

24th June, 2022

Counsel for the appellant present and submits that against the major punishment of compulsory retirement awarded to the appellant on 05.04.2022 he filed departmental appeal which was dismissed vide order dated 25.05.2022, and hence, this appeal which is within time. The appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee and security within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 17.8.2022 before S.B.

Rs-600/-
Appellant Deposited
Security & Process Fee
A. J. 24/6/22



(Kalim Arshad Khan)
Chairman

17.08.2022

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

Reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for reply/comments 10.10.2022 before S.B.

SCANNED
KPST
Peshawar





(Mian Muhammad)
Member (E)

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- _____ 932/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/06/2022	<p>The appeal of Mr. Anar Zaman presented today by Mr. Shahid Qayyum Khattak 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-	23.6.22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>24.6.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appcal No. 932 /2022

Anar Zaman Appellant

Versus

Government of Khyber Pakhtunkhwa and others Respondents


I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Memo of appeal with affidavit		1-4
2.	Address of the parties		5
3.	Copy of Charge Sheet and Statement of Allegation	A	6-7
4.	Copy of Reply	A-I	8-9
5.	Copy of Impugned order dated 05/04/2022	B	10
6.	Copy of Departmental Appeal	C	11
7.	Copy of impugned order dated 25/05/2022	D	12-
8.	Copy of other documents		13-23
9.	WakalatNama		24


Appellant

Through

Dated: 16/06/2022


Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan
Mob No. 0333-9195776

(1)

**BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWAPESHAWAR**

Service Appeal No. /2022

Anar Zaman S/o Sher Man R/o Dalan Tehsil Tall

District Hangu..... Appellant

Versus

1. Provincial Police Officer/ Inspector General of Police
Khyber Pakhtunkhwa, Peshawar
2. The Commandant FRP, Khyber Pakhtunkhwa, Peshawar
3. Superintendent of Police, FRP Kohat Range, Kohat
4. Government of Khyber Pakhtunkhwa through
Chief Secretary, Peshawar Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED 05/04/2022 PASSED BY
RESPONDENT NO. 3 BY WHICH THE APPELLANT HAS BEEN
AWARDED MAJOR PUNISHMENT OF COMPULSORY
RETIREMENT FROM SERVICE, AND AGAINST THE ORDER
DATED 25/05/2022 PASSED BY RESPONDENT NO. 2 VIDE
WHICH THE DEPARTMENTAL REPRESENTATION/ APPEAL FILED
BY APPELLANT HAS BEEN REJECTED

PRAYER

On accepting this service appeal, the impugned orders dated
05/04/2022 and order dated 25/05/2022 may graciously be
set aside by declaring it illegal, unlawful, without authority,
based on mala fide, void abinitio and thus not sustainable in
the eyes of law and appellant is entitled for reinstatement in
service with all back benefits of pay and service

Respectfully Sheweth;

1. That appellant was inducted in FRP Police as Constable in the year
2009 and has rendered satisfactory service in the Department and
performed his duties in Kohat Range Kohat with full zeal and
enthusiasm.

2. That Respondent No. 3 initiated disciplinary proceeding against appellant and issue charge sheet and statement of allegation which was properly replied. (Copy attached as Annexure "A" & "A-I")
3. That thereafter inquiry was initiated against the appellant and respondent No. 3 passed an order dated 05/04/2022 vide which the major punishment of " Compulsory Retirement from Service" and the absent period of 105 days has been treated as leave without pay has been passed against appellant without collecting any evidence. (Copy of impugned order is attached as Annexure "B")
4. That appellant filed departmental appeal /representation (the facts and ground agitated therein may please be treated as part and parcel of this appeal) against the impugned order before respondent No. 2, who vide order dated 25/05/2022 rejected the same without complying codal formalities. (Copy of appeal and impugned order are attached as Annexure "C" and "D")
5. That now appellant feeling aggrieved from the above orders hence, filling this appeal on the following amongst other grounds inter alia

GROUNDS:


- a. That both the impugned orders of the respondents are illegal, unlawful, without authority, based on mala fide intention, against the natural justice, violative of the Constitution and Service Law and equally without jurisdiction, hence the same are liable to be set aside in the best interest of justice.
- b. That both the impugned orders passed by respondents are very much harsh, without any evidence based on surmises & conjectures and is equally against the principle of natural justice.
- c. That during enquiry proceedings none was examined in support of the charges leveled against appellant neither has proper opportunity of hearing been provided to appellant. No allegations mentioned above are practiced by the appellant nor proved against him through any cogent reason or evidence.

- d. That appellant has explained the reason and ground in his reply due to which he remain absent from duty and has provided all the relevant medical documents but the same has not been considered nor any proper enquiry in this respect has been conducted to brush aside the same.
 - e. That the inquiry officer failed to collect any evidence in support of the charges. No one was examined as witness in presence of appellant nor was appellant confronted with any documentary or other kind of evidence on the basis of which the impugned orders were passed.
 - f. That the impugned orders have been passed in violation of law and rules of disciplinary proceedings and principles of natural justice. The authority wrongly and malafidly based the impugned orders without giving any reason with proof whatsoever, therefore the impugned order is bad in law.
 - g. That it is the settle principle of justice that no one should be condemn un heard but in the instant case no proper enquiry has been conducted to enquire regarding the allegations. No independent witness has been examined in front of appellant nor any opportunity of cross examination has been provided to appellant. Both the impugned orders are based on non reading and mis reading of available record.
 - h. That respondent No. 2 has not decided the departmental appeal / representation in accordance to the rules and regulation which clearly shows mala fide intention thus, has no sanctity in the eyes of law thus the act of respondents are totally based on male fide intention which clearly shows discrimination and undue victimization.
 - i. That no Show Cause notice has been served /issued to appellant regarding the award of impugned punishment
 - j. That the appellate authority has not provided any personal hearing opportunity to the appellant nor the order passed is speaking one.
-


(4)

It is, therefore, most humbly prayed that on accepting this service appeal, the impugned orders dated 05/04/2022 and order dated 25/05/2022 may graciously be set aside by declaring it illegal, unlawful, without authority, based on mala fide, void abinitio, and thus not sustainable in the eyes of law and appellant is entitled for reinstatement in service with all back benefits of pay and service.

Any other relief not specifically prayed for but deems appropriate in the circumstances of the case may also be granted.


Appellant

Through


Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

Dated: 16 / 06 / 2022

Certified that as per instruction of my client no such appeal has been filed before this Hon'ble Forum.


Advocate

AFFIDAVIT

I, Anar Zuman S/o Sher Man R/o Dalan Tehsil Tall District Hangu, do hereby solemnly affirm and declare on Oath that the contents of the above appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Tribunal.


Deponent

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BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. /2022

Anar Zaman Appellant

Versus

Government of Khyber Pakhtunkhwa and others Respondents


ADDRESSES OF THE PARTIES

APPELLANT


Anar Zaman S/o Sher Man R/o Dalan Tehsil Tall
District Hangu

RESPONDENTS

1. Provincial Police Officer/ Inspector General of Police
Khyber Pakhtunkhwa, Peshawar
2. The Commandant FRP, Khyber Pakhtunkhwa, Peshawar
3. Superintendent of Police, FRP Kohat Range, Kohat
4. Government of Khyber Pakhtunkhwa through
Chief Secretary, Peshawar


Appellant

Through


Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

Dated: 16/06/2022

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Annex "A"

PA/CH Sheet-2021

No. 09 /PA/FRP

Dated 11 / 01 /2022

CHARGE SHEET

- I) I, Aman Ullah Khan, SP FRP Kohat as competent authority, am of the opinion that you Constable Anar Zaman No. 5865 of FRP Platoon No. 116 District Hangu, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
- (a) That as reported vide DD No. 05 dated (29.11.2021, you have absented yourself from duty on various dates i.e w.e.f 29.11.2021 to 09.12.2021 and 14.12.2021 to till date, without any leave or prior permission of the competent authority. In this regard a show cause notice No. 284/PA dated 24.12.2021 was issued to you but neither received nor submitted reply. Thus you have committed a gross "Misconduct" as defined in Rule 2 (iii) of Police Rules 1975".
- II). By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned, therefore it is decided to proceed against you in general police proceeding.
- III). You are, therefore, required to submit your written reply within 07 days of the receipt of this charge sheet to the Enquiry Officer.
- IV). Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in case, ex-parte action shall follow against you.
- V). Intimate as to whether you desire to be heard in person or not?
- VI) A statement of allegation is enclosed.

Aman Ullah Khan
ATTESTED

[Signature]
SUPERINTENDENT OF POLICE, FRP
KOHAT RANGE, KOHAT

6-9

BATTER COPY

No. 09/PA/FRP

Dated. 11.01.2020

Charge Sheet

I) I, Aman Ullah Khan, FRP Kohat as competent authority, am of the opinion that you Constable Anar Zaman No. 5865 of FRP Platoon No. 116 District Hangu, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

(a) That as reported vide DD to. (sic) dated 29.11.2021, you have absented yourself from duty on various date i.e. w.e.f 29.11.2021 to 09.12.2021 and 14.12.2021 to till date, without my leave or prior permission of the competent authority. In this regard a show cause notice No. 284/PA dated 24.12.2021 was issued to you but neither received nor submitted reply Thus you have committed a gross "Misconduct to as denied in Rule 2 (iii) of Police Rules 1975"

II) By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned, therefore it is decided to proceed against you in general police proceedings.

III) You are; therefore, required to submit your written reply within 7 days of the receipt of this chars Enquiry Officer:

IV) Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in case, ex-parte action shall follow against you.

V) Intimate as to whether you dust to be heard in person or not?

VI) A statement of allegations enclosed.

Sd/-

SUPERINTENDENT OF POLICE, FRP
KOHAT RANGE, KOHAT


ATTESTED

DISCIPLINARY ACTION

I, Aman Ullah Khan, SP FRP Kohat as competent authority, am of the opinion that you Constable Anar Zaman No. 5865 of FRP Platoon No. 116 District Hangu, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

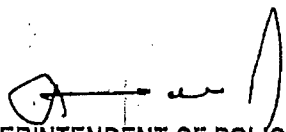
(a) That as reported vide DD No. 05 dated 29.11.2021, you have absented yourself from duty on various dates i.e. 29.11.2021 to 09.12.2021 and 14.12.2021 to till date, without any leave or prior permission of the competent authority. In this regard a show cause notice No. 284/PA dated 24.12.2021 was issued to you but neither received nor submitted reply. Thus you have committed a gross "Misconduct" as defined in 'Rule 2 (iii) of Police Rules 1975".

2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegations, SI Jamal Shah LO FRP Line Kohat is appointed as enquiry officer.

3. The inquiry officer shall conduct proceeding in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record his finding and make with twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.

4. The delinquent official shall join the proceeding on the date, time and place fixed by the officer.

ADMITTED


SUPERINTENDENT OF POLICE, FRP
KOHAT RANGE, KOHAT

جناح عالی -

گوارہ چارٹس ہسپتال ٹریڈ مارک 09/PA/FRP
SP صاحب FRP کو جسٹس کے عرض خدمت میں 11-2-22ء میں مسائل کو
غیر حاضر کی پر چارٹس ہسپتال متذکرہ ٹریڈ مارک یا ایسا چارٹس کیا گیا ہے۔
مسائل نے تاثر سرورجوں کی بنیاد پر چارٹس کی کئی سے جس
میں مسائل کی کوئی بددینی نہ ہے۔ بلکہ یوحہ سے اس پر تجویزی

مسائل مورخہ 29/11/21 سے چارٹس اور دردمین ہسپتال ہوا۔
اور تکلیف ناقابل برداشت حد تک ہو چکی تھی۔ ایسے حالات میں
رہمت کی منظوری سے فراہم کیے گئے تھے۔ تاہم اس وقت تک
تکلیف میں مسائل سمجھے گئے ہیں۔ قاصر تھا۔ قوی ہسپتال رٹنگ
ہسپتال چارٹس چارٹس ڈاکٹر صاحب نے مسائل کی تکلیف کو دیکھتے
ہوئے داخل کیا اور مورخہ 09/12/21 کو ہسپتال سے بعد سے باقی
ڈسچارج ہوا۔

مسائل نے ڈسچارج ہونے اور چلے گھرنے کے قابل ہو کر ہیں
سے ایسی ڈیوٹی کے چارٹس کی جسٹس مورخہ 12/1/22 کو دوبارہ
تکلیف میں ہسپتال کے ہسپتال اور ڈاکٹر صاحب نے ہسپتال کیا جسٹس
12/20/21 تک دوبارہ داخل ہسپتال کیا۔ مسائل کے مختلف ہسپتال
کئی سے ہسپتال سے ڈسچارج ہونے سے متعلق ڈاکٹر صاحب نے
02 ماہ تک سے ہسپتال سے ڈسچارج ہونے کی اور کسی بھی طرح
چلنے کے لئے و فریکل ایبلٹی نہیں منع کیا۔

مسائل کے گھر میں گھر کی فوڈ کے فریج سے کئی وجہ سے افران چارٹس
کو مطلع نہ کر سکا۔ گھر میں سے ہی اور فریکل ایبلٹی
کی ڈاکٹر سے اجازت ملنے پر مورخہ 07/03/22 کو چارٹس آیا۔ اور تا دم
تک رہا ڈیوٹی پر موجود ہیں۔

مسائل کی غیر حاضری سے ہسپتال بنیاد پر متعلقہ ڈاکٹر کے
ہدایت و حکم پر ڈیوٹی مسائل بوجہ طبیعت نامتاری چلے

PTO

ATTESTED

کوٹے اور ڈیوٹی دینے سے قاصر تھا۔
سائٹ میں ڈیفنڈر چارجز سے تعلق رکھتا ہے۔ ایسی لے
نورج 0932-022 کو ڈیپارچمنٹ سے برتوڑی حاکم کی رپورٹوں
درج آئی

درج بالا محوریوں کو مدنظر رکھتے ہوئے آپ
صاحبان سے استدعا ہے سائٹ کی ڈیپارچمنٹ کو جلد مکمل ہو
سین سٹار کٹا جائے اور چارجز سٹپ بنا کارروائی قائل کی
جائے

محکم توارس ہوئی

العارض

ایس اتارز مان 5865 سٹوں عرق ۱۱۶
حال متعین کھانڈر سٹل صلح بند

نوٹ ہر

13-3-022

نقدیات حاکم کی، ڈائل کی اصلاح
ڈیپارچمنٹ سٹپ لے کر ہیں۔

0348-0013216

(10)

Annex-B

PA order-2021-22

ORDER

My this order will dispose off departmental inquiry conducted against Constable Anar Zaman No. 5865/FRP, under Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (Amended in 2014).

The allegations against him are that as reported vide DD No. 05 dated 29.11.2021, he remained absent from duty on various dates i.e. w.e.f 29.11.2021 to 09.12.2021 and 14.12.2021 to 07.03.2022 and 08.03.2022 to 20.03.2022 (Total absence period is 105 days). In this regard, he was issued show cause notice vide this office No. 284/PA dated 24.12.2021, but he failed to receive copy of it within stipulated period. In this regard, proper departmental enquiry was conducted against him through L.O FRP Hangu who after conducting enquiry submitted his finding report wherein he found him guilty and recommended him for punishment.. In the light of finding of E.O, he was called in OR and heard in person. During personal hearing his contention was not found satisfactory.

His Service record perused which revealed that he was enlisted as Constable on 05.08.2009. There are 04 bad entries and 25 entries of "absence treated as without pay" against him with no good entry in his credit. He has previously remained absence for 272 days. He has also been dismissed from service by the then SP FRP Kohat vide OB No. 283 dated 05.05.2014 on account of prolonged absence. The said constable is habitual absentee and there is no chance of him to mend his trend.

Therefore, I, Aman Ullah, SP FRP Kohat Range, Kohat in exercise of powers vested in me under Rule 5(5) of Khyber Pakhtunkhwa Police Rules-1975 (Amended in 2014), treated the period he remained absent i.e. 105 days as leave without pay and award him a major punishment of "compulsory retirement from service" with immediate effect.

OB No. 164

Superintendent of Police, FRP,
Kohat Range, Kohat.

Dated 05-04-2022

OFFICE OF THE SUPERINTENDENT OF POLICE, FRP, KOHAT RANGE, KOHAT

NO. 184 /PA DATED KOHAT THE 06/04/2022

Copy to:

1. The Commandant FRP Khyber Pakhtunkhwa Peshawar for favour of information please.
 2. Pay Officer
 3. Reader
 4. ✓ OHC
 5. SRC
- } for further necessary action

[Signature]
ATTESTED

11

Annex - "C"

To,

The Deputy Commandant
FRP Peshawar.

Sub: DEPARTMENTAL APPEAL AGAINST THE ORDER OB NO. 164 DATED 05-04-2022 OF THE SUPERINTENDENT OF POLICE, FRP KOHAT RANGE KOHAT, WHEREBY THE APPELLANT WAS COMPULSORY RETIRED FROM SERVICES.

Respected Sir,

1. That the appellant belongs to a respectable and poor family of Tehsil & District Hangu and was serving as Constable No. 5865/FRP at Kohat Range Kohat since 2009 till date.
2. That the appellant has been dutiful and fully devoted to his profession and served up to the satisfaction of his superiors.
3. That the appellant was severe ill and was under treatment at LRH Peshawar.
4. That the appellant was unable to join his duty as the doctor has prescribed him to get complete bed rest for three months. (Copy of the medical prescription and leave advised by doctor are attached herewith)
5. That the absence of the appellant was not willful but beyond his control and due to the above said medical reasons.
6. That the appellant is a married person and care taker of his old and sick parents and four (4) minor children's and the only source of income for his large family.
7. That the appellant was not dealt in accordance with law and was never sent a charge sheet or a show cause or final show cause notice by the respondents.
8. That the appellant was not treated in accordance with the report of inquiry officer.
9. That the appellant was punished for no fault on his part.

It is therefore, most humbly prayed that the order dated 05-04-2022 of the superintendent of police FRP Kohat Range Kohat may kindly be set aside and the appellant may kindly be reinstated to his services with all back benefits.

(Signature)

Appellant

ANAR ZAMAN
S/O Sherman
Constable No. 5865
Contact No. 0334-1980772

ORDER

(12)

Annex - 'D'

This order will dispose of the departmental appeal preferred by ex-constable Anar Zaman No. 5865 of FRP Kohat Range, against the order of SP FRP Kohat Range, Kohat, issued vide OB No. 164, dated 05.04.2022, wherein he was awarded major punishment of compulsory retirement from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 29.11.2021 to 09.12.2021, 14.12.2021 to 07.03.2022 and 08.03.2022 to 20.03.2022 for total period of 105 days, without any leave or prior permission of the competent authority.

In this regard, a departmental enquiry was conducted against him as he was issued Show Cause Notice, vide No. 284/PA, dated 24.12.2021, but he refused from the receiving of the said Show Cause Notice. Subsequently, proper departmental enquiry was initiated against him as he was issued Charge Sheet alongwith Summary of allegations and Line Officer FRP Hangu was appointed as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his finding report, wherein he found him guilty of the charges leveled against him and recommended for suitable punishment.

Upon the finding of Enquiry Officer, he was called in orderly room and heard in person, but he failed to convince the competent authority regarding to his innocence.

Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of compulsory retired from service vide OE No. 164, dated 05.04.2022.

Feeling aggrieved against the impugned order of SP FRP Kohat Range Kohat, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 19.05.2022.

During the course of personal hearing, the applicant failed to present an justification regarding to his innocence. From perusal of enquiry file it has been found that the allegations were fully established against him during the course of enquiry. There doesn't seem any infirmity in the order passed by the competent authority therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Commandant FRP, Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order Announced.

[Signature]
ATTESTED

[Signature]
Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar

No. 419-20 /PA, dated Peshawar the 25/05/2022.

Copy of above is forwarded for information and necessary action

- the:-
1. SP FRP Kohat Range, Kohat. His service record alongwith D file sent herewith
 2. Ex-constable Anar Zaman No. 5865 FRP Kohat Range, S/o Sher Man I Dallon District Hangu.

13



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

Patient Identification
Anar Zaman
S/O
Sherman
34 years ♂

DISCHARGE SUMMARY

Attending Physician: Medical "D"

Clinical Service:

Date of Admission: 29-11-2021 Date of Discharge: 09-12-2021

Secondary Diagnosis (es): Pyrexia of Unknown origin

Procedures / Operations: 1st. R/Oception 1gm to BD - 0 week
1st. Gen - m 120 mg to BD - 1
1st. Proves to SUS

Consultation:

Brief History & Hospital: This 34 years old male presented to us e/c of fever from last 4 weeks, which was intermittent & high grade. fever was also associated e abdominal pain which was mild & diffused in nature. There was no other associated symptoms. O/E young gentleman febrile, anemic, no icterus. No enlarge LN, No hepatosplenomegaly.

Discharge Medication: 1st. R/Oception 1gm to BD 1 day
1st. Nuberal 1cl - 1 week
1st. Dextop 30 mg 1 BD - 1 week

Activity & Dietary Instruction:

Follow-up instruction: (3) دن بعد نشہ سبب OPD شرف لائیں

Nurse: Doctor:

I have read and understand the given instructions.

Patient / Responsible Person's (Name) Signature Discharge summary

Junior Registrar
Acute Medical Unit
Lady Reading Hospital

ATTESTED

14

Shifa Medical LABORATORY



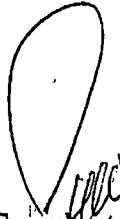
Add: Room No# A-212, 2nd Floor
Akbar Medical Center
Dabgari Garden Peshawar
Mob: 0300-5764811/0346-8867578

DISCLAIMER THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

Patient Name: Anar Zaman Age: Years Sex: Male
Referred By: LRH Date: 29/11/21 Report No: 1
Test Required: CBC, ESR Specimen: Blood

Haematology Studies

Test	Result	Unit	Normal Value
Differential Count			
Neutrophils	80	%	40 - 75
Lymphocytes	20	%	20 - 50
Monocytes	00	%	1 - 6
Eosinophils	00	%	1 - 6
Erythrocytes			
Haemoglobin	13.9	G/dl	M 13.0 - 18.0 F 11.5 - 16.5
E.S.R.	67	mm/1st hour	M 2 - 15 F 2 - 20
Leucocytes			
WBC Count	13400	/ul	4000 - 11000
Platelet Count	1,89,000	/c min	150.000 - 400.000


Consultant

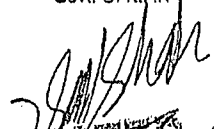
Dr. Rafi Ullah
MBBS, PMDC.

Tahir Khattak
Lab Tech (DMLT)
Govt. Khyber Girls Medical
College Peshawar

Maki Ullah
Lab Tech (DMLT)
Govt. Lady Reading Hospital,
Peshawar

Mr. Muneef Gul
DMLT (PATH)
Medical Faculty
Govt. Of K.P.K

Mr. Adnan Khan
DMLT (PATH)
Medical Faculty
Govt. Of K.P.K


ATTESTED

15

Shifa Medical LABORATORY



Add:
Room No# A-212, 2nd Floor
Akbar Medical Center
Dabgan Garden Peshawar
Mob:
0300-5764811/0346-8867578

DISCLAIMER THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

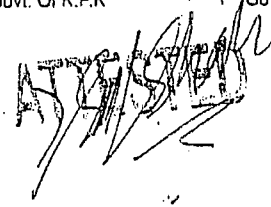
Patient Name: Anar Zaman Age: Years Sex: Male
Referred By: LRH Date: 29/11/21 Report No: 2
Test Required: LFT Specimen: Blood

Bio-Chemistry

Test	Result	Unit	Normal Value
Hepatic Profile			
Bilirubin Total	2.2	mg/dl	0 - 1.0
SGPT (AL T)	144	u/l	M 0-43 F 0.36
Alkaline Phosphatase	188	u/l	


Consultant

Dr. Rafi Ullah MBBS, PMDC.	Tahir Khattak Lab Tech (DMLT) Govt. Khyber Girls Medical College Peshawar	Maki Ullah Lab Tech (DMLT) Govt. Lady Reading Hospital, Peshawar	Mr. Muneef Gul DMLT (PATH) Medical Faculty Govt. Of K.P.K	Mr. Adnan Khan DMLT (PATH) Medical Faculty Govt. Of K.P.K
--------------------------------------	---	--	---	---



Shifa Medical

LABORATORY



Add:
 Room No# A-212, 2nd Floor
 Akbar Medical Center
 Dabgari Garden Peshawar
 Mob:
 0300-5764811/0346-8867578

DISCLAIMER THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

 Patient Name: Anar Zaman Age: Years Sex: Male
 Referred By: LRH Date: 29/11/21 Report No: 3
 Test Required: RFT, S Electrolytes Specimen: Blood

Bio-Chemistry

Test	Result	Unit	Normal Value
Electrolytes			
Sodium	136.1	mEq.l	136 - 149
Potassium	4.2	mEq.l	3.8 - 5.2
Chloride	101.1	mEq.l	98 - 107
Renal Profile			
Urea	31	mg/dl	10 - 50
Creatinine	0.8	mg/dl	0.6 - 1.2

(Signature)
 Consultant

Dr. Rafi Ullah
 MBBS, PMDC.

Tahir Khattak
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 Govt. Khyber Girls Medical
 College Peshawar

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 DMLT (PATH)
 Medical Faculty
 Govt. Of K.P.K

Mr. Adnan Khan
 DMLT (PATH)
 Medical Faculty
 Govt. Of K.P.K

ATTENDED
(Signature)



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

Patient Identification

Anar zama

S/O

Sherma

34 years J

DISCHARGE SUMMARY

Attending Physician:

Medical - D

Clinical Service:

Date of Admission:

14/12/2021

Date of Discharge:

20/12/2021

Secondary Diagnosis (es):

DUO

Procedures / Operations:

Consultation:

Brief History & Hospital

34 year old gentleman, readmitted for fever
worse up. antibiotic & antimalarial not
responding. Blood c/s report awaited.
Pt advised to take plenty of fluids & do
rest & visit OPD with c/s (blood report).

Discharge Medication:

Tab. Terivid 600mg r.e.l - (10 days)

Tab. Provas-N 1 r.e.l - (10 days)

Activity & Dietary Instruction:

Adv

Strictly Bed rest @ m^o

Follow-up Instruction:

avoid physical activities.

Take plenty of fluids.

Visit OPD with report

Nurse:

Doctor:

Signature

Junior Registrar
Signature Medical Unit
Lady Reading Hospital

I have read and understand the given instructions.

Patient / Responsible Person's (Name

) Signature

Discharge summary

ATTENDED

19

Shifa Medical LABORATORY



Add:
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Akbar Medical Center
Dabgari Garden Peshawar
Mob:
0300-5764811/0346-8867578

DISCLAIMER: THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

 Patient Name: Anar Zaman Age: Years Sex: Male
 Referred By: LRH Date: 14/12/21 Report No: 3
 Test Required: Serum Electrolytes Specimen: Blood

Bio-Chemistry

Test	Result	Unit	Normal Value
Electrolytes			
Sodium	138.1	mEq.l	136 - 149
Potassium	4.21	mEq.l	3.8 - 5.2
Chloride	100.1	mEq.l	98 - 107


Consultant

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MBBS, PMDC.

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ATTESTED


Shifa Medical LABORATORY



Add:
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Akbar Medical Center
Dabgari Garden Peshawar
Mob:
0300-5764811/0346-8867578

DISCLAIMER THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

Patient Name: Anar Zaman Age: Years Sex: Male
Referred By: LRH Date: 14/12/21 Report No: 2
Test Required: LFT, Urea, Creatinin Specimen: Blood

Bio-Chemistry

Test	Result	Unit	Normal Value
Hepatic Profile			
Bilirubin Total	0.8	mg/dl	0 - 1.0
SGPT (ALT)	54	u/l	M 0-43 F 0.36
Alkaline Phosphatase	197	u/l	100 - 270
Renal Profile			
Urea	28	mg/dl	10 - 50
Creatinine	0.6	mg/dl	0.6 - 1.2

Consultant

Dr. Rafi Ullah
MBBS, PMDC.

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College Peshawar

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Peshawar

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Mr. Adnan Khan
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Medical Faculty
Govt. Of K.P.K

ATTENDED

Shifa Medical LABORATORY



Add:
Room No# A-212, 2nd Floor
Akbar Medical Center
Dabgar Garden, Peshawar
Mob:
0300-5764811/0346-8867578

DISCLAIMER: THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

Patient Name: Anar Zaman Age: Years Sex: Male
Referred By: LRH Date: 14/12/21 Report No: 1
Test Required: FBC, ESR Specimen: Blood

Haematology Studies

Test	Result	Unit	Normal Value
Differential Count			
Neutrophils	70	%	40 - 75
Lymphocytes	30	%	20 - 50
Monocytes	00	%	1 - 6
Eosinophils	00	%	1 - 6
Erythrocytes			
Haemoglobin	14.2	G/dl	M 13.0 - 18.0 F 11.5 - 16.5
E.S.R.	34	mm/1st hour	M 2 - 15 F 2 - 20
Leucocytes			
WBC Count	9200	/ul	4000 - 11000
Platelet Count	2,04,000	/c mm	150,000 - 400,000

(Signature)
Consultant

Dr. Rafi Ullah
MBBS, PMDC.

Tahir Khattak
Lab Tech (DMLT)
Govt. Khyber Girls Medical
College Peshawar

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(Signature)
ATTESTED

Shifa Medical LABORATORY



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Dabgar Garden Peshawar
Mob: 0300-5764811/0346-8867578

DISCLAIMER: THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

Patient Name: Anar Zaman Age: Years Sex: Male

Referred By: LRH Date: 14/12/21 Report No: 4

Test Required: Urine R/E Specimen: Urine

Urine

Test	Result	Unit
Chemical		
Albumin	Nil	
Sugar	Nil	
Microscopy (centrifuged Deopsit)		
Red Cells	Nil	/HPF
Pus Cells	03 --- 04	/HPF
Physical		
Quantity	30 ml	
Colour	Pale Yellow	
PH	Acidic	
Sp. Gravity	1.020	

[Signature]
Consultant

Dr. Rafi Ullah MBBS, PMDC.	Tahir Khattak Lab Tech (DMLT) Govt. Khyber Girls Medical College Peshawar	Maki Ullah Lab Tech (DMLT) Govt. Lady Reading Hospital, Peshawar	Mr. Muneef Gul DMLT (PATH) Medical Faculty Govt. Of K.P.K	Mr. Adnan Khan DMLT (PATH) Medical Faculty Govt. Of K.P.K
--------------------------------------	---	--	---	---

ADJUSTED
[Signature]

23

KPHCC No 04718

PMDC No :20614-N

City Care Medical Laboratory



سٹی کیئر میڈیکل لیبارٹری

P Name:	Anar Zaman	Age:	Years	Sex:	Male
Test Req:	Blood C/S			Date:	24/12/2021
Ref By:	L R H			Specimen:	Blood

Clinical Microbiology

Result:

Detected no growth of microorganism after 7 Days
Aerobic Incubation at 37 C

Consultant

DR. NOOR KHAN LAKHNANA
Proficler of Pathology
MBBS MCPS M PHIL FCPP

DR. RAHMAT KHAN
MBBS DC RMP
Saidu Medical College

Quality Lab Service For All Diagnostic Test Not Valid For Court

Add: Basement Zahid Plaza Near Khushal Medical Center Dabgari Garden Peshawar

PH:091-2563619

Cell:0313-1953387 / Email:marcofshah919@gmail.com

BRANCH OFFICE: CITY CARE: Medica Laboratory Mardan. 0321-9717388
CITY: Medical Laboratory Miranshah. 092-8312930
SHIFA: Medical Laboratory Kohat Road Opp City Hospital. 0312-9093347

TESTED

بجالتی عدالت
Services Tribunal, KP

Service appeal No. 1/2022

Appellant
2022ء کا نمبر
انار زمان بنام گورنمنٹ وٹلرز

موزعہ
مقدمہ
دعوئی
پریم

باعث تحریر آنکھ

مقدمہ مندرجہ بالا میں اپنی نظر سے اس کے واسطے پیروی اور جواب دہی اور کل کاروائی متعلقہ
آج کے مقام پر یہ ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
مقررہ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو رضی نامہ کرنے سے تفریق حالت و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور
باید ورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرا میں پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل گرانٹ 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 لایا اپنے بجائے تفریق اختیار
ہوگا۔ اور صاحب مقرر شدہ کو کسی دہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا اہلیت
پر داخلہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جات 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
مذکورہ کریں۔ اہر اوکالت نامہ تصدیق یا کہ مندر ہے۔

انار زمان ولد شہباز
مکملہ جملہ تفریق وکل وکیل وکیل

المرقوم 16 06 2022ء

Accepted

Signature

Signature

بجاء التریبونل خدماتی

Service appeal (No. 1/2022

Appellant

جناب 2022

انارضان بنام گورنمنٹ و غیرین

موزخ
مقدم
دعوی
پریم

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی وکل کاروائی متعلقہ
آج کے مقام شہاد کیلئے مقدمہ مندرجہ بنام گورنمنٹ و غیرین
مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرتے وقت تقریر ثالثہ فیصلہ پر حلف دیے جناب وہی اور اقبال دعویٰ اور
بلا ضرورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل گمرانی 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 یا اپنے بجائے تقریر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا اہلیت
پر اہلیت منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب 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۔

المترقوم 16 06 2022

Accepted

Accepted

Shah

شہاد

Shah

انارضان ولد شہزادان
مکملہ وکل محمد نوب دلن، کھیل واپس جیلو

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

S.B

No.

APPEAL No..... 932 of 2022 .

Anwar Zaman

Appellant/Petitioner

Versus

F/P.O. I-CP KPK Pesh.

RESPONDENT(S)

Respondent No. 1

Notice to Appellant/Petitioner

Provincial Police Officer
Inspector General of Police KPK
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17/8/2022 at 9:00 A.M.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Copy is Attached
For Reply

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

4-8-22

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

9.9

No.

APPEAL No. 932 of 20 22

Anar Zaman

Appellant/Petitioner

Versus

P.P.O. IGP Pesh.

RESPONDENT(S)

Respondent No. 4) Govt, of KPK Through

Notice to Appellant/Petitioner

Chief Secretary Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17/8/2022 at Peshawar

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Copy 15 Attached } For Reply

**Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

ATW
18/8/22
CHIEF SECRETARY
Govt of Khyber Pakhtunkhwa
Peshawar

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. S.B

No.

APPEAL No. 932 of 20 22

Anar Zaman

Appellant/Petitioner

Versus

P.P.O I.G.P KPK Pesh.

RESPONDENT(S)

Respondent No. (2)
The Commandant FRD
KPK Peshawar.

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17/8/2022 at 9.00 AM

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(copy is attached)
For Reply

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.