

10<sup>th</sup> Oct, 2022

Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment to prepare the case. To come up for preliminary hearing on 28.11.2022 before S.B.





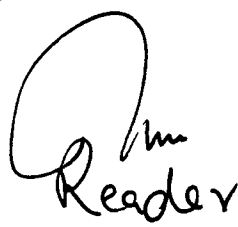
(Kalim Arshad Khan)  
Chairman

Form- A

# FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 946/2022 \_\_\_\_\_


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 23/06/2022                | <p>The appeal of Mr. Hamza Ali Khan resubmitted today by Mr. Yasir Saleem 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;"><br/>REGISTRAR,</p>    |
| 2-    | 13-7-22                   | <p>This case is entrusted to touring Single Bench at D.I.Khan for preliminary hearing to be put there on <u>25-7-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"><br/>CHAIRMAN</p> |
|       | 25.07.2022                | <p>Tour to D.I.Khan has been cancelled due to summer vacation, Therefore, the case is adjourned for the same on 26.9.2022.</p> <p style="text-align: right;"><br/>Reader</p>  |

The appeal of Mr. Hamza Ali Khan Ex-Wader Attached to Central Prison D.I.Khan received today i.e. on 15.06.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


- ① Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 2- Annexures-C&E of the appeal are illegible which may be replaced by legible/better one.

No. 2031/S.T,

Dt. 16/6 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Yasir Saleem Adv. Pesh.

*R/S in  
the departmental appeal is  
not available, hence the  
rejection order has already been  
attached at P. No 28. of the appeal.  
Resubmitted.  
By *

Ms

will to eliminate the corruption in the country and against (MS) Faiza Shafi, Ex-DEO as she demanded Rs. 20000/- from him for the post of Driver in his report to Anti-corruption. His said claim does not stand valid as:

I. He could not apply for the post till 15.03.2017, when advertised on 24.02.2017.

II. He already accepted that he could not apply for new Driver posts with in due time as per his statement to (MS) Riaz, DEO(F) Torgher during inquiry, Mr

III. He considered himself as senior and most suitable, whereas he was not the competent to decide about it.

IV. He accepted his act of bribery, which is itself a crime.

V. His allegation upon Ms. Faiza, Ex-DEO(F) could not be established as he himself not handed over the Tainted money as per plan. Likewise the raid party under the supervision of a judge could not prove, except that envelope containing Rs. 20000/- from the corner of a table of Ms. Faiza, Ex-DEO on spot on 03.05.2017 as the TAINTED MONEY WAS NOT HANDED OVER TO HER IN OPEN FORM, RATHER PLANTED IN ENVELOPE AND FOUND ON HER TABLE CORDER. N

VI. His allegation has also been proved false as Anti-Corruption Department, Khyber Pakhtunkhwa has dropped the case registered under FIR #: 02 dated 03.05.2017 and ordered to register case under section 182 Cr.Pc and 112 PPC vide Letter No. 8595 dated 23.05.2017. He has although, challenged it through writ #: 1077/2017 in the Honourable PHC Abbottabad Bench and got relief as the impugned proceedings U/S 182 Cr. Pc & 112 PPC stands suspended on 11.11.2017.

VII. He skillfully plotted to utilize the service of Shabbana Kauser, by handing over her envelope containing 20000/- as per her statement under 164 before Anti-Corruption Judge on 06.05.2017. Her earlier statement in favour of Shah Nawaz addressed to DC Abbottabad on 03.05.2017 was of no value,

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

CM No: 429/2022 in  
Service Appeal No. 946/2022

Khyber Pakhtunkhwa  
Service Tribunal  
Entry No. 846  
Dated 28/07/2022

Hamza Ali Khan .....Petitioner

VERSUS

Govt of KPK & others .....Respondents

APPLICATION FOR HEARING OF THE  
INSTANT APPEAL AT THE PRINCIPLE  
SEAT AT PESHAWAR.

*Be  
a Misc  
Application  
one after  
noticed  
that  
15/07/2022*

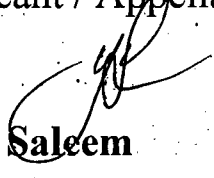
*[Signature]*

**Respectfully Sheweth:**

1. That the instant appeal is pending before this Hon'ble Tribunal which has been transferred for hearing before Khyber Pakhtunkhwa Service Tribunal at D.I Khan Bench vide order dated 26-9-2022
2. That the appellant belongs to Lakki Marwat and it is almost near to impossible for him to go to D.I Khan for each and every date of hearing or to engage a counsel at D.I Khan.
3. That all the record can be requisitioned from respondent department and the appeal can be conveniently decided here at Peshawar.

4. That it would be in the best interest of justice that the instant appeal be heard at Principle Seat of Service Tribunal, Peshawar.
5. That there is no legal impediment of fixation of the instant appeal and its hearing at Khyber Pakhtunkhwa Service Tribunal at Peshawar.

*It is, therefore, most humbly prayed that on acceptance of this application, the instant appeal may kindly be fixed and heard at the Principle Seat of Khyber Pakhtunkhwa Service Tribunal, Peshawar.*

Through Applicant / Appellant  
  
Yasir Saleem  
Advocate,  
High Court Peshawar

Date: 28-Jul-22

BEFORE THE KHYBER PUKHTUNKHWA SERVICES  
TRIBUNAL, PESHAWAR

Service Appeal No. 946 /2022

**Hamza Ali Khan** S/o Taj Ali  
Ex-Warder attached to Central Prison D.I Khan

.....APPELLANT

V/S


1. Inspector General of Prison, Khyber Pakhtunkhwa Peshawar.
2. Superintendent Headquarter Prison, D.I Khan.
3. Superintendent Central Prison, D.I Khan.


.....RESPONDENTS

I N D E X

| S.No | Description of Documents                           | Annex | Pages |
|------|--|-------|-------|
| 1.   | Service Appeal alongwith affidavit                 |       | 1-4   |
| 2.   | Copy of relieving order dated 30.09.2014           | A     | 5     |
| 3.   | Copy of order dated 06.02.2015                     | B     | 6     |
| 4.   | Copy of office order dated 31.03.2015              | C     | 7     |
| 5.   | Copies of death certificate, medical prescriptions | D     | 8-27  |
| 6.   | Copy of order dated 21.09.2021                     | E     | 28    |
| 7.   | Copy of rejected order dated 01.12.2021            | F     | 29    |
| 8.   | Wakalatnama  |       | 30    |

Through:

  
Appellant

  
**Yasir Saleem**  
Advocate High Court,  
Peshawar

①

BEFORE THE KHYBER PUKHTUNKHWA SERVICES  
TRIBUNAL, PESHAWAR

Service Appeal No. \_\_\_\_\_/2022

**Hamza Ali Khan S/o Taj Ali**

Ex-Warder attached to Central Prison D.I Khan

.....APPELLANT

V/S

1. Inspector General of Prison, Khyber Pakhtunkhwa Peshawar.
2. Superintendent Headquarter Prison, D.I Khan.
3. Superintendent Central Prison, D.I Khan.

.....RESPONDENTS

SERVICE APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974,  
AGAINST THE OFFICE ORDER DATED 21.09.2021,  
WHEREBY THE APPELLANT HAS BEEN AWARDED TO  
MAJOR PENALTY OF REMOVAL FROM SERVICE  
AGAINST WHICH HIS DEPARTMENTAL APPEAL  
DATED 13.10.2021 WAS ALSO REJECTED VIDE ORDER  
DATED 01.12.2021 COMMUNICATED TO THE  
APPELLANT ON 16.05.2022.

**PRAYER:**

On acceptance of this appeal the impugned order dated 21.09.2021 and appellate order dated 01.12.2021 may please be set aside and the appellant may kindly be reinstated into service with all back benefits.

Respectfully Sheweth.

**FACTS:**

1. That the appellant was initially appointed as Ex-Warder vide its office order in the year of 2013 after having qualified the test and also undergone the physical test and was successful in physical test also.
2. That after appointment the appellant took charge of his post and started performing his duties.



3. That while performing his duties in the said capacity, the appellant was transfer to Central Jail Bannu vide order dated 22.09.2014. Upon transfer the appellant was relieved vide order dated 30.09.2014. *(Copy of relieving order dated 30.09.2014 is attached as annexure A).*
4. That lateron the order dated 22.09.2014 was recalled and the appellant was ordered to remain at District Jail Lakki Marwat vide office order dated 06.02.2015. *(Copy of order dated 06.02.2015 is attached as annexure B).*
5. That again the appellant was transferred from District Jail Lakki Marwat to District Jail Karak vide office order dated 31.03.2015. *(Copy of office order dated 31.03.2015 is attached as annexure C).*
6. That in compliance of relieving order dated 30.09.2014 the appellant went to District Jail Bannu for joining his duties, however, he was not allowed to perform his duties in the meantime when the order dated 22.09.2014 was recalled, the appellant time and again reported for duty at District Jail Lakki Marwat, however there too the appellant was not allowed to join his duties.
7. That on one side the appellant was not allowed to join duties nor his leave application were entertained by the concern authority and on the other hand father of the appellant fell ill and he had to take care of his ailing father. The appellant applied for extra ordinary leave which he was verbally assured to be sanctioned. For medical treatment the appellant took his father to Karachi for few months and thereafter his father remained under treatment at his home district where he later-on died on 07.07.2020. *(Copies of death certificate, medical prescriptions are attached as annexure D).*
8. That after the death of the father the appellant time and again approached the respondents and submitted his arrival report and also requested for joining duties, however on each occasion he was asked to wait on the ground that due to corona offices are not properly working and thereby the appellant was kept in waiting.
9. That thereafter without conducting any fact finding or regular inquiry and without issuance of charge sheet or show cause notice the appellant was awarded the major penalty of removal

3

from service vide order dated 21.09.2021. It is worth to mention here that the absence period has been treated as Extra Ordinary Leave without pay. *(Copy of order dated 21.09.2021 is attached as annexure E).*

10. That feeling aggrieved from the impugned order dated 21.09.2021, the appellant filed departmental appeal, however, the same was also rejected vide order dated 01.12.2021. Copy of the appellant order was not provided initially to the appellant for which he times and again requested and lastly the same was communicated to the appellant on 16.05.2022. *(Copy of rejected order dated 01.12.2021 is attached as annexure F).*

11. That the impugned order dated 21.09.2021 and appellate order dated 01.12.2021 are illegal, against the facts and liable to be set aside inter alia on the following grounds.

#### GROUND OF SERVICE APPEAL

- A. That the appellant has not been treated in accordance with law hence his rights secured and guaranteed under the law and constitution is badly violated.
- B. That no proper procedure has been followed before the major penalty dated 21.09.2021, no charge sheet has been issued to the appellant nor any regular inquiry has been conducted.
- C. That the appellant was not allowed to join his duties after his transfer and in a meantime, since father of the applicant fell ill and due to his medical treatment the appellant applied for EOL and took his father to Karachi for medical treatment.
- D. That it is a constituent view of superior courts no major penalty can be awarded in the absence of any regular departmental inquiry so the major penalty imposed is against the facts and liable to be set aside.
- E. That the appellant have never committed any act or omission which could be termed as misconduct, albeit he was awarded major penalty of removal from service.

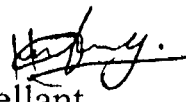
(4)

F. That the appellant is young and energetic and wants to service for his department albeit he has been awarded the major penalty. It is also pertinent to mention here that the appellant belongs to a poor family and the only earning hand of his family and due to the penalty he is exposed to financial problems.

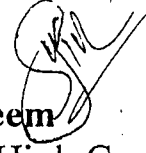
G. That the appellant seek permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that on acceptance of this appeal the impugned order dated 21.09.2021 and appellate order dated 01.12.2021 may please be set aside and the appellant may kindly be reinstated into service with all back benefits.

Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant.

  
Appellant

Through:

  
Yasir Saleem  
Advocate High Court,  
Peshawar

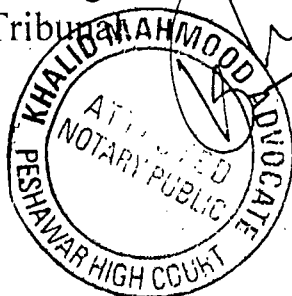
**Certificate:-**

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

  
ADVOCATE.

**AFFIDAVIT**

I, Hamza Ali Khan S/o Taj Ali Ex-Warder attached to Central Prison D.I Khan , do hereby solemnly affirm and declare on oath that contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



  
DEPONENT

(5)

Annex "A"

OFFICE OF THE  
SUPERINTENDENT

DISTRICT JAIL LAKKI MARWAT

Phone & Fax No: 0969-510547

Districtjaillakkiarwat@gmail.com

NO: 1527

Dated: 30-09-2014

To;

Warder *Hamza Ali*  
Attached to District Jail Lakki Marwat.

Subject:- RELIEVING DOCKET.

Memo:

Under instructions contained in the Superintendent Headquarter Jail D.I.Khan order No *10836-39* Dated *22-09-2014*, you are hereby relieved of your duties at this jail today on *30-09-2014* AN/EN and directed to report *to me* at the Superintendent *Central Jail Bannu* for further duty there.

You are allowed *nil* days joining time.

*[Signature]*  
SUPERINTENDENT  
DISTRICT JAIL LAKKI MARWAT

Endst: No. \_\_\_\_\_ Dated: \_\_\_\_\_ - 09-2014

Copy of the above is forwarded to:-

1. The Superintendent Central Headquarter Prison, D.I.K for information please.
2. The Superintendent *Central Jail Bannu* for information please.
3. The District Account Officer Lakki Marwat for information please.

*[Signature]*  
**ATTESTED**

SUPERINTENDENT  
DISTRICT JAIL LAKKI MARWAT



KPKP

OFFICE ORDER

6

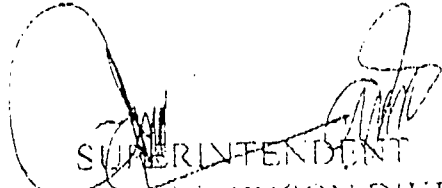
OFFICE OF THE  
SUPERINTENDENT  
CIRCLE H/Qs PRISON DIKHAN  
No. 853 /HQ Dt: 6/2/15  
PH&FAX NO. 0966-9250299  
Centraljail\_dikhan@yahoo.com

Annex "B"

Following Transfer / Postings Order are hereby made in the public interest.

1. Order regarding of Warder (BPS-05) Hamza Ali S/o Noor Taj Ali attached to District Jail Lakki Marwat issued vide this headquarter No. 10835 dated 22.09.2014 is hereby cancelled and remained attached to District Jail Lakki Marwat against vice No.2.
2. Warder (BPS-05) Khalil-ur-Rehman attached to District Jail Lakki Marwat is hereby transferred posted to Central Prison Bannu against vice No.1

Official should immediately be relieved with the direction to report for further duties in jail concerned with No joining time.

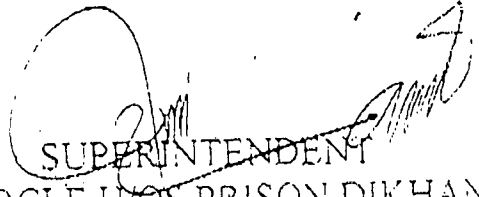
  
SUPERINTENDENT  
CIRCLE H/Qs PRISON DIKHAN

ENDST NO. 854-55 DATED 6 / 2 / 2015.

Copy of the above is forwarded to the:-

1. Superintendent Central Prison Bannu.
2. Superintendent District Jail Lakki Marwat.

For information and necessary action.

  
SUPERINTENDENT  
CIRCLE H/Qs PRISON DIKHAN

  
**ATTESTED**

31 Mar 2015 12:42PM P1



SUPERINTENDENT  
CIRCLE H/QS PRISON DIKCHAN  
No. 100/118  
PH&FAX NO. 0966-9280299  
Centraljaildikhan@yahoo.com

OFFICE ORDER

- Following Transfer / Postings Order are hereby made in the public interest:
1. Warden (BPS-05) Hamza Ali S/o Noor Taj Ali attached to District Jail Lakki Marwat against vice No. 1. ~~attached to District Jail Karak against vice No. 2.~~
  2. Warden (BPS-05) Shahid Rehman attached to District Jail Karak is hereby transferred and posted at District Jail Lakki Marwat against vice No. 1.

Officials should immediately be relieved with the direction to report for further duties in jail concerned with no joining time.

*[Signature]*  
SUPERINTENDENT  
CIRCLE H/QS PRISON DIKCHAN

~~INITIALS~~

Copy of the above is forwarded to the  
Superintendent District Jail Lakki Marwat.  
Superintendent District Jail Karak.

For information and necessary action.

*[Signature]*  
SUPERINTENDENT  
CIRCLE H/QS PRISON DIKCHAN

*[Signature]*  
**ATTESTED**

Superintendent  
Circle H/Q1 Prison D.I Khan  
No. /HQ  
PH&FAX No.0966-9280299  
[Centraljail.dikhan@yahoo.com](mailto:Centraljail.dikhan@yahoo.com)

**OFFICE ORDER**

Following Transfer / Postings Order are hereby made in the public interest.

1. Warden (BPS-05) Hamza Ali S/o Noor taj Ali attached to District Jail (sic)
2. Warden (BPS-09) Shahid Rehman attached to district Jail Karak is hereby transferred and posted at District Jail Lakki Marwat against Vice No. 01.

Officials should immediately be relieved with the direction to report for further duties in jail concerned with no joining time.

Sd/-  
Superintendent  
Circle H/Qs Prison DI Khan

Copy of the above is forwarded to the:

1. Superintendent District Jail Lakki Marwat
2. Superintendent District Jail Karak

For information and necessary action.

Sd/-  
Superintendent  
Circle H/Qs Prison DI Khan

Death Registration Certificate

Form No. W113504

king id: 50039610015685

AS No: 0500396-20-10284

TM REG

Deceased Person's Details

متوفی کے کوائف

Name: NOOR TALALI KHAN

Nationality: Pakistani

ID No: 14202-1314153-3

Date of Birth: 18-December-1959

Sex: Male

Religion: ISLAM

Age Period: 10 Days 5 Months 02 Years

Date of Death: 07-July-2020

Date of Burial/Last rite: 08-July-2020

Place of Death: KABIR KALLA

Cause of Death: Natural

Nature of Death: Normal

Place of Burial/Last rite at: DAWLATI NEKAH KABIR KALLA

Parental Information

والدین کے کوائف

Father's Name: GUL KHAN

Occupation:

Mother's Name: BIBI KHWAJA

Address

پتہ

Village KABIR KILLA (SABIR ABAD),

KARAK

KARAK

Applicant's Details

درخواست دہندہ کے کوائف

Name: DILSHAD BEGUM

ID No: 14202-7304779-2

Relationship with Deceased: WIFE

Information of Burial/Last rite by

تدفین یا آخری رسومات کنندہ کے کوائف

Name: SAQIB ALI KHAN

ID No: 14202-5822992-1

Relationship with Deceased: SON

Date: 10 August 2020

Date: 20 August 2020

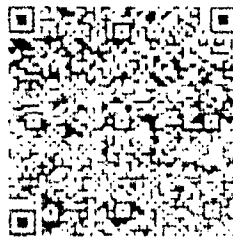
Status: Normal

Additional Information:

سرکاری نوٹس

سازگار

Record can be verified at <https://crms.nadra.gov.pk/verify>



W11350493

ATTESTED



Dr. Khalid Usman

(9)

M.B.B.S (Pesh) MRCP (Ireland) MRCP (Glasgow UK)

Consultant Endocrinologist

Endocrinology / Diabetes Mellitus / Metabolic Diseases

Post Graduate Medical Institute Hayatabad Medical Complex, Peshawar.

CLINIC: Habib Medical Complex, Opposite Mission Hospital

Dabgarl Garden Peshawar. 091-2562745

ڈاکٹر خالد عثمان

پشاور ( ایم آر سی پی ( انڈینڈ ) ایم آر سی پی ( گلاسگو یو کے )

رہنورد، کولیسٹروال، بلڈ پریشر

ہیٹ میڈیکل انسٹیٹیوٹ حیات آباد میڈیکل کمپلیکس پشاور

ہیٹ میڈیکل کمپلیکس ہاتھامل مشن ہسپتال ڈگری گارڈن پشاور

Name

Taj Ali

Age

59

Sex

M

Date

03/11

Clinical Record

Rx

Wt -

DM

Insulin (Lantus)  
10000

Diuretic

HbA1c

11.9

RBS 24

Created

LDL 10

140/90

Aspirin

Hexaban

Rure gel Hum

ALLESIEDU

For Appointment Ring  
091-2219409  
0300-9036109

ناشہ سے اور رات بچان  
30 منٹ پہلے -  
صبح 26 یونٹ بنا

30  
26  
20

110-70 =

160-80 =

126 + = +2 units

180 + = +2 units

2  
03239102727

آئر ٹشوٹر لیول کنٹرول نہ  
ہو تو پھر یونٹ لڑھاکے  
صبح بیمار عینہ زیادہ ہو تو نہ  
دلے اور آئر شام دلے کنٹرول  
نہ ہو تو پھر صبح دلے لڑھاکے

70 سے کم  
مرزی کمزوری  
بیماری  
بھول زیادہ لگن  
سرد در  
کلیڈ آن

Cap Citarew

1040  
انٹرنل سٹریٹ

Cap Sameo

40  
انٹرنل سٹریٹ

Cap Zegab

40  
انٹرنل سٹریٹ

Cap Necvit

انٹرنل سٹریٹ

Cap Cancer

5  
انٹرنل سٹریٹ  
Cap co-exidary

30 منٹ ورزش روزانہ

ATTESTED

Physician

(11)

فریش

Dr. Akhtar Ali

M.B.B.S, F.C.P.S (Medicine)

District Medical Specialist

DHQ Hospital KDA Kohat

P.A: 0332-9639720

ڈاکٹر اختر علی

ایم بی بی ایس، ایف سی پی ایس (میڈیسن)

ڈسٹرکٹ میڈیکل سپیشلسٹ

ڈسٹرکٹ ہیڈ کوارٹر ہسپتال کوہاٹ

Pt's Name علی علی Age 60 Sex ♂ Date 15/1/2018

Clinical Record

Rx

DM 2  
90 Osmotic hyp  
+ pain lower limbs  
+ Burning feet soles

g  
p=57  
12/2/18  
CHAD

FR83-270  
mg

Tab Dimicon - 1/2  
600

① + ①

Tab Sitagen - m  
50/500

① + ①

Cap Gabrica 75  
①

①

ATTESTED

تعطیل بروز اتوار

کینٹ ہسپتال، پشاور روڈ، جنگل خیل، کوہاٹ

OTC چوک پشاور روڈ جنگل خیل کوہاٹ

(12)

- Cap. Esso 20 f  
① ————— ①

28

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→

*[Signature]*  
ATTESTED

Dr. Rehman Saeed

FCPS (Cardiology)  
MCPS (Medicine)  
Consultant Cardiologist

ڈاکٹر رحمان سعید

فیس پی ایس (کارڈیالوجی)  
فیس پی ایس (میڈیسن) کونسلٹنٹ کارڈیالوجسٹ  
انچارج سی سی یو

Incharge CCU

District Hospital Karak

ڈسٹرکٹ ہیڈ کوارٹرز ہسپتال کرک

P/Name Taj Ali Khan Age 67 Sex M Date 20/07/17

DM  
Cough  
Ch-Gastritis

Adh. 5.00/100  
Anti Hb 14/100

En P. 30  
BN. 160/90 mmHg

- R - Tab Eziday 30p
- to / Cysto 1/2 p
- to / Tab Curac 5T
- to / Tab Diamicron MR 60
- to / Tab Getryl 4mg
- to / Tab Atidac 757
- to / Tab Neuronet 50mg

ATTESTED

Tax Return for  
one year  
1914

of Esso 4000 in 1000 shares  
CBS 0 1914

- Cap Esso 4000  
0 1914

- Tax Return of 1914  
1914  
- Tax Return of 1914  
1914  
1914

  
**ATTESTED**

Dr.:

Mir Ahmad Khan

M.B.B.S, F.C.P.S

CONSULTANT

Medical Specialist & Endoscopist

Mob: 0331-9633133

0348-3012788

NO 3589-N



(15)

بیمارستان امیر احمد خان

صوبہ ایشیائی

احمد ویلفیئر میڈیکل سنٹر

اکٹر میر احمد خان

ایم بی بی ایس، ایف سی پی ایس

میڈیکل سپیشلسٹ اینڈ انڈوسکوپسٹ

برامراض دل و سینہ معدہ و ہپاٹائٹس پی ایس

گھٹا ہونے پر پیشہ بندی کا تجربہ ہوتا ہے۔ جملہ داخلی امراض

Pt's Name: Taji Ali Khan Age: 60 Sex: M Date: 21-6-19

Clinical Record

DM 2 c complications 140/90

- Gastroperum
- Constipation
- Enlarged prostate

- ECG - W.
- Blood Sugar
- UACB
- Urinalysis

Rx

1. TAB Diminor 30

2. Can Sita met 50/500 p

3. Can Dopa 5 p

4. Can mathematical 500 p

5. Can Dynamic - 50 p

Feb 2019

ATTESTED

بروز اتوار کلینک کھلا رہتا ہے۔

25/26/2019

(16)

Presenting Symptoms

- 1 \_\_\_\_\_
- 2 \_\_\_\_\_
- 3 \_\_\_\_\_

Pulse \_\_\_\_\_ BP \_\_\_\_\_

Temp \_\_\_\_\_ Pallar \_\_\_\_\_

L. Nodes \_\_\_\_\_

Jaundice \_\_\_\_\_

Clubbing \_\_\_\_\_

Bowar \_\_\_\_\_

Bladder \_\_\_\_\_

PAST HISTORY

DRUG HISTORY

Systemic Findings

Scioslo Economic

Family Hx

Gynae/obs

Provisional DX

Final DX

Test Required

*[Signature]*  
**ATTESTED**



Medical Specialist

(17)

میڈیکل سپیشلسٹ

Dr. WASEEM AKHTAR

MD/MBBS,

F.C.P.S-II (Pak),

M.R.C.P-II (U.K)

Ex. Registrar Civil Hospital & Liver Center (Faisalabad)

Ex. Registrar H.A.A.D(UAE)

P.M.D.C Reg No: 1161-2N



اکٹر وسیم اختر

بی۔ ڈی ایم بی بی ایس

ایس پی ایس (پاک)

ایس پی ایس (یو کے)

ایس رجسٹرار سول ہسپتال اینڈ لیور سنٹر فیصل آباد

ایس رجسٹرار ایچ۔ اے۔ ایے۔ ڈی (یو اے ای)

ماہر امراض جگر، دل، بلڈ پریشر، شوگر، معدہ، پریقان

Patient's Name: TAJ Ali Age 55 Sex ♂ Date 11/3/2020

Clinical Record:

Rx

Om-ii  
7.17  
Ago

Resulde

Long red

DP = 140/90

PS = 80

BP = 98/60

HR = 70

Temp = 37.5

MD = 100

Wt = 70

Ht = 170

Handwritten notes in Urdu and English, including 'Long red', 'A specimen', 'Cervix', 'measles', and '1+1'. There is a large, dark, circular stamp or drawing in the center of this section.

ATTESTED NOT VALID FOR COURT.

Contact 0345-9646056 / 0345-1933126 (اڈریس: (علی میڈیکوز) مین کامران شہنید چوک صابر آباد روڈ (کرک)

HC No: 1161-2N

Dr Akhtar Ali

M.B.B.S, F.C.P.S (MedInce)

Medical Specialist / Physician  
DHQ Hospital KDA Kohat

(18)

اسٹنٹ پروفیسر  
ڈاکٹر اختر علی

دیپٹی ڈائریکٹر، ایف ایس ای (میڈیسن)  
میڈیسن سیشٹ از نیشن  
ماہر امراض ذہنی، سید محمد، جگر برکان  
پبلک ہیلتھ انسٹیٹیوٹ، کوہاٹ

Pt's Name: Humaira Age: 60y Sex: F Date: 10-8-10

MI — Humaira 70g 30  
HTA — Ezday 50g 20

40 Abd - pain  
pain lower limb

App. 12/2/2010 12-8-10  
HTA 60 7300/

Humaira 70g 30  
950 (34)  
150 (24)

Esday 50g 20  
140 30

Das Levoprad 50g 40  
320 — 1 + 1  
Das Nuberal — 30  
15 — 1 + 1

رابطہ نمبر: 335-8617375

ATTESTED

کلینک: محمود میڈیکل سنٹر نزد کمال پلازہ پولیٹیکل تھانہ کوہاٹ

Medical Specialist

Dr. Noor-ul-Anwar

M.B.B.S. (Gold Medelst)

F.C.P.S (General Medicine)

City Hospital Karak



(19)

مڈیکل سپیشلسٹ  
ڈاکٹر نورالانوار

ایف سی بی ایس (گولڈ میڈلسٹ)  
ایف سی بی ایس (جنرل میڈیسن)  
شہری ہسپتال کرک

Not Valid For Court

Pt. Name: Tay Ali Age 60 Sex M Date 7-12-17

R

1-3/10

Case of DM, Htn

Sp. Sudden onset  
Rt side weakness

A.T.E.S

Pulse 60  
B.P. 140/80

CRP. ~~Normal~~  
WBC 4/5/5  
45 5/5

Ad. CT  
Brain

Plantar Rt equal  
left

Humulin 70/30 28  
20 units

ATTESTED

Signature: Ezidany 507

بیکنگ نمبر: 6 سے 28 اور 8 سے 6  
75 اور 76 سے 28 اور 29

0333-9199529 رابطہ نمبر: شہری ہسپتال کرک

Cap

For papers 7 & 10 on  
above case;

by Pooja Singh  
(16) 14.

Syrr Anuradha  
3 03 12

Har Anuradha

  
**ATTESTED**

# Dr. Umar Naseer

MBBS, FCPS-II (General Medicine)

Medical Specialist Endocrinology Unit

Lady Reading Hospital Peshawar

Cell: 0308-5892716



# ڈاکٹر عمر نصیر

بی بی ایس، ایف سی پی ایس II (جنرل میڈیسن)

یڈیکل سپیشلسٹ انڈو کرونولوجی یونٹ

بی بی ریڈنگ ہسپتال پشاور

پیمائش شمارہ، ڈرائیڈ، قد، زناٹ ہارمون کے مسائل

P/Name Al Khan Age 26 Sex F Date 26-2-20

### Clinical Record

### Rx

Terminology

Oral + + + / D P r + + + / L + + +

Oral + + + / D P r + + + / L + + +

B/SO  
B/G  
B/200  
Specialist

B/SO + 1

H<sup>0</sup> / C<sup>0</sup> / C<sup>0</sup> Deletary

Oral + + + / D P r + + + / L + + +

Handwritten notes and signatures in a large circle.

238

ATTESTED

ARBI D 150 & 300 mg

Handwritten signature and notes.

EVOPRIDE 1.2.3.4MG

(24)  
By Nixtal-3

To the ...  
...

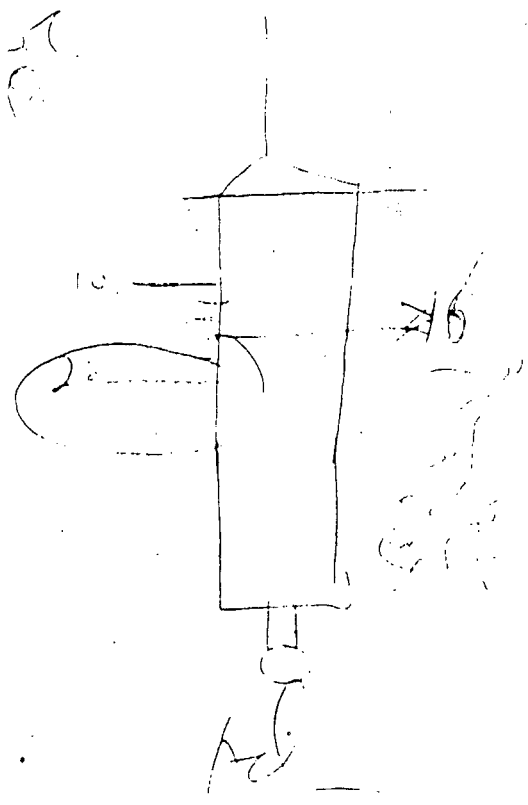
Priority  
...

Is dit B

...

Cancelled a

Dms  
4170  
Storage  
Tech



...

UP  
ATTESTED

# Dr. Asif Malik

F.R.C.S (IRE) DIP UROL (LONDON)

Professor of Urology & Renal Transplantation

Institute of kidney Diseases. Hayatabad Peshawar

19

Name: Tariq Age: 58 Sex: M Date: 16/3/22

## Clinical Record

# Rx

90 LUTS → one yr  
 ↳ poor stream  
 ↳ incomplete voiding  
 - Dysuria → 3/12  
 Spc. done → 45 days  
 (for Dysuria (+++))

DM<sup>+</sup> → 2 yrs → 3  
 insulin 70/30  
 CVA → 1000/10  
 ↳ R-sided  
 (No continued medical)

now 90.

- Dysuria is when drop passes Penetratingly.
- Suprapubic pain → wound site.

① bij A-Bac 2  
 7 - R E

PE → infected wound (spc)

- Fever - 101.0
- Backache - lower

② Tar. Azospin 1+1

Az. → 11/5/22 spc

11/5/22

③ Cep. Seroxi 1R  
 1/1

RUG

ATTESTED

*Asif Malik*

کلینک نمبر 208 دوسری منزل

O.P.D کلینک

باچھٹی

ہمارے کال علی میڈیکل سنٹر سے رابطہ کریں۔

پاکستان سٹریٹ اسپتال خیبر بازار پشاور

بروز پیر - بدھ - جمعہ

بروز ہفتہ و اتوار

پاکستان نمبر MF/44

0333-3006825 091-2591944





# KARAK MEDICAL COMPLEX

Jail Chowk District Karak  
Mob:0333-9713013

Patient Name: Taj Ali  
Age: 70 Years  
Sex: Male  
Address: Karak  
Test Required: FBC.

Registration Date: June 30, 2020  
Registration Time: 8:04:44 PM  
Lab Number: 5303  
Consultant: Dr: Rizwan Sb

| Test                           | Patient's Result | Reference Value                            |
|--------------------------------|------------------|--|
| Haemoglobin                    | 11.1 g/dL        | Male: 14 - 18 g/dL<br>Female: 12 - 16 g/dL |
| Total Leukocyte Count (T.L.C.) | 13,500 /cmm      | Adults 4,000 - 11,000 /cmm                 |
| PCV (HCT)                      | 30.6 %           | Male: 39 - 52 %<br>Female: 37 - 64 %       |
| MCV                            | 82.0 fl          | 75.0 - 95.0                                |
| MCH                            | 25.6 pg          | 27.0 - 32.0                                |
| MCHC                           | 31.3 g/dL        | 30.0 - 35.0                                |
| PLATELETS                      | 4,40,000         | 1,50,000 - 4,00,000                        |
| Differential Count             |                  |  |
| Polymorphs                     | 78 %             | 50 - 70 %                                  |
| Lymphocytes                    | 20 %             | 20 - 40 %                                  |
| Monocytes                      | 01 %             | 02 - 08 %                                  |
| Eosinophils                    | 01 %             | 01 - 04 %                                  |

Diagnosis with perfection

**ATTESTED**

Lab Incharge

T3, T4, TSH, HBS Ag, Anti HCV ELISA Method are Available

Quarries? Please Call 0342-1938877 with in 24 Hours for the free consideration of tests from the same sample.

# KARAK MEDICAL COMPLEX

Jail Chowk District Karak  
Mob: 0333-9713013

Patient Name: Taj Ali  
Age: 70 Years  
Sex: Male  
Address: Karak  
Test Required: UREA, RBS.

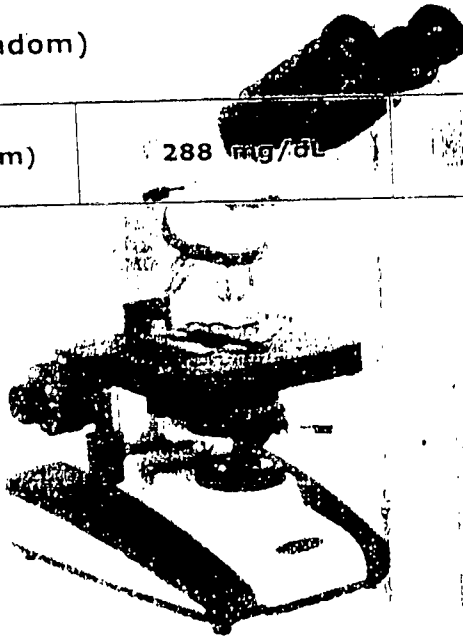
Registration Date: June 30, 2020  
Registration Time: 8:07:57 PM  
Lab Number: 5303  
Consultant: Dr. Rizwan Sb

### UREA

| Test       | Patient's Result | Reference Value |
|------------|------------------|-----------------|
| Serum Urea | 48 mg/dL         | 10 - 50 mg/dL   |

### BLOOD SUGAR (Random)

|                      |           |                |
|----------------------|-----------|----------------|
| Blood Sugar (Random) | 288 mg/dL | 70 - 150 mg/dL |
|----------------------|-----------|----------------|



Diagnosis with perfection

ATTESTED

Lab In Charge

4, TSH, HBS Ag, Anti HCV ELISA Method are Available

Quarries? Please Call 0333-9713013 within 24 Hours for the free consideration of tests from the same sample.

# Rafiq

## Poly Clinic



(27)

# رافق پولی کلینک

Shagi Road Karak

شگی روڈ کرک

\*\*\*\*\*  
Patient Reference # 6558      Date &      7/12/2019 8:27 PM      Page Number: 1  
Patient      Sex: m      Age: 2 YEARS  
Name: Taj Ali  
Khan  
Referred By: Dr Rehman Saeed      SPECIMEN: BLOOD  
Test Required: RBS s Cal H Pylori  
\*\*\*\*\*

### Test Report

\*\*\*\*\*

| TEST        | RESULTS | UNITS | REFERENCE RANGE |
|-------------|---------|-------|-----------------|
| GLUCOSE (R) | 312     | mg/dl | 70 ----- 145    |

|         |      |       |                  |
|---------|------|-------|------------------|
| CALCIUM | 10.0 | mg/dl | 8.50 ----- 10.50 |
|---------|------|-------|------------------|

H.pylori      Positive (+ive)

#### Consultant

Dr. Farid Ullah Shah  
M.B.B.S. F.C.P.S. (Urology)

Dr. Rehman Saeed  
M.B.B.S. F.C.P.S. (Cardiology)

Dr. Masood Jalal  
M.B.B.S. F.C.P.S. (Psychiatry)

Dr. Zia Ullah  
M.B.B.S. F.C.P.S. (Orthopedic)

#### LAB Incharge

Musadiq Rehman  
DMLT (Peshawar)  
C.T (Path) R.M.I

Yasir Junaid  
DMLT (JIMS Peshawar)  
C.T (path) D.H.Q karak

Note: To ensure a reliable and efficient service referring consultants are requested to contact the Lab reception within 24 hours for clarification of any results or fee repetition of the test.

**ATTESTED**

(28)

Annex "E"



OFFICE ORDER

OFFICE OF THE SUPERINTENDENT  
PRISONS CIRCLE HEAD QUARTER D.I.KHAN  
No. 4596 / PH Date 21-07-2021  
PHE FAX No. 0906-9280299  
epdikhan1@gmail.com

WHEREAS, the accused official Mr. Hamza Ali s/o Noor Taj Ali was proceeded against under Rule 2 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his misconduct that he was relieved by the Superintendent District Jail Lakkī Marwat on 20.09.2014 with nil days joining for further duty at Central Prison Bannu. He was due to resume duty at Central Prison Bannu on 01.10.2014 but he absented himself and did not join duties at Central Prison Bannu.

AND WHEREAS, he furnished reply but the same was found unsatisfactory.

AND WHEREAS, the undersigned being competent authority granted him the opportunity of personal hearing on 29.06.2021 as provided for under rules ibid. The accused official failed to defend his case with documentary proof/evidence.

NOW therefore, in exercise of powers conferred under Rule 14(3) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 having considered the charges, evidence on record, the explanation of the accused official and after affording the opportunity of personal hearing, the undersigned being competent authority, hereby award Major Penalty of "Removal From Service" to Mr. Hamza Ali S/O Noor Taj Ali for his longwinded absence. The period of his absence w.e.f 01.10.2014 to 29.06.2021 is hereby treated as the ordinary Leave without Pay.

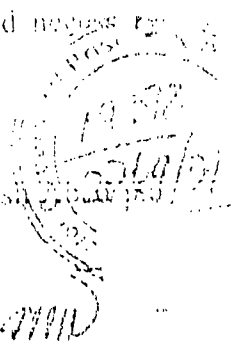
(SUPERINTENDENT)  
CIRCLE HEAD QUARTER PRISONS D.I.KHAN

Endorsement No. 4591-96

Copy of the above is forwarded to

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information.
2. The Superintendent Central Prison Bannu. Necessary entry may please be made in the D.I.K. & P. side of all the concerned under proper attestation.
3. The Superintendent District Jail Lakkī Marwat for information and necessary action.
4. DAO Lakkī Marwat & Bannu
5. Mr. Hamza Ali s/o Noor Taj Ali r/o of Kaur Kaka, Mohallah, Darisa Sabir abad Tehsil and District Karak.

ATTESTED



OFFICE OF THE SUPERINTENDENT  
PRISONS CIRCLE HEAD QUARTER DIKHAN  
NO. 4795/PB DATE 21-07-2021  
PH&FAX No.0966-9280299  
[cpdikhan1@gmail.com](mailto:cpdikhan1@gmail.com)

**OFFICE ORDER**

WHEREAS, the accused official Mr. Hamza Ali S/o Noro Taj Ali was proceeded against under Rule 3 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his misconduct that he was relieved by the Superintendent District Jail Lakki Marwat on 30.09.2014 with nil days joining for further duty at Central Prison Bannu. He was due to resume duty at Central Prison Bannu on 01.10.2014 but he absented himself and did not join duties at Central Prison Bannu.

AND WHEREAS, he furnished reply but the same was found unsatisfactory.

AND WHEREAS, the undersigned being competent authority granted him the opportunity of personal hearing on 29.06.2021 as provided for under rules ibid. the accused official failed to defend his case with documentary proof / evidence.

Now therefore, in exercise of powers conferred under Rule 14(3) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, having considered the charges, evidence on record, the explanation of the accused official and after affording the opportunity of personal hearing, the undersigned being competent authority, hereby award Major Penalty of Removal from Service to Mr. Hamza Ali S/o Noor Taj Ali for his alongwith (sic) the period of his absence w.e.f. 01.10.2014 to 29.06.2021 is hereby treated as extra ordinary Leave without pay.

Sd/-  
SUPERINTENDENT  
CIRCLE H/QS PRISON DIKHAN

Endorsement No. 4591-96/

Copy of the above is forwarded to:

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information.
2. The Superintendent Central Prison Bannu, Necessary entry may please be made in the Service Book of official concerned order proper attestation.
3. The Superintendent District Jail Lakki Marwat for information and necessary action.
4. DAO Lakki Marwat & Bannu
5. Mr. Hamza Ali S/o Noor Taj Ali R/o of Kabir Kalay Mohallah Danish Abad Sabir Abad Tehsil & District Karak.



OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

☎ 91-9210334, 9210408

☎ 91-9213448

No. Estb/Ward-Orders/ 38960 / 1-

Dated 01-12-2021 / 1-

**ORDER:**

**WHEREAS**, Warder Hamza Ali Khan S/O Noor Taj Ali Khan while attached to Central Prison D.I.Khan was awarded the major penalty of "Removal from Service" by the Superintendent Headquarters Prison D.I Khan vide his office order No. 4590 dated 21-09-2021 due to his long willful absence from 01-10-2014 to 29-06-2021 (06 years, 08 months & 28 days).

**AND WHEREAS**, the said Warder preferred his departmental appeal for setting-aside the penalty awarded to him, which was examined in light of the available record of the case and it was observed that the charges leveled against the appellant were proved.

**AND WHEREAS**, he was afforded an opportunity of personal hearing on 20-11-2021. During the course of hearing, he explained his position but failed to justify his long willful absence for the above period mentioned.


**NOW THEREFORE**, keeping in view the facts on record, the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 read with Rule-05 of Khyber Pakhtunkhwa Service Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being without any substance.

**INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA, PESHAWAR.**

Endst. No. 41-611 / 1-

Copy of the above is forwarded to: -

1. The Superintendent Headquarters Prison D.I Khan for information and necessary action with reference to his letter No. 8484/WF dated 01-11-2021
2. Superintendent Central Prison D.I Khan for information and necessary action. He is directed to inform the appellant accordingly and also make necessary entry in his Service Book under proper attestation.
3. The District Accounts officer concerned for information and necessary action.
4. Appellant concerned C/O Superintendent Central Prison D.I Khan for information.

  
ASSISTANT DIRECTOR  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

01/12/2021

  
**ATTESTED**

YASIR SALEEM

Accepted subject to the terms regarding fee

Execution Executants

IN WITNESS whereof I we have hereby signed at the day to 15<sup>th</sup> the year 2022

PROVIDED always that I have undertaken in time of calling of the case by the court my authorized agent shall inform the Advocate and make him appear in court in the case may be dismissed in default. If he proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

AND I we hereby agree to ratify and confirm all lawfully acts done on my behalf in under or by virtue of this power or of the usual practice in such matter

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

I We, the undersigned, do hereby nominate and appoint YASIR SALEEM ADVOCATE HIGH COURT, my true and lawful attorney, for me in my name and on my behalf to appear at to appear in the above matter and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and the petitions. An appeal, application, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc. and to apply for and issue summons and other writs or sub-poenas and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ or other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case with me and have the same powers.

Appeal/Revision/Suit/Application/Petition/Case No. of \_\_\_\_\_ Fiqd for \_\_\_\_\_

Plaintiff: Harmza Ali Khain  
Appellant: Harmza Ali Khain  
Petitioner: Harmza Ali Khain  
Complainant: Harmza Ali Khain  
Defendant: Inspector General  
Respondent: Inspector General  
Accused: Inspector General

In the Court of Service Tribunal Peshawar

POWER OF ATTORNEY