


25.05.2022


Learned counsel for the appellant present and requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing on 07.07.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

7<sup>th</sup> July, 2022

Clerk of learned counsel for the appellant present.

Counsel are on strike. To come up for preliminary hearing on 07.09.2022 before S.B.




  
(Kalim Arshad Khan)  
Chairman

Form- A

## FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 54/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/01/2022	<p>The appeal of Mr. Arif Ullah resubmitted today by Mr. Mansoor Salam 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-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>28/02/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	28.02.2022	<p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.</p> <p style="text-align: right;"> Reader</p>

*Arifullah*

The appeal of Mr. ~~Fahim Khan S/O Habib Ullah Khan~~, R/O Village Begu Khel, Tehsil and District lakki Marwat received today i.e. on 06.01.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Memorandum of the appeal may be got signed by the appellant.
2. Annexure B attached with the appeal is illegible which may be replaced by legible/better one.
3. Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.

No. 37 /S.T,

Dt. 07/01 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Mansoor Salam Adv. Pesh.

*Sir*

*Re-Submitted of this*

*Mansoor*

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Service Appeal No. 54/2022

Arif Ullah

V/S

IG Prison Police KPK

**INDEX**

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Through:

Appellant



Mansoor Salam

Advocate, High Court

Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_/2022

Arif Ullah Ex-Warder (BPS-07), Moh; Khuaidad Khel, District Lakki Marwat.

(Appellant)

VERSUS

1. Inspector General of Prison Khyber Pakhtunkhwa, Peshawar.
2. Superintendent Circle HQs Prison D.I.Khan, KPK, Peshawar.

(Respondents)

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OFFICE ORDER NO.28296/P DATED 02.09.2021 OF THE OFFICE OF INSPECTOR GENERAL PRISON KPK, WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE IN UTTER VOILATION OF LAW AND AGAINST THE IMPUNGED OFFICE ORDER NO 1953-56/ DATED 26.05.2021 WHEREBY THE DEPARTMENT APPEAL OF THE APPELLANT HAS BEEN TURN DOWN FOR NO GOOD GROUNDS.**

RESPECTFULLY SHEWTH,

**FACTS:**

1. That the appellant is naturally born & bona fide citizen of Pakistan, and hails from respectable family of District Lakki Marwat.
2. That after going through the mandatorily required criteria and having been envisaged with the ordeals and inquisitions of selection process, the appellant got inducted onto the rolls of Respondent Department as warder (BPS-7) back in the year 2015.
3. That during the course of employment, the Appellant always performed his duties with full zest and devotion and have never left any stone unturned in performance of his duties and have won felicitations and appreciations of his high ups at certain junctures, moreover there is no such complaint filed against the appellant through 6 long years in service.

4. That the father of the Appellant was suffering from illness (Backache) and being his elder son appellant always remain present for looking after his father, however, the absence of the appellant from duty was not willful. **(Copy of the Medical Prescriptions are attached as Annexure-A).**
5. That one sided/impartial report has been submitted against the appellant by the then Superintendent of Central Prison Bannu, however, none of the statement has been recorded or record examine in presence of the appellant.
6. That as the appellant was busy with his father's treatment and look after/care and sooner after somehow recovery the appellant joined for duty in Central Jail Bannu from 16-05-2021 to 27-05-2021, where the Moharir of the Central Prison Bannu verbally informed the appellant that he has been removed from service while showing the removal in his own cell phone.
7. That the appellant has been 'removed from the service' vide the impugned office order No.1953-56 dated 26-05-2021 whereas the absent period of the appellant has been treated as "leave without pay". **(Copy of order dated 26.05.2021 is attached as Annexure-B)**
8. That against the order dated 26.05.2021, the appellant filed the departmental appeal however the same has also turn down vide impugned office order No.28296/P dated 02-09-2021 for no good grounds. **(Copies of departmental appeal and rejection order are attached as Annexure-C&D).**
9. That feeling aggrieved the appellant come to this august tribunal on the following grounds amongst others;

**GROUND:**

- A) That the both the impugned official orders are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That the appellant has not been properly informed as no show cause notice has been served/issued to the appellant, which is obligatory on the part of the respondents under Rule-9 of KPK civil servants E&D Rules, 2011 and has not been treated according to law and rules.
- C) That the absence period has already been declared as leave without pay, therefore there remained no ground to penalize the appellant.

- D) That neither the appellant was associated with the inquiry proceedings nor has any statement of witnesses been recorded in the presence of appellant & the appellant has been condemned unheard, that is clear violation of norms of Law & Justice.
- E) That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, both the impugned order are liable to be set aside on this score alone.
- F) That it is a cherished principle of law that where a law requires a thing to be done in a particular manner, the same is to be done in that manner and not otherwise.
- G) That keeping the previous service record of the appellant in view, penalty imposed by the then competent authorities of removal from service is very harsh which is passed in violation of law and, therefore, the same is not sustainable in the eyes of law.
- H) That the appellant was not willfully/Intentionally absent from his duties, though, his father was ill due to which he looked after his father. As the illness is beyond the control of human, therefore the appellant was compelled to remain absent from his duties due to the treatment and care of his father.
- I) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that on acceptance of this service appeal both the impugned office orders i.e. 28296/P dated 02-09-2021 & 1953-56 dated 26-05-2021 may be declared as void ab initio, illegal, unlawful & liable to be set aside and the appellant may also be reinstated with all back and consequential benefits,

Any other relief which this August tribunal deems fit and appropriate, may also be granted in favor of appellant.

Through

Appellant

Mansoor Salam  
Advocate  
High Court Peshawar.



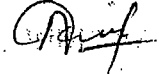
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

C.M No. \_\_\_\_/2022  
In  
Service Appeal No. \_\_\_\_/2022

Arif Ullah .....APPELLANT  
VERSUS  
I.G Prison of KPK & others .....RESPONDENTS


**Affidavit**

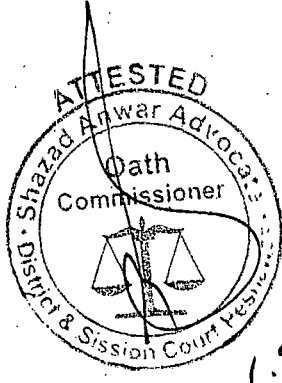
I, Arif Ullah Ex-Warder (BPS-07), Moh; Khuaidad Khel, District Lakki Marwat, do hereby solemnly affirm and declared on oath that the contents the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been withhold from this August Tribunal.



DEPONENT

CNIC:11201-4669042-3  
Cell No.0346-5679893

Identified by:   
Mansoor Salam  
Advocate, High Court  
Peshawar



06.01.2022



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

C.M No. \_\_\_\_\_/2022

In

Service Appeal No. \_\_\_\_\_/2022

Arif Ullah

.....APPELLANT

VERSUS

I.G Prison of KPK &amp; others

.....RESPONDENTS

**APPLICATION FOR CONDONATION OF DELAY****Respectfully Sheweth:**

1. That the instant service appeal is preferred by the appellant in which no date of hearing has yet been fixed.
2. That appellant/applicant is a serious patient of Gastroenterology i.e. Stomach problem, as well as appellant being elder of family was also busy in looking after his father who is also patient & needs his attention, and was under continuous treatment by the concerned specialist doctors, however due to serious ailment it was advised to have a complete rest and due to these reasons the alleged delay has been caused.
3. That the appellant/applicant before passing of the impugned orders informed the respondents about his father bed ridden ailment but neither the same was considered at the time of order nor was given any due weightage at the time of appellate removal from service orders which is gross illegality on the part of respondents and this August Tribunal with sympathetically considering the ailment may condone any delay pointed out at the time of arguments.
4. That the contents of the instant application may be read and considered as integral part of the main service appeal.
5. That the law of equity, fair play and propriety demands that the adjudication of cases should remained on merit rather on technicalities.

It is, therefore, most humbly prayed that the delay (if any) may kindly be condoned in the best interest of justice.

Appellant/applicant

Through

Mansoor Salam  
Advocate,  
High court Peshawar



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

C.M.No.\_\_\_\_\_/2022

In

Appeal No.\_\_\_\_\_/2022

Arif Ullah

.....APPELLANT

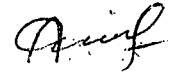
VERSUS

I.G Prison of KPK &amp; others

.....RESPONDENTS

**Affidavit**

I, Arif Ullah Ex-Warder (BPS-07), Moh; Khuaidad Khel, District Lakki Marwat, do hereby solemnly affirm and declared on oath that the contents the accompanying Application are true and correct to the best of my knowledge and belief and nothing has been withhold from this August Tribunal.



DEPONENT

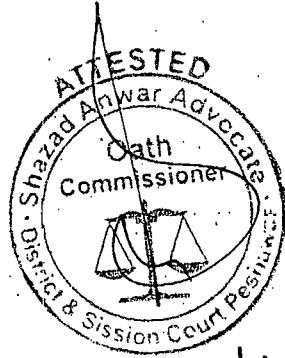
CNIC:11201-4669042-3

Cell No.0346-5679893

Identified by:



Mansoor Salam  
Advocate, High Court  
Peshawar



06.01.2022

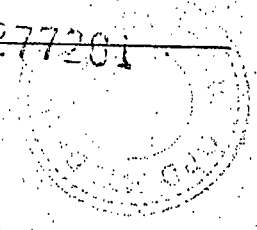
**M.T.I DHQ Teaching Hospital Bannu**

Out Patient Department

Name: F/Co. M. S. K. 277201

OPD No: 7685

Date: 24/3/62



*Balochistan  
Lahore  
for  
RSC  
Tribunals  
is well*

*Advised  
x-ray laboratory  
1186*

*Chc / Smeant  
Advised bed  
not for 1000  
units*

*Feb. 20/62*

*Plb. M. S. K.*

*Plb. Colone*

*Plb. M. S. K.*

*Cap. R. S. K.*

Medical Officer  
Dist. Headquarter Hospital  
Bannu

**M.T.I DHQ Teaching Hospital Bannu**

Out Patient Department

Name: F/O M. I. Khan

284100

OPD No: 9093

Date: 7/4/02



*Abul ali*

*Handels*

*Qano*

*Blawos MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

*MS*

Medical Officer  
Dist. Headquarter Hospital  
Bannu

**M.T.I DHQ Teaching Hospital Bannu**

(10)

Out Patient Department

Name: F/O *فوق*

OPD No: 10550

306702

Date: 21/4/21

*Banhab*

*knit pin*

*Pub - Poles 755*

*Difficulty*

*in walk*

*Pub - yit-g-10*

*CPBR*

*Lower*

*part*

*Pub - 1-1-11*

*Pub - Nise 105*

*Advised*

*CRP / Skin*

*test*

*Pub - Ubra*

*Advised bed*

*rest for*

*weeks*

*Cap - Nox 200*

~~Medical Officer  
District Quarter Hospital  
Bannu~~



# M.T.I DHQ Teaching Hospital Bannu

Out Patient Department

Name: F/O علی قاسم 277300

OPD No: 12192

Date: 19/5/21



→ Lower back pain radiating to left leg.

D. Schratco

Rx

Tab. Synjtex 500mg

ⓈⓈⓈ — 1+1

Tab. Mover 4mg

ⓈⓈⓈ — 1/1/1

Cap. Gabico 75mg

ⓈⓈⓈ — 1+1

Tab. Comforta

ⓈⓈⓈ — 1/1/1

Tab. Melthycobal

ⓈⓈⓈ — 1/1/1

Advised 10 days of strict bed rest

M. T. I Officer  
Distt. Headquarter Hospital  
Bannu





13

OFFICE OF THE SUPERINTENDENT  
PRISONS CIRCLE HEAD QUARTERS DIKHAN  
No. 1954-CE / PO Dtd 26-5-2021  
PH&FAX No: 0966-9200299  
cpdikhan1@gmail.com

Annex "B"

**OFFICE ORDER**

WHEREAS, the accused Mr Arif Ullah s/o Abdullah warden attached to Central Prison Bannu was proceeded against under Rule-3(b)(1) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges that he willfully absented himself w.e.f 23.03.2021 to 24.05.2021 without permission of the competent authority. Showcause Notice No. 1203-04 dated 05.04.2021 was also sent to him but he neither returned duty at Central Prison Bannu nor he appeared for personal hearing or submitted any type of response.

AND WHEREAS, he furnished reply but the same was found unsatisfactory.

AND WHEREAS, the undersigned being competent authority granted him the opportunity of personal hearing on 25.05.2021 as provided for under rules (ibid). The accused official completely failed to defend his case with documentary proof/evidence.

NOW therefore, in exercise of powers conferred under Rule-14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, having considered the charges, evidence on record, the explanation of the accused official and after affording the opportunity of personal hearing, the undersigned being competent authority, hereby award Major penalty of "REMOVAL FROM SERVICE" to Mr. Arif Ullah s/o Abdullah warden attached to Central Prison Bannu willful absence. The period of his absence w.e.f 23.03.2021 to 24.05.2021 is hereby treated as Leave Without pay

SUPERINTENDENT  
CIRCLE HQS PRISON DIKHAN

Enforcement No. 1954-CE

Copy of the above is forwarded to :-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
2. The Superintendent Central Prison Bannu. Necessary entry may please be made in the Service Book of official concerned under proper authorization.
3. DAO Bannu.
4. Warden Arif Ullah s/o Abdullah attached to Central Prison Bannu.

26-5-2021

SUPERINTENDENT  
CIRCLE HQS PRISON DIKHAN

BETTER COPY-13

Annexure-B

Office of the Superintendent  
Prisons Circle Head Quarter D.I.Khan  
No.1953/PB Dated 26.05.2015

**OFFICER ORDER**

WHEREAS, the accused Mr. Arif Ullah S/o Abdullah warder attached in Central Prison Bannu was proceeded against under Rule-3(b)(d) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charge that the willfully absented himself w.e.f 23.03.2021 to 24.05.2021 without permission of the competent authority. Showcause Notice No. 1203-04 dated 05.04.2021 was also sent to him but he neither resumed duty at Central Prison Bannu nor appeared for personal hearing or submitted any type of respondent.

AND WHEREAS, he furnished reply but the same was found unsatisfactory,

AND WHEREAS, the undersigned being competent authority granted him the opportunity of personal hearing on 25.05.2021 as provided for under rules. ibid. The accused official completely failed to defend his case with documentary proof/evidence.

Now therefore, in exercise of powers conferred under Rule-14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011, having considered the charge evidence on record, the explanation of the accused official and after affording the opportunity of personal hearing the undersigned being competent authority, hereby award Major Penalty of "REMOVAL FROM SERVICE" to Mr. Arif Ullah S/o Abdullah wards attached to Central Prison Bannu willful absence. The period of his absence w.e.f 23.03.2021 to 24.05.2021 at hereby treated as Leave without pay.

SUPERINTENDENT  
CIRCLE PRISON D.I.KHAN

Endorsement NO. 1954-56

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
2. The Superintendent Central Prison Bannu. Necessary entry may please be made in the service Book of official concerned under proper attestation.
3. DAO Bannu
4. Warder Arif Ullah s/o Abdullah attached to Central Prison Bannu.

SUPERINTENDENT  
CIRCLE PRISON D.I.KHAN



4- یہ کہ جب والد گرامی کو اتفاقاً شہ ہوا تو اسے مختلف بیرونی اور فقیریوں کے پاس دم درود کے لئے ادھر ادھر بھرا تاربا جو بیرونی فقیریوں کی دعاؤں اور دم درود کی وجہ سے والد ام کو پتہ اتفاقاً ہوا۔ نیز کئی مسدقات بھی کئے۔

5- یہ کہ اس دوران اسپتال منٹ کی اپنے گاؤں میں اچانک کسی کے ساتھ دشمنی پیدا ہوئی۔ جو من اسپتال منٹ کے مقابلے میں دو لہند اور اثر و رسوخ کا مالک تھا۔ جس کی خوف کی وجہ سے من اسپتال منٹ گھرتے بہت کم نکلتا تھا۔ خصوصاً والد ام اور والدہ ام کے پرزور اسرار پر من اسپتال منٹ گھر پر ہی رہتا۔ کیونکہ والدین ام انتہائی ضعیف العمر اور من اسپتال منٹ سے انتہائی محبت کرتے ہیں۔

6- یہ کہ من اسپتال منٹ بوجوہات بالا اپنی ڈیوٹی پر حاضر نہ ہو سکا۔ جس کا من اسپتال منٹ کو انتہائی افسوس ہے۔

7- یہ کہ من اسپتال منٹ نے فائل شوکا ز نوٹس کا حقیقت پر مبنی جواب دیا تھا۔ مگر اس کے باوجود من اسپتال منٹ کو یکطرفہ انکوآری کی بنیاد پر ملازمت سے برخاست کیا گیا۔ نقل آفس آرڈر بابت برخواسگی اسپتال منٹ از ملازمت ہمراہ لف ہے۔

8- یہ کہ من اسپتال منٹ کے خلاف انکوآری برطبق قانون اور گورنمنٹ سروس رولز کے مطابق نہیں ہوئی ہے۔ کیونکہ اس حقیقت کا ریکارڈ گواہ ہے کہ من اسپتال منٹ کو کسی بھی گواہ یا گواہان پر جرح کا موقع نہیں دیا گیا ہے۔ نیز جملہ سپینہ انکوآری انتہائی عجلت میں انجام تک پہنچائی گئی ہے کیونکہ من اسپتال منٹ سے فائل شوکا ز نوٹس کا جواب 17/5/2021 تک طلب کیا گیا تھا۔ جبکہ اسپتال منٹ کو شتوائی کا موقع دئے بغیر ملازمت سے مورخہ 26/5/2021 کو برطرف کیا گیا۔ جو کہ قانون اور انصاف کے تقاضوں کے منافی ہے۔

7- یہ کہ اسپتال منٹ اپنے بوڑھے والدین اور چھوٹے برادران کی کفالت کا واحد سہارا ہوں۔ اسپتال منٹ کے والدین انتہائی ضعیف العمر اور اکثر بیمار ہوتے ہیں۔ جن کی خدمت و مہارت اور علاج معالجہ کی ذمہ داری من اسپتال منٹ کے کندہوں پر ہے۔ نیز چھوٹے برادران جو زیر تعلیم ہیں۔ کی کفالت اور تعلیم کے خرچ کا بیڑا بھی من اسپتال منٹ نے اٹھایا ہوا ہے۔ اگر من اسپتال منٹ ملازمت پر دوبارہ بحال نہ ہو تو یہ من اسپتال منٹ کے بوڑھے والدین اور مذکورہ برادران کے لئے انتہائی دہچکے ثابت ہوگا۔ جو من اسپتال منٹ کے والدین کے لئے ناقابل برداشت اور برادران مذکورہ کی تعلیم اور مستقبل پر بھی انتہائی برا اثر پڑیگا۔



OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

91-9210334, 9210406

001-9213445

No. of the Ward / Order

282961

Dated

09-09-2021

**ORDER:**

WHEREAS, Warder Arif Ullah S/O Abdullah while attached to Prison Bannu was awarded the major penalty of "Removal from Service" and period of his absence w.e.f 23-03-2021 to 24-05-2021 treated as leave without pay by Superintendent HQs Prison D.I.Khan vide his office order No. 1953 dated 25-05-2021 due to his misconduct/willful absence from duty.

AND WHEREAS, the said Warder preferred his departmental appeal for setting aside the penalty awarded to him, which was examined in light of the available record of the case and it was observed that the appeal is time barred and penalty awarded to him by the competent authority due to his misconduct/willful absence from duty after observing all legal and codal formalities as required under S.O Rules 2011.

NOW THEREFORE, keeping in view the facts on record, the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 read with Rule-35 of Khyber Pakhtunkhwa Service Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being considered and without any substance.

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA, PESHAWAR.

INS No. 38297-99

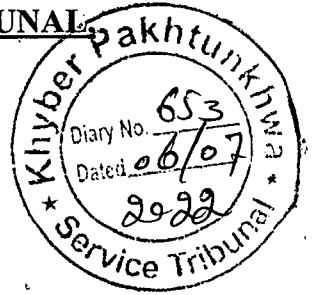
Copy of the above is forwarded to:-

Superintendent, Headquarters D.I.Khan for information and necessary action with reference to his order referred to above.

Superintendent Central Prison Bannu for information and necessary action. It is directed to inform the appellant accordingly and to make necessary entry in his Service Book under proper attestation.

Warder Arif Ullah S/O Abdullah R/O Mohallah Lakki Khwaidad Khel Tehsil District Lakki Marwat for information with reference to his appeal dated 25-08-2021 (Cell No.0311-8118311).

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



CM (documents) No. \_\_\_\_\_/2022  
In  
Service Appeal No. 54//2022

Arif Ullah (Warder)

V/S

IG Prison Police.

*Put up to the court with  
relevant appeal.*

**APPLICATION FOR PLACING ON FILE CERTAIN  
DOCUMENT ATTACHED HERewith THE  
APPLICATION FOR PERUSAL OF HON'BLE TRIBUNAL  
TO MEET THE END OF JUSTICE.**

*6/7/2022*

*Ready*

**RESPECTFULLY SUBMITTED:**

1. That the above titled service appeal is pending before this Hon'ble Tribunal and 07-07-2022 date has been fixed for adjudicating.
2. That certain documents which have been provided by the appellant after the institution of instant service appeal, so, therefore, the appellant wants to file these documents for the perusal of Hon'ble Tribunal to meet the ends of justice and to reach the fair conclusion.
3. That the attached document with this application is hereby annexed as Annexure "A" respectively.
4. That there is no legal embargo for allowing the instant civil miscellaneous application in the interest of justice.

It is, therefore, most humbly prayed that the application may be allowed and the attached documents may please be considered as a part of the service appeal for perusal of Hon'ble Tribunal to meet the ends of justice and to reach the fair conclusion. Any other remedy which august tribunal deems fit and proper may also be awarded in favor of appellant.

**APPELLANT**

Arif Ullah (Ex-Warder)

THROUGH

*Mansoor Salam*  
**(MANSOOR SALAM)  
ADVOCATE HIGH COURT  
PESHAWAR**

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

C.M (documents) NO. \_\_\_\_\_/2022  
IN  
Service Appeal No. 54/2022

Arif Ullah

V/S

IG KP Prison Police

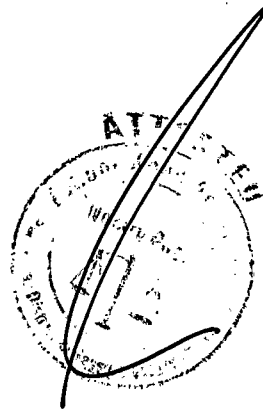
**AFFIDAVIT**

I, Arif Ullah S/o Abdullah, Ex-Warder Khyber Pakhtunkhwa Prison Police (Appellant) do hereby solemnly affirm and declare on oath that the contents of this Application are true and correct to the best of my knowledge and belief.

*Arif*  
DEPONENT

**IDENTIFY BY:**

*Mansoor Salam*  
**MANSOOR SALAM**  
**ADVOCATE HIGH COURT,**  
**PESHAWAR.**





# Dr. M. Zaheer Kundi

(Gold Medalist)

Physician & Gastroenterologist

M.B.B.S. (KMU)

M.C.P.S (Medicine)

F.C.P.S II (Gastro)

Hayat Abad Medical Complex Peshawar

PROCEDURE

Endoscopy

Gastroscopy

Flexible Sigmoidoscopy

Colonoscopy

(گولڈ میڈلسٹ)

Annex "A"

PMDC: 15091-N

(فریڈیشن اینڈ گیسٹرو انٹرا ویسٹ)

ایم بی بی ایس، (خیبر میڈیکل یونیورسٹی)

ایم سی پی ایس (میڈیسن)

ایف سی پی ایس II (گیسٹرو انٹرا ویسٹ)

حیات آباد میڈیکل کمپلیکس پشاور

Pt. Name

Arifullah

Age

29y

Sex

M Date 11/10/24

## Clinical Record

## Rx

~~Asp~~  
f. Mucprax

cur

cur

1. Sup. S-Dren

ob (2) — — — — — 2cc

2. Tab. Sulvacid

ob (2) — — — — — 2cc

3. cap Nevotefly

ob (2) — — — — — 4cc

4. Tab. Mucprax

ob (2) — — — — — 10cc

ob (3) — — — — — 10cc

inf concept (1000fl)

ob (2) — — — — — 4cc

دوپہر 2 بجے سے شام تک تا بروز اتوار صبح 8 تا شام

0301-9670355

0304-4052676

0304-9639722

مین جی ٹی روڈ نزد نیوسبزی منڈی بالمقابل ڈاکخانہ سرانے نورنگ

بعد الت

سروس ٹریبونل چیئر مینخواہ پشاور

2 مخانب سائن  
بنام

06/01/2022

سروس اپیل

دعویٰ  
جرم

I.G Prison &amp; others

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام پشاور کیلئے مندر مسلم تیمور علی خان ایڈووکیٹس

مقرر 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 تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت 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 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 06/01/2022

ماہ جنوری 2022ء

واہ العب

کے لئے منظور ہے۔

پشاور

بمقام

عارف اللہ ویلہ عبد اللہ سکندہ فیلہ خواجہ سید خلیل علی بیروت