

22nd July, 2022

Learned counsel for the appellant present and heard.

Against the removal from service order dated 13.07.2021, the appellant filed departmental appeal on 16.08.2021 which was not responded within the statutory period of ninety days and within next thirty days he filed this appeal which is within time. This appeal is thus admitted to full hearing subject to all just and legal objections by the other side. Out district respondents be summoned through TCS, the expenses of which be deposited by the appellant within three days, while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 23.09.2022 before S.B at camp court Abbottabad. The appellant shall also deposit security within 10 days.

Rs 500/-
Appellant Deposit
Security & Process Fee
2/8/22

(Kalin Arshad Khan)
Chairman
Camp Court Abbottabad

23.09.2022

Junior to counsel for appellant present.

Muhammad Jan, District Attorney alongwith Khalid Khan Assistant for respondents present.

Reply on behalf of respondents is still awaited. Representative of respondents requested for time to submit reply/comments; granted. To come up for reply/comments on 18.11.2022 before S.B at Camp Court, Abbottabad.



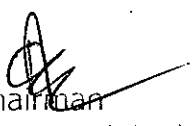

(Rozina Rehman)
Member (J)
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7867/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/12/2021	<p>The appeal of Farzana Bibi presented today by Mr. Syed Waqas Naqvi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	30.12.2021	<p>This case is entrusted to touring S. Bench at Abbottabad for preliminary hearing to be put there on <u>30/12/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>None is present on behalf of the appellant. Notice be issued to appellant and her counsel for the next date. Case to come up for preliminary hearing on 18.02.2022 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp Court, A/Abad</p> <p><i>18-2-22</i></p> <p><i>Due to retirement of worthy chairman case is adjourned to come up for the same on 22/2/2022.</i></p> <p style="text-align: right;"> REGISTRAR</p>

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

Case Title: FARZANA BISI vs SECRETARY F & ES

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Syed Waqas Naqvi Adv</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 pagged?	✓	
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 A.G/D.A.G?	✓	
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 cuttings/overwriting?		✓
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:

Syed Waqas Naqvi

Signature:

Waqas Naqvi

Dated:

14/12/2021

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKWA, AT PESHAWAR

Service Appeal No. 7867/2021

Farzana Bibi

...APPELLANT

V E R S U S

Secretary E&SE Khyber Pakhtunkwa, Peshawar and others

...RESPONDENTS

APPEAL

INDEX

S.No.	Description of Document	Annexure	Page No.
1.	Appeal alongwith affidavit and Certificate	--	1-13
2.	Copy of the appointment letter	"A"	14
3.	Copy of Service Book	"B"	15-22
4.	Copies of medical slips	"C"	23-43
5.	Copies of attendance register	"D"	44
6.	Copies of the medical Board letters	"E"	45
7.	Copies of application	"F"	46-49
8.	Copies of Account Statement	"G"	50-54
9.	Copy of removal order	"H"	55
10.	Copy of departmental appeal	"I"	56-58
11.	Vakalat Nama	--	59

...APPELLANT

Through:

Dated: 13/12 /2021

Waqas Naqvi
(SYED WAQAS NAQVI)
Advocate High Court

1

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKWA, AT PESHAWAR

Service Appeal No. 7867/2021

Farzana Bibi W/o Abdul Waheed R/o Muhallah Meelad Nagar P/o Khanpur
Tehsil Khanpur District Haripur

...APPELLANT

VERSUS

- 1) Secretary Elementary and Secondary Education Khyber Pakhtunkwa,
Peshawar
- 2) Director, Elementary and Secondary Education Khyber Pakhtunkwa
Peshawar
- 3) District Education Officer (Female) Haripur.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER / NOTIFICATION
NO.3917 DATED 13-07-2021 PASSED BY
RESPONDENT NO.3 DISTRICT EDUCATION
OFFICER (FEMALE) HARIPUR WHEREBY
MAJOR PENALTY OF REMOVAL FROM
SERVICE WAS IMPOSED ON THE APPELLANT

Respectfully Sheweth,

1. That, the appellant was initially appointed in the department as Lab Attendant (BPS-03) through endorsement No. 6953-27 dated 20-02-2010. **(Copy of the appointment letter is annexed as Annexure "A" and Copy of Service Book is annexed as Annexure "B")**
2. That, the appellant throughout her service of more than ten years has served the department with utmost devotion and dedication and in this long period of service, appellant has never committed any misconduct during service.
3. That the appellant unfortunately got diabetic due to which serious health issues like cardiac pains and sciatic pains caused to the appellant and her condition got worse with passage of time whereupon she was time and again referred to bed rest by the physicians. **(Copies of medical slips are annexed as Annexure "C")**

4. That, in the month of October 2020, appellant due to worst health issues become unable to attend the school and to perform her duties therefore, she applied for medical leave as recommended by doctors. ***(Copies of attendance register is annexed as Annexure "D")***
5. That, on the advice of doctors and the ailing health conditions, appellant applied for formation of Medical Board in the month of January, 2021 as per law and policy which was admitted for proceedings. ***(Copies of the medical Board letters are annexure as Annexure "E")***
6. That, after formation of medical board, appellant also moved applications to principal and respondent No.3 regarding the fact that she has already applied for medical board which is under process and due to illness she is not able to perform her duties furthermore and she was told not to come to school by the principal. ***(Copies of application are annexed as Annexure "F")***

7. That, appellant had attended the Medical Board Firstly in District Haripur which was later referred to Abbottabad where the doctors in Abbottabad who asked a letter from District Education Officer (Female) Haripur (Respondent No.3) which the respondent No.3 refused to provide and proceedings before medical Board could not be completed.
8. That since November 2020, respondents have also not disbursed the salary of the petitioner without assigning any reason. **(Copies of Account Statement is Annexed as Annexure "G")**
9. That vide office order No.3917 dated 13-07-2021, respondent No.3 illegally, without issuing any show cause notice and without fulfilling the legal formalities removed the appellant from service and sent the copy of removal order to the principal GGHS Julian Haripur. **(Copy of removal order is annexed as Annexure "H")**

10. That feeling aggrieved, appellant filed departmental appeal before respondent No.2 but after the lapse of three months, no order has been passed on the appeal filed by the appellant. **(Copy of departmental appeal is annexed as Annexure "I")**

11. That feeling highly aggrieved of the impugned order appellant has filed the instant service appeal inter alia on the strength of following grounds amongst other :-

GROUND:-

- a. That, the impugned order passed by respondent No.2 dated 13-07-2021 is illegal, against the law and facts, arbitrary hence liable to be set aside.
- b. That, the impugned order dated 13-07-2021 is perverse, fanciful, against the express provisions of law hence liable to be struck down.

- c. That the impugned order is against the fundamental rights of the appellant as enumerated in the constitution of Islamic republic of Pakistan 1973.
- d. That the appellant has been condemned unheard which is against the maxim "**AUDI ALTERAM PARTEM**" and is considered as a principle of fundamental justice and equity.
- e. That the removal order has been passed in blatant disregard of the law, rules and policy on the subject. No show cause notice have ever been served upon the appellant. Neither the appellant was called upon by any inquiry officer nor the opportunity of any personal hearing or written defense have been afforded to the appellant before passing the impugned removal order which is liable to be set aside by this Honourable Tribunal.
- f. That the impugned order has been passed in clear violation of KPK Government's Servant

(Efficiency and Discipline Rule) 2011, hence not tenable in the eye of law.

- g. That without giving opportunity of hearing to the appellant, major penalty of removal from service was awarded to the appellant which is illegal, without lawful authority, unwarranted based on malafide thus liable to be struck down.
- h. That the impugned order is against the principles of natural justice, equity and fair play.
- i. That the impugned order has been passed in violation of Article 4 and 10-A of the constitution and is against the principles laid down by the superior Courts in different judgments.
- j. That no charge sheet and statement of allegations have been served upon the appellant and also no right of personal hearing or written defence has been given to the

appellant before passing the removal order hence the removal order being illegal and arbitrary holds no water and is liable to be turned down.

k. That the appellant has also not been paid her salary since November 2020 till passing of the removal order dated 13-07-2021 without any reason which is against the law and principles laid down by the Honourable Apex Court on the subject.

l. That the appellant has always performed his duties with utmost devotion, dedication, zeal and zest and throughout service did not give and complaint to her superiors.

m. That all the allegation leveled in the impugned removal order dated 13-07-2021 are false and frivolous and are against the provisions of Government Servant (Efficiency and Discipline) Rules 2011 hence the impugned removal order is not tenable in the eyes of law.

- n. That it is pertinent here to mention that Medical board has been duly constituted on the application of appellant but due to the unfair attitude of the respondent No.3 proceedings could not be completed as the required documents / letter / NOC was not provided by the respondent No.3 on the basis of malafide and ulterior motives.
- o. That all the grounds mentioned in the impugned removal notification dated 13-07-2021 are totally wrong and against the facts. Had there been any show cause notice, charge sheet or inquiry, appellant must have joined the same but while passing the impugned order, law and policy on the subject has been adhered by the respondent and harsh penalty of removal has been awarded to the appellant.
- p. That the departmental appellate forum has also given no response to the appellant on departmental appeal therefore no other

remedy is left to the appellant except to file the instant appeal.

- q. That the appeal is well within time.
- r. That appellant is at verge of retirement and at this stage such like punishment will badly effect her pensionary benefits therefore the punishment awarded to the appellant is harsh unwarranted and unjustified.
- s. That the appellant craves gracious permission of this Honourable Court to raise further grounds during the Course of arguments.

PRAYER :-

It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned order dated 13-07-2021 passed by respondent No.3 whereby appellant was awarded major penalty of removal may please be declared illegal,

unlawful, arbitrary and be set aside and appellant may please be reinstated in service with all the back benefits. Moreover unpaid Salary w.e.f November 2020 till present may please be paid to the appellant in the best interest of justice. Any other relief as deem fit and appropriate in the attending circumstances may please be granted

...APPELLANT

Through:

Dated:- 13/12 /2021

Waqas Naqvi
(SYED WAQAS NAQVI)
Advocate High Court

VERIFICATION:-

Verified that the contents of the instant **Appeal** are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Court.

Dated:- 13/12 /2021

...APPELLANT

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKWA, AT PESHAWAR**

Service Appeal No. /2021

Farzana Bibi

...APPELLANT

VERSUS

Secretary E&SE Khyber Pakhtunkwa, Peshawar and others

...RESPONDENTS

APPEAL

AFFIDAVIT

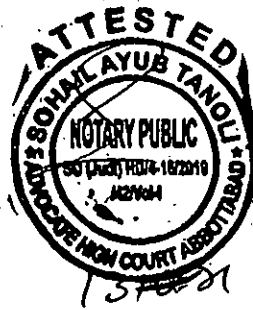
I, *Farzana Bibi W/o Abdul Waheed R/o Muhallah Meelad Nagar P/o Khanpur Tehsil Khanpur District Haripur appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

Dated: 13/12 /2021

فرزانه
... DEPONENT

IDENTIFIED BY:-

Waqas Naqvi
(SYED WAQAS NAQVI)
Advocate High Court



BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKWA, AT PESHAWAR

Service Appeal No. /2021

Farzana Bibi

...APPELLANT

V E R S U S

Secretary E&SE Khyber Pakhtunkwa, Peshawar and others

...RESPONDENTS

APPEAL

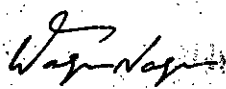
CERTIFICATE

*Certified that no such Appeal has earlier been filed
before this Hon'ble Tribunal.*

...APPELLANT

Through:

Dated: 13/12 /2021


 (SYED WAQAS NAQVI)
 Advocate High Court

(4)

ANNEXURE - "A"

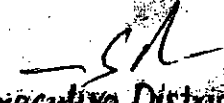
Office of the Executive District officer
Elementary & Secondary Education
Haripur

ORDER

As per provision contained in Sub -Rule (4) of Rule -10 of NWFP Civil servants (Appointment, Promotion, Transfer) Rules 1989 with the approval of the competent authority Mst Farzana Bibi D/O Muhammad Aslam Mother Name Begum Jan) ex caller late who died during the service w.e.f. 10-09-2004 is hereby appointed as I. Attendant against the vacant post in BPS-01 at GGHS Joulan with effect from the date of taking over charge on the deceased quota on the terms & conditions mentioned below under the prevailing rules in the interest of public service.

TERMS & CONDITIONS

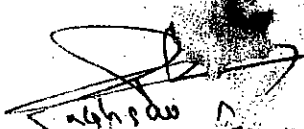
1. Her appointment is subject to the full fill all rules for recruitments of the post
2. She will placed at BPS mentioned against her with usual allowances as admissible to Govt servants of the same Pay scale.
3. She will provide the same facilities just like other regular Govt Employees as except pension, Gratuity, commutation etc.
4. She will avail the benefit of contributory Provident Fund (CPF) through 5% contribution of the minimum her pay and the Govt will pay 5% contribution.
5. She will not contribute GPF
6. She will be provided the Health & Age Certificate issued by the Medical Superintendent DHQ Hospital Haripur with in 15 days of issuance of this order.
7. The DDO concerned is directed to check her Original documents Domicile, NIC certificates.
8. She will be entitled for the salary from the date of taking over charge subject to the satisfaction of DDO concerned.


Executive District officer
Elementary & Secondary Education
Haripur.

Order No 693-57/ Dated: 20/02/2010

Copy for information to the:

1. The honorable MPA PF 49
2. The District Account Officer Haripur
3. The Headmistress GGHS Joulan & Tofkian.
4. Official Concerned
5. Office record.


District officer Female
Elementary & Secondary Education
Haripur

CTC
Waqar Naqvi
ATTESTED

(15)

ANNEXURE "B"

Note: The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1 Name: Farzana Bibi

2 Race: Awan

3 Residence: village Kotha Po. Khampur
Tehsil and District Heripur

4 Father's name and residence: Muhammad Aslam

5 Date of birth by Christian era as nearly as can be ascertained: 1971

6 Exact height by measurement: 5-6"

7 Personal marks for identification: Signe of wound on face

8 Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9 Signature of Government Servant

10 Signature and Designation of the Head of the Office, or other attesting Officer.

[Signature]
HEADMISTRESS
C. B. S. JOURNAL

[Signature]
ATTESTED

1 Name of Post	2 Whether substantive or officiating and whether Permanent or temporary	3 If Officiating (i) Substantive appointment or (ii) Whether service counts for pension under Art. 371 CSR	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emoluments falling under the term 'Pay'	7 Date of Appointment	8 Signature of Government Servant
4/1/14 LPHS Joulion	Temp		2970/-			20/02/2010	
- Do -			3060/-			1/12/2010	
- Do -		BPS-4800	4950/-			1/7/2011	
- Do -			5100/-			1/12/2011	
- Do -			5250/-			01/12/2012	
- Do -			5100/-			01/12/2013	
- do -			5550/-			01/07/2014	
- do -			5700/-			01/12/2014	
- do -		BPS-5100 (195-2060)	7380/-			01/02/15	
- do -		BPS-30 (6535-2614-25)	7835/-			01/07/15	
- do -			8095/-			01/12/15	
- do -							
- do -							
- do -		BPS-61 (1090-725-1770)	9990/-			01/07/16	

ATTESTED

Name of the head of office or other officer in position of 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismission etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period	Government to which debitable		
HEADMISTRESS GGHS JOULIAN	30/06/2011	S/Revised	[Signature]		Appointed as VATA vide EDO E + SEDU Haripur under Prdst No. 6953-57 dt-20-02-2010 Leave by D.O.E E + SE Haripur		[Signature]	
HEADMISTRESS GGHS JOULIAN	30/11/2011	A/One	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/11/12	A/One	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/11/13	A/One	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/06/14	one PM9	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/11/14	A/One	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/06/14	Scale Revised	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	07/2015	upgraded	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/11/15	A/One	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/06/16	Scale Revised	[Signature]				[Signature]	
Principal GGHS Joulian Haripur	30/11/16	A/One	[Signature]				[Signature]	

ATTESTED

Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating state (i) Substantive appointment or (ii) Whether service counts for pension under Art 371 G.S.R. 45	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of Appointment	Signature of Government Servant
KHAKS			Rs 10315/-			01/12/76	[Signature]
do			Rs 12340/-			01/07/77	[Signature]
do			Rs 12730/-			01/12/77	[Signature]
do			Rs 13125/-			01/12/77	[Signature]
do			Rs 13510/-			01/12/77	[Signature]
do			Rs 13900/-			01/12/77	[Signature]

2017
 Office of the Accountant General
 Khyber Pakhtunkhwa
 Peshawar
 Pay Fixed
 Rs 6510/-
 Pay Fixed
 Rs 7325/-
 Pay Fixed
 Rs 7740/-
 Pay Fixed
 Rs 8155/-
 Pay Fixed
 Rs 8570/-

ATTESTED

Accountant General
 Peshawar

9 Nature and Title of the head office or other posting officer in column 1 to 8	10 Date of termination of appoint- ment	11 Reason of termination (such as promotion, transfer, dismissal etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Period Government to which debitable		
Principal GHS Joulia Haripur	30-06-17	Revised	Principal GGHS Joulia Haripur		Services rendered 01-12-2012 to 30-11-2013 from Acq. Roll of other office.	Principal GGHS Joulia Haripur	
Principal Govt. Girls High School Joulia Haripur	30-11-17	Agree	Principal Govt. Girls High School Joulia Haripur			Principal GGHS Joulia Haripur	
Principal Govt. Girls High School Joulia Haripur	30-11-18	Agree	Principal Govt. Girls High School Joulia Haripur			Principal GGHS Joulia Haripur	
Principal Govt. Girls High School Joulia Haripur	30-11-19	Agree	Principal Govt. Girls High School Joulia Haripur		Services rendered to 30/11/14.	Principal GGHS Joulia Haripur	01/12/13- Acq. Roll is
Principal Govt. Girls High School Joulia Haripur	30-11-20	Agree	Principal Govt. Girls High School Joulia Haripur			Principal GGHS Joulia Haripur	
					Up graded from BPS-01 to BPS-03 vide Finance Deptt. U.P. K. Peshawar Notification No. FD/50 (FR)7 20/2015 dated 30/6/15	Principal GGHS Joulia Haripur	
					Services rendered to 30/11/15 from the Acq. Rolls and other office records	Principal GGHS Joulia Haripur	
					Granted 19/leave w.e.f. 18-07-16 to 27-07-16 (10 days) with full pay vide Director's Notification No. 5/30-32 dt. 18/06/16	Principal GGHS Joulia Haripur	

S 145
10/12/18
Change of Bank
01/12/2018
Principal
GGHS Joulia
Haripur
12/11/14

Wazir Naqvi
ATTESTED

11 1500

11

9	10	11	12	13		14	15	
Signature and designation of the head of the office or other attesting officer in attestation of Columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government	Government to which debitabale		
				Period	Government to which debitabale			
				<i>Sanction No 81980/228</i>				
				<i>579</i>				
				<i>1/11/16 DRO - GPE Adr</i>				
				<i>19-250901</i>				
<p>etc Wag Nagp</p> <p>ATTESTED</p>				<i>Granted Medical leave w.e.f</i>				
				<i>11/16 to 18/16 (08 days) on full pay</i>				
				<i>Vide DRO (F) Haripur Rndst No</i>				
				<i>222-23, dt # 06/01/2017</i>				

21

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government		
Signature and designation of the head of the office or other attesting officer in Column 1 to 8		Date of termination of appointment	Reason of termination (such as promotion, transfer, dismission etc.)	Signature of the head of the office or other attesting Officer	Reference to any recorded punishment or censure, or reward or praise of the Government/Serv		
					T.No. <u>89</u> Date <u>3/1/19</u> Drawn Rs: <u>40000/-</u> G/Fund Advance <u>1500</u>		
			And Graded leave to effect 13/05/19 to 15/05/19 (6 days) on full pay vide DRDO (10) Maripuu Budget No # 8126-31/ at # 11/06/19.		<i>(Signature)</i> D.A.O. Maripuu		

etc.
W. S. Naqvi
ATTESTED

22

15

9	10	11	12	13		14	15	
Nature and position of the head office or other officer in relation of units 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave: Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or reward or praise of the Government Servant.
					Period	Government to which debitable		
					Service transferred to Dept of A.C.G. rolls & other office records.			01/12/19. Acy rolls
					<i>Shakti</i> Genl. Secy High School, Jodhpur			

crc
Dash Nayak
ATTESTED

known T2DM

7-8 years

Inj. Humulin 70/30

I 20

R 20

T3-CETAL

ANNEXURE - "C"

- CBC, BSR
- Urea/R₂
- Urea/creatin
- ECG, HbA1c
- _____
- Fundoscopy

Dr. _____
 ڈاکٹر _____
 21/05/2021

etc
 Waqar Nadeem
ATTESTED

W

File
Add

DISTRICT HEADQUARTER HOSPITAL HARIPUR

at Doorstep
Facility
any/Sunday
and the
eg No.06104

Name of Patient Farzina (24) Age 25 Sex: Female

Ward/OPD: _____ Lab No: 81990 Date: 21-5-2021

SEROLOGY

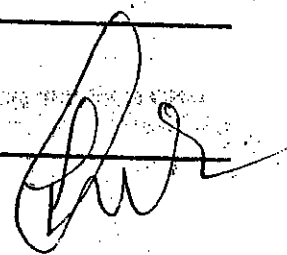
TEST	RESULT	RESULT
Hbs Ag <u>Wca = 63 mIU</u>	Negative	Positive
ANTI HCV <u>C-beatme = 1.7 mIU</u>	Negative	Positive
VDRL <u>Bsyfr = 490 mIU</u>	Negative	Positive
HIV	Negative	Positive
WIDAL TO	Negative	Positive
WIDAL TH	Negative	Positive
BRUCELLA ABOTUS	Negative	Positive
BRUCELLA MELITENSIS	Negative	Positive
TOXOPLASMA	Negative	Positive
DENGUE NSI	Negative	Positive
DENGUE IgM	Negative	Positive
DENGUE IgG	Negative	Positive
TYPHI DOT IgM	Negative	Positive
TYPHI DOT IgG	Negative	Positive
PREGNANCY TEST	Negative	Positive
RA FACTOR	Negative	Positive
A.S.O.T	Negative	Positive

Female

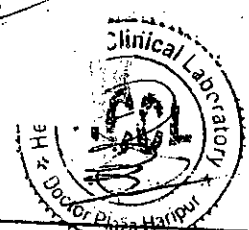
Pathologist
HQ Hospital Haripur

BLOOD GOURP. _____

ETC
Wasp/Flag
Lab Incharge



ATTESTED



Signature
Dr. Mazhar Iqbal Raja
M.B.B.S.(PAK) D.D.S.C (UK)
Master's in Dermatology (UK)

All Free Repeat Blood Test With in 24 Hr.
Shop # 2,3 Doctor Plaza Haripur
Ph: 0995-616724

Not for Medicolegal / Court Use

DISTRICT HEADQUARTER HOSPITAL HARIPUR

PATHOLOGY DEPARTMENT

Name of Patient Parzama 18/50 Age 49 Sex: Female
Ward/OPD: _____ Lab No: 81990 Date: 21-5-20

URINE EXAMINATION

PHYSICO CHEMICAL ANALYSIS

- COLOUR Red
- TURBIDITY _____
- SEDIMENT _____
- PH _____
- SPECIFIC GRAVITY _____
- GLUCOSE _____
- ALBUMIN _____
- KETONES _____
- BILE SALT nil
- BILE PIGMENT _____
- BLOOD _____

MICROSCOPIC EXAMINATION

- PUS CELLS 06-08 /HPF
- RED BLOOD CELLS 2-03 /HPF
- EPITHELIAL CELLS _____ /HPF
- BACTERIA _____ /HPF
- NUCLEUS THREADS _____ /HPF
- CASTS _____ /HPF
- CALCIUM OXALATES nil /HPF
- OTHERS _____

Pathologist
DHQ Hospital Haripur

LAB INCHARGE

ATTESTED

STC
Jagjit Singh

WIDE
WIDA
WIDA
BRU
BRU
TOX
DEN
DEI
DE
TY
TY
PI
R
A

Pal
DH

25

26

Collecting of Blood Sample at Doorstep
Multi Lab Collection Facility

Timings: Monday/Sunday
Open 24 and the City



Health Care

Clinical Laboratory[®]

KP.HCC/Reg No.06104

Acc. ID : 01-213329

Lab No. : 375

Patient Name : Farzana Bibi

Age / Sex : 49 Years / Female

Receiving Date : 21-05-2021

Reporting Date : 21-05-2021

Ref. By : Dr. Muhammad Akram Khan

Glycosylated Hb

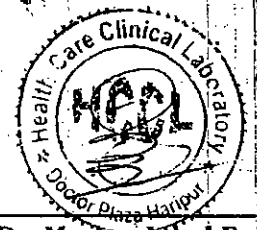
TEST

HBA1C 12.2 %

Normal: 4.0 - 6.0
For Diabetic Patients:
Goal: 6.0 - 6.5
Good Control: 6.5 - 8.0
Action Suggested: > 8

Note:- National Glycohaemoglobin Standardization Programmed Certified Method (NGSP).
International Federation for Clinical Chemistry (IFCC). FDA (USA) Certified.

ETC
Waqar Naqvi
ATTESTED



Signature

Dr. Mazhar Iqbal Raja
M.B.B.S.(PAK) D.D.S.C (UK)
Master's in Dermatology (UK)

Not for Medicolegal / Court Use

Please Call Free Repeat Blood Test With in 24 Hr.

Address: Shop # 2,3 Doctor Plaza Haripur
Ph: 0995-616724

District Head Quarter, Teaching Hospital, Haripur
Out Door Patients Department (O.P.D) 27

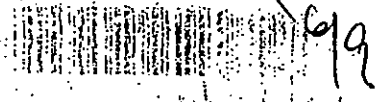
302064
Farzana Bb
Female Age :- 40 Years
Haripur
D :- 121050211445

Rs:- 10
Date & Time :- 22-May-2021 10:44:29
District :- Haripur, KPK

Patient Status :- Routine



Farzana Bb
Female
Haripur
121050211445



DMT. 10yrs

fundus ok
no cluster
clung

HT or clung

8yr

NV → NB
→ 1.75DS
NB

Adv. glass
+1.75DS - 8yrs

etc
Waqar Nagi
ATTESTED

Eye Surgeon
Dr. Muhammad Iqbal Khan
MBBS, MCPS, FCPS

Enter By :- Waheed Khan

OPD01

Rs :- Ten Only

Head Quarter, Teaching Hospital, Haripur (28)
Out Door Patients Department (O.P.D)

No: 170163
Name: Farzana
Sex: Female
Age: 49 Years
Address: Haripur
I.D: 120100213491
Barcode

Rs:- 10
Date & Time :- 15-Oct-2020 10:18:32
District :- Haripur, KPK
Patient Status :- Routine

Rs :- Ten Only

Handwritten notes: "Please Bed at home for (or) all" and "A.P.O.A" circled.

Handwritten: "h"

Handwritten: "Cap Regali" with a circled "010" and "3" below it.

Handwritten: "Tab Mornorm 8" with a circled "010" and "8" below it.

Handwritten: "Tab Mylaron" with a circled "020" and "18" below it.

Signature of Dr. Shauab Khan
ڈاکٹر شاہراہ انگیز خان
ایم بی بی ایس - ایف سی بی ایس
ہسپتال ہریپور

ATTESTED
Handwritten: "CTC" and "W. S. M. S. S. S."

Enter By: Shauab Khan

OPD01



(29)

HAZARA Clinical Laboratory

Address: Opposite T.H.Q Hospital New Khanpur, Haripur
 • Reg No: HRA/500/F/HR/GP/28

Name: Farzana Bibi Age: - Gender: Female

Examination Required: BSR Ref. By: Self

Lab Report

Date: 21/01/2020

URINE ROUTINE EXAMINATION

INVESTIGATION	RESULT	NORMAL RANGE
Colour		Yellow
Sp. Gravity		1.003-1.025
Ph		4.5 - 7.5
Protein		NIL
Glucose		NIL
Ketone		NIL
Bilirubin		NIL
Urobilinogen		0.1
Leukocytes		NIL
Blood		NIL
Nitrite		NIL

MICROSCOPIC EXAMINATION

PUS Cell's		/HPF
RBC'S		/HPF
Epithelial Cell's		/HPF
Bacteria		/HPF
Crystals		/HPF
Mucous Threads		/HPF
Cast		/LPF
Others		/HPF

SEROLOGY

TO _____

TH _____

Typhoid IgG _____

Typhoid IgM _____

Iso Titre _____

Ia Factor _____

uberculosis (ICT) _____

BsAG _____

CV _____

V (ICT) _____

pylori _____

ucella (Abortus) _____

ucella (Melitensis) _____

RL (ICT) _____

oplasma _____

P (Qualitative) _____

ATTESTED

BLOOD GLUCOSE

TEST	RESULT	NORMAL RANGE
Glucose Fasting		70-110
Glucose 2Hrs ABF		75-125
Glucose Random	<u>427</u>	80-160

RENAL PROFILE

Urea		mg/dl 15-45
Creatinine		mg/dl M:0.6-1.1 F:0.5-0.9

LIVER PROFILE

S. Bilirubin (Total)		mg/dl 0.1-1.0
SGPT(ALT)		u/l Up to 41
Alk Phos(ALP)		u/l Adult: Upto 270 Child: 820

LIPID PROFILE

Cholesterol		mg/dl Upto 200mg/dl
Triglycerides		mg/dl 80-220mg/dl
LDL		mg/dl <130-55mg/dl
HDL		mg/dl 35-55mg/dl

OTHERS

Calcium		mg/dl M: 8.1-10.5 Child: 8.8-12
Uric Acid		mg/dl M: 3.4-7.0 F: 2.5-6.0
Amylase		(<120 Au/dl)
Bilirubin (Direct)		mg/dl upto 0.25
Bilirubin (Indirect)		mg/dl upto 0.75

OTHERS

Blood Group _____ Rh Factor Y

Hb: _____ (Male: 12-16 g/dl) (Female: 11-14 g/dl)

Pregnancy Test: _____

MP(IGT) pv _____ pf _____

Not Valid For Court Signature

(30)

DHO HOSPITAL HARIPUR

ECHOCARDIOGRAPHY REPORT

Name	Farrava	Date	22/5/21
Age	50 year	Sex	

M. MODE MEASUREMENT & CALCULATIONS

IVD (End Diastole)	<input type="text"/>	mm (9-26)	L.V. Volume (Diastole)	<input type="text"/>	ML
IVDD (End Diastole)	48	mm (35-57)	L.V. Volume (Systole)	<input type="text"/>	ML
IVSD (End Systole)	28	mm (Variable)	L.V. Stroke Volume	<input type="text"/>	ML
PW (End Diastole)	11	mm (6-11)	L.V. Cardiac Output	<input type="text"/>	L/MIN(5.5-3.5)
AS (End Diastole)	12	mm (6-11)	L.V.E.F	48	% (57-73%)
Atrium (End Systole)	<input type="text"/>	mm (19-40)	L.V.F.S	24	% (25% or above)
Aortic Root (End Diastole)	<input type="text"/>	mm (20-37)	E.P.S.S.	<input type="text"/>	mm (6mm or less)
Aortic Valve Separation	<input type="text"/>	mm (15-26)	Mitral Valve Area	<input type="text"/>	cm

DOPPLER STUDY:

Aortic Valve Flow	Normal <input type="checkbox"/>	Regurgitant <input checked="" type="checkbox"/>	Stenotic <input type="checkbox"/>	Peak Gradient	<input type="text"/>	mmHg
Mitral Valve Flow	Normal <input type="checkbox"/>	Regurgitant <input checked="" type="checkbox"/>	Stenotic <input type="checkbox"/>	Mean Gradient	<input type="text"/>	mmHg
Tricuspid Valve Flow	Normal <input type="checkbox"/>	Regurgitant <input checked="" type="checkbox"/>	Stenotic <input type="checkbox"/>	Peak Gradient	<input type="text"/>	mmHg
Pulmonary Valve Flow	Normal <input type="checkbox"/>	Regurgitant <input checked="" type="checkbox"/>	Stenotic <input type="checkbox"/>	Mean Gradient	<input type="text"/>	mmHg

MODE MEASUREMENTS & CALCULATIONS:

→ N → sized CO is fair w/ slight turbulence
 - SWMA → mild Hypokinesia distal 1/3 of lateral wall
 - mild concentric HT

FINAL ECHOCARDIOGRAPHIC DIAGNOSIS:

→ IHD is moderate w/ slight turbulence
 - mild HT

etc
 Waqar Akbar
ATTESTED

Dr. M. Amir Khan <small>INCHARGE ICU/CCU DHO Hospital Haripur.</small>	Dr. Naved Akbar	Dr. Hafiz Waqas	Dr. Hamid
--	-----------------	-----------------	-----------

OUT DOOR PATIENT TICKET

31

CRP No. 2483

Facility Name

Name Farhad Age 40 Sex

Father's/Husband's Name

Monthly OPD Serial No

Provisional Diagnosis

Date	Clinical Findings / Investigations / Treatment / Referred / Test Findings
23/9/2	<p>Gen</p> <p>Body Aclm</p> <p>Res</p> <p>Tab Nims 100ml</p> <p>Tab Obvate D(30)</p> <p>Tab D Tris (4)</p> <p>Tab Tris (4)</p>

A
V
H
W
W
BR
BR
TC
DI
DI
DI
T
T
P
R
A

Pa
DI

CTC
Waqar Noor
ATTESTED

32

Refer

OUT DOOR PATIENT TICKET

District _____ CRP No. 2565

Facility Name _____

Name J. J. [unclear] Age 40 Sex _____

Father's/Husband's Name _____

Monthly OPD Serial No. _____

Provisional Diagnosis _____

Date
24/12/20

Clinical Findings / Investigations / Treatment / Referred / Test Findings

Adv.:
Refer to D. H. O. Hospital
for surgical pain +
management + investigations
of

CTC
[Signature]

ATTESTED

V
F
V
V
E
E

med / Test

33

Sent To: _____

OUT DOOR PATIENT TICKET

District 19/c/c CRP No. _____

Facility Name THQ. Kharpur.

Name Fozzara Age 40y Sex F

Father's/Husband's Name _____

_____ K.P.

Monthly OPD Serial No. 427/16

Provisional Diagnosis _____

Date Clinical Findings / Investigations / Treatment Referred / Test Findings

22/9/20

%

D

Pain @ leg
- Abdomen
by walking

Number (R)
Jog.

OLE
At 11h

BP 110/70

Ad ->

MRI @ leg
CP
P.B.S.

1. 4. Teradd
1-5 days

2. 4. Metycose
1-5 days

3. T. Diclotal
1-5 days

4. T. Morph
1-5 days

5. T. Metycose
1-5 days

6. Bed rest
x 03 days

7. Review by
Orthopaedic surgeon

V
H
W
W
B
B
T
E
I
I

etc
Waghtla
ATTESTED

34

OUT DOOR PATIENT TICKET

District Haripur CRP No. _____

Residence Name Tilal 128

Name: Fazans Age: 43y Sex: _____

Father's/Husband's Name: KP

Monthly OPD Serial No. _____

Provisional Diagnosis: _____

H
W
W
BI
BI
T
D
D
D
T
T
F
F
A
Pa
Di

Date Clinical Findings / Investigations / Treatment / Referred / Test Findings

→ Leg pain, radiate to neck
and for 2-3 year
sign of sialica.
→ Inj. Diclo stae

Adv 2 Adv - Rest for one day. 1.
26/9/2020
X-ray
→ Ref to DHQ
Lambo-Saeral
NRE
Kari pur
Dufms

etc
Waq Nagra

ATTESTED

35

Record Test Findings

Send To: **OUT DOOR PATIENT TICKET**

District: Haripur CRP No: _____

Facility Name: Uda 14 P

Name: Farzans Age: 434 Sex: _____

Father's/Husband's Name: KP

Monthly OPD Serial No. _____

Provisional Diagnosis: _____

Date	Clinical Findings / Investigations / Treatment / Referred / Test Findings
	<p>→ Leg pain, radiate to neck and - for 2-3 year sign of spondylosis.</p> <p>→ Inj. Diclo. stae</p>
Adv 2	<p>Adv - Rest for one day. 26/9/2020</p>
X-ray Lumbo-Sacral - joint	<p>→ Ref to DHQ Haripur</p>
MRE	<p><i>[Signature]</i></p>

ATTESTED
 etc
 Wagon bag

36

24 HOUR SERVICES

Perfect CT Scan

Doctor Plaza, opposite Ayub Medical Complex, Abbottabad

E-mail: pmc_atd@hotmail.com, Phone: 0092-355486 - 0344-9125609

Date: 07.10.2020

MRI LUMBOSACRAL SPINE

CLINICAL DATA: LBP

EXAMINATION TECHNIQUE:

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

REPORT:

L1/L2: Disc bulge is noted with no neural tissue compromise.

L2/L3: Circumferential disc bulge is noted causing compression of thecal sac, bilateral lateral recesses, exit foramina and nerve roots. Moderate spinal canal stenosis is noted.

L3/L4: Circumferential disc bulge is noted causing compression of thecal sac, bilateral lateral recesses, exit foramina and nerve roots. Moderate spinal canal stenosis is noted.

L4/L5: Circumferential disc bulge with posterior median protrusion is noted causing compression of thecal sac, bilateral lateral recesses and exiting nerve roots. Spinal canal obliteration is noted.

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

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:

Degenerative changes lumbar spine most marked at LV- 4/5 with spinal canal obliteration and bilateral neural tissue compromise

Dr. Anis Johnson,
MBBS, MCh, FRCR
Radiologist
Abbottabad

CIC
Waqar Azeem
ATTESTED

Not Valid for any Court



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

(11)

37

O.P.D No :- 308124 Rs:- 10
 Name :- Farzana Date & Time :- 28-May-2021 09:14:36
 Gender :- Female Age :- 50 Years District :- Haripur, KPK
 Address :- Haripur(K.P.K)
 Patient I.D :- 121050717504 Patient Status :- Routine
 BarCode :- *121050717

Rx:-

B.P 160/90
2CG

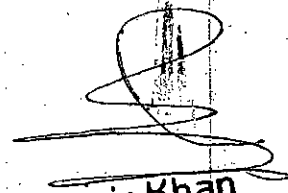
Adu

Car - Agio IP of

Aic RWP

How
(160)?

Pulse 88
BP 130/80


Dr. M. Amir Khan
 MBBS, RMP, M.D Cardiology
 Consultant Cardiologist / Medical Physicist
 INCHARGE ICU/CCU
 HQ Hospital Haripur

etc
w/af/Abg/E
ATTESTED

Enter By :- Nazia Malik

OPD03

File
No. 10



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

~~OPD No. 212521~~ (38)

O.P.D No :- 212521 Rs:- 10
 Name :- Farzana Bb L Date & Time :- 27-Jan-2021 12:10:44
 Gender :- Female Age :- 51 Years District :- Haripur, KPK
 Address :- Haripur (Kpk)
 Patient I.D :- 121010218119 Patient Status :- Routine

BarCode :- 

Rx:- c/o. ~~Farzana Bb~~ Farzana Bb
(Backache)
 Numbness of
 Rt Leg & Foot
 & with paresthesia

CT-SCAN
 Report → Degenerative changes
 - in Lumbar spine marked
 at L4-L5 - with spinal canal
 stenosis (documented)

W. Bed. Rest For Two weeks
 w.e.f. 27/01/21

ATTESTED

Dr. Farzana Bb
 Medical Superintendent
 Teaching Hospital
 Haripur

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

39

302368

Rs:- 10

Farzana Bk

Date & Time :- 22-May-2021 12:05:22

Female Age :- 49 Years

District :- Haripur, KPK

Haripur

Patient Status :- Routine

121050211749



302368
Farzana Bk
Female Age :- 49 Years
Haripur
121050211749

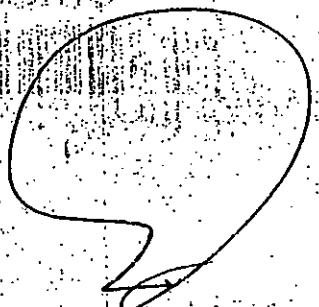
Hivatalis

Dr. [Signature]

Dr. Javed [Signature]

Dr. Khan [Signature]

Dr. Mattoo [Signature]

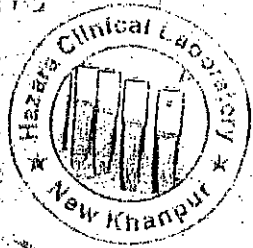


CTC
Waqar
ATTESTED

Enter By: Waheed Khan OPD01

Rs: Ten Only

40



HAZARA Clinical Laboratory

Facility Available For
Home Collection

Multi-Lab Collection Facility

Reg No: HRA/500/F/HR/GP/28

Name: Farzana Bibi

Ward No: **

Age/Sex: ** yrs / Female

Specimen: Blood

Reporting Date: 12-05-2021

Ref By: OPD

SEROLOGY

TEST NAME

RESULT

Typhidot IgM

Slightly Positive

Typhidot IgG

Negative

Note: Test is performed by ICT method, further confirmation done by ELISA/PCR. Please correlate clinically.

*etc
Waqar Nadeem*
ATTESTED

Signature 


Not for Medico legal / Court Use

Regret if there is any Typing Error

Address: Opposite T.H.O Hospital New Khanpur, Haripur

Incorrect Results? Please Contact lab within 24hr. for free repeat any one blood test.

Feedback

 0313-5727293

 www.facebook.com/hcl.khanpur

 hcl.khanpur@outlook.com



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

21

41

O.P.D No :- 375869
Name :- Farzana
Gender :- Male Age :- 50 Years
Address :- Hari Pur
Patient I.D :- 12108025874

Rs:- 10
Date & Time :- 05-Aug-2021 12:15:04
District :- Haripur, KPK
Patient Status :- Routine

BarCode :- 

Rx:-

210 mg
→
Lecithin

Referral to A.T.H. Asst
Cardiac Surgeon for
further management

Dr. Haris Khan
MBBS, FCPS (Surgery)
Consultant, Cardiology & Thoracic Surgery
RICHARDSON
D.S. Hospital Haripur

Page 88
06-138
21
3

etc
Waqar Khan
ATTESTED

Enter By :- Waheed Khan

01/21

Dr. Tariq Only

Patient seen & examined

known T2DM

7-8 year

Inj. Humulin 70/30

I 20

R 20

Insulin

DA

→ CBC (BSR) → uncontrolled 496 mg/dl

→ Urea/E₃

→ Urea/creat

→ ECG, HbA1c

→ IHD/LABE

→ Endoscopy → OK

⇒ NO UTI

⇒ adenomyolysis/retroperitoneum 17/6/21

Cor. Artery → SUD →

Also → Cardiac Surgery op.

Cardiac Surgery not available in DHQ Haripur. Referral to tertiary care hospital (Cardiac Surgery) for final opinion.

Dr. M. Amir Khan
21/05/2021

Dr. M. Amir Khan
MBBS, RMP, M.D. Cardiology
Consultant Cardiologist / Medical Officer
INCHARGE ICU/CCU
DHQ Hospital Haripur

Refer to Cardiology for further workup/management and opinion regarding cardiac condition/patient to not do any work stress/job continuation.

Dr. M. Amir Khan

22/5/21

Pt is having active IHD. She needs further workup regarding her disease. (Cardiac Rx) She should avoid heavy strenuous work and should take medicine properly.

ATTESTED

Dr. M. Amir Khan
MBBS, RMP, M.D. Cardiology
Consultant Cardiologist / Medical Officer
INCHARGE ICU/CCU
DHQ Hospital Haripur

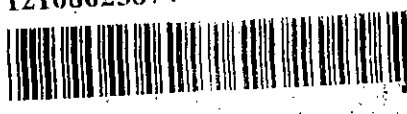
Dr. Amir Khan



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

5/

43

O.P.D No :- 375869
Name :- Farzana
Gender :- Male Age :- 50 Years
Address :- Hari Pur
Patient I.D :- 12108025874
BarCode :- 

Rs:- 10
Date & Time :- 05-Aug-2021 12:15:0
District :- Haripur, KPK
Patient Status :- Routine

Rx:-
SP Anjo
Suresh

Referral to ATHA A&E
Cardiac Surgery for
Fulminant myocarditis

Dr. H. Amir Khan
MBBS, MRCP, FRCR, FICM
Consultant Cardiologist / Intensive Care
INCHARGE ICU/CCU
DHQ Hospital Haripur

Pulse 88
AB-138
SW
3

CTC
Waqar Khan
ATTESTED

Enter By :- Waheed Khan

(44)

ANNEXURE "D"

2008ء

بابت ماہ اکتوبر

رجسٹر حاضری مدرسین

فرزانہ بی	مرویسہ شامین	شبنم ادمل	افتخار بیگ
Lab ALL	Sweeper	Chowkidar	N.G

روز	آدم		انثی		آدم		انثی		روز
	دستخط	وقت	دستخط	وقت	دستخط	وقت	دستخط	وقت	
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									

Medical leave

Medical leave
 C/Leave
 12.10.08
 Medical leave
 13.10.08
 14.10.08
 15.10.08
 16.10.08
 17.10.08
 18.10.08
 19.10.08
 20.10.08
 21.10.08
 22.10.08
 23.10.08
 24.10.08
 25.10.08
 26.10.08
 27.10.08
 28.10.08
 29.10.08
 30.10.08
 31.10.08

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان
		01			01			01			01

ATTESTED

دستخط پرنسپل

45

ANNEXURE "E"



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL HARIPUR

Ph: No. 0995-351016, Fax No. 0995-351017

No. 480-483, Dated 19/01/2021

To:

The
Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

Handwritten signature and date: 19/1/21

SUBJECT: APPROVAL FOR CONSTITUTION OF MEDICAL BOARD

Sir,

Please find enclosed herewith the case in respect of Mrs Farzana Bibi Lab Attendant, BPS-03, Govt Girls High School Julian Haripur pertaining to following documents duly attested for provision of approval for constitution of medical board to proceed further in the matter:

- 1. Appointment order
- 2. Two pages of service book
- 3. Pay slip
- 4. CNIC copy
- 5. Medical record

MEDICAL SUPERINTENDENT
DHQ HOSPITAL, HARIPUR

Handwritten signature of the Medical Superintendent

The above is forwarded to the:
1. District Education Officer (Female), Haripur
2. District Councils (High School Julian Haripur)
3. Chairman Standing Medical Board, DHQ Hospital Haripur

Handwritten initials: DM-0

MEDICAL SUPERINTENDENT
DHQ HOSPITAL, HARIPUR

Handwritten signature

Handwritten signature and date: 19/1/21
ATTESTED



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 3116-20 M.Board/ Dated 20/05/2021

45-A

To

Mrs. Farzana Bibi
Lab attendant BPS-3,
GGHS Julian Haripur

**SUBJECT: CONSTITUTION OF STANDING MEDICAL BOARD IN RESPECT OF
MRS. FARZANA BIBI LAB ATTENDANT BPS-03, GGHS JULIAN.**

Memo:

With reference to the Director General Health Services, Khyber Pakhtunkhwa, Peshawar vide letter No. 2683-84/Medical/SMB dated 05/05/2021 on the subject cited above.

In this regard, you are hereby informed to appear before the Standing Medical Board which is going to be held on 21.05.2021 at 10:00 am, in the office of the undersigned for necessary Medical Examination along with CNIC and relevant medical record.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Cc:

1. District Education Officer (Female) Haripur.
2. Chairman, Standing Medical Board, DHQ Hospital Haripur
3. Members, standing medical board DHQ Hospital Haripur
4. Focal Person Standing Medical Board DHQ Hospital Haripur

F. A. Bibi
20/05/21
MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

R

45-B

428
08-05
2021



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name E-Mail Address K.P.Kdghs@yahoo.com
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

NO. 268384/Medical/SMB

Dated 5/5/2021

To,

The Medical Superintendent
DHQ Hospital, Haripur.

Subject: STANDING MEDICAL BOARD IN RESPECT OF Mrs. FARZANA BIBI, LAB ATTENDANT BPS-03, GGHS JULIAN HARIPUR.

Reference your letter No. 480-483 dated 19-01-2021 on the subject cited above.

You are therefore, requested to arrange her Standing Medical Board and proceeding of the Board may please be sent to the quarter concerned under intimation to this Directorate.

w/p Farooq
5/5/21

**ADDL: DIRECTOR GENERAL (ADMIN)
DIRECTORATE GENERAL HEALTH
SERVICES, KHYBER PAKHTUNKHWA,
PESHAWAR.**

20/5/2021

Copy forwarded to the District Education Officer (Female) Haripur, for information with the request to direct the above name officer/official to appear before the Medical Superintendent, DHQ Hospital, Haripur for medical examination to be carried by the Standing Medical Board / Standing Invalidating Committee on the Date & Time fixed by MS, DHQ Hospital, Haripur alongwith relevant documents & National Identity Card.

FP SMB

[Handwritten signature]

MS 1/10/21

کتابت ماہ لچ لیسٹ میں درج شدہ سرکار کے کولہاں

ANNEXURE "F"

جس کا

درج ذیل سرکار کے کولہاں میں لکھی گئی

اسٹڈنٹ اینڈ ایڈوائزرز ایسوسی ایشن

کے سرورس کے تحت لکھی گئی ہے

میں سے لکھی گئی ہے اور اس کے تحت

کے تحت لکھی گئی ہے اور اس کے تحت

کے تحت لکھی گئی ہے اور اس کے تحت

کے تحت لکھی گئی ہے اور اس کے تحت

کے تحت لکھی گئی ہے اور اس کے تحت

ATTESTED

49/9/2020

Forwarded to DEO
E & S Schools
Haripur

Principal
GGHS Joulian

Principal
GGHS Joulian

2020

خدمت جناب برائیس صاحبہ گورنمنٹ گریلز ہائی سکول جولیان

جناب عالیہ!

مورد باز گزارش حصہ سائلہ گورنمنٹ گریلز ہائی سکول جولیان میں بطور
لیب اینڈنٹ اپنے فرائض سرعام دے رہی ہوں
اور سروس تقریباً 25 سال ہو چکی ہے۔

میں میڈیکل یعنی جسمانی طور پر مرخص ہو چکی ہوں۔ سروس کو
مزید جاری رکھنے سے فائدہ نہیں۔ ریلورٹس میڈیکل درخواست کے
ساتھ لف ہے۔

میری فرمائش ہے کہ میں اکیس سروس میڈیکل گرانڈز پر DEO(F)
صاحبہ کو فارورڈ کیا جاوے تاکہ اس پر بہتر دانہ عود فرما کر
مخلص آمد کیا جاوے۔

العارضہ

فرزاد بی بی لیب اینڈنٹ گورنمنٹ ہائی سکول جولیان خان پور

CTC
ATTESTED

گورنمنٹ ہائی اسکول جیولیان
گورنمنٹ ہائی اسکول جیولیان

(48)

جن عالیہ

گورنمنٹ ہائی اسکول جیولیان
میں پورے اسکول کے طلبہ اور اساتذہ
اور اساتذہ کی طرف سے ایک وفد
جو اساتذہ اور طلبہ کے
میں سے منتخب ہو کر
گورنمنٹ ہائی اسکول جیولیان

میں سے منتخب ہو کر
گورنمنٹ ہائی اسکول جیولیان
میں سے منتخب ہو کر
گورنمنٹ ہائی اسکول جیولیان

الاعتراف عن وزير

سالہ خزانہ کی کاپی
گورنمنٹ ہائی اسکول جیولیان

15/11/11
20/11/11
No 660

Forwarded to
DEO(F) Hadipat
E P S
Hadipat

Principal
GGHS Joulian

ATTESTED

پری بورڈ

(49)

صنای عالیہ

گزارش مکملہ سائلہ فرڈانہ بی بی گورنمنٹ

گورنمنٹ پرائمری سکول جو لیاں میں بطور Lab / A+1 لکھا

کئی ڈیٹا ریکورڈ کی فریڈ ہے جسکی وجہ سے ڈیٹا اینٹ

فرالٹس کو اچھی طرح سے انجام نہیں دے سکتی ہیں

ایک وجہ سے اس نے فورم 2020-10-15 کو

صیڈیکل بورڈ سے Apply کر دیا تھا۔

پرنسپل گورنمنٹ پرائمری

سکول جو لیاں

Principal

07-07-2021

ATTESTED

National Bank of Pakistan

Account Statement

ANNEXURE - "G"

Account Title(s) FARZANA BIBI

Address: MOHALLA MELAD NAGAR PO BOX HR

Town:

District:

City: HARIPUR

Province/State: KH.PAKHTOON

Country: PAKISTAN

Product Name: PLS Savings Account

Currency: PKR

CIF No: 12887649

Account No: 3153761648

IBAN: PK22NBPA0582003153761648

Postal Code:

Branch Code/Name: 582 Khanpur Dam Branch

Region Name: Abbottabad

Statement Printing Date: 29-Nov-2021

User: 00019457

Branch: 582

Terminal: VDI-ABT

B/F Balance: 0.00

From: 01-Jan-2018

To: 28-Nov-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
1	08-Nov-2018	CASH DEPOSIT			0.00	500.00	500.00
2	31-Dec-2018	SALARY		31	0.00	20,379.00	20,879.00
3	31-Dec-2018	WITHDRL		31	6,835.79	0.00	14,043.21
4	02-Jan-2019	CHECK BOOK CHARGES		02	175.00	0.00	13,868.21
5	03-Jan-2019	CASH WITHDRAWAL	17350976		13,800.00	0.00	68.21
6	12-Jan-2019	GROSS PROFIT		01	0.00	8.42	76.63
7	12-Jan-2019	WithHolding Tax		01	0.84	0.00	75.79
8	16-Jan-2019	TRANSFER			0.00	40,000.00	40,075.79
9	18-Jan-2019	CASH WITHDRAWAL	17350977		40,000.00	0.00	75.79
10	28-Jan-2019	WITHDRL		28	75.79	0.00	0.00
11	31-Jan-2019	SALARY		31	0.00	18,379.00	18,379.00
12	31-Jan-2019	WITHDRL		31	7,446.78	0.00	10,932.22
13	18-Feb-2019	CASH WITHDRAWAL	17350978		5,000.00	0.00	5,932.22
14	25-Feb-2019	CASH WITHDRAWAL	17350979		5,500.00	0.00	432.22
15	28-Feb-2019	WITHDRL		28	432.22	0.00	0.00
16	28-Feb-2019	SALARY		28	0.00	18,379.00	18,379.00
17	28-Feb-2019	WITHDRL		28	7,090.59	0.00	11,288.41
18	05-Mar-2019	CASH WITHDRAWAL	17350980		11,000.00	0.00	288.41
19	28-Mar-2019	WITHDRL		28	288.41	0.00	0.00
20	29-Mar-2019	SALARY		29	0.00	18,379.00	18,379.00
21	29-Mar-2019	WITHDRL		29	7,234.59	0.00	11,144.41
22	02-Apr-2019	CASH WITHDRAWAL	17350981		11,000.00	0.00	144.41
23	29-Apr-2019	WITHDRL		29	144.41	0.00	0.00
24	30-Apr-2019	SALARY		30	0.00	18,379.00	18,379.00
25	30-Apr-2019	WITHDRL		30	7,378.45	0.00	11,000.55

This is a computer generated statement and does not require any signature

Page 1 of 5

etc
Waqar Naeem
ATTESTED

National Bank of Pakistan

Account Statement



Account Title(s) FARZANA BIBI

Address: MOHALLA MELAD NAGAR PO BOX HRP

Town:

District:

City:

Province/State:

Country:

Product Name: PLS Savings Account

Currency:

CIF No: 12887649

Account No: 3153761648

IBAN:

Postal Code:

Branch Code/Name: 582 Khanpur Dam Branch

Region Name: Abbottabad

Statement Printing Date: 29-Nov-2021

User: 00019457

Branch: 582

Terminal: VDI-ABT

B/F Balance: 0.00

From: 01-Jan-2018

To: 28-Nov-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
26	02-May-2019	CASH WITHDRAWAL	17350982		11,000.00	0.00	0.55
27	28-May-2019	SALARY		28	0.00	18,379.00	18,379.55
28	28-May-2019	CASH WITHDRAWAL	17350983		10,500.00	0.00	7,879.55
29	28-May-2019	WITHDRL		28	356.55	0.00	7,523.00
30	30-Jun-2019	SALARY		30	0.00	18,379.00	25,902.00
31	02-Jul-2019	CASH WITHDRAWAL	17350984		10,500.00	0.00	15,402.00
32	02-Jul-2019	WITHDRL		02	7,879.00	0.00	7,523.00
33	20-Jul-2019	GROSS PROFIT		01	0.00	184.60	7,707.60
34	20-Jul-2019	WithHolding Tax		01	27.69	0.00	7,679.91
35	20-Jul-2019	WITHDRL		20	156.91	0.00	7,523.00
36	29-Jul-2019	WITHDRL		29	7,523.00	0.00	0.00
37	31-Jul-2019	SALARY		31	0.00	19,691.00	19,691.00
38	31-Jul-2019	WITHDRL		31	6,653.51	0.00	13,037.49
39	01-Aug-2019	CASH WITHDRAWAL	17350986		13,000.00	0.00	37.49
40	28-Aug-2019	WITHDRL		28	37.49	0.00	0.00
41	31-Aug-2019	SALARY		31	0.00	19,691.00	19,691.00
42	31-Aug-2019	WITHDRL		31	7,485.05	0.00	12,205.95
43	02-Sep-2019	CASH WITHDRAWAL	17350987		12,000.00	0.00	205.95
44	28-Sep-2019	WITHDRL		28	205.95	0.00	0.00
45	30-Sep-2019	SALARY		30	0.00	19,691.00	19,691.00
46	30-Sep-2019	WITHDRL		30	7,317.05	0.00	12,373.95
47	01-Oct-2019	CASH WITHDRAWAL	17350988		12,000.00	0.00	373.95
48	28-Oct-2019	WITHDRL		28	373.95	0.00	0.00
49	31-Oct-2019	SALARY		31	0.00	19,691.00	19,691.00
50	31-Oct-2019	WITHDRL		31	7,149.40	0.00	12,541.60

This is a computer generated statement and does not require any signature

Page 2 of 5

etc
Waqar Nadeem
ATTESTED

National Bank of Pakistan



Account Statement

Account Title(s) FARZANA BIBI

Address: MOHALLA MELAD NAGAR PO BOX HRP

Town:

District:

City:

Province/State:

Country:

Postal Code:

Product Name: PLS Savings Account

Currency:

CIF No: 12887649

Account No: 3153761648

IBAN:

Branch Code/Name: 582 Khanpur Dam Branch

Region Name: Abbottabad

Statement Printing Date: 29-Nov-2021

User: 00019457

Branch: 582

Terminal: VDI-ABT

B/F Balance: 0.00

From: 01-Jan-2018

To: 28-Nov-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
51	01-Nov-2019	CASH WITHDRAWAL	17350989		12,000.00	0.00	541.60
52	28-Nov-2019	WITHDRL		28	541.60	0.00	0.00
53	29-Nov-2019	SALARY		29	0.00	19,691.00	19,691.00
54	29-Nov-2019	WITHDRL		29	6,981.28	0.00	12,709.72
55	02-Dec-2019	CASH WITHDRAWAL	17350990		12,500.00	0.00	209.72
56	28-Dec-2019	WITHDRL		28	209.72	0.00	0.00
57	31-Dec-2019	SALARY		31	0.00	20,198.00	20,198.00
58	31-Dec-2019	WITHDRL		31	7,313.00	0.00	12,885.00
59	02-Jan-2020	CASH WITHDRAWAL	17350991		12,500.00	0.00	385.00
60	11-Jan-2020	GROSS PROFIT		01	0.00	111.00	496.00
61	11-Jan-2020	WithHolding Tax		01	22.20	0.00	473.80
62	28-Jan-2020	WITHDRL		28	473.80	0.00	0.00
63	28-Jan-2020	SALARY		28	0.00	20,198.00	20,198.00
64	28-Jan-2020	WITHDRL		28	7,049.17	0.00	13,148.83
65	30-Jan-2020	CASH WITHDRAWAL	17350992		13,000.00	0.00	148.83
66	28-Feb-2020	WITHDRL		28	148.83	0.00	0.00
67	28-Feb-2020	SALARY		28	0.00	20,198.00	20,198.00
68	28-Feb-2020	WITHDRL		28	7,374.50	0.00	12,823.50
69	03-Mar-2020	CASH WITHDRAWAL	17350993		12,800.00	0.00	23.50
70	26-Mar-2020	SALARY		26	0.00	20,198.00	20,221.50
71	30-Mar-2020	WITHDRL		30	7,522.68	0.00	12,698.82
72	31-Mar-2020	CASH WITHDRAWAL	17350994		12,500.00	0.00	198.82
73	28-Apr-2020	WITHDRL		28	198.82	0.00	0.00
74	28-Apr-2020	SALARY		28	0.00	20,198.00	20,198.00
75	28-Apr-2020	WITHDRL		28	7,323.82	0.00	12,874.18

This is a computer generated statement and does not require any signature

Page 3 of 5

etc
Waqar Naqvi
ATTESTED

National Bank of Pakistan

Account Statement



Account Title(s) FARZANA BIBI

Address: MOHALLA MELAD NAGAR PO BOX HRP

Postal Code:

Branch Code/Name: 582 Khanpur Dam Branch

Region Name: Abbottabad

Statement Printing Date: 29-Nov-2021

User: 00019457

Branch: 582

Terminal: VDI-ABT

Town:

District:

City:

Province/State:

Country:

Product Name: PLS Savings Account

Currency:

CIF No: 12887649

Account No: 3153761648

IBAN:

B/F Balance: 0.00

From: 01-Jan-2018

To: 28-Nov-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
76	30-Apr-2020	CASH WITHDRAWAL	17350995		12,500.00	0.00	374.18
77	19-May-2020	SALARY		19	0.00	20,198.00	20,572.18
78	20-May-2020	CASH WITHDRAWAL	17350996		13,000.00	0.00	7,572.18
79	28-May-2020	WITHDRL		28	7,523.09	0.00	49.09
80	29-Jun-2020	WITHDRL		29	49.09	0.00	0.00
81	30-Jun-2020	SALARY		30	0.00	20,198.00	20,198.00
82	30-Jun-2020	WITHDRL		30	7,473.92	0.00	12,724.08
83	02-Jul-2020	CASH WITHDRAWAL	17350997		12,500.00	0.00	224.08
84	11-Jul-2020	GROSS PROFIT		01	0.00	90.67	314.75
85	11-Jul-2020	WithHolding Tax		01	27.20	0.00	287.55
86	27-Jul-2020	SALARY		27	0.00	20,198.00	20,485.55
87	28-Jul-2020	WITHDRL		28	7,523.25	0.00	12,962.30
88	29-Jul-2020	CASH WITHDRAWAL	17350998		12,900.00	0.00	62.30
89	28-Aug-2020	WITHDRL		28	62.30	0.00	0.00
90	31-Aug-2020	SALARY		31	0.00	20,198.00	20,198.00
91	31-Aug-2020	WITHDRL		31	7,460.70	0.00	12,737.30
92	07-Sep-2020	CASH WITHDRAWAL	17350999		12,500.00	0.00	237.30
93	28-Sep-2020	WITHDRL		28	237.30	0.00	0.00
94	30-Sep-2020	SALARY		30	0.00	22,349.00	22,349.00
95	30-Sep-2020	WITHDRL		30	7,285.66	0.00	15,063.34
96	02-Oct-2020	CASH WITHDRAWAL	17351000		15,000.00	0.00	63.34
97	28-Oct-2020	WITHDRL		28	63.34	0.00	0.00
98	29-Oct-2020	SALARY		29	0.00	22,349.00	22,349.00
99	29-Oct-2020	WITHDRL		29	7,459.20	0.00	14,889.80
100	02-Nov-2020	CHECK BOOK CHARGES		02	175.00	0.00	14,714.80

This is a computer generated statement and does not require any signature

Page 4 of 5

Waqar Noor

ATTESTED

National Bank of Pakistan

Account Statement

(54)

Account Title(s) FARZANA BIBI

Address: MOHALLA MELAD NAGAR PO BOX HRP

Town:

District:

City:

Province/State:

Country:

Product Name: PLS Savings Account

Currency:

CIF No: 12887649

Account No: 3153761648

IBAN:

Postal Code:

Branch Code/Name: 582 Khanpur Dam Branch

Region Name: Abbottabad

Statement Printing Date: 29-Nov-2021

User: 00019457

Branch: 582

Terminal: VDI-ABT

B/F Balance: 0.00

From: 01-Jan-2018

To: 28-Nov-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
101	02-Nov-2020	CASH WITHDRAWAL	3268001		14,500.00	0.00	214.80
102	07-Nov-2020	DEPOSIT		gp fund	0.00	64,000.00	64,214.80
103	11-Nov-2020	CASH WITHDRAWAL	3268002		50,000.00	0.00	14,214.80
104	12-Nov-2020	CASH WITHDRAWAL	3268003		4,000.00	0.00	10,214.80
105	28-Nov-2020	WITHDRL		28	7,522.61	0.00	2,692.19
106	30-Nov-2020	SALARY		30	0.00	20,349.00	23,041.19
107	01-Dec-2020	CASH WITHDRAWAL	3268004		15,000.00	0.00	8,041.19
108	28-Dec-2020	WITHDRL		28	7,523.22	0.00	517.97
109	23-Jan-2021	GROSS PROFIT		01	0.00	138.86	656.83
110	23-Jan-2021	WithHolding Tax		01	41.66	0.00	615.17
111	28-Jan-2021	WITHDRL		28	615.17	0.00	0.00
112	17-Jul-2021	GROSS PROFIT		01	0.00	2.50	2.50
113	17-Jul-2021	WithHolding Tax		01	0.75	0.00	1.75
114	17-Jul-2021	WITHDRL		17	1.75	0.00	0.00
115	19-Jul-2021	CASH DEPOSIT			0.00	7,500.00	7,500.00
116	19-Jul-2021	WITHDRL		19	7,500.00	0.00	0.00
117	20-Sep-2021	CASH DEPOSIT			0.00	5,000.00	5,000.00
118	20-Sep-2021	WITHDRL		20	5,000.00	0.00	0.00

Total 35 Credit transactions of amount: 593,473.05

Total 83 Debit transactions of amount: 593,473.05

This is a computer generated statement and does not require any signature

Page 5 of 5

c/c
Wajid Ali
ATTESTED



(SS)

ANNEXURE -H

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR

Phone No. 0995-920154, Fax No. 0995-920155

No: 3917 / Dated 13/07/2021

NOTIFICATION

1. Whereas, Mst: Farzana Bibi Lab Attendant GGHS Julian District Haripur Was proceeded under the Khyber Pakhtun Khawa Govt: Servant (efficiency and Discipline) rules 2011, on the charge mentioned in the charge sheet.
2. And whereas, Show cause/absent notice was issued to Mst: Farzana Bibi, Lab Attendant GGHS Julian Haripur vide this office No, 80551 Dated 22-1-2021.
3. And whereas Mst: Farzana Bibi Lab Attendant GGHS Julian District Haripur was issued Charge sheet and Mst: Robeena Rasheed Principal GGHS No. 2 Haripur and Mst: Beenish Aftab Headmistress GGMS Sikander Pur Haripur were appointed as inquiry officers vide this office notification No 2619 dated 05-06-2021
4. And whereas, The inquiry officers after having examined the charges evidence on the record including her personal defense submitted their report vide letter No 2351 Dated 09-06-2021.
5. And whereas Mst: Farzana Bibi Lab Attendant GGHS Julian Haripur was called for personal hearing on 05-06-2021 but she did not appear.
6. And whereas, The authority having considered the charges, evidence on the record as per report of inquiry officers, Principal GGHS Julian and given the opportunity of personal hearing / appearing in person to the accused Lab: Attendant, is of the view that the charges leveled against her have been proved.
7. And whereas, A show cause Notice has been published in leading News paper vide No. 3131 dated 21.06.2021 in which she has to join her duty with in 10 days but she again failed to join her duty./absent
8. Now, therefore in exercise of the powers conferred by the Khyber Pakhtun Khawa Govt: Servants (Efficiency and discipline) Rule 2011, rule 4(b(ii)), the competent authority is pleased to imposed the Major Penalty of Removal from service upon Mst: Farzana Bibi Lab Attendant GGHS Julian.

Endst: No 3917-20

Samina Altaf
Samina Altaf
District Education officer,
Female Haripur.
Dated 13/07/2021

Copy forwarded for information and necessary action to the:-

1. Director E & S Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Haripur
3. District Account officer Haripur.
4. District Monitoring officer Haripur.
5. Principal GGHS Julian Haripur.
6. Mst: Farzana Bibi Ex-Lab Attendant GGHS Julian
7. ADEO Estab: Secondary Local Office.
8. Master File.

CTC
W-4M-7K
ATTESTED

Samina Altaf
Samina Altaf
District Education officer,
Female Haripur.

To

(8)

ANNEXURE - I

The Director Elementary
And Secondary Education
Khyber Pakhtunkhwa Peshawar

Subject. DEPARTMENTAL APPEAL AGAINST THE "REMOVAL
FROM SERVICE" ORDER OF THE DEO (FEMALE)
HARIPUR, ENDORSEMENT NO. 1717 DATED 17/07/2021.

Respected Sir,

1. The reference is made to the removal from service order dated 17/07/2021 by the office of DEO (Female) Haripur (Copy is annexed as Annexure "A")
2. That the appellant got appointed as Laboratory Attendant BPS
3. Through endorsement No 6953-57 dated 20/02/2010 (Copy of appointment letter is annexed as Annexure "B")
3. That the salary of the appellant has been stopped the month December 2020 without any prior notice of information sine.
4. That the appellant through out the service i.e 10 years, 9 months, 12 days has served the department with utmost passion and has been drawing the salary as per the pay scale (Copy of monthly salary and relevant page of service book is attached as Annexure "C").
5. That, the appellant, unfortunately got diabetic, due to which serious health issues, like cardiac pains and sciatic pains. The condition of the appellant got worse with the passage of time, where upon she was time and again referred for bed rest by the physicians (Copy of medical slips are attached as Annexure "D").

ATTESTED

6. That, in the month of October 2020 due to illness the appellant was unable to attend the school and was unable to perform her duties, therefore, she applied for medical leave as recommended by the doctors. (Copy of attendance register is annexed as Annexure "E").
7. That on the advice of doctors and the ailing health conditions, the appellant applied for the formation of Medical Board in the month of Jan 2021 as per law and policy which was admitted for proceedings and is yet to be decided. (Copies of Medical Board letters are attached as Annexure "J").
8. That, meanwhile the appellant on different occasions had visited the place of job, where upon she was informed that as her medical leave is accepted and the formation of medical board is under process, therefore, the appellant was told not to come to the school by the principal of the school. (G)
9. That, the appellant had attended the medical board firstly in Haripur District which was later referred to heart surgeon medical board Abbottabad, where doctor in Abbottabad asked for a letter from the DEO (Female) Haripur but she has refused till date.
10. That three days ago when the appellant last went to the office of the DEO (Female) Haripur, to inquire about the reply, where the appellant was informed by the DEO concerned that the appellant has been removed from the service already and the removal letter was pending with the concerned principal of the school.

ATTESTED

(88)

- 11. That, upon receiving the removal letter news the appellant rushed to the office of the principal Govt. Girls Higher Secondary School Julian Abbottabad and received a removal letter on whatsapp of the said principal, hence this appeal.
- 12. That, the removal from the service order of the respondent/DEO (Female) Haripur is illegal, perverse without any notice, against the law, and based on malafide therefore the same is liable to be set aside.

In view of the above discussed facts, it is humbly prayed that the impugned order dated 17/07/2021 may be set aside, with direction to the respondent to reply to the letter of the medical board, and the appellant may be reinstated in service with all back benefits and the salary of the appellant be reinstated.

Dated: 16/08/2021

...APPELLANT
 Farzana Bibi
 D/o Muhammad Aslam
 Laboratory Attendant
 GGHS, Julian District Haripur
 Khyber Pakhtunkhwa

Copy to:-

DEO (Female) Haripur, KPK

ph#

0315 1500035
 0316 0881234

ATTESTED

وکالت نامہ

بعدالت جناب سروس ٹریبونل ایسٹ

کمرٹری ایلنڈی و غیرہ

عنوان: فرزانہ 1313 بنام

منجانب: سٹیشنر

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب وہی کل کاروائی متعلقہ آن مقام

تہہ حاصل لعدی لعدی ایڈووکیٹ کورٹ

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختمہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد

استجارت ناش بضمینہ مفلسی کے دائرہ کرنے اور اس کے پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

Attested

الرقوم:

13/12/2021

Syed Waqas Naqvi
Advocate High Court
Office 28, Ayub Faisal Lawyers
Egan, Kutchery, Abbottabad

بمقام:

"A"

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

TB

No.

APPEAL No. 7867 of 2021.

Farzana Bibi

Appellant/Petitioner

Versus

Syed Edna M. P. Pesh

RESPONDENT(S)

Counsel
Notice to Appellant/Petitioner

Syed Waqas Nagwi
Advocate High Court
Alekhailad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 18-2-2022 at 9:00 AM

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

at Camp Court Peshawar

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

"A"

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

No. 713

APPEAL No. 7867 of 20 21.

Farzana Bibi

Appellant/Petitioner

Versus

Soy: Edu: i/c Pt Pesh:

RESPONDENT(S)

Wahecc

Notice to Appellant/Petitioner

Farzana Bibi w/o Abdul

R/o Mahallah Meclad Nagav

R/o Khanpur Tehsil Khanpur Distt.
Haripur

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 18-2-2022 at 9:00 AM

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

at Camp Court P. Abad

M. Nadeem
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. *7867* of 20 *21*

Farzana Bibi

Appellant/Petitioner

Versus

Sery: (CBSE) Peshawar

RESPONDENT(S)

RESP NO 3
Notice to ~~Appellant/Petitioner~~ *DIST Education officer*
(Female) Hazipur

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *23-9-22* at *9:00 AM*

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

at Camp Court
Alabad

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

TB A/Abad.

No.

APPEAL No. 7867 of 20 21

Farzana Bibi

Appellant/Petitioner

Versus

Imgha Sey: (E&SE) Pesh

RESPONDENT(S)

Resp No 2

Director (E&SE)
Peshawar

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 23/7/22 at 11:00 AM

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

at Camp Court

A/Abad.

[Signature]
9/9/22

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

TRB

No.

7867

21

APPEAL No..... of 20

Farzana Bibi

Appellant/Petitioner

Versus

Secy Education Peshawar

RESPONDENT(S)

Resp: No


Secretary Education
(E&SE) Peshawar

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 23-7-22 at 9.30 AM

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

at camp court
At Akad.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.