

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.

Service Appeal No. 905/2018

Date of Institution ... 10.07.2018

Date of Decision ... 07.12.2021

Dr. Ali Gohar S/O Badshah Khan, R/O Sab Zai Apartment First Floor Warsak Road Peshawar.

... (Appellant)

VERSUS

Chief Secretary of Government of Khyber Pakhtunkhwa Peshawar and two others.

... (Respondents)

MR. NAVEED KARIM KHALIL,
Advocate

--- For appellant.

MR. NOOR ZAMAN KHATTAK,
District Attorney


--- For respondents.

MR. AHMAD SULTAN TAREEN
MR. SALAH-UD-DIN

--- CHAIRMAN
--- MEMBER (JUDICIAL)

JUDGMENT:

SALAH-UD-DIN, MEMBER:-


Precise facts forming the background of the instant service appeal are that the appellant while serving as Medical Officer in DHQ Hospital Mardan was proceeded against on the ground of his willful absence from duty. On conclusion of the inquiry, the appellant was removed from service vide order dated 10.07.2014, which was challenged by the appellant through filing of departmental appeal on 19.01.2016, which as per the averment of the appellant was not responded, therefore, the appellant submitted reminder to the appellate

Authority in the month of April 2018, which was also not responded, hence the instant service appeal.


2. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions made by the appellant in his appeal.

3. Learned counsel for the appellant has contended that vide application dated 17.07.2009, the appellant had requested for grant of five years leave with effect from 01.08.2009, however the respondents conducted the inquiry proceedings at the back of the appellant and have wrongly and illegally removed him from service; that no show-cause notice was issued to the appellant and the procedure as provided in Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 was not complied with; that the appellant was not provided any opportunity of self defense or personal hearing and he has been treated by the respondents with discrimination; that the impugned order being wrong and illegal is liable to be set-aside and the appellant is entitled to be reinstated in service with all back benefits.

4. On the other hand, learned District Attorney for the respondents has contended that the appellant was not at all interested in the performing of his duty and was in the habit of remaining absent without any sanctioned leave; that the appellant remained absent from duty with effect from 01.08.2009, therefore, show-cause notice was issued to him through registered A.D on his temporary as well as permanent home address but he did not bother to attend his duty; that show-cause notice was then issued to the appellant through publication in two leading newspapers, however the appellant did not turn up for his duty, therefore, he was removed from service after compliance of all legal and codal formalities; that the application for leave allegedly submitted by the appellant has not at all been received by the competent Authority and he remained absent for considerable long period without

seeking any leave/permission of the competent Authority; that the order of removal of the appellant from service has been duly sent to the appellant on his home address vide endorsement dated 13.08.2014 and his departmental appeal was also dismissed vide order dated 06.07.2015; that the appellant has wrongly alleged in his appeal that his departmental appeal was not responded; that the departmental as well as service appeal of the appellant are badly time barred, therefore, the appeal in hand is liable to be dismissed on this score alone.

5. We have heard the arguments of learned counsel for the appellant as well as learned District Attorney for the respondents and have perused the record.


6. A perusal of the record would show that on account of his absence from duty with effect from 01.08.2009, disciplinary action was initiated against the appellant and notice was issued to him through registered acknowledgment on his temporary as well as permanent home address, however the appellant did not turn up for his duty. Notice was then issued to the appellant through publication in two leading newspapers to join his duty, failing which ex-parte action would be taken against him but even then the appellant did not bother to attend his duty, therefore, ex-parte decision as required under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 was taken and the appellant was removed from service vide order dated 10.07.2014, copy of which was sent to the appellant vide endorsement dated 13.08.2014. In view of material available on the record, it is crystal clear that the impugned order was passed by the competent Authority after complying the required procedure provided in Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. The appellant has remained absent from duty for years without any leave or permission of the competent Authority.

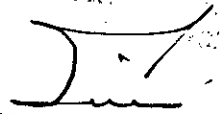
The appellant has been unable to show any justified legal reason for his absence from duty for such long period.

7. The appellant has alleged that his departmental appeal was not responded by the appellate Authority, however annexed with the comments of the respondents is copy of order dated 16.06.2015, which would show that the departmental appeal/representation of the appellant against the impugned order was regretted and copy of the same was also sent to the appellant. Furthermore, the appellant has though alleged that he had submitted an application on 17.07.2009 for grant of five years leave with effect from 01.08.2009, however the submission of such application has been categorically denied by the respondents in their comments. The appellant has not been able to substantiate his aforementioned plea through production of any diary number or endorsement of any officer/official of the concerned department.

8. In view of the above discussion, the appeal in hand being devoid of merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
07.12.2021


(AHMAD SULTAN TAREEN)
CHAIRMAN


(SALAH-UD-DIN)
MEMBER (JUDICIAL)


Service Appeal No. 905/2018

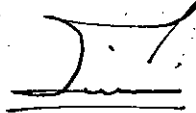
ORDER
07.12.2021

Mr. Naveed Karim Khalil, Advocate, for the appellant present. Mr. Jaffar Ali, Assistant alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand being devoid of merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
07.12.2021


(Ahmad Sultan Tareen)
Chairman


(Salah-Ud-Din)
Member (J)

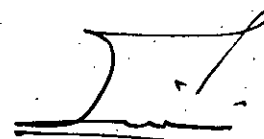
03.06.2021

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

Arguments could not be heard due to paucity of court time. Adjourned. To come up for arguments before the D.B on 03.09.2021.



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

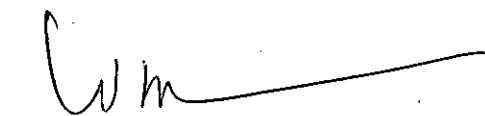


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

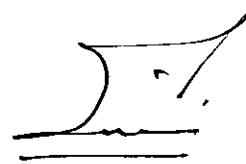
03.09.2021

Clerk of learned counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments before the D.B on 07.12.2021.



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

04.12.2020

Junior to counsel for the appellant present.

Zara Tajwar, learned Deputy District Attorney present.

Former requests for adjournment as senior counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar.

Adjourned to 02.03.2021 for arguments before D.B.



(Atiq ur Rehman Wazir)
Member (E)

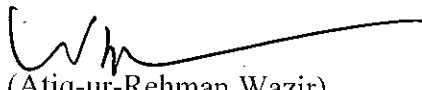


(Rozina Rehman)
Member (J)

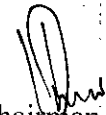
02.03.2021

Junior to counsel for the appellant and Addl. AG alongwith Asad Sohail, Assistant for the respondents present.

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, the matter is adjourned to 3.06.2021 for hearing before the D.B.



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

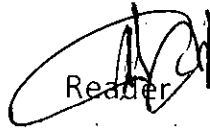


Chairman

18-5.2020

Due to COVID19, the case is adjourned to

10/8/2020 for the same as before.


Reader

10.08.2020

Due to summer vacations case to come up for the same on
12.10.2020 before D.B.

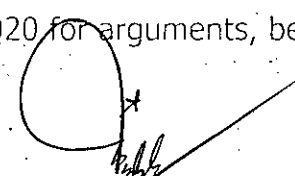

Reader


12.10.2020

Nemo for appellant.

Mr. Kabir Ullah Khattak learned Additional Advocate General
alongwith Dr. Salim Javid Litigation Officer for respondents
present.

Preceding two dates were adjourned on a Reader's note,
therefore, notice be issued to appellant and his counsel for
04.12.2020 for arguments, before D.B.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

04.12.2019

Appellant with counsel present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 03.02.2020 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

03.02.2020

Learned counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 17.03.2020 before D.B.


Member


Member

17.03.2020

None for the appellant present. Addl: AG for respondents present. Due to general strike on the call of Peshawar Bar Council, the instant case is adjourned. To come up for arguments on 18.05.2020 before D.B.


(MAIN MUHAMMAD)
MEMBER


(M.AMIN KHAN KUNDI)
MEMBER

15.07.2019

Junior counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned to 12.09.2019 for arguments before D.B.



(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

12.09.2019

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned to 28.10.2019 for arguments before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

28.10.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Jaffar Shah, Assistant for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 04.12.2019 for arguments before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

11.1.2019

Counsel for the appellant and Addl. AG alongwith Hazrat Shah, Superintendent and Jafar Shah, Assistant for the respondents present.

Parawise comments on behalf of the respondents have been submitted. To come up for hearing before the D.B. on 01.04.2019. The appellant may furnish rejoinder within a fortnight, if so advised.

Chairman



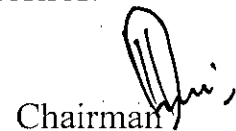
01.04.2019

Appellant in person present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present.

Appellant requests for adjournment as his learned counsel is appearing today before the Apex Court. Adjourned to 20.05.2019 before D.B. The Appellant may submit rejoinder within a fortnight, if so desires.



Member



Chairman

20.05.2019

Appellant in person and Mr. Kabirullah Khattak learned Addl: AG for the respondents present.

Appellant requests for adjournment as his learned counsel is engaged before the Hon'ble High Court in many cases today.

Adjourned to 15.07.2019 for argument before D.B.



Member



Chairman

16.10.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that on the basis of disciplinary proceedings major penalty of removal from service was imposed on him vide impugned order dated 10.07.2014. The main charge leveled against the appellant was not joining duty after expiry of sanctioned leave. He preferred departmental appeal on 19.01.2016 which was not decided within the stipulated period, hence, the instant service appeal. Enquiry proceedings were not conducted in the accordance with the spirit of the invogue rules and as such he was condemned unheard.

Points urged need consideration. Admit, subject to limitation. The appellant is directed to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 29.11.2018 before S.B.

Appellant Deposited
Security & Process Fee

(AHMAD HASSAN)
MEMBER

29.11.2018

Appellant with counsel and Mr. Kabirullah Khattak learned Additional Advocate General present. Written reply not received. Mr. Jaffar Ali Assistant representative of the respondents absent. Adjourn. To come up for written reply/comments on 11.01.2019 before S.B.

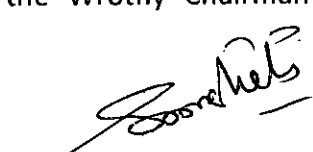

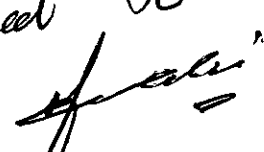
Member

Form -A

FORM OF ORDER SHEET

Court of _____

Case No. 905/2018


S.No.	Date of Order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	17/07/2018 18-7-2018	The appeal of Mr. Ali Gohar resubmitted today by Mr. Muhammad Rafique Mohmand Advocate may be entered in the Institution register and put up to the Wrothy Chairman for proper order please.  REGISTRAR The case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21-8-2018</u>  CHAIRMAN 20.08.2018 Due to Eidul Azha vocation the case is adjourned to 16/10/2018.  <u>READER.</u>

The appeal of Dr. Ali Gohar son of Badshah Khan r/o Sab Zai Apartment First Floor Warsak Road Peshawar received today i.e. on 10.07.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Page Nos. 11 to 15 and 17 of the appeal are illegible which may be replaced by legible/better one.
- 2- Memorandum of appeal may be got signed by the appellant.
- 3- One more copy/set of the memo of appeal along with annexures i.e. complete in respect may also be submitted with the appeal.

No. 1383 /S.T,

Dt. 11/07 /2018.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Rafiq Mohmand Adv. Pesh.

*Sis, as per dissection, deficiencies/needs
removed and resubmitted.*



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

Service Appeal No. 905 /2018

Dr. Ali Gohar **Appellant**

VERSUS

Chief Secretary & others..... **Respondents**

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Copy of Service Appeal		1-7
2.	Affidavit		8
3.	Addresses of Parties		9
4.	Copy of Appointment letter	A	10-14
5.	Transfer Order to KTH dated 06-06-1998	B	15
6.	Application of Leave and its sanctioned	C	16-17
7.	Extension of Leave application	D	18
8.	Transfer to DHQ Hospital Mardan	E	19-21
9.	Application for Leave of five years	F	22
10.	Extension of Leave application	G	23
11.	Termination notification	H	24-25
12.	Departmental Appeal	I	26-27
13.	Medical report	J	28-31
14.	Reminder Request	K	32
15.	Wakalatnama	L	33

Through **Appellant**

Muhammad Rafique Mohmand

**Naveed Karim Khalil
Wali Ullah**
Advocates, Peshawar

Date: 10.07.2018

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Appeal No. 905 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1141

Dated 10-7-2018

Dr. Ali Gohar S/O Badshah Khan R/O Sab Zai
Apartment First Floor Warsak Road Peshawar.

Appellant

VERSUS

1. Chief Secretary of Government of KP
Peshawar.
2. Secretary Health Department Government of
KP Peshawar.
3. Director General Health Department
Government of KP Khyber Road Peshawar .

.....Respondents

**APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST
ORDER/ NOTIFICATION NO. SOE(H-
II/10-25/2014 DATED 10.07.2014
WHEREBY THE APPELLANT WAS
REMOVED FORM SERVICE WITHOUT
FULFILLING ALL THE CODAL /
LEGAL FORMALITIES.**

Filed to-day

[Signature]
Registrar

10/7/18

Re-submitted to -day
and filed.

[Signature]
Registrar

10/7/18

Prayer In Appeal:-

On acceptance of this appeal, the impugned order/
notification dated 10.07.2014 may be set aside being
illegal unlawful and issued without observing the
required legal formalities and the appellant may
pleased be reinstate in service with all back benefits.

Respectfully Sheweth:-

Brief facts to the instant appeal are as under: -

1. That the appellant being qualified and eligible was initially appointed as medical officer on 03.04.1992. Accordingly he took charge on 22.04.1992 at BHU Janda Distt: Swabi. (Copy of Appointment^{order} is attached as Annex "A").
2. That the appellant served the department with great zeal and to the entire satisfaction of his seniors.
3. That the appellant was transferred to KTH Pesahwar vide order endorsement No. 15928-36/E-I on dated 06.06.1998. (Copy of Transfer Order is attached as Annex "B")
4. That the appellant served the department and his performance remained up to the mark during the entire service career.
5. That the appellant applied for leave without pay for six hundred ~~sixty~~ (600) days which was duly sanctioned by the authority. (Copy of the application is attached as Annex "C").

6. That the appellant after availing the sanctioned leave mentioned above applied extension of leave for 130 days which was also accordingly allowed on 30.01.2007.(copy attached as Annex "D").
7. That at the completion of mentioned leave the appellant submitted joining report to Health Department.
8. That appellant was transferred to District Shangla on 20.10.2008 and then transfer to DHQ hospital Mardan on 04.06.2009 and remained there as MO (Medical Officer) till 30.07.2009.(Copy of Transfer Order is attached as Annex "E").
9. That the appellant applied for extra ordinary leave without pay for 05 years through an application and the application so submitted was entertained by department. (Copy of Application is attached as Annex "F").
10. That at the completion of the above mentioned leave the appellant requested for extension of one and half years through an application dated 18.07.2009.(copy of the application is attached as Annex "G").

11. That after availing extended leave the appellant intended to submit his joining report where he was informed that the services of the appellant was terminated vide notification dated 10.07.2014 (copy is attached as Annex "H").
12. That the appellant approached to the respondents, time in again and tried to persuade them about the situation but respondent repeatedly told the appellant that the request of the appellant is under consideration and at last in the month of January 2016, the appellant was denied to except his joining report.
13. That the appellant then submitted the departmental appeal on dated 19.1.2016 which is still pending with respondents without any response. (Copy attached as Annex "I").
14. That during the pendency of departmental appeal the appellant seriously fall ill and remained on bed due to sickness. (copy attached as Annex "J").
15. That during his illness period there was no one in family to pursue the pending departmental appeal.
16. That appellant in the month of April 2018, submitted a reminder regarding the departmental

appeal to the respondents, the reply of which is still aviated.(copy is attached as Annex "K").

17. That the appellant having no alternate remedy approaches this Hon'ble Tribunal with following amongst other grounds.

GROUND S:-

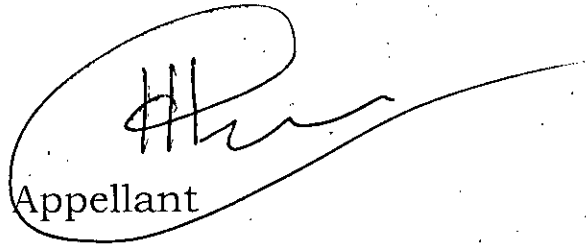
- A. That the acts of respondents is illegal, unjustified without lawful authority, hence not tenable.
- B. That the petitioner has not been treated in accordance with law, rules and regulation.
- C. That the appellant termination order has been passed in sheer violation of law, rules and procedure on subject.
- D. That no show cause notice has been served upon the appellant and the address mentioned in the termination order is incorrect and erroneously been mentioned. It is to submit further that the appellant was never remained on the same address.
- E. That no inquiry as required under law has been conducted and no opportunity of personal hearing has been provided to appellant and thus condemned unheard. So the termination order all together illegal without lawful authority and in

violation of law and rules hence need to be struck down

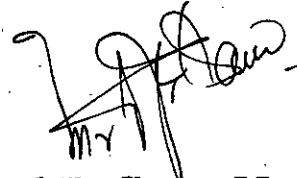
- F. That the appellant has put more than 20 years service and thus has created a legitimate expediency in his favour.
- G. That the mandatory provision of law and rules has badly been violated by the respondents and the appellants has not been treated according to law.
- H. That appellant has thus not admitted any misconduct and imposing major penalty is very harsh unjust and needs to be reviewed.
- I. That the absence of appellant cannot be termed as willful or deliberate, rather he avail the leave according to the sanctioned duly made by the authority.
- J. That appellant reserved the right to agitate any other grounds at the time of arguments.

It is therefore most humbly prayed that on acceptance of this appeal, the impugned termination order may be set aside and the appellant may pleased be reinstate in service with all back benefits.

Any other relief which this honorable tribunal deem proper and appropriate in the circumstances, and has not been specifically asked for may very graciously be granted, in favor of the appellant and against the respondents.


Appellant


Through


Mr

Muhammad Rafique Mohmand


Naveed Karim Khalil

Wali Ullah

Advocates, Peshawar 

Date: 10.07.2018

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

Service Appeal No. _____/2018

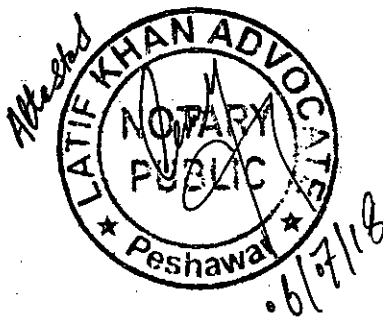
Dr. Ali Gohar **Appellant**

VERSUS

Chief Secretary & others..... **Respondents**

A F F I D A V I T

I, Dr. Ali Gohar S/o Badshah Khan R/O Sab Zai Apartment First Floor Warsak Road Peshawar., do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



[Signature]
DEPONENT

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

Service Appeal No. _____/2018

Dr. Ali Gohar **Appellant**

VERSUS

Chief Secretary & others..... **Respondents**

ADDRESSES OF PARTIES

APPELLANT

Dr. Ali Gohar S/o Badshah Khan R/o Sab Zai
Apartment first flour Warsak Road
Peshawar.

RESPONDENTS

1. Chief Secretary of Government of KP Civil Secretariat Peshawar
2. Secretary Health Department Government of KP Civil Secretariat Peshawar
3. Director General Health Department Government of KP Khyber Road Peshawar.

4.

Appellant

Through

Muhammad Rafique Mohmand

Naveed Karim Khalil

Wali Ullah

Advocates, Peshawar

Date: 10.07.2018

Amman - A/2

(10)

No. *1680* /E.I, Dated Peshawar the *19/1/1992*.

From:

The Director Health Services,
N.W.F. Province, Peshawar.

To

Badshah Khan.
Dr. Ali Gohar Khan S/O ~~Badshah Khan~~,
Malakand Road Takh-ti-Bahi Distt: Mardah.

Subject:- MEDICAL BOARD OF MEDICAL OFFICERS (B-17).

Memo:

ATTESTED

As recommended by the NWFP Public Service Commission, your name is under consideration for appointment as Medical Officer (B-17) in the Health Department on Regular basis subject to your Medical Fitness.

Please appear before the Medical Board on 21st & 22nd Jan: 1992. at 9.00 AM in the Office of the (Civil Surgeon, Peshawar) Medical Superintendent Civil Hospitals, Peshawar in order to complete the pre-requisite.

[Signature]
18/1/92
For Director Health Services,
N.W.F. Province, Peshawar.

No. /E.I,

Copy forwarded to Medical Supdt: Civil Hospitals, Peshawar for information and n/adtsn. He is requested to forward forward the proceedings of the Medical Board to this Directorate (in triplicate).

[Signature]
18/1/92
For Director Health Services,
N.W.F. Province, Peshawar.

No. /E.I,

Copy forwarded to the Secretary to Govt: of NWFP, Health & S. Welfare Department, Peshawar for information.

[Signature]
18/1/92
For Director Health Services,
N.W.F. Province, Peshawar.

(Armen - A)

11

HEALTH DIRECTORATE of N.W.F.P. PESHAWAR.

NOTIFICATION

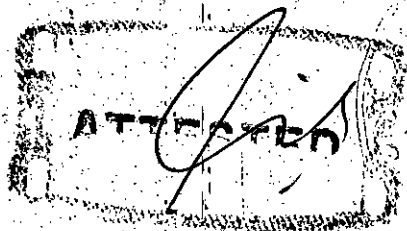
NO. /S.I.
DATED: 16-6-92

In consultation with the N.W.F.P. Public Service Commission Peshawar
DR. Ali Gohar Khan has been appointed as Medical Officer
on Regular basis @ Rs: 2870/- P.M: in Basic Pay Scale No. 17 (i.e) 2870.-215 - 5450
plus usual allowances as admissible by the Govt: from time to time.

DR. Ali Gohar Khan on his first appointment has been
Posted as Medical Officer (BPS 17) at the BHU Janda Distt, Swabi
with effect from 3-8-92 (FN) against the vacant post.

for DIRECTOR HEALTH SERVICES
N.W.F.P. PROVINCE, PESHAWAR

The Manager,
Govt: Printing Press, NWFP, Peshawar
for publication in the Govt: Gazette.



No. 10928-32 E-I,

- Copy forwarded to the:-
Secretary to Govt: of NWFP. Health & S.Welfare Department Peshawar for
information.
- District Health Officer Swabi.
for information and necessary action w/r to his letter
No. _____ dated _____

REGISTERED

- District Accounts Officer, Swabi for information. A copy of
the Health and Age Certificate in respect of the above named Doctor is sent
herewith for record in his office.
A.E-IV, Health Directorate NWFP Peshawar for information.
Divisional Director Health services Peshawar. for information.

for DIRECTOR HEALTH SERVICES,
N.W.F.P. PROVINCE, PESHAWAR.

16/6/92

HEALTH DIRECTORATE OF NWFP PESHAWAR

NOTIFICATION

No. _____

Dated: 16-06-92

In consultation with NWFP Public Service Commission Peshawar Dr. Ali Gohar Khan has appointed as Medical Officer on Regular basis @ 2870/- PM in Basic Pay Scale No.17 (i.e.) 2870 – 215 – 5450 plus usual allowances as admissible by the Govt from time to time.

Dr. Ali Gohar Khan on the first appointment has been posted as Medical Officer (BPS-17) at the BHU Janda District Swabi with effect from 03-04-92(FN) against the vacant post.

for DIRECTORATE HEALTH SERVICES
NWFP, PROVINCE PESHAWAR

The Manager,
Public Printing Press, NWFP, Peshawar
For publication in the Govt: Gazette

S.NO. 10928-32 E-I

Copy forwarded to the:-

1. Secretary to Govt: of NWFP Health & S. Welfare Department Peshawar for information.
2. Directorate Health Officer Swabi.

For information and necessary action w/r to his letter

No. _____ Dated _____

REGISTERED

3. District Accounts Officer, Swabi for information. A copy of the health and age certificate in respect of the above name Doctor is sent herewith for record in his office.

A.E-IV, Health Directorate NWFP Peshawar for information

Divisional Director Health Service Peshawar for information.

for DIRECTORATE HEALTH SERVICES
NWFP, PROVINCE PESHAWAR

112

HEALTH DIRECTORATE OF N.W.F.P. PESHAWAR.

NOTIFICATION

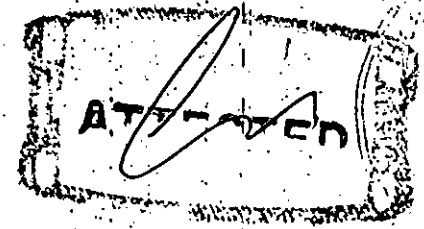
NO. _____
DATED: 16-6-92

In consultation with the N.W.F.P. Public Service Commission Peshawar Dr. Ali Gohar Khan has been appointed as Medical Officer on Regular basis @ Rs: 2870/- P.M. in Basic Pay Scale No: 17 (i.e) 2870 - 215 - 5450 plus usual allowances as admissible by the Govt: from time to time.

Dr. Ali Gohar Khan on his first appointment has been posted as Medical Officer (BPS 17) at the BHU Janda District Swabi with effect from 3.4.92 (FN) against the vacant post.

for DIRECTOR HEALTH SERVICES
N.W.F.P. PROVINCE, PESHAWAR.

The Manager,
Govt: Printing Press, NWFP, Peshawar
for publication in the Govt: Gazette.



1197
24-6-92

No: 10928-32 E-I,

- 1. Copy forwarded to the:-
Secretary to Govt: of NWFP. Health & S.Welfare Department Peshawar for information.
- 2. District Health Officer Swabi.
for information and necessary action w/r to his letter
No. _____ dated _____

REGISTERED

- 3. District Accounts Officer, Swabi for information. A copy of the Health and Age Certificate in respect of the above named Doctor is sent herewith for record in his office.
A.E.-IV, Health Directorate NWFP Peshawar for information.
Divisional Director Health services Peshawar, _____ for information.

Handwritten initials and date: 23/6/92

for DIRECTOR HEALTH SERVICES,
N.W.F.P. PROVINCE, PESHAWAR.

Handwritten signature and date: 17/6/92

Vertical handwritten notes on the left margin: "Handwritten notes on the left margin, possibly including dates and initials." (Note: The text is mostly illegible due to the quality of the scan.)

HEALTH DIRECTORATE OF NWFP PESHAWAR

NOTIFICATION

No. _____

Dated: 16-06-92

In consultation with NWFP Public Service Commission Peshawar Dr. Ali Gohar Khan has appointed as Medical Officer on Regular basis @ 2870/- PM in Basic Pay Scale No.17 (i.e.) 2870 – 215 – 5450 plus usual allowances as admissible by the Govt from time to time.

Dr. Ali Gohar Khan on the first appointment has been posted as Medical Officer (BPS-17) at the BHU Janda District Swabi with effect from 03-04-92(FN) against the vacant post.

for DIRECTORATE HEALTH SERVICES
NWFP, PROVINCE PESHAWAR

The Manager,
Public Printing Press, NWFP, Peshawar
For publication in the Govt: Gazette

S.NO. 10928-32 E-I

Copy forwarded to the:-

1. Secretary to Govt: of NWFP Health & S. Welfare Department Peshawar for information.
2. Directorate Health Officer Swabi.

For information and necessary action w/r to his letter

No. _____ Dated _____

REGISTERED

3. District Accounts Officer, Swabi for information. A copy of the health and age certificate in respect of the above name Doctor is sent herewith for record in his office.

A.E-IV, Health Directorate NWFP Peshawar for information

Divisional Director Health Service Peshawar for information.

for DIRECTORATE HEALTH SERVICES
NWFP, PROVINCE PESHAWAR

13

1. Dr. <u>Imdad Raque</u>	1st BHU Maren poptt: (Kohistan). (PSC)	
2. Dr. <u>Muramallah Khelil</u>	, do, BHU Mera Ladde Khel (Lensehra).	, do,
3. Dr. <u>Diqaq Ali Sheh.</u>	, do, BHU Jijel (Kohistan).	, do,
4. Dr. <u>Muhammad Salim.</u>	, do, TMO HSTH Peshawar (Part-I).	Against the Reserve Post.
5. Dr. <u>Abdul Ghafar.</u>	, do, BHU Otela (Dir).	Against the vacant post
6. Dr. <u>Gul Mansher.</u>	, do, BHU Kero Berd (Dir Distt:)	, do,
7. Dr. <u>Mera Hanif Pasha.</u>	, do, BHU Khemari (Lensehra).	, do,
8. Dr. <u>Khalid Iqbal.</u>	, do, BHU Babuzai (Lardan).	, do,
9. Dr. <u>Diqaq Ali.</u>	, do, BHU Berd Dard (Dir).	, do,
10. Dr. <u>Jehanzel Khan.</u>	, do, BHU Merna Dard (Dir Distt:).	, do,
11. Dr. <u>Muhammad Ismail.</u>	, do, BHU Jijel (Kohistan).	, do,
12. Dr. <u>Asgharullah Khan.</u>	, do, BHU Dabai Bela (Kohistan).	, do,
13. Dr. <u>Sayed Iqbal.</u>	, do, BHU Jalkot (Kohistan).	, do,
14. Dr. <u>Jamil Anwar.</u>	, do, BHU Jette Ismail Khel (Kere).	, do,
15. Dr. <u>Muhammad Nauman Khan</u>	, do, BHU Kundien (Kohistan).	, do,
16. Dr. <u>Kiramatalleh Khan</u>	, do, BHU Piecha Bala (Kohistan).	, do,
17. Dr. <u>Musarat Ali</u>	, do, BHU Bezid Khel (Kohst).	, do,
18. Dr. <u>Sheikh Mohd Khalid.</u>	, do, BHU Gabore (Chitral).	, do,
19. Dr. <u>Zar Saer.</u>	, do, BHU Mangelohai (Swebi).	, do,
20. Dr. <u>Falak Naz</u>	, do, BHU Khut (Chitral).	, do,
21. Dr. <u>Faqirullah</u>	, do, BHU Shetyel (Kohistan).	, do,
22. Dr. <u>Fazli Maula.</u>	, do, BHU Sharkhi Pull (Charsadda).	, do,
23. Dr. <u>Syed Jaffar Hussein.</u>	, do, BHU Kohi Hussein Khel (Peshawar).	, do,
24. Dr. <u>Miraj Khan.</u>	, do, BHU Shelkundi (PSC).	, do,

36. Dr. Rehan Yousaf.	Ist BHU Sheghor pppt: (Chitral) (PSC)	Against the vacant post.
37. Dr. Mujeebur Rehman	do, BHU Jalbala (Swabi)	do,
38. Dr. Rizwanullah	do, BHU Kphi (IR-Peshawar)	do,
39. Dr. Mushir Hussain.	do, BHU Nurpur (Bannu)	do,
40. Dr. Mohammad Saleem.	do, BHU Sewal Dher (Mardan)	do,
41. Dr. Shaukat Sohail	do, BHU Panj Ptc (Charsadda)	do,
42. Dr. Saifullah Khan	do, BHU Thali (Dir)	do,
43. Dr. Mushtaq Ahmad.	do, BHU Sheikh Juna (Swabi)	do,
44. Dr. Mohammad Siyar.	do, BHU Goldai (Dir Distt:)	do,
45. Dr. Inshallah Khan.	do, BHU Dera Haji Ise Khan. (D. I. Khan)	do,
46. Dr. M. Riazud-Din Ghorri.	do, BHU Khan Lahi (Charsadda)	do,
47. Dr. Umer Khitab.	do, BHU Hoya Sarani (Dir)	do,
48. Dr. Muhammad Arif.	do, BHU Spin Kandr (Nw. Agency)	do,
49. Dr. Muhammad Iqbal.	do, BHU Jandri (Karak)	do,
50. Dr. Naeeruddin Mish.	do, BHU Didenpure (Dir)	do,
51. Dr. Islamud Din.	do, BHU Beda Mir Abbas (Bannu)	do,
52. Dr. Muhammad Riaz	do, DHQ IOS: (Charsadda)	do,
53. Dr. Javed Nawab.	do, BHU Haved (Bannu)	do,
54. Dr. Saifeer Zaman.	do, BHU Daud Shah (Bannu)	do,
55. Dr. Saeedur Rehman.	do, BHU Shehistan (Karak)	do,
56. Dr. Ayaz Mahmood.	do, BHU Roop Khani (Lanseria)	do,
57. Dr. Jehangir Khan.	do, BHU Raghunath (Bajaur Ag:)	do,
58. Dr. Rasool Ghulam.	do, BHU Totai (S.W. Agency)	do,
59. Dr. Sultan Mohamed.	do, BHU Lar Madak (Bajaur Ag:)	do,
60. Dr. Jamshad Ali.	do, BHU Kenj Alizzi (Kurram Ag)	do,
61. Dr. Abdul Hadi.	do, BHU Ouch (Dir)	do,
62. Dr. Musrat Hussain.	do, BHU Burki (Kurram Agency)	do,
63. Dr. Hidayatullah Khan. S/O Saif Khan.	do, BHU Keshi (Orakzai Ag:)	do,
64. Dr. Nasir Khan.	do, BHU Atto Khel (Mohmand Ag:)	do,
65. Dr. Hidayatullah Khan. S.O Zahir Gul Khan.	do, BHU Kandi Orakzai (Bannu)	do,
66. Dr. Muhammad Arif Khan.	do, BHU Zarnili (S.W. Agency)	do,
67. Muhammad Junaid.	do, BHU Suleman Khel (Orakzai)	do,
68. Dr. Hadir Khan.	do, BHU Kandi Khel (Dir)	do,
69. Dr. Zahir Shah.	do, BHU Glegari (Kurram Ag:)	do,
70. Dr. Jamil Badshah.	do, BHU Charkhela (Orakzai Ag)	do,
71. Dr. Abdul Qadoos Khan.	do, BHU Yousaf Khel (Mohmand)	do,

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11	Dr. Ihsan Haque	1 st Apptt; (PEC)	BHU Noreen (Kohistan)	Against the vacant post
12	Dr. Ikramullah Khalil	"do"	BHU Mera Khel (.....)	"do"
13	Dr. Liaq Ali Shah	"do"	BHU Jagni (Kohistan)	"do"
14	Dr. Muhammad Slaim	"do"	THO HSTH Peshawar (Part-I)	"do"
15	Dr. Abdul Gafoor	"do"	BHU (Dir)	"do"
16	Dr. Gul Manshah	"do"	BHU Kero Bere (Dir Distt)	"do"
17	Dr. Imran Hanif Pasha	"do"	BHU Khemeri (.....)	"do"
18	Dr. Khalid Iqbal	"do"	BHU Babuzai (Mardan)	"do"
19	Dr. Liaqat Ali	"do"	BHU Bara Dare (Dir)	"do"
20	Dr. Jehanzeb Khan	"do"	BHU Meine ... (Dir Distt)	"do"
21	Dr. Muhammad Ismail	"do"	BHU Jilal (Kohistan)	"do"
22	Dr. Asgharullah Khan	"do"	BHU Dubair Bala (Kohistan)	"do"
23	Dr. Javed Iqbal	"do"	BHU Jelkot (Kohistan)	"do"
24	Dr. Jamil Anwar	"do"	BHU Jetts Ismail Khel (Karak)	"do"
25	Dr. Muhammad Nauman Khan	"do"	BHU Khuish (Kohistan)	"do"
26	Dr. Kiramatullah Khan	"do"	BHU Plech Bala (Kohistan)	"do"
27	Dr. Musarat Ali	"do"	BHU Bazid Khel (Kohat)	"do"
28	Dr. Sheikh Mohd Khalid	"do"	BHU Gabore (Chitral)	"do"
29	Dr. Zar Sher	"do"	BHU Mengela (Swabi)	"do"
30	Dr. Falak Naz	"do"	BHU Khut (Chitral)	"do"
31	Dr. Faqirullah	"do"	BHU Shetyali (Kohistan)	"do"
32	Dr. Fazli Maula	"do"	BHU Sherkhi Pull (Charsadda)	"do"
33	Dr. Syed Jaffar Hussain	"do"	BHU Kohi Hussain Khel (Peshawar)	"do"
34	Dr. Miraj Khan	"do"	BHU Shelkhundi (Dir)	"do"

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36	Dr. Rehan Yousaf	1 st Apptt; (PEC)	BHU Sheghor (Chitral)	Against the vacant post
37	Dr. Mujeebur Rehman	"do"	BHU Jalba (Swabi)	"do"
38	Dr. Rizwanullah	"do"	BHU Kohi (FR Peshawar)	"do"
39	Dr. Mushbir Hussain	"do"	BHU Nurer (Bannu)	"do"
40	Dr. Muhammad Saleem	"do"	BHU Swewl	"do"
41	Dr. Shoukat Sohail	"do"	BHU Panj (Charsadda)	"do"
42	Dr. Sahibzada Yaqub	"do"	BHU Tahall (Dir)	"do"
43	Dr. Mushtaq Ahmad	"do"	BHU Sheikh (Swabi)	"do"
44	Dr. Muhammad Siyar	"do"	BHU Goldei (Dir District)	"do"
45	Dr. Inshallah Khan	"do"	BHU Dera Haji Ist Khan (D.I.K)	"do"
46	Dr. M. Riaz Din Khan	"do"	BHU Khan (Charsadda)	"do"
47	Dr. Umer Khitab	"do"	BHU Hayes Serdi (Dir)	"do"
48	Dr. Muhammad Arif	"do"	BHU Spin Kamdr (N.W.Agency)	"do"
49	Dr. Muhammad Iqbal	"do"	BHU Didepur (Dir)	"do"
50	Dr. Naseeruddin Mish	"do"	BHU Didenpure (Dir)	"do"
51	Dr. Islamud Din	"do"	BHU Beds Mir (Bannu)	"do"
52	Dr. Muhammad Riaz	"do"	DHQ NOS: (Charsadda)	"do"
53	Dr. Javed Nawab	"do"	BHU Haved (Bannu)	"do"
54	Dr. Safeer Zaman	"do"	BHU Dsud Shah (Bannu)	"do"
55	Dr. Saeedur Rehman	"do"	BHU Shehiden (Karak)	"do"
56	Dr. Ayaz Mehmood	"do"	BHU Roop Khan (Mansehra)	"do"
57	Dr. Jahangir Khan	"do"	BHU Reghsnan (Bajaur Agency)	"do"
58	Dr. Rasool Ghulam	"do"	BHU Totai (S.W.Agency)	"do"
59	Dr. Sultan Mohammad	"do"	BHU Ler..... (Bajaur Agency)	"do"
60	Dr. Jamshed Ali	"do"	BHU Kenj Alizai (Kurram Agency)	"do"
61	Dr. Abdul Hadi	"do"	BHU Ouch (Dir)	"do"
62	Dr. Mussrat Hussain	"do"	BHU Burki (Kurram Agency)	"do"
63	Dr. Hidayatullah Khan S/o Sail Khan	"do"	BHU Keshs (Orakzai)	"do"
64	Dr. Nasir Khan	"do"	BHU Atto Khel (.....)	"do"
65	Dr. Hidayatullah Khan S/O Zeeshan Ghul Khan	"do"	BHU Kaohi Qamar (Bannu)	"do"
66	Dr. Muhammad Afrif	"do"	BHU Zermilan (S.W. Agency)	"do"
67	Dr. Muhammad Junaid	"do"	BHU Suleman Khel (Orakzai)	"do"
68	Dr. Hadir Khan	"do"	BHU KHedikzei (Dir)	"do"
69	Dr. Zahir Shah	"do"	BHU Chezgeri (Kurram Agency)	"do"
70	Dr. Jamil Badshah	"do"	BHU Cherkhele (Orakzai Agency)	"do"
71	Dr. Abdul Qadoos Khan	"do"	BHU Yousaf Khel (Mohmand)	"do"

14

- 53. Dr. Javed Nawab S/O Sher Nawab.
- 54. Dr. Saifeer Zaman S/O Gul Shah Zaman.
- 55. Dr. Saeedur Rehman S/O Ghulam Rasool Khan.
- 56. Dr. Ayaz Mahmood S/O Minajul Haque.
- 57. Dr. Jehangir Khan S/O Khachan.
- 58. Dr. Rasool Ghulam S/O Faqir Ghulam.
- 59. Dr. Sultan Muhammad S/O Hakimat Sheh.
- 60. Dr. Jamsheed Ali S/O Yusef Hussain.
- 61. Dr. Abdul Hadi S/O Muhammad Yousaf.
- 62. Dr. Musayyab Hussain S/O Hussain Gul.
- 63. Dr. Hidayatullah Khan S/O Saif Khan.
- 64. Dr. Neer Khan S/O Faqir Muhammad Khan.
- 65. Dr. Hidayatullah Khan S/O Beshir Gul Khan.
- 66. Dr. Mohammed Arif Khan S/O Musa Khan.
- 67. Dr. Ahmed Junaid S/O Kamel Badshah.
- 68. Dr. Nadir Khan S/O Rozen Din.
- 69. Dr. Zahir Shah S/O Pir Badshah.
- 70. Dr. Jamil Badshah S/O Yar Badshah.
- 71. Dr. Abdul Qadoos Khan S/O Malik Nadeem Gul.
- 72. Dr. Abdul Haque S/O Muhammad Saeed.
- 73. Dr. Farmanullah S/O Gul Nawab Khan.
- 74. Dr. Zakir Mahmood S/O Latif Khan.

ATTACHED

On their appointment as Medical Officer (BS-17), in the Health Department Government of N.W.F.P, the following posting/transfers here by ordered with immediate effect in the public interest :-

Sr.	Name.	From.	To.	Remarks.
1.	Dr. Z. Kaulah Khan	Ist Apptt: (PSC).	BHU Lamakhel (Nowshera).	Against the vacant Post.
2.	Dr. Muhammad Naeem Khan	-do-	BHU Batera Payeen (Kohistan).	-do-
3.	Dr. Qaiser Inayat.	-do-	CD Misri Bende (Nowshera).	-do-
4.	Dr. Waqar Ahmed.	-do-	RHC Betagram (Charsadda).	-do-
5.	Dr. Amanullah	-do-	BHU Kelkot (Dir).	-do-
6.	Dr. Maseemul Haq.	-do-	BHU Akhoun Bheri (Charsadda).	-do-
7.	Dr. Muhammad Ilyas.	-do-	BHU Lohdand (Charsadda).	,do,
8.	Dr. Iqbal Muhammad.	,do,	BAU Phari Kati Khel (Nowshera).	,do,
9.	Dr. Naseer Ahmed.	,do,	BHU Bakkehali (Iardan).	,do,
10.	Dr. Sajjad Ahmed.	,do,	BHU Qalendi	

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53	Dr. Javed Nawab S/O Sher Nawab
54	Dr. Safeer Zaman S/O Ghul Shah Zaman
55	Dr. Saeed ur Rehman S/O Ghulam Rasool Khan
56	Dr. Ayaz Mehmood S/O Minhajul Haque
57	Dr. Jehangir Khan S/O Khachan
58	Dr. Rasool Ghulam S/O Faqir Ghulam
59	Dr. Sultan Muhammad S/O Hikmat Shah
60	Dr. Jamshed Ali S/O Yousaf Hussain
61	Dr. Abdul Hadi S/O Muhammad Yousaf
62	Dr. Musarat Hussain S/O Hussain Gul
63	Dr. Hidayatullah Khan S/O Sail Khan
64	Dr. Nasir Khan S/O Faiq Muhammad Khan
65	Dr. Hidayatullah Khan S/O Bashir Gul Khan
66	Dr. Mohammad Arif Khan S/O Musa Khan
67	Dr. Ahmed Junaid S/O Kamel Badshah
68	Dr. Nadir Khan S/O Roshan Din
69	Dr. Zehir Shah S/O Pir Badshah
70	Dr. Jamil Badshah S/O Yar Badshah
71	Dr. Abdul Qadoos Khan S/O Malik Nadeem Gul
72	Dr. Abdul Haque S/O Muhammad Saeed
73	Dr. Farmanullah S/O Gul Nawaz Khan
74	Dr. Zakir Mehmood S/O Latif Khan

On their appointment as Medical Officer (BS-17) in the Health Department Government of NWFP the following posting / transfer by ordered with immediate effect in the public interest:-

S.No.	Name	From	To	Remarks
1	Dr. Zakeullah Khan	1 st Apptt; (PEC)	BHU Menskhel (Nowshera)	Against the vacant post
2	Dr. Muhammad Naeem Khan	"do"	BHU Bateras Payeen (Kohistan)	"do"
3	Dr. Qaiser Inayat	"do"	CD Misri Banda (Nowshera	"do"
4	Dr. Waqar Ahmad	"do"	RHC Batagram (Charsadda)	"do"
5	Dr. Amanullah	"do"	BHU Kelkot (Dir)	"do"
6	Dr. Naseemul Haq	"do"	BHU Akhoon Bheri (Charsadda	"do"
7	Dr. Muhammad Ilyas	"do"	BHU (Charsadda)	"do"
8	Dr. Iqbal Muhammad	"do"	BHU Phari Kati Khel (Nowshera)	"do"
9	Dr. Naseer Ahmad	"do"	BHU Bakhali (Mardan)	"do"
10	Dr. Sajjad Ahmad	"do"	BHU Qalandi	"do"

14

(Annex - B)

15

OFFICE ORDER.

DIRECTORATE GENERAL SERVICES
N.W.F.P. PESHAWAR

Mr. Ali Ghay Khan, NO. 810, Janda (District Swabi) is hereby transferred and posted in the K-TH, Peshawar against the vacant post, in the interest of public service with immediate effect, in relaxation on ban by the concerned authority.

SP/EXAMINATIONS
Director General Health
SERVICES, N.W.F.P. PESHAWAR

NO. 15928 36 /2.I, DATED PESHAWAR 6

Copy forwarded to the:-

- 01. Secretary to Govt of NWFP Health Department Peshawar.
- 02. Divl: Director Health Services, Peshawar.
- 03. A.E. to the Minister for Health NWFP, Peshawar transfer w/r to the approval of Health Minister on 04.06.1998.
- 04. Distt: Health Officer, Swabi.
- 05. Administrator, HSTH, Peshawar.
- 06. Accountant General, NWFP, Peshawar.
- 07. Distt: Accounts Officer, Swabi.
- 08. AE.IV, BSHS, Office, NWFP, Peshawar.
- 09. Doctor Concerned.

ATTESTED

For Information and n/action.

For Director General
Services, NWFP

6/6

ABDUL ALI KHAN
05.06.1998.

**DIRECTORATE GENERAL SERVICES
NWFP PESHAWAR**

OFFICE ORDER

Dr. Ali Gohar Khan, No. BHU Janda (District Swabi) is hereby by transferred and posted in the KTH Peshawar against the vacant post in the interest of public service with immediate effect, in relaxation on ban by the concerned authority.

SD/xxxxxxxxxx
DIRECTORATE HEALTH SERVICES
NWFP, PROVINCE PESHAWAR

S.NO. 15928-36 E-I

Dated Peshawar 6 _____

Copy forwarded to the:-

1. Secretary to Govt: of NWFP Health Peshawar.
2. Divi; Directorate Health Services, Peshawar.
3. A.E. to the Minister for Health NWFP, Peshawar transfer w/f to the approval of Health Minister on 04-06-1998.
4. Distt; Health Officer, Swabi.
5. Administrator, HSTH, Peshawar.
6. Accountant General, NWFP, Peshawar.
7. Distt; Accounts Officer, Swabi.
8. AE.IV, DGHS, Officer, NWFP, Peshawar.
9. Doctor concerned.

For information and necessary action.

SD/xxxxxxxxxx
DIRECTORATE HEALTH SERVICES
NWFP, PROVINCE PESHAWAR

ABDUL ALEEM

06-06-1998

(Annex - C)

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16

GSAPD. N.W.P. 600 I.S. 3,000-P. of 100 9.9.91(23)

APPLICATION FOR LEAVE

Notes:- Item 1 to 9 must be filled in by all applicants. Item 12 applies only in the case of Government servants of B.P.S. 16 and above.

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Name of applicant. DR ALIGOHAR KHAN

Leave Rules applicable.

Post held. Registrar

Department or office. Surgery

Pay. 17

House Rent Allowance/Conveyance Allowance or other compensatory allowances drawn in the present post.

(a) Nature of leave applied for. Earned leave with half pay

(b) Period of leave in days. 600 days (Six Hundred days)

(c) Date of commencement. 20/12/04

Particular Rule/Rules under which leave is admissible.

(a) Date of return from last leave. NA

(b) Nature of leave.

(c) Period of leave in days

Date 15/12/04

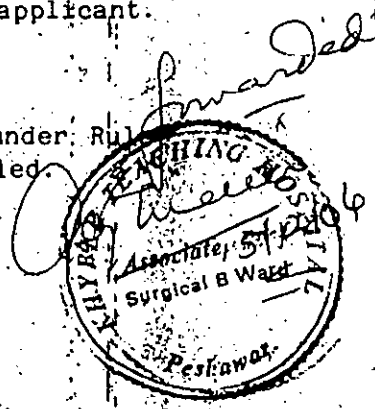
Signature of applicant. [Handwritten Signature]

Remarks and recommendation of the Controlling Officer.

1. Certified that leave applied for is admissible under Rule and necessary conditions are fulfilled

Date

Signature Designation



2. Report of Audit Officer.

Date

Signature Designation

3. Orders of the sanctioning authority certifying that on the expiry of leave the applicant is likely to the same post carrying the compensatory allowance being drawn by him.

Date

Signature Designation

That the above mentioned doctor is entitled for 600 days and half pay under the revised Government 1981

Signature of Controlling Officer
Controlling Officer
N.W.P. Peshawar.

Handwritten notes on the left margin: 'DR Aligohar Khan', 'MO SBW KTH', 'A.O.', 'Input for Enrolled?', '20/12/04'.

ATTESTED

2

17

GOVERNMENT OF N.W.F.P.
HEALTH DEPARTMENT

Dated Peshawar, the 2nd February, 05

NOTIFICATION

No. 00 11-5/2004: Sanction is hereby accorded to the grant of 600 days Extra Ordinary Leave with effect from the case of availing (out not later than 21 days) in favour of Dr. Ali Gohar Khan Junior Registrar, Surgical B Unit KTH Peshawar.

SECRETARY HEALTH.

Encls. No. & date even.

Copy to the.

- 1. Director General, Health Services, NWFP, Peshawar.
- 2. AG NWFP Peshawar.
- 3. Chief Executive, KTH Peshawar.
- ✓ 4. Doctor Concerned.

[Handwritten Signature]
ATTESTED

[Handwritten Signature]
 (Ijaz Khan Khattak)
 Section Officer - II.

has been called
EX-1
Approved
NWP
ac

10 y 100
2-100
1/1/2005

AGP
Geo

**GOVERNMENT OF NWFP
HEALTH DEPARTMENT**

Dated; Peshawar, 2nd February, 05

NOTIFICATION

No.00 _____/1.5./2004 Sanction is hereby according to the grant of 600 days Extra Ordinary Leave with effect from the case of availing (out not later than 21 days) in favour of Dr. Ali Gohar Khan Junior Registrar Surgical B-Unit KTH Peshawar.

SECRETARY HEALTH

Ends No.8 date even

Copy to the:-

1. Directorate General, Health Services, NWFP, Peshawar
2. AG NWFP Peshawar.
3. Chief Executive, KTH Peshawar.
4. Doctor concerned.

(..... Khan Khattak)
Section Officer-II

(Sanctioned)

18

GOVERNMENT OF N.W.F.P.
HEALTH DEPARTMENT

Dated Peshawar, the 31st January 2007.

NOTIFICATION.


No. SO(E)H-II/1-5/2006. Sanction is hereby accorded to the grant of extension for 730 Extra Ordinary Leave with effect from 20.10.2006 in favour of Dr. Ali Gohar Khan, Medical Officer, Health Department.

SECRETARY HEALTH.

Enclst. No. & date even.

Copy to the:-

1. Director General, Health Services, NWFP Peshawar.
2. AG NWFP Peshawar.
3. Doctor concerned.


(Maqbool Khan Khattak)
Section Officer-II.


ATTESTED

(Annen - E)

(19)

GOVERNMENT OF N.W.F.P.
HEALTH DEPARTMENT.

Dated Peshawar, the 4th June 2009.

NOTIFICATION.

No. SO(E)H-II/4-1/2009. The following posting/transfers of Medical Officer (BS-17) are hereby ordered with immediate effect in the public interest.

S. No.	Name of doctor	From	To
1	Dr. Ali Gohar (waiting for posting)	Under transfer to Distt: Shangla.	MO DHQH Mardan.
2	Dr. Niaz Muhammad, MO LRH Peshawar.	Under transfer to DHQH Mardan.	Retained as MO LRH Peshawar under spouse policy.

SECRETARY TO GOVT. OF NWFP
HEALTH DEPARTMENT.

Endst. No. & date even.

Copy to the:-

1. Director General, Health Services, NWFP Peshawar
2. MS LRH Peshawar.
3. MS DHQH Mardan.
4. EDO (H) Shangla.
5. DAO Mardan/Shangla.
6. PS to Minister for Health.
7. PS to Secretary Health.
8. PS to Special Secretary Health.
9. Doctors concerned.

ATTESTED

Section Officer-II

Copy also available on the website www.healthnwfp.gov.pk

6/50
6/6/09

13/12
8/6

200/6
7/6

(20)


To,

The Naval Surgeon
Dharwad Naval

Sub Annual Report

Ref. will ref. to your kind
Office order no 4664-67 dt 11-6-09,
I beg to submit my Annual Report
of duty on 10-6-09. and also
dxc rpt (six copies) are
attached hereto.

ATTESTED

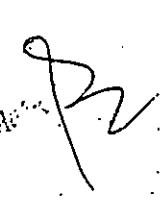
Yours sincerely


Date 10/6/09.

Forwarded to
M.S. for O/A.

Dr. A. L. Gohar
MO of the
Naval Post of Surgeon
Dharwad Naval

4700 dt 13/6/09
Acct
A. M. S.



A. M. S.
S. M. S.
etc.

21

DIRECTORATE OF FINANCE

KMC/KCD/KHYBER TEACHING HOSPITAL PESHAWAR

No: Audit/c/27/09/DF/KTH

Dated:24/06/2009

LAST PAY CERTIFICATE

P.No. 99992700256

GP Fund A/c No:JMSWB00031

Last Pay Certificate of Dr. Ali Gohar (BPS-17) Junior Registrar

Peshawar, proceeding on Transfer to DHQH Mardan

He has been paid up to & for 28/2/2005 at the following rates:-

B.Pay	SAA	NPA	SRA	Adhoc Relief	HRA	Ent:All	CA	Dearness	Total
12255	776	500	1838	1838	-----	-----	-----	-----	17207

DEDUCTIONS

G.P.F	B.F	G.Ins	I.Tax	HR 5%	Gas	Elec	Total
870	76	150	427	590	500	1000	3613

1. He made over charge of the office of Junior Registrar (BPS17) on the afternoon of 28/02/05

2. Recoveries are to be made from the pay of the Govt: servant as detailed given below:-

DETAILS OF RECOVERIES

S.No	Nature of Recovery	Amount	Recovered	Balance	Instalments	Rates.

SERVICE STATEMENT

Prior to 1/9/2002 He was under the audit control of A.G NWFP Peshawar.

ALLOWANCES

Period	Pay	NPA	SAA	SRA	Ent: All	Ahc: Rel	C.A	HRA	Dearness	Total
1/09/2002	10860	500	776	-----	-----	-----	340	1291	-----	14232
1/12/2002	11325	500	776	-----	-----	-----	340	1291	-----	14232
1/7/2003	11325	500	776	1699	-----	-----	340	1291	-----	15931
1/12/2003	11790	500	776	1769	-----	-----	-----	1291	-----	16126
1/7/2004	11790	500	776	1769	-----	1769	-----	-----	-----	16604
1/12/2004	12255	500	776	1838	-----	1838	-----	-----	-----	17207

Remarks: Transfer to DHQH Mardan Vide: under Notification No SO(E)H-II/4-1/2009 dated 4/06/09

ATTESTED

Audit Officer
KTH/KMCK/CD
Peshawar.

22

(Annen - F)

TO

The Secretary to Govt. of NWFP,
Health Department, Civil Secretariat,
Peshawar

Through; proper channel

subject: APPLICATION FOR LEAVE FOR 5 YEARS WITH
EFFECT FROM 1-08-2009.


Respected sir,

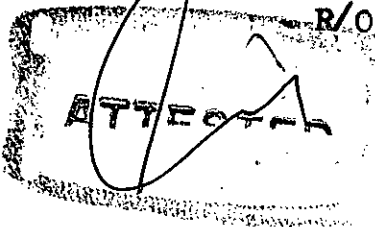
I am working as Medical Officer (B-17) at DHQ Hospital
Mardan.

I am in need of 5 years leave with effect from
1-08-2009 for personal matter.

It is, therefore, requested that I may please be
granted 5 years leave with effect from 1-08-2009 and obliged.

Dated 17/7/2009


Dr. Ali Gohar Khan,
Medical Officer,
DHQ Hospital, Mardan



R/O
Warsak Road, District
Peshawar

c/o Yaq Khan Manager
Zai Apartments
Warsak Road Peshawar



P-I

Armeu (H) (24)

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Dated Peshawar, the 10th July, 2014

No. SOE(H-II/10-25/2014: WHEREAS, disciplinary proceedings, were initiated against the following doctors, Drug Inspector for their wilful absence from duty:

S.#	Name of Doctor	Place of Posting	Date of absence
1.	Dr. Raza Hassan MO(BS-17)s/o Nazir Hussain,	TMO PGMI Peshawar under transfer to Forensic Medicine Deptt: KMC, Peshawar.	15.08.2012
2.	Dr. Salah-ud-Din Ayubi MO (BS-17)s/o Ghulam Qadir	Demonstrator BKMC Mardan.	25.06.2012
3.	Dr. Muhammad Faisal MO (BS-17) s/o Juam Gui	Sahad Hospital for Psychiatric Diseases Peshawar.	04.11.2011
4.	Dr. Abdul Majeed Sheikh MO (BS-17)s/o Abdus Salam Sheikh	TMO PGMI Peshawar.	00.09.2001
5. ✓	Dr. Asif Hayat Khan MO (BS-17) s/o Mir Rehman	TMO PGMI Peshawar.	00.02.2010
6. ✓	Dr. Ali Gohar Khan MO (BS-17)s/o Badshah Khan	DHQ: Hospital Mardan.	01.08.2009
7.	Dr. Farah Deebe WMO (BS-17)D/o Khurshid Zaman	RHC Toru, Mardan.	30.09.2007
8.	Dr. Haseena Khan WMO(BS-17)D/O Muhammad Firdous Khan	HMC Peshawar.	01.02.2011
9.	Dr. Muhammad Ishfaq, Dental Surgeon (BS-17)s/o Malik Suba Khan	Karwan FR-Tank.	29.06.2007
10.	Dr. Nadia Kalsoom WMO (BS-17)D/O Abdul Sattar Khan	KTH Peshawar.	01.09.2010
11.	Dr. Nasim Akhtar WMO (BS-17)D/O Muhammad Karim	Civil Hospital Chamla, Buner.	15.12.2008
12.	Dr. Rizwan Amin Jan Kundi MO (BS-17)s/o Amin Jan Kundi	TMO PGMI Peshawar.	00.02.2010
	Dr. Babar Abbasi MO (BS-17)s/o Muhammad Muzaffar Khan	TMO PGMI Peshawar.	00.07.2002
	Dr. Rukhsana WMO(BS-17) D/O Siraj Muhammad	ESH Pabbi Nowshera.	00.06.2011
	Dr. Amir Zeb Khan MO (BS-17)s/o Aurangzeb	TMO PGMI Peshawar.	01.07.2005
	Dr. Rukhsana Jalal WMO (BS-17)D/O Abdul Jalal	TMO PGMI Peshawar.	01.11.2010
	Dr. Faheemullah, Dental Surgeon (BS-17)s/o Abdul Rais Khan	Chorlaki Kohat.	00.05.2010
	Dr. Qayum Shah MO (BS-17)s/o Malik Israfil Shah	Civil Hospital Thal Hangu.	25.11.2010

19.	Dr. Zakiya Anjum Khattak WMO(BS-17)D/O Mir Ghazan Khan Khattak	King Abdullah Teaching Hospital Mansehra.	29.09.2010
20.	Dr. Taimur Khan MO (BS-17)s/o Afzal Amin	TMO PGMI Peshawar.	01.06.2010
21.	Mr. Shams-ur-Rehman Drug Inspector (BS-17) s/o Muhammad Miskeen	Attached to the office of DHO Battagram.	00.11.2009
22.	Dr. Amjad Sheraz MO (BS-17)s/o Gul Sheraz Khan	BHU Bazez Khel Bannu.	10.09.2007
23.	Dr. Muhammad Tariq MO (BS- 17)s/o Qais Gul	KTH Peshawar.	07.12.2012
24.	Dr. Muhammad Zubair Masaud MO (BS-17)s/o Muhammad Masaud	BHU Urmar Miayana, Peshawar.	06.11.2011
25.	Dr. Aqeel Ahmed MO (BS-17)s/o Muhammad Hafiz Ali	KTH Peshawar.	01.05.2010

AND WHEREAS, absence notices were served upon them on their home addresses and also through press with the direction to resume duty within stipulated period.

AND WHEREAS, they failed to resume duty within the stipulated period given in the notices.

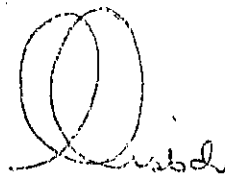
NOW THEREFORE, in exercise of powers conferred under Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011, Competent Authority is pleased to impose the major penalty of REMOVAL FROM SERVICE upon the above mentioned doctors, drug Inspector with immediate effect. The period from the date of absence till the date of imposition of penalty in respect of the above, shall be treated as unauthorized absence from duty without pay.

SECRETARY HEALTH
KHYBER PAKHTUNKHWA

Endst. No. & even, dated 16th June, 2014.

Copy to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Peshawar.
3. Director Health Services FATA Peshawar.
4. Principal BKMC Mardan.
5. All Medical Superintendents, Khyber Pakhtunkhwa.
6. All District Health Officers, Khyber Pakhtunkhwa.
7. All Accounts Officers, Khyber Pakhtunkhwa.
8. Deputy Director (IT), Health Department.
9. PS to Minister for Health Department.
10. PS to Secretary Health.
11. PA to Special Secretary Health.
12. Officers concerned.



(Misbah Riaz)
Section Officer (E-II)

25

A copy of the above is forwarded to:-

1. Dean PGMI Peshawar.
2. DHS FATA Peshawar.
- 3-7. MS KTH /HMC/DHQ Hospital Mardan/Sarhad Hospital for Psychiatric Diseases Peshawar/King Abdullah Teaching Hospital Mansehra.
8. Principal Khyber Medical College Peshawar/Bacha Khan Medical College, Mardan.
- 10-18. DHO, Peshawar/Nowshera/Mardan/Buner/Battagram/Kohat/Hangu/Bannu/Mansehra.
19. AG KPK, Peshawar.
- 20-26. DAO Nowshera/Mardan/Buner/Battagram/Kohat/Hangu/Bannu.
- 27-29. AE-I/AE-II/AE-IV DGHS office KPK Peshawar.

REGISTERED:-

30. Dr. Raza Hassan S/O Nazir Hussain MO (BS-17) 172-New Defence Colony, Shami Road, Street No. 13, Peshawar Cantt.
31. Dr. Salah-ud-Din Ayubi S/O Ghulam Qadir MO (BS-17) Bangla No. 475, Sect. Gali- 15, Sheikh Maltoon Town Mardan.
32. Dr. Abdul Majeed Sheikh S/O Abdus Salam Sheikh MO (BS-17) House No.-7, Kashmir Lodge Arbab Tehkal Bala Peshawar.
33. Dr. Muhammad Faisal S/O Juma Gul MO (BS-17) Gul House, Canal Road, Academy Town Near Indus Grammar School, Peshawar.
34. Dr. Asif Hayat Khan S/O Mir Rehman MO (BS-17) House No. 2 City Circular Road Outside Lahori Gate near Nishtarabad Tube well Peshawar City.
35. Ali Gohar S/O Badshah Khan MO (BS-17) Malakand Road Takht-i-Bahi Distt: Mardan.
36. Dr. Farah Deeba D/O Khurshid Zaman WMO (BS-17) H-No. 129 Moh Zsheer-ud-Din Golden Cinema Road Mardan.
37. Dr. Haseena Khan D/O Muhammad Firdous Khan MO (BS-17) 66-Jinnah Abad Town, Abbottabad.
38. Dr. Muhammad Ishfaq, S/O Malik Suba Khan D/S (BS-17) Village & P.O Jattal Teh. & Distt: D.I Khan.
39. Dr. Nadia Kalsoom D/O Abdul Gattar WMO (BS-17) House No. G-25 old Jamrud Road University Town Peshawar/ Village Uaghi MusaKhen Banda Tehsil Takht-e-Nasrati Distt: Karak.
40. Dr. Nasim Akhtar D/O Muhammad Karim WMO (BS-17) Mohallah Muslim Abad No. 2 Gujjo Khan Road Mardan.
41. Dr. Rizwan Amin Jan Kundi S/O Amin Jan Kundi MO (BS-17) Mohallah Noor Khani Khel Village Pai Distt: Tank.
42. Dr. Babar Abbasi S/O Muhammad Muzaffar Khan MO (BS-17) Village & P.O Danah Sharif P.S Lora Tehsil & Distt: Abbottabad.
43. Dr. Rukhsana D/O Siraj Muhammad WMO (BS-17) Amankot Post office Pabbi Tehsil & Distt: Nowshera.
44. Dr. Amir Zeb Khan S/O Aurangzeb Khan MO (BS-17) Zeb House, Street No. 3 House No. 398, Jinnah Abad Abbottabad.
45. Dr. Rukhsana Jalal D/O Abdul Jalal MO (BS-17) Village Sahibabad, Kuzal Dureshkhela P.O Matta Distt: Swat.
46. Dr. Fahimullah S/O Abdul Rais Khar. D/S (BS-17) P.O & Tehsil Takht-e-Nasrati Distt: Karak.
47. Dr. Qayum Shah S/O Malik Israfil Shah MO (BS-17) Custom Road Barin Chowk Thall City Distt: Hangu.
48. Dr. Zakiya Anjum Khattak D/O Mir Ghazan Khan Khattak WMO (BS-17) House No. 356, Street No. 6, Sector F-5, Phase II, Jyatabad Peshawar.
49. Dr. Taimur Khan S/O Afzal Amin MO (BS-17) Mohalla Musa Khel Village Top Tehsil & Distt: Swabi.
50. Mr. Shams-ur-Rehman S/O Muhammad Miskeen Drug Inspector (BS-17) Zia Hospital Shergarh Road Oghi Distt: Mansehra.
51. Dr. Amjad Sheraz S/O Gul Sheraz Khan MO (BS-17) Opposite to City Homeopathay Hospital Near Pakistan International Pyublic School Seity town Haji Camp Peshawar.
52. Dr. Muhammad Tariq S/O Qais Gul MO (BS-17) Mohalla Azdin Khel, Village Mali Khel Payan P.O Box Akora Khattak Tehsil & Distt: Nowshera.
53. Dr. Muhammad Zubair Masud S/O Muhammad Masud MO (BS-17) 12-F Khushal Khan Khattak Road University Town Peshawar.
54. Dr. Aqeel Ahmad S/O Muhammad Hafiz Ali MO (BS-17) Bait-ur-Ali Banker's Street Gulberg No. 2 Peshawar Cantt.

ATTESTED

Assistant Director (P.U)

DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA, PESHAWAR

Cc: -

Secretary to Govt. of KPK Health Department Peshawar for information.

13/8

(Annex 1)

26

To,

The Govt of KPK
Through Chief Secretary,
Civil Secretariat, Peshawar

Subject: Departmental Appeal/ Representation
against the Notification bearing Endst
No.15107-62/E-1 dated 13.08.2014.

Respected Sir,

The applicant submits as under:

ATTESTED

1. That the appellant was appointed as Medical Officer vide Notification bearing Endorsement No.10928-32/E-1 dated 10.06.1992. (Copy of the notification is enclosed as Annexure "A").
2. That the appellant was transferred to DHQ, Mardan vide Notification bearing No.SO(E)H-/4-1/2009 dated 04.06.2009 and the appellant took over charge on 10.06.2009 as Medical Officer at DHQ Hospital, Mardan. (Copy of the transfer order, arrival report and charge report are enclosed as Annexure "B, B/1 & B/2").
3. That the appellant vide his application dated 17/7/2009 applied for 5 years leave w.e.f. 01.08.2009. (Copy of the application is annexed as Annexure "C").
4. That the appellant while inquiring about his posting in the month of first week in August, 2014, was told that

5. That the impugned notification is without lawful authority and illegal hence liable to be reversed.

It is, therefore, humbly prayed that on acceptance of departmental representation/departmental appeal the impugned notification may please be set aside and the applicant/appellant may kindly be reinstated in service with all back benefits.

Any other relief which the applicant/appellant has not asked for specifically and the applicant/appellant is entitled in the given circumstances may also be granted to the applicant/appellant.

Applicant/Appellant

ATTESTER

Dr. Ali Gohar Khan
S/o Badshah Khan
Flat. No.1, 2nd Floor, Zai
Apartments, Warsak Road,
Peshawar
Cell No.0333-9118809

Dated 13/01/2016

(Amman J)

28

Professor

Dr. Tariq Afridi

Orthopedic Surgeon
FCPS (Ortho), MACS (USA)
tafridi12345@gmail.com
Cell: 0345-9087895
0302-5904132



پروفیسر
ڈاکٹر طارق آفریدی

آرٹھوپیدک سرجن
ماہر امراض: ہڈی، جوڑ، ہتھ، کمر، گردن
نزدناؤن 3 آفس یونیورسٹی روڈ یونیورسٹی ٹاؤن پشاور

Name: DR. ALI GOWAR Sex/Age 56 yrs Date 11-04-2016

- c/c
- Severe low backache
radiating to both legs,
- Difficulty in walking

Shk - Rt - 60
 Lt - 60

Ad
MRI L/spine

Ad

— Physiotherapy for
03 Months.

— Tab. Movap 2mg
1 — 1 x 2 weeks

— Tab. Brexin
20mg
1 — 1 x 2 weeks

— Cap. Risedal
(جاری) - 1

— Ad Complete Bed rest for
06 Months w/e 11-04-2016

Dr. Tariq Afridi
MBBS, FCPS (Ortho)
Professor of Orthopaedic Surgery
Jinnah Medical College Peshawar

بروز اتوار سردار ہسپتال صوابی 0938-223656

Professor

Dr. Tariq Afridi

Orthopedic Surgeon

FCPS (Ortho), MACS (USA)

tafridi12345@gmail.com

Cell: 0345-9087895

0302-5904132



29

پروفیسر

ڈاکٹر طارق آفریدی

آرتھو پیڈک سرجن

ماہر امراض: ہڈی، جوڑ، ٹخہ، کمر، گردن

نزدناؤن 3 آفس یونیورسٹی روڈ یونیورسٹی ٹاؤن پشاور

Name: DR. AZI GOKHAR Sex/Age 56 yr Date 12-10-2016

ep
Severe Low Backache
radiating to both
legs with restricted
movements

MRI: L4-5 Disc
prolapse.

- P.
- Tab. Brevin 20mg
1-1
- Tab. Ternilin 2mg
1-1
- Cap. Rizel 20mg
1-1

- Avoid driving / Journey
for 06 Months

- Continue Physiotherapy

Dr. Tariq Afridi
MBBS, FCPS (Ortho)
Professor of Orthopaedic Surgery
Jinnah Medical College Peshawar

0938-223656 بروز اتوار سردار ہسپتال صوابی

300

Professor

Dr. Tariq Afridi

Orthopedic Surgeon
FCPS (Ortho), MACS (USA)
tafridi12345@gmail.com
Cell: 0345-9087895
0302-5904132



پروفیسر
ڈاکٹر طارق آفریدی

آرٹھو پیڈک سرجن
ماہر امراض: ہڈی، جوڑ، ہاتھ، کمر، گردن
زندناؤن 3 آفس یونیورسٹی روڈ یونیورسٹی ٹاؤن پشاور

Name: DR. Ali Gohar Sex/Age 57 yrs Date 13-04-2017

cf
- severe Low Backache
radiating to both legs.
with restricted
movements of both
lower limbs.
- Condition Improving
- No Surgery Needed

- R/-
- Tab. Neoprox 500mg
1 - 1
- Tab. Movax 2mg
1 - 1
- Cap. hisel 4mg
1 od.

- MRI - Same report repeated

- Ad Complete Bed rest
and avoidance of driving
and journey etc for another
06 months.

- Physiotherapy (impr) [Signature]

Dr. Tariq Afridi
MBBS, FCPS (Ortho)
Professor of Orthopaedic Surgery
Jinnah Medical College Peshawar

0938-223656 بروز اتوار سردار ہسپتال صوابی

30

Professor

Dr. Tariq Afridi



ڈاکٹر طارق آفریدی

آرتھو پیڈک سرجن

ماہر امراض: ہڈی، جوڑ، ہٹھ، کمر، گردن

نزدناؤن 3 آفس یونیورسٹی روڈ یونیورسٹی ٹاؤن پشاور

Orthopedic Surgeon
FCPS (Ortho), MACS (USA)
tafridi12345@gmail.com
Cell: 0345-9087895
0302-5904132

Name: DR. Aze GOWAR.

Sex/Age 57 yr Date 4-10-2017

Low Backache
radiating to
both legs.
- Much improved

Tab. Aescard 100mg
1 - 1
Tab. Alembion
1 - 1
Tab. Juvion 400mg
< 10 روزانہ ①

Ad - Bed rest for
06 Months
- Avoid driving long
journeys etc

Dr. Tariq Afridi
MBBS, FCPS (Ortho)
Professor of Orthopaedic Surgery
Jinnah Medical College Peshawar

0938-223656 بروز اتوار سردار ہسپتال صوابی

(Annex K)

32

To,

Chief Secretary,
Health Department,
Civil Secretariat,
Khyber Pakhtunkhwa,
Peshawar.

Subject:

REMAINDER OF THE DEPARTMENTAL APPEAL
SUBMITTED BY THE APPELLANT EARLIER

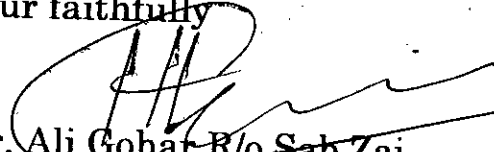
Respected Sir,

1. That the appellant had submitted departmental appeal/ representation agasint the notification bearing endorsement No. 15107-62/E-1 dated 13/08/2014 the competent authority did not informed about the fate of the appeal/representation submitted earlier by the appellant.
2. That now appellant intends to submit reminder about the departmental appeal and the fate of his representation/appeal.

It is therefore submitted remainder in your honor to decide the representation/appeal of appellant as soon as possible.

Thanks

Your faithfully


Dr. Ali Gohar R/o Sab Zai
Apartment 2nd Floor
Warsak Road Peshawar

Dated: 26-04-2018

<p>ایڈووکیٹ/دستخط بازوئیل اباد ایسوسی ایشن رابطہ نمبر: 0321-5055648</p>	<p>33445 پشاور بار ایسوسی ایشن، خیبر پختونخوا</p>	

بعدالت جناب: سروس نمبر دہرمل شہزاد

<p>منجانب: ڈائری عملی امور ڈائری عملی امور بنام: سروس نمبر دہرمل شہزاد</p>	<p>دعویٰ: علت نمبر: مورثہ نمبر: جرم: تھانہ:</p>
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بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام سہیل احمد کے لئے سروس نمبر دہرمل شہزاد کی طرف سے ڈاکٹر محمد رفیق کی طرف سے
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر کجالت و فیصلہ برصحت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں ہند دستخط کرنے کا اختیار ہوگا، نیز ضرورت میں پیروی یا اعلیٰ کی برآمدگی اور منسوقی، نیز
 دائر کرنے اعلیٰ و تقریر جانی و پیروی کرنے کا اختیار ہوگا اور ضرورت میں مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہو گا اور صاحب
 مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساتھ ہر داخہ منظور و قبول ہوگا دوران مقدمہ
 میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف کو قبول کرنے کا اختیار ہوگا کوئی تاریخ پیشی مقام
 دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی یا جزوی ہر ذمہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے۔

المرقوم: 06/07/18

عبد الوہاب

مقام: شہزاد

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

SERVICE APPEAL NO. 905-P/2018

Dr. Ali Gohar.....Appellant

Versus

Government of Khyber Pakhtunkhwa & othersRespondents.

Index

S. No.	Description	Annexure	Pages No.
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2	Letter dated 16/06/2015	A	3
3	Absence Notice	B	4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 905 OF 2018

Dr. Ali Gohar.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth,

Preliminary Objections:-

1. That the appellant has got neither cause of action nor locus standi to file the instant appeal.
2. That the appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant appeal is against the prevailing Law and Rules.
4. That the appeal is not maintainable in the present form and also in the present circumstances of the issue.
5. That the appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
6. That the appellant has not come to the Tribunal with clean hands.
7. That the appeal is time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.

ON FACTS:

1. Incorrect. He was appointed as Medical Officer on 14.04.1992 and he took charge of his duties on 23.04.1992.
2. Incorrect. He did not take interest in his duties as evident from his personal file which is full of disciplinary proceedings against him.
3. Correct.
4. Incorrect. He did not take interest in his duties as evident from his personal file which is full of disciplinary proceedings against him.
5. Correct.
6. Correct to the extent that he was granted extensions in leave for 730-days instead of 130-days mentioned in his appeal.

7. Correct.
8. Correct.
9. Incorrect. As per record of this Directorate, no application for the grant of 5-years leave as EOL without pay has been received.
10. Incorrect. As per record of this Directorate, no application of the doctor concerned for the grant of extension in leave for a period of 1-1/2 year has been received.
11. No leave was sanctioned in his favor and he absented himself from duty unlawfully for which he was proceed against E&D Rules, 2011 and after completion of all the codal formalities against him, he was removed from service by the competent authority.
12. Pertains to the record.
13. Incorrect. The Departmental appeal of the officer concerned was properly processed and considered by the competent authority and was regretted being not merit consideration vide letter dated 16.06.2015 (Annex-A).
14. No comments.
15. No comments.
16. Incorrect. A copy of Govt. letter dated 16.06.2015 under which the Departmental appeal of the officer concerned was regretted by the competent authority was properly endorsed to him at his home address.
17. No comments.

ON GROUNDS:

- A. Incorrect. Proper disciplinary proceedings were initiated against the officer concerned and after completion of all the codal formalities, (a copy of absence notice/press notice is attached as Annex-B) his services were terminated by the competent authority.
- B. Incorrect. Already explained as in Para-A, above.
- C. Incorrect. Already explained as in Para-A, above.
- D. Incorrect. The officer concerned was continuously absent from his duty without prior approval of leave. He was served with absence notice on

his postal address as well as through press to resume duty but he failed to do so.

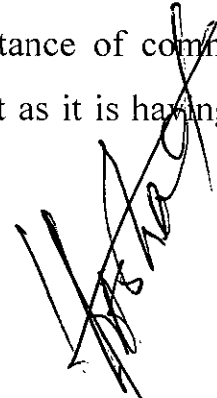
- E. Incorrect. The officer concerned was continuously absent from his duty without prior approval of leave. He was served with absence notice on his postal address as well as through press to resume duty but he failed to do so.
- F. No comments (formal).
- G. Incorrect. Proper disciplinary proceedings were initiated against the officer concerned and after completion of all the codal formalities, his services were terminated by the competent authority.
- H. Incorrect. Proper disciplinary proceedings were initiated against the officer concerned and after completion of all the codal formalities, his services were terminated by the competent authority
- I. Incorrect. Proper disciplinary proceedings were initiated against the officer concerned and after completion of all the codal formalities, his services were terminated by the competent authority
- J. No comments (Formal).

PRAYER:

It is therefore most humbly prayed that on acceptance of comments, the instant appeal may very graciously be dismissed with cost as it is having no legal footing.


21/12/2018

Secretary, Health Department, Secretary Health,
Khyber Pakhtunkhwa, Govt. Of Khyber Pakhtunkhwa,
Peshawar.
Respondent No. 02



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 03
DD (HR)

233

The Medical Superintendent
D.H.Q. Hospital Mardan.

Subject: Enquiry.

With reference to your endost: No.6617 dated 4.9.2009.

I conducted the enquiry against Dr. Ali Gohar M.O. under the complaint of Mr. Naveed Sattar Saddar ANP Sub Ward Tauheed Colony Charsadda Road Mardan marked by the chief Minister NWFP: vide his letter No.SO-II/CMS/NWFP, /1-6/2009 dated 22.8.2009 & an other Complaint of Mr.Arif Khan S/O Murad Khan R/O Sawal Dher Distt: Mardan marked to the undersigned by M.S. vide his endost: No.6499 dated 28.8.2009. I also found from the staff of Surgical Unit and from his personal file that he submitted his arrival on 10.6.2009 and he was assigned duty in Surgical unit. He remained irregular & was not taking any interest in the ward as is clear from his poor performance. He was reported several times by the Incharge Surgeon Dr. Sajjad and lastly by the Incharge Casualty Dr.Haq Nawaz. His explanation was called by the Medical Superintendent on 3.8.2009 without satisfactory reply from the concerned doctor & again on 5.8.2009 with a copy to D.G. Health NWFP:

Because of his continuous absence & repeated complaints from the Surgeon I/C of the Surgical Unit his explanation was again called on 19.8.2009 but he did not reply. He was reported to D.G. Health through letter No.6355 dated 19.8.2009. His explanation was again called on 20.8.2009 but in vain. On 26.8.2009 he was relieved to D.G. Health Office through letter No.6474 dated 26.8.2009 & D.G. Health was requested by the Medical Superintendent D.H.Q. Hospital Mardan that necessary action may be taken under the E&D Rules.

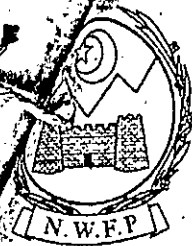
Now an enquiry was entrusted to the undersigned against Dr. Ali Gohar MO. He was called to attend the office of the Enquiry Officer on 5.9.2009 through letter No.6583 dated 1.9.2009. The letter was returned by the N/Qasid that he is not traceable in the hospital & no where about of the said Doctor is known. Then I, the enquiry officer contacted him on his Mob: No. 0333-9118809 at 10-53 AM on 4.9.2009 and personally directed him to attend my office on 5.9.2009. He failed to attend office of the undersigned.

OPINION:-

A necessary action may be taken against him under the E&D Rules and his services may be debarred any where in Pakistan.

Repri To
- D.G.
- H. Sec
- C.M

Agree
(Dr.Safiullah)
Divl: Medicolegal Officer
D.H.Q. Hospital Mardan.
7/9/09



**DIRECTORATE
GENERAL HEALTH SERVICES
N.W.F.P PESHAWAR**

Registered

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

E-Mail Address: nwfpdghs@yahoo.com
Office Ph# 091-9210269
Exchange# 091-9210187, 9210198
Fax # 091-9210230

No 39939-42/E-I
Dated: 06/10/2009

To,

Dr Ali Gohar S/o Bad Shah Khan,
Flat No 16 New Doctors Flats KTH,
Peshawar.

Dr Ali Gohar S/o Bad Shah Khan,
Malakand Road, Takht-i- Bhai District Mardan.

Subject: ABSENCE FROM DUTY

You are serving under the control of MS DHQH Mardan and as per his report you are absent from duty since 01-08-2009 for which absence notice has already been served upon you vide this Directorate No 36524-25/E-I Dated 11-09-2009 but till date there is no reply from your end.

You are directed through this notice to report for duty at your place of posting forthwith failing which action will be taken against you under the rules.

[Signature]
Dr Manzoor Anwar
Assistant Director (P-I)
Directorate General Health
Services N.W.F.P Peshawar
5/10

No _____ E-I DATED ____/10/2009

Copy forwarded to the:-

1. DMS KTH Peshawar for information with respect to his letter No 14696/KTH Dated 15-09-2009 with remarks that the officer concerned is working under the administrative control of MS DHQH Mardan (photo copy of Government notification dated 04-06-2009 is attached). Hence forwarding any application of the officer, working in DHQH Mardan, from the office of KTH Peshawar needs clarification/justification.
2. MS DHDH Mardan for information & necessary action.
3. AE-II DGHS.

Dr Manzoor Anwar
Assistant Director (P-I)
Directorate General Health
Services N.W.F.P Peshawar

روزنامہ دی نیوز
تاریخ 2011-6-30

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روزنامہ دی نیوز

پشاور پاکستان

عبدالواحد یوسفی ایڈیٹر

شمارہ 12

پشاور ایف آئی آر سے بیک وقت شائع ہونے والا صوبہ خیبر پختونخوا کا کثیر الاشاعت اخبار

جلد 22 تاریخ 29 جون 2011ء 26 رجب 1432 ہجرت 10 یونیورسٹی ایف آئی آر

FINAL ABSENCE NOTICE

The following doctors are absent from duty from the date noted against each. Absence notices were served upon them at their home addresses through registered letters with the directions to resume duty but they failed to comply with the directions. Through this press notice they are now finally directed to report for duty at their place of posting within 14 days of the publication of this notice explaining the reasons of their willful absence. In case of failure ex-parte action will be taken against them under the relevant rules which may lead to their dismissal from service. This notice is issued with the approval of the Competent authority:-

S.No	Name of Doctor/Father's Name	Place of Posting/BPS	Date of Absence
1.	Dr. Asif Hayat Khan S/O Mir Rehman	Ex-TMO (BPS-17) PGMI Peshawar.	02.2010
2.	Dr. Ali Gohar Khan S/O Badshah Khan	Ex-MO (BPS-17) DHQH Mardan	01.08.2009
3.	Dr. Amir Nawab S/O Abdul Zaman	Ex-MO (BPS-17) BHU Fateh Pur, Swat.	05.09.2010
4.	Dr. Danish Zafar D/O Zafar Ali	Ex-WMO (BPS-17) ATH Abbottabad.	10.08.2010
5.	Dr. Farah Deebea D/O Khurshid Zaman	Ex-WMO (BPS-17) RHC Toru Distt: Mardan	30.09.2007
6.	Dr. Haseena Khan D/O Muhammad Firdous Khan	Ex-WMO (BPS-17) HMC Peshawar.	01.02.2011
7.	Dr. Muhammad Ishfaq S/O Malik Suba Khan	Ex-Dental Surgeon (BPS-17) RHC Kariwam FR Tank.	29.06.2007
8.	Dr. Nadia Kalsoom D/O Abdul Sattar Khan	Ex-WMO (BPS-17) KTH Peshawar.	01.09.2010
9.	Dr. Nasim Akhtar D/O Mohammad Karim	Ex-WMO (BPS-17) CH Chamla Distt: Buner	15.12.2008
10.	Dr. Rizwan Amin Kundi S/O Amin Jan Kundi	Ex-TMO (BPS-17) PGMI Peshawar.	02.2010
11.	Dr. Sardar Qaiser Jan S/O Sardar Mohammad Jan	Ex-MO (BPS-17) CH Khanaspur (Ayubia) Distt: Abbottabad.	29.12.2010
12.	Dr. Sarah Hamid D/O Hamid Haroon	Ex-Dental Surgeon (BPS-17) CH Zarghoon Khel FR Kohat.	15.05.2010

Assistant Director (P-I)
Directorate General Health
Services Khyber Pakhtunkhwa, Peshawar

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3	Dr. Amir Nawab S/O Abdul Zaman	Ex-MO (BPS-17) BHU Fateh Pur, Swat.	05-09-2010
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12	Dr. Sarah Hamid D/O Hamid Haroon	Ex. Dental Surgeon (BPS-17) CH Zarghoon Khel FR Kohat.	15-05-2010

Assistant Director (P-I)
Directorate General Health
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

INFIP: 2101

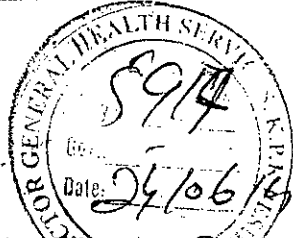
Also available on www.khyberpakhtunkhwa.gov.pk



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

34

No. SO (E) H-II/1-1/2014/Dr Ali Gohar
Dated Peshawar, the 16th June 2015



To

The Director General Health Services,
Khyber Pakhtunkhwa.

Subject: **DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE NOTIFICATION BEARING ENDORSEMENT NO.15107-62/E-I DATED 13.08.2014.**

I am directed to refer to your letter No.21372/E-I dated 10.12.2014 on the subject noted above and to state that the request of the Dr. Ali Gohar Medical Officer (BPS-17) Ex-Medical Officer (BPS-17) DHQ Hospital Mardan was considered and not found on merit consideration and regretted.

365
26/6

(Daulat Khan)
Section Officer (E-II)

Copy forwarded to:-

1. PS to Secretary Health, Khyber Pakhtunkhwa, Peshawar.
2. PA to Special Secretary Health.

Section Officer (E-II)

OFFICE OF THE DIRECTORATE GENERAL HEALTH KPK PESHAWAR

No. 10922 /E.I

Dated: 6/7/2015

Copy of the above is forwarded to Dr. Ali Gohar S/O Badsha Khan Ex-MO (BS-17) Health Department, Malakand Road Takht Bh. Distt: Mardan for information.

Assistant Director (P-I)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

9c

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BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

S.A No. 905/2018

Dr Ali Gohar

Versus

Government of Khyber Pakhtunkhwa and others

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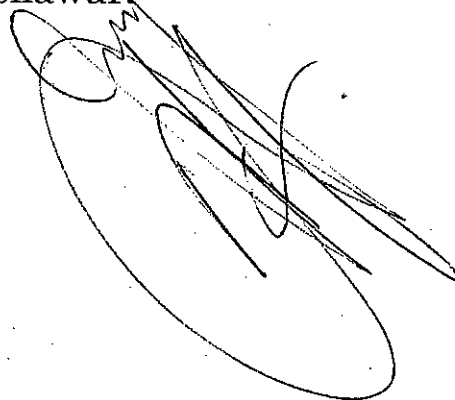
<i>S#</i>	<i>Description of Documents</i>	<i>Annexure</i>	<i>Pages</i>
1.	Rejoinder		1-4
2.	Affidavit.		5

Dated 28/01/2019

Petitioner

Through

Muhammad Rafiq Mohmand
&
Naveed Karim Khalil
Advocates, High Court
Peshawar



**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

S.A No. 905/2018

Dr Ali Gohar

Versus

Government of Khyber Pakhtunkhwa and others

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth
Preliminary Objection:-

All the preliminary objections raised by the Respondent are incorrect and raised with the intention to deprive the appellant from his due legal rights.

FACTS:-

1. That the appellant since his assuming charge of his duty as Medical Officer (M.O) at BHU Jhandha, District Swabi, he served the department with great zeal, sincerity and devotion. It is further to submit that during the entire period of stay (6 Years), he never remain absent from his duties and there is no objection whatsoever recorded against him.

2. That appellant transfer from BHU Jhandha to KTH Peshawar vide order dated 06/06/1998 and remain there up to 2004 as Registrar Surgical Ward, where the appellant performance remain up to the mark. During the entire service carrier his ACR(s) remained excellent and on the basis of those ACR(s) the appellant was promoted / selected as Registrar.
3. That the appellant applied for extra-ordinary leave without pay up to 5 years which was duly sanctioned and then extension up to 130 days was also endorsed as admitted by Respondents in their comments.
4. That the appellant after availing the EOL without pay submitted his joining report and in pursuance of that the appellant was transferred to DHQ Hospital Shangla and after that he was transferred to DHQ Hospital Mardan, where he remained as MO on the above mentioned place of duty.
5. That the appellant having earned leave to his credit, even applied for extra-ordinary leave for 5 years through an application dated 17/07/2009 which was sanctioned accordingly.

6. That all the Paras regarding his absence from duty are incorrect as the appellant was on leave duly endorsed by Respondents.
7. That the proceedings if any taken / initiated during the leave period of appellant is illegal, unjust and got no value in the eyes of law.

GROUNDS:-

A. Para 1 of the reply is incorrect as mentioned above, the appellant remained on leave (E.O.L) without pay till 17/07/2014, while the termination order was issued on 10/07/2014, which is illegal, unjust and incorrect on all counts.

B. In response of the remaining Paras, it is submitted that the appellant never remained on the address mentioned in the show-cause notice as well as termination orders.

C. That all the Paras taken by the respondents are incorrect and misconceiving that the appellant submitted proper applications whenever required.

D. That the appellant was never served with the show-cause notice and no personal hearing as required under law was

provided to the appellant. It is worth to be mentioned here that appellant was put more than 20 years service and has thus created legitimate expectancy in his favor and by doing so he is entitle for all pensionary benefits.

E. That the appellant has not committed any misconduct and imposing major penalty is harsh, unjust and needs to be reviewed.

It is, therefore, most humbly prayed that on acceptance of this rejoinder the comments filed by Respondents may be rejected and the appeal of the appellant may please be accepted and the appellant please may be reinstate in service keeping in view the overall circumstances & legal positions of the case.

Any other relief which this Hon'ble' Tribunal may deems fit and appropriate may also very graciously be granted in favor of the appellant.

Dated 28/01/2019

Petitioner

Through

Muhammad Rafiq Mohmand
&
Naveed Karim Khalil
Advocates, High Court
Peshawar

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

S.A No. 905/2018

Dr Ali Gohar

Versus

Government of Khyber Pakhtunkhwa and others

AFFIDAVIT

I, Dr. Ali Gohar S/o Badshah Khan R/o Sab Zai Apartment, 1st Floor, Warsak Road Peshawar, do hereby solemnly affirm and declare on oath that contents of the Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


DEPONENT

CNIC: 17321 7072706-1