

## FORM OF ORDER SHEET

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

C.O.C application No.                      603/2022

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1     | 12/10/2022                | <p>The C.O.C application of Dr. Jamil Ahmad submitted today by Mr. Ali Zaman Advocate. Original file be requisitioned. It is fixed for hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;">REGISTRAR</p> |

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

COC No. 603 /2022

Dr. Jamil Ahmad S/O Abdullah R/O Mohallah Amir Abad ,  
village Balogram Tehsil Babuzai District Swat.

(Appellant)

**VERSUS**

Govt Khyber Pakhtunkhwa, through Chief Secretary, Khyber  
Pakhtunkhwa Peshawar and others.

(Respondents)

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**Appellant / Petitioner**

Through

**ALI ZAMAN**

**ABDUL SAMAD DURRANI**

&

**SHAHZAD SHAHID BALOCH**

Advocates Peshawar

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

COC No. 603/2022  
IN  
Appeal No: 917/2022

1567  
12-10-2022

Dr. Jamil Ahmad S/O Abdullah R/O Mohallah Amir Abad ,  
village Balogram Tehsil Babuzai District Swat.

(Applicant)

VERSUS

1. Amir Sultan Tareen Secretary Health Of Khyber Pakhtunkhwa, Health Department, Civil Secretariat, Peshawar.
2. Dr. Shaheen Afridi Director General Health Services, Government of Khyber Pakhtunkhwa, Peshawar.
3. Mr. Shahkeel Ahmad Minister of Public Health Government Of Khyber Pakhtunkhwa.

Contemnor/Respondents)

**APPLICATION FOR INITIATING CONTEMPT**  
**OF COURT PROCEEDING AGAINST**  
**RESPONDENTS FOR DISOBEYING THE**  
**ORDER DATED 15<sup>th</sup> JUNE, 2022 AND 04<sup>th</sup> JULY**  
**2022 AS WELL AS 6<sup>TH</sup> SEPTEMBER 2022 OF**  
**THIS HON'ABLE COURT.**

**Respectfully Submitted:**

1. That the petitioner filed service appeal No.917/2022 against the notification No, SOH (E-V)/4-4/2022 dated 18-05-2022 which is pending before this Hon'able Court as well as the pervious contempt Petition is also pending and fixed for 14-10-2022.
2. That after hearing the arguments, this Honourable Tribunal has admitted the service appeal and also suspend the operation of impugned notification No. SOH (E-V)/4-4/2022 dated 18-05-2022 and directed the Respondents not to make any kind of hindrance in the performance of the duties of the Appellant/Applicant. (Copies of the Orders Dated 15th June, 2022, 04th July, 2022 and 06<sup>th</sup> September 2022 are attached as Annexure A).

3. *That despite of the fact, the Appellant/Applicant has submitted the attested photocopies of the above mentioned orders, but the Respondents are reluctant to obey the orders/directions of this Honourable Tribunal, hence the instant petition.*
4. *That on dated 04-10-2022, the Respondent No 2 has issued Notification No. SOH(E-V) 4-4/2022 , in serial no 2 the Appellant/ Applicant transfer from Directorate General health Services, Khyber Pakhtunkhwa To District Health Officer (BS-20), Torgar in OPS. Vice S.No. 01, thereafter issued a second Notification No. SOH (E-V)/ 4-4/ 2022, Dated: 06-10-2022 in Serial No. 2 the Appellant / Petitioner transferred from the seat of Medical Superintendent DHQ Hospital, Batkhela Malakand To District Health Officer (BS-20), Torgar in OPS. Vice S.No. 01, which is self explanatory and against the directions of this Honourable Tribunal. (Copies of the Notifications Dated 04-10-2022 & 06-10-2022 are attached as Annexure B).*
5. *That despite having knowledge about the above referred orders; the Respondents hurriedly not considering the Appellant/Petitioner and in this way flagrantly violated again and again continuously all the orders of the Honourable Tribunal.*
6. *That the Respondents had intentionally committed the contempt of Court by continuously and again and again violating the orders passed by this Honourable Tribunal, therefore, this Honourable Tribunal requested to initiate appropriate action against Respondents.*

7. That the Respondents are liable to be treated with iron hands and given exemplary punishment, so that it may serve as deterrent for the likeminded person, that leniency shown by this Honorable Tribunal has been mis construed and mis understood rather the contemptners have got to encourage and too berserk to obey the Court Orders, so it is the cry of the hour that the violators must be brought to the dock and given deterrent punishment according to law.
8. That petitioner seeks leave of the Honorable Tribunal to argue additional grounds at the time of arguments if need be.

It is therefore prayed that on acceptance of this application, an appropriate action may kindly be initiated against respondents for continuously, again and again disobeying the orders of this Honorable Tribunal Dated 15-06-2022, 04-07-2022 and 06.09.2022 passed by this Honorable Tribunal.

Any other relief, which deems proper in the matter, may kindly be passed against the respondents in favour of Appellant/Petitioner.

Appellant/Petitioner

Through

Ali Zaman

Abdul Samad Durrani

&  
Shahzad Shahid Baloch

Advocates Peshawar

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

COC No. \_\_\_\_\_/2022  
IN  
Appeal No:917/2022

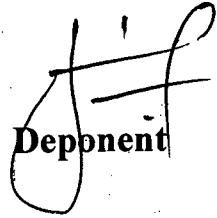
Dr. Jamil Ahmad

**VERSUS**

Secretary Health Of Khyber Pakhtunkhwa & Others

**AFFIDAVIT**

*I, Dr. Jamil Ahmad S/O Abdullah R/O Mohallah Amir Abad , village Balogram Tehsil Babuzai District Swat, do hereby solemnly affirm and declare that the contents of the above Contempt Petition are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honorable Tribunal.*

  
Deponent



12/10/22

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

- COC No. \_\_\_\_\_/2022

Dr. Jamil Ahmad S/O Abdullah R/O Mohallah Amir Abad ,  
village Balogram Tehsil Babuzai District Swat.

(Applicant)

**VERSUS**

Govt Khyber Pakhtunkhwa, through Chief Secretary, Khyber  
Pakhtunkhwa Peshawar and others.

(Respondents)

**APPLICATION FOR SUSPENSION OF THE  
IMPUGNED NOTIFICATIONS NO. SOH(E-V)/4-  
4/2022, DATED 04-10-2022, & NOTIFICATION NO.  
SOH(E-V)/4-4/2022, DATED 06-10-2022 TILL THE  
FINAL DISPOSAL OF THE INSTANT APPEAL.**

**Respectfully Submitted:**

1. *That the appellant/ Petitioner has filed the accompanied Contempt Petition in which no date has been fixed so far.*
2. *That all the grounds raised in the main appeal may kindly be considered as part and parcel of the instant application.*
3. *That the appellant/ Petitioner has Prime facie and arguable case, and balance of convenience also lie in favor of the appellant/applicant.*
4. *That if the impugned notifications are not suspended, the applicant/appellant will suffer irreparable loss, which cannot be compensated in terms of money or else.*

5. That valuable rights of the applicant/appellant are involved in the case hence the instant application may be allowed, in best interest of the justice.

It is, therefore, prayed that on acceptance of this application the order of the impugned Notifications may kindly be suspended till final disposal of the Appeal.

**Applicant/ Appellant**

Through

ALI ZAMAN

ABDUL SAMAD DURRANI

&

SHAHZAD SHAHID BALOCH

Advocates Peshawar

**AFFIDAVIT**

I, Dr. Jamil Ahmad S/O Abdullah R/O Mohallah Amir Abad , village Balogram Tehsil Babuzai District Swat, do hereby solemnly affirm and declare that the contents of the above application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



Deponent

12/10/22

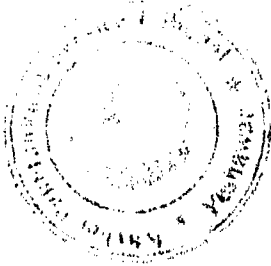


ATTESTED  
Ali Arshad Khan  
Associate  
High Court  
Signature A

7

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

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Addl: AG present.



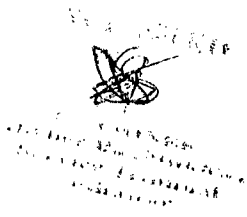
None for the respondents present nor their written reply/comments have been submitted till date. Learned counsel for the appellant submits that the department had not taken any action on the order of this Tribunal, passed on 05.06.2022, suspending the operation of the impugned order of transfer of the appellant, to which a query was placed before the learned counsel for the appellant whether the appellant had relinquished charge of the post. the reply of learned counsel for the appellant was that the appellant had not yet relinquished the charge of the post from where he was transferred. It is, therefore, directed that the respondents shall not make any hindrance in the performance of the duties of the appellant because the operation of impugned order of transfer has already been suspended through order of this court, which further stands suspended. Respondents are directed to submit written reply/comments on the next date To come up for further proceedings on 27.07.2022 before S.B.

(Kalim Arshad Khan)  
Chairman

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

Today learned counsel for the appellant submitted an application for impleadment of one Dr. Irfan-ud-Dir as respondent.

File was requisitioned on the request of learned counsel for the appellant. Notice of application be given to Dr. Irfan-ud-Din for the date already fixed.



(Kalim Arshad Khan)  
Chairman

15<sup>th</sup> June, 2022

Counsel for the appellant present.

Appellant is aggrieved of order dated 18.05.2022. whereby the appellant was transferred without completion of tenure from M/S DHQ Hospital Batkhela and was directed to report to Directorate General Health Services, Khyber Pakhtunkhwa. He submitted departmental appeal on 24.05.2022 which was regretted on 14.06.2022. It is contended that just 09 months before the appellant was transferred and posted as M/S DHQ Hospital Batkhela. Thus the impugned posting/ transfer order was against the posting/transfer policy of the government. Let the appeal be admitted to full hearing.

As to the application for suspension of the operation of the impugned order, it is directed that operation of the impugned order shall stand suspended to the extent of appellant till the date fixed subject to notice to the other side. The appellant is directed to deposit security and process fee within 10 days. To come up for written reply/comments on 04.07.2022.

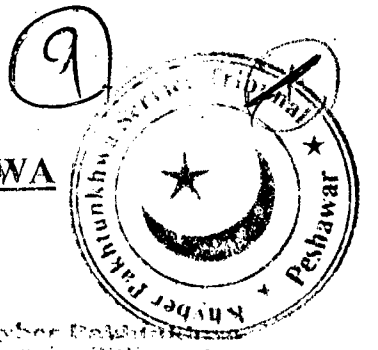
(Kalim Arshad Khan)  
Chairman

Rs-500  
APPELLANT DEPOSITED  
SECURITY & PROCESS FEE

A. Arshad  
16/6/22

APPELLANT  
M/S DHQ HOSPITAL  
BATKHELA  
KHYBER PAKHTUNKHWA

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**



COC No. 520/2022  
IN  
Appeal No: 917/2022

Khyber Pakhtunkhwa  
Service Tribunal  
Case No. 1166  
Dated 06/9/2022

Dr. Jamil Ahmad Medical Superintendent (BS-19) DHQ  
Hospital Batkhela Malakand S/O Abdullah R/O Mohallah Amir  
Abad , village Balogram Tehsil Babuzai District Swat.

(Applicant)

**VERSUS**

1. Amir Sultan Tareen Secretary Health Of Khyber  
Pakhtunkhwa, Health Department, Civil Secretariat,  
Peshawar.
2. Dr. Shaheen Afridi Director General Health Services,  
Government of Khyber Pakhtunkhwa, Peshawar.
3. Mr. Shahkeel Ahmad Minister of Public Health Engineering  
Government Of Khyber Pakhtunkhwa.


(Contemnor/Respondents)

**APPLICATION FOR INITIATING CONTEMPT OF  
COURT PROCEEDING AGAINST RESPONDENTS FOR  
DISOBEYING THE ORDER DATED 15<sup>th</sup> JUNE, 2022  
AND 04<sup>th</sup> JULY 2022 OF THIS HON'ABLE COURT.**

**Respectfully Submitted:**

1. That the Pétitioner filed service appeal No.917/2022 against  
the Notification No, SOH (E-V)/4-4/2022 dated 18-05-2022  
which is pending before this Hon'able Court and fixed for  
14-09-2022.

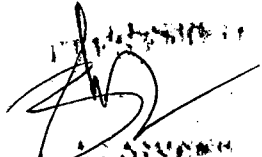
**ATTESTED**  
  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

(10) 

2. That after hearing the arguments, this Honourable Tribunal has admitted the service appeal and also suspend the operation of impugned Notification No. SOH (E-V)/4-4/2022 dated 18-05-2022 and directed the Respondents not to make any hindrance in the performance of the duties of the Appellant/Petitioner. (Copies of the orders dated 15th June, 2022 and 04th July, 2022 are attached as Annexure A).

3. That despite of the fact, the Appellant/Petitioner has submitted the attested photocopies of the above mentioned orders, but the Respondents are reluctant to obey the orders/directions of this Honourable Tribunal, hence the instant petition.

4. That on dated 05-09-2022, the Respondent No 2 has issued again the same notification No. SOH(E-V) 4-4/2022 , in serial no 2 the appellant/Petitioner transferred from the seat of Medical Superintendent DHQ Hospital Batkhela Malakand to Directorate General Health Services, Khyber Pakhtunkhwa, which is self explanatory and against the directions of this Honourable Tribunal. (Copy of the Notification Dated 05-09-2022 is attached as Annexure B).

  
Secretary  
Khyber Pakhtunkhwa  
Government  
Peshawar

(11)  
(B)

5. That despite having knowledge about the above referred orders; the Respondents hurriedly not considering the Petitioner /Appellant and in this way flagrantly violated both the orders of the Honourable Tribunal besides that the Respondent No. 4 having political influence upon the Respondents No. 1 & 2 has directed them to issue the same impugned notification again and invaded the Hospital with the help of other persons and harass the petitioner /appellant with the quarrel as well as hostage the all employees of the Hospital illegally unlawfully.

6. That in this regard the members of the Grand Health Alliance DHQ Hospital Batkhela submitted report to the Deputy Commissioner/ Commandant MKD Levies Malakand against the behavior of the Respondent No. 4 and interference in the official work and record their protest and demand an inquiry in the matter. (Copies of Report to Deputy Commissioner and other newspaper cuttings attached as Annexure C)

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

7. That the Respondents had intentionally committed the contempt of Court by violating the orders passed by this Honourable Tribunal, therefore, this Honourable Court requested to initiate appropriate action against Respondents and they are liable to exemplary punished.

19  
24

8. That any other ground will be raised at the time of arguments with prior permission of this Hon'able Tribunal.

It is therefore prayed that on acceptance of this application, an appropriate action may kindly be initiated against respondents for disobeying the orders of this Hon'able Tribunal dated 15-06-2022 and 04-07-2022 passed by this Hon'able Court.

Any other relief, which seems proper in the matter and not specifically asked, may kindly be passed against the respondents in favour of Appellant/Petitioner.

Petitioner/Appellant

Through

  
ALI ZAMAN

  
ABDUL SAMAD DURRANI

  
& SHAHZAD SHAHID BALOCH  
Advocates Peshawar

#### AFFIDAVIT

I, Dr. Jamil Ahmad Medical Superintendent (BS-19) DHQ Hospital Batkhela Malakand, do hereby solemnly affirm and declare that the contents of the instant petition are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



DEPONENT

ATTESTED

  
ATTESTER  
Peshawar

(13)

*[Signature]*

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

COC No. \_\_\_\_\_/2022

IN

Appeal No:917/2022

Dr. Jamil Ahmad Medical Superintendent (BS-19) DHQ  
Hospital Batkhela Malakand.

(Appellant)

VERSUS

Govt Khyber Pakhtunkhwa, through Chief Secretary, Khyber  
Pakhtunkhwa Peshawar and others.

(Respondents)

**APPLICATION FOR SUSPENSION OF THE  
IMPUGNED NOTIFICATION NO. SOH(E-V)/4-  
4/2022, DATED 05-09-2022, TILL THE FINAL  
DISPOSAL OF THE INSTANT APPEAL.**

**Respectfully Submitted:**

1. *That the appellant has filed the accompanied service appeal which has been fixed for hearing on 14-09-2022.*
2. *That all the grounds raised in the main appeal may kindly be considered as part and parcel of the instant application.*
3. *That the appellant has Prime facie and arguable case, and balance of convenience also lie in favor of the appellant/applicant.*
4. *That if the impugned notification is not suspended, the applicant/appellant will suffer irreparable loss, which cannot be compensated in terms of money or else.*

ATTESTED

*[Signature]*  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

14

5. That valuable rights of the applicant/appellant are involved in the case hence the instant application may be allowed, in best interest of the justice.

It is therefore prayed that on acceptance of this application the order of the impugned Notification may kindly be suspended till final disposal of the Appeal.

**Applicant/ Appellant**

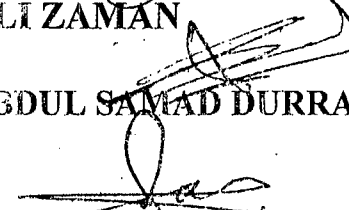
Through



**ALI ZAMAN**

**ABDUL SAMAD DURRANI**

&

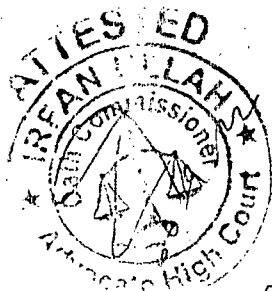


**SHAHZAD SHAHID BALOCH**

Advocates Peshawar

**AFFIDAVIT**

I, Dr. Jamil Ahmad Medical Superintendent (BS-19) DHQ Hospital Batkhela Malakand, do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



**DEPONENT  
ATTESTED**

**EXAMINER  
Shahzad Shahid Baloch  
Advocate Peshawar**

88-9-22/

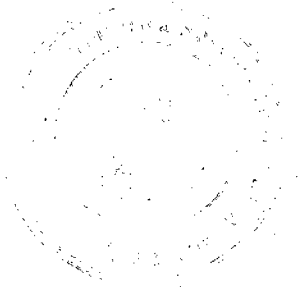


6<sup>th</sup> September, 2022

Petitioner along with his counsel present.

This is an application for initiating contempt proceedings against the respondents made party in the application for violation of the orders of the Tribunal passed on 15.06.2022 and 04.07.2022. It is submitted by the learned counsel that vide notification No. SOH(I-V) 4-4/2022 dated 26.07.2022, in compliance with the directions of the Tribunal the notification of transfer in respect of Dr. Jamil Ahmad was suspended till the final decision of the Tribunal but again vide notification No. SOH(I-V) 4-4/2022 dated 05.09.2022, the petitioner was transferred and Dr. Irfan Ud Din was posted against his post. Let notice of this application be given to the respondents to show cause as to why they should not be proceeded under the relevant law.

In the meanwhile the operation of the order dated 05.09.2022 shall remain suspended to the extent of the petitioner and Dr. Irfan Ud Din. To come up for further proceedings on 27.09.2022 before S.B.



*(Handwritten mark)*

(Kalim Arshad Khan)  
Chairman

*(Handwritten signature)*

*(Faint typed text)*  
2800  
30/-  
31/-  
34/-

06/9/22

06/9/22  
06/9/22



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Answer B

16

Dated: Peshawar the 04<sup>th</sup> October, 2022

**NOTIFICATION**

**NO.SOH (E-V)/4-4/2022**

The following posting/ transfer of doctors are hereby ordered with immediate effect, in the best public interest:-:-

| S.NO. | NAME OF DOCTOR                                      | FROM   | TO  |
|-------|---|--|---|
| 1.    | Dr. S.M Taimur Shah,<br>Management Cadre<br>(BS-19) | District Health Officer<br>(BS-20) Torghar   | Report to Directorate<br>General Health Services,<br>Khyber Pakhtunkhwa |
| 2.    | Dr. Jamil Ahmad,<br>Management Cadre<br>(BS-19)     | Under transfer to<br>Directorate General<br>Health Services, Khyber<br>Pakhtunkhwa | District Health Officer<br>(BS-20), Torghar in OPS.<br>Vice S.No.01.    |

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

No. 3485-93 / Notification dated: 04-10-22 & dated:

Copies forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director General Health Services. Khyber Pakhtunkhwa.
3. District Health Officer, Torghar.
4. District Accounts Officer, Torghar.
5. PS to Secretary Health Department Khyber Pakhtunkhwa.
6. Deputy Director (IT), Health Department, Peshawar.
7. Both the doctors concerned.
8. Personal files of the doctors concerned.

  
(NADIR NAZAR)  
SECTION OFFICER (E-V)



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

(17)

Dated: Peshawar the 06<sup>n</sup> October, 2022

**NOTIFICATION**

**NO.SOH (E-V)/4-4/2022**

The following posting/ transfer of doctors are hereby ordered with immediate effect, in the best public interest:-:-

| S.NO. | NAME OF DOCTOR                                      | FROM  | TO  |
|-------|---|---|---|
| 1.    | Dr. S.M Taimur Shah,<br>Management Cadre<br>(BS-19) | District Health Officer<br>(BS-20), Torghar       | Report to Directorate<br>General Health Services,<br>Khyber Pakhtunkhwa |
| 2.    | Dr. Jamil Ahmad,<br>Management Cadre<br>(BS-19)     | Medical Superintendent,<br>DHQ Hospital, Batkhela | District Health Officer<br>(BS-20), Torghar in OPS.<br>Vice S.No.01.    |

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

No. 3521-29 / Notification of even No. & dated:  
Copies forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director General Health Services. Khyber Pakhtunkhwa.
3. District Health Officer, Torghar.
4. Medical Superintendent, DHQ Hospital, Batkhela.
5. District Accounts Officer, Torghar & Batkhela.
6. PS to Secretary Health Department Khyber Pakhtunkhwa.
7. Deputy Director (IT), Health Department, Peshawar.
8. Both the doctors concerned.
9. Personal files of the doctors concerned.

  
(NADIR NAZAR)  
SECTION OFFICER (E-V)

18

To,

**THE CHAIRMAN**  
**Provincial Inspection Team**  
Khyber Pakhtunkhwa, Peshawar.

Subject: -

**STATEMENT REGARDING PDA & YDA PRESS CONFERENCE ON**  
**13/09/2022.**

Sir,

Reference to your good office telephonic message on 3/10/2022.

I have the honor to state before submitting my statement on the subject noted issue; I am denying holding the press conference, which was arranged by the YDA/PDA Malakand Division, actually, and the said meeting was their decision.

I was not aware, and did not pay any fee, submitted any written, or verbally request to press club for arranging the subject noted above.


With respect, it is stated that I had no such intension for any Press Conference / media talks because on the same day i.e. 13<sup>th</sup> September 2022, I was engaged in **Tender Opening** meeting in my office under my Chairmanship at DHQ Hospital Batkhela. During the cited meeting, I received call from President of PDA Malakand Division at Swat (Provincial Doctors Association); he asked me for a meeting in District Swat, regarding the incident occurred on 2<sup>nd</sup> September 2022. I refused due the Tender Opening meeting, but they insisted that the issue has been highlighted on social media and have involved life threats and character assassination, and also related to the dignity / security of doctor's community, therefore you must attend the meeting.

Sir, as already in this scenario, I have received multiple threats before, and as some people already have attacked me on 2<sup>nd</sup> September 2022 in the DHQ Hospital Batkhela. In this regards I have informed the District Administration, The Secretary Health, Minister Health and DGHS KP, as well as Judiciary of District Malakand and other concerned departments, vide this office letter No. 9500-11/FIR, dated.05/09/2022, letter No. 10073-82/FIR, dated. 15/09/2022, letter No. 9811-23/FIR, dated.12/09/2022 and letter No. 9428-34/DHQ/IR, (Copy attached as Annexure-I from Page 1 to 4) but there was no response, while I continued to receive threats with more aggressive attitude. It is further stated that before and after the incident the vested personals were in an active and aggressive campaign of character assassination and

threats against me and other hospital staff, particularly using Facebook account named (PTI Malakand), the said account has already been reported to FIA cybercrime via this office letter No. 9474-80/DHQ, dated. 03/09/2022 (Copy attached as annexure-II) but no response. This campaign intensified after 2<sup>nd</sup> September incident and I was sure that something serious is going to be happened in near future with my family or me. Keeping in view the above, I was worried about the silence of departments, and was feeling that something will be kept hidden when I lose my life. In this connection, I feel to convey my message to someone official and that my relatives may know the real situation. That is why on the same day after attending the tender opening meeting, I went to swat to meet the doctors community (on their invitations) and my family elders. I was not aware about press conference / talks with media. The doctor's community and my family elders were in stress and they verified and confirmed from me about the threats and other issues regarding incident occurred on 2<sup>nd</sup> September 2022. Before this, I had approached each responsible forum / department in this regard and found no response of those letters no verbal or written reply. Therefore, I became more anxious and some of my family members were in uncertain situation literally feel insecure and mentally tortured. I also kept personal guards with me due to the threats and uncertain situation. Therefore, I had to disclose the matter on the spot in front of my family and doctors community regarding the threats of my life and future claim, although I was on the opinion that to further wait for the response of the concerned authorities. The doctors community and my family compelled me that this is not a political issue neither anti-government activity but purely a matter of my life, so you have to disclose all the reality to the authorities and other concerned in case of any harmful / unfortunate activity against me and my family. On the spot, my brothers and other relatives were shocked to know about the critical situation I was going through, and they appealed the concerned authorities to secure the life of their brother / relative.

Therefore, it is, submitted in your kind honor that the meeting was arranged by the PDA / YDA Malakand Division for the protection of my life. I have only stated a message regarding the life threats, which were given to me, as evidence for future.

The statement report submitted for your kind information please.

  
**DR. JAMIL AHMAD**  
Medical Superintendent  
DHQ Hospital Batkhela

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Phone No. (0932) 410242, Fax No. (0932) 410243  
Email: dir@hospitals.gov.pk, info@hospitals.gov.pk

OFFICE OF THE  
MEDICAL SUPERINTENDENT DHQ HOSPITAL  
BATAIKHELA



Subject: REQUEST TO LODGE FIR

The Deputy Commissioner  
Malakand

To,

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

Dated: 05/10/2022

It is stated that, on 02.09.2022 at 09:30 PM Mr. Shakeel Ahmad Khan Minister for Public Health K.P. Mr. Nasar Khan Tehsil Mayor Batakheela, Mr. Hazrat Yousof S/O Fazli Aleem Political worker, Mr. Feroz S/O Firdos Political worker, Mr. Idrees Political worker, Mr. Iqram Muhammad S/O Musafar Khan, Mr. Dildar Mohalla Nawabhar, Political worker, Mr. Hussain Ahmad, Mr. Amir Bacha S/O Fazal Rahim Political worker and Mr. Zahid Ex Nazim Batakheela along with others liked workers have stormed into Hospital. They have blocked the Government residency of the undersigned at DHQ Hospital Batakheela and wrongfully confined the undersigned and his family, then took the undersigned along with his son to DMS Office and hostage the undersigned and his son in the DMS room. They have used abusive language/harsh and un-ethical words, have passed sardonic remarks and have rhetoric against the undersigned. Also have showed impertuous attitude. Beside this they have threatened the undersigned and pressurized to withdraw the suit/appeal he filed in Service Tribunal against his illegal transfer.

Therefore, it is requested in your kind honor to lodge FIR against the above mentioned persons for an necessary interference in Government/Official affairs, creating hindrance in the official duties/legal procedure of the undersigned. Wrongfully confinement/hostage of the undersigned and his son, use of abusive and un-ethical words, threats by stating to left Batakheela within 02 hours and withdrawal of suit filed by the undersigned against illegal transfer and pressurizing the undersigned.

Medical Superintendent  
DHQ: Hospital Batakheela

No 4500-11/1518

Copy forwarded for information and necessary action to the:-

- Commissioner Malakand Division at Saidu Sharif Swat
- Commandant Pak Army Fort at Malakand
- Additional Deputy Commissioner Malakand
- Assistant Commissioner Malakand at Batakheela
- Additional Inspector General of Police Special Branch Peshawar
- Incharge Special Branch Malakand Division at Swat
- Director General Intelligence Bannu Peshawar
- Incharge Military Intelligence Malakand
- PS to Secretary Health Govt of Khyber Pakhtunkhwa Peshawar
- PA to Director General Health Services Khyber Pakhtunkhwa Peshawar
- PA to Regional Director General Health Services Khyber Pakhtunkhwa Malakand at Swat

Medical Superintendent  
DHQ: Hospital Batakheela



OFFICE OF THE  
MEDICAL SUPERINTENDENT DHQ HOSPITAL  
BATKHELA

Phone No. (0932) 410242, Fax No. (0932) 410243  
Email: dhqh\_btk\_mkd@hotmail.com

Annexure 1  
Page No. 2

No. 10062-72-1 FIR

Dated: 15/9/2022

To,

The Honorable District Session Judge  
Malakand at Batkhela

Subject:

REQUEST TO LODGE FIR AGAINST DR. IRFAN UD DIN S/O OAZI HABIBUL  
MUKHTIAR RESIDENT OF AMANDARA

Sir,

It is stated that, Dr. Irfan Ud Din S/O Qazi Habibul Mukhtiar have illegally broke the lock of my Government residence at DHQ Hospital Batkhela, when I was in Peshawar and my family was in home town. In the said residence there were memory cards, USBS', some property registration files, Gold jewelry of my family (not estimated yet) and government woods, which were found missing after handed over the keys of the said residence by occupant to the undersigned. In the memory cards and in USBs there were my family personal pictures and videos of family functions, my research work of MPH and other important financial record. Beside this the subject doctor committed trespass and breeches the privacy of my family and home, which is against our religion, culture and law.

Also the undersigned submitted initial report (Roz Namcha) on 14-07-2022 at levy's post Batkhela and requested to Deputy Commissioner Malakand vide this office letter No. 8791-96/FIR dated: 22-08-2022 (copy attached as annexure-1) but till now no action has been taken in this regard.

Therefore, it is requested in your kind honor to take necessary action in this regard to avoid hindrance in justice process.

No 10062-72-1 FIR

Copy forwarded for information and necessary action to the: -

- Commissioner Malakand Division at Saidu Sharif Swat
- PS to Secretary Health Govt; of Khyber Pakhtunkhwa Peshawar
- PA to Director General Health Services Khyber Pakhtunkhwa Peshawar
- PA to Regional Director General Health Services Khyber Pakhtunkhwa Malakand at Swat

Medical Superintendent  
DHQ: Hospital Batkhela  
etc

Medical Superintendent  
DHQ: Hospital Batkhela  
etc

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# Annexure I Page No. 3

Reminder-1

OFFICE OF THE MEDICAL SUPERINTENDENT  
DHQ HOSPITAL BATKHELA DISTRICT MALAKAND  
Phone No. (0932) 410242, Fax No. (0932) 410243 Email: dhqh\_btk\_mkd@hotmail.com

No. 9811-23 FIR  
To,

Dated. 12 /09/2022

The Deputy Commissioner  
Malakand

Subject: REQUEST TO LODGE FIR  
Sir,

In continuation of this office letter No. 9500-11/FIR dated: 05-09-2022 (copy attached as Annexure-I).

I have the honor to state that this office has requested to your kind office to lodge FIR but till now no response in this regard has been observed or by this office and no copy of the subject FIR received to this office.

Therefore, it is requested in your kind honor to lodge FIR against the mentioned persons in the reference letter (copy attached) for an necessary interference in Government/official affairs, creating hindrance in the official duties/legal procedure of the undersigned. Wrongfully confinement/Hostage of the undersigned and his son, use of abusive and un-ethical words, threats by stating to left Batkhela within 02 hours and withdrawal of suit/appeal filed by the undersigned against illegal transfer and pressurizing the undersigned.

This office will be thankful for your prompt response in this regard.

Medical Superintendent  
DHQ: Hospital Batkhela  
9/10

No. 9811-23 FIR

Copy forwarded for information and necessary action to the: -

- District Session Judge Malakand at Batkhela
- Commissioner Malakand Division at Saidu Sharif Swat
- Commandant Pak Army Fort at Malakand
- Additional Deputy Commissioner Malakand
- Assistant Commissioner Malakand at Batkhela
- Additional Inspector General of Police Special Branch Peshawar
- Incharge Special Branch Malakand Division at Swat
- Director General Intelligence Bearu Peshawar
- Incharge Military Intelligence Malakand
- PS to Secretary Health Govt; of Khyber Pakhtunkhwa Peshawar
- PA to Director General Health Services Khyber Pakhtunkhwa Peshawar
- PA to Regional Director General Health Services Malakand at Swat

Medical Superintendent  
DHQ: Hospital Batkhela  
9/10



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# OFFICE OF THE MEDICAL SUPERINTENDENT

## DISTRICT HEADQUARTER HOSPITAL BATKHELA

Phone # 0932410242 Fax No. (0932) 410243 Email: dlhqh\_btk\_mkd@hotmail.com

www.facebook.com/dlqhbtbk

No. 2423 /DHQ/IR

Dated. 3<sup>rd</sup> September 2022

To,

The Director General Health Services  
Khyber Pakhtunkhwa, Peshawar

# Annexure I Page No. 4

Subject: -  
R/Su.

### INCIDENT REPORT

With due respect it is stated that last night on 2/9/2022 at 9:30 PM. Mr. Shakeel Ahmad Khan Minister for Public Health KP, Mr. Nasir Khan Tehsil Mayor Batkhela along with their armed workers stormed in the Hospital. They have blockade the Government Resident of the undersigned and wrongful confined the undersigned and his family, then they took the medical superintendent to DMS room and hostage him along with his son in the said room. They have used abusive language/ harsh and unethical words, passed sardonic remarks and rhetoric against the medical superintendent DHQ Hospital Batkhela. have showed imperious attitude. Beside this they threaten the undersigned to withdraw the suit he has filed for his illegal transfer in Service Tribunal and also threatened the undersigned to leave this station and made your transfer to somewhere else, otherwise you will be not able to work here as Medical Superintendent.

The report Submitted for your kind information and further necessary action please.

  
MEDICAL SUPERINTENDENT  
DHQ Hospital Batkhela

#### Endst: No and Dated Even:

Copy forwarded for Information to:

- The PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar.
- The Commissioner Malakand Division at Saidu Sharif Swat.
- The Secretary Health Govt of Khyber Pakhtunkhwa, Peshawar.
- The Deputy Commissioner, Malakand
- The PS to Minister for Health Govt of Khyber Pakhtunkhwa, Peshawar.
- The Regional Director Health Services Malakand Division.

  
MEDICAL SUPERINTENDENT  
DHQ Hospital Batkhela

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**Annexure II**  
**Page No. 1**  
**OFFICE OF THE MEDICAL SUPERINTENDENT**  
**DISTRICT HEADQUARTER HOSPITAL BATKHELA**  
 Phone. # 0932410242 Fax No. (0932) 410243 Email: dhqh\_btk\_mkd@hotmail.com  
 www.facebook.com/dhahbtk

No. 9114-20/DHQ/

Dated. 3<sup>rd</sup> September 2022

To, **The Director Federal Investigation Agency**  
 Cyber Crime wing Peshawar.

Subject: - **REQUEST TO TAKE LEGAL ACTION AGAINST THE SOCIAL MEDIA MISUSER**

R/Sir,

It is stated that Admin of Facebook account named PTI Malakand (Link of ID. <https://www.facebook.com/abuahdullah.7274>) consistently active in spreading negative propaganda and baseless allegations / Information against Administration and Hospital staff of DHQ Hospital Batkhela for the purpose to defame Hospital administration / Hospital staff and health department in public eyes to create law and order situation. Such baseless contents shared on the cited account is causing to provoke public / patients and creating issue to administration of this Hospital. Copies of his / her shared posts / photos and Links on Facebook account is attached is as Annexure-I.

You are therefore: requested to please enquire about above mentioned account / posts and take legal action against the admin of the account under the cybercrime law 2016 please.

Your prompt response in this regard will be highly appreciated.

**MEDICAL SUPERINTENDENT**  
 DHQ Hospital Batkhela

**Endst: No and Dated Even:**

- Copy forwarded for Information to:
- The Deputy Commissioner Malakand
  - The Commanding Officer Pak Army Malakand Fort
  - The PS Secretary Health Govt: of Khyber Pakhtunkhwa, Peshawar.
  - The PS to Minister for Health Govt: of Khyber Pakhtunkhwa, Peshawar.
  - The PA to DGHS Khyber, Pakhtunkhwa, Peshawar.
  - The PA Regional Director Health Services Malakand Division.

**MEDICAL SUPERINTENDENT**  
 DHQ Hospital Batkhela