

23.01.2019 Learned counsel for the appellant present and stated that on the same issue the appellant has also preferred another appeal No.1033/2018 without his knowledge. Adjournment requested. Adjourn. To come up alongwith service appeal No.1033/2018 on 25.01.2019 for further proceedings before S.B.

  
Member

25.1.2019

Syed Mudasir Pirzada, Advocate for appellant present.

In Appeal No. 1033/2018, already admitted for regular hearing on 24.08.2018, the representative of respondents submitted a copy of notification dated 30.08.2018, whereby the appellant has been transferred from PMO B.S 19 DHQ Hospital, KDA Kohat to Medical Superintendent Liaqat Memorial Hospital, Kohat.

In view of the development having taken-place in the interregnum and also the fact that this appeal impugned the order of transfer of appellant dated 25.04.2018 (impugned in appeal No. 1033/2018), the appeal in hand becomes infructuous and is disposed of as such.

  
Chairman

Announced:  
25.1.2019

24.09.2018

None present for the appellant. Case is adjourned to 30.10.2018 for preliminary hearing before the S.B.

  
Chairman

30.10.2018

Due to <sup>8.7.11</sup>retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 14.12.2018.

  
Reader

14.12.2018

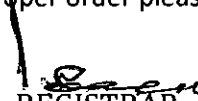



Neither appellant nor her counsel present therefore, notice be issued to appellant and her counsel for attendance and preliminary hearing for 23.01.2019 before S.B.

  
Muhammad Amin Khan Kundi  
Member

Form- A  
FORM OF ORDER SHEET

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

Case No. 987/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/08/2018	<p>The appeal of Dr. Gul-e-Rana presented today by Syed Mudassir Pirzad Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 10/8/18</p>
2-	11-8-2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15-8-2018</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
15.08.2018		<p>Syed Mudasir Pirzada, Advocate counsel for the appellant present: As lawyers community is on strike due to killing of an advocate at D.I.Khan. Case to come up for preliminary hearing on 28.08.2018 before S.B.</p> <p style="text-align: right;"> Chairman</p>
28.08.2018		<p>Counsel for the petitioner present and seeks adjournment. Adjourned. To come up for preliminary hearing on 24.09.2018 before S.B.</p> <p style="text-align: right;"> (Ahmad Hassan) Member</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal 987 / 2018.

Dr Gul- e- Rana w/o Syed Jamal Akbar R/o KDA Kohat.

(Appellant)

Versus

1:- The Secretary Health Govt of Khyber Pakhtunkhwa Peshawar.

2:-Director General Health Service KPK Peshawar.

3:-The Chief Minister through Secretary KPK Peshawar

4:-Dr Naseem Shah (MS LMH Kohat)

(Respondents)

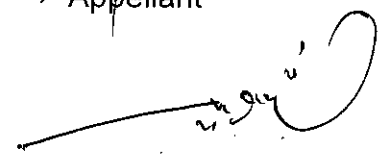
INDEX

S.No	Description of Documents	Annexure	Pages
1.	Memo of Appeal		1-5
2.	Affidavit		6
3.	Address of the Parties		7
4.	Copy of Impugned Order dated.	A	8
5.	Copy of Charge Report dated Transfer Order	B	9
6.	Copy of Departmental Representation	C	10
7.	Copy of Order of High Court & Notification dated 25-June-2018 along with press release.	D	11-15
8.	Waklat Nama		

Dated: 9/8/2018

  
Appellant

Through

  
Syed Mudasir Pirzada  
Advocate  
Cell 0345-9645854

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal 987 / 2018.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1266

Dr Gul-e-Rana w/o Syed Jamal Akbar R/o KDA Kohat.

Dated 10-8-2018

(Appellant)

Versus

1:- The Secretary Health Govt of Khyber Pakhtunkhwa Peshawar.

2:- Director General Health Service KPK Peshawar.

3:- The Chief Minister through <sup>Chief</sup> Secretary KPK Peshawar

4:- Dr Naseem Shah (MS LMH Kohat)

(Respondents)

APPEAL AGAINST THE IMPUGNED ORDER DATED 30-04-2018  
IN WHICH THE RESPONDENT ABOVE ILLEGALLY TRANSFERRED THE  
APPELLANT FROM LMH HOSPITAL KOHAT TO DHQ HOSPITAL ON  
NON-CADER POST & WITHOUT COMPLETING THE TENURE WHICH IS  
OF TWO YEARS FEELING AGGRAVED THE APPELLANT PREFER  
DEPARTMENTAL REPRESENTATION WHICH IS NOT ENTERTAINED NOR  
CONSIDERED AND VERBALLY INTIMATED THAT THE REPRESENTATION  
IS REJECTED.

Pray:

In the light of above circumstances it is respectfully prayed that on acceptance of instant service appeal Hon'ble Tribunal may direct respondents above to set aside all illegal or impugned orders and the Appellant may not be transferred from LMH Kohat to DHQ KDA Hospital and Appellant may be allowed to perform her duties as before. It is also prayed that during the pendency of service appeal, the operation of the impugned order dated 25-04-2018 may be graciously suspended till the final disposal of the appeal and blessed with any other remedy in the larger interest of justice.

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the Appellants on the following grounds:-

Filed to-day  
Registrar  
10/8/18

## FACTS

- 1:- That the Appellant file a service appeal against the impugned order dated 25-04-2016 vide Notification No-SOH(E-V)7-172/2017 in which for no reason as well as without any law full justification the Appellant has been transferred from LMH (Hospital Kohat) to DHQ Hospital Kohat as PMO on the basis of political influence (Copy of impugned order is annexed as annexure A)
  
- 2:- That the Appellant was serving as Medical Superintendent Women & Children Liaqat Memorial Hospital Kohat vide Notification No SOH(E-V4-20/2016 dated 29-12-2016 respectively (Copy Charge Report is annexed as annexure B).
  
- 3:-That the Appellant have not completed her post tenure and the respondent No-1 with the direction of respondent 3 illegally transfer the Appellant which clearly shows extreme political influence on the part of respondent No-3
  
- 4:-That the Appellant has been subjected to sever kind of discrimination as Appellant was performing her duties to entire satisfaction of their superior ups but when the Appellant did not obey the unlawful and unconstitutional orders of the political elite the Appellant was transferred.
  
- 5:-That Superior Court of this country has laid down principles that in case of stigma allegation or if a person become OSD he or she must given a fair opportunity of hearing to defend herself and mere provision of Article 212 regarding terms and condition of civil servant cannot become a stumbling block ,when the fundamental rights of an individual is infringed by the political elites for fulfillment of their unlawful acts,then the court can assume jurisdiction and protect the fundamental rights of every individual in the society, but in the case in hand this golden principle has been violated.
  
- 6:-That the Appellant politically victimized by the ruling elite of the province which is apparent from the photocopy of impugned order.

7:-That the illegal action of the respondent has also been condemned by the august Supreme Court of Pakistan in its judgment Syed Sikandar Ali Shah V/s Auditor General of Pakistan and others (2002 SCMR 1124) in which capricious and arbitrary direction of political bosses without raising the slightest protest by the competent Authority have been prohibited as the same depicts a cowardly and condemnable trend.

8:-That according to rules management cadre doctor should be posted/transfer on management post but the said rules have been violated by respondent No-3 with the consultation of respondent No-1 & 2



9:-That there is nothing on the record which transpires that the Appellant is involve in any subversive activity or any complaint against the Appellant

10:-That as per the order of Election Commission of Pakistan vide Election Act 2017 from the date of 1<sup>st</sup> April 2018 no transfer and postings are allowed in case of violation of the said orders the transfer/posting orders of respective employee of Provincial /Federal stands cancelled.

11:-That the Appellant have not completed her mandatory tenure period in Liaqat Memorial Hospital which of two year while the Appellant just spent one single year at the LMH Kohat.

12:-That the biasness and mala fide clearly proves from the impugned order of the respondent N0-1 and 3 by posting respondent No-4 on the post of Appellant on the basis of political influence i.e the respondent No-4 was serving in (Shakardar as MS category D hospital )

13:-That there is no bad entry in the service record of the Appellant and on the basis of good service and performance the Appellant is still in service .

14:-That the Appellant moved departmental representation against the impugned order dated 25-04-2018 but the said was not consider nor entertain :(Copy of application is annexed as annexure C)

15:-That the appellant before filing the instant service appeal prefer writ petition before PHC in which appropriate directions were issued to respondent for speedy disposal of representation but in vain(Copy of PHC annexed as annexure D)

16:-That the hasty of respondent is shown form the impugned order that the notification was drafted in 2017 and was served to the Appellant in 2018.

17:-That the Appellant is aggrieved from the illegal act of the respondents and having no alternate remedy except this Honorable , Court for speedy disposal / redressal for infringement of his rights through present this service appeal on the following amongst other grounds .

### **Grounds**

1:- That the illegal acts of the respondents No -1 is against to the cannon of law as well as against to the natural justice.

2:-That there is no legal cogent reason defined by respondent No-1 for which the present Appellant has been transferred without completing her tenure time period .

3:-That the impugned transfer order is against to the principal of natural justice and show the discrimination on the part of respondent No-1 .

4:-That the impugned order of the above respondent is illegal and highly condemnable and unlawful in nature .

5:-That the bias of the respondent No-1clearly shows by not entertaining the representation of the Appellant , keeping in view the decision of apex court the respondent No-1 & 3 were duty bound to record reason of rejection "when departmental appeal was submitted the competent authority was duty bound to decide same within reasonable time after application of independent mind ,by giving reason such was a requirement of law as well as of the principal of natural justice "2009 (PLC) (CS) 77.



6:- That the Appellant never ever remains absent from her duties till date.

7:- That the respondent No-1 again and again issue warnings to Appellant to relieve the charge other wise the Appellant should bear dire consequences.

8:- That it is clearly mention in 2003 PLC CS 1468 that any instruction issued in violation of Rules would be illegal and void.

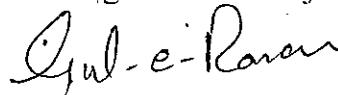
9:- That some other grounds will be agitated at the time of arguments with the permission of this Honorable court.

**Interim Relief:-**

It is humbly prayed that till the disposal of instant service appeal status quo may please be awarded against the respondent against the impugned order dated 25-04-2018 .

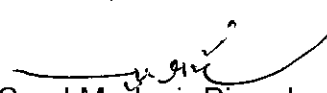
**PRAYER:-**

In the light of above circumstances it is respectfully prayed that on acceptance of instant service appeal the Hon bale tribunal may directed to respondents above to set a side all illegal or impugned order and the Appellant may not transferred from LMH Kohat to DHQ KDA Hospital and Appellant may allowed to perform her duties as before. it also prayed that during the pendency of appeal ,the operation of the impugned order dated 25-04-2018 may graciously be suspended till the final disposal of the Petition and blessed with any other remedy in the larger interest of justice.



Appellant

Through

  
Syed Mudasir Pirzada  
Advocate HC  
Cell 0345-9645854

**Certificate:-**

Certified that as per instruction received from my client this is the first writ petition on the subject matter ever moved before this Honorable Court.

  
ADVOCATE.

**LIST OF BOOKS**

Constitution of Islamic Republic of Pakistan 1973.

Any other Book according to need.

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

Service Appeal \_\_\_\_\_ / 2018.

Dr Gul- e- Rana w/o Syed Jamal Akbar R/o KDA Kohat.

(Appellant)

Versus

1:- The Secretary Health Govt of Khyber PakhtunKhaw Peshawar.

2:-Director General Health Service KPK Peshawar.

3:-The Chief Minster through Secretary KPK Peshawar

4:-Dr:Naseem Shah (MS LMH Kohat)

(Respondents)

**AFFIDAVIT**

I Doctor Gul-e-Rana W/o Syed Jamal Akbar Kohat do hereby solemnly affirm and declare that the contents of enclosed appeal are true and correct to the best of my knowledge and belief and nothing has been concealed there form



**Verification :-**

Verified on oath at Kohat that the contents of above affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed there from.

*Gul-e-Rana*  
Deponent

**Identified By:**

**Syed Mudasir Pirzada  
Advocate**

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

Service Appeal \_\_\_\_\_ / 2018.

Dr Gul- e- Rana w/o Syed Jamal Akbar R/o KDA Kohat.

(Appellant)

Versus

1:- The Secretary Health Govt of Khyber PakhtunKhaw Peshawar.

2:-Director General Health Service KPK Peshawar.

3:-The Chief Minster through Secretary KPK Peshawar

4:-Dr Naseem Shah (MS LMH Kohat)

(Respondents)

**ADDRESSES OF THE PARTIES**

**APPELLANT**

Dr Gul- e- Rana w/o Syed Jamal Akbar R/o Kohat Fase 2 House No 9 C/1 Kohat.


**RESPONDENTS:-**

1:- The Secretary Health Govt of Khyber PakhtunKhaw Peshawar.

2:-Director General Health Service KPK Peshawar.

3:-The Chief Minster through Secretary KPK Peshawar.

4:-Dr Naseem Shah (MS LMH Kohat)



Appellant

Through



Syed Mudasir Pirzada  
Advocate HC  
Cell 0345-9645854



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar, the 25<sup>th</sup> April, 2018

**NOTIFICATION.**

**NO.SOH(E-V)7-172/2017**

The competent authority (Chief Minister Khyber Pakhtunkhwa) is pleased to order postings/transfers of the following doctors with immediate effect in the public interest:-

S#	Name of Doctor	From	TO
1.	Dr.Gul-e-Rana Management BS-19 Cndro	Medical Superintendent Liaqat Memorial Hospital Kohat	DHQ Hospital KDA Kohat against the vacant post of PMO BS-19.
2.	Dr.Naeem Management BS-19 Shah Cndro	MS Hospital Shaker Darra Kohat	MS Liaqat Memorial Hospital Kohat vico S.No 01.

SECRETARY HEALTH  
Govt of Khyber Pakhtunkhwa.

Endst. No. & Date even.

Copy to :-

1. Accountant General Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. District Health Officer Kohat
4. MS DHQ Hospital KDA Kohat.
5. MS Liaqat Memorial Hospital Kohat.
6. MS Category-D Hospital Shaker Darra Kohat
7. District Accounts Officer Kohat.
8. PS to Minister Health Khyber Pakhtunkhwa
9. PS to Secretary Health Department
10. PS to Special Secretary Health Department.
11. Computer Programmer Health Department.
12. Doctors concerned.

*M. H. Syed*  
Syed Mudasir Pirzada  
Advocate  
District Courts Kohat

*[Signature]*  
SECTION OFFICER-V

WOMEN AND CHILDREN/LIAQAT MEMORIAL HOSPITAL KOHAT

CERTIFICATE OF TRANSFER OF CHARGE.

Certified that we the following Doctors have this day after / before noon taken / handed over the charge of this office of MEDICAL SUPERINTENDENT WOMEN & CHILDREN / LIAQAT MEMORIAL HOSPITAL KOHAT with reference to the Notification No. SOH (E-V) 4-20/2016 dated 29<sup>th</sup> November 2016.

Station: W&C/LMH KOHAT

Dated: 05<sup>TH</sup> DEC 2016

Signature of the Receiving Govt: Servant

Govt: Servant Gul-e-Rana  
Name: **DR. GUL E RANA**  
Designation: MEDICAL SUPERINTENDENT BPS-19

Signature of the Relived Govt: Servant

Govt: Servant \_\_\_\_\_  
Name: Syed Masood Pirzada  
Designation: Advocate  
**District Courts Kohat**

OFFICE OF THE MEDICAL SUPERINTENDENT  
WOMEN & CHILDREN/LM HOSPITAL KOHAT.

Endst: No. 4860-67 /PF/W&C/LMH Dated Kohat the 06 Dec, 2016

Copy forwarded to the:-

1. Secretary Health Govt of Khyber Pakhtunkhwa Peshawar
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner, Peshawar.
4. Chief Executive DHQ & W&C/LM Teaching Hospitals Kohat
5. District Health Officer Kohat
6. Medical Superintendent DHQ Teaching Hospital Kohat.
6. District Account Officer Kohat.
7. Personal file.

Gul-e-Rana  
MEDICAL SUPERINTENDENT  
WOMEN & CHILDREN HOSPITAL KOHAT

9  
14

W & C Hospital  
Kohat  
Dated: 30.04.2018

To

The Secretary Health  
Department of Health  
Khyber Pakhtunkhwa, Peshawar

**THROUGH PROPER CHANNEL**

Sub: **APPEAL AGAINST THE NOTIFICATION FOR POSTING & TRANSFER**

Sir,

Please refer to your Notification No: SPH (E-V) 7-172/2017, Dated: April 25, 2018 on the subject mentioned above.

It is to inform your good self that the subject notification of my transfer & posting is wrong and illegal based on the fact that:

1. I am senior member of the management cadre and as per rules and regulations I shall be posted & transfer anywhere on the management post only.
2. My transfer orders are premature as I have not completed my tenure (normal tenure 2 years) on the said post as evident from the fact that I joined this post Jan 5, 2017.
3. There is no complaint or irregularity reported against me.
4. The only reported inquiry during my period was political motivated and initiated by law Minister Mr. Imtiaz Qureshi which was directly conducted by law department and later informed health department; I was exonerated from all charges.
5. My transfer & posting is clear cut case of political victimization as mentioned earlier that the local MNA/Law Minister was aggrieved on having less share during class IV appointments during early 2017. Since then I have been victimized time to time and threats received verbally & through messenger but thanks to All Mighty Allah that all efforts against me were turned down & failed.
6. Last but not the least that I have never ever requested verbally or submitted any application to my department for my posting & transfer. Surprisingly through reliable source rumors spread in the department is that I (Dr. Gul e Rana MS W&C Hospital Kohat) have asked for her transfer, which is not only disappointing but shocking.
7. I therefore request your good self that I may please either retained on my existing post or may please transfer on the management post.

Attest  
by Syed Mudassar Pirzada  
Advocate  
District Courts Kohat

Gul-e-Rana  
Medical Superintendent  
W & C Hospital Kohat

Copy to:

1. PA to Director General Health Services Khyber Pakhtunkhwa Peshawar
2. Additional Director General HRM, DGHS Office, Khyber Pakhtunkhwa Peshawar

# PESHAWAR HIGH COURT, PESHAWAR

## FORM OF ORDER SHEET

Court of .....  
Case No. ....

Serial No. of Order of Proceedings	Date of Order of Proceedings	Order or other Proceedings with Signature of J.J.
	<p><b>ORDER</b> 30.05.2018</p>	<p><u>Writ Petition No. 2390-P/2018 with Interim Relief</u></p> <p>Present: Syed Mudasar Pirzada, Advocate, for Dr. Gul-e-Rana, petitioner</p> <p>*****</p> <p><b>SYED AFSAR SHAH, J.-Dr. Gul-e-Rana,</b> the petitioner, through instant constitutional petition, has asked for the issuance of an appropriate writ declaring that order dated 25.04.2018 of respondent No. 1, whereby she has been transferred from the post of Medical Superintendent, Liaqat Memorial Hospital, Kohat to the post of PMO in DHQ Hospital KDA, Kohat, being nullity in the eye of law, is of no effect whatsoever.</p> <p>2 The learned counsel appearing on behalf of the petitioner contended that when the respondents by transferring the petitioner repeatedly within a short span of time, have violated their own policy and their</p>

S

*Attested*  
 Syed Mudasar Pirzada  
 Advocate  
 District Courts Kohat

**ATTESTED**  
 CLERK  
 Peshawar High Court  
 21 JUN 2018

4. It is totally based on mala fide intention and not in the public interest or in the exercise of proper interference of this Court, in the peculiar facts and circumstances of the case, would be imperative and rather indispensable

3. We have gone through the available records carefully and considered the submissions made by the learned counsel for the petitioner

4. Admittedly, the controversy involved in the instant case is of posting and transfer, which in essence and in substance being related to the terms and conditions of service and in view of the judgments of the apex Court of Pakistan rendered in the case of Miss Rukhsana Ijaz vs. Secretary, Education, Punjab & others (1997 SCMR 167); Ayyaz Anjum vs. Government of Punjab, Housing and Physical Planning Department through Secretary and others (1997 SCMR 169); Rafique Ahmad Chaudhry vs. Ahmad Nawaz Malik & others (1997 SCMR 170); Secretary Education NWFP, Peshawar and 2 others vs. Mustamir Khan & another (2005 SCMR 17) and Peer Muhammad vs. Government of Baluchistan through Chief

*Attest*  
**Syed Mudasar Pirzada**  
 Advocate  
 District Courts Kohat



... of the Government of the Republic of Pakistan. The petitioners have submitted a petition lead down by the Hon'ble Supreme Court of Pakistan in number of cases mentioned above. The petitioners do not wish to embark upon such like matters.

For the reasons discussed above, the petition being without substance is dismissed. However, while parting with the judgment, we would like to direct the departmental authority viz. Secretary Health to decide the appeal of the petitioner, which is pending adjudication before him since 30.04.2018, one way or the other strictly in accordance with law through a speaking order as early as possible but not later than one month, after receipt of this order.

Announced,  
30.05.2018

*Rooh-ul-Amin Khan*  
JUDGE

*Affected*  
Syed Mudassir Pirzada  
by Advocate  
District Courts Kohat

*Afsar Shah*  
JUDGE

TO BE TRUE COPY

21 JUN 2018

Hon'ble Mr. Justice Rooh-ul-Amin Khan & Hon'ble Mr. Justice Syed Afsar Shah

TO BE SUBSTITUTE BEARING THE SAME NUMBER AND DATE.

GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT



14

Dated Peshawar the 25<sup>th</sup> June, 2018

**NOTIFICATION**

**NO.SOH(E-V)7-172/2017**

**WHEREAS** Dr.Gul-e-Rana Management Cadre BS-19 was transferred from the post of Medical Superintendent Liaquat Memorial Hospital Kohat after due approval of the competent authority (Chief Minister Khyber Pakhtunkhwa) under Schedule-III of the Rule of Business, 1985.

**AND WHEREAS** the said doctor submitted Writ Petition No.2390-P/2018 in the Peshawar High Court, Peshawar against this Department Notification dated 25.04 2018.

**AND WHEREAS** the honorable Peshawar High Court Peshawar in its judgment dated 30.05.2018 directed Secretary Health to decide the appeal of the Petitioner, one way or the other strictly in accordance with law through a speaking order as early as possible but not later than one month after receipt of the order dated 30.05 2018

**AND WHEREAS** Dr Gul-e-Rana Management Cadre BS-19 was awarded personal hearing on 25.06.2018 in the presence of Additional Secretary (Establishment) Health Department.

**AND WHEREAS**, from the record it transpired that during the same time, the Provincial Inspection Team submitted inquiry against her Titled "Inquiry into the appointment of Class-IV in Liaquat Memorial Hospital Kohat" with no charges to prove against her

**AND WHEREAS**, her tenure on the post effective dated 10.11.2016 till 25.04.2018 was Eighteen months which is less than the normal tenure.

**NOW THEREFORE** in view of the order of the Peshawar High Court Peshawar, her Departmental appeal merit consideration being based on merit. However, the Election Commission of Pakistan has imposed ban on posting/transfer and therefore, a summary will be moved to the Chief Minister Khyber Pakhtunkhwa, in lieu of the acceptance of appeal and for the posting back as Medical Superintendent Liaquat Memorial Hospital Kohat within the next three working days.

*Attest*  
**Syed Mudasar Pirzada**  
*by Counsel*  
**Advocate**  
**District Courts Kohat**

**Endst. No & Date Even.**

**SECRETARY HEALTH**  
**Govt of Khyber Pakhtunkhwa.**

Copy to the:-

1. Accountant General Khyber Pakhtunkhwa.
2. Registrar Peshawar High Court Peshawar with reference to the Writ Petition No.2390-P/2018 dated 30.05.2018.
3. Section Officer (Litigation-I) Health Department.
4. Director General Health Services, Khyber Pakhtunkhwa
5. PS to Secretary Health Department.
6. Officer/Doctor concerned.

**SECTION OFFICER (E-V)**

DAILY "MASHRIQ"  
DATED: 28/04/2018

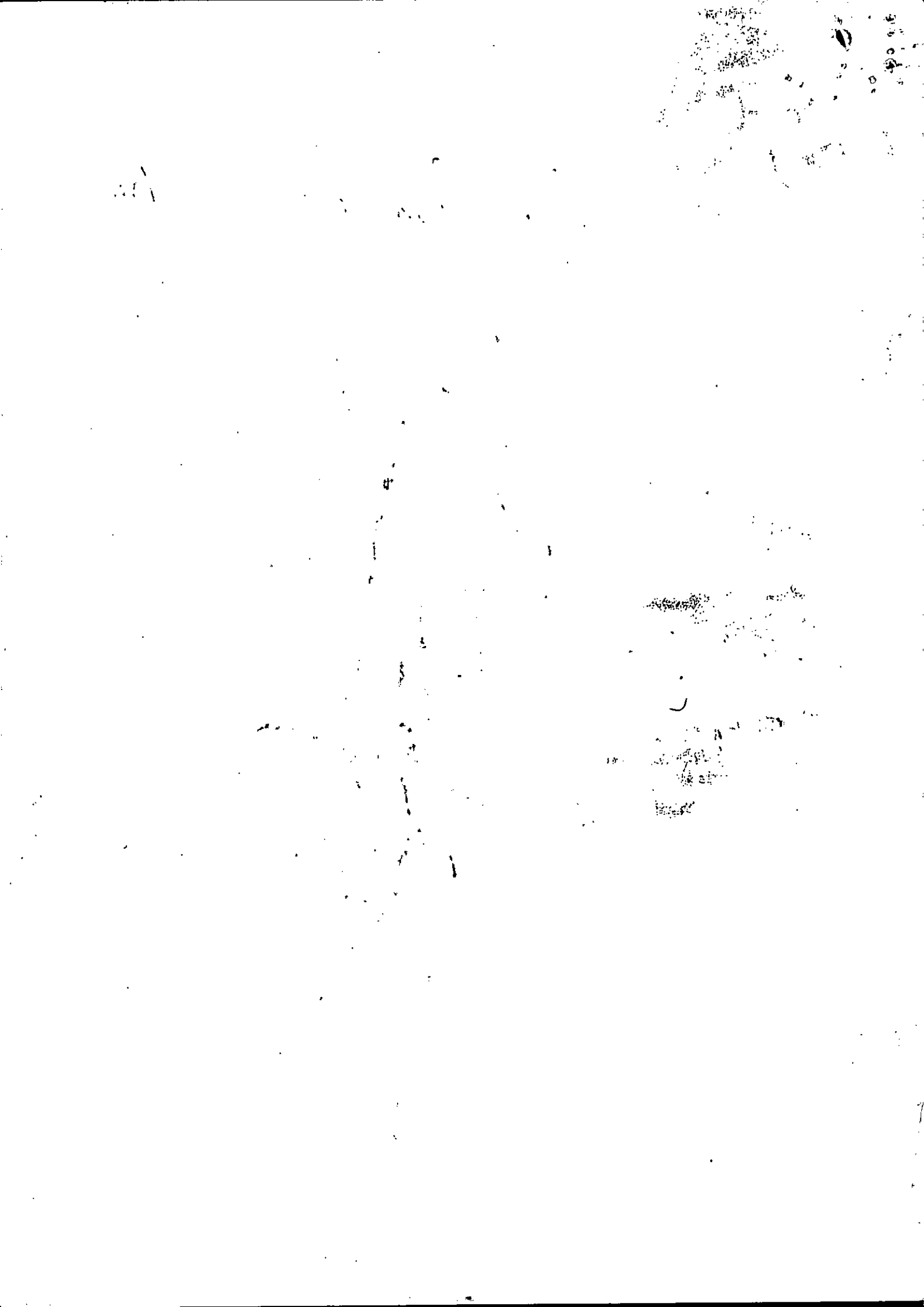
15

جانشین سید اختر حسین رضوی کی تقریری سے  
پتہ چلتا ہے کہ سید اختر حسین رضوی نے 2017ء کی آئی اے میں تمام  
حصوں میں سونے کے درجے میں امتیاز حاصل کیا ہے اور ان کے  
ساتھ ساتھ ہی ان کے گریجویٹ کیسے اور ان کے گریجویٹ کیسے

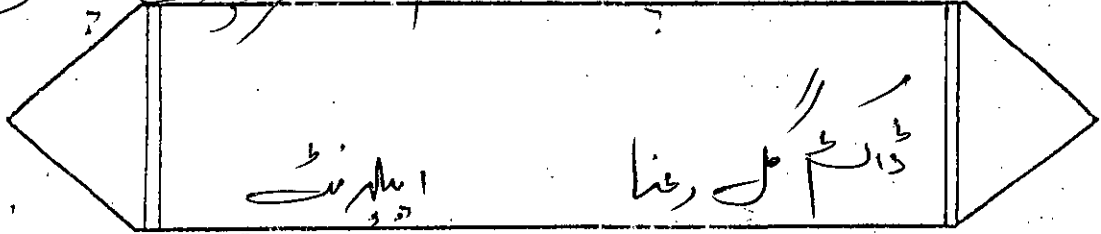
46

تقریری سے  
جانشین سید اختر حسین رضوی کی تقریری سے  
پتہ چلتا ہے کہ سید اختر حسین رضوی نے 2017ء کی آئی اے میں تمام  
حصوں میں سونے کے درجے میں امتیاز حاصل کیا ہے اور ان کے  
ساتھ ساتھ ہی ان کے گریجویٹ کیسے اور ان کے گریجویٹ کیسے

Attest d  
Syed Mudasir Pirzada  
by Advocate  
District Courts Kohat  
7



# بعدالت کے لئے اس کی منظوری کے لئے



2018ء منجانب ایڈیٹر منٹ

بنام

ڈاکٹر مل رعنا

ڈاکٹر اس

موزخہ  
مقدمہ  
دعوی  
جرم

مکمل شدہ  
وکیل

## باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
 آن مقام لٹا اور کیلئے مسدود شدہ اور لٹا اور  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کارروائی کے واسطے وکیل یا مختار قانونی کو اپنے ہمراہ لیا جائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی اپنی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

المرقوم 9 ماہ العتس 2018

واہ العب  
 کے لئے منظور ہے۔  
 accepted  
 Oppman  
 تحریر

بمقام لٹا اور  
 Gul-e-Raveer



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar, the 30<sup>th</sup> August, 2018

**NOTIFICATION.**

**NO.SOH(E-V)1-946/2014**

The competent authority (Chief Minister Khyber Pakhtunkhwa) is pleased to order postings/transfers of the following doctors with immediate effect in the public interest:-

S#	Name of Doctor	From	TO
1.	Dr.Gul-e-Rana Management Cadre BS-19	PMO BS-19 DHQ Hospital KDA Kohat.	Medical Superintendent Liaqat Memorial Hospital Kohat.
2.	Dr.Naeem Shah Management Cadre BS-19	Medical Superintendent Liaqat Memorial Hospital Kohat	Medical Superintendent Category-D Hospital Shaker Darra Kohat against the vacant post of BS-19.

SECRETARY HEALTH  
Govt of Khyber Pakhtunkhwa.

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

Copy to :-

1. Accountant General Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. District Health Officer Kohat
4. MS DHQ Hospital KDA Kohat.
5. MS Liaqat Memorial Hospital Kohat.
6. MS Category-D Hospital Shaker Darra Kohat
7. District Accounts Officer Kohat.
8. PS to Minister Health Khyber Pakhtunkhwa.
9. PS to Secretary Health Department
10. PS to Special Secretary Health Department.
11. Computer Programmer Health Department.
12. Doctors concerned.

  
SECTION OFFICER-V