

18.08.2022

Tour to camp court Abbottabad has been cancelled, therefore, the case is adjourned on 20.10.2022 for the same.

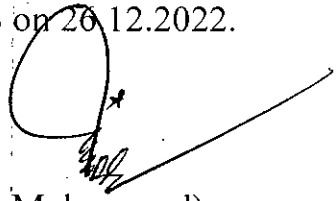

READER

20.10.2022

Nemo for the appellant. Mr. Muhammad Jan, District Attorney for the respondents present.

Previous date was changed on the strength of Reader's Note, therefore, notice be issued to the respondents for submission of reply/comments. Notice be also issued to the appellant as well as his counsel to attend the court on the next date. Adjourned.

To come up for reply/comments before the S.B on 26.12.2022.


(Mian Muhammad)
Member (E)

16.03.2022 Due to retirement of the Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same before on 18.05.2022


Reader

18.05 2022 Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant AG alongwith Mr. Ahmad Zaman, Assistant District Health Officer Haripur for the respondents present.


Written reply/comments on behalf of respondents not submitted. Learned AAG for the respondents sought time to submit the same on the fix date. Last opportunity is granted. To come for the same before S.B at camp court Abbottabad on 13.06.2022.



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

13.06.2022 Appellant in person present. Mr. Riaz Khan Paindakhel, Assistant Advocate General alongwith Ahmad Zaman, Assistant District Health Officer and Safi Ullah, Focal Person for the respondents present.

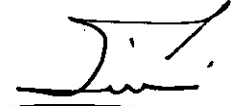
Reply on behalf of respondents is still awaited. Representatives of the respondent department seek time for submission of written reply/comments. Adjourned by way of last chance. To come up for written reply/comments on 18.08.2022 before S.B at Camp Court Abbottabad.


(Fareeha Paul)
Member (E)
Camp Court A/Abad

13.10.2021

Nemo for the appellant:

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel and to come up for preliminary hearing before the S.B on 29.12.2021 at Camp Court Abbottabad.



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

29.12.2021

Counsel for the appellant present. Preliminary arguments have been heard.

The appellant has impugned the order of respondent No. 3 dated 15.10.2020 regarding her removal from service on account of wilful absence. It is mentioned in the impugned order that show cause notice dated 29.04.2020 was issued directing the appellant to explain her position in written within 07 days or not more than 15 days of its delivery. It is further mentioned in the said order that no response has been received from her side, and finally her absence notice was published in daily newspapers on 20.09.2020 directing the appellant to report for duty and submit cogent reason for wilful absence. Learned counsel contends that the appellant submitted reply of the notice dated 06.03.2020 and this fact has been brought into notice of the appellate authority vide para 6 of the departmental appeal. However, the appellate authority has not decided the appeal having regard to said submission of the appellant alongwith others. Points raised need consideration. The appeal is admitted for full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 16.03.2022 before S.B at camp court, Abbottabad.

Appellant Deposited
Security & Process Fee

04/01/22

Chairman
Camp Court, A/Abad

FORM OF ORDER SHEET

Court of _____

Case No.- 2816 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/02/2021	<p>The appeal of Mst. Shahida Jabeen presented today by Mr. Muhammad Jahangir Khan 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 <i>[Signature]</i> 15/2/2021</p>
2-	18.06.2021	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>18-06-2021</u></p> <p>The appeal of Mst. Shahida Jabeen presented today by Mr. Muhammad Jahangir Khan 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;">CHAIRMAN <i>[Signature]</i></p> <p style="text-align: right;">REGISTRAR</p>
		<p>Due to COVID-19, tour to Abbottabad has been cancelled, therefore, case to come for the same as before on 13.10.2021.</p> <p>The appeal of Mst. Shahida Jabeen presented today by Mr. Muhammad Jahangir Khan 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;">Reader</p> <p style="text-align: right;">REGISTRAR</p>

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

2816
Service Appeal No. _____/2021

Mst. Shahida Jabeen V/S Govt. of KPK etc

SERVICE APPEAL

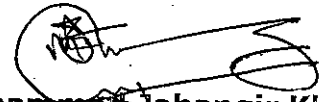
INDEX

S.No	Description of Documents	Annex	Pages
1.	Service appeal alongwith affidavit, CNIC and service card		1 - 9
2.	Copies of complaint and cutting of newspaper	"A&B"	10 - 11
3	Copies of application for maternity leave and order No.10222-27 dated 28.09.2018	"C&D"	12- 15
4	Copies of explanation and reply	"E&F"	16 - 17
5	Copies of removal order dated 15.10.2020 and attendance sheets	"G&H"	18 - 43
6	Copy of departmental appeal	"I"	44 - 46
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Dated: 12/01/2021


Appellant

Through Counsel


Muhammad Jahangir Khan
Advocate High Court/
Federal Shariat Court
At Haripur

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2021

Mst. Shahida Jabeen w/o Muhammad Asif (Ex-Clinical Technician Anesthesia) Type-D, Hospital Sarai Niamat Khan, District Haripur resident of Mohallah Awan Abad, Simlan Negar, Tehsil & District Haripur.

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Chief Secretary, Khyber Pakhtunkhwa Peshawar.
2. Director General of Health Services , Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, Haripur
4. Incharge Type-D Hospital Sarai Niamat Khan, Tehsil and District Haripur

....Respondents

=====
SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST ORDER NO. 13256-60 DATED 15.10.2020 PASSED BY RESPONDENT NO.3 OF REMOVAL FROM SERVICE UNDER RULE-9 OF KPK GOVERNMENT SERVANT (E&D) RULES 2011, HOWEVER, DEPARTMENTAL APPEAL HAS NOT BEEN DECIDED TILL DATE BY RESPONDENT NO.2 FILED ON 13.11.2020 WHEREIN THE IMPUGNED ORDER PASSED BY RESPONDENT NO.3 AGAINST APPELLANT IS ILLEGAL, UNLAWFUL, WITHOUT LAWFUL AUTHORITY WHICH IS LIABLE TO BE SET ASIDE.

PRAYER:

On acceptance of the instant service appeal, the impugned order # 13256-60 dated 15.10.2020 of respondents No.3 may graciously be set aside and the appellant may graciously be reinstated with all back benefits. Any other relief this Honourable Tribunal deems fit and proper may also graciously be granted just to meet the ends of justice.

=====

Most Respectfully Sheweth:-

Brief facts giving rise to the present service appeal are arrayed as under:-

1. That the appellant was appointed as Clinical Technician (Anesthesia) on 01.01.2011. The appellant always performed assigned duties with sincerity, devotion, dedication and commitment to the entire satisfaction of high-ups.
2. That the appellant had been performing the assigned duties as Clinical Technician (Anesthesia) at type D-Hospital Sarai Sarai Niamat Khan, Tehsil and District Haripura.
3. That the appellant's husband Muhammad Asif was also performing his duty in the same Type-D Hospital as Clinical Technician.

4. That the husband of appellant submitted complaint to SP-Haripur and SHO PS Saddar Haripur against the Respondent No.4 regarding objectionable and negative attitude toward appellant. The respondent No.4 even made publication against appellant in newspaper. Copies of complaint and cutting of newspaper are annexed as **Annexure "A&B"**.

5. That the appellant on 23.08.2019 moved application to respondent No.3 for maternity leave and appellant was on maternity leave and during maternity leave the respondent No.3 passed relieving order No. 10222-27 dated 28.09.2018. Copies of application and order No.10222-27 dated 28.09.2018 are annexed as **Annexure "C&D"**.

6. That the Respondent No.3 with the connivance of Respondent No.4 malafidely issued explanation vide letter No. 1862-64 dated 06.03.2020 on the basis of application No.22/20 dated 29.01.2020 illegally and unlawfully. The respondent No.3 with collusion of Respondent No.4 has taken revenge as the husband of appellant moved complaint against Respondent No.4 before S.P Haripur on 06.03.2020. Copies of explanation and reply are annexed as **Annexure "E&F"**

6. That the respondent No.3 with the collusion of respondent No.4 issued the impugned removal order of appellant vide No. 13256-60 dated 15.10.2020 whereas the attendance

register negates the version of Respondents No.3&4. Copies of removal order dated 15.10.2020 and attendance sheets are annexed as **Annexure "G&H"**.

7. That the appellant moved departmental appeal before Respondent No.2 but no any decision is given so far. Copy of departmental appeal is annexed as **Annexure "I"**.
8. That feeling aggrieved from the impugned removal order No. 13256-60 dated 15.10.2020 of respondents No.3, the appellant has now come to this Honourable Service Tribunal assailing, the impugned order being unwarranted at law and facts, inter-alia, on the following grounds: -

GROUND:

- (a) That the impugned order of Respondent No.3 is illegal, unlawful, without lawful authority, without jurisdiction, arbitrary, discriminatory, hence, liable to be set-aside.
- (b) That the appellant has not been treated by Respondents No.3 in accordance with law, rules on the subject and has violated the basic rights of appellant as guaranteed by the Constitution of Islamic Republic of Pakistan 1973, hence the impugned order is liable to be set aside.

(c) That respondent No.3 committed illegality by non compliance of provisions of KPK Govt. Servants (E&D) Rules 2011 and Govt. Servants (E&D) Rules 1973 as the Respondent No.3 has had no powers without fulfilling the requirements of law pass illegal order one sidedly. The respondent No.3 followed illegal process and passed illegal order without appointing inquiry officer or inquiry committee which is negation of law, the impugned removal order from service passed by respondent No.3 is not sustainable in the eye of law.

(d) That the respondent No.3 without issuance of any notice and without appointing inquiry officer and hearing of appellant, passed one sided removal order of appellant which is against the constitutional right of appellant. The respondent No.3 further violated the service laws and rules under which the Respondent No.3 was duty bound to follow procedural law, the Respondent No.3 under KPK Govt. Servants (E&D) Rules 2011 and Govt. Servants (E&D) Rules 1973 was duty bound to follow law of the land and inquiry officer or inquiry committee has not appointed malafidely.

(e) That august Supreme Court of Pakistan held ***"removal from service on the charge of***

absence from duty, allegations of inefficiency and not knowing his job. In the absence of such document, no adverse presumption or inference could be drawn against the civil servants conduct particularly in vies of the fact that medical slips issued by the Govt. Hospital were duly countersigned by the Medical Superintendent of Hospital. Allegations of inefficiency and not knowing his job were based on conjectures and were not based on any adverse entry in the Annual Confidential Report or backed by any inquiry carried out by the department". In the light of judgment of august Supreme Court of Pakistan the appellant is entitled to be reinstated with all back benefits by setting aside impugned order of respondent No.3.

- (f) That the August Supreme Court of Pakistan in judgment held that *"absence from duty without leave even if not willful but some being an act of disorder in service would constitute misconduct, charge against civil servant was not so grave as to propose any of such two penalties. Major penalty of compulsory retirement was harsh and did not commensurate with nature of charge"*. In the

light of judgment of August Supreme Court of Pakistan, the appellant is entitled for relief of reinstate, hence the impugned order is liable to be set aside.

(g) That the respondent No.3 has mentioned in explanation order that **"as reported by incharge Type-D Hospital S.N Khan vide his application bearing No. 22/20 dated 29.01.2020 that you were found absent from your duties since 3(three) years consecutively without prior permission or sanction of leave"** whereas attendance register record negates the version taken by respondent No.3 in impugned order, hence the order of respondent No.3 is liable to be set aside.

(h) That the Respondent No. 3 violated the golden principle of natural justice that "audi alteram partem", even the attendance register which checked and verified by respondent No.3 negates the version of Respondent No.4, whereas the respondent No.4 remained absent and did M.Phil degree from Hazara University and on complaint of appellant, the Respondents No.3&4 malafidely have taken revenge, hence the impugned removal order passed without hearing the appellant which is liable to be set aside.

(i) That the appellant filed departmental appeal but till date no any decision is given by respondent No.2 and the appeal is well within time and this Honourable Service Tribunal has the jurisdiction to entertain the same and be decided on merit just to meet the ends of justice.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, the impugned removal order No. 13256-60 dated 15.10.2020 13261-65 dated 15.10.2020 passed by respondent No.3 may graciously be set aside and the appellant may graciously be reinstated with all back benefits. Any other relief this Honourable Tribunal deems fit and proper may also graciously be granted just to meet the ends of justice.

Dated: 12/02/2021

Shahida
Appellant

Through Counsel

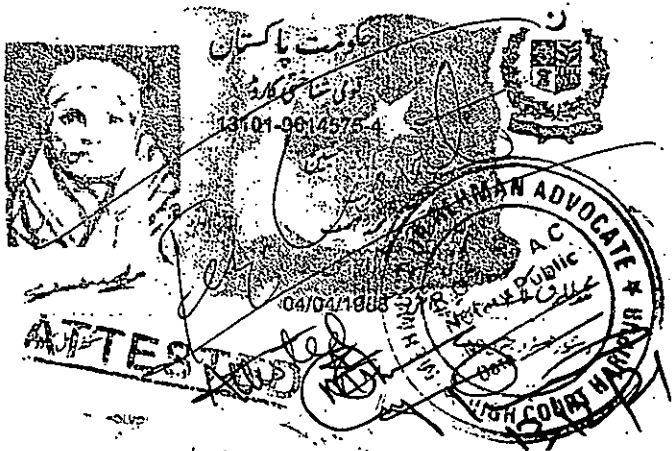
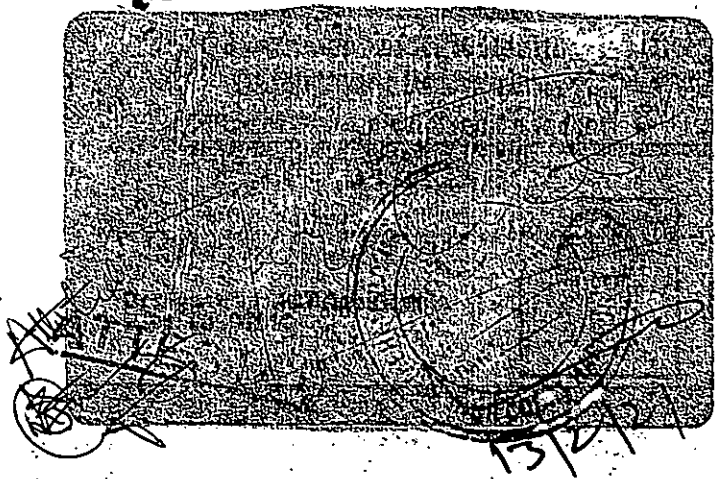
Muhammad Jahangir Khan
Muhammad Jahangir Khan
Advocate High Court
Federal Shariat Court
At Haripur

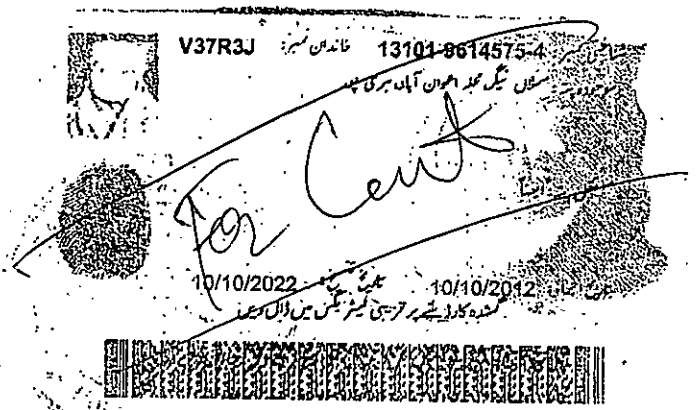
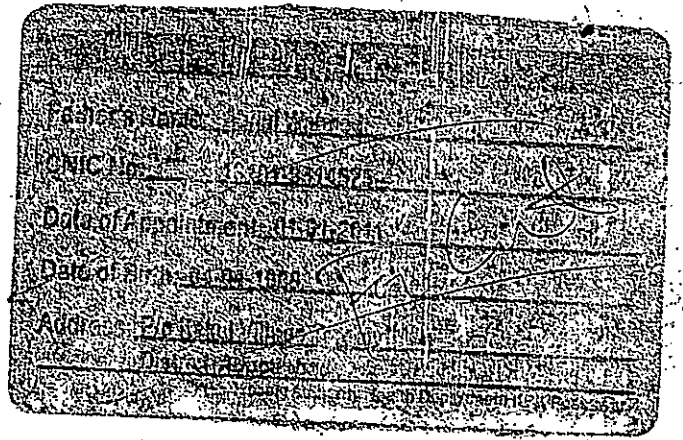
VERIFICATION

Verified that the contents of this appeal are true and correct to the best of my knowledge as per record made available to me and that nothing has been concealed therein.

Dated: 12/02/2021

Shahida
Appellant





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

Service Appeal No. _____/2021

Mst. Shahida Jabeen V/S Govt. of KPK etc

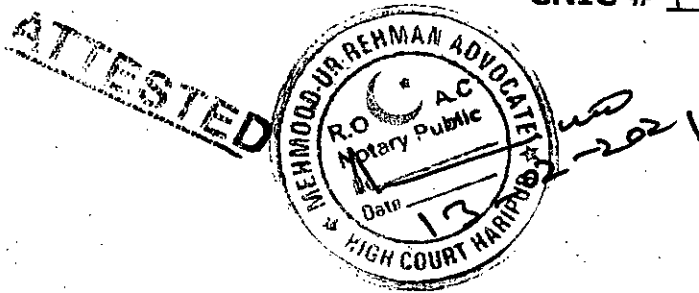
SERVICE APPEAL

AFFIDAVIT

I, Mst. Shahida Jabeen w/o Muhammad Asif (Ex-Clinical Technician Anesthesia) Type-D, Hospital Sarai Niamat Khan, District Haripur resident of Mohallah Awan Abad, Simlan Negar, Tehsil & District Haripur do hereby solemnly affirm and declare on oath that the contents of the foregoing service appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Dated: 12/02/2021

Shahida
Deponent
Mst. Shahida Jabeen
CNIC # 13101-9614575-4



A
10

محفوظ خباب اسپ کے ایجنٹ کیلئے

قدیم زمانہ میں خباب صاحب نے جس کی مدد سے...

Diary No 439
Dated 06-03-2020
District Police Officer
Muzaffargarh

نیا م
میراج گلشن کا پیسہ وافر کامیاب...

SHO Saddar
Take Enquiry
Report with
in two days

دو روزہ تفتیش اور رپورٹ جمع کی جانی
تا کہ دن کارروائی برسرِ طرف...

محفوظ خباب درخشاں نے...
پیشہ پرستی اور...

add 9/0 contact
B.3.2020

Attended
Muzaffargarh

پیشہ پرستی اور...
میراج گلشن کا پیسہ...
دو روزہ تفتیش اور رپورٹ...
محفوظ خباب درخشاں نے...
پیشہ پرستی اور...
میراج گلشن کا پیسہ...
دو روزہ تفتیش اور رپورٹ...
محفوظ خباب درخشاں نے...
پیشہ پرستی اور...
میراج گلشن کا پیسہ...
دو روزہ تفتیش اور رپورٹ...

1652/...

B

11

ماہنامہ عدالت سے مضمون ماہنامہ عدالت سے مضمون ماہنامہ عدالت سے مضمون
ماہنامہ عدالت سے مضمون ماہنامہ عدالت سے مضمون ماہنامہ عدالت سے مضمون

سرائے نعمت ہسپتال کی ٹیکنیشن تین سال سے غائب

سرائے نعمت خان (نامہ نگار) محکمہ صحت ہری پور کی موصول کردہ ہے محکمہ صحت ہری پور کے کریٹ ٹائل
محکمہ صحت ڈی ٹائپ ہسپتال سرائے نعمت خان کی اسٹور یا انفران کی کمی سے محکمہ ٹیکنیشن اب تک تنخواہ کی
ٹیکنیشن شاہدہ عین تین سال سے بغیر دیوٹی کے تنخواہ میں تقریباً 15 لاکھ وصول (باقی صفحہ 7 بقیمبر 46)

چمبہ باڑہ لیاں شریف کے عوام کلمہ عزا

درج کر لیا گیا اس لیے (باقی صفحہ 7 بقیمبر 29) دین اوی چس سے سرور

ٹیکنیشن نے ڈاکٹر پر ہتک عزت کا دعویٰ دائر کر دیا

سرائے نعمت خان (نامہ نگار) ڈی ٹائپ ہسپتال سے رجوع کر لیا ڈی ٹائپ ہسپتال سرائے نعمت خان
سرائے نعمت خان انجارج کے خلاف جگ عزت کا انجارج کی طرف سے فی میل ٹیکنیشن شاہدہ عین کے
دعویٰ متاثرہ ٹیکنیشن نے ڈاکٹر عظیم کے خلاف عدالت خلاف سن کثرت الزامات (باقی صفحہ 7 بقیمبر 30)

ماہنامہ تجاویزات کیخلاف

آپریشن تین وکانیں سیل

ماہنامہ (پیرور پورٹ) ماہنامہ میں تجاویزات
خلاف ایکشن ایڈیشنل اے سی نے کیمبر روڈ
دکانات سیل کر دی اس لیے (باقی صفحہ 7 بقیمبر 30)

اور زما عسراج ہفتہ شمارہ

Noted

End no 92 dated 29/8/19 TGH SMC

~~Handwritten notes in Urdu script, possibly a signature or title.~~

Handwritten notes in Urdu script, possibly a signature or title.

Handwritten note in Urdu script.

Handwritten notes in Urdu script, appearing to be a list or detailed notes.

Attended

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Handwritten signature or name.

Handwritten signature or name.

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Handwritten signature or name.

23/8/2018

Memorily leave for Mrs. Shahid Jabeen
Muneeb & Ahmed Health Officer
for necessary action please


Handwritten signature or name.

TGH SMC



District Head Quarter, Teaching Hospital, Haripur
Out Door Patients Department (O.P.D)

13

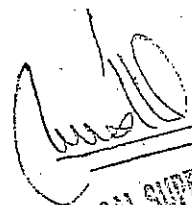
O.P.D No :-	853838	Rs:-	10
Name :-	Shahida Jabeen	Date & Time :-	21-Aug-2019 09:16:26
Gender :-	Female	Age :-	28 Years
Address :-	Haripur(Kpk)	District :-	Haripur, KPK
Patient I.D :-	119080421646	Patient Status :-	Routine
BarCode :-			


Rs :- Ten Only


Rx:-

Maternity leave certificate
It is certified that Mrs. ^{Jabeen} Shahida
w/o Asif is pregnant. Her
last Urine test of pregnancy is
advised 90 days maternity
leave w.e.f. 26/08/2019.
— 24/11/2019.

4/9


MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



Attended


14

w/o ASig

HBsAg -ive

Anti Hcv -ive

HIV -ive

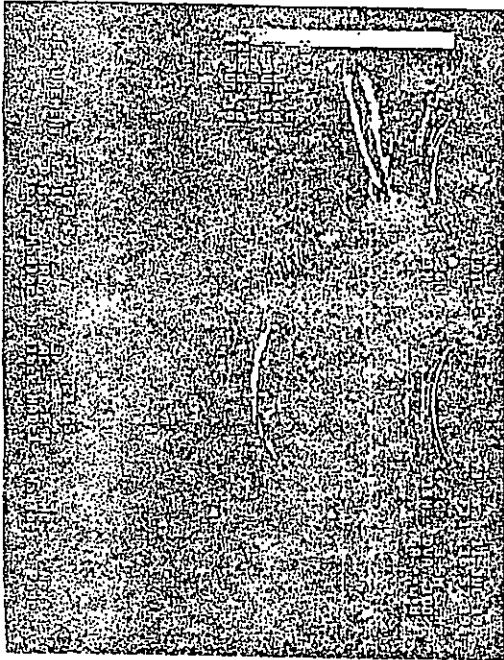
Hb 11.0 mg/dl

TLC 50400/mm³

Blood Group "A"

Rh Factor Positive

(A+ive)



P.T.O.

~~Attended~~
10/10/10



15

**OFFICE OF THE DISTRICT HEALTH OFFICER
HARIPUR.**

OFFICE ORDER.

Consequent upon the Director General Health Services Khyber Pakhtunkhwa Peshawar office order No.6825-31/AE-VI dated 26.09.2018. Mst. Shahida Jabeen PHC Technician (MP) / EPI BPS-12 working under the control of the undersigned at Type-D Hospital Sarai Niamat Khan is hereby relieved off her duties with effect from the forenoon of 28.09.2018 and directed to report to the District Health Officer Abbottabad within stipulated period.

Sd/.....
District Health Officer,
Haripur.

No. 10 222-27 /Estab/D/Relieving; dated Haripur, the

28/09/2018.

Copy forwarded to the: -

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar for information w/r to above please.
District Health Officer Abbottabad.
2. District Accounts Officer Haripur.
3. Coordinator DIHS undersigned office.
4. PMO i/c Type-D Hospital Sarai Niamat Khan.
5. Account Section undersigned office.
6. Official concerned.
For information and necessary action.

Attested
[Signature]

[Signature]
District Health Officer, 28/9/18
Haripur.

District Health Officer (BHU Kangra Colony) Hattar Road Haripur
Phone & Fax # 0995-610997
dhoharipur@yahoo.com



E-16

**OFFICE OF THE
DISTRICT HEALTH OFFICER, HARIPUR**
PHONE & FAX NO. 0995-353576
EMAIL: dhoharipur@yahoo.com

No. 1862-64 Dated 06/02/2020

Mrs. Shahid Jabeen Anesthesia Technician
Attached to Sarainaimat Khan.

SUB: EXPLANATION

As reported by Incharge Type-D Hospital S.N Khan vide his application bearing No. 22/20 dated 29/01/2020 that you were found absent from your duties since (3) three year consecutively without prior permission or sanction of leave.

Your this irresponsible and negligent attitude toward Govt. duties is highly offensive and against the service rules.

Therefore, you are hereby strictly directed to explain the solid reason of this irresponsible & negligent behavior within 03 days from the receipt of this communication, otherwise stern disciplinary proceeding will be initiated against you under the E&D rules 2011.

District Health Officer
Haripur

Cc:

1. Incharge Type-D Hospital S.N Khan with reference to his application for information.
2. Account section of the undersigned office to stop the pay of above named official with immediate effect.

Attested

District Health Officer
Haripur

Explanation

Page No 117

خبر غریب

F

گزارش ہے کہ آئندہ آگسٹ 1862 کے
 تحت بدلتے ہوئے حوالہ طلبی کی گئی ہے جسکی
 رپورٹ آئیے بطور خدمت ہے بدلتے ہوئے حوالہ طلبی سے احسن
 طریقے سے ڈیلر سیرام سے اسکی حوالگی رجسٹر
 ڈیلورٹ درخواست کے ساتھ ضلع سے بدلتے ہوئے حوالہ طلبی کے
 پر حسی شکایت کی گئی ہے۔ حتیٰ تا آج بھی حوالہ طلبی سے
 ڈیلورٹی کی گئی ہے۔ میں نے ڈاکٹر عظیم صاحب کو اسکی دفعہ میں
 نہیں دیکھا۔ میں قرآن پک پک کر پڑھتا ہوں اسکی بات
 کہنے کو تیار ہوں کہ میں نے اچھے ڈیلر احسن طریقے
 سے لیا ہے ڈاکٹر عظیم کی جو مددگار کی تجویز تھی
 ڈیلورٹ لاکھ سمیٹہ بنی ہے وہ ابھی تک اسکی دفتر میں
 ہیں اسکی دفعہ میں اور کچھ نہیں ہیں اسکی دفتر میں
 شہوت سے وہ ساری نسلوں سے پھر پھر رہے ہیں
 کی گئی ہیں اسکی مددگار سے ہے میں نے
 ایسے ہی کہنے کی جس میں سے پھر پھر رہے ہیں
 میں نے پھر پھر رہے ہیں

Accepted

اسکی مددگار سے
 اسکی مددگار سے
 اسکی مددگار سے



**OFFICE OF THE
DISTRICT HEALTH OFFICER, HARIPUR**

PHONE & FAX NO. 0995-353576

Email: dhoharipur@yahoo.com

No. 13256-60 Dated 15/10/2020

OFFICE ORDER

WHEREAS, Mst. Shahida Jabeen Clinical Technician Anesthesia BPS-12 attached to Type-D Hospital Sarai Naimat Khan Tehsil and District Haripur remained willfully absent from her duties since 19th Feb 2020 to till date, committed an act of misconduct which is liable to proceed under Rule 5(1)(b) and Rule 6 of Government Servants (Efficiency & Discipline) Rules 1973.

AND WHEREAS, the above mentioned official was directed to report and explain her position of absence, but the official did not resume duty neither submit her reply, afterward, this office again issued show cause bearing No. 4732-38, dated 29/04/2020 and directed to explain your position in writing within seven days or not more than fifteen days of its delivery but there is no response received from her side. Finally, at last an absence notice was published in daily newspaper on 20/09/2020 & directed the delinquent official to report for duty & submit cogent reason of willful absent to this office within seven (07) days of the publication, but she did not do so.

NOW, THEREFORE, in pursuance of Rule-9 of Khyber Pakhtunkhwa, Government Servant (E&D) Rules 2011, I Dr. Saifullah Khalid District Health Officer Haripur impose major penalty of removal from service upon Mst. Shahida Jabeen Clinical Technician Anesthesia BPS-12 attached to Type-D Hospital Sarai Naimat Khan with immediate effect.

Sd/....

District Health Officer
Haripur

Copy forwarded to the:

1. District Accounts Office Haripur.
 2. Coordinator DHIS of this office.
 3. Incharge, Type-D Hospital Sarai Naimat Khan.
 4. Account Section undersigned office.
 5. Official concerned.
- For information and necessary action.

District Health Officer
Haripur

19
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1

No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks			
01	DR. MUHAMMAD AZEEM M.D. S/o Muhammad Yashad	M.D.							Leave from Earned leave																											
02	MUHAMMAD ASIF S/o Muhammad Safdar	Surgical Tech.																																		
03	SHAHIDA JABEEN W/o Muhammad Asif	Masterclass Tech.																																		
04	AMIR SHAHZAD S/o Aftab Zib	Lab. Tech.																																		
05	MUHAMMAD SAJJAD S/o Muhammad Sultan	ward boy.																																		
06	KHAN AFSAR S/o Kala Khan	Sweeper																																		
07	REHMAN BEGUM W/o Idrees	L.H.V.																																		
08	RAHEEMA D/o M. Din	dai	P	P	P	P	P	P	P	P	P	P	P	P	P	P																				
09	Qaisar Khan S/o Tufail Muhammad	chowkdar																																		
10	Sajid Najeeb (S.P.) S/o Najeeb Ahmad																																			

Handwritten signature and initials.

Attendance Register of the TYPE-D MUSKIL/AL-SINX

FOR THE MONTH OF JUNE 2010
DATE AND HOURS OF ATTENDANCE

20

No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
1.	DR. MUHAMMAD ATEEM S/o Muhammad Aqshad	M.O	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
2.	MUHAMMAD ASIF S/o Muhammad Sajjad	Surgical tech	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
3.	SHAHIDA JABEEN w/o Muhammad asif	Anesth. tech	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
4.	RIFFAT BEGUM w/ m. Idrees	LHV	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
5.	YASIR RICKEN S/o Awwazib	Lab Tech	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
6.	MUHAMMAD SATIAD S/o Muhammad Sultan	ward boy	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
7.	SAYID NAZEER S/o Nazeen Ahmad	S-P	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
8.	KHAN AFSAR S/o Kala Khan	Sweeper	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
9.	Dr. Tahira Sultan D/o Ahmad Sultan	WOMD																																	

MORNING

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Attendance Register of the Type D Hospital 3/11/8
 DATE AND HOURS

For the Month of July 2018
 OF ATTENDANCE

21

Sl. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks		
01	DR. M. AZEEM S/o M. Arshad.	M.O	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Elect Duty	Present	Elect Duty	Present	Present	Present	Present	Present	Present	Present					
02	M. ASIF S/o M. Sajjad.	Surgical Tech.	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present				
03	SHAHIDA JABEEN W/o M. ASIF.	Anesthesia Tech.	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present				
04	RIFFAT BEGUM W/o M. Arrees.	LHV					Shifted																														
05	AMIR SHAHZAD S/o Auringzib.	Lab. Tech.	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present				
06	M. SAJJAD S/o M. Sultan.	Ward boy.					Shifted																														
07	SAJID NAZEER S/o NAZEER Ahmad	S.P					Shifted																														
08	KHAN AFSAR. S/o Kala Khan.	Sweeper	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present				
09	DR. TAHIRA SULTAN	WMO																																			
10	DR. SALMA	WMO																																			
11	Sajid Nazeer (S.P)																																				
12	MRS. Nazeer Sultan																																				

Daily Attendance Register of the Type-D Hospital S-N-K
DATE AND HOURS

For the Month of August 2018
OF ATTENDANCE

22

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
1.	DR. M. AZEEM	M.D.																																to morning only	
	S/o M. Ghoshad.																																		
2.	M. ASIF	Surgeon Tech.																																Applied for long leave from 24/8/18 - 12/9/18	
	S/o M. Sajdar																																		
3.	SHAHIDA TABEEN	Anestha Tech.																																Applied for long leave → leave scheduled from DHO A.I. via w/o m. Asif.	
	w/o m. Asif																																		
4.	RIFAT BEGUM	LHV																																Applied for leave	
	w/o m. Idrees																																		
5.	AMIR SHAHZAD	Lab Tech.																																	
	S/o Aurangzeb																																		
6.	M. SAJJAD	Ward boy																																	
	S/o M. Sultan																																		
7.	KHAN AFSAR	Swaper																																	
	S/o Kala Khan																																		
8.	DR. TAHIRA SULTAN	WMO																																	
	D/O AHMAD SULTAN																																		

TB & KPHCC & PNHAC
DHO A.I. & Training

Attendance Register of the _____
DATE AND HOURS

FOR THE MONTH OF _____
OF ATTENDANCE

No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks				
01	DR. M. AZEEM	M.O	Appt	Lab	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt	Appt				
S/o	Muhammad Ghrhad																																				Checked		
02	MUHAMMAD ASIF	Surgeon Tech.	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon			
S/o	Muhammad Sajdar																																				Checked		
03	SHAFIDA JABEEN	Anesthesia Tech.	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon				
w/o	Muhammad Asif																																						
04	AMIR SHAHZAD	Lab Tech.	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir			
S/o	Aurizingib																																						
05	MUHAMMAD SAJJAD	Ward boy	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward	Ward			
S/o	Muhammad Sultan																																						
06	KHAN AFSAR	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper	Sweeper				
S/o	Kala Khan																																						
07	Azra Bibi	LHV	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon	Surgeon			
8	Shaheer Jamil	Eni																																					
	Muhammad Jamil																																						
	Rizwana																																						
	S/o Ahsan Nawaz																																						
	Mrs. Rujat Begum	LHV																																					
	S/o Amrullah Khan																																						
	Mrs. Khem S/o	Chick																																					

23

Checked
6/4/18

On Leave from 18/04 To 28/04
Alternate Sweeper on duty Tanvir Shah

Shifted to morning shift since 14/4/2018.

Transferred from morning
to evening 14/4/2018

Shifted to Evening Shift
14/4/2018

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Daily Attendance Register of the <u>Type-D Hospital</u>																FOR THE MONTH OF <u>ATTENDANCE</u>											Total No. of Days	Remarks							
Sr. No.	Name	Rank	DATE AND HOUR														6	17	18	19	20	21	22	23	24	25			26	27	28	29	30	31	
1.	Dr. Muhammad Azeem	M.O	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	Sp. M. Irshad																																		
2.	Muhammad Asif	Surgeon Tech	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	Sp. M. Safdar																																		
3.	Shahida Tabassum	Anest. Tech	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	W/o M. Asif																																		
4.	Armi Shahzad	Lab. Tech	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	Sp. Anungzeb																																		
5.	Mrs. Azra Bibi	LHV	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	W/o Sheraz																																		
6.	Muhammad Sajjad	W. Lab	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	Sp. M. Sultan																																		
7.	Khan Afzar	Swachh	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	Sp. KRL Khan																																		
8.	Ashraf Khan	Chankhan	1	2	3	4	5	6	7	8	9	10	11	12	13	14																			
	Sp. M. Ashraf																																		

Checked
10/11/18

Daily Attendance Register of the TYPE-D HOSPITAL SA
DATE AND HOUR

For the Month of FEBRUARY
OF ATTENDANCE

25

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks		
01	DR. M. AZEEM S/O muhammad Arshad	M.D	W	W	W	X	W	W	W	W	W	W	W	W	W	W	W	X	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
02	MUHAMMAD ASIF S/O muhammad Saifdar	Surgical Tech	W	W	W	X	W	W	W	W	W	W	W	W	W	W	W	X	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
03	SHAHIDA JABEEN W/O muhammad Asif	Anesthesia Tech	SP	SP	SP	X	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	X	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP	SP			
04	AMER SHAHZAD S/O Auringzib	Lab Tech	Amir	Amir	Amir	X	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	X	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir		MORNING DUTY + TRAINING AT TBC HARBOR	
05	AZRA BiBi W/O Sheraz	LHV	AZ	AZ	AZ	X	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	X	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ	AZ		checked	
06	MUHAMMAD SATTAR S/O muhammad Sultan	Wind boy	M	M	M	X	M	M	M	M	M	M	M	M	M	M	M	X	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M		checked	
07	KHAN AFSAR S/O kala Khan	Sweeper	K	K	K	X	K	K	K	K	K	K	K	K	K	K	K	X	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K			
08	ARSHAD S/O muhammad Ashraf	Night chankidar	A	A	A	X	A	A	A	A	A	A	A	A	A	A	A	X	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		

checked
 5318
 Date: / / 18

Attendance Register of the TYPE-D HOSPITAL, FOR THE DATE AND HOUR OF ATTENDANCE

26

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
01.	DR. M. AZEEM S/o Muhammad Qasid	M.D.	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	
02.	MUHAMMAD ASIF S/o Muhammad Sajdar	Surgical Tech.	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
03.	SHAHIDA JABEEN W/o Muhammad Asif	Anesthetist Tech.	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S		
04.	AMIR SHAHZAD S/o Ausringzib	Lab. Tech.	T.B																																
05.	AZRA BIBI W/o Sheraz	LHV	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
06.	MUHAMMAD SAJJAD S/o Muhammad Sultan	ward boy	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	
07.	KHAN AFSAR S/o Kala Khan	Sweeper	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S		
08.	ARSHAD S/o Muhammad Ashraf	Night cleaner	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	

Amir

5/10

5/18

Checked

12/31

27

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Ren
1	Dr. Tahira Sultan D/o Ahmad Sultan	w/o M.C.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
2	M. Asif S/o M. Safdar	Surgico technician	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
3	Riffat Begum w/o M. Idrees	LHV	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
4	Amir Shehzad S/o Auwazzeb	Lab Tech Amir	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5	M. Ramzan S/o Kala Khan	w/o	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		

POLIO DUTY

long leave

MORNING DUTY

ON leave

on leave till 12/9/18

on leave

28

No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks			
1	DR. TAHIRA SULTAN S/O AHMED SULTAN	WMD	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P					
2	M. ASIF S/O M. SAFDAR	SURVIL TECH	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		Applied for leave		
3	RIFAAT BEGUM W/O M. SUREZ	LTV	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		Shifted to morning due to heavy work load in morning		
4	AMIR SHAHZAD S/O AURANGZEB	LAB TECH	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L				
5	KHAN AFSAR S/O KALA KHAN	SURVIL	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P				
6	Fazni Hussain																																					
7	AMIR SHAHZAD	LAB TECH																																				

6

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Name	RANK	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Rema	
1. DR-TAHIRA SULTAN S/O AHMAD SULTAN	WMO	P	P	P	CL	CL	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P				
2. M. ASIF S/O M. SAJJAD	SURGEON TECH.				GAP	LEAVE																													
3. RIFFAT BEGUM W/O M. JADEES	LHV	P	P	CL	P	P	P	P	P	P	P	P	P	P	P	P																			
4. AMIR SHEHZAD S/O AURANGZEB	LAB TECH	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir	Amir																			
5. KHAN AESAR S/O KALA KHAN	SURGEON	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
6. DR. SUSA PATEL	WMO				MORNING DUTY																														
7. Anshul Choudhary																																			
8. Bhakesh Jamiel W/O M. Jamiel	Dei																																		

← Applied leave time 12/2/2019 →

Waher
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D/O A. Su'atoh.

2- M. ASIF.

Spl M. Saldan Tech

3- Riffat Begum.

4- Khan Afzar. Sufyan

Spl Kala Khan.

5- Sharida Jabeen Anshari

6- DR. M. AZEEM M.D

Dr. Sasa Puryama

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MORNING - DUTY

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2.	M. ASIF	S/O M. SAFFAR	TECH	Surgeon
3.	RIFAT Begum	LHV	w/o M. BREEZ	
4.	SHAHIDA JABEEN	ANES- THESES	S/O M. ASIF	TECH
5.	KHAN AFSAR	SURGERY	S/O KAZA KHAN	
6.	AMIR SHAHZAD	LAS	S/O AHMAD GABER	TECH

Checked from morning duty
 2/1/19

Handwritten notes and signatures in the grid area, including names like 'Surgeon' and 'S/O M. SAFFAR' written vertically or diagonally.

3

1) MUHAMMAD ASIF OT
 S/P M. SAEDAR. Tech.

2) SHAHIDA JABREN ANIES
 W/P M. ASIF Tech.

3) RIEEAT BEQUIM
 W/P M. IDREES

4) KHAN AFSAR
 S/P KATA Khan
 SWEEPER

5) FAUKHARULDA
 (Dai)
 S/P

6) Amir Shahjahan
 S/P

7) Shaheen Jamil
 S/P

8) Yasir Khan
 S/P
 S/P clean Mahimud

1) MUHAMMAD ASIF OT
 S/P M. SAEDAR. Tech.

2) SHAHIDA JABREN ANIES
 W/P M. ASIF Tech.

3) RIEEAT BEQUIM
 W/P M. IDREES

4) KHAN AFSAR
 S/P KATA Khan
 SWEEPER

5) FAUKHARULDA
 (Dai)
 S/P

6) Amir Shahjahan
 S/P

7) Shaheen Jamil
 S/P

8) Yasir Khan
 S/P
 S/P clean Mahimud

12	Muhammad Asif Sp. Muhammad Saif Sp. Tech.	Surgeon	Pakistan	D	D	D	D
3	Shahida Tabson Wife Muhammad Asif	RN	Netherlands	Leave	-	-	D
14)	Riffat Begum Wife Muhammad Ali	RN	Pakistan	Leave	-	-	D
55	Khan Asgar Sp. Kala Khan	Surgeon	Pakistan	D	D	P	P
6)	Shakeen Jamil	Dent	Pakistan	Morning	-	-	-
7)	Muhammad Rangpur Sp. Kala Khan	RN	Pakistan	D	D	D	D
8.	Sajid Nazam	Dent	Evening	Dent	w.e F	27/11/2019	-

1	Muhammad Asif	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Shahida Jabbar	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
2	Khan Afzar	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Muhammad Saad	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
3	Sajid Nazari	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Shahid Jamil	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Muhammad Sajid	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Muhammad Agir	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	Muhammad Yousif	5/1/20	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P

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To

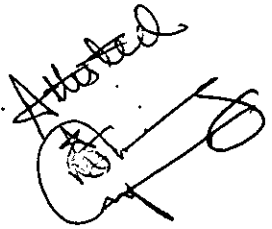
The Director General of Health Services,
Khyber Pakhtunkhwa, Peshawar.

SUB: REPRESENTATION/DEPARTMENTAL APPEAL FOR
REINSTATEMENT IN SERVICE WITH BACK BENEFITS.

Respected Sir,

The facts giving rise to the instant appeal are as follows:-

- (1) That the appellant was appointed in the Health Department against the post of Clinical Technician Anesthesia on 01-01-2011 and she had been performing the assigned duties in Type-D Hospital Sarai Niamat Khan, Tehsil & District Haripur. (Copy of Service Card is annexed as Annexure "A").
- (2) That the appellant's husband Mr. Muhammad Asif was also employed as Clinical Technician (Surgical) in the Health Department who had been performing the assigned duties in the same Type-D Hospital Sarai Niamat Khan, Tehsil & District Haripur.
- (3) That the appellant being aggrieved submitted the applications against the Medical Officer Type-D Hospital regarding his objectionable and negative attitude as well as his threats to the dire consequences to S.P. Haripur and SHO Police Station Sadar Haripur for legal proceedings under the law. (Copy of the application is annexed as Annexure "B").
- (4) That the appellant disclosed the facts pertaining to the negative attitude of the Medical Officer of Sarai Niamat Khan to his husband who also lodged a complaint against the said Medical Officer in different forums. (Copies of applications are annexed as Annexure "C").
- (5) That consequent upon the personal grudge of the said Medical Officer the appellant and her husband are being tortured mentally by using different tactics.
- (6) That PHO Haripur with the connivance of the other officials issued Explanation letter vide No. 1862-64, dated 06-03-2020 on baseless grounds, illegally, unlawfully, against the facts and law and the appellant gave the reply to the Explanation on credible grounds. (Copy of Explanation and reply thereon are annexed as Annexure "D&E") respectively.
- (7) That the appellant performed her duties regularly, honestly, dedicatedly, punctually and efficiently with zeal and zest which is evident from her past service record. It is worth mentioning

Attested


that the allegation regarding the absent from duties as levelled by DHO Haripur against the appellant is merely wrong and incorrect. The publication of notices in the News paper in this regard is also wrong, incorrect and against the facts merely to prove the case against the innocent appellant. The appellant never remained absent from her duties which is crystal clear from the attendance register. (Copies of daily attendance register and so called Notices published in the Newspaper are annexed as Annexure "F&G").

- (8) That the DHO Haripur and Medical Officer, Incharge of Type D Hospital Sarai Niamat Khan did not fulfill their legal and moral obligations and failed to comply the codal formalities.
- (9) That DHO was duty bound by law to provide the appellant an opportunity to defend herself against the allegations levelled against her. The DHO Haripur and Medical Officer violated the Golden Procedure of law that "No one could be condemned unheard".
- (10) That according to the natural justice and law that opportunity must be given to the person for defending his/her case, but in case of appellant no such opportunity was given with the malafide intention and ulterior motive.
- (11) That the Act and orders of both the officials were based on sheer violation of law.
- (12) That the impugned dismissal order is illegal, unlawful, against the facts and law, hence the order of imposing major penalty from the removal of services of the appellant is liable to be set aside and the appellant is entitled to be reinstated to resume her duties. (Copy of Office Order dated 15-10-2020 is annexed as annexure "H").
- (13) That both the officials penalized the appellant on the basis of personal enmity and grudge as well as political rivalry and personal whims.
- (14) That the impugned order of DHO Haripur is illegal, unlawful and against the facts and law, hence not maintainable in the eyes of law.
- (15) That the appellant was badly affected due to the malafide intention and personal grudge of both the officials.
- (16) That the appellant family has no other source of income except the current employment and she is supposed to look after and maintain her siblings who are studying in the different grades

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and classes, as the appellant's husband conducted 02 marriages and her entire family members have been effected financially due to the above said dismissal order.

(17) That the instant appeal is within time and this Authority has got jurisdiction to entertain and decide the matter by setting aside the impugned order issued by DHO Haripur.

PRAYER:

It is therefore humbly prayed that the order of major penalty/removal from services being illegal and unlawful, against the facts, law and rules of service may graciously be set-aside and the appellant be reinstated in services with all back benefits of the job.

Dated: 13-11-2020

Appellant


(Mrs. Shahida Jabeen)
Clinical Technician Anesthesia
Type D Hospital Safar Nizam
Khan District Haripur
Mahallah Awam
Simlan Neger Tehsil
District Haripur
Cell No. 3

A.No: 169

S.No: 87315

BC No:

Name of Advocate: محمد صالح زبیر خان

وکالت نامہ



D B A Haripur



Before The Honorable K.P.K Service Tribunal
 عنوان: Ms. Shahida Tabeen ^{Peshawar}
 منجانب: Service Appeal نوعیت مقدمہ: For Appellant
 باعث تحریر آئندہ:

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصدیقہ مقدمہ بمقام Haripur کے لیے
Muhammad Tahangji Khan

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت
 پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری
 غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب
 موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ
 ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے
 پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب
 موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختمہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو
 عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی
 اختیار ہوگا اور اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور
 اس کے تاشی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے پیر و نجات از کچہری صدر
 اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب
 موصوف کو بشرط ادا ہوگی علیحدہ مختانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ
 مذکور یا اس کے کسی جزو کی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کرے اور ایسے وکیل کو
 بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانب
 التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا کرے گا تو صاحب
 موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے
 برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ: 18/01/2024 دن 18/01/2024 سال 1446

Appellant -
 Ms. Shahida Tabeen

A.No: 484

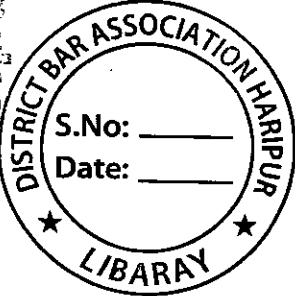
S.No: 87317

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BC No:

Name of Advocate: حجابی عارفہ طاہرہ

وکالت نامہ



Before The Honble K.O.K. Service Tribunal
 Mat Shuhida Tabeen Peshawar
 Service Appeal: نوعیت مقدمہ For Appellant: منجانب
 باعث تحریر آئیکہ:

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصدیقہ مقدمہ بمقام سروس ٹریبونل کے لیے

تاریخ عارفہ طاہرہ
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہونا ہوں گا اور بروقت
 پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری
 غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب
 موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ
 ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے
 پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب
 موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو
 عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی
 اختیار ہوگا اور اور کسی حکم یا ڈگری کرانے اور سرتم کار و پیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور
 اس کے ثالثی و راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے پیر و نجات از کچہری صدر
 اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب
 موصوف کو بشرط ادا ہوگی علیحدہ مختانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ
 مزکور یا اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو
 بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ
 التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب
 موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے
 برخلاف نہیں ہوگا۔

Amended by me

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ: 22/01/2018

18/01/2018

Appellant
 Mat Shuhida Tabeen

"B"

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

No. 2816 21

Appel No. Mst. Inayat Jabeen of 20
..... Appellant/Petitioner

Through Chief Justice Versus Sgt. M. I.
..... Respondent

Distt. Health Officer, Harspur
..... Respondent No.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

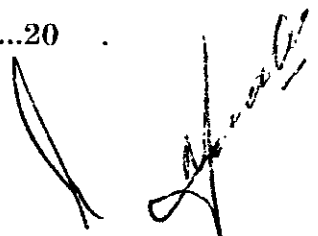
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 11/11

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20

at Camp Court A Road



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

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

No.

Appeal No. 28/16 of 20 21

TB

Appellant/Petitioner
Mrs. Inayatullah Jabeen

Respondent
through Chief Exec. Officer
Respondent No. 4

Notice to: —

1 on charge Type-D, Hospital Saraj
Niamat Khan Tehsil 2 Distt. Haripur

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....11/11.....

Day of.....Jan.....20 22

at Camp Court A-Ahead

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

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

No.

113

Appeal No. 2915 of 20 22

Mst. Shabana Jabeen Appellant/Petitioner

Versus

Director General of Health Services Respondent

Respondent No. 2

Notice to: - Director General of Health Services
Peshawar


WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13.01.22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this 11/1

Day of Jan 20 22

at Camp Court Peshawar


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

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

No.

73

Appeal No. 2815 of 2021.

Mr. Shahida Jabeen Appellant/Petitioner,

Versus

through Chief Secy to Pk PSM Respondent.

Respondent No. 5

Notice to:

Govt. of Pk through Chief Secy,
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 16-3-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this 14/3/2022

Day of Jan 2022.

at Camp Court Road

[Signature]
ISSUE OFFICER
REGISTRAR

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High-Court except Sunday and Gazetted Holidays.
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