


17.10.2018

Counsel for the appellant present. As the appellant was appointed as on contract basis and later on relieved due to non renewal of contract as is evident from the letter dated 23.12.2015 of Police Department provided by the learned counsel for the appellant. Learned counsel for the appellant when confronted on the point to produce any documentary evidence about his regularization of <sup>his</sup> appointment, invited attention to Khyber Pakhtunkhwa Employees (Regularization of Service) Act 2009, However, he was unable to produce regularization order issued by the respondents in pursuance of this Act. He sought adjournment to produce the relevant record on the next date. Case to come up for further proceedings on 30.11.2018 before S.B.

  
(Ahmad Hassan)  
Member

30.11.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Case called for several time again but none appeared on behalf of the appellant. Consequently the present service appeal is dismissed in default. No order as to costs. File be consigned to the record room.

  
(Muhammad Hamid Mughal)  
Member

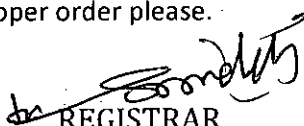

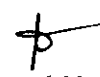


ANNOUNCED  
30.11.2018

Form- A  
FORM OF ORDER SHEET

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

Case No. 891/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/07/2018	<p>The appeal of Mr. Abdul Wahab resubmitted today by Mr. Zahid Gul 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</p>
2-	18-7-2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/8/2018</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
20.08.2018		<p>Counsel for the appellant present and requested for adjournment. Adjourned. To come up for preliminary hearing on 17.10.2018 before S.B.</p> <p style="text-align: right;"> (Ahmad Hassan) Member</p>

~~THE [KHYBER PAKHTUNKHWA] <sup>1</sup>~~  
**EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2009**  
~~( [KHYBER PAKHTUNKHWA] ACT NO. XVI OF 2009 )~~

CONTENTS

PREAMBLE

SECTIONS

1. Short title and commencement.
2. Definitions.
3. Regularization of services of certain employees.
4. Determination of seniority.
- 4A. Overriding effect.
5. Repeal.

---

<sup>1</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>2</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

**THE <sup>1</sup>[KHYBER PAKHTUNKHWA]  
EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2009.  
(<sup>2</sup>[KHYBER PAKHTUNKHWA] ACT NO. XVI OF 2009)**

*[First published after having received the assent of the Governor of the <sup>3</sup>[Khyber Pakhtunkhwa] in the Gazette of <sup>4</sup>[Khyber Pakhtunkhwa] (Extraordinary), dated the 24<sup>th</sup> October, 2009]*

**AN  
ACT**

*to provide for the regularization of the services of certain employees appointed on adhoc or contract basis.*

**WHEREAS** it is expedient to provide for the regularization of the services of certain employees appointed on adhoc or contract basis, in the public interest, for the purposes hereinafter appearing;

It is hereby enacted as follows:-

**1. Short title and commencement.**---(1) This Act may be called the <sup>5</sup>[Khyber Pakhtunkhwa] Employees (Regularization of Services) Act, 2009.

(2) It shall come into force at once.

**2. Definitions.**---(1) In this Act, unless the context otherwise requires,-

- (a) "Commission" means the <sup>6</sup>[Khyber Pakhtunkhwa] Public Service Commission;
- (aa) "contract appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment;
- (b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shift/night shift but does not include the employees for project post or appointed on work charge basis or who are paid out of contingencies;

<sup>1</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>2</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>3</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>4</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>5</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>6</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

- (c) "Government" means the Government of the <sup>1</sup>[Khyber Pakhtunkhwa];
- (d) "Government Department" means any department constituted under rule 3 of the <sup>2</sup>[Khyber Pakhtunkhwa] Government Rules of Business, 1985, and does not include any section of a Department or an organization which is federally funded;
- (e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants; and
- (f) "post" means a post under Government or in connection with the affairs of Government to be filled in on the recommendation of the Commission.

(2) The expressions "ad hoc or contract appointment" and "civil servant" shall have the same meanings as respectively assigned to them in the <sup>3</sup>[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (<sup>4</sup>[Khyber Pakhtunkhwa] Act No. XVIII of 1973).

**3. Regularization of services of certain employees.**---All employees including recommendees of the High Court appointed on contract or ad hoc basis and holding that post on 31<sup>st</sup> December, 2008, or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post:

Provided that the service promotion quota of all service cadres shall not be affected.

**4. Determination of seniority.**---(1) The employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

(2) The seniority interse of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

<sup>1</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>2</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>3</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>4</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

Provided that if the date of continuous officiation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

4A. **Overriding effect.**---Notwithstanding any thing to the contrary contained in any other law or rule for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.

5. **Repeal.**---The North-West Frontier Province Employees (Regularization of Services) Ordinance, 2009 (N.-W.F.P. Ordinance No. VII of 2009) is hereby repealed.

From: The Asstt: Inspector General of Police,  
Bomb Disposal Unit Special Branch,  
Khyber Pakhtunkhwa, Peshawar.

To: The Asstt: Inspector General of Police,  
Legal, KPK, Peshawar

No. 670 /BDU, Dated Peshawar the 23/ 12 /2015.

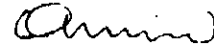
Subject: HRC NO. 21516-K/2015 8 8026

Memo:

Please refer to your office Memo: No. 1288/Legal dated 08-12-2015, on the subject cited above.

It is intimated that Abdul Wahab was appointment by CPO on 09-08-2008 as SI on contract basis for a period of 03 years including one year probation period. After the expiry of his contract period he did not apply for the renewal of it.

However, this office has no objection for his renewal of contract or any other service benefit provided he meets all others legal requirement in the light of rules and regulations besides SOPs in vogue.



(SHAFQAT MALIK)

Asstt: Inspector General of Police  
BDU, ATO, SB, KPK, Peshawar

No. /BDU, Dated Peshawar the / /2015.  
Copy of above is forwarded to I/C C.Cell vide his office letter No. 8037/C.Cell, dated 14-12-2015.

(SHAFQAT MALIK)


Asstt: Inspector General of Police  
BDU, ATO, SB, KPK, Peshawar

The appeal of Mr. Abdul Wahab Ex-SI Bomb Disposal Squad 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- Annexures-A and B of the appeal are illegible which may be replaced by legible/better one.
- 2- Copy of impugned order dated 6.8.2011 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of appointment order of the appellant as DSP mentioned in para-3 of the memo of appeal is not attached with the appeal which may be placed on it.
- 4- Copy of complaint mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 1385 /S.T,

Dt. 11/07 /2018.


  
REGISTRAR 11/7/18  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Zahid Gul Adv. Pesh.

Six,

1. Annexures A & B of the appeal are replaced by better ones.
2. Impugned order dated 6.8.2011 has not been handed over to appellant till now.
3. Approval order of DSP/BOS dated 21-7-2009 is placed on appeal.
4. Complaint is now attached with appeal.

Appellant Counsel

  
16-7-2018



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal 89/ /2018

Abdul Wahab

VERSUS

The inspector General of Police Khyber Pakhtunkhwa  
Peshawar etc

INDEX

S.no	Description	Annexure	Pages
1.	Service Appeal		1-5
	Condonation of delay		6-8
1.	copy of appointment letter dated 06/08/2008 and pension book	"A"	8-10
2.	Copy of appointment order DSP/BDU dated 21/07/2009	"B"	10
3.	copy of Complained HRC dated 11/01/2016	"C"	12
4.	Copy of Medical prescription	"D"	13-34
4.	Copy Departmental appeal dated 14/03/2015	"E"	35-37

Dated 10-2-2018

Appellant

Through

ZAHID GUL ADVOCATE HIGH COURT

PESHAWAR

Cell No 0301-8870932

Office Address: Near Labour Court Judicial Complex Peshawar

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Appeal No 891 2018

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1140

Dated 10-7-2018

Mr. Abdul Wahab EX-SI, Bomb Disposal Squad KP R/o Mohallah  
Kudi Ashah Baba Village changher Matti Tehsil and District  
Peshawar, Police Lines Peshawar.

Appellant

VERSUS

1. The inspector General of Police Khyber Pakhtunkhwa Peshawar
2. Assistant Inspector General of Police, BDU,ATO, SB, Khyber Pakhtunkhwa Peshawar.
3. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
4. CPO Khyber Pakhtunkhwa Peshawar .

Filed to-day

Respondents

Registrar

10/7/18

Re-submitted to-day  
and filed.

Registrar

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER  
DATED 06/08/2011 STILL NOT COMMUNICATED TO THE  
APPELLANT WHEREBY THE APPELLANT HAS BEEN  
DISMISSED FROM SERVICE AND DEPARTMENTAL APPEAL  
OF THE APPELLANT HAS NOT BEEN RESPONDENT TILL  
NOW

PRAYER

(2)

THAT ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED 06/08/2011 MAY VERY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE RE-INSTANT ON SERVICE WITH ALL BACK BENEFITS ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT THAT MAY ALSO BE AWARDED IN FAVOUR OF THE APPELLANT

Respectfully Sheweth.

1. That appellant was retired from Pakistan Air Force as associate Engineer in armament technology I (explosive quality inspector) on 30/01/2008 and after retirement appellant was appointed as sub-inspector for three years on contract basis vide CPO No 222US-55 dated 06/08/2008 In the respondent Department and right from appointment the appellant served the respondent Department quite efficiently and up to the entire satisfaction of his superiors. ( copy of pension book and appointment letter are attached as annex "A")
2. That during service of appellant, the Khyber Pakhtunkhwa employees (regularization of service) Act, 2009 came into force and verdicts of section 3 Regularization Of Service Of Certain Employees... All employees including recommenders of the High Court appointed on contract or adhoc basis and holding that post on 31th December, 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the

(3)

same qualification and experience for a regular post:.  
Provided that the service promotion quota of all  
service cadres shall not be affected, so appellant  
contact basis service according this law/Act shall be  
considered permanent but appellant was derived from  
his permanent post regarding to this law.

3. That during service, respondent department announced /advertised DSP/BDU permanent posts, appellant applied for them and section committee board selected appellant with six months good performance in police search operational areas, Appellant has excellent experience and well efficient for concerned post and appellant was appointment on merit as DSP/BDU on 21/07/2009 vide No 551-66 on 21/07/2009 in the respondent department.( Copy of appointment order DSP/BDU is attached as Annexure "B")
4. That appellant was transferred to Malakand region for six months' probation period and appellant successfully completed his probation in different areas.
5. That appellant submitted a complaint No. 2823 to HRC on 17/11/2015 and complainant was responded to appellant advising that appellant may seek appropriate legal remedy from the form/court on 11/01/2016.(copy of Complained is attached as Annexure "C")
6. That the appellant has got injury during performing on duties on 12/09/2009 after quick recovery from injury appellant again joined his duly but respondent department neither permanent his post nor appellant.

has promoted to DSP/BDU post appellant was dismissed verbally and till now no dismissed order has been handed over to appellant.(Medical Prescription is attached as annexure "D")

7. That felling aggrieved from the impugned order dated 06/08/2011 preferred departmental appeal dated 14/03/2015 before the respondent No 1 but the same has not been respondent till now( Departmental appeal is attached is annexure "E")
8. That appellant having no other remedy but to file the instant appeal on the following grounds amongst the others.

**GROUND:**

- A. That impugned order dated 06/08/2011 is against the law, facts and norms of natural justice hence not tenable and liable to be set aside.
- B. That appellant has not been treated by the respondent department according with law and rules in subject noted above and as such the respondents violated articles 4 and 25 of constitution of Islamic republic of Pakistan 1973.
- C. That no charge sheet and statement of allegation have been severed on the appellant before issuing the impugned order dated 06/08/2011.

(5)

D. That no show cause notice has been served on the appellant before issuing the impugned order dated 06/08/2011.

E. That no chance of personal hearing defense has been given on the appellant before issuing the impugned order dated 06/08/2011.


F. That no regular inquiry has been conducted in the matter which is necessary as per supreme court judgment before issuing in major punitive orders.


G. That appellant seeks permission to advance other grounds and proofs at the time of hearing

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated 20/07/2018

Through


Appellant 

ZAHID GUL   
ADVOCATE PESHAWAR

Affidavit

I, Mr. Abdul Wahab EX-SI, Bomb Disposal Squad KP R/o Mohallah Kudi Ashah Baba Village chancher Matti Tehsil and District Peshawar, Police Lines Peshawar, hereby solemnly affirm and declare on oath that the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.



18  
opponent  


(b)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

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

Abdul Wahab

VERSUS

*The inspector General of Police Khyber Pakhtunkhwa  
Peshawar etc*

**APPLICATION FOR CONDONATION OF DELAY, IF ANY IN FILLING  
THE INSTANT**

Respectfully Sheweth,

1. That the above mentioned Service Appeal is going to be filled before this Honourable court, wherein no date of hearing is yet fixed.
2. That the impugned order under adjudication is initially void, illegal unlawful and without jurisdiction, as per dictum of the superior courts, where the impugned orders on the face of it illegal and without jurisdiction, so no period of limitation would apply, at even the competent court can condone delay be exercising its power.
3. That the petitioner, Departmental appeal were not responded by respondents.
4. That the matter in question is required to be decided on its merits.

(7)

It is, therefore, most humbly prayed that as per dictum laid down by the superior Court 1991 SCMR 520, CLC 526 so many other case laws, the condonation of delay in filing of the Service Appeal may kindly be condoned in accordance with law.

Dated 07/07/2018

Appellant

Through

ZAHID GUL

ADVOCATE High Court

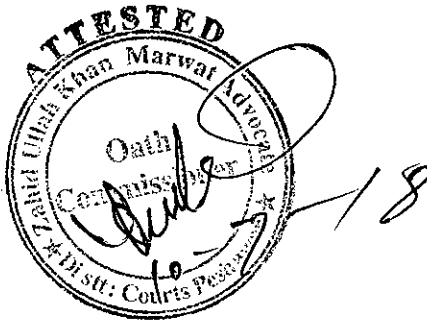
PESHAWAR

VERIFICATION

I, Mr. Abdul Wahab EX-SI, Bomb Disposal Squad KP R/o Mohallah Kudi Ashah Baba Village changher Matti Tehsil and District Peshawar, Police Lines Peshawar, do hereby solemnly affirm and declare on oath that the contents of this condonation of delay application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

Deponent

*[Signature]*





①

From : Provincial Police Officer,  
NWFP Peshawar.

To : Mr. ABDUL WAHAB  
viii, Askab Baba, Po. Chugamali  
Jalozai Distt, Peshawar


No. 17339 /I-I, dated Peshawar the 12-7 2009.

Subject: ENLISTMENT OF BDS STAFF

Memo: Reference your application No. NIL dated 16/8 2009.

The interview on the subject is scheduled to be held on 15<sup>th</sup> July 2009 at 10:00 hrs. at the office of Addl. IGP, Investigation NWFP at CPO, Peshawar.

Your requested to attend the interview on due date & time.

  
97  
DIG/HQRS.  
For Provincial Police Officer  
NWFP Peshawar.

(Khanam ATULLA KHAN)  
KPK Assembly

8

Annex 'A'

GOVERNMENT OF NWFP

Dated: 06/09/2008

NOTIFICATION NO. 22249

APPOINTMENT ORDER:- The competent authority on the recommendation of the Selection Committee is pleased to order the appointment of Mr. Abdul Wahab, Ex-Chief Technician, PAF r/o Village Ashab Baba, P.O Chaghar Matti, District Peshawar against the post of Sub-Inspector Bomb Disposal Squad (BS-14) purely on contract basis for a period of 03 years (including one year probation period) subject to Medical fitness and verification of character antecedents.

Their appointment will take effect from the date he actually report for duty.  
His terms & conditions will be settled lateron.

MALIK NAVID KHAN  
PROVINCIAL PORT OFFICER  
NWFP, PESHAWAR.

22249-56

Copy of above is forwarded for information and necessary action to

- 1. Addl: I/P/Investigation NWFP, Peshawar.
- 2. Accountant General NWFP, Peshawar.
- 3. Deputy Inspector General of Police, Special Branch NWFP, Peshawar.
- 4. Director/AIG BDS, NWFP, Peshawar.
- 5. Budget Officer CPO, Peshawar.
- 6. Accountant CPO, Peshawar.
- 7. Assistant Seceret CPO.
- 8. Mr. Abdul Wahab, Ex-Chief Technician, PAF r/o Village Ashab Baba, P.O Chaghar Matti, District Peshawar.

Attested  
MA

**BETTER COPY**

Dated 06/08/2000

**NOTIFICATION No.22249 APPOINTMENT ORDER:-**

The competent authority on the recommendation of the selection committee is pleased to order the appointment of Mr. Abdul Wahab, Ex, chief Technician PAF R/o Village Ashab Baba P.O Chaghar Matti, District Peshawar against the post of sub inspector Bomb Disposal Squad (BS-14) purely on contract basis for a period of 03 year including one year probation period subject to medical fitness and verification of character antecedent.


Their appointment will take effect from the date he actually report for duty.

His terms and conditions will be settled later on.

**MALIK NAVEED KHAN  
PROVINCIAL POLICE OFFICER  
NWFP PESHAWAR**

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

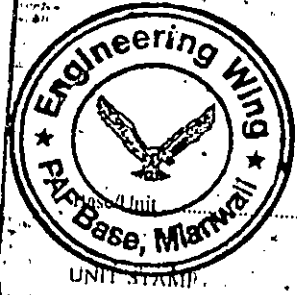
1. Additional IGP/Investigation NWFP Peshawar
2. Accountant General NWFP Peshawar.
3. Deputy inspector General of police Special Branch
4. Director/AIG BDS NWFP Peshawar
5. Budget Officer CPO Peshawar
6. Assistant secret CPO
7. Mr. Abdul Wahab, Ex, chief Technician PAF R/o Village Ashab Baba P.O Chaghar Matti, District Peshawar

Person & Alias	Monthly Rate (in figures & words)	Alia	Pd of Grant	Auth
<u>Family Pension</u>				
Dependant Pension	Widow of Pension Sanction w.c.f. 30/08/58	Rs 6027/-		
Widow	Widow of Pension Commuted for			
Mother	(see Payment of Rs 664/199/-)	Rs 2109/45		
Father	Retired Pension Payable w.c.f. 30/11/58	Rs 3917/55		
Children A/c	Authority ROP/22/854/661/Result/21/1/58			
Son	<del>Asst</del> <del>Asst</del>			
Daughter				
Signature	 RAMARIZ MAN Accounts Officer			
Signature	CAAF AHQ.			
Designation	Feshwar			
Dated	2-2-2008			

25. Any Additional Information and Type of Employment for which Recommended.

**SNCO HAS MERITORIOUS SERVICES AS AN ASSOCIATE ENGINEER IN ARMT TECHNOLOGY. HE CAN BE EMPLOYED ON ARMT SYSTEMS MAINT SUPERVISOR, INSTRUCTOR, QUALITY INSPECTOR & TECH. MANAGER IN ANY GOVT / SEMI GOVT AND CIVIL ORGANIZATION. SNCO POSSESS GOOD INSTRUCTIONAL TECHNIQUE & CAN SERVE AS AN INSTRUCTOR.**

Signature of Officer Commanding .....



(ABDUL SALEEM)  
 Group Captain  
 Retired Engineering Wing  
 PAF Base, Mianwall

*Amended*  
 [Signature]

A 40068 13

Payable at

GPO 2 Peshawar

HO 1239/F no TS

from (date)  
from  
from

This is to certify that \_\_\_\_\_ has been admitted to the Pension estb and is entitled to receive the pension and allice noted below:—

Pension and Allice	Monthly Rates (in fig and words)	Period of Grant	Auth
Retiring/Compensation Invalid/Disability Pension .....pm Pers allice as Sub/Ris Maj. Addl Pension JCO			
NH HJ SJ TJ & TK (MIL)	10% 2 391-76		For life  TRD
II & III S Br T Br	15% 2 646-40		

Residual Monthly Pension  
Rs: 3917/50 W.e.f 30/1/08

Temp increase payable/not payable in addition.

Amended  
BM

14

CI of pension Disability Nil

Serial No Peshawar/Pen/AD-21/08

Army No 854661 Rank CLT

Name Abdul Wahab

Regt/Corps of mil pensioner PAF

\_\_\_\_\_ or \_\_\_\_\_

Name of family pensioner \_\_\_\_\_

Relation of deceased \_\_\_\_\_

Rank, name and corps of deceased \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

“Name, relationship to the pensioner and full address of the person to whom arrears of pension are to be paid on the pensioner’s demise.”

Bibi Zaiba  
wife

(11) ORDER

(11) Annex B

As approved by the Selection Committee SI Abdul Wahab (on contract basis) of Bomb Disposal Squad Peshawar is hereby transferred/ posted to BDS Malakand Region with immediate effect and he will be kept under Special Report for a period of six months. After six months probation period subject to his efficient performance (Suitability Report) he will be absorbed as DSP BDS.

(Signature)  
**(SHAFQATULLAH MALIK)**

Asstt. Inspector General of Police,  
Special Branch, NWFP, Peshawar.

No

561-66

/BDU. Dated Peshawar the 21/07/09.  
Copy of above is forwarded for information to:

1. The Provincial Police Officer, NWFP Peshawar.
2. The Addl: Inspector General of Police, Special Branch NWFP Peshawar.
3. The Addl: Inspector General of Police, Investigation NWFP Peshawar.
4. The Dy: Inspector General of Police, Hqrs: NWFP Peshawar.
5. The Dy: Inspector General of Police, Malakand Region Swat.

Attest  
(Signature)

Sir,

112

## BETTER COPY

### ORDER

As approved by the selection committee SI Abdul Wahab ( On contract Basis) of Bomb Disposal Squad Peshawar is hereby transferred/posted to BDS Malakand Region with immediate effect and he will be kept under Special Report for a period of six months. After six months' probation period subject to his efficient performance (suitability report)

He will be absorbed as DSP BDS.

(SHAFQATULLAH MALIK)

Asstt: inspector general of  
police special branch, NWFP, peshawar

NO 561-66/BDU. Dated Peshawar the 21/07/2009

Copy of above is forwarded for information to:

1. The provincial Police Officer, NWFP Peshawar
2. The Addl: Inspector General of Police, Special Branch NWFP Peshawar.
3. The Addl: inspector General of Police, Investigation NWFP Peshawar.
4. The Dy: Inspector General of police , Hqrs: NWFP Peshawar.
5. The Dy: Inspector General of Police , Malakand Region Swat.

خدمت جناب عزت مآب چیف جسٹس مظہر عالم میاں قبل صاحب لٹاؤرنگی

Annex C جناب عالی!

عنوان :- درخواست برآمد نوکری کی مستقلی و ترقی کیلئے درسی و حصول النفاذ

مودبانہ گزارش ہے کہ فدوی ذاتی طور پر آپ کے شجاعت، بہادری، جرات، قابلیت، حب الوطنی، انسان دوستی، النفاذ پرستی، قومی جذبے، پیشہ ورانہ صلاحیتوں اور دلیرانہ فیصلوں سے بے حد متاثر ہے۔ اور آپ کے ارہم والدانہ و عہدہ دارانہ فیصلے اور حکم صادر فرمانے کیلئے درخواست گزار ہے۔

فدوی 21 مئی 2007ء کو پاکستان ایئر فورس سے ایسوسی ایٹ انجینئر ایم ڈیپوزٹ ایگزیٹ اور مانت یکنالوجی میں بحیثیت چیف یلینیشن ریٹائرڈ ہے۔ جس پر پختونخواہ پولیس کو درپیش دستبردگی کے سائل سے نمٹنے اور حل کیلئے فدوی کو CPD ٹرینیشن فرم 56-2249 مورم 2008ء کو بلوریم ڈیپوزٹ ایگزیٹ بحیثیت سب انسپکٹر تین سال کنٹریکٹ بنیاد پر منتخب کیا گیا۔

فدوی نے انتہائی نکل اور مہارت سے اب تک سیکنڈوں، IED، EOD، RCIED، و PBIED اور مختلف اقسام کے خود ساختہ بارودی مواد کو ناکارہ کرنے کیلئے دست بردگی کی دھمکیوں کے باوجود مختلف اپریٹوں میں اہم کردار اور عدالتی کارروائیوں کیلئے رائے دے چکا ہے۔ اور مسلسل ایئر فورس فورس (ATC) میں سپہا دوں کیلئے حاضر ہو رہا ہے۔ ان تمام مصروفیات کے علاوہ صوبے بھر کے تمام اضلاع سے مختلف تقاضوں کے نیٹروں جو انوں کو ایم ڈیپوزٹ کی تربیت بھی دے چکا ہے۔

جون 2009ء کو وزیراعظم پاکستان نے گریڈنگ تک تمام ملازمین کو مستقل کرنے کا اعلان فرمایا جس میں فدوی بھی مستحق تھا۔ کیونکہ فدوی نے تو ڈیٹس کا حاضر سروس ملازم تھا اور نہ ہی گریڈنگ سے باہر تھا۔ بلکہ 14-PBS میں بلوریم سب انسپکٹر ڈیوٹی سرانجام دے رہا تھا۔ ہندو ریات کو برائے کیلئے جو 21 مئی 2009ء میں BD ایم کو DSP کے عہدوں کیلئے درخواستیں مطلوب تھیں، جس میں فدوی سمیت کی

ریٹائرڈ ہو بیدار مہمان، کپتان مہمان اور میجر مہمانوں نے درخواستیں جمع کیں۔ اور ایئر لیشن IGP سپر کوارٹر جناب اکبر خان ہوتی مہمان کے زیر صدارت سیشن کیلئے نے صرف فدوی کو بہترین اعلیٰ معیار کی کارکردگی اور تعلیمی و پیشہ ورانہ قابلیت کو مد نظر رکھتے ہوئے BDU خالص نمبر 66-561 مورم 21-07-2009ء میں مدیر چھ مہینے ملائند ریجن میں کارکردگی کے بعد 2 جنوری 2010ء سے DSP کے عہدے پر ترقی کا فیصلہ کیا گیا۔

الست 2009ء میں ملائند سوات میں اپریشن ختم ہونے والا تھا۔ جبکہ لٹاؤر اور ارد گرد نواح میں حالات کافی سنگین، مشکل اور حساس ہو چکے تھے، جس کی وجہ سے فدوی کو ملائند کیلئے کا فیصلہ معلق کیا گیا اور لٹاؤر میں ذمہ داریاں سونپی گئی۔ اور فدوی انتہائی نکل، نہایت مہارت اور دلیری کے ساتھ لٹاؤر اور قریبی اضلاع میں ڈپوٹیاں سرانجام دیتا رہا۔ اور فدوی کو اپنے فرائض سرانجام دیتے ہوئے کی تکالیف، مشکلات اور حادثات کا سامنا ہوا۔

(برائے بہرمانی املا ورق ملاحظہ فرمائیں)



غذوی کو اپنے نرالوں سرانجام دیتے ہوئے کسی شکایت ، تکالیف اور عادات کا سامنا ہوا۔ اور مختلف اقسام کے کیمیکلز اور بارودی مواد پر کام کرنے کیوجہ اور موثر اثرات سے ( Acute peritonitis ) کے خطرناک سرجری کے بعد (Acute Hernia) کیلئے (Mash) لگانے کیلئے ( Full Abdomen Laparotomy ) جیسی سرجری بھی کر لی۔  
 پٹی - اور صحت یابی کے بعد اب تک غذوی کو نہ مستقل کیا گیا اور نہ ہی 21 جنوری 2015 سے DSP کا عہدہ ملا۔ حالانکہ غذوی مستحق تھا۔ غذوی کو جب الوطنی، بلوٹ خدمت، سخت محنت و مشقت، دست گردوں کی دھمکیوں کے باوجود بہترین کارکردگی اور وزیر اعظم پاکستان کے اعلان فرمانے کے بعد بھی مستقل نہ کیئے جانے پر سخت افسردگی، رنج و غم اور صدمہ ہوا۔  
 2013 میں حکومت بدلتے اور ایک کے بعد دیگر IGP صاحبان تبدیل ہوتے کیوجہ غذوی کے پاس آپ صاحبان کو زحمت اور قیمتی وقت دینے کے سوا کوئی راستہ باقی نہیں رہا۔  
 غذوی کو اب حاضر سروس ڈپٹی مڈل مین ملازم تصور کیا جا رہا ہے۔ جبکہ غذوی اعلان سے ڈھائی سال پہلے ریٹائر ہو چکے تھے۔

غذوی انتہائی لاجوار اور مجبور ہے۔ ورنہ کون صفر چند ہزار روپوں کے بڑے پورا مہینہ مختلف اقسام کے IEDs اور بارودی مواد کے پاس جاتا ہے۔

لہذا آپ صاحبان سے عاجزانہ التماس ہے۔ کہ غذوی کو وزیر اعظم پاکستان کے نوکریوں کی مستقلی کے اعلان کے مطابق یکم جولائی 2009 سے مستقل کرنے اور سبیلیشن کمیٹی کے انتخاب کے مطابق 21 جنوری 2015 سے DSP کے عہدے پر ترقی دینے کے ساتھ اب تک تمام واجب الادا بقایا جات خوری طور دینے کا حکم نامہ جاری فرما کر مشکور فرمائیں۔  
 غذوی تاحیات احسان مند رہے گا اور آپ صاحبان کے سلامتی، ترقی، خوشحالی اور دونوں جہانوں کی کامیابی و کامرانی کیلئے دعا گو رہے گا۔

عین نرازش ہوگی۔

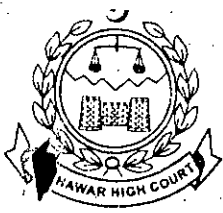
### الجارح

آپ صاحبان کا تاجر اور القای کا طلب کار

S. عبدالوہاب نجم ڈسپوزل سکورڈ، فیبر پختونخواہ پولیس ایسٹار

پتہ: حد کڑی اھی بابا، گاؤں جھڑی، تحصیل و ضلع پشاور

فون: 0314 9047695 یا 0333 9058274 المرقوم 9/2015



The  
**PESHAWAR HIGH COURT**  
Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 9210149-58  
Off: 9210135  
Fax: 9210170

www.peshawarhighcourt.gov.pk  
info@peshawarhighcourt.gov.pk  
phcpsh@gmail.com

No. 2823 /HRD

Dated Peshawar, the 17/11/15

From:

The Director-I  
Human Rights' Cell,  
Peshawar High Court,  
Peshawar

(12)

Annex C A

To

Mr. SI Abdul Wahab,  
Bomb Disposal Squad KP,  
R/O, Mohallah Kudi Ashab baba Village,  
Changhar Matti Tehsil & District Peshawar.  
Cell: 0333-9058274.

Subject: COMPLAINT (#HRC-8026)

Attested  
CA

Memo:

I am directed to refer to your complaint on the subject noted above, and to inform you that your request was gone through by the Competent Authority. You may seek appropriate legal remedy from the forum/court concerned, if so advised, please.

Ref No 8/HRC/CP

Director-I  
Human Rights Cell

11-1-2015

Annex D

CONFID

PAFM-131 S.

# MED CASE SHEET (13)

See Instr 52 of Regs for Med Svcs of Armed Forces Vol II-1978

Serial No in admission and disch book.....Hospital: CMH PESHAWAR CANTT

No 854661 Rank P/CIT Name Abdul Wahab  
 Unit 10 Arm Age 37yr Svc \_\_\_\_\_  
 Disease Ac Peritonitis (OP)

Date \_\_\_\_\_ Condition on Admission and Progress of Case  
 (Incl complaints, present, past-hist, family and personal hist, clinical exam, investigations and their results and the treatment prescribed, Progress report will be written as often as req)

12/9/68

op NOTES

Annex D<sup>2</sup>

op Exploratory laparotomy for Acute Peritonitis

Surgeon Brig Rizq  
 Lt Lt Azhar  
 MAJ Mahmood  
 Dir Owen

*[Handwritten signature]*

Anaestm GA by Brig Ehsan

### Findings

1. Trace pus / purulent fluid in the Abscess about 3L
2. Gangrenous Base of the appendix (fistula present in the Abscess)
3. Rest of the Abscess non

CONFID

Procedure

Midline Lapotomy

Pus drained out and sent for C/S

Appuductus done

Abdomen washed w/ 70 L of N/Saline (warm)

Haemostatic Sponges placed

wound loosely closed

Arm

Post op

- ✓ 1. Shift to main ITC.
- ✓ 2. NPO.
- ✓ 3. by Rungis Lactate 1000ml @ 300/ur.
- ✓ 4. by Nelson sup started to 10cc FD/W x 12h.
- ✓ 5. by TIEVEN 500mg IV x 8h.
- ✓ 6. by FLAYL 500mg IV x 8h.
- ✓ 7. by AMKEEN 500mg IV x 12h.
- ✓ 8. by ROSE 40mg Sm IV x 5D.

- ✓ 9. Blood Ck.
- ✓ Uric by R.
- ✓ C/LFT's
- ✓ Wound Care
- ✓ PT/PTK
- ✓ 6. Cx 2 Cx

Wagner

*[Signature]*

~~Stal~~

Pendent 8/2

2/9/9.

Anaesthesia

Surgeon under GA by Brig Ehsan, Maj Ali

Induction: Ketamine 50 mg

Propofol 100 mg

Coinduction: Nalbun 6 mg

Relaxant: ~~Atropine~~ Atrolex 50 mg

COTT 8.0 mm ID.

NIBP, pulse oximetry & cardiac monitoring

Maintained on Isoflurane, N<sub>2</sub>O & O<sub>2</sub>

Reversed with Neostig + Atropine

Recovery smooth & uneventful.

Adv. -

1. Shift to Medical TIC.
2. Keep prepped up.
3. O<sub>2</sub> inhalation @ 6 l/min

Atrolex  
Ehsan



Maj Ali Raza

(15)

Ad

4. Provisional Diagnosis, Investigations

1. NPO
2. List up for Emergency Laparotomy
3. Con cat
4. Surg to OT
5. Blood grouping and cross match

MAJ

Order  
Order

Admission

MAJ

12/18/09

5. Treatment

I am willing for my brother's operation

6. Disposal

under any kind of anesthesia

12/18/09

# SPECIALISTS REPORT

Reported by spec in\* \_\_\_\_\_

CMH / MH \_\_\_\_\_

Peshawar

Date: \_\_\_\_\_

No: \_\_\_\_\_

Rank Pt Col

Hecl

Name

ABDUL WAHAB

Age: 37 years

Unit: C/O HQ

Diagnosis: AC - Pancreatitis

12/9/09  
1. Complaints

Patient Referred by Brig R/A

H/O

Severe pain abdomen

Lo Myeloc

2. Hist of Onset

WNL

USG I Endoscopy

WNL

R/E

ill looking / dehydrated

Abdom

Distended

- Tenderness all over the

abdomen +ve

- Shifting dullness +ve

Fluid Aspiration  
for the L/E

3. Clinical Exam

pus like fluid sent for R/E and Angles

Plan

Exploratory

Laparoscopy

Diagnostic

\*Enter here the name of the specialty.

(16)

4. Provisional Diagnosis, Investigations / 11/11

12/11/11

Exam, treated for peritonitis

R/o Intest obstruction

- abd pain & distension persists

07/2

awake & appropial

BP: 110/70

afebrile

Tongue dry

Abd: distended

tenderness LHC

BS - sluggish

Chest: clear

*[Handwritten signature]*

5. Treatment

- NG aspirate 200 ml in bag clear

PLAN

6. Disposal

- IV fluids

- collect urine report

- P/B show to surg Dept

to R/o Int obstruction & peritonitis

- con R

Dr SHIRAZI  
185



# SPECIALISTS REPORT

Reported by spec in\* \_\_\_\_\_

CMH /MH \_\_\_\_\_

Date: \_\_\_\_\_

No: 3337078 Rank Lt/Col Name Amir

Age: 60 Unit: 6111

Diagnosis: \_\_\_\_\_

1. Complaints

Systemic

Chest NVB

CNS SITS-TO

CNS Well oriented in time, space & person

Abd Distended.  
Pain LHC + Generalized.

2. Hist of Onset

Guarding the

Rigidity the

BStne

Fender Specially LHC.

Ass:

Pancreatitis?

Ischemic.

3. Clinical Exam

Plan

- IV fluids
- Painkillers.

C.T

Dr. Amira Ali Badsha  
House Officer  
CMH, Peshawar

\*Enter here the name of the specialty.

4. Provisional Diagnosis, Investigations

(17)

12/9/09  
840hrs

H/O

• admitted with 1 day hx of left hypochondriac pain + vomiting on 5th Sep 2009.

Non diabetic  
Non HTN sure

• K/C of chest pain cls III  
SOB NY HA II  
IHD

06 yr  
since 2003  
dx in AFIC in 2007

Investigation:

C/O

Generalized abdominal pain

Ferrous  
Guarding  
Distention

PT 16/13  
PTTK 33/33  
DDimer 12000

5. Treatment

CT Scan Abd.

No Vomiting - since admission.

more abts

Progress

AKH

Endoscopy / Echo / NNL

The LHE pain has shifted to whole abdomen

Vomiting have stopped

Not able to take anything by mouth

Nauseatic

Trop T -ve

Adelax 5.4

PIC 1038.9th  
230 10th 11/S

B.P 110/75 mmHg

TLC 218

mylax 35

Pulse 100/min

Hb 8.1

ALT 59

Afebrile

PIT 226

RP 12 mg/dL

6. Disposal

Abd

I/O 2250/600 → 1650 true balance

Uterus

GPE A young man lying in bed with NG tube placed + Catheterized.

Jaundice the

Anemia the

Distended Abdomen

# SPECIALISTS REPORT

Reported by spec in\* \_\_\_\_\_

CMH /MH \_\_\_\_\_

Date: \_\_\_\_\_

No: \_\_\_\_\_ Rank \_\_\_\_\_ Name \_\_\_\_\_

Age: \_\_\_\_\_ Unit: \_\_\_\_\_

Diagnosis: \_\_\_\_\_

12/9/69  
1. Complaints

Severe  
Anxiety  
Not clearly  
Pericardial effusion  
Med. controlled by  
HOD. Surg. -  
Hod. later

2. Hist of Onset

C7. arched -  
=====

3. Clinical Exam

Handwritten signature and scribbles on the right side of the page.

\*Enter here the name of the specialty.

4. Provisional Diagnosis, Investigations

- 1/4 N. Saline 1000ml stat over 2hr
- new 2000ml over 22 hrs
- transfuse @ unit RBC
- Syp Gravimetric 1st & 2nd
- C.T. rest
- Post transfusion Hb


5. Treatment

- S. Urea, creat, s/elect
- UET?
- S. amylase / lipase / pty
- S. aldolase
- PT / INR
- S. albumin

Amish  
[Signature]

6. Disposal

- ECG
- urine R/E
- S. Ca<sup>+</sup>
- Bg R 8 hrs
- CXR
- ABG

  
 M. Adesh Singh  
 Resident in Medicine

14

PAFM-1276

# SPECIALISTS REPORT

Reported by spec in\* \_\_\_\_\_  
 CMH/MH \_\_\_\_\_  
 Date: \_\_\_\_\_  
 No: 832661 Rank: Pvt/Rec 4 Name: Ab. Wake S.  
 Age: 37 y Unit: CO AHC  
 Diagnosis: Ac. Pancreatitis

0820101  
12/9/9  
 1. Complaints - Suspected Pancreatitis  
 - unknown cause IHD  
 - admitted  
 - Acute Epigastric + DHC  
 - due for surgical review in O.T  
 - distended  
 - tenderness Epigastric + DHC  
 2. Lab  
WBC 11.8  
Hb 11.6  
Urine R/E RBC's +  
 albumin - +  
Usg abd - Ratty Dist  
Hist of Onset OIE  
D-dimer < 250  
PLT - 60  
amylase - 52  
CRP - 12  
CPK - 1038  
Endoscopy - NAD  
 3. Clinical Exam  
CT abd - Pancreatitis cRest B.V.B  
Spec - NAD  
HbSAg - v  
antiHCV - v  
CPK - no focal def  
Yarrowchromia  
Patter  
Jaundice  
SI \_\_\_\_\_ S2 no added con

\*Enter here the name of the specialty.

Swampy ...  
Patient ...

1/10/02

2355  
Provisional Diagnosis, Investigations

Supposedly ... (20)

MC faint diary

Pulse 82/min  
O2 = 86%

Bp 100/70  
Methadone

Ad dilution  
BS ...

5. Treatment

Chol. ...  
P/R = Reten Empty

CT Scan  
Pancreatic

Aspirin ...  
Send to R.E.

Please bring ...

Send ...

Ad @ ...  
Stat ...

- 3. ...
- 4. Blood CP with lactate
- 5. S. Amylase
- 6. Grouping Cross match -  
before one unit of RCC.

6. Disposal

Send Aspirin for R.E. (urgent)

- 7. Coagulable profile
- 8. Urine D-Dimer
- 9. plac ...



# SPECIALISTS REPORT

Reported by spec in\* \_\_\_\_\_

CMI/MI \_\_\_\_\_

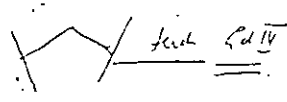
Date: 11/09/08

No: 254661 Rank: P/Chief Tech Name: AB WALKER

Age: 37 yrs Unit: C/O RATIO PCP

Diagnosis: Ac Pancreatitis

1. Complaints 11/7 Pancreatitis ACS



✓ VIL ✓ shift to m. i. r. c.  
✓ NPO  
Pan 4/5 tabs

2. Hist of Onset

✓ 10 TIENAM (500) 1/4  
✓ 3 800 mg  
✓ 3 100 MAUBIN (100) 1/4 discontinued  
✓ 1/4 200 mg  
✓ 1/4 1000 ROBIC (100) 1/1000 x 80  
✓ 100 200 mg 1/4  
then 100 mg 1/4 infusion

✓ Hct  
✓ CRP  
✓ LOH level  
3. Clinical Exam  
✓ Tenderness/abd  
✓ Unrelieved  
✓ LFT

unrel.

\*Enter here the name of the specialty.

11/2  
Abd. pain + + + /  
e/o B.P. /  
Chs  
1-1

22

① Shift to Ac Meand

② Show to Gastroenterologist

③ 1/2 D/W 1000 2 20 up

C.T. Abdomen & contrast

④ 1/3 ARTIFEN 250

⑤ 1/3 2A 1000 100

Attest  
[Signature]

Lt Col  
Dr. Umar Zafar Ali  
Cl. Med. Spec. Neurologist  
CMH, Peshawar

11-09-09  
1830 hr. e/o Abdominal pain

C.T. Abdomen — Findings are

Suggestive of Pancreatitis  
SUSPENSE ABIMR

Adv. 1/2 Diclovan 1/2m stat

Tab. Artifen 500mg

XRD  
C.T.  
DRAZIL RAZIM  
Post-Graduate Resident (Med)  
CMH, Peshawar



DR. OMAR KHATTAK  
 MBS (Gold Medalist)  
 FCP(S) Medicine/Gastro  
 Resident Physician

~~Dr. Omar Taseem  
 M.D. Spec. Neurologist  
 M.H. Peshawar~~

10.6.09  
 Adv by Col. Amjad Salam  
 Hypert. (urgent)  
 ECG  
 CK-MB (urgent)

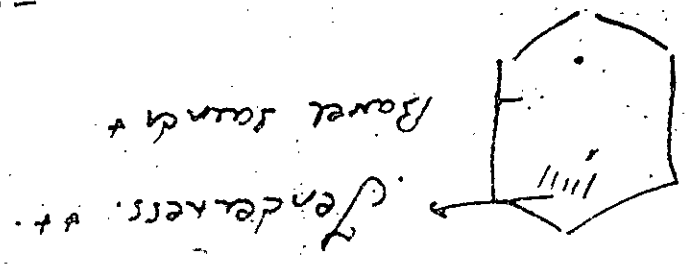
Amjad Salam  
 Col. M.D. Sp. Gastroenterologist  
 M.H. Peshawar

Domnam onylane  
 200mg  
 urgent  
 Monday  
 200mg  
 10mg  
 200mg

Amjad Salam

- TLC  
 - WBC  
 - RBC  
 - MU

advised



HTN +  
 Epn pain  
 vomiting  
 Abd. distension  
 5 days

(3)

~~Col. Amjad Salam~~

9-9-09  
 Case seen by  
 Dr. P. Ch. T. D. B. M. H. S.  
 482375  
 482375

CONFID

# MED CASE SHEET

24

See Instr 52 of Regs for Med Svcs of Armed Forces Vol II-1978

Serial No in admission and disch book.....Hospital: CMH PESHAWAR CANTT

No 854661 Rank P/CTI Name Adel Wahab

Unit AAQ Age \_\_\_\_\_ Svc \_\_\_\_\_

Disease CPBA sub cell fluid

Date \_\_\_\_\_  
Condition on Admission and Progress of Case  
(Incl complaints, present, past hist, family and personal hist, clinical exam, investigations and their results and the treatment prescribed, Progress report will be written as often as req)

مرجیل اور بی بی ڈی ۱۸  
تاریخ ۱۸  
۱۸/۱۰/۱۰

AR  
Cap. Nexom  
4000

Sy Llac  
275A gm

AHSTC

Azhar Iqbal  
Classified Surgical Specialist  
CMH Peshawar

CTX 03 months

۱۹  
۲۹/۱۱/۲۰۱۰  
issued

CTX 02 wks

MEDICINE  
29 NOV 2010  
62  
PSC

LPCOE  
MUHAMMAD IMTIAZ KHAN  
CLASSIFIED  
CMH PESHAWAR

CONFID

II  
26-4-11  
دین

Unilateral  
hernia of

(2)

Also:-

1. ~~Cap~~ Risek 20  
1 x 0.0

2. ~~Test~~ Nospa  
1 x 0.0

3. ~~Dis~~ Nospa  
1 x 0.0

AMH  
CP

Dr. Arslan Sharif  
Classified Surgical Dept

ON

CT x 04 months  
ISSUED CT x 02 WKS

03.6.11  
33

03 JUN 2011  
CUM

Handwritten signature

# SPECIALISTS REPORT

26

Unit No

Reported by spec in\*

CMH/MH

Date:

No: 854661

Rank

CHT

Name

Abdul wahab

Age: 38yr

Unit:

AKO

Diagnosis:

22/11/10

1. Complaints

Pain peritendin due to A. prolid

2. Hist of Onset

need evaluation of Subac  
Ba mal 9 fullis (myo)  
Ba Eureka

3. Clinical Exam

Maspa HHT  
Marboul Lal HHT  
Cap Ruvik 2009  
Lal mu

\*Enter here the name of the specialty.

Detail by P 12/10

Provisional Diagnosis Investigations

10/7/10  
27/7/10  
88  
دن ۲۷  
کلاس ۱۰  
کلاس ۱۰

Provisional Diagnosis Investigations

(1) Asa Buit (27)

(2)

Cap. Kisch - 2010

5. Treatment

Neospa

(3)

Asa Kuit = 2 x 0.4 each  
23 AUG 01  
Carl Jahn

6. Disposal  
05 JUL 2010

16/8/10

کلاس ۱۰  
کلاس ۱۰

CT for make

COY. M. JAVPD  
MIRG. CIV. MIRC. SPEC  
CNS. M. JAVPD

Handwritten signature

# CASE SHEET

28

Reg for Med Svcs of Armed Forces Vol II-1978)

Hosp CMH PESHAWAR CANTT

Serial No. in admission and disch book

No 854661

Rank Pvt

Name AB. Dul Wahab

Unit Co. AB

Age \_\_\_\_\_

Svc \_\_\_\_\_

Disease \_\_\_\_\_

Condition on Admission and Progress of Case

(Incl complaints, present, past hist, family and personal hist, clinical exam investigation and their results and the treatment prescribed. Progress report will be written as often as req).

Date

Ad scar healed well

31/10/11  
20

03 OCT 2011  
FOR

Ad

Attested  
AB

Cap Nexum 40mg  
1 x OD

Syp Ulsamic  
1 2b5FX7D1

Tab Diagenic  
2 x 2 x 2

LFT

Urea/Creat/Elect

02  
wa

LT COL DR  
MUHAMMAD IMTIAZ KHAN  
MBBS, FCPS, FICS  
CLASSIFIED GENERAL &  
THORACIC SURGEON  
CMH, PESHAWAR

**CONFID**

17.11.11

188

6

MRS. ANWAR KHAN  
SPECIALIST  
CMH PSC

103 NOV 2011  
FOR 02 WKS  
CMH PSC

16/11/11 ISSUED x 02 WKS  
01/12/11 ——— 02 WKS  
17/12/11 x 02 WKS  
02/01/2012 ISSUED x 02 WKS  
17/01/2012 ——— 02 WKS

6-2-12

CT x 04 WKS

Maj. SAQIB-UR-REHMAN  
Resident Surgeon  
CMH Peshawar

06 FEB 2012

19-2-2012 ISSUED x 02 WKS PAF

3. opd. (19)

05-03-2012 CT x 04 WKS

CT x 03 weeks  
for DAF

Maj. Muhammad Nauman Iqbal  
Resident Surgeon

05 MAR 2012

20/3/12 ISSUED for one month  
18/4/12 ——— of month  
16/5/12 ISSUED for 02 WKS

HOSPITAL PESHAWAR CANTT  
Notes and Fol Up Proforma

30

Tel No. \_\_\_\_\_

Dept: \_\_\_\_\_

Attending Spec: \_\_\_\_\_

Dated: 27/03/2012

Name of Patient: \_\_\_\_\_

Issued for 02 weeks

Address/Unit: \_\_\_\_\_

Short History and Progress: \_\_\_\_\_

Unit  
CMH PSC

Maj  
SAQIB UR-REHMAN  
Resident Surgeon  
CMH Peshawar

20/6/12 Issued for 04 wks. →

Important Positive Findings:

18/7/12

01 month 2-

15/8/12 Issued for 02 wks RZ

Important Investigations:  
[Handwritten notes and signatures]

[Signature]  
FAHAD GUL  
AMC

03 months  
02 weeks  
L.P. MEDICINE  
MORNING  
05 SEP 2012  
FOR 02

Treatment given in Hospl: (Incl op done)

[Handwritten signature]

Unit  
CMH, Peshawar



HOSPITAL DISCH SLIP

3000D  
B.No. 8

(3)

To: CO

(Patients Unit)

No. 354661 Rank P/C/7 Name Abdul Wahab

Of your unit was admitted in CMH Peshawar Cantt on 23-04-2011

and was disch on 28-05-2011

Disease while in hospital was Incisional Hernia 30x30cm (ops)

At Ac. peritonitis post surgery

Sick leave for 08 weeks

RTH

Which was not beyond his/her con. yes, usil

Date: 28-05-2011

Signature

[Signature]  
CMH Peshawar  
(MO I/C case)

COUNTERSIGNED

Dated 28-05-2011

[Signature]  
CO Hosp

- 1- BG
- 2- BSKPR
- 3- LPTS
- 4- SUCE
- 1- Lab. ...
- 2- Cap. ...
- 3- Lab. ...
- 4- ...

MS/ Civil Surgeon in hospital.

A case of post oculoacute peritonitis  
middle age pt now suffering from big incisional  
hernia. Pl grant this pt rest as per role.  
post ops above the umbilicus.

DR. NAHEEM MUMTAZ  
(F.C.P.S.)  
Assistant Professor  
Surgical C. Unit  
PGMI, LRH, Peshawar

1/24 Nabha 10-8  
12505

(32)

1/24 Augmentin 1 gm  
1-1-1 11m


1/24 Flagyl 500 mg 10da

1-1-1 11v

1/24 Ibuprofen forte  
1x 0D

1/24 Diclofenac 25 mg  
1-1-1-1

D. post 12/10/2005

  
M O/C  
JCO Ward  
GMA Peshawar

Attended  
(M)

10/16/24

Leading Hospital

Peshawar  
Accident & Emergency  
Department

Case No:

Name:

Date:

OPD:

33

فری ایبدر لیس سروں کیلئے 137 پرکال کریں -  
Peritonitis

MD

GBAs

Oral Fenac

1/M stat

Tab Panadol

141.1. Alp  
Oral Dicloran 1/m

Attest

~~Tab Pentafen (02)~~

1/m Pentafen (02)

[Signature]

... Hospital  
Peshawar

Room 12  
Date: 06-AUG-20 10:45:00

REG 1870910  
ABOUL WAHAZ

OPD  
- SURGICAL (MALE)

Ref to ...  
45

35

Existing Home

Prog. lap.

①  
P Fibroid 6x4x3  
Sxht 1 x 1

② Lab. Hb 14.0  
WBC 13500

③ Lab. Hb 14.0  
WBC 13500

پروفیسر ڈاکٹر سجاد محمد خان (سرجن)  
انجمن سرجنوں میں  
ادویاتی - پروفیسر

Ref to Seven  
Jasp

cc # 07/08/2010

To

18-2

The Inspector General of Police C.P.O. Khyber Pakhtoonkhwa

Sir,

(35)

Annex E

Subject: APPLICATION FOR APPOINTMENT ORDER

With due respect and regard, I have to write few lines for your kind, favourable and sympathetic consideration.

I retired from Pakistan Air Force as Associate Engineer in Armament Technology (Explosive quality inspector) on 30-01-2008 and after retirement, I was appointed as sub Inspector for three years on contract basis vide CPO No 22249-SS dated 06-08-08.

As per Annexure A-2, and A-3, CPO invited for a DSP/BDU permanent post. Several retired Majors, Captains and Jcos along with me submitted applications for said post.

A selection board consist of Mr. Sifat Ghayoor Sahib (may his soul rest and peace), Mr. Dr. Suleman Sahib and AIG Bomb disposal Mr. Shafiqatullah Malik under chairmanship of I.G. Head Quarter Mr. Akbar Khan Hooti Sahib, selected me with 06 months good performance in Army and police search operational Areas in previous post. ~~AMK~~

They selected me due to my meritorious, <sup>AM</sup> gallantry with experienced and excellent job for police department in 2008 and 2009. Besides these performances I have DAE in concerned field with MA degree holder.

I was transferred to Maleskand region for 06 months probation period and I successfully completed my probation period in different Areas with optimum output to police dept.

As per decision of selection board I would be observed as DSP/BDU with effect from 21-01-2010 vide order No 561-66 dated 21-7-2009. But in 2010 BDU was shifted to special branch from CPO. Therefore I

(Please see page 2)

36

approached SB Establishment for issue of order, but I was told that cpo will issue said order, then I reached to cpo Establishment where I was returned back to SB by saying, it is your right but due to shifting SB, will issue said order, and I repeated again and again but no one gave me justification.

Due to side effects of different kinds of explosives and chemicals and said Tension, I became seriously ill in 2010, and admitted in CMH Peshawar, by diagnosing it was Acute peritonitis, and poison of perforated appendix spread to all parts of my abdomen. Therefore very serious, killer and dangerous Leporatory surgery was carried out.

After few months all mighty Allah gave me health and I again join my job. But due to very tough and full of contingencies duty, my scare of leporatory surgery started flud of pus cells and converted into Large Incienal Hernia and once again a serious surgery for said disease was carried out by ITC CMH Peshawar. and filled a mash of 30x30 cm in my abdomen permanently. and I became healthy after 03 months.

Unfortunately in August 2011, I was under treatment Establishment of SB cancell my already propounded appointment order 22249-55 dated 06-08-08. That order was revised vide notification 561-66 dated 21-07-2009.

However after complete fitness, I approached to many police officials and different courts. All of them are agreed with me and have No objection on my appointment order. in the best intrustrust of public services. AS PER direction of senior officials I replied through HRC 21516-K/2015 Supreme court.

Now complete necessary documents, correspondences necessary comments are ready with AIG/Legal in a/m HRC file. and awaiting your kind and symphetic order. all Legal process is completed.

(Please see page 3.

Cancellation of already proponded appoint order is totly a clerical mistak, error and misunderstanding and I suffered severly, because my posting in any operational Area order was issued to me from special branch for 06 months as probation before my promotion to DSP/BDU. and reference is SB notification 561-66 dated 21 July 2009.

It is therefore requested that my necessary action may please be taken, and I may please be issued DSP/BD permanent appointment order.

I shall be very much oblidge and thank full for your kind, feavourable and symphetic consideration. I will always be Prayed for your good wishes, health, succes and happy long life throughout my life.

with great regards.

Dated: 14-03-2015

*AW*

Yours obediently,

ABDUL WAHAB S/o AUA Mohamamad (late) BDU/SB

Add: Mohallah: - Kudi Ashab baba, Chaghar mali  
Teh & Dist: Peshawar.

cell phone :- 03339058274

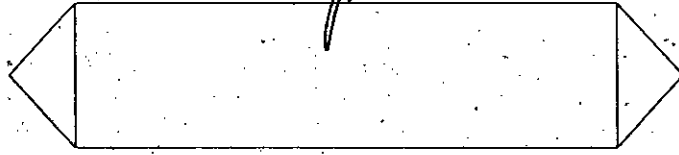
10749/PSO

→  
Alb/Legal-11406/

14-03-16



# بعدالت Service Tribunal 1972



2018ء منجانب

بنام

عبدالوہاب

Service Appeal

مورخہ

مقدمہ

دعویٰ

جرم

۱۶۸

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ آن مقام ٹیما مد کیلئے فراہم کی گئی ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز 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 ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ از عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری نیک طرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ 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 لکھد یا کہ سندر ہے۔

2018

ماہ جولائی

المرقوم

العبد گواہ العبد

کے لئے منظور ہے۔

ٹیما مد

مقام

Appellant

عبدالوہاب راجہ عطا محمد سندھ جنرل ٹیما مد