

28-5-2013

Appellant with counsel present.
No one is present on behalf of respondents.
The Bench could not proceed to D.I. Khan
owing to promulgation of KPK ordinance No. 11
of 2013. Case adjourned to 25-6-2013 at
Camp Court, D.I. Khan - Fresh notices be
issued to respondents for submission of written
reply on the date fixed.

[Signature]
Registrar
Camp Court
D.I. Khan

25-6-2013

Appellant in person and Naveed Zafar
AAO for respondents No. 4 with G.P. for respondents
present. The Bench could not tour to D.I. Khan
owing to promulgation of KPK ordinance No. 11 of
2013. Case adjourned to 24-9-2013 for
written reply at Camp Court, D.I. Khan.

[Signature]
Registrar
Camp Court, D.I. Khan

Appellant deposited
Process fee & Security
Rs. 200/- Receipt
attached with file

I may kindly be
withdrew the appeal
as per instruction
24.9.2013

Counsel for the appellant, Mr. Farhaj Sinkandar, GP for
official respondents No. 1 to 3 and Naveed Zafar AAO for
respondent No. 4 present. The learned counsel for the appellant
requested for withdrawal of the appeal. The appeal is accordingly
dismissed as withdrawn, with no order as to costs. File be consigned
to the record.



ANNOUNCED withdrawal of the appeal. The appeal is accordingly
dismissed as withdrawn, with no order as to costs. File be consigned
to the record.

Member

Camp Court D.I. Khan

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 625/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/04/2013	<p>The appeal of Mr. Abdus Salam presented today by Mr. Muhammad Ismail Alizai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	19-4-2013	<p>This case is entrusted to touring Bench D.I.Khan for preliminary hearing to be put up there on <u>23-4-2013</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	23-4-2013.	<p><i>counsel for the appellant present and heard. The counsel contended that appellant has not been treated in accordance with Law. He has been dismissed from service on mere also false allegation of absence from duty. Points raised, need consideration. Admit subject to all just exceptions, including limitations. Process fee & security within 10 days be deposited - Thereafter, notices be issued to respondents for reply on 28-5-13 at Camp Court, D.I.Khan.</i></p> <p style="text-align: right;"><i>Member Camp Court, D.I.Khan</i></p>

Appellant deposited process fee and security in State Bank Challan placed on file

①

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 622 /2013.

Abdus Salam,

Appellant.

Versus

DG, Health Services, KPK, and others.

Respondents.

Service Appeal

I N D E X

<u>S.No.</u>	<u>Description of Documents</u>	<u>Annexure</u>	<u>Page.</u>
1.	Petition with Grounds of Appeal & affidavit.	--	02 — 04
2.	Copies of Appointment Order etc.	A	05 — 10
3.	Copy of Impugned Order.	B	— 11
4.	Copy of Departmental Appeal.	C	12 — 15
5.	Copy of Letter from respondent No.1.	D	16 — 19
6.	Vakalat-Nama	--	— 20

Dated 6.4.2013.

AS
(Abdus Salam) Appellant
Through Counsel

Muhammad Ismail Alizai
(Muhammad Ismail Alizai)
Advocate High Court, D.I.Khan.

In The Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Service Appeal No: /2013

622

705
9/4/13

Abdus Salam s/o Ali Hassan,
R/o Mohallah Dewan sahib, DIKhan City,
Ward Attendant, District Hqs; Teaching Hospital,
Dera Ismail Khan.

(Appellant).

Versus

1. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar,
2. Chief Executive, D.Hqs Hospital, D.I.Khan,
3. Medical Superintendent, D.Hqs Hospital, Dera Ismail Khan.
4. District Accounts Officer, Dera Ismail Khan,

(Respondents)

Note: The addresses given above are sufficient for the purpose of service upon respondents.

Filed to-
9/4/13

Appeal U/S 4 Of NWFP Service Tribunal Act, 1974 Against Order Dated 18.12.2012 Of Respondent No.3 Conveyed Through Office No.9840/PF dated 18.12.2012 & Finally Against Inaction By Respondents On Representation Dated 27.12.2012 Of Appellant.

- PRAYER: - By setting-aside the impugned Order of Respondent No.3, declaring the same as Illegal, Void ab-initio, Ultra-virus. Nullity in law and of no consequence on the status / rights of the appellant and thereby direct the respondents to desist from discriminating / disturbing the appellant in violation of law, rules & instructions / policy of Government,
- To graciously reinstate the appellant in service with grant of all back benefits as may accrue,
 - To kindly impose cost on respondents, as may graciously be fixed.

Handwritten signature

Respectfully Sheweth: -

The appellant very humbly submits as follows: -

BRIEF FACTS:

1. That the appellant was appointed as Cleaner under the control of respondents Nos. 1 to 3, latter adjusted against the post of Ward Attendant and lastly posted at District Hqs; Hospital, DIKhan under respondent No.3. Copies of appointment Order, Charge Report, Pay Rolls etc, are placed at Annexes-A to A/
2. That it was only for apparent personal grudge, political motivation and considerations on part of respondent No.3 that the appellant has been relieved of his position under the fake and false garb of departmental proceedings and has been deprived of his only source of earning through an order issued over No. 9840/PF dated 18.12.2013 passed by respondent No.3. Copy thereof is attached at Annex-B.
3. That the appellant was compelled to move a representation/ departmental appeal with respondent No. 1 against the apparent injustice. Though it was conveyed from the office of respondent No. 1 to respondent No.3 to withdraw the impugned order and proceed in the matter in accordance with the provisions of E&D Rules yet neither the order was withdrawn by respondent No.3 nor the representation / departmental appeal of the appellant was decided by respondent No.1 till date i.e expiry of limitation period, hence this petition. Copies of departmental appeal and the letter issued from office of respondent No.1 addressed to respondent No.3 are placed herewith at Annex-C & D, respectively. It may be worth mentioning that entire records are in possession of respondents and appellant has not been allowed any access nor copies of the same hence may be requisitioned from respondents during the course of hearing of instant appeal.
4. That having no other remedy available within departmental hierarchy the appellant approaches this Hon'ble Tribunal against the impugned order and inaction on appeal of appellant by the respondents on the grounds, inter-alia, following,

GROUND:

- i. That the order impugned hereby is inconsistent with law, rules and regulations in vogue thus, is liable to be declared as void ab-initio, nullity in law, illegal and ultra virus / inoperable against the rights of the appellant.
- ii. That the impugned order having caused grave miscarriage of justice to the appellant, potentially is likely to affect the appellant adversely without any lawful excuse if left non-rectified.
- iii. That the impugned order is devoid of any legal force and issued to the detriment of legitimate rights of the appellant thus, is not maintainable in law and is liable to be set-aside.
- iv. That the order of Respondents No.3, impugned hereby, is prejudicial to the terms and conditions of service and the rights of the appellant thus call for interference by this Hon'ble Tribunal.
- v. That in absence of any thing to justify dismissal of the appellant in terms of the law, rules & instructions of the government on holding of departmental proceedings against government/civil servants and for apparent Extraneous, Political motives & influence the impugned order could not either be justified nor sustained and allowed to continue & to operate against the constitutional rights of the appellant.

- vi. That the impugned order on dismissal of appellant & inaction on part of the respondents qua departmental appeal / representation of the appellant, being contrary to law, rules, regulations & instructions of the government *ab-initio*, ought be set aside & rectified in light of the principles as laid down by Hon`ble superior courts and Tribunals.
- vii. That the petition of appeal / appellant is duly supported by law, rules & instructions, besides the affirmation / affidavit annexed hereto.
- viii. That this Hon`ble Tribunal is competent and has ample powers to adjudge the matter and issue suitable orders in the ends of justice.
- ix. That the counsel for the appellant may very graciously be allowed to add to the grounds during the course of arguments, if need be.

PRAYER:

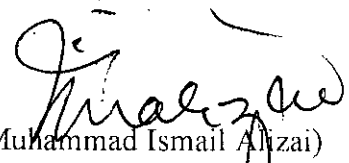
In view of the fore-given facts and grounds, it is requested that by setting-aside the impugned order of Respondents No.3, declaring same as illegal, void ab-initio, nullity in law and *ultra-virus* thus of no consequence on rights of the appellant, to kindly direct the respondents to desist from discriminating the appellant, desist from displacing the appellant through impugned order and to reinstate the appellant in service from the date of issuing of impugned order with allowance of all back benefits. Any other remedy deemed appropriate by the Hon`ble Tribunal in the circumstances of the matter is solicited, too.

Dated: 6.4.2013

Humbly,



(Abdus Salam) Appellant,
Through Counsel.



(Muhammad Ismail Alizai)
Advocate High Court, D.I.Khan.

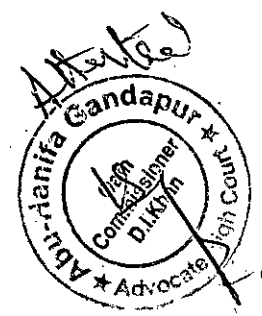
Affidavit.

I, Abdus Salam, the appellant herein, solemnly affirm and declare on oath that contents of the petition of appeal are correct to the best of my knowledge and belief and per official records and that nothing is willfully concealed or kept from the Tribunal.

Dated: 6.4.2013



Deponent.



8/14/13

OFFICE OF THE
MEDICAL SUPERINTENDENT
MUFTI MEHMOOD MEMORIAL
HOSPITAL, DERA ISMAIL KHAN.

5
A

No. _____ / _____ DATED
DIKHAN THE 01/02/2007

TO: Abdul Salam & A.L. Hassan
Rs. J. Khan

SUBJECT: OFFER OF APPOINTMENT

Memo:

The Govt hereby offers you a post of cleaner against the existing vacancy at MUFTI MEHMOOD MEMORIAL HOSPITAL, DIKHAN on Fixed Charges Basis @ Rs. 4000/- PM.

1. Your appointment in Health Department is purely on Fixed Basis and your services are liable to be terminated at any time without giving notice or assigning irrespective of the facts that you may belong to a post other than one to which you are recruited.
2. You have to join duty at your own expenses in case you wish to resign at any time one-month notice will be essential or in lieu thereof one month pay shall be forfeited.
3. You will be governed by such rules and orders relating to leave, TA, Medical charges as may be issued by the Govt. from time to time for the category of Govt. servant to which you may belong.
4. If you accept the offer on the above noted conditions you should report to medical Superintendent, MMH Hospital, DIKhan for further duty within seven days of the receipt of this letter, failing which your services will be terminated.
5. You will produce Medical Fitness Certificate from Medical Superintendent, Mufti Mehmood Memorial Hospital, DIKhan.

MEDICAL SUPERINTENDENT
MUFTI MEHMOOD MEMORIAL
HOSPITAL, DERA ISMAIL KHAN.

No. 251 - 55

Copy forwarded to the:-

1. District Accounts Officer, DIKhan.
2. Head Clerk of this office.
3. Accounts Officer of this office.
4. Account Clerk of this office.

For information & n/action.

[Signature]
MEDICAL SUPERINTENDENT
MUFTI MEHMOOD MEMORIAL
HOSPITAL, DERA ISMAIL KHAN.

[Handwritten notes]
11/11/07
JUE

6

**OFFICE OF THE MEDICAL SUPERINTENDENT
MMM TEACHING HOSPITAL DERA ISMAIL KHAN**

Office Order

Mr. Abdul Salam Sweeper attached to MMM Teaching Hospital DIKhan is hereby adjusted / posted against the post of Ward Attendant on the same term and condition with immediate effect in the interest of public service.

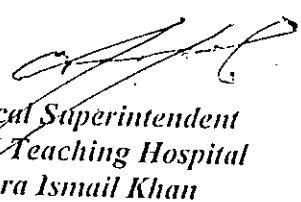
*Medical Superintendent
MMM Teaching Hospital
Dera Ismail Khan*

No. 1861-6312-8 Dated DIKhan the 9/4/2008

Copy to the:

1. District Accounts Officer DIKhan
2. Deputy Medical Superintendent MMM Teaching Hospital DIKhan
3. Accounts Clerk of this office
4. Official concern

for information and necessary action.


*Medical Superintendent
MMM Teaching Hospital
Dera Ismail Khan*

⑦ بحسب حساب اہم میں ہر صنفی محمودیہ
دہائیوں کا
صنات عالی

مردمانہ گزارشی کہ بندہ آج دہائی ہر عام
پورے پورے پورا پورے پورے پورے
پورے پورے پورے پورے پورے

العارضی

1007

فردوس عبداللہ و کدر علی حسن محلہ دیوان علی

دستخط عبد اللہ امجدی

Name of Official: *Mr. ABDEL KADIR*

Caste or Race: *Rajput*


Father's Name: *Ali Hassan*

Residence: *House no. 9/1489, P. S. ...*

Date of Birth: *25-12-1938 (12-01-1939)*

Exact height by measurement:

Personal marks of identification: *As per ...*

Signature of the Official: 

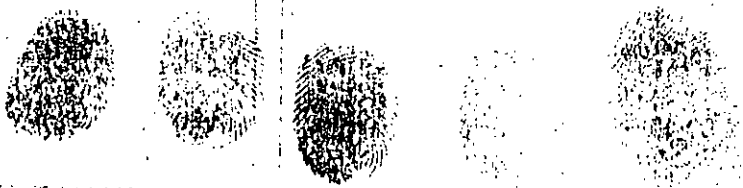
Signature of

head of office

Sd/-

I do hereby certify that I have examined *Abd. Kadir* a candidate for employment in the *... Dept.* and can not discover that he is suffering from any physical infirmity or bodily infirmity except *Nil*

I do not consider this as disqualification for employment in the *... Dept.* as his age according to his own statement is *19* years and by appearance about *19* years



LEFT HAND THUMB AND FINGER IMPRESSIONS: *Nil*

CO. ...
Medical Superintendent
Military ...
Recd. ...



GOVERNMENT OF PAKISTAN

ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA Month: November 2012

9

DISTRICT

DI4200 - MEDICAL SUPERINTENDENT/DHO HO

Pers # E-200356964 PAY ROLL SYSTEM: Sub: Health

Min: Health

Name: ABDUL SALAM
Dsg.: WARD ATTENDANT
NIC No.: 1210102502207
CPF Interest Free

NTN:
CPF #:
Old #:

BPS01 Regular / Contract

DEPTT CODE DI4200 -

PAYS AND ALLOWANCES:

0001-Basic Pay	5,400.00
1000-House Rent Allowance	891.00
1210-Convey Allowance 2005	1,500.00
1300-Medical Allowance	1,000.00
1948-Adhoc Allowance 2010@ 50%	1,620.00
1970-Adhoc Relief Allow 2011	486.00
2118-Adhoc Relief Allow (2012)	1,080.00
Gross Pay and Allowances	11,977.00

DEDUCTIONS:

CPF Balance 28,080.00	Subrc: 312.00
3501-Benevolent Fund	120.00
3511-Addl Group Insurance	3.00
3604-Group Insurance	58.00
Total Deductions	493.00
	11,484.00

D.O.B

LFP Quota:

05.01.1988

N.B.P.TIGARAT GANJ DN.B.P.TIGARAT GANJ D

05 Years 08 Months 002 Days

2674-8

Government Contribution To CPF :

312.00

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON

NET AMOUNT PAYABLE



GOVERNMENT OF PAKISTAN

ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA

Month: December 2012

10

S#:

DISTRICT

DI4200 - MEDICAL SUPERINTENDENT DHO HO

Pers # 00356984 PAY ROLL SYSTEM

Min: Health

Name: ABDUL SALAM
Dsg.: WARD ATTENDANT
MC No.: 1210102502207
CPF Interest Free

NTN:
CPF #:
Old #:

BPS01 Regular / Contract

DEPTT CODE DI4200 -

PAYS AND ALLOWANCES:

0001-Basic Pay	3,044.00
1000-House Rent Allowance	489.00
1210-Convey Allowance 2005	823.00
1300-Medical Allowance	548.00
1948-Adhoc Allowance 2010@ 50%	888.00
1970-Adhoc Relief Allow 2011	267.00
2118-Adhoc Relief Allow (2012)	609.00
Gross Pay and Allowances	6,668.00

DEDUCTIONS:

CPF Balance 28,704.00	Subrc:	312.00
3501-Benevolent Fund		132.00
3511-Addl Group Insurance		3.00
3604-Group Insurance		64.00
Total Deductions		511.00
		6,157.00

D.O.B

LFP Quota:

05.01.1988

N.B.P.TIGARAT GANJ DN.B.P.TIGARAT GANJ D

05 Years 09 Months 003 Days

2674-8

Government Contribution To CPF :

312.00

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON

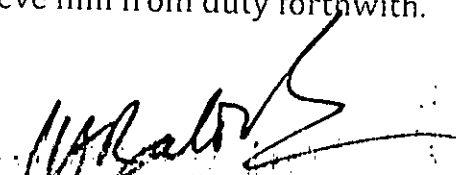
Office of the Medical Superintendent
DHQ Teaching Hospital DIKhan

No. 9840 171-

Dated 18/12/2012

Office Order

1. Abdul Salam, Ward Orderly was reported absent by incharge Class-IV. The competent authority initiated an inquiry under Khyber Pakhtunkhwa Govt Servants (Efficiency & Disciplinary) Rules 2011.
2. The inquiry Officer found him that:-
 - 1) He is habitual absentee, late comer and in habit of disappearance during duty hours without any information.
 - 2) His service record is blemished one.
 - 3) He has confessed his absence, which is tantamount to misconduct.
 - 4) He is somewhat arrogant and irresponsible.
3. Notice was served upon him to show cause why he should not be dismissed from service. He was to submit reply to the show cause notice, but he has failed to comply with the order.
4. As already observed the charges are established against him, I Dr. Khalid Aziz Baloch, Medical Superintendent/ competent authority hereby dismiss Abdul Salam Ward Orderly from service with effect from 18/12/12. The establishment Clerk is directed to relieve him from duty forthwith.


Dr. Khalid Aziz Baloch
Competent Authority.

12

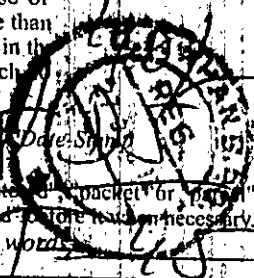
No. 881

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which
acknowledgment is due.

Rs. Ps.

Received a registered
addressed to _____

Date: _____



Initials of Receiving Office _____

Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before each, as necessary.

Insured for Rs. _____ (in figures)

(in words)

Insurance fee Rs. _____

Weight _____
(in words)

Kilo
Gram

Name and
address
of sender

A. P. K. 19
27/12

13



دستخط

RP-54

رجسٹر یا بیجنہ نیچے والے کو پختہ کر دینے کے پتہ پر واپس بھیجا جائے۔

★ ایک رجسٹری

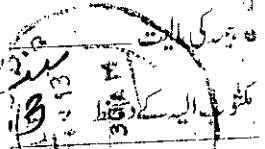
نمبر

برائے (نام)

وصول پائی۔

طیبر الہی
ع/ہ
تاریخ تقیسی
۱۵/۱۱

وزن (ظنون میں)



پوسٹ کی ایت

مکتوب الیہ کے دائرے

★ یہاں چھٹی ٹیکٹ لگاؤ۔
پتہ یا پارسل جو چیز ہو تحریر کریں۔ اس میں لفظ "پتہ" لکھ کر تحریر کریں۔
صرف پتہ میں یہاں اندراج کیا جائے۔ بصورت دیگر ٹیکٹ لگا دیا جائے گا۔

قیمت: پانچ روپے - Rs. 5/-

ACKNOWLEDGEMENT DUE CARD



نام ~~ڈی ڈی سٹریٹنگ انڈسٹریز آفیس~~
~~ڈی ڈی سٹریٹنگ انڈسٹریز آفیس~~
عمرہ اسماعیل خان
ضلع ~~ڈی ڈی سٹریٹنگ انڈسٹریز آفیس~~
ڈی ڈی سٹریٹنگ انڈسٹریز آفیس

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(پوسٹ کوڈ لکھنا نہ بھولیں)

1. KHAN CITY S.O.
ڈی ڈی سٹریٹنگ انڈسٹریز آفیس

خدمت جناب ڈائریکٹر جنرل تعلیم و تربیت، حکومت پنجاب، لاہور

C
=

درخواست انجمنہ اہل نابت منگوانی آڈر نمبر 9890/PE مورخہ 18/12/2012
ایم ایس ڈی ایچ کونسلور سنیٹل ڈیپارٹمنٹ، سنیٹل خانہ، سوال جو خانے سے
سپریشن سائل بطور وارڈ اردو

سنیٹل خانہ عالی :- سائل حسب ذیل (مطلوبہ سائل) ہے۔

1- یہ کہ من سائل رہائشی دستاویزوں کے بارے میں سنیٹل خانہ عالی سے
اور من سائل کو برائے آڈر نمبر 251-256 مورخہ 11-2-2007 سے
ایم ایس ڈی ایچ کونسلور سنیٹل ڈیپارٹمنٹ، سنیٹل خانہ، سوال جو خانے سے
نقل آڈر نمبر 11-2-2007 ہے۔

2- یہ کہ من سائل کو ایچ ایچ ای اور ایچ ای ڈی کے بارے میں آڈر
نمبر 1861-83 مورخہ 9-4-2008 بطور وارڈ اردو، انڈسٹریل سنیٹل خانہ
نقل کیا گیا ہے۔

3- یہ کہ من سائل کی سنیٹل خانہ عالی سے ڈی ایچ ای کے بارے میں
ڈیپارٹمنٹ سنیٹل خانہ عالی سے سنیٹل خانہ عالی سے سنیٹل خانہ عالی سے
ڈیپارٹمنٹ سنیٹل خانہ عالی سے سنیٹل خانہ عالی سے سنیٹل خانہ عالی سے

4- یہ کہ من سائل نے ایچ ای ای کے بارے میں سنیٹل خانہ عالی سے
عدالت سے کام نہیں لیا۔ مذکورہ آڈر نمبر 9890/PE مورخہ 18/12/2012
من گھڑے جانے والے اعتراضات کے بنیاد پر سنیٹل خانہ عالی سے سنیٹل خانہ عالی سے

5- یہ کہ من سائل ایک ابتدائی شریب نورد ہے اور کوئی دیگر ذرا سائل

نہیں ہے۔ جنتیف العمر والذین اور جو جوئے کھونے میں فعال ہیں۔

6- سائل کے مغربی / Dismiss احکامات مورخہ 18/12/2012

سیراٹر علیہ میں - حادثہ من سائل کو کوئی مشورہ کارڈ نہیں

دیا گیا - اور نہ ہی من سائل نے جو ان مشورہ کارڈ دیا تھا -

جلد سبزی من اوقاف اور بے پیمانہ ہے

7- من سائل اور سائل کے والدین کے حال میں اہم و اہم فرمانا ہے

اور حکم مورخہ 18/12/2012 کے آرڈر کو منسوخ کر کے سائل کو

دوبارہ بحال فرمانا چاہئے -

لئے من سائل کے مورخہ 18/12/2012 آرڈر اس میں ایچ ایچ

محمد رسول اللہ صلی اللہ علیہ وسلم نے فرمایا ہے کہ سائل کو دوبارہ بحال وارڈ اری بحال
فرمایا جائے

27-12-2012

الاعتماد

عبد السلام ولد علی حسن قوم راجسوت سکندر محمد اور ذرا سائل اور ذرا سائل

AK

(1) DCHS 3005956912

OFFICE OF THE PRINCIPAL GOMAL MEDICAL COLLEGE
DERA ISMAIL KHAN



No. 55-58 /Est./E-7 Dated DIKhan the: 03/01/2013
Tel: Phone No. 9280338-39-41 Fax# 9280340 Email: gmc.principal@yaho.com

To

The Medical Superintendent
DHQ Teaching Hospital DIKhan

Subject:

Application in respect of Mr. Abdul Salam Ward Orderly

Enclosed please find herewith a copy of application in respect of Mr. Abdul Salam Ward Orderly attached to DHQ Teaching Hospital DIKhan regarding (dismiss from service) office order issued by your office vide No. 9840/PF dated 18/12/2012. Kindly furnish your view comments for further proceeding.

Moreover the said office order issue by yourself without any endorsement of the undersigned as well as others.

*Chief Executive/Principal
DHQ/MMM Teaching Hospital/
Gomal Medical College
Dera Ismail Khan*

Cc:

1. The Secretary to Government of Khyber Pakhtunkhwa Health Department
2. The Director General Health Services Khyber Pakhtunkhwa Peshawar
3. Official concerned.

*Chief Executive/Principal
DHQ/MMM Teaching Hospital/
Gomal Medical College
Dera Ismail Khan*

Office of the Medical Superintendent
DHQ Teaching Hospital DIKhan

No. 63-67

Dated 04/01/2013

Office Order

With reference to Chief Executive DHQ Teaching Hospital Dera Ismail Khan vide letter No. 55- 58/ E-7 dated 03/01/2012 and the undersigned personally checked the case in respect of Abdul Salam Word Orderly, due to his personal grudges with the Enquiry Officer as well as Medical Superintendent DHQ Teaching Hospital DIKhan, the Office Order regarding dismissal from Service was issued vide No. 9840/PF dated 19/12/2012.

The said Office Order vide No 9840/PF dated 19/12/2012 is hereby withdrawn and the Services of Mr. Abdul Salam Word Orderly is hereby reinstated with effect from 18/12/2012 in the best interest of Public Service.

M. A. P. Khan
4/1/2013
Medical Superintendent
DHQ Teaching Hospital
Dera Ismail Khan

Cc:

1. The Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. The Chief Executive DHQ Teaching Hospital DIKhan
3. The District Accounts Officer DIKhan
4. Accounts Section DHQ Teaching Hospital DIKhan
5. Official Concerned

M. A. P. Khan
4/1/2013
Medical Superintendent
DHQ Teaching Hospital
Dera Ismail Khan

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FAX NO. :

Aug. 31 2000 07:14PM F1

Reminder



DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR.
NO. 443 /PERSONNEL
DATED 28 /01/2013.

To,

The Medical Superintendent
DHQ Teaching Hospital
D.I Khan.

Subject:
Dear Sir,

APPLICATION FOR RE-INSTATEMENT.

I am directed to refer to this Directorate letter No.267/Personnel dated 08.01.2013, on the subject noted above.

Please furnish your comments in this regard urgently, so as to proceed further in the matter.

ASSISTANT DIRECTOR (P-II)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR

23-1-2013



(19)

DIRECTORATE GENERAL HEALTH
SERVICES, GOVT: OF KHYBER
PUKHTUNKHWA, PESHAWAR.
NO. 1176 /PERSONNEL
DATED 11 /03/2013.

To,

The Medical Superintendent
DHQ Teaching Hospital
D.I Khan.

Subject: **APPLICATION FOR RE-INSTATEMENT.**
Dear Sir,

I am directed to refer to your office order bearing Endst: No. 9840/PF dated 18.12.2012, and letter No. 454/PF dated 21.01.2013, on the subject noted above.

You are requested to withdraw the termination order of Mr. Abdul Salam Ward orderly attached to DHQ Hospital D.I Khan and also prepare draft charge sheet and statement of allegation against the above named Ward orderly and submit to this Directorate, so as to proceed further in the matter.

ASSISTANT DIRECTOR (P-II)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR

WIP
11-3-2013

Hafiz S.M Ali Shah

① خلیفہ نوٹس / البیہشتی کا

سکرٹار عام حضرت سے برخواست کیا

② انہی ذاتی معاملات کے پیشے صلیفہ یاغی دالہ

رہنے میں باوجود کہ الہ سے معلوم

کے مطابق نہ تھا چنانچہ سکرٹار عام حضرت فتم

کرتے مروض کیا

③ خلیفہ اشتہار احمد لہندہ اخبار نوٹس

کے لیے یاغی لاکھ سے میں کیے اور کتا

کو کلاس قدر کسی حدت مروض کیا

④ مکتبہ الام ایسی طالعہ بھارتی

نہیں کیا اسم ذمہ دار صبح کا غیر مکتبہ

پر مکتبہ کیا بلکہ حدت مکتبہ کا حق

اس مکتبہ کا

وکالت نامہ

قیمت ایک روپیہ		کورٹ فیس
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بعد ازاں خطاب
 سوسائٹی کے سربراہان و ممبران
 منجانب ان کے
 عبدالرحمن صاحب
 دعویٰ یا جرم
 تفصیل دعویٰ یا جرم
 سال 2013

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہ سے برائے پیشی یا تصفیہ مقدمہ مندرجہ بالا کیلئے

کو حسب ذیل شرائط پر قبول فرمایا ہے کہ میں ہر کوئی پر خود بخود کوئی اختیار خاص رد و عدالت حاضر ہوتا ہوں گا اور ہر وقت ہمارے جانے مقدمہ وکیل صاحب موصوف کا اطلاع دیکر حاضر عدالت کروں گا، اگر کوئی پر مٹھ کر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ داری نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بعد از تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بعد از تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر مقام پکھری کے علاوہ اور جگہ باعث ہونے یا بعد از تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مٹھ کر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عطا نہ دلائیں کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخست صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ یا جواب دعویٰ یا درخواست اجراءے ڈگری و نظر ثانی اپیل و جرم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرنے اور جرم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور جرم کے بیان دینے اور اس پر تاشی یا راضی نامہ و فیصلہ بر حلف کرنے، اقبال و کوئی کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ میرا ان پکھری صدر بیرونی مقدمہ مذکورہ نظر ثانی و اپیل و گرانہ ویر آمدگی مقدمہ یا منوشی ڈگری یا طرف یا درخواست حکم انتہائی یا ترقی یا گرفتاری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا کی علیحدہ جگہ بیرونی کا اختیار ہوگا اور تمام ساختہ پر داخست صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گرانہ یا دیگر معاملہ مقدمہ مذکورہ کسی اور سے وکیل یا پھر سزا کا پانے بجائے یا اپنے ہر کوئی مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دینی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التواء ہوگا، وہ صاحب موصوف کا حق ہوگا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے تاکہ مندرجہ
 مورخہ 6 مارچ 2013

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد العبد العبد

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Accepted
 for the purpose of
 the case

5/4/2011