. That now the appellant being deeply aggrieved of and having no other remedy prefers this service appeal inter alia on the following grounds amongst others.

GROUNDS:

- A. That the order impugned herein is illegal, unlawful, arbitrary, onesided and against the relevant law, rules and regulations, hence not sustainable.
- B. That the impugned order is based on misuse of power and authority and against the universal principle of natural justice.
- C. That the order impugned herein lacks the qualification to be speaking order as no plausible explanation and reason is mentioned therein for imposing major penalty against minor nature of misconduct.
- D. That neither charge sheet nor any show cause notice has ever been served on the appellant even the inquiry officer has never bothered to visit or meet the appellant rather to hold inquiry by probing in to the matter.
- E. That no opportunity of personal hearing has been given or granted to the appellant while imposing such a harsh punishment of major penalty against a minor nature of misconduct, i.e. absence from duty.
- F. That the order impugned herein is void-ab-initio in nature as the phenomena of discharging from duty is alien to the police rules of 1975, while for contractual employees the same can only be done under the contract but not under the mentioned rules.
- That keeping in view the dicta of the superior courts on the principle of natural justice, "that times does not run against an illegal order", hence the order impugned herein being void-abinitio in nature the appeal in hand is right in time.
- H. That ailment and having being on bed is a strong reason for absence from duty duly supported by medical documents but none of these has been mentioned or even discussed by Respondent No.1 to 3 in their impugned orders.

- I. That the medical ground has been categorically taken in the departmental appeal but not even discussed therein, rather to mention any reason for its disbelieving.
- J. That under the law long absence from duty is not gross misconduct, hence major penalty cannot be imposed, reliance is made on 2008 SCMR 214.
- K. That since the appellant has not been served with any charge sheet, show cause notice, or has given any opportunity of personal hearing, hence the impugned order being voilative of the principle of natural justice is arbitrary, whimsical and without lawful authority. (2015 PLC(CS) 537 Islamabad)
- L. That the impugned order is in violation of Article 3,4,10(A) and 25 of the constitution of Islamic Republic of Pakistan and Section 24(A) of General Clauses Act.

(2022 YLR 644, 2016 SCMR 943, 2022 PTD 484)

M. That while deciding the departmental appeal the appellate authority has not applied its independent judicial mind, hence impugned orders is not maintainable.

(2016 SLJ (FST) 1172-A)

N. That since the impugned order is illegal and viod in nature therefore keeping in view the judgments of superior courts the major penalty can be converted into minor penalty by considering the period of absence from duty as leave with due kind.

(2016 SLJ (FST-Kar) 1079)

O. That other point will be raised at the bar at the time of hearing of the case.

It is therefore most graciously prayed that while allowing the instant **APPEAL** by declaring the impugned orders illegal, null, and void being void-ab-initio the appellant may kindly be reinstated in service with all

back benefits ancillary and incidental to the service of the appellant.

Any other remedy which is appropriate in circumstances of the case may also be granted.

Nagleeb. uld/APPELLANT

Through -

ZAHIDULLAH ZAHID

TIKHAR HUSSAIN SAMANDAR

High Court.

Books for reference:

- Khyber Pakhtunkhwa Service Tribunal Act 1973 along with Rules & regulations thereunder.
- CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 AS AMENDED UP-2. TO-DATE
- 3. General Clauses Act.
- 2008 SCMR 214, 2015 PLC(CS) 537 Islamabad, 2022 YLR 644, 4. 2016 SCMR 943, 2022 PTD 484, 2016 (FST) 1172-A, 2016 SLJ (FST-Kar) 1079
- .. 5. FURTHER CASE LAWS ACCORDING TO NEED

ADVOCATE

Kertificate

It is here by costified that no

Such tile appeal how earlier been filed by or on schalf of the appellant Advo

In	Ref.	Service App	peal No.	/202
In	Ker.	Service App	peal No	/202

Naqeeb Ullah

VERSUS

Superintendent of Frontier Reserve Police (SP- FRP) & Others

AFFIDAVIT

I, ZAHID ULLAH ZAHID ADVOCATE HIGH COURT UNDER THE INSTRUCTIONS OF MY CLIENT, HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT ALL THE CONTENTS OF THIS SERVICE APPEAL ALONG WITH APPLICATIONS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED FROM THIS

HON'BLE COURT.

ADVOCATE

Oath Commissioner Peshawai High Court



in Daf	Service	Anneal	No.	•	/2022
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Naqeeb Ullah

VERSUS

Superintendent of Frontier Reserve Police (SP- FRP)& Others

ADDRESSES OF PARTIES

APPELLANT:

Naqeeb Ullah S/O Ghulam Daraz, Ex-constable belt No. 5846 Frontier Reserve Police (FRP) Bannu, R/O Kotla Arsala Khan Ghoraiwala District Bannu.

RESPONDENTS:

- 1. Superintendent of Frontier Reserve Police (SP- FRP) Bannu Region Bannu.
- Commandant Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
- Deputy Commandant Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.

4. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

Through

ZAHIDUKLAH ZAHID

APPELLANT (

IFTIKHAR HUSSAIN SAMANDAR

Advocates, High Court.

Deans Trade Center Peshawar

In	Ref.	Service	Appeal	No.	/2022
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Naqeeb Ullah

VERSUS

Superintendent of Frontier Reserve Police (SP- FRP) & Others

PPLICATION FOR CONDONATION OF DELAY IF AN

APPLICATION FOR CONDONATION OF DELAY IF ANY ON BEHALF OF THE APPELLANT

Respectfully Sheweth:

- 1. That the titled appeal, along with the instant application is being filed in this Hon'ble court, wherein no date of hearing has yet been fixed.
- 2. That the applicant/appellant request for condonation of delay if any on the following grounds amongst others:

GROUNDS:

- A. That due to the grounds set out in the appeal, the condonation delay if any is in the best interest of justice.
- B. That contents of the appeal may kindly be considered as integral part and parcel of the instant application to condone delay if any for the best administration of justice.

- That applicant/appellant seriously ill and laid on the bed that's why the delay if any occurs all the medical documents attached with the appeal.
- That the impugned order is void -ab-initio and keeping in view the D. dicta of the superior courts on the principle of natural justice, "that times does not run against an illegal order", the appeal in hand is right in time.
- That since the appellant has not been served with any charge E. sheet, show cause notice, or has given any opportunity of personal hence all the proceedings kept secret from the applicant/appellant.

It is therefore most humbly prayed that on the acceptance of this application the delay if any found may kindly be condoned in the best intrest of justice.

relief Any other though specifically asked for to which the appellants is found entitled in the circumstances may also be granted.

APPLICANT/APPELLANT

Through

ZAHIDULLA ZAHID

IFTXKHAR∜HÚSSAIN SAMANDAR

.∕~^∕Advocates, High Court.

Affidavit

Khalid MahmV Oath Commission

Peshawar High Court

it is hereby solemnly affirm a declare on Oath that all the contents of this application are correct to the locat of my knowledge a biller. Deponent perified as instructed



		•			
ĺπ	Ref.	Service	Appeal	No	/2022

Naqeeb Ullah

VERSUS

Superintendent of Frontier Reserve Police (SP- FRP) & Others

APPLICATION FOR SUMMONING COMPLETE RECORD OF THE APPELLANT BEFORE PRELIMENARY HEARING OF THE APPEAL

Respectfully Sheweth:

It is submitted very humbly as under:

- 1. That the titled appeal is being filed today before this August court in which date of hearing has not been fixed as yet.
- 2. That since the applicant/appellant had been on bed due to serious illness for many years, hence he had been dismissed/discharged from service.
- That it is due to the said reason that appeal could not be filed in due time, hence an application for condonation of delay is delay is preferred along with appeal.
- 4. That an application was made to respondents No. 1 to 3 for providing of complete record of the appellant including complete file of inquiry proceedings, final show cause notice, departmental

appeal and its findings but not even a single document was provided to the appellant.

- That for the safe administration of justice and to achieve the ends 5. of justice complete record needs to be before the August court while diluting upon the application for condonation of delay.
- 6. That there is no legal impediment or hindrance while directing the respondents to place the same before this August Court, rather is in the best interest of justice.

It is therefore most humbly prayed that while allowing instant application the the respondents may kindly be directed to produce and place on file complete record of the appellant before holding preliminary arguments.

Anv other relief though not specifically asked for to which the appellants is found entitled in the circumstances may also be granted.

APPLICANT/APPELLANT

Through

ZAHIDULLA ZAHID

IFTIKHAR HUSSAIN SAMANDAR

Advocates, High Court.

(2)

Dr. Ahmad Rafi M.B.B.S. (Pesh) Fcps- I (Med) (Pak)

Dr. Ahmad Rafi Fcps-1 (Med) (Pak) mbex-work -MS mellycobil

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(14)

Dr. Ahmad Rafi M.B.B.S. (Pesh) Fcps-1 (Med) (Pak) P' Name Sex O Date 2.3-1 The Marian (30) Leuten uple Tolo Faciophi (20 Jerson Tel Mecidon To

M.T.I. D.H.Q TEACHING HOSPITAL, BANNU

(6)

Name:

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M.T.I. D.H.Q TEACHING HOSPITAL, BANNU

Out patient Department

Name: Name:

M.T.I. D.H.Q TEACHING HOSPITAL, BANNU

Out patient Department

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Who has facility the Medical Michael

And Teaching Hospital

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And The Superintendent

Medical Superintendent

(19)

Dr. Ahmad Rafi M.B.B.S. (Pesh) Fcps-1 (Med) (Pak)

(24)

DHQ Teaching Hospital Bannu Out Patient Department

برل ایند کار داید داسکولرسز جن سنن رونيسر واكثر حاوير نواب اليم بي بي الس الف ي في الس کارڈیواسکوٹر سرجری وارڈ لیڈی ریڈنگ ہیتال پیٹاور Name: Nog elvelle Age. 28] Dute. 5/8/16 Cheko -Intor

استنت رونيس واكثر حاويد وا المِ بِي بِي السِي الفِي السِي الْحَالِي كار ذيواسكولرسرجرى وار ذليذى ريْدنگ سپتال پيثاور Name Magebullat & Date 1918.16 Am Newsout ایم بی بالین کارهٔ بیروا کولرس این کارهٔ بیروا کولرس این کارهٔ بیروا کول ایس این کولرس این کول ایس این کول ایس این کول ایس این کی بیتال بیاور کارهٔ بیال بیاور میری وارهٔ لیدی ریدگی بیتال بیاور میری وارهٔ لیدی ریدگی بیتال بیاور میری که Name. Mane. Mane. میری که کارهٔ بیان کارهٔ بیان که کارهٔ کار

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Not Valid For Court

Attendant No: 0334-5322724

Reffered by Drismatullah sb

date14.02.17

Pain AND swilling rt UPPER LIMB

Colour Doppler scan Of RT UPPER limb.

U/S Of RT upper limb show NORMAL Cubital and brachial veins with normal colour flow,,,,,,Axillary vein is compressible with no visible thrombus formation but no flow is noted at all....Aterial system of the limb is normal.

CPINION....THE AXILLARY VEIN IS COMPRESSIBLE WITH NO. THROMBUS FORMATION BUT NO FLOW IS SEEN AT ALL..SO POOSIBILITY OF THROMBUS IN THE INTRATHORECIC PART 'S NOT EXLUDED,,,AND NEEDS CT ANGIOGRAPHY OF THE RT UPPER LIMB

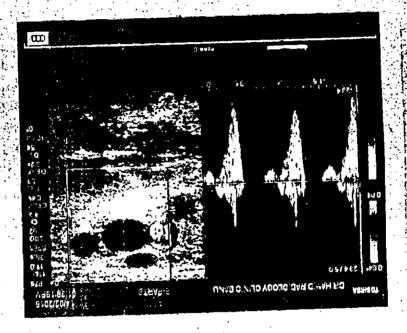
Dr Hamidullah Wazir

MBBS, MCPS (Radialogy)



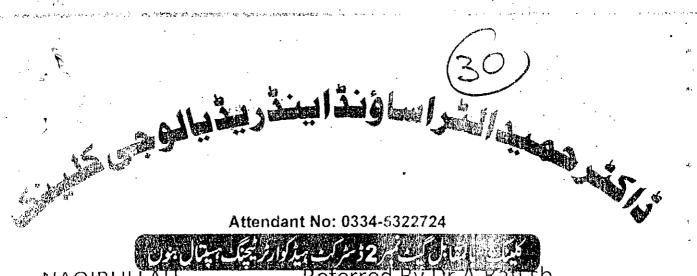
ڈاکٹر حدید اللّٰه وزیر الراساؤنلر، ایسرے۔ی ٹی سین اینڈایم۔آر۔آئی سیشلٹ ایمل کا کٹر دیاب، ایمی پالی الله وزیر الراساؤنلر، ایمل کا میں ایمل کا ایمل کا ایمان کی کی ایمان کی کی ایمان کی

40-6-2-41





(b3)



06.02.18

U/S ABDOMEN

Liver, Spleen and pancreas are normal. No solid or cystic Mass lesion seen.

CBD. Portal vein and intrahepatic vessels and biliary channels are normal.

Go is normally distended. No CALCULUS or signs of inflammation noted.

Both kidneys are Normal in size, shape and texture. No focal mass seen. No calculus or hydronephrosis seen.

U.bladder is normal.....no obvious lesion seen...............No free fluid/collection/pleural etfusion/pericardial effusion or enlarged lymph nodes seen.

Ry lower abdomen is tender. No mass or collection seen. NEEDS more clinical evaluation FOR GUT/Ceacal or APPENDICULAR PATHOLOGY

Opinion.....NORMAL U/S ABDOMEN

Dr Hamidullah Wazir

MBBS/MCPS

District Radiologist KGN.T.Hospital Bannu



دُّاكُتُّن حميد الله و زير الراساؤنذ، ايمريري أيكين ايندايم آر آن سيشلت ايمران بياب ايمن ايندايم آر آن سيشلت ايم الراي ايمن المراساؤند، ا

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REF. BY: DR			DATE: 6-2	<u>- 18 -</u>	
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TEST	RESULT	NORWAL	D. L. C		
☐ HB	Gm/%	M. 14 - 17 F. 12 - 15	☐ POLYMORPHS	70	%
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□ PLT	·/ /mm³	150-400 x 10 ³	☐ EOSINOPHILS	<u> 752 -</u>	%
□RBC	M/mm ³	M, 4.5 - 6.0 f, 4.5 - 5.5	☐ BASOPHILS	· /-	%
□ PCV	%	M. 40 - 54 f. 37 - 47	☐ MYELOBLASTS		%
□ MCV	fl.	77 - 93	☐ PROMYELOCTYES		%
□ MCH	pg.	27 - 32	☐ MYELOCYTES		%
□ MCHC	%	31 - 35	☐ METAMYELOCYTES		%
☐ RETICS	%	Adults 0.5 - 2 Infants 2 - 5	☐ BAND CELLS		%
□ B.T.	MIN.	1 - 9	☐ NORMOBLASTS NUCLEATEDRBCSs	/ 100	WBC
□ C.T.	MIN.	5 - 11	☐ RBC MORPHO	LOCY	
☐ Partial Thromboplastine Time SEC. 30 - 45 ☐ NORMOCYTIC		□ NORMOCYTIC NORM	JOCHROM	IC	
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□ PROTHROMNBIN (Control)	SEC.		□ MICROCYTOSIS		
☐ MALARIAL PARASITE			☐ MACROCYTOSIS		
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BLOOD GROUP ☐ ANISCYTOSIS

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Orthopaedic Surgeon

Professor Dr. Asmatullah Marwat

M.B.B.S, - F.C.P.S (Ortho)

32

ORTHOPAEDIC SURGERY

Bannu Medical College Bannu Khalifa Gul Nawaz Teaching Hospital Bannu

P.Name's	ebullah- Age 6 y sex 1 bate 2 2018
<u> Clinical Record</u>	
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Swel	LP Rt-Shoulder, Arm & Jevenn
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Prof. Dr. Riaz Anwar Khan

MBBS MSc (Glasgow) FRCS (Glasgow) FRCS (Dublin) FACS (USA) FCPS (Cardiac Surgery) DIP: HPE

Professor Head of Department Gardiovascular Surgery Post Graduate Medical Institute, Lady Reading Hospital, Peshawar. Ph: 9211430 Ext: 3085-3086 E-mail: rakcvs@hotmail.com

معلومات اورنمبر كيليح Mob: 0300-5302924

Cardiovascular Surgeon

CLINIC: Pak Medical Center & Hospital Near Wapda Grade Station, Khyber Bazar Peshawar. 2nd Floor Room # 215.

02/18

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كلينك ياك ميذيكل سنترايند باسبيل مز دوايدا گريدشيش خيبر بازار پيثاور ، دوسري مزل كمره تمبر 215



Page No: 1

Northwest General

Name: NAOEEB ULLAH

Reg#: 021804430

Age: 26-Year(s)
Gender: Male

Specimen: 15-Feb-2018 07:19 PM

Report: 15-Feb-2018 08:19 PM

Sector A-a, Privac Milhayata (1917) - India Fra (1911) 1563060 Fz - 1917 - India Fra (1911) 1563060 Fz - 1917 - India Fra (1916) India Fra (19

0218-13792

Northwest General Hospital

CREATININE

Creatinine

1.21 mg/dl

02-1.2

eGFR

77.04 mL/Min/1.73m^2

LABORATORY

60-125

This is electronically verified document and does NOT require sign / stamp.

Mester

- 1 (**188**0) **18**0 (1880) (188

North West General Hospital & Research Centre

INVOICE

Invoice #: MR 0218-13949 #:021804430

Patient: NAQEEB ULLAH

Age /

* , * * * * *

Gender: Contact 26-Year(s) / 03339737503

Male:

Address: BANNU

Invoice

Commented the second of the se

Booking: Date: 09:03 AM 16-Feb-2018

s.No Test Amount

Chest

With

8,800,00 Contrast

(CT)

Total: 8,800.00

For online result please visit http://nwgh.pk:: Hospital Online Service :: Patient Report

This is computer generated mvoice, electronically verified and does not need sign and o: ջննախ.

Invoice can be refunded only in 15 days,

PATIENT COPY

Pyright @ 2018, Power 1 by . □ GH & RC



DEPARTMENT OF

Sector A-3. Phase-V. Havatabad, Peshawar. U.A.N #: (091) 111-583-880 Ph: 091-5838800. Fax: 091-5822620. Email: radiology@nwgh.pk, Web: www.nwgh.pk

A project of ALLIANCE HEALTHCARE (Pvt) Ltd.

Name: NAQEEB ULLAH

Reg No: 021804430

Age: 26-Year(s)

Performed: 16-Feb-2018

0218-13949

Gender: Male

Reported: 16-Feb-2018 10:51 AM

Ref By: Self

CT SCAN CHEST WITH CONTRAST

TECHNIQUE:

3 mm contiguous slices are taken from apex to base of the lungs. Mediastinal & Lung windows are viewed: IV contrast is given.

CLINICAL DATA: No flow in right axillary vein on doppler ultrasound.

FINDINGS:

There is non opacification of right axillary, subclavian vein with contrast, however right axillary and subclavian artery, internal jugular veins, SVC, contralateral axillary vessels appears unremarkable.

Mild stranding is noted in right axilla.

Lung parenchyma shows normal texture. No focal lesion or mass is detected.

No mediastinal mass or lymphadenopathy is detected.

Mediastinum is normal in position. Trachea and main bronchi are normal.

No chest wall or pleural-based lesion or mass is detected.

No pleural effusion is seen.

IMPRESSION:

Non opacification of right axillary, subclavian vein with contrast-suggesting thrombosis however no mediastinal mass seen,

Reported By:

Dr. Adnan Ahmed MBBS, FCPS (Diagnostic Radiology)

(This is electronically verified report and does not require signature)

Prof. Dr. Riaz Anwar Khan

MBBS MSc (Glasgow) FRCS (Glasgow) FRCS (Dublin) FACS (USA) FCPS (Cardiac Surgery) DIP: HPE



Pak Medical Center & Hospital Near Wapda Grade Station, Professor Cardiovascular Surgeon Head of Department Cardiovascular Surgery Khyber Bazar Peshawar. Post Graduate Medical Institute, 2nd Floor Room, # 215. Lady Reading Hospital, Peshawar. Hi: 9211430 Ext: 3085-3086 E-mail: raķcvs@hotmail.com ven Thrombosis Jas. Lowplat -plus ETEL



"Your Health Our Miss

Pak Medical Centre & Hospital, Khyber Bazar Peshawar. Ph: 091-2560005-7

Consultant Dr. M. Ismail MBBS.DCP (Pathologist) Assit Professor (Suit)
Dr. Nasir Ali
SPECIALIST BMS(UK) MIBMS(UK) RPH (FK)

Khalid Khan BS, MS (Microbilogist)

Name:

NAQIB ULLAH

PRN: 18-3626

Lab ID:

60,197

Gender:

MALE

Sampling Date: 22-02-2948 07:00PM

26

Result Date:

22-02-2018 07:42PM

Age: Ref. by:

Dr. Riaz Anwar Khan

Specimen:

ELOOD

Investigation:PT INR

RESULT

NORMAL RANGE

PT INR

TEST .

Patient

24 Sec

Control

14 Sec

INR

1.7

Assit Professor (Suit) DR. NASIR ALI SPECIALIST BMS(UK) RPH(Pak) MIBMS(UK)

MICROBIOLOGIST KHALIC(KHAN B.S M.S

All Queries / Discrepancies, if any, may be referred to our lab, within 24 Hrs. Reporting for re-evaluation/ confirmation.

Note: See Reverse for term & Conditions.





Your Health.....Our Mission

Pak Medical Centre & Hospital, Khyber Bazar Peshawar. Ph.: 091-2560005-7

Consultant Or. M.Ismail MBBS.DCP (Pathologist)
Assit Professor (Sult)
Dr. Nasir Ali
SPECIALIST BMS(UK)MIBMS(UK) RPH(PK)
Khalid Khan
BS.MS (Microbiologist)

BS-MS (Microbiologist)

Name:

NAQIB ULLAH

MALE

Age:

26

Ref. by:

Gender:

Dr. Riaz Anwar Khan

Investigation:PT INR

PRN: 18-5630 Lab ID:

61,917

Sampling Date: 20-03-2018 06:59PM

Result Date:

20-03-2018 07:06PM

Specimen:

BLOOD

TEST	RESULT	NORMAL RANGE
PT INR		
Patient	18 Sec	•
Control	14 Sec	
INR	1.2	·

Assit Professor (Suit) DR. NASIR ALI SPECIALIST BMS(UK) RPH(PAK) MIBMS(UK)

MICROBIOLOGIST KHALID KHAN B.S M.S

All Queries / Discrepancies, if any, may be referred to our Lab. within 24 Hrs. Reporting for re-evaluation / confirmation.

Note: See Reverse for term & Conditions.

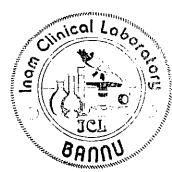
Cunical Logo

Spoosite Gate No: 2 District Neodquarter Hospital, Bannu.

Consultant

Dr. Ilyas Hussain Shah

M.B.B.S, R.M.P.



Phone: 0928-611538

القائل كر وفراك من كار فر مين الرياد الم

Patient Name; Naqib Ullah

Sex M

Specimen Blood

Ref.By Dr

T/Req. PT INR

Date 5 April 2018

PT INR Test

Prothrombin Time

20 Sec.

Prothrombin Control

15 Sec.

INR

1.46

Zenstine.

Now the following tests facilities are available by Elisa.

IIBs Ag ,HCV ,Hiv & Hormonal Tests.



SHAH NOOR MEDICAL LABORATORY



Histopathologist:

Dr. Muhammad Sajjad
M.B.B.S, D.C.P. F.C.P.S
Associate Professor Pathology
Bannu Medical College

Code No ;

P. Name: Nagib Ullah

Age:/Gender: M

Specimen Blood

Ref By

Test Req: : P.T INR

Date: 24 April 2018

COAGULATION PROFILE.

Prothrombin Time (P.T)

15 Seconds.

Control

14 Seconds.

INR

1.0

Dr:M.Sajjad Pathologist

TFTs, Free T4, Free T3, LH, FSH, Prolactin, Beta HCG Ferritin, PSA

.electrolytes, HbA1c, BIOPSY, FNAC, PAP SMEAR, CSF & other body fluid R/E for malignant Cells, Sp Smear, Urine & Pus C/Sensitivity, CRP, Anti DNA, ANF P.T. APTT, G6PD, TPHA, HIV HBs HCV Screening. & ELISA Method. H. Pylori antibodies, Typhidot, PSA, Lipid Profile, G.T.T LFTs, KFT Test facilities are available.

Railway Road Near National Bank Bannu. Ph: 0928-660236 Email: shahnoor.lab41@gmail.com

Prof. Dr. Riaz Anwar Khan

MBBS MSc (Glasgow) FRCS (Glasgow) FRCS (Dublin) FACS (USA) FCPS (Cardiac Surgery) DIP: HPF

Professor Head of Department Cardiovascular Surgery Post Graduate Medical Institute, Lady Reading Hospital, Peshawar. Ph: 9211430 Ext: 3085-3086 E-mail: rakcvs@hotmail.com

Cardiovascular Surgeon

NAREEB Weak

CLINIC; Pak Medical Center & Hospital Near Wapda Grade Station, Khyber Bazar Peshawar, 2nd Floor Room # 215,

مانة الألاكان الماني الماني

Sunny Medical Laboratory (Regd)
No-HRA/500/R/PR/LAB/757
All Medical Center Opp: L.R.H. O.P.D Gate Peshawar.
Mobile: 0343-9000798 - 0333-9393664



CONSULTANT Dr. Shams ur Rehman M.B.B.S



NAQIB ULLAH.

SEX

MALE

REFERED BY

SELF.

AGE

TEST REQUIRED PT.INR.

DATE

25-06-2018

REPORT

PT	RESULT
CONTROL	12 SECONDS
PATIENT	14 SECONDS
INR	(1.18)

TECHNOLOGIST:

Dr. Shams ur Rehman M.B.B.S

All queries/Discrepancies if any may be referred to our lab. Within 24 hrs. Of reporting for re-evalution / confirmation



ILYAS MEDICAL L

ABORATORY
Redistration No: HRA/500/F/BU/LAB/13

OPP: DHQ HOSPITAL GATE No.1 D.I. KHAN ROAD, BANNU. Ph: 0928-614311 Branch 2: OMNI Health Care Center Opposite DHQ Hospital Gate No:1 Bannu

E-mail:ilyas_lab@yahoo.com

-	******				
	PATIENT NAME	NAQEEB ULLAII	AGE/SEX	TRSM	-
	REF BY	DR JAVED NAWAB SB	DATE	8-Jul-18	-
	EXAM REQ	PT, INR.	TIME	10:35:59 AM	
	SPECIMEN	BLOOD.	LAB NO	1311 202-7	•

COAGULATION PROFILE

TEST NAME	RESULT	NORMAL VALUE
PT	21 Sec	CONTROL 14 Sec
i .		, ,
INR	1.89	0.80 - 1.10

REMARKS:

Lab. Technologist SHAH NIAZ KHAN DMLT, MF Peshawar Mob. 0334-8811476

Lab. Technologist
M. ILYAS
B.S (Hons) (MLT) KMU, (Peshawar)
F.Sc. (MLT), PIMS (Islamabad)
Lab. Tech. KGNTH Bannn
Mob: 0301-8081310

73.13.15H.FSH.LH.PROLACTIN.FERRITIN.ALBUMIN.HBA1C.Ami. CCP.B.
Hematology (20 Parameters) Electrolytes (6 Parameters) ELISA Thir Routine Chemistry, Serology, Immunology, Block Banking J

itool H.Pylon, Dengue, CRP. Ion, Hormone Analyzer. & Microbiology

Jyas Medical Laborato Registration No: HRA/05599





OPP: DHQ HOSPITAL GATE No.1 D.I. KHAN ROAD, BANNU. Ph: 0928-614311 Branch 2: Azad Poly Clinic Opposite DHQ Hospital Gate No:1 Bannu E-mail:ilyas_lab@yahoo.com

Not Valid For Court

PATIENT NAME	NAQEEB ULLAH.	AGE/SEX	? YRS/ M
REF BY	DR JAVED NAWAB SB.	DATE	5-Aug-18
EXAM REQ	PT, INR.	TIME	8:43:18 AM
SPECIMEN	BLOOD.	LAB NO	IML111-8

TEST NAME	RESULT	NORMAL VALUE
PT	30 Sec	CONTROL 14 Sec
(-		
INR	2.78	0.80 – 1.10

REMARKS:

SHAH MAZKHAN DMLT, MF Peshawar

Bio Chemist
M. Tufique

Lab. Technolologist Najeeb Khattak MLT Peshawar Lab. Tech. KGNTH

Lab. Technologist
M. ILYAS
B.S (Hons) (MLT) KMU, (Peshawar)
F.Sc. (MLT), PIMS: (Islamabad)
Lab. Tech. KGNTH Bannn
the Rest 140 Mob: 0301-8081310

Tiyas Medical Laboratory

Registration No: HRA/05599





OPP: DHO HOSPITAL GATE No.1 D.I. KHAN ROAD, BANNU. Ph. 0928-614311 Branch 2: Azad Poly Clinic Opposite DHO Hospital Gate No.1 Bannu E-mail:Ilyas_lab@yahoo.com

Not Valid For Court

PATIENT NAME	NACREBANA		
	NAQEEB ULLAH.	AGE/SEX	2 VDS/M
REF BY	DR JAVED NAWAB SB.		
EXAM REQ		DATE	19-Aug-18
DAAN REQ.	PT, INR.	TIME	12:29:29 PM
SPECIMEN	BLOOD.		12:29:29 [1]
	19 DOOD.	LABNO	IML538-8

TEST	NAME		RESULT	NORMAL VALUE
PT			24 Sec	CONTROL 14 Sec
		٠٠٠ اور الت		
INR .			2.21	0.80 - 1.10
			<u> </u>	

REMARKS

Lab. Technologist SHAH NIAZ KHAN DMLT, MF Peshawar Bio Chemist

M. Tufique

M.Sc. (Chemistry)

Blochemist KGNTH

Lab. Technolologist
Najeeb Khattak
MLT Peshawar
Lab. Tech. KGNTH

Lab. (fechoetogist M. ILYAS B.S (Hons) (MLT) KMU, (Peshawar) F.Sc. (MLT), PIMS (Islamabad) Lab. Tech. KGNTH Bannn Mob: 0301-8081310

14 ISH ESH I MPROLACTIV BERRITIV ALBUMIN HEA IC AMI CC ABre Hoc Stool Haver Dengue GRA Hematology (20 Parameters) Electrolyas (c) Plameters (Elecky Infra sensiblion Hormons Analyze. Rolling Chemistry (Serology), immurology, Block Banking, Hematology, & Microbiology

Prof. Dr. Riaz Anwar Khan

(47)

MBBS MSc (Glasgow) FRCS (Glasgow) FRCS (Dublin) FACS (USA) FCPS (Cardiac Surgery) DIP: HPE

Professor Head of Department Cardiovascular Surgery Post Graduate Medical Institute, Lady Reading Hospital, Peshawar. Ph. 9211430 Ext. 3085-3086 E-mail: rakcvs@hotmail.com

Cardiovascular Surgeon

CLINIC; Pak Medical Center & Hospital Near Wapda Grade Station, Khyber Bazar Peshawar. 2nd Floor Room # 215.

Date: 18 / C

مفته الواركوكلينك بندلم بعا-

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Tab Pykeiget

Prof. Dr. Riax Apwar Khar From Marg) FRCS(U) FACS (USA) Fons (Cardiac Surgery) Dip: HPE Cardianascular Surgeon Profil Lady Reading Hospital, Pschawar

. معلومات اورنمبر كيليّ Mob: 0300-5302924 .

كلينك : پاك ميڈيكل سنٹرانيڈ ہاسپلل نز دواپڈاگر پُرششن خيبر بازار پثاور، دوسري منزل كمره نمبر 215

Prof. Dr. Riaz Anwar Khan

MBBS MSc (Glasgow) FRCS (Glasgow) FRCS (Dublin) FACS (USA) FCPS (Cardiac Surgery) FRCP (Edin) DIP: HPE

(48)

Professor A Head of Department Cardiovascular Surgery Post Graduate Medical Institute, Lady Reading Hospital, Peshawar. Ph: 9211430 Ext: 3085-3086 E-mail: rakcvs@hotmail.com

Cardiovascular Surgeon

Vagibullal. 5?

CLINIC;
Pak Medical Center & Hospital
Near Wapda Grade Station,
Khyber Bazar Peshawar.
2nd Floor Room # 215.
Date:

مفته والواركوكلينك وتدريت ال

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2 montes.

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3P2139/80-M8

20/2/19

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Tab laxotimis

Prof. Dr. Riaz Anwar Khan MBBS, M.Sc(G) FRCS(D) FACS (USA) FCPS (Cardiac Surgery) Dip: HPE Cardiovascular Surgeon Surgery PGMI Lady Reading Hosp.tal. Peshawar

معلومات ادر تمبركيك 10-5302924

كلينك: ياك ميذيكل سنشراين لا مسبطل نز دوا پذاگر يُدشيشن خيبر بازار پشاور، دوسري منزل كمره نمبر 215





Your Health Our Mission

Pak Medical Cantre & Hospital, Khyber Bazar Peshawar.

Consultant
Dr. M. Ismail
MBBS.DCP (Pathologist)
Assit Professor (Suit)
Dr. Nasir All
SPECIAUST BMS(UK) MIBMS(UK) RPH (PK)

NAQIB ULLAH Name:

Gender: MALE Age:

28

Ref. by:

Dr. Riaz Anwar Khan

Investigation:PT INR

PRN: 19-3253

Lab ĺD:

80,856

Sampling Date: 13-02-2019 04:18PM Result Date:

13-02-2019 04:41PM

3LOOD

TEST

RESULT

NORMAL RANGE

PT INR

Patient^{*}

20 Sec

Control

14 Sec

INR

1.4

Assit Professor (Suit) DR. NASIR ALI SPECIALIST BMS(UK) RPH(Pak) MIBMS(UK)

MICROBIOLOGIS KHALID KHA B.S.M.S

All Queries / Discrepancies, if any, may be referred to our lab, within 24 Hrs. Reporting for re-evaluation/ confirmation.

Note: See Reverse for term & Conditions.





MEDICAL ABORATORY

Not Valid For Court

	00
/SEX	? Yrs / M
E	10-Apr-19

PATIENT NAME	ØNAQ1B ULLAH.	AGE/SEX ? Yrs / M
REF BY	OPD.	DATE 10-Apr-19
EXAM REQ .	PT,INR.	TIME 9:23:23 AM
SPECIMEN	BLOOD.	LAB NO IML474/04

TEST NAME

RESULT

NORMAL VALUE

PT	17 Sec	CONTROL 14 Sec
		• .
	V	

INR	1.33 ,	0.80 - 1.10

REMARKS:

SHAH NIAZ KHAN DMLT, MF Peshawar Mob: 0334-8811476

Lab. Technologist
M. ILYAS
B.S (Hons) (MLT) KMU, (Poshawar)
F.Sc. (MLT), PIMS (Islamahad)
Lab. Fech. KGNTH Bannn
Mob. 0301-8081310





Pak Medical Centre & Hospital, Khyber Bazar Peshawar. Ph: 091-2560005-7

Consultant
Dr. M. Ismail
MBBS.DCP (Pathologist)
Assit Professor (Suit)
Dr. Nasir Ali
SPECIALIST BMS(UK) MIBMS(UK) RPH (PK)

Khalid Khan

BS. MS (Microbilogist)

Name:

NAQEEB ULLAH

PRN: 19-16078

Lab ID:

Gender:

Sampling Date: 20-06-2019 05:26PM

MALE

Age: Ref. by: Ź8

Investigation:PT INR

Dr. Riaz Anwar Khan

Result Date: 20-06-2019 06:03PM

Specimen:

BLOOD

TEST

RESULT

NORMAL RANGE

PT INR

Patient

18 Sec

Control

14 Sec

INR

1.2

Assit Professor (Suit) DR. NASIR ALI SPECIALIST BMS(UK) RPH(Pak) MIBMS(UK)

MICRÓBIOLOGIST КНАЫД КНАЙ

All Queries / Discrepancies, if any, may be referred to our lab, within 24 Hrs. Reporting for re-evaluation/ confirmation.

Note: See Reverse for term & Conditions.

Prof. Dr. Riaz Anwar K MBBS MSc (Glasgow) FRCS (Glasgow) FRCS (Dublin) FACS (USA) FCPS (Cardiac Surgery) FRCP (Edin) DIP: HPE Professor CLINIC; Pak Medical Center & Hospital **Head of Department** Cardiovascular Surgeon Cardiovascular Surgery Near Wapda Grade Station, Post Graduate Medical Institute, Khyber Bazar Peshawar. 2nd Floor Roorg # 215. Lady Reading Hospital, Peshawar. Ph: 9211430 Ext: 3085-3086 E-mall: rakcvs@hotmail.com Vagib ullah...
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Dage. 289.

Subclaman Newsbackers Parkaches Parkaches Por extressi loss of sleep

Prof. Dt. Riaz Naway Char MEBS, MISSIGN FROM LITTERS (UTIVA) FORS (Cardian Surgery) Dip. MRE Carrier Isration Surgery A Star of School Prolawar

معلومات اورنمبر كبلت Mob: 0300-5302924

^{سیف}ل نز دوایڈ اگریڈ شیش خیبر بازاریشاور، دوم Jals MAGED.

25/06/11

Prof. Dr. Riaz Anwar Khan



MBBS, MS (Glasgow) FRCS (Glasgow) FRCS (Dublin) FACS (USA) FCPS (Cardiac Surgery) FRCP (Edin) DIP: HPE

Professor
Head of Department
Cardiovascular Surgery
Nowshera Medical College
Qazi Hussain Ahmed
Medical Complex Nowshera
Ph. 0923-9220330
E-mail: rakevs@hotmail.com

Cardiovascular Surgeon

Nagit - Illah

CLINIC; Pak Medical Center & Hospital Near Wapda Grade Station, Khyber Bazar Peshawar, 2nd Floor Room # 215.

ate: 10 3/2020

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P Tab

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Rokap-40mg

120/30



"Your Health Our Mission

Medical Laboratory

Pak Medical Centre & Hospital, Khyber Bazar Peshawar. Ph. 091-2560005-7

Consultant Dr. M.Ismail MBBS.DCP (Pathologist) Assit Professor (Suit)

Or. Nasir Ali

SPECIALIST BMS(UK)MIBMS(UK) RPH(PK)

Khalid Khan

MAGGLEBUILAM

Quadet:

Ago, S

30.

Řef. by:

Dr. Biaz Anwar Khan

Investigation:PT INR

PRN: 20-7445

Lab ID:

Sampling Date: 10 03-2020 02 23PM

Result Date:

10-03-2020 02:41PM

Specimen:

BLOOD.

TEST

| 10 mm | 10

RESULT

22 Sec

NORMAL RANGE

P14MR.

Patient

is all

4111

14 Sec

1.5

Assit Professor (Suit) DR. NASIR ALI SPECIALIST BMS(UK) RPH(PAK) MIBMS(UK)

MICROBIÓLOGIS KHALID KHAN B.S M.S

All Queries / Discrepancies, if any, may be referred to our Lab. within 24 Hrs. Reporting for re-evaluation / confirmation.

Note: See Reverse for term & Conditions.

<u>ORDER</u>



My this order shall disposed of departmental proceedings pending against Constable Nageeb ullah No.5846/FRP as the official had committed the tollowing omissions and commissions.

- Reported to have found absent from duty while deployed at Police Strain City ١. District Haripur vide daily diary 210.35 dated 19-10-2015 without any leave or valid permission of the authority and reported back on 18-11-2015.
- Besides the above again absent from duty while posted at Judicial Complex Bannu vide daily diary No.15 dated 19-11-2015 up to date without gening any Atteste leave or legal permission of the superiors.

On the above charges accused official was charge sheeted basea on summary of allegations & SI/PC Satar Klian was nominated as Enquiry Officer with the directions to make probe into the matter within stipulated period.

A discreet probe was made by the Enquiry officer and submitted his findings wherein it was reported that charge sheet was properly served upon him on 30-05-2016 but defaulter official did not submit reply to the charge sheet within stipulated period, subsequently a Final Show Cause Notice of Major Punishment including dismissal from service was issued which was properly served upon him on 22-06-2016, but he also failed to submit his reply to the said notice nor bother to make his arrival at his duty Accused official remained away from duty for the total period of (29) days and after it mark absent from duty w.e.from 19-11-2015 till to date without any lawful permission even no information conveyed to the superiors regarding his long absence.

Enquiry Officer submitted his report dated 11/07/2016, wherein defaulter official was reported to have willful and habitual absentee malinger type official and seems to be not interested to continue further service. He was also repeatedly summoned to appear before the undersigned but till date he failed to do. Finally he was rendered guilty for the allegations leveled against him and recommended him for taking ex-parte action mentioned in section (4) of the final show cause notice being not taking interested in his service.

Keeping in view the recommendation of the enquiry officer, Now therefore, I, MOHAMMAD SHAHFIO KHAN Superintendent of Police, FRP Bunnur, in exercise of the powers vested in me under Police Rules 1975, do hereby impose the Major Punishment i.e. Discharge from service from the Date absence upon the above named accused official with immediate effect.

OB No. 274

Dated: 11/07/2016.

Copy to all concerned

57 67 67 75 TO

FRP Bannu

This order will aspece of the departmental appeal preferred u, E : regulative Naggeb Ullah No. 5846 of FRP Earou Hange lagainst terriorder of SP FRP Harma Range. Bannu issued vide OB No. 274, detoil 11 07 2016; wherein he was availed major punishment of discharged from service. The applicant was precauded against on the altegations that he absented himself from lawful duty with effect from 19.10.2015 to 18 11 2015 and 19 11 2015 till the date of discharged from service (e. | 1.07 2016 for tells) period of 08 months & 22 days, without any leave or short permission of the competent authority

to this regard, he was usued Charge Sheet alongwith Summary of Allegations and SEPG Sattar Istigit of FRP Bannu Range was nonlinated na Engulty Officer to unpartn the actual facts. The Enginty Officer submitted his findings, wherein it was reported mat the Charge Sheet was properly served upon him on 20 c5 2016, but defaulter chicin, and not subject tepty with a stipulated period. Subsequently a rail Show Comes Worker was issued and served upon him on 22.05 2016, but he also tailed to satisfy him high, bother to make his arrival at his duty even no trive compositively extension as \$19.0000 regarding his protong absence. The Engulry Officer between operation in his tending in that a_{ij} accused official is a willful and habitual absentee, malinger type official and secure to be not interested to continue further service in Police Department. He was also repealed a summoned to appear before the competent authority but he did not turn up. Finally he was rendered guilty of the charges leveled against from and recommended for talling ex-pade action by the Endury Officer

Recoing in view the above painted fasts and other material available on record, be was awarded major cumstiment of declining in tions വൗയമാ ഉപ നില് നോള് വ dated 11 07,2015

Feeling aggrieved against the impugnist or set of SE FRP grants Range. Bannu the applicant preferred the instant appeal. The applicant was secumented and

heard in person in Cidarly Room held on 12 11 2020.

Diring the course of personal hearing; the applicant falled to increase acceptance justification regarding his innocence. From perusal of enamity flo dillusi become from their the allegations were fully established adminst him during the course of enginy. They the applicant has been found to be an irresponsible person in rater disregard their discipline of the force. Therefore any lensency or compliancency would further embedded the actioned inflicer and impinge upon the adversely on the ever all discipline and conduct of the torac-From perusal of record the instant appeal is found harly time harried decar more there is t years, it is settled proposition of taw that law helps the deligent and not exist it. Hour the to goesn't seem any infimity in the order passed by the computent main rety, the here's na grounds => stato interfere in same

Based on the Indorgs corraled above I Malik Muhampishi Tariq Pulls, Donaty Commandant FRE Espher Pallifordiwa, Forhawar being the conductors authority, has found no subultinge in the appear, therefore, the same is reversely to make a

being more easily badly based

Order Announced

Deputy Tille To: Company to

Ployber Hakhtimston, Fluids

tin///25 (32/5) Legal, dated Peshawar the 3/ 1/2 /2020

Copy of above is forwarded for information and necessary nation to :

SP PRO Barrio Range, Barrio. His service record and Diffe sont here were

Sectional Name of Ultra No. 5846 Sty Children Datas Khari Ric Missing P. Juneary Kippoli P. O. Olimpire World (Bodinst Berling)

ORDER

Better Capy



This order will dispose of the departmental appeal preferred by Ex-constable Naqeeb Ullah No. 5846 of FRP Bannu Range against the order of SP FRP Bannu Range Bannu issued vide OB No.274 dated 11.07.2016, wherein he was awarded major punishment of discharged from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 19.10.2015 to 18.11.2015 and 19.11.2015 till the date of discharged from service i.e. 11.07.2016 for total period of 08 months & 22 days without any leave or prior permission of the competent authority.

In this regard he was issued Charge Sheet along with summery of allegations and SNPG Sattar Khan of FRP Bannu Range was nominated as Enquiry Officer to unearth the actual facts. The Enquiry Officer submitted his findings wherein it was reported that the Charge Sheet was properly served upon him on 30.05.2016 but defaulter official did not submit reply within stipulated period. Subsequently show cause notice was issued and served upon him on 22.06.2016, but he also failed to submit the reply nor bother to make his arrival at his duty even no information conveyed to the superior regarding his prolong absence. The Enquiry Officer reported in his findings that the accused official is a willful and habitual absentee, malinger type official and seems to be not interested to continue further service in Police Department. He was also repeatedly summoned to appear before the competent authority but he did not turn up finally he was rendered guilty of the charges leveled against him and recommended for taking ex-parte action by the Enquiry Officer.

Keeping in view the above narrated facts and other material available on record he was awarded major punishment of discharging from service vide OB No. 274 dated 11.07.2016.

Feeling aggrieved against the impugned order of SP FRP Bannu Range Bannu, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 12.11.2020.

During the course of personal hearing the applicant failed to present any justification regarding his innocence. From perusal of inquiry file it has been tuned that the allegations were fully established against him during the course of enquiry. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer impinge upon the adversity on the overall discipline and conduct of the force. From perusal of the record the instant appeal is found badly time barred about more than 04 years. It is settled proposition of law that law helps the diligent and not indolent. Thus there doesn't seem any infirmity in the order passed by the competent authority therefore no grounds exist to interfere in same.

Based on the findings narrated above, I Malik Muhammad Tariq PSP, Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar being the competent authority has found no substance in the appeal therefore the same is rejected/dismissed being meritless & badly time barred.

Order Announced

Signed Deputy Commandant For Commandant FRP

Khyber Pakhtunkhwa Peshawar

No. $\underline{11195}$ of / SI Legal, dated Peshawar the $\underline{01}$ $\underline{1/2/2020}$.

Copy of above is forwarded for information and necessary action to the:

- 1. SP FRP Bannu Range Bannu. His service record and D file sent herewith.
- 2. Ex-constable Naqeeb Ullah No. 5846 S/O Ghulam Daraz Khan R/O village Kotla Azeem Khan PO Ghoree Wala District Bannu.

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Notice 62

TO

Superintendent of Frontier Reserve Police (SP- FRP) Bannu Region Bannu.

Commandant Frontier Reserve Police Bannu Region Bannu.

Deputy Commandant Frontier Reserve Police Bannu Region Bannu.

Take notice under Rule 11 of Khyber Pakhtunkhwa Service Tribunal Rules 1974, that we are going to file an appeal against the order of discharge from service of the appellant.

(Copies of grounds of appeal along with annexures attached with the notice.)

ZAHIDULLA ZAHID

IFTIKHAR HUSSAIN SAMANDAR

Advocates, High Court

Atteted

Notice



Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

Take notice under Rule 11 of Khyber Pakhtunkhwa Service Tribunal Rules 1974, that we are going to file an appeal against the order of discharge from service of the appellant.

(Copies of grounds of appeal along with annexures attached

with the notice.)

ZAHIDÚLLA ZAHID

IFTIKHAR HUSSAIN SAMANDAR

Advocates, High Court

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