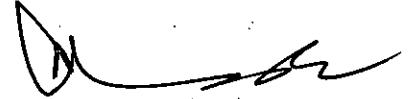


7<sup>th</sup> July, 2022

Learned counsel for the appellant present.

2. Learned counsel for the appellant submits that grievance of the appellant has been redressed and he wants to withdraw the instant appeal. As a token of admission of his submission he signed the margin of the order sheet. Dismissed as withdrawn. Consign.

3. *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal on this 7<sup>th</sup> day of July, 2022.*

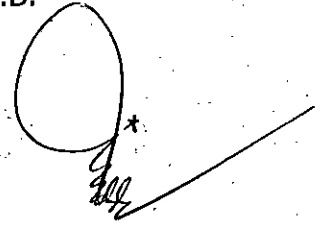


(Kalim Arshad Khan)  
Chairman

I hereby do withdraw  
My instant Petition.  
Counsel Shaukat Advi

09.12.2021

Nemo for the appellant. Notice for prosecution of the appeal be issued to the appellant as well as her counsel and to come up for preliminary hearing on 04.02.2022 before S.B.



(MIAN MUHAMMAD)  
MEMBER (E)

04.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 13.04.2022 for the same as before.

*Noted*



Reader

13.04.2022

No one present on behalf of the appellant. Notice be issued to the appellant and her counsel for the date fixed. To come up for preliminary hearing on 07.07.2022 before S.B.




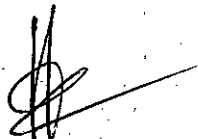
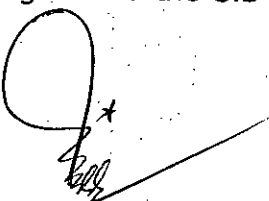
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 7554 /2021

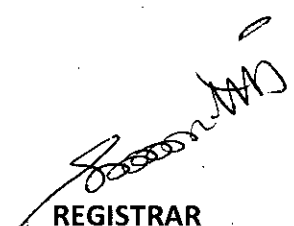
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/10/2021	<p>The appeal of Mst. Sadia Gul resubmitted today by Mr. Shoukat Khan Safi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>12/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	D 12.10.2021	<p>None for the appellant present.</p> <p>Notices be issued to the appellant and her counsel. Adjourned. To come up for preliminary hearing before the S.B on 09.12.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

The appeal of Mst. Sadia Gul w/o Dr. Ayaz Ashraf FWW I/C FW Centre Population Welfare Department received today i.e. on 27.09.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- ⑤ Appeal is premature which may be filed after maturity of cause of action.
- 6- Address of respondent no. 5 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.


No. 1935 /S.T,

Dt. 29/09 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Shaukat khan Safi adv. Pesh.

All the objection had been removed and re-submitted -

  
30/9/2021

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

Mst: Sadia Gul

**Versus**

Secretary Population

Welfare Department & others

..... Appellant

..... Respondents

<b>S NO</b>	<b>CONTENTS</b>	<b>YES</b>	<b>NO</b>
1.	This appeal has been presented by: <u>Shoukat Khan Safi Advocate High Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- Shoukat Khan Safi

Signature:- 

Dated:- 27-9-2021



1

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

Service Appeal No:- 7584 /2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7643

Dated 27/9/2021

Mst: Sadia Gul W/o Dr. Ayaz Ashraf (FWW) I/C FW-Centre Population Welfare Department, Khyber Pakhtunkhwa, Peshawar R/o Mohallah Islamabad Nishtar Abad Road, Tehsil & District Peshawar  
.....Appellant

**Versus**

1. The Secretary Population Welfare Department, Khyber Pakhtunkhwa, Warsak Road, Peshawar
2. The Director General Population Welfare Department Khyber - Pakhtunkhwa at F.C. Plaza, Peshawar Cantt.
3. The Deputy Director Population Welfare Department Khyber Pakhtunkhwa, Peshawar.
4. District Population Welfare Officer, Peshawar.

Incharge FWCs concerned Mrs Shagufta Khamam Fwc Patwar

.....Respondents

Filed to-day  
5  
2021  
Registrar

SERVICE APPEAL UNDER 4 OF THE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED  
ORDER (TRANSFER ORDER) DATED 14/09/2021 OF  
RESPONDENT NO 4 BY WHICH THE APPELLANT HAS BEEN  
TRANSFERRED FROM FWC PALOSI TO FWC PHARI PURA AND  
THEREAFTER FROM FWC PHARI PUR FWC PATWAR VIDE  
ORDER DATED 20/09/2021.

Re-submitted to-day  
and filed.

Registrar 6/10/21

***Prayer in Appeal:-***

By accepting the instant Service Appeal, the impugned order of respondent No 4 dated 14/09/2021 by which the appellant has been transferred from FWC Palosi to FWC Phari Pura and thereafter from FWC Phari Pur FWC Patwar vide order dated 20/09/2021 may kindly be allowed to continue her duties as (FWW) I/C FW Center Phari Pura.

***Respectfully Sheweth:-***

*The facts pertaining to this appeal are as under:-*

1. *That the appellant is bonafide resident of District Peshawar Khyber Pakhtunkhwa and join the Population Welfare Department as (FWW) I/C FW-Center.*
2. *That ever since her appointment the appellant have preformed her duties with zeal and devotion and without any complaint whatsoever with regard to her duties and her performance was always appreciated by the High-Ups.*
3. *That the appellant while performing her duties in the said capacity, the appellant was transferred vide impugned order of respondent No 4 dated 14/09/2021 from FWC Palosi to FWC Phari Pura and thereafter from FWC Phari Pur to FWC Patwar vide order dated 20/09/2021. (Copies of impugned orders dated 14/09/2021 & 20/09/2021 are attached as annexure "A" & "B").*



(3)

4. That against the impugned order of respondent No 4 dated 14/09/2021 from FWC Palosi to FWC Phari Pura and thereafter from FWC Phari Pur to FWC Patwar vide order dated 20/09/2021, the appellant preferred a departmental appeal before the respondent No 2, but till date the respondent No 2 did not pay any heed to the request of appellant. (Copy of appeal is attached as annexure "C").
5. That now the appellant aggrieved from the impugned order of respondent No 4 dated 14/09/2021 from FWC Palosi to FWC Phari Pura and thereafter from FWC Phari Pur to FWC Patwar vide order dated 20/09/2021, approached before this Honourable Service Tribunal inter alia on the following grounds:-

**Grounds:-**

- A. That the impugned order of respondent No 4 dated 14/09/2021 from FWC Palosi to FWC Phari Pura and thereafter from FWC Phari Pur to FWC Patwar vide order dated 20/09/2021 are illegal and void ab-initio being passed in utter violation of law, rules and policy on the subject because the Worthy Minister of Population Welfare Department Government of Khyber Pakhtunkhwa banned the posting transfer in the said department.

(4)

- B. *That the appellant has not been treated in accordance with law & rules on the subject.*
- C. *That the impugned order is against the pronouncements of the superior judiciary of the country:*
- D. *That due to malafide and connivances of the Mr. Shoukat Ali, Parliamentary Secretary Ministry of Interior, Government of Pakistan, transfer order of the appellant has been issued.*
- E. *That it is pertinent to mentioned here that the appellant is the patient of bone disease and doctors advice her to avoid traveling. (Copies of medical prescriptions are attached as annexure "D").*
- F. *That it is settled law that no one be condemned unheard and in the instant case valuable rights of the appellant has been infringed.*
- G. *That infact there exists no exigencies of service nor the order of transfer can be terms as in the public interest and does not tenable in the eye of law.*

(5)

- H. *That the impugned order is illegal, unlawful, without lawful authority, politically motivated and with malafide intention, just to adjust blue eyed persons to put the appellant in stress, mental and physical torture. The impugned order is in violation of transfer posting policy and is thus passed, which is nullity in the eyes of law.*
- I. *That even otherwise it is not in the interest of department to make its employees ruling stone on one hand and the working atmosphere of the department is disturbed on the other hand and the employee also faces evaluation.*
- J. *That in the whole of appellant's service carrier there is not a single complaint regarding my performance, which could be made bases of my frequent, pre-mature transfer order.*
- K. *That any other ground will be raised at the time of arguments with kind permission of this Honourable Tribunal.*

*It is, therefore, most humbly prayed that on acceptance of this Service Appeal, the impugned order of respondent No 4 dated 14/09/2021 by which the appellant has been transferred from FWC Palosi to FWC Phari Pura and*

(6)

*thereafter from FWC Phari Pur FWC Patwar vide order dated 20/09/2021 may kindly be allowed to continue her duties as (FWW) I/C FW Center Phari Pura.*

Dated:- 27/09/2021

Through:-

Appellant

Shoukat Khan Safi  
Advocate High Court

**Certificate:-**

*It is certify that no such like Service Appeal has earlier been filed by the Appellant in this Honourable Tribunal.*

Advocate.

7

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

Service Appeal No:- \_\_\_\_\_/2021

Mst: Sadia Gul

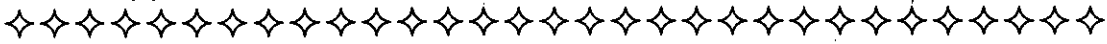
**Versus**

Secretary Population

Welfare Department & others

..... Appellant

..... Respondents



**AFFIDAVIT**

I, Mst: Sadia Gul W/o Dr. Ayaz Ashraf (FWW) I/C FW-  
Centre Population Welfare Department, Khyber Pakhtunkhwa,  
Peshawar R/o Mohallah Islamabad Nishtar Abad Road, Tehsil  
& Distinct Peshawar (The appellant) do hereby solemnly affirm  
and declare on oath that the contents of this accompanying  
Service Appeal are true and correct to the best of my knowledge  
and belief and nothing has been concealed from this Honourable  
Court.

*Sadia Gul*

DEPONENT  
CNIC No:-  
Cell No:-

30/07/2021



- (9)
4. That for issuing interim relief, the contents of main appeal may kindly be considered as integral part of this application.

*It is, therefore, humbly prayed that on acceptance of this application, the impugned order of respondent No 4 dated 14/09/2021 by which the appellant has been transferred from FWC Palosi to FWC Phari Pura and thereafter from FWC Phari Pur FWC Patwar vide order dated 20/09/2021 may kindly be suspended, till the final decision of the titled appeal.*

Dated:- 27/09/2021

Through:-

  
Petitioner

  
Shoukat Khan Safi  
Advocate High Court





(11)

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

Service Appeal No:- \_\_\_\_\_/2021

Mst: Sadia Gul

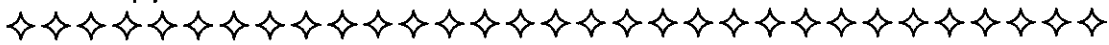
**Versus**

Secretary Population

Welfare Department & others

..... Appellant

..... Respondents



**ADDRESSES OF PARTIES**

**APPELLANT**

Mst: Sadia Gul W/o Dr. Ayaz Ashraf (FWW) I/C FW-Centre Population Welfare Department, Khyber Pakhtunkhwa, Peshawar R/o Mohallah Islamabad Nishtar Abad Road, Tehsil & District Peshawar

**RESPONDENTS**

1. The Secretary Population Welfare Department, Khyber Pakhtunkhwa, Warsak Road, Peshawar
2. The Director General Population Welfare Department Khyber - Pakhtunkhwa at F.C. Plaza, Peshawar Cantt.
3. The Deputy Director Population Welfare Department Khyber Pakhtunkhwa, Peshawar.
4. District Population Welfare Officer, Peshawar.
5. Incharge FWCs concerned *Mrs Shaqubta Khanam FWC Patawar -*

Dated:- 27/09/2021

*Sadia*  
Appellant

Through:-

*AM*  
Shoukat Khan Safi  
Advocate High Court



12

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**OFFICE OF THE DISTT: POPULATION WELFARE OFFICER**  
Phase: VII Sector: E-8 Near Allied Bank Haji Camp Hayatabad Peshawar  
PO No. 091/9219051



No. 10151/2020-21-Admin

Dated: 20/09/2021

**OFFICE ORDER**

In partial modification of this office order of even number dated 14/09/2021, Mrs. Sadia Gul FWW at S.No.2 is hereby posted at PWC Patwar instead of FWC Pahari Pura while Mrs. Shagufta Khanum, FWCir, FWC Patwar is hereby transferred and posted against the vacant post at FWC Pahari Pura with immediate effect till further orders.

Sd/

District Population Welfare Officer,  
Peshawar

Copy to:

1. PS to Special Assistant to Chief Minister on Population Welfare Khyber Pakhtunkhwa with reference to D.O letter dated 17.09.2021 of Mr. Shaukat Ali Parliamentary Secretary Ministry of Interior Government of Pakistan Islamabad and directions of PS to Special Assistant to Chief Minister on Population Welfare Khyber Pakhtunkhwa on face of the application of Mrs. Shagufta Khanum dated 17/09/2021.
2. Incharge FWCs concerned.
3. Officials Concerned for compliance.
4. Personal Files of the officials concerned.

Dy: District Population Welfare Officer  
Peshawar



9/30/21

**GOVERNMENT OF KHYBER PAKHTUNKHWA**

**OFFICE OF THE DISTT: POPULATION WELFARE OFFICER**

**Phase-VII Sector-18 Near Allied Bank Haji Camp Hayatabad Peshawar**

**Dated 20/09/2021**

**OFFICE ORDER**

In partial notification of this office order of even number dated 14/0/2021 Mrs. Sadia Gul FWW at S. No is hereby posted at PWC Patwar instead of FWC Pahari Pura while Mrs. Shagufta Khanum FWC Patwar is hereby transferred in posted against in vacant post at FWC Pahari Pura with immediate effect till further order.

Sd/

District Population Officer

Peshawar

Copy to:

1. PS to Special Assistant to Chief Minister of Population Welfate Khyber Pakhtunkhwa with reference to D.O letter dated 17/09/2021 of Mr. Shaukat Ali Parliamentary Secretary Ministry of Interior Government of Pakistan Islamabad and direction of PS to Special Assistant to Chief Minister on Population Welfare Khyber Pakhtunkhwa on face of the application of Mrs. Shagufta Khanum dated 17/09/2021.
2. Incharge FWCs concerned.
3. Official concerned for compliance.
4. Personal file of the official concerned.

Dy: District Population Welfare Officer

Peshawar.



13

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**OFFICE OF THE DISTT: POPULATION WELFARE OFFICER**  
Phase- VII Sector E/8 Near Allied Bank Haji Camp Hayatabad Peshawar  
---Ph. No. 091-9219051---

F.No. 1(16)/2020-21-Admn

Dated: 14/09/2021

**OFFICE ORDER**

The following posting/transfer is hereby ordered in relaxation of ban with immediate effect and till further orders in Public interest:

S. No	Name of Officials	From FWC	To FWC	Remarks
1.	Mrs. Yasmeen Begum (FTO) I/C FW-Centre	Badhaber (M)	Palosi	Vice S.No-2
2. ✓	Mrs. Sadia Gul (FWW) I/C FW-Centre	Palosi	Pahari Pura	Against the vacant post
3.	Mrs. Misbah Shoukat FWA (F)	Mashogagar	Badhaber (M)	Against the post of FWW to lookafter the work of I/C FW-Centre till further orders.

Sd/

District Population Welfare Officer,  
Peshawar

Copy to:

1. PS to Special Assistant to Chief Minister on Population Welfare Khyber Pakhtunkhwa with reference to directions on face of the D.O letters dated 27.07.2021 of Mr. Shaukat Ali Parliamentary Secretary Ministry of Interior Government of Pakistan Islamabad and Mr. Pir Fida (Adv) MPA, KP-74 dated 31.08.2021.
2. Incharge FWCs concerned.
3. Officer/Official Concerned for compliance.
4. Personal Files of the officer/official concerned.

Dy: District Population Welfare Officer,  
Peshawar



To

The Most Respected  
Director General  
Population Welfare Department  
Khyber Pakhthunkhwa, Peshawar

Subject: - DEPARTMENTAL APPEAL AGAINST THE TRANSFER  
ORDER DATED: 20/09/2021 PASSED BY DISTRICT  
POPULATION OFFICER, PESHAWAR.

Respected Sir,

1. That the appellant is bonafide resident of District Peshawar Khyber Pakhthunkhawa and join the population Welfare Department as (FWW) I/C FW-Center..
2. That ever since her appointment the appellant have performed her duties with zeal and devotion and without any complaint whatsoever with regard to her duties and her performance was always appreciated by the High-Ups.
3. That the appellant while performing her duties in the said capacity the appellant was transferred from FWC Paharipura to FWC Patwar, Peshawar vice order dated 20/09/2021.

30/09/21



4. That the impugned transfer order No.F. No 1 (16)/2020-21-Admin is illegal, against the facts, unconstitutional and liable to be set aside inter alia on the following grounds: -

Grounds: -

- A. That the impugned order is illegal and void ab-initio being passed in utter violation of law, rules and policy on the subject because the worthy Minister of Population Welfare Department Government of Khyber Pakhtunkhwa banned the posting transfer in the said department.
- B. That the appellant has not been treated in accordance with law & rules on the subject.
- C. That the impugned order is against the pronouncements of the superior judiciary of the country.
- D. That due to malafide and connivances of the Mr. Shoukat Ali, Parliamentary Secretary Ministry of Interior, Government of Pakistan, transfer order of the appellant has been issued.

- E. That it is pertinent to mentioned here that the appellant is the patient of bone disease, vertebral discs compression + vertebral column stenosis and doctors advice her to avoid long travelling. (copies of medical prescriptions are attached).
- F. That it is settled law that no one be condemned unhead and in the instant case valuable rights of the appellant has been infringed.
- G. That infact there exists no exigencies of service nor the order of transfer can be terms as in the public interest and does not tenable in the eye of law.
- H. That the impugned order is illegal, unlawful, without lawful authority, politically motivated and with malafide intention, just to adjust blue eyed persons to put the appellant in stress, mental and physical torture. The impugned order is in violation of transfer posting policy and is thus passed, which is mullity in the eyes of law.
- I. That even otherwise it is not in the interest of department to make its employees ruling stone on one hand and the

17

working atmosphere of the department is disturbed on the other hand and the employee also faces evaluation.

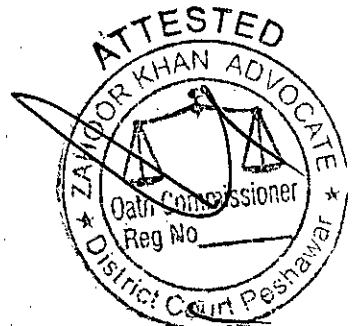
- J. That in the whole of appellant's service carrier there is not a single complaint regarding my performance, which could be made bases of my frequent, pre-mature transfer order.
- K. That any other ground will be raised at the time of personal hearing.
- L. That the applicant is residing in Mohalla Islamabad, Nishtar Abad Road Peshawar City.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal, the transfer order dated 20/09/2021 may kindly be set aside and the appellant may kindly be allowed to continue her duties as (FWW) I/C FW- Center Pharri pura.

Dated: 21/09/2021

*Sadia Gul*

Mrs. Sadia Gul  
(FWW) Pharri Pura I/C FW-Center  
Cell No.: 0345-9201318



*Sadia Gul*



18

# NEW SHIFA OPEN MRI

Name: SADIA GUL	Age: 30 Y	Gender: F
	Date: 28.06.2021	

## MRI LUMBOSACRAL SPINE

### CLINICAL DATA:

Backache and leg pain

### EXAMINATION TECHNIQUE:

Multiplanar imaging done through lumbosacral spine acquiring T1/T2W sagittal and axial sequences.

### REPORT:

**L1/L2:** Mild circumferential disc bulge is noted with no thecal sac compression or neural tissue compromise.

**L2/L3:** Mild circumferential disc bulge is noted with no thecal sac compression or neural tissue compromise.

**L3/L4:** Circumferential disc bulge is noted causing compression of thecal sac and bilateral lateral recesses. Mild bilateral exit foraminal stenosis is seen. Nerve roots are deviated however not compressed.

**L4/L5:** Circumferential disc bulge is noted causing compression of thecal sac, bilateral lateral recesses, exit foramina and nerve roots.

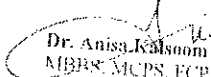
**L5/S1:** Circumferential disc bulge is noted causing compression of thecal sac, bilateral lateral recesses, exit foramina and nerve roots.

Partial disc desiccatory changes are seen at multiple levels.

Conus medullaris ends at normal level. Visualized spinal cord appears normal with no evidence of any area of abnormal signal intensity in it. Vertebral bodies are intact and the vertebral marrow show normal signal. No prevertebral or paravertebral mass is seen.

### IMPRESSION:

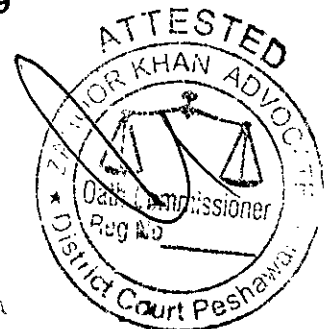
Multilevel disc bulges with changes relatively marked at L5 junction with bilateral neural tissue compromise

  
 Dr. Anisa Kalsoom  
 MBBS, MCPS, FCPS  
 Classified Radiologist  
 Fauji Foundation Hospital  
 Rawalpindi  
 Asst. Professor  
 FUMC Islamabad

📍 Ali Medical Center, Near Emergency Gate LRH Peshawar.

☎ 0301-8814100 - 0313-8071571 - 03155512619

30/02/21





**ACCIDENT & EMERGENCY DEPARTMENT**  
**Khyber Teaching Hospital**  
**Medical Teaching Institution,**  
**Peshawar - KPK**

19

Invoice #K03211791561

M.R. No : K03ACE21322183

Operator IMRAN GULDER

30 Year(s)

Female

Sadia Gul

12:06:49

21-JUN-21

TRAUMA UNIT

CASUALTY



**Complaints:**

LBP radiating to @ ankle → 4 months

Rx

UBA

**Findings:**

Refer to LPH Physiotherapy

Tab Motrin 4mg  
1-1

Tab Preliq 7mg  
5-1, ①

**Investigations:**

MR I Lumbosacral spine

Tab Voltex 8x long  
1-1, ①

**Diagnosis:**

Tab Meloxicam 1-1, ①  
Tab Tramadol 1-1, ①  
Tab Esker 1-1, ①

Next Visit:

Consultant Name: Dr. Sajid

Signature:



Phone: 091-9224401-07

Website: www.kth.gov.pk

30/6

20

Assistant Professor

**Dr. Mian Iftikhar-ul-Haq Azeemi**

FCPS (Neurosurgery), FCPS (General Surgery)  
MCPS (Pak), MRCS (UK), MBBS (Pak)

Department of Neurosurgery  
Lady Reading Hospital MTI, Peshawar.



Institutional Based Private Practice  
OPD Block, Lady Reading Hospital (L.R.H)  
Medical Teaching Institution Peshawar

اسٹنٹ پروفیسر  
ڈاکٹر میاں افتخار الحق عظیمی

ایف سی پی ایس (جنرل سرجری)، ایف سی پی ایس (نورل سرجری)  
ایم بی بی ایس (پاکستان)، ایم آر سی یو کے، ایم سی پی ایس (پاکستان)

Name: SADIA GUL

Date: 1-7-21

MR# 4287680

Back pain,

Hand pain,

Hand pain

Zenbar 30 mg

10 — 30

3 — 1 + 1

اصحابی  
وہ  
وہ

Ad of the head over for  
seven days

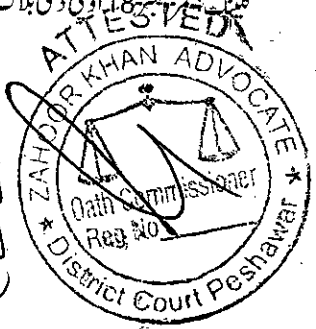
دو بارہ معائنہ کیلئے  
بعد تشریف لائیں۔

ASSISTANT PROFESSOR  
NEURO SURGEON  
MIAN IFTIKHAR UL HAQ AZEEM

رابطہ نمبر: 0310-9000179

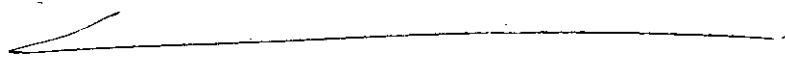
چھٹی ہفتہ، اتوار

کلکتہ نمبر 18، اولی ڈی بلاک ایڈی ریڈنگ ہسپتال ایم ٹی آئی پشاور



30705

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Handwritten scribbles and a circled number '20'.

Tab Felding  
Handwritten notes and symbols in a vertical column.

Symmetrical parts  
1 + 1 + 1

20 percent 4000  
3 3 1

21

Dr. Naveed Zaman Akhuzada  
Assistant Professor Neurosurgery  
MBBS (AMC), FCPS (Aga Khan Hospital Karachi)  
Consultant Neurosurgeon | PMDC No. 15527-N  
naveed.zaman@rmi.edu.pk | Direct Tel: +92-91-5838076

PATIENT Sadia Gul, 33y, FEMALE PRN 19-09-101466

DATE Sep 16, 2021

**DIAGNOSES**

- Lumbar spinal stenosis
- Lumbar facet joint pain

**CHIEF COMPLAINT**

Backache  
Radiating to lower limbs (Off / On)

**EXAMINATION FINDINGS**

Awake, Alert, Oriented  
Cranial Nerves -- (Intact)  
Power --- 5/5 (In all Four Limbs)  
Reflexes -- +2  
Sensory (Pin prick / Light Touch) -- intact

**Rx**

Nuberol - Tablet - 50/650 mg

1 گولی صبح + 1 گولی دوپہر + 1 گولی شام - 21 دن

Synflex - Tablet - 500 mg

1 گولی صبح + 1 گولی شام - 14 دن

Esso - Capsule - 40 mg

1 کیپسول صبح - 14 دن

Zeegap - Capsule - 50 mg

1 کیپسول صبح + 1 کیپسول شام - 30 دن

Revitale-B - Tablet

1 گولی شام - 30 دن

**INSTRUCTIONS**

Return to Clinic if condition deteriorates

Take Medication Regularly

Physiotherapy (Stretching exercises Followed by isometric spine exercises)

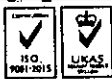
Avoid Heavy Lifting

Follow up

*Lumbar Spine*

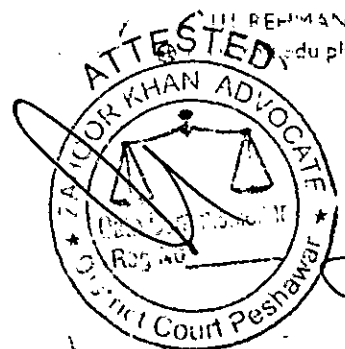


Printed by Dr. Naveed Zaman Akhuzada on Sep 16, 2021 at 03:05 PM



5/B-2 Phase - 5-Hayatabad Peshawar Pakistan

Tel: +92-91-5838000 | Fax: +92-91-5838333 | Appointments: +92-91-5838666  
healthcare@rmi.edu.pk



1/1

30/9/2021

(22)

Subject: Request for Re-employment in FWC in Putwar & Cancellation of Order from FWC Putwar Due to my Medical Issue (Vertebral & Lumber Spinal Stenosis)

Respected Sir,

Respectfully, it is requested that I am working as FWW in Population Welfare Dept since Last 5 Years and Performing My Duty With Full Honesty & Sincerity. Respected Sir I have some serious neurological issues eg. Vertebral Discs Stenosis & Lumber Spinal Stenosis which make me so painful & Severe Backache & Legs stiffness whenever I travel long so a few days ago officially i have been transferred to FWC Paharri pura on vacant post which is near to my residence I am living in Mohallah Islamabad Nishter Abad Road but today I came to know that I am transfer to FWC Putwar which t is located so far away from my residency which will make me so stressed & painful even I would b unable to walk while doctors strictly suggested me from long traveling. So Through This application I am Requesting to you that kindly issue order to continue my duty in FWC Paharri Pura & cancel order of my transfer to FWC Putwar because I have severe health issues and these may b move toward more chronic & severe stages & conditions due to agony of long traveling through public transport

Keeping In View My Health issues & poblems, it is therefore requested to kindly adjust me according to my request with best of your strength & honesty.

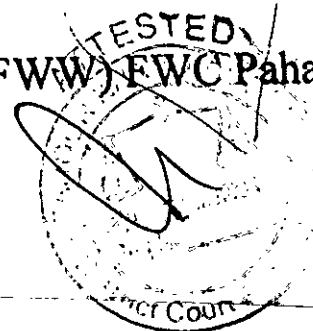
I shall be very thankful to you and obligue.

Note: All of my medical records & Testimonials' attached with this application

Your Faithfully ,

SADIA GUL (FWW) FWC Paharri Pura

30/02/2022



23

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

Service Appeal No:- \_\_\_\_\_/2021

Mst: Sadia Gul

**Versus**

Secretary Population

Welfare Department & others

..... Appellant

..... Respondents

**NOTICE UNDER RULE 11 OF KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL RULES 1974 FOR FILLING OF**  
**SERVICE APPEAL.**

To

1. The Secretary Population Welfare Department, Khyber Pakhtunkhwa, Warsak Road, Peshawar
2. The Director General Population Welfare Department Khyber - Pakhtunkhwa at F.C. Plaza, Peshawar Cantt.
3. The Deputy Director Population Welfare Department Khyber Pakhtunkhwa, Peshawar.
4. District Population Welfare Officer, Peshawar.
5. Incharge FWCs concerned

**Respected Sir**

*Please take notice that I am going to file a Service Appeal before the Honourable Khyber Pakhtunkhwa Services Tribunal, Peshawar against the the impugned order of respondent No 4 dated 14/09/2021 by which the appellant has been transferred from FWC Palosi to FWC Phari Pura and thereafter from FWC Phari Pur FWC Patwar vide order dated 20/09/2021, you are hereby informed regarding the filing of instant appeal*

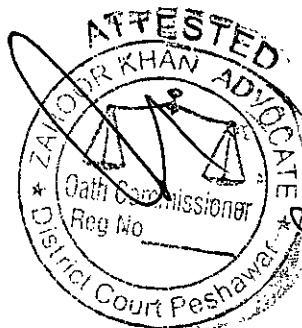
Dated:- 27/09/2021




Appellant

Through:-


Shoukat Khan Safi  
Advocate High Court

PHC Pvt Composing Center, Peshawar High Court, Peshawar  
Pioneer of legal drafting & composing  
Cell No:- +923028838600/+923119149544/+923159737151  
Email:- phc.pvtcomposing@gmail.com



قیمت 50 روپے	99926	  
ایڈوکیٹ: شہزادہ گل خان صاحب بار کونسل ایسوسی ایشن نمبر: BL-09-1377 رابطہ نمبر: 0321-9027612		
<b>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</b>		

بعدالت جناب: سروسز کمرہ ایسٹبلمنٹ KPK لیٹنار

منجانب: سائلہ - 	دعویٰ: سروسز ایسٹبل علت نمبر: مورثہ: جرم: تھانہ:
<b>باعث تحریر آنکہ</b>	

سعدیہ گل خان صاحبہ  
 شہزادہ گل خان صاحبہ  
 مسکن  
 خیبر پختونخواہ

Sadegh

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
 آن مقام کے لیے شہزادہ گل خان صاحبہ کے کارروائی کے لیے کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز ذیل صاحب کو  
 راضی نامہ کر کے وافر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہم کی تصدیق  
 زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا ایبل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے ایبل اگر انی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور ان کا ساختہ پر واضح منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانباً اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 27/09/2023

مقام \_\_\_\_\_ کے لیے منظور ہے۔

Accepted and  
 Attested

نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔