

21.04.2022

Miss. Uzma Syed, Advocate junior of learned counsel for the appellant present.


Former requests for adjournment on the ground that learned senior counsel is busy before the Peshawar High Court, Peshawar. Adjourned. To come up for preliminary hearing on 03.06.2022 before S.B.

  
(MIAN MUHAMMAD)  
MEMBER(E)

3<sup>rd</sup> June, 2022

Counsel for the appellant present.

Learned counsel for the appellant sought adjournment to further prepare the brief. Last opportunity granted. To come up for preliminary hearing on 15.06.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

15<sup>th</sup> June 2022

Junior of learned counsel for the Appellant present and seeks adjournment as senior learned counsel is not available today. Last chance is given for preliminary hearing. To come up for preliminary hearing on 03.08.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

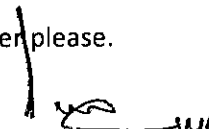


RECORDED  
INDEXED  
Peshawar

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 7797/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/11/2021	<p>The appeal of Mr. Rafiullah Khan resubmitted today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	8-2-2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>08/02/22</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 21-04-2022</p> <p> Reader.</p>

The appeal of Mr. Rafiullah S/O Badshah Khan, Ex-C-No-3880/3032, P. No. 75, FRp Hqrs, R/O Lewan Daradariz, District Bannu received today i.e. on 27.10.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of enrollment order and commendation certificate in respect of appellant is not attached with the appeal, the attached enrollment order and commendation certificate is of Badshah Khan.

No. 2151 /S.T,

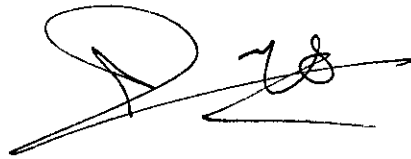
Dt. 27-10 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

SaadUllah Khan Marwat Adv.  
Highcourt Peshawar.

Sir

Re-submitted after removing  
the objections.



# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

## CHECK LIST

Case Title: Rafiqullah Khan

v/s

Police Department

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
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?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
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 _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

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

Name: Saad Ullah Khan Marwat

Signature: [Signature]

Dated: 27-10-21

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. 7797/2021

Rafi Ullah Khan

versus

Commandant & Others

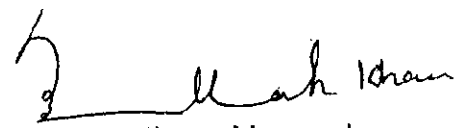
**INDEX**

SCANNED  
KPSVT  
Peshawar

S. No	Documents	Annex	P. No.
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3.	Summary of allegations	"B"	5
4.	Medical Reports	"C"	6-18
5.	Removal Order dated 30-06-2019	"D"	19
6.	Representation 06-08-2021	"E"	20
7.	Rejection Order dated 22-09-2021	"F"	21
8.	Application for Copies dt 14-10-2021	"G"	22

Appellant

Through

  
Saadullah Khan Marwat  
Advocate.

21-A Nasir Mansion,  
Shoba Bazaar, Peshawar.

Ph: 0300-5872676

0311-9266609

Dated.26-10-2021

**BEFORE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. 7797/2021

Rafiullah Khan S/o Badshah Khan  
R/o Lewan Daradariz, Bannu.  
Ex-C-No-3880/3032, P. No. 75  
FRP Hqrs, Peshawar . . . . . Appellant

**VERSUS**

1. Deputy Commandant,  
FRP, KP, Peshawar.
2. Commandant FRP,  
KP, Peshawar. . . . . Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974  
AGAINST ORDER NO. 1073-76 DATED 30-06-2009 OF  
R. NO. 01 WHEREBY APPELLANT WAS REMOVED  
FROM SERVICE FROM THE DATE OF ABSENCE 01-12-  
2008 RETROSPECTIVELY OR ORDER NO. 7614-16/15  
DATED 22-09-2021 OF R. NO. 02 WHEREBY  
DEPARTMENTAL APPEAL OF APPELLANT WAS  
REJECTED:**

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**Respectfully Sheweth;**

1. That on 15-07-2007, appellant was enlisted as constable and served the department to the best of the ability and to the entire satisfaction of the superiors. In recognition of his best performances, he was awarded with commendation certificates. (Copy as Annex "A")
2. That without any date and number, appellant was served with statement of allegations and not with Charge Sheet to the effect:

"That he remained absent from duty with effect from 18-05-2008 till 30-06-2009 without any leave/permission of the authority" (Copy as Annex "B")

3. That father of appellant became seriously ill and appellant used to attend and look after him as there was no male member in the family for the said purpose. Finally on 20-08-2014, he died and as result, he was removed from service. (Copies as Annex "C" & "D")
4. That thereafter, appellant submitted representation before R. No. 02 on 06-08-2021 for reinstatement in service which was rejected on 22-09-2021. (Copies as Annex "E" & "F")
5. That none of the said orders was ever served upon appellant, so on 14-10-2021, resubmitted application for supply of the copies of the proceedings which were then supplied to him on 20-10-2021. (Copy as Annex "G")

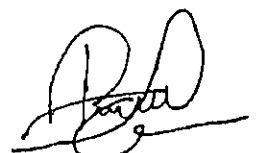
Hence this appeal, inter alia, on the following grounds:

**GROUND S:**

- a. That absence of appellant was not willful but was beyond his control as his father was ill.
- b. That appellant was removed from service from the date of his absence and the said period was treated as leave without pay, meaning thereby that absence period was regularized and cannot be removed from service in such circumstances.
- c. That the impugned order is ab-initio void as the same was given retrospective effect.
- d. That not only the Hon'ble Tribunal but the apex Supreme Court of Pakistan reinstated servants in such like situation by giving retrospective effect to the impugned orders.
- e. That the impugned orders are not per the mandate of law as no proper enquiry was conducted in the matter nor appellant was afforded opportunity of cross examination what to speak of self defense and personal hearing.

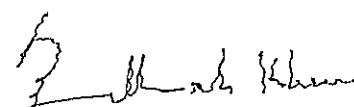
- f. That both the impugned orders are based on malafide.

It is, therefore, most humbly prayed that on acceptance of appeal, order dated 30-06-2009 and 22-09-2021 of the respondents be set aside and appellant be reinstated in service with all consequential / back benefits, with such other relief as may be deemed proper and just in circumstances of the case.



Appellant

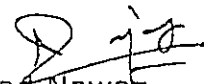
Through



Saadullah Khan Marwat



Arbab Saiful Kamal

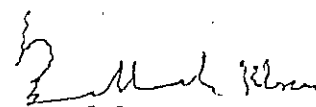


Amjad Nawaz  
Advocates.

Dated. 26-10-2021.

### CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.



Advocate

### AFFIDAVIT

I, Rafiullah khan S/o Badshah Khan R/o Lewan Daradariz, Bannu.Ex-C-No-3880/3032, P. No. 75FRP Hqrs, Peshawar (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief .



DEPONENT



**CTER AND SERVICE ROLL OF**

15-7-87

BULARY NO. ( ) in  
 O ( ) in  
 O ( ) in

DISTRICT  
 DISTRICT  
 DISTRICT

Name

	Father's Name	Tribè or caste	Village or Town	Post and Telegraph Office	Police Station	District	Province	Date of Birth	Height	Chest Measurement	Date of Enrolment	Age on Enrolment	Distinctive Marks
Rafi Ullah Khan	Bad Shah Khan	Muslim Peshawar	Lahore Dardana	Hakim	do	Bannu	NWFP	6-4-1989	5-8	33x35	15-7-07	19-03-09	

Bill No. dated received back and attached to the Fauji Misal.

Service prior to present employment which is approved for pension service: **COMMANDANT**

Department	Rank of Grade	Pay of last Appointment	From	To	Period
	Attested				Years Month Days
		<i>[Signature]</i>			
Order on service.	District Police Officer <b>BANNU</b>		Reference to orders approving above service for pension service in the Police Department.		

I understand that I have been appointed under section 7 of the Police Act (V of 1861) and the purport of that section and the provisions of the Act and now in force by which my discipline and conduct are governed have been explained to me. I agree to serve faithfully under the Act and to obey all lawful orders issued have received a certificate of appointment issued under section 8 of the Police Act (V of 1861).

Impression of fingers and thumb of left hand.

Left ring	Left middle	Left index	Left thumb



C 6  
**Maj Gen. (R)**

**Mohammad Naeem Khan HI(M)**

M.B.B.S. (Pesh), F.C.P.S. (Pak), F.R.C.P. (London), D.C.N. (London)

Former:

Principal Army Medical College

Professor & Head, Department of Medicine, A. M. College

Advisor in Neurology, Pakistan Armed Forces

Member Faculty of Neurology CPS-PAKISTAN

Fellow American Academy of Neurology

Member International Movement Disorder Society

Khan House  
604-A  
Peshawar Road  
Rawalpindi.

: 051 5095579  
: 051 25465171  
: 051 8318986  
: 051 8318987  
: 0333-5145392



Name :

Bedste 1110

Age : 75+

Date :

23 NOV 2012

PD.

- Blood CRP ESO
- Sugar
- LFTs
- Ux-ac
- Cr
- Culbar
- USG - abd -
- KUB
- Prostatic
- DUCU
- Carotid doppler

1. Gov. Seljine 57 ✓  
ایک نائے لہ
2. Gov. PK-Merb 101 ✓  
ایک نائے لہ  
1+1 ✓
3. Gov. Simerat ✓  
1/2 + 1/2 ✓  
1/2 + 1/2 + 1/2 ✓
4. Gov. Raqeeb 257 ✓  
1+1+1
5. Gov. Inderal 44 ✓  
1/2 + 1/2 + 1/2
6. Gov. Matflood ✓  
1+1
7. Gov. Ugin ✓  
1+1

0692  
  
Maj General (R)  
MUHAMMAD NAEEM KHAN HI (M)  
F.C.P.S. (Pak) DCN (UK)  
Consultant Physiatrist & Neurologist

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# KHAN CLINICAL LABORATORY

604-A, Khan House, Peshawar Road, Rawalpindi Cantt. Tel: 5832927, Mob: 0321-5267098

## S. LIPID PROFILE

Name: <b>BADSHA KHAN</b>	Ref. No:	
Age: 75 Years	Sex: M	Date: 23/11/2012
Specimen: S. CHOLESTEROL	Ward/OPD: 22	
Clinician: DR.GEN.(R) MUHAMMAD NAEEM KHAN		

TESTS	RESULTS	NORMAL RANGES
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S. CHOLESTEROL.....	148 mg/dl.	
Recommended Range.	(NCEP Coordinating Committee)	

(Without Known Coronary Artery Disease)  
Less Than OR Equal To 200 mg/dl.      DESIRABLE

(With Known Coronary Artery Disease)  
Less Than OR Equal To 160 mg/dl.      OPTIMAL

S. TRIGLYCERIDES.....	mg/dl.	( 46 - 236 )
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HDL- CHOLESTEROL.....	mg/dl.	
Recommended Range.	(NCEP Coordinating Committee)	

(Without Known Coronary Artery Disease)  
More Than OR Equal To 35 mg/dl.

(With Known Coronary Artery Disease)  
More Than OR Equal To 35 mg/dl.      OPTIMAL

LDL- CHOLESTEROL.....	mg/dl.	
Recommended Range.	(NCEP Coordinating Committee)	

(Without Known Coronary Artery Disease)  
Less Than OR Equal To 130 mg/dl.      DESIRABLE

(With Known Coronary Artery Disease)  
Less Than OR Equal To 100 mg/dl.      OPTIMAL

Col(R) M. Safdar Khan

MBBS (Pb) MCPS (Clinical Pathology)

M. Phil (Histopathology)

CJT Cardiovascular Pathology (UK)

Fellow In Cardiac Pathology (UK)

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# KHAN CLINICAL LABORATORY

604-A, Khan House, Peshawar Road, Rawalpindi Cantt. Tel: 5832927, Mob: 0321-5267098

Department of Chemical Pathology

## RENAL FUNCTIONS TESTS

Name: **BADSHA KHAN**

Ref. No:

Age: 75 Years

Sex: M

Date: 23/11/2012

Specimen: S. CREATININE

Ward/OPD: 22

Clinician: DR.GEN.(R) MUHAMMAD NAEEM KHAN

TESTS	RESULTS	REFERENCE RANGE
Serum UREA		10 - 50 mg/dl 3.3 - 6.7 mmol/l
Serum CREATININE	0.8 mg/dL	0.6 - 1.1 mg/dl 53 - 97 umol/L
Serum SODIUM		136 - 149 mg/dl
Serum POTASSIUM		3.2 - 5.2 mmol/L
Serum CHLORIDE		95 - 105mmol/L
Urinary UREA		20 - 35 g/dl
Urinary CREATININE		95 - 105 mmol/L
Urinary SODIUM		40 - 220 mmol/L
Urinary POTASSIUM		25 - 120 mmol/L
Creatinine Clearance		

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# KHAN CLINICAL LABORATORY

604-A, Khan House, Peshawar Road, Rawalpindi Cantt. Tel: 5832927, Mob: 0321-5267098

Department of Chemical Pathology

## LIVER FUNCTION TESTS

<b>Name:</b> BADSHA KHAN	<b>Ref. No:</b>	
<b>Age:</b> 75 Years	<b>Sex:</b> M	<b>Date:</b> 23/11/2012
<b>Specimen:</b> S. LFT, s	<b>Ward/OPD:</b> 22	
<b>Clinician:</b> DR.GEN.(R) MUHAMMAD NAEEM KHAN		

TESTS	RESULTS	REFERENCE RANGE
Serum BILIRUBIN TOTAL	0.90 mg/dL	< 1.3 mg/dl 3.4 - 17 umol/L
Serum BILIRUBIN DIRECT		Up to 0.25 mg/dl Upto 4.3 umol/L
Serum BILIRIN INDIRECT		
Serum ALAT (GPT)	34	M: < 41 U/L F: < 31 U/L
Serum ASAT (GOT)		F: < 31 U/L F: < 31 U/L
Serum Alkaline Phosphatase	172	M/F 100 - 290 U/L Child: 180 - 615 U/L
Serum total Proteins		66 - 87 g/L
Serum Albumin		38 - 55 g/L
Serum Gamma GT		M: 11 - 61 U/L F: 9 - 39 U/L
A/G Ratio		1.2 - 1.8 Ratio

**Col(R) M. Safdar Khan**  
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Fellow in Cardiac Pathology (UK)

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**KHAN CLINICAL LABORATORY**

604-A, Khan House, Peshawar Road, Rawalpindi Cantt. Tel: 5832927, Mob: 0321-5267098

Department of Haematology

**BLOOD COMPLETE PICTURE**Name: **BADSHA KHAN**

Ref. No:

Age: 75 Years

Sex: M

Date: 23/11/2012


Specimen: BLOOD CP, ESR

Ward/OPD: 22

Clinician: DR.GEN.(R) MUHAMMAD NAEEM KHAN

TESTS	RESULTS	NORMAL VALUES
WBCs	7.9	4.0 - 10.0 X 10 <sup>9</sup> /L
RBCs	4.9	M: 4.5 - 6.5, F: 3.8 - 5.8 x 10 <sup>12</sup>
Haemoglobin	11.1	F:12-14, M:14-16 g/dl
PCV	34	40 - 50 %
MCV	69	76 - 96 %
MCH	22	27 - 31 pg
MCHC	33	32 - 34 g/
Platelets	227	M: 150 - 400 x 10 <sup>9</sup> /L
E.S.R.	6	M:0-10, F:0-20 mm/ 1 hr

DIFFERENTIAL COUNT (%)	NORMAL VALUES	RBCs MORPHOLOGY
Polymorphs	70	40 - 75 %
Lymphocytes	76	20 - 45 %
Monocytes	2	01- 06 %
Eosinophils	2	01- 06 %
Basophils		
Band Form		
Metamyelocytes		
Myelocytes		
Promyelocytes		
Blast		
Nucleated RBC		
Corrected WBC		
		Anisocytosis
		Microcytosis
		Macrocytosis
		Poikilocytosis
		Hypochromia
		Polychromasia
		Spherocytes
		Eliptocytes
		Target Cells
		Cre. RBCs
		Reticulocytes

  
**Col(R) M. Safdar Khan**  
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# KHAN CLINICAL LABORATORY

604-A, Khan House, Peshawar Road, Rawalpindi Cantt. Tel: 5832927, Mob: 0321-5267098

Department of Chemical Pathology

## GLUCOSE PROFILE

Name: BADSHA KHAN

Age: 75 Years

Sex: M

Ref. No:

Date: 23/11/2012

Ward/OPD: 22

Specimen: BLOOD SUGAR(R)

Clinician: DR.GEN.(R) MUHAMMAD NAEEM KHAN

TESTS	RESULTS	REFERENCE RANGE
Serum Glucose FASTING		70 - 110 mg/dl 3.3 - 5.8 mmol/L
Serum Glucose (2 hrs after meal)		76 - 140 mg/dl 3.3 - 7.8 mmol/L
Serum Glucose RANDOM	113.0 mg/dL	< 160 mg/dl < 8.8 mmol/L
Glycosylated Haemoglobin		4.8 - 6.2 %

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Fellow in Cardiac Pathology (UK)

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**KHAN CLINICAL LABORATORY**

604-A, Khan House, Peshawar Road, Rawalpindi Cantt. Tel: 5832927, Mob: 0321-5267098

Department of Haematology

**BLOOD COMPLETE PICTURE**Name: **BADSHA KHAN**

Ref. No:

Age: 75 Years

Sex: M

Date: 23/11/2012

Specimen: BLOOD CP, ESR

Ward/OPD: 22

Clinician: DR.GEN.(R) MUHAMMAD NAEEM KHAN

TESTS	RESULTS	NORMAL VALUES
WBCs	7.9	4.0 - 10.0 X 10 <sup>9</sup> /L
RBCs	4.9	M: 4.5 - 6.5, F: 3.8 - 5.8 x 10 <sup>12</sup>
Haemoglobin	11.1	F:12-14, M:14-16 g/dl
PCV	34	40 - 50 %
MCV	69	76 - 96 %
MCH	22	27 - 31 pg
MCHC	33	32 - 34 g/
Platelets	227	M: 150 - 400 x 10 <sup>9</sup> /L
E.S.R.	6	M:0-10, F:0-20 mm/ 1 hr

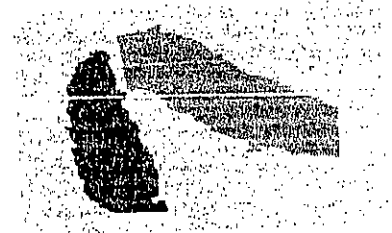
DIFFERENTIAL COUNT (%)	NORMAL VALUES	RBCs MORPHOLOGY
Polymorphs	70	40 - 75 %
Lymphocytes	76	20 - 45 %
Monocytes	2	01- 06 %
Eosinophils	2	01- 06 %
Basophils		
Band Form		
Metamyelocytes		
Myelocytes		
Promyelocytes		
Blast		
Nucleated RBC		
Corrected WBC		
		Reticulocytes

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 Fellow in Cardiac Pathology (UK)

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**KHAN  
ULTRASOUND &  
COLOUR DOPPLER**



Name BADSHAH KHAN Age 75 yrs Date 23-Nov-12

**ULTRASONOGRAPHY ABDOMEN & PELVIS**

- **LIVER:** Liver is normal in size 13.3cm and shows normal echotexture. No mass, cyst or abscess is seen. Parenchymal echogenicity is normal. Portal vein calibre is normal. Bile ducts are not dilated.
- **GALLBLADDER:** contracted (post prandial)
- **SPLEEN:** Normal in size with homogeneous texture.
- **PANCREAS:** No mass, smooth contours and normal texture.
- **RIGHT KIDNEY:** It is normal in size 11.5 cm and texture with smooth contours and shows normal parenchymal echogenicity. No calculus, mass, cyst or hydronephrosis is noted.
- **LEFT KIDNEY:** It is normal in size 9.9 cm and texture with smooth contours and shows normal parenchymal echogenicity. No calculus, mass, cyst or hydronephrosis is noted.
- **URINARY BLADDER:** No calculus or mass seen. Normal wall thickness.
- **PROSTATE:** is normal in size 24 gm. It shows normal echotexture with no focal lesion seen.
- **PREVOID PRIMARY URINE:** 160 ml
- **POSTVOID RESIDUAL URINE:** 4 ml
- **GENERAL ABDOMEN:** No ascites is seen.

**OPINION:**

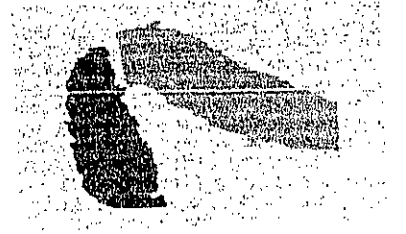
**Normal Study**

Dr. Ahsan Khan

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**KHAN  
ULTRASOUND &  
COLOUR DOPPLER**



Name BADSHAH KHAN Age 75 yrs Date 23-Nov-12

**ULTRASONOGRAPHY ABDOMEN & PELVIS**

- **LIVER:** Liver is normal in size 13.3cm and shows normal echotexture. No mass, cyst or abscess is seen. Parenchymal echogenicity is normal. Portal vein calibre is normal. Bile ducts are not dilated.
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- **GENERAL ABDOMEN:** No ascites is seen.

**OPINION:**

**Normal Study**

*[Handwritten signature]*

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23-11-12

# KHAN CLINICAL LABORATORY

604-A, Khan House, Peshawar Road, Rawalpindi Cantt. Tel: 5832927, Mob: 0321-5267098

## S. LIPID PROFILE

Name: <b>BADSHA KHAN</b>	Ref. No:
Age: 75 Years	Sex: M
Specimen: S. CHOLESTEROL	Date: 23/11/2012
Clinician: DR.GEN.(R) MUHAMMAD NAEEM KHAN	Ward/OPD: 22

TESTS	RESULTS	NORMAL RANGES
S. CHOLESTEROL.....	148 mg/dl.	
Recommended Range.	(NCEP Coordinating Committee)	
(Without Known Coronary Artery Disease)		
Less Than OR Equal To	200 mg/dl.	DESIRABLE
(With Known Coronary Artery Disease)		
Less Than OR Equal To	160 mg/dl.	OPTIMAL
S. TRIGLYCERIDES.....	mg/dl.	( 46 - 236 )
HDL- CHOLESTEROL.....	mg/dl.	
Recommended Range.	(NCEP Coordinating Committee)	
(Without Known Coronary Artery Disease)		
More Than OR Equal To	35 mg/dl.	
(With Known Coronary Artery Disease)		
More Than OR Equal To	35 mg/dl.	OPTIMAL
LDL- CHOLESTEROL.....	mg/dl.	
Recommended Range.	(NCEP Coordinating Committee)	
(Without Known Coronary Artery Disease)		
Less Than OR Equal To	130 mg/dl.	DESIRABLE
(With Known Coronary Artery Disease)		
Less Than OR Equal To	100 mg/dl.	OPTIMAL

Col(R) M. Safdar Khan  
 MBBS (Pb) MCPS (Clinical Pathology)  
 M. Phil (Histopathology)  
 CJT Cardiovascular Pathology (UK)  
 Fellow in Cardiac Pathology (UK)

17

23-11-12



# KHAN ULTRASOUND & COLOUR DOPPLER

Name BADSHAH KHAN Age 75 yrs Date 23-Nov-12

## CAROTID DOPPLER ULTRASONOGRAPHY

### RIGHT:

- The common carotid artery, internal carotid artery and external carotid artery show normal caliber. Small plaque [7x1.9 mm] is seen at the origin of ECA with 38 % diameter stenosis. These vessels show normal flow and peak systolic velocities.
- The Intima-media thickness is increased 1.0 mm.

	CCA	ICA	ECA
PSV (cm/s)	39	29	30
EDV (cm/s)		9	
ICA /CCA	0.7		

### LEFT:

- Mildly echogenic posterior wall plaque [11x1.3 mm] is seen at bifurcation with 32 % diameter stenosis at this level.
- Internal carotid artery and external carotid artery show normal caliber. No plaque is noted in the lumen. These vessels show normal flow and peak systolic velocities.
- The Intima-media thickness is increased 0.9 mm.

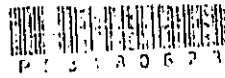
	CCA	ICA	ECA
PSV (cm/s)	35	30	24
EDV (cm/s)		8	
ICA /CCA	0.8		

### CONCLUSION:

Bilateral atherosclerotic changes with plaques causing mild stenosis in RECA and left bifurcation

*[Signature]*  
Dr. Yeshu kumar

18



26-8-14

THE GOVT OF KHYBER PAKHTUNKHWA PAKISTAN

DEATH CERTIFICATE

FORM NO: P03 80628

CRMS No: D111034-14-0028  
NATURE OF DEATH: NORMAL

درخواست دہندہ کا نام: نصیر محمد خان

1110134636745 درخواست دہندہ کا شناختی کارڈ نمبر

پتہ: کورڈر لیوان دروزیر، تحصیل: بٹگرام، ضلع: بٹگرام

تاریخ وفات	تاریخ پیدائش	والد کا نام	مستوفی کا نام
20-6-2014	20-6-2014	شہنشاہ کورڈر	شہنشاہ کورڈر
جنس	بیماری کی وجہ سے وفات	مب	بظاہر
مرد	لیوان دروزیر	مب	خان
		25-1-2005	1110128797707

APPLICANT NAME: NASIR MUHAMMAD KHAN  
 APPLICANT CNIC: 1110134636745 RELATION WITH DECEASED: Father  
 ADDRESS: VILLAGE: LEWAN DARDARIZ.  
 TEHSIL: BANNU, DISTRICT: BANNU

DECEASED NAME/ CNIC	FATHER NAME/ CNIC	DATE OF BIRTH	SEX	RELIGION	PLACE/DATE OF DEATH	DATE OF BURIAL	REASON OF DEATH	SICKNESS PERIOD
BADSHAH KHAN 1110128797707	MUHEB ULLAH KHAN	25-1-2005	MALE	ISLAM	LEWAN DARDARIZ 20-6-2014	20-6-2014	NATURAL	

✓ BLOOD RELATION PERSON CAUSING DISPOSAL OF BODY  
 NAME: NASIR MUHAMMAD KHAN  
 CNIC: 1110134636745  
 GRAVEYARD NAME: LEWAN DARDARIZ  
 ENTRY DATE: 29-8-2014  
 ISSUE DATE: 29-8-2014  
 ADDITIONAL INFORMATION:

نام: نصیر محمد خان  
 شناختی کارڈ نمبر: 1110134636745  
 قبرستان کا نام: لیوان دروزیر  
 تاریخ انٹرن: 29-8-2014  
 اتالیقی سٹیبل: 29-8-2014

*(Signature)*  
 ڈسٹرکٹ ایجنٹ

تعمیراتی سیکشن (34) بٹگرام

D 19 30-6-09

**O.R.D.E.R**

This Office Order relates to the disposal of formal departmental proceedings against Constable Rafi Ullah, No.3032, of FRP/HQrs Peshawar, who remained absent from duty w.e.from 01-12-2008 till-to date without taking any leave/permission of the competent authority.

In this connection he was issued charge sheet and summary of allegations and RI/FRP/HQrs was nominated as Enquiry Officer. The Enquiry Officer after fulfilling all codal formalities submitted his findings. Wherein he recommended to take ex-parte action against him. Upon the findings of Enquiry Officer he was issued Final Show Cause Notice which he received but failed to submit his reply in the prescribed period of (14) days.

Keeping in view the recommendation of the Enquiry Officer and other material available on record it has become crystal clear that the delinquent official is habitual absentee and always remained absent from duty on one pretext or the other. Therefore, in exercise of Powers vested to me under the NWFP, Removal from Service (Spl. Power) Ordinance 2000, Constable Rafi Ullah, No.3032, of FRP/HQrs Peshawar, is hereby **Removed from Service** from date of his absence. His absence period is treated as Leave without pay.

**Order Announced.**

*Awal k*

(AWAL KHAN)  
Dy: Commandant,  
Frontier Reserve Police,  
NWFP, Peshawar.

No. 1073-76/PA/FRP/HQrs: dated Peshawar, the 30/06/2009.

Copy of the above is forwarded to:-

1. The OSI/ FRP/HQrs: Peshawar.
2. The Accountant /FRP/HQrs: Peshawar.
3. The SRC/FRP/HQrs: Peshawar
4. The FMC/ FRP/HQrs: Peshawar with original Enquiry file.

**FRP. HQ**

O.B. No. 720

Date 31/07/09

\*\*\*\*\*



خدمت جناب کمانڈنٹ صاحب FRP صوبہ خیبر پختونخوا پشاور

درخواست دربارہ بحال کے جانے سائل کنٹریبل رفیع اللہ

سابقہ نمبر 3880 پشاور، موجودہ نمبر 3032 از

فرم 12 اے دستور - 1073-76/PA - OBS 920

01-07-2009 30-06-2009

Office of the Andl ICDI cum  
F.R.P. Pk. Peshawar  
Diary No. 5152  
Dj. 11-8

جناب عالی! سائل کنٹریبل رفیع اللہ ذیل طرفین رساں ہے

1. یہ کہ سائل محکمہ پولیس FRP میں از تاریخ بھرتی تا 17/05/2005 ریگولر حاضری کی اور ڈیوٹی سرانجام دی ہے۔ جو کہ میرے ریکارڈ سے ظاہر ہے۔

2. یہ کہ سائل بوجہ والد صاحب کی بیماری کے غیر حاضر رہا۔ جو کہ 2006ء کو سخت بیماری کے بعد فوت ہوا۔ اور سائل بوجہ گھر میں والد کے بعد بڑا ہونے کی وجہ سے دن رات والد کی خدمت میں مصروف رہا۔ نیز سائل کا والد بھی محکمہ پولیس میں بطور ASD ڈیوٹی سرانجام دے چکا ہے۔

3. یہ کہ والد صاحب کی وفات کے بعد فن سائل کی والدہ شدید بیمار ہوئی جس کے ساتھ تا حال اس کے علاج معالجے میں مصروف رہا ہوں۔

4. یہ کہ سائل شدید مجبور یوں کی وجہ سے اپنی ملازمت پر حاضری نہیں دے سکا ہے۔ اور ملازمت کے فرائض سرانجام دہی سے

محروم رہا۔

5. یہ کہ اب سائل مزید اپنے ملازمت کے فرائض سرانجام دینے کا شدید خواہشمند ہے۔ تاکہ ملازمت کے ذریعے ملک و قوم کی خدمت کر سکے۔

لہذا استدعا ہے کہ سائل رفیع اللہ کنٹریبل رفیع اللہ کو بحال بحال کر کے سائل کو ملازمت کا موقع فراہم کیا جاوے۔

سائل عمر کھر دعا گو رہے گا۔

مورخہ 08/06/2021

رفیع اللہ ولد عابد شاہ خان (سائل)

DA

کنہ لیوان در ڈریز تھانہ ہوید

Mob # 0333-9564976

CN9C# 11101-6584874-7

21  
22-9-23

ORDER

This order will dispose of the departmental appeal preferred by ex-constable Rafi Ullah No. 3880 of FRP HQrs; against the order of competent authority, wherein he was awarded major punishment of removal from service on 30.06.2009.

Brief facts of the case are that the delinquent ex-constable was enlisted in police department on 15.07.2007. The applicant was proceeded against on the allegation that he remained absent from duty with effect from 01.12.2008 till the date of his removal from service i.e 30.06.2009 for total period of 06 months without any leave or prior permission of the competent authority.

In this regard proper departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Summary of Allegations and RI FRP HQrs; Peshawar was nominated as Enquiry Officer to conduct proper enquiry against him. The Enquiry Officer submitted his findings, wherein he recommended him for ex-party action.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, to which he received, but he failed to submit his reply.

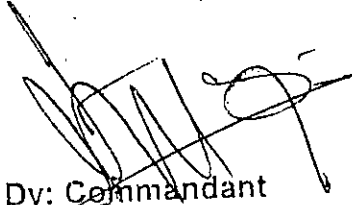
Keeping in view the recommendation of the Enquiry officer and other material available on record, he was removed from service vide Order Endst; No. 1073-76/PA, dated 30.06.2009.

Feeling aggrieved against the impugned order, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 16.09.2021.

During the course of personal hearing, the applicant failed to present any justification regarding his prolong absence. From perusal of relevant record, it has been found that the instant appeal is found badly time barred about more than 10 years. It is settled proposition of law that law helps the diligent and not indolent. The one, who wish to enforce his claim, must do it at the earliest a lacks deprive the litigant from enforcing his right. 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, and exercise of power, delegated to the undersigned vide office order No. 341-45/PA, dated 13.03.2019, finds no substance in the appeal, therefore, the same is rejected and filed being meritless and badly time barred:

Order Announced.

  
o/c Dy: Commandant  
For Commandant FRP  
Khyber Pakhtunkhwa, Peshawar.

No 7614-16 ISI Legal, dated Peshawar the 22 / 19 / 2021.

Copy of above is forwarded for information and necessary action to

the:-

1. Accountant FRP HQrs; Peshawar.
2. OASI FRP HQrs; Peshawar.
3. SRC FRP HQrs; Peshawar. His Service roll sent herewith.

خدمت جناب قائد نامہ صاحب الف آری بیٹا اور

درخواست عمر ادعا سنگی لفورٹ

جناب عالی!

1) یہ سہ سائل 2007 کو الف آری بیڈ کو اسٹریٹ میں بطور اسٹیشن مقرر ہوا۔

2) یہ سہ سائل گرینڈ چالانٹ کی وجہ سے ڈیوٹی سے غیر حاضر ہوا جسکی بناء پر لوٹری سے سیر طرف کر دیا گیا۔

3) یہ سہ سائل کو دیل لفورٹ درکار ہیں۔

(ا) حاج شیخ و شوکا زلفونس

(ب) الٹو اسٹریٹ رپورٹ

(ج) ڈی سیل آرڈر / سیر طرفی آرڈر

وٹیز وٹیز

فٹنڈ اسٹند عمارت بجائی کے سائل

کو مندرجہ بالا لفورٹ ڈیک احکامات صادر فرمائیں۔

الف آری

المترقوم: 14/10/21

رفیقہ ایڈیٹر ولد ماد شاہ خان

پتہ: لاہور، چیمبرس سٹریٹ، نمبر ۵۵

مستجاب ایڈوکیٹ

زعینح اللہ خان منام

دعویٰ

پاکستان کے صدر ایجنسی

③

③

مبتدیہ سندھ و عمران بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آلہ مقام لاہور  
 کیسٹم اسٹیشن اٹالس خان صورت سے ایڈوکیٹ، ہائی کورٹ کو وکیل مقرر کر کے ایڈوکیٹ کیا جاتا ہے کہ صاحب  
 عدالت کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے کے لئے ہائی کورٹ و آفیشلٹ، وکیل صاحب  
 نے جواب دہی اور اقبال دعویٰ اور لٹریچر ڈگری کرنے کے لئے اجراء اور وصولی چیک زر پیس اور مرضی دعویٰ اور درخواست  
 ہر قسم کی تعلیق انہوں نے یہ شرط کر کے کہ اختیار ہوگا نیز لٹریچر عدم پیروی یا ڈگری کیلئے یا اپنی کی برآمدگی  
 اور وصولی نیز دائر کرنے کے لئے اپنی کاروائی و پیروی کرنے کا اختیار ہوگا اور لٹریچر ضرورت مقدمہ نہ کرے  
 کے لئے یا پیروی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے لٹریچر کا اختیار ہوگا  
 اور وہ اپنے مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواضح منقولہ  
 قبول ہوگا اور دوران مقدمہ میں جو فریب و توجہ و توجہ و توجہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب  
 کو وصول ہوں گے نیز لٹریچر و فریب کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاخیر پیشی مقام روزہ  
 پر ہو یا عدالت باہر ہو تو وکیل صاحب یا جہانہ ہوں گے کہ پیروی مذکور کریں۔  
 لہذا رکالت نامہ رکھ دیا کہ سند ہے۔

المرقوم

التجدد

التجدد

التجدد

ارباب ایڈوکیٹ  
 ایڈوکیٹ

سید اللہ عثمان فروری  
 ایڈوکیٹ

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