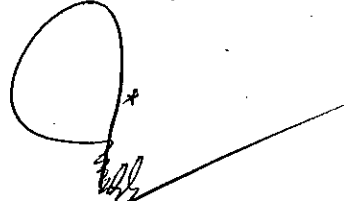


01.09.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

02. Learned counsel for the appellant submitted an application seeking permission to withdraw the instant service appeal on the ground that no formal order of the dismissal/removal from service has been issued to be agitated and impugned under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. Since the basic requirement of statutory provision is not fulfilled, the application for withdrawal of the instant service appeal is allowed. The service appeal No. 7144/2021 submitted on 21.08.2021 stands hereby dismissed as withdrawn. Consign.

03. *Pronounced in open court at Peshawar and given under my hand and seal of the Tribunal this 1st of September, 2022*


(Mian Muhammad)
Member (E)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M No. _____/2022

In

APPEAL NO. 7144/2021

MST: PARVEEN BEGUM

VS

GOVT; OF K.P.

APPLICATION FOR WITHDRAWAL OF THE ABOVEMENTIONED APPEAL FOR FILLING WRIT PETITION DUE TO NONE-AVAILABILITY OF IMPUGNED ORDER HAVEN'T ISSUED TO APPELLANT BY THE RESPONDENTS.

R/SHEWETH:

- 1- That the appellant abovementioned appeal is pending before this August Tribunal in a stage of Preliminary Hearing, fixed on dated 01.09.2022.
- 2- That the appellant have filed the abovementioned appeal against the verbal dismissal/removal from service and against the salaries stopped illegally by the respondents since 2014 without any justifiable reason.
- 3- That the appellant is not having impugned order of dismissal/removal from service due to that the appellant can't agitate the same before this August tribunal the abovementioned cause Under Section-4 of the khyber pakhtunkhwa Service Tribunal Act, 1974.
- 4- That the appellant intended to agitate the subject-matter for issuance of impugned order through Writ Petition before the Honorable High Court.

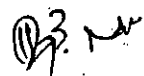
It is therefore, humbly requested that on acceptance of this application, with permission the aforementioned appeal of the appellant may very kindly be withdrawn and also to file fresh appeal after acquiring the impugned order.

Dated:31.08.2022

APPLICANT

Perveen Begum

Through:


Ayaz Khan Sherpao
Advocat high Court
Peshawar

02.06.2022

Nemo for the appellant.

Lawyers are on general strike today, therefore, to come up for preliminary hearing 08.08.2022 before the S.B.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel through registered post for the date fixed.



(Salah-Ud-Din)
Member (J)

8.8.2022 Due to The Public Holiday the
Case is Adjourned to 1-9-2022



Reader

02.11.2021

Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment for further preparation of appeal. Adjourned. To come up for preliminary hearing on 06.01.2022 before S.B.


(Mian Muhammad)
Member(E)

06.01.2022

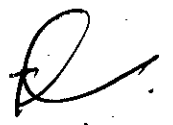
Nemo for the appellant.

Lawyer are on general strike today. Case to come up for preliminary hearing on 03.03.2022 before S.B.


(Rozina Rehman)
Member (J)

3-3-2022

Due to retirement of the Honorable Chairman the case is Adjourned to come up for the same as before on 2⁶/₂₂

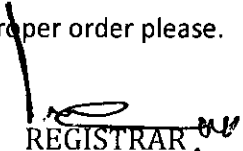

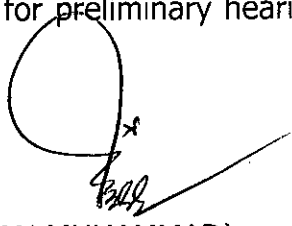

Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7144 /2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 04/08/2021 | <p>The appeal of Mst. Parveen Begum resubmitted today by Mr. Muhammad Ayaz Sherpao Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>13.09.2021</p> <p>Junior of counsel for the appellant present.</p> <p>Junior of learned counsel for the appellant requested for adjournment on the ground that learned senior counsel is not available today. Adjourned. To come up for preliminary hearing before the S.B on 02.11.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p> |

The appeal of Mst. Perveen Begum Junior Instructress Women Skill Development Centre Zairan Parachinar District Kurram received today i.e. on 02.08.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Memorandum of appeal may be got signed by the appellant.

2- Copy of impugned order is not attached with the appeal which may be placed on it.


No. 1513 /S.T,

Dt. 03/08 /2021


REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Ayaz Sherpao Adv. Pesh.


Re Submitted after compliance this court order.
The worthy department WSDC did not disposed
of the departmental appeal of the applicant since
filed by the applicant vide dated 8.4.2021 in
the concerned department.

Advocate

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: Mst Parveen Begum vs Govt of KP

| S# | CONTENTS | YES | NO |
|----|--|-----|----|
| 1 | This Appeal has been presented by: | | |
| 2 | Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents? | ✓ | |
| 3 | Whether appeal is within time? | ✓ | |
| 4 | Whether the enactment under which the appeal is filed mentioned? | ✓ | |
| 5 | Whether the enactment under which the appeal is filed is correct? | ✓ | |
| 6 | Whether affidavit is appended? | ✓ | |
| 7 | Whether affidavit is duly attested by competent Oath Commissioner? | ✓ | |
| 8 | Whether appeal/annexures are properly paged? | ✓ | |
| 9 | Whether certificate regarding filing any earlier appeal on the subject, furnished? | | |
| 10 | Whether annexures are legible? | ✓ | |
| 11 | Whether annexures are attested? | ✓ | |
| 12 | Whether copies of annexures are readable/clear? | ✓ | |
| 13 | Whether copy of appeal is delivered to AG/DAG? | ✓ | |
| 14 | Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents? | ✓ | |
| 15 | Whether numbers of referred cases given are correct? | ✓ | |
| 16 | Whether appeal contains cutting/overwriting? | | ✓ |
| 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: Muhammad Ayaaz pda.
Signature: 
Dated: 2.8.2021

BEFORE THE KHYBER PAKHTUNKHAWA
SERVICE TRIBUNAL , PESHAWAR.

Service Appeal. No. /2021

Mst Perveen Begum D/O Nazir Hussain, Junior Instructress
Women Skill Development Centre, Zairan Parachinar District
Kurram

.....Appellant

VERSUS


Govt. of Khyber Pakhtunkhwa & Others.....Respondents

INDEX


| Sr# | Description | Annexure | Pages |
|-----|--|----------|-------|
| 1. | Service Appeal | | 1-35 |
| 2. | Affidavit | | 96 |
| 3. | Application for condonation of delay along with affidavit | | 107-9 |
| 4. | Copy of the appointment order | A | 10-16 |
| 5. | Copy of Medical Documents/prescription etc of the appellant and her children | B | 17-33 |
| 6. | Copy of application/departmental appeal | C | 34-35 |
| 7. | Wakalatnama | | 36 |

Appellant

Through


M. Ayaz Khan Sherpao

&


Malak Sajid Khan

Advocates, High Court

Office:

Room No.37th, 2nd Floor,

Malik Tower, Pajjagi Road,

Peshawar

Dated:-02.02.2021

**BEFORE THE KHYBER PAKHTUNKHAWA
SERVICE TRIBUNAL, PESHAWAR.**

7144

Service Appeal. No. /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7389

Dated 02-8-2021

Mst Perveen Begum D/O Nazir Hussain, Junior Instructress
Women Skill Development Centre, Zairan Parachinar District
Kurram

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Industries,
at Civil Secretariat Peshawar
2. Director Industries and Technical Education, at
Directorate (WSDC), Peshawar.

.....Respondents

APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE RELUCTANT APPROACH
OF THE RESPONDENTS TO ALLOW THE
APPELLANT TO KEEP CONTINUE HER
SERVICE ON THE POST OF JUNIOR
INSTRUCTRESS AT WOMEN SKILL
DEVELOPMENT CENTRE, ZAIRAN
PARACHINAR DISTRICT KURRAM DESPITE
THE FACT NO DEPARTMENTAL
PROCEEDINGS OF WHATSOEVER HAS
BEEN TAKEN AGAINST THE APPELLANT'S
ABSENCE KEEPING IN VIEW REGARDING
THE DILAPIDATED/LIFE THREATENING
DISEASE OF LUMBER SPINE (BACK BONE

Filed to-day

Registrar

2/8/2021

Re-submitted to -day
and filed.

Registrar

4/8/2021

DISEASE) OF THE APPELLANT AS WELL AS
ELLIPSE SEVERE DISEASES OF THE TWO
CHILDREN, THE RESPONDENTS/
CONCERNED AUTHORITY WERE
INFORMED ON TIME TO TIME.

Prayer:-

In light of expounded subjects and facts the respondents may kindly be directed to allow the appellant to keep continue her service on the post of Junior Instructress at Women Skill Development Centre, Zairan Parachinar District Kurrām and the withheld salaries from 2014 till date may kindly be ordered to be released in favour of the appellant with all retrospective benefits as well as without any reason the illegal and unlawful deportments and reluctant approach to allow the appellant on his service may also be declared as illegal, unlawful, coram-non-judice and against the vested right of the appellant being enshrined in the mother law of the land, for the best administration of justice and fair play.

Respectfully Sheweth;

- 1) That with profound veneration the appellant being having waste experience via distinction certificates was appointed in the respondents' department in the year 2004. (Copy of the appointment order is annexed as Annexure "A").

- 2) That since the appointment, the appellant being a soft, sober woman has ever tried his best due to his painstaking and sedulous hardworking to keep the morale of the department high. Ever obedient to the officers and was performing her duty outstandingly and having unblemished service carrier.
- 3) That the stroke of misfortune hit the appellant, when she was indulged in the life threatening and dilapidated health disease of lumber spine (back bone disease). So much so, the appellant and her family were further aggravated that two children of the appellant were also having severe ellipse disease namely Abeeha Batool D/O Ashiq Hussain/Perveen Begum. Due to the aforesaid diseases the appellant was even unable to move freely and even could not afford more than 2 KG of weight and in such a doldrums sort of situation remain on the bed for the last more than 4 years via fighting against the life threatening diseases. With the blessing of Almighty Allah, now she has been fully recovered and retain on her normal position.
(Copy of Medical Documents/prescription etc of the appellant and her children are annexed as Annexure "B").
- 4) That time to time the family member do intimate the respondents regarding the dilapidated health condition of the appellant and her children. Infact the concerned authority do assured the appellant's family not to be worried about the appellant's job. And this is the reason that till date no disciplinary action of whatsoever has been taken regarding the absence of the appellant from her duty

but unfortunately, it is admitted fact that since 2014/15 the salaries of the appellant has been pensile/withheld.

- 5) That from the last one year, the respondents/concerned officers of the appellant assured to be allowed to continue her service of having the stance to properly get permission from the competent authority but unfortunately it was an undo and untrue commitments. Finally the appellant was directed to file proper application for the needful so that a proper order regarding the continuation of her service and withheld salaries may be occurred.
- 6) That accordingly the appellant has filed departmental appeal but unfortunately even after the lapse of three months, the same has not been decided and in such a doldrums sort of situation, the appellant is having no other option but to put her genuine grievance in the mercy of this Hon'ble Tribunal through the instant appeal. **(Copy of application/departmental appeal are annexed as Annexure "C")**.
- 7) That the law demands justice may not only be done but it should manifestly be seem to be done, keeping in view the reluctant approach of the respondents to allow the appellant to keep continue her service that too without any reason is not only illegal, unlawful and against the fundamental rights of the appellant. Keeping in view the appellant has served the respondents from more than decade by providing a pain stacking and sedulous hardworking duties for the high moral of the department.
- 8) That the expounded subject and facts may also be considered as ground of the instant appeal and any other

point may be raised at the time of argument for the best assistance of this Hon'ble Court.

PRAYER:-

In light of expounded subjects and facts the respondents may kindly be directed to allow the appellant to keep continue her service on the post of Junior Instructress at Women Skill Development Centre, Zairan Parachinar District Kurram and the withheld salaries from 2014 till date may kindly be ordered to be released in favour of the appellant with all retrospective benefits as well as without any reason the illegal and unlawful deportments and reluctant approach to allow the appellant on his service may also be declared as illegal, unlawful, coram-non-judice and against the vested right of the appellant being enshrined in the mother law of the land, for the best administration of justice and fair play.

پروین سید

Appellant

Through

Ayaz Khan Sherpao

& Malak Sajid Khan

Advocates, High Court
Room No.37th, 2nd Floor,
Malik Tower, Pajjagi Road,
Peshawar

Office:

Dated: 02.09.2021

~~Attest~~
Certified

That as per instruction of my client, no Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this Honorable Tribunal

**BEFORE THE KHYBER PAKHTUNKHAWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal. No. /2021

Mst Perveen Begum D/O Nazir Hussain, Junior Instructress
Women Skill Development Centre, Zairan Parachinar District
Kurram

.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa & Others.....Respondents

AFFIDAVIT

I, Mst Perveen Begum D/O Nazir Hussain, Junior Instructress
Women Skill Development Centre, Zairan Parachinar District
Kurram, do hereby solemnly affirm and declare ~~that~~ ^{along with condonation of delay} the
contents of instant appeal are true and correct to the best of my
knowledge and belief and nothing has been kept concealed from
this Hon'ble Court.

پروین بیگم

Deponent

CNIC# 21303-4390945-0

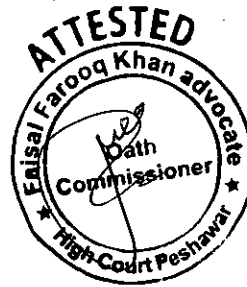
Identified by



M. Ayaz Khan Sherpao

Advocate High Court

Peshawar



7

**BEFORE THE KHYBER PAKHTUNKHAWA
SERVICE TRIBUNAL , PESHAWAR.**

C.M No._____/2021

In

Service Appeal. No. /2021

Mst Perveen Begum D/O Nazir Hussain, Junior Instructress
Women Skill Development Centre, Zairan Parachinar District
Kurram

.....Petitioner

VERSUS

Govt. of Khyber Pakhtunkhwa & Others.....Respondents

PETITION FOR THE CONDONATION OF DELAY

Respectfully Sheweth:

1. That the appellatant has filed an appeal in which no date has been fixed.
2. That as expounded the main appeal the appellatant was indulged in dilapidated and life threatening disease of lumbar spine (back bone disease) So much so, the appellatant and her family were further aggravated that two children of the appellatant/petitioner were also having severe ellipse disease namely Abeeha Batool D/O Ashiq Hussain/Perveen Begum. Due to the aforesaid diseases the appellatant/petitioner was even unable to move freely and even could not afford more than 2 KG of weight and in such a doldrums sort of situation remain on bed rest for the last more than 4 years via fighting against the life threatening diseases. With the blessing of Almighty Allah, now she has been fully recovered and retain on her normal position.

3. That the delay in filing of the appeal is not intentional or deliberate rather due to above reason.
4. That if the delay is not condoned, the petitioner will suffer an irreparable loss and injury.
5. That any other point may be raised at the time of arguments for best assistance of this Honorable Court.

PRAYER

Under the circumstances, it is humbly prayed that on the basis of expounded subject, facts and circumstances the delay in filing the appeal though on the part of respondents, may kindly be condoned, in the interest of justice and fair play.

م. ایاز خان

Appellant/Petitioner

Through

M. Ayaz Khan Sherpao

&

Malak Sajid Khan

Advocates, High Court
Room No.37th, 2nd Floor,
Malik Tower, Pajjagi Road,
Peshawar

Office:

Dated: 02.08.2021

**BEFORE THE KHYBER PAKHTUNKHAWA
SERVICE TRIBUNAL , PESHAWAR.**

C.M No. _____/2021

In

Service Appeal. No. /2021

Mst Perveen Begum D/O Nazir Hussain, Junior Instructress
Women Skill Development Centre, Zairan Parachinar District
Kurram

.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa & Others.....Respondents

AFFIDAVIT

I, Mst Perveen Begum D/O Nazir Hussain, Junior Instructress
Women Skill Development Centre, Zairan Parachinar District
Kurram, do hereby solemnly affirm and declare on oath
that the contents of instant application are true and
correct to the best of my knowledge and belief and
nothing has been kept concealed from this Hon'ble
Court.

Deponent
سیرون بیگم

CNIC# 2/303.4390945-0

Identified by

M?
M. Ayaz Khan Sherpao
Advocate, High Court
Peshawar



(A) 10

FATIMA-TUZ-ZAHRA INSTITUTE OF TECHNICAL EDUCATION PARACHINAR



Reg. No. 07653

Certificate No. 0965

Session 1-1-2000 To 30-6-2000

Roll No. 12

PARACHINAR

CERTIFICATE

has been awarded to

Mr./Miss./Mrs. Parveen Bibi

P/o, D/o, W/o Nazir Hussain

on Successful Completion of Course :-

Cutting and Sewing, Zig Zag Work, Fabric Embroidary.

in grade (A)

from this institution

[Signature]
Director

*Advised to
be true copy
D.P.
Amirzade*

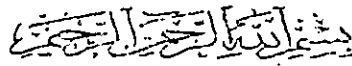
Principal *[Signature]*

Date: 27/11/2000

hammad Ayaz Sherpao
Advocate High Court
Mob: 0333-9475583

FITE.FITE.FITE.FITE.FITE.FITE.FITE

S. No 004268



Roll No. 6754

DIRECTORATE OF TECHNICAL EDUCATION & MANPOWER TRAINING

N.W.F.P. TRADE TESTING BOARD
PESHAWAR



G-III

Session SUPPLY, 2005.

This is to certify that

Mr./Ms. PARVEEN BEGUM S/D of Mr. NAZEER HUSSAIN

Resident of KURRAM AGENCY

Registered No. SDC/W/PR/H/EM8/03-21 Trainee of GTVC/(W) PARACHINAR

appeared and passed the Trade Proficiency Test in accordance with the requirement of the Trade Testing Board Skill Standards for (12 MONTHS) prescribed by the Directorate of Technical Education and Manpower Training / Provincial Training Board in the trade of TAILORING-HAND EMBEY:

The test was conducted by the N.W.F.P. Trade Testing Board in the month of APRIL, 2005.

He/She demonstrated the following standards of proficiency:—

1. Practical

2. Theory

MARKS OBTAINED= 198/400

and in recognition thereof this TRADE CERTIFICATE is issued on the 20TH day of the month of SEPTEMBER, 2005.

SECRETARY

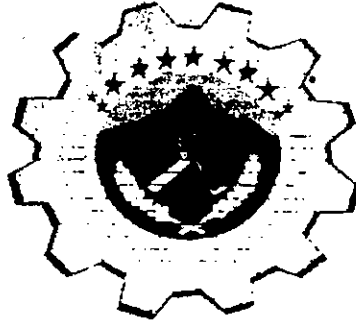
Ahmed

Dr. Nazeer

Muhammad Ayaz Sherpao
Advocate High Court
Ph: 0333-9775563

CHAIRMAN

Federally Administered Tribal Areas



Development Corporation,
N.W.F.P. PESHAWAR

SESSION 2002

THIS IS TO CERTIFY THAT

MISS PARVEEN BIBI DAUGHTER OF NAZIR HUSSAIN

OF WOMEN SKILL DEVELOPMENT CENTRE PARACHINAR KURRAM AGENCY HAS
SATISFACTORILY COMPLETED THE SIX MONTHS COURSE IN MONTH OF APRIL 2002 IN
THE FOLLOWING SUBJECTS :-

- | | |
|--------------------|------------------------------|
| 1. DRESS DESIGNING | 4. MACHINE & HAND EMBROIDERY |
| 2. TAILORING | 5. HAND & MACHINE KNITTING |
| 3. CUTTING | |

IN RECOGNITION THEREOF THIS

CERTIFICATE IN VOCATIONAL TRAINING

IS AWARDED TO HER AT PARACHINAR KURRAM AGENCY

ON THE 30TH DAY OF THE MONTH OF APRIL 2002

Aminah
BZ
Muhammad Ayaz Shehzad
Advocate High Court
Mob: 0333-9175563

Sakina Bibi
Instructor

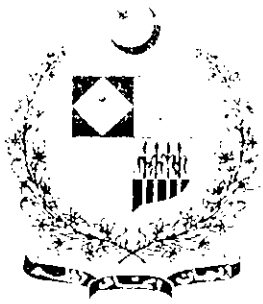
[Signature]
Project Officer

[Signature]
Additional Director (Industries)
Addl: Director (Ind. Planning)
PATA Development Corporation
Peshawar.

No. 18

Government of Pakistan

Ministry Of Social Welfare & Special Education



Community Development Centre

KURRAM AGENCY (FATA)

Certificate of Achievement

This is to certify that Mr. / Miss/ Mrs. Parveen Begam

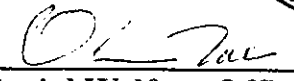
Son/Daughter/Wife of Mr. Air Hussain Registration No. 258 of Kurram Agency

has successfully completed the prescribed 12 months course from 1/1/2012 To 31/12/2012

The candidate obtained 300/400 marks in the practical examination at the end of training, comprised of the following

1. Dress Designing
2. Tailoring
3. Cutting
4. Hand Embroidery
5. Hand Knitting

Date: 1/1/2013

Aswaid

 Social Welfare Officer
 Social Welfare Officer/DDO
 Community Development Centre

14

GENERAL SECRETARIAT (PATA)
FEDERAL TERRITORY OF PESHAWAR (WSDC)
WARSAK, ROAD PESHAWAR

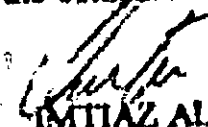
Date of Posting: 27/10/2004

OFFICE ORDER

The competent authority is pleased to issue the posting orders of the following Senior / Junior Instructresses in Women Skill Development Centers noted against each at Kurram Agency.

| <u>S.No.</u> | <u>Name of Instructress</u> | <u>Designation</u> | <u>Center of Posting</u> |
|--------------|-----------------------------|---------------------|--------------------------|
| 1. | Miss Unime Farwah | Senior Instructress | WSDC Parachinar. |
| 2. | Miss Hamida Rano | Junior Instructress | -do- |
| 3. | Miss Zahina Saeed | Junior Instructress | -do- |
| 4. | Miss Farah Naz | Senior Instructress | WSDC Baddama |
| 5. | Miss Syeda Bibi Zainab | Junior Instructress | -do- |
| 6. | Miss Wajiha Sumbul | Senior Instructress | WSDC Kamal Khan Ali Zai |
| 7. | Miss Sughra Ishaq | Junior Instructress | -do- |
| 8. | Miss Alia Begum | Senior Instructress | WSDC Durrani. |
| 9. | Miss Akbar Nissa | Junior Instructress | -do- |
| 10. | Miss Bibi Marzia | Senior Instructress | WSDC Arwaza. |
| 11. | Miss Parveen Begum | Junior Instructress | -do- |

The concerned Senior/Junior Instructresses are advised to join their duty in the above-mentioned centers immediately and submit the compliance report to this office for its record.


IMTIAZ ALI
Assistant Director (Ind)
Project Officer (WSDC)

C.C.To

1. The P.S to Secretary to Governor FATA Peshawar.
2. The accountiam WSDC Head Quarter office Peshawar.

Accepted
by
Muhammad Ayaz Sherpao
High Court
1533-9175563

**GOVERNOR'S SECRETARIAT (FATA)
NWFP, PESHAWAR.**

No. 1397 /WSDC/GS/FATADated Peshawar the 15 /05/2004.

To:-

Miss Parveen Begum
d/o Nazim Hussain

Subject:- EMPLOYMENT ON CONTRACT BASIS.

On the recommendations of the Selection committee, you are hereby offered the post of Jum Instructress, in the Women Skill Development Center, on contract basis on the following terms and conditions:-

| | | |
|-----|------------------------|---|
| 1- | Fixed Pay | Rs. <u>5000/- PM</u> |
| 2- | Period of contract. | Two years. |
| 3- | Pension. | The service rendered under the present Contract shall not qualify for pension or Gratuity benefit. |
| 4- | Allowances. | Not admissible except TADA as per rules in-vogue. |
| 5- | Leave | Usual leave will be admissible. |
| 6- | Medical Facility. | Not Admissible. |
| 7- | GP Fund. | -do- |
| 8- | Benevolent fund. | -do- |
| 9- | Seniority. | Not applicable. |
| 10- | Termination/Extension. | Services terminable on one month notice or on payment of one month pay in lieu off on either side without assigning any reason. |

If you accept the above terms and conditions of appointment, please send your acceptance alongwith attested copies of your testimonial and medical fitness certificate from a Registered Medical Practitioner to the Project Officer Women Skill Development Centers Governor's Secretariat (FATA) with in 7 days of the receipt of this letter.

The offer of appointment will be treated as cancelled if you do not convey acceptance there of within the above specified time.

Amended by

127
Ahad Ayaz Sherpao
State High Court
333-9175563

Amiaz Aali
Amiaz Aali
Assistant Director (Ind)/Project Officer
Governor's Secretariat (FATA)
Peshawar.

GOVERNOR SECRETARIAT (FATA)
DIRECTORATE OF INDUSTRIES (WSDC)
WARSAK ROAD PESHAWAR

No. 2603 - 15/105 - WSD/WSDC

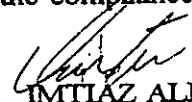
Dated Peshawar the 27 /07/2004.

OFFICE ORDER

The competent authority is pleased to issue the posting orders of the following Senior / Junior Instructresses in Women Skill Development Centers noted against each at Kurram Agency.

| <u>S.No</u> | <u>Name of Instructress</u> | <u>Designation</u> | <u>Center of Posting</u> |
|-------------|-----------------------------|---------------------|--------------------------|
| 1. | Miss Umme Farwah | Senior Instructress | WSDC Parachinar. |
| 2. | Miss Hamida Bano | Junior Instructress | -do- |
| 3. | Miss Saima Saeed | Junior Instructress | -do- |
| 4. | Miss Farah Naz | Senior Instructress | WSDC Baddama |
| 5. | Miss Syeda Bibi Zainab | Junior Instructress | -do- |
| 6. | Miss Wajiha Sumbul | Senior Instructress | WSDC Kamil Khan Ali Zai |
| 7. | Miss Sughra Jana | Junior Instructress | -do- |
| 8. | Miss Alia Begum | Senior Instructress | WSDC Durrani. |
| 9. | Miss Akbar Nissa | Junior Instructress | -do- |
| 10. | Miss Bibi Marzia | Senior Instructress | WSDC Arwaza. |
| 11. | Miss Parveen Begum | Junior Instructress | -do- |

The concerned Senior/Junior Instructresses are advised to join their duty in the above-mentioned centers immediately and submit the compliance report to this office for its record.


IMTIAZ ALI
Assistant Director (Ind)
Project Officer (WSDC)

C.C.To

1. The P.S to Secretary to Governor FATA Peshawar.
2. The accountant WSDC Head Quarter office Peshawar.

Amir

Hamid Ayaz Shehbaz
Advocate High Court
1099239175563



Psychiatrist / psychotherapist

Dr. Khwaja younas Orakzai

M.B.B.S, M.C.P.S (PSY) DCP-PSYCH (IRELAND)
RMP, Mood Disorder (USA)
Govt. Lady Readig Hospital Peshawar.
Incharge Babul Madina Psychiatry Hospital

Sumaira Mehreen (Clinical Psychologist)

Room: C-10 3rd Floor khushal Medical Center Dabgari Garden Peshawar.

Ph: 0331-9049848

Date: 15/04/15

ڈاکٹر خواجہ یونس اورکزئی

ماہر امراض نفسیات، جنسیات، منشیات
دماغی سر درد، ڈپریشن، یادداشت کمزوری
مردانہ کمزوری، مرگی، بے اولادی

Not Valid For Court

(A-m)

Abecho keto

ing

10/6

12/11 - 11/11

Venky

1/4

Syn Epinal

1/2 + 1/2 + 1/2

4/10

Syn Perzom

9/01 1/10

6/3 @ ing

Syn Lepo

3ml + 3ml

Berria

by 4/6

Muhammad Ayaz Sherpao
Advocate High Court
Mob: 0333-9175563

Riv: ml camps

3 + 1
6/5

4/6

Syn. Moxicon + 1/2 + 1/2

6/3 @ 14/1

Syn. 1 + 1 @ 8

Syn. 9/01 @ 8

6/3 @

6/3 @

6/3 @

Syn. Moxicon 1/2 + 1/2

6/3 @

Ultrasound, X-Ray, CT Scan & MRI Specialist

Dr. Mohammad Iqbal

M.B.B.S, D.T.C.D, D.M.R.D, F.R.C.R-II (UK)

Assistant Professor

Radiology Department

Lady Reading Hospital

Peshawar - PAKISTAN

ڈاکٹر محمد اقبال ایم بی بی ایس ڈی ایم ایف آر آئی پی سی اے

ڈاکٹر محمد اقبال

ایم بی بی ایس ڈی ایم ایف آر آئی پی سی اے (یو کے)

اسٹیشنڈ پروفیسر (ریڈیا لوجی)

ریڈی ریلوے ہسپتال، پشاور، پاکستان

Name: Abceha

Age: --Years

Sex: Female

Ref. By: Dr. Younas

Date: 27-11-2014

CT Brain without contrast

Indication: To rule out space occupying lesion.

Technique: Axial pre contrast sections are acquired through the brain.

Findings:

Lateral ventricles are minimally dilated.

No focal mass is seen.

No mass effect or midline shift is noted.

No posterior fossa mass.

Mastoid air cells are normal on either side.

Visible portions of frontal sinuses are normal.

Visible bones and extracranial soft tissues are normal.

Conclusion: Minimal hydrocephalus.

Muhammad Azeem

Muhammad Azeem Sherpao
Advocate High Court
Mob: 333-9175563

Dr. Mohammad Iqbal

Psychiatrist /psychotherapist

Dr. Khwaja younas Orakzai

M.B.B.S, M.C.P.S (PSY) DCP-PSYCH (IRELAND)
RMP, Mood Disorder (USA)
Govt. Lady Readig Hospital Peshawar.
Incharge Babul Madina Psychiatry Hospital
Sumaira Mehreen (Clinical Psychologist)

Room: C-10 3rd Flowr khushal Medical Center Dabgan Garden Peshawar.
Ph: 0331-9049848

Date: 27/11/16

Abeerha winter

4y

20 (3)

Ph - P, cy, 11m,
Phy. v.

ڈاکٹر خواجہ یونس اورکزئی

ماہر امراض نفسیات، جنسیات، منشیات
دماغی سردرد، ڈپریشن، یادداشت کمزوری
مردانہ کمزوری، مرگی، بے اولادی

N.M
=
Lipid
+ 3cc
cyp. 4y
cyp. 4y
cyp. 4y

Seizures
" " " "

- syp 4y
" " " "

- syp 4y
" " " "

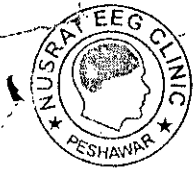
- syp 4y
" " " "

- syp 4y
" " " "

Attended by

Muhammad Ayaz Sherpao
Advocate High Court
Mob. 0333-9173553

Phy. v.
Phy. v.
Phy. v.



NUSRAT EEG CLINIC

Back Khyber Medical Center Opp; Mosque Near Peshawar Laboratory
Dabgari Garden Peshawar. Mob: 0332-9184285

EEG REPORT

PATIENT NAME:

ABEEHA BATOOL

AGE:

2 YRS

SEX:

F

REFERRING DOCTOR:

DR ADNAN KHAN

DATE:

17-7-2013

This is a digital EEG Machine based on 10-20
Standard international electrode placement system

INTERPRETATION:

EEG recorded under sedation showing background normal rhythmical activity. No focal or generalized epileptiform abnormality recorded. Provocative stimulation could not performed. Photic stimulation was unobtainable.

COMMENTS This EEG record shows no evidence for any abnormality. Please correlate with clinical picture and history.

DR ADNAN KHAN
FRCGP (LONDON), FRCPP (UK)
European certification in
Neurophysiology (EUROPEAN)
NEUROLOGY UNIT
PESHAWAR

SIGNATURE:

NUSRAT GUL
BSC Neurophysiology

Reviewed by

Muhammad Ayaz Sherpao
Advocate High Court
Mob: 0333-9178563

FATA SECRETARIAT
SOCIAL SECTORS DEPARTMENT
DIRECTORATE OF SOCIAL WELFARE FATA.
ASSESSMENT OF PERSON WITH DISABILITY PWD

Registration No. _____ Dated: _____

01-Name: ABINA BATOOL 02-Father Name: ASHIQ HUSSAIN

03-Married/Un-married: _____ 04-Spouse: _____

05-CNIC No: _____ 06-Date of birth: 2012

07-Qualification: _____ 08-Type of Disability: Physical

(Physical/Visual/Hearing/Mental/Multiple)

09-Nature of Disability: _____

10-Cause of Disability: Cerebral Palsy

11-Typ of Job can do: _____ 12-Source of Disability: _____

13-Applied for: FINANCIAL AID 14-Ph No: 03049679607

15-Present Address: vill. Shakerdava of Kunwar

16-Permanent Address: _____

RECOMMENDATIONS OF THE ASSESSMENT COMMITTEE

17-Applicant is declared: Disabled/Not disabled _____

18-Disability / Impairment: _____

19-Fit/Not fit for work: _____

20-Type of job advised: _____ 21-Referred to expert _____

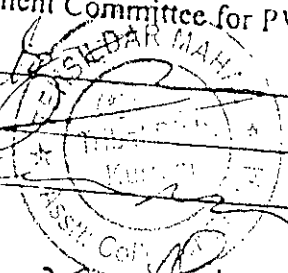
22-Recommendations to Social Welfare Department FATA (i) _____
(ii) _____

Chairman Agency Assessment Committee for PWD

Signature _____

Name _____

Findings _____



(i) Member. Dr. Bhatt

(ii) Member. Dr. Raza

(iii) Member. [Signature]

Signature _____

Signature _____

MEDICAL SUPERINTENDENT
District Head Quarter Hospital,
Parachinar.

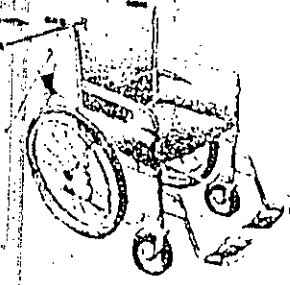
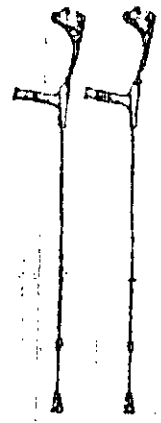
Dated 15/7/2022

Alleged by [Signature]

[Signature]

تنظیم الفلاح معذوران کرم

حافظہ ابن سیر شہید



تقدیر کنندہ کا تصویر

حافظہ بیان

میں سہمی امساۃ اہلسیر رسول و دینت عاشقین کاؤن شکر درون

شناختی کارڈ نمبر: بی بی فون 03049679607 وجہ معذوریت ذہنی حلالہم

میں یہ اقرار کرتا کرتی ہوں۔ کہ میں اس تنظیم معذوران کے ساتھ ہر قسم کی تعاون کیلئے ہر وقت تابع دار ہوا اگر تنظیم والو کو کسی قسم کی تعاون یا مدد کی ضرورت ہو تو میں خدا رسول کو حاضر و ناظر جان کر قربانی سے دریغ نہیں کرونگا۔

جنرل سیکریٹری

کا دستخط

ممبر شہید کنندہ کا دستخط

ممبر شہید کے سربراہ یا والد کا نام اور دستخط

تنظیم الفلاح معذوران کرم

کا صدر کے

Handwritten signature and stamp area.

دستخط

نام

24

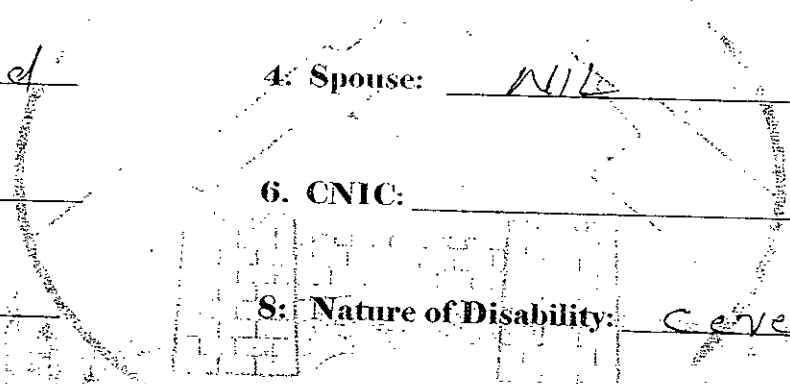
**GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE MERGED AREAS
OFFICE OF THE SOCIAL WELFARE DISTRICT KURRAM**

Reg. No. SWDK/2020-21/417

Dated: 18 / 01 / 2021

DISABILITY CERTIFICATE

- 1. Name: ABITHA BATool
- 2. Father Name: ASHIQ Hussain
- 3. Married / Un-married: unmarried
- 4. Spouse: NIL
- 5. Date of Birth: 2012
- 6. CNIC: _____
- 7. Qualification: NIL
- 8. Nature of Disability: cerebral palsy
- 9. Present Address: village Shakar dara UPPER KURRAM Parachinar
- 10. Permanent Address: AS Above
- 11. Recommendations of the Board for Disability Certificate: (Attached)



Handwritten signature/initials

Handwritten signature
**Social Welfare Officer
Social Welfare Officer
District Kurram
Govt. of Khyber Pakhtunkhwa**

CRC No: 21808842

حکومت پاکستان
نیشنل ڈیٹا بیس اینڈ رجسٹریشن اتھارٹی (وزارت داخلہ)
اٹھارہ سال سے کم عمر بچوں کا سرٹیفکیٹ *

۵۱

21303-4390945-0

درخواست دہندہ کا شناختی کارڈ نمبر:

پروین بیگم

درخواست دہندہ کا نام:

| مذکورہ | پیدائش کا ضلع یا ملک تاریخ پیدائش | جنس / رشتہ | والد کا نام اور شناختی کارڈ نمبر | والد کا نام اور شناختی کارڈ نمبر | بچے کا نام اور رجسٹریشن نمبر | نمبر شمار |
|--------|--------------------------------------|--------------|----------------------------------|----------------------------------|------------------------------|-----------|
| | ۲۰۱۲-۰۱-۰۱ | لڑکی بیٹی | پروین بیگم 21303-4390945-0 | ماشق حسین 21303-4296143-1 | ایمان تہل 21303-7068638-2 | 1 |

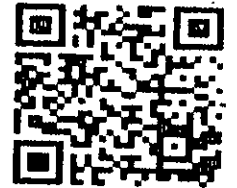
- 1- اس فیملی کے مندرجہ بالا اٹھارہ سال سے کم عمر 1 بچے 1 بچوں کا اندراج ہمارے ریکارڈ میں موجود ہے۔
- 2- درج شدہ بچے کی عمر اٹھارہ سال ہوتے ہی شناختی کارڈ کے حصول کیلئے درخواست جمع کروائیں۔
- 3- اس سرٹیفکیٹ کو سنبھال کر رکھیں کیونکہ بچوں کے اٹھارہ سال کی عمر کو پہنچنے پر اپنی نمبروں کے حوالے سے شناختی کارڈ جاری کئے جائیں گے۔
- 4- نوزائیدہ بچے کا نووری طور پر اندراج کروائیں اور نیار رجسٹریشن سرٹیفکیٹ حاصل کریں۔
- 5- کوائف کی تبدیلی کی صورت میں نیار رجسٹریشن سرٹیفکیٹ حاصل کریں۔

عثمان یوسف حسین

دستخط رجسٹرار جنرل

تاریخ اجراء: 2021-02-01

Approved
by
DR



اسامیہ کالونی، پارہ چنار، تحصیل اہل کرم، ضلع کرم، پنجس



2130343909450

MUSTAFA SURGICAL HOSPITAL

PARACHINAR

DISCHARGE SLIP

Phone No: 0926
311876

204
310

Surgeon DR. Masooma

Patient Name Parveen

Age _____ Sex _____

D/OIA 12.6.11 D/OIO 12.6.11

D/OID _____

Blood Group _____

INVESTIGATIONS

- HBS >
- HCV neg
- RBS = 95mg/dl
- _____

Diagnosis G2 P1 O RPE Breach & BPH

Operation Em. S.C. Section for

Technique _____

Operation Finding - fetal distress

- alive @ 08:45 + 10/10
- _____
- _____

TREATMENT AT HOSPITAL

- 10mg Paracetamol 10am 11 & B.P
- 100mg IV X 2
- 8mg Paracetamol 8am 11 & B.P
- 100mg IV X 2
- 200mg blood give
- _____

TREATMENT FOR HOME

- Tab. Augmentin 500
- Tab. Paracetamol 1111 (15)
- Tab. Klint 1111 (7)
- Cap. Sarsaparil 1111 (15)
- Tab. Galvan 1111 (15)
- _____

Accepted by DR

گھر کے لئے ہدایت

(ب) ان لہجہ ٹائپنگ سکول کی

2

3

4

5

Dr. Signature

مصطفیٰ سرجیکل ہسپتال میں ماہر ڈاکٹروں کی زیر نگرانی

ہڈی، جوڑ، پٹھہ، کمر کا درد، فالج، پولیو، ٹیڑھے پاؤں

پیٹ، معدہ کے آپریشن، کان، ناک، گلہ، آنکھ، زچہ و بچہ

کے آپریشن کئے جاتے ہیں

داخلے کے لئے خوبصورت اور کشادہ کمرے

24 گھنٹے سروس کی سہولت موجود ہے

MUSTAFA SURGICAL HOSPITAL LAB



مصطفیٰ سرجیکل ہسپتال لیب

OPP: A.H.Q. HOSPITAL PARACHINAR

موب: 0345-8846178 فون: 0926-311876

Patient's Name: Parveen

Date: 12.6.11

Refer By: _____

Lab No: _____

BIO CHEMISTRY HEMATOLOGY

| S.# | TEST | RESULT | NORMAL VALUE | TEST | RESULT | NORMAL VALUE |
|-----|--------------------|-----------|-----------------|-----------------|--------|-------------------|
| 1 | Glucose fasting | 9.5 mg/dl | 70-110 mg/dl | HB % | | M= 14-16 F=12-16 |
| 2 | Glucose rand | | Upto 100 mg/dl | ESR % | | M 4-10, F 6-12 mm |
| 3 | AST (SGOT) | | Upto 40 u/l | PLC | | 4000-11000/cmm |
| 4 | ALT (SGPT) | | Upto 50 u/l | DLC | | |
| 5 | ALK Phosp. | | 170-258 u/l | Neutrophils | | 40% - 75% |
| 6 | Bilirubin Total | | 0.2-1 mg/dl | Lymphocytes | | 20% - 45% |
| 7 | direct Bilirubin | | Upto 3 mg/dl | Eosinophils | | 01% - 6% |
| 8 | Indirect Bilirubin | | 0.7 mg/dl | Basophile | | 01% |
| 9 | Total Protein | | 6.6-8 mg/dl | Monocytes | | 02% - 10% |
| 10 | Albumin | | 3.2-5 mg/dl | Platelets Count | | 15-375 mill/cmm |
| 11 | Globulin | | 1.8-3.5 mg/dl | RBC Count | | 4.5-5.5 mil/cmm |
| 12 | Urea | | Upto 50 mg | Bleedin Time | | 02-5 minutes |
| 13 | Creatinine | | 0.2-1.2 mg/dl | Clotting Time | | 05-12 minutes |
| 14 | Uric Acid | | M=2.6-7.0 F=5.7 | | | |
| 15 | Cholesterol | | Upto 200 mg/dl | | | |
| 16 | Triglyceride | | Upto 250 mg/dl | | | |
| 17 | Serum Calcium | | 9-11 mg/dl | | | |

IMMUNOLOGY URINE FACES EXAMINATION

| TEST | RESULT | URINE | FACES EXAMINATION |
|---------------------|----------|------------------|-------------------|
| 1 Rheumatoid Factor | | Albumin | Color |
| 2 Mantoux Test | | Sugar | Blood |
| 3 Toxoplasmosis | | Bile Salts | Mucus |
| 4 VDRL | | Bile Pigments | Pus Cells |
| 5 Pregnancy | | Red Cells | Red Cells |
| 6 ASO1 | | Pus Cells | Ova |
| 7 H.B.V | Negative | Epith Cells | St |
| 8 H.C.V | Negative | Casts | Parasite |
| 9 H.I.V | | Others | |
| 10 H. Pylori | | | |
| 11 Blood Group | B+ve | | |
| 12 Rhuses Factor | Positive | ICT Tuberculosis | |
| 13 Widal Test | | Sputum for AFB | |
| 14 FO | | Malaria Parasite | |
| 15 AH | | | |
| 16 Bacella | | | |
| 17 AN | | MELT | |
| 18 Exphidot | | Igm | |

Handwritten notes:
 Negative
 Negative
 B+ve
 Positive
 All done by
 DS

Handwritten notes:
 This should be done
 Patient's urine
 Some bone
 Previous
 Tampon
 Sepalane based
 13.7.11

Neurosurgeon

Dr. Muhammad Usman Khan

نیوروسرجن

MBBS, MCPS, FCPS (Neurosurgery)

Associate Professor

Jinnah Medical College Peshawar

PMDC No: 10211-N

ڈاکٹر محمد عثمان خان

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس (نیوروسرجری)

ایسوسی ایٹ پروفیسر جناح میڈیکل کالج پشاور

Patient Name: Perveen Begum Age: 38 Sex: F Date: 7/12/2020

MRI
Normal

cap. Euso 20mg
do 1 1+1

cap. Regalen 75mg
do 2 1+1

Writed by
Dr

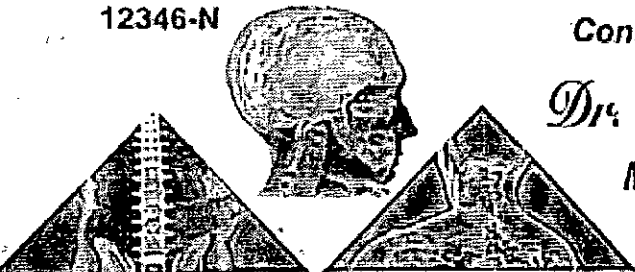
PMDC No:
12346-N

Consultant Neurosurgeon

کنسلٹنٹ نیوروسرجن

Dr. Shahid Mehmood
M.S. Neurosurgery

ڈاکٹر شاہد محمود
ایم. ایس. نیوروسرجری



Pt. Name: Farveen Begum Age 35 Date: 21/12/2017

Clinical Record

LBP. Lt. 7 Rt.
L3-S1

Roc

Lumbar Corset

Tab Dolonap 12

8 تا 10 گولیوں تک

Cap Novoteph 1+1

10 تا 12 گولیوں تک

Tab Prolexa 10mg

Tab Neirogen 1+1

Assisted by

[Signature]

[Signature]

PMDC No:
12346-N

Consultant Neurosurgeon

کنسلٹنٹ نیوروسرجن

Dr. Shahid Mehmood
M.S. Neurosurgery

ڈاکٹر شاہد محمود
ایم. ایس. نیوروسرجی

Pt. Name:

Farveen Begum

Age 34

Date:

8/6/2024

Clinical Record

Ct Scan

Assessed by
DR

Rac

R

1. Cap Triac / Mlep

SLK 50002

2. Tab Etong Long

SLK 1011

3. Tab Fowidol

SLK 1011

4. Tab Samide Song

SLK 1011

5. Cap Inezol / Enkan Long

SLK 1011

Tab Betmelan

SLK 1011

📍 Clinic: C-1 Khattak Medical center
Dabgarl Garden Peshawar
☎ 091-2566080 Mob: 0323-4941631
WhatsApp: 0323-4941631

کلینک: C-1 خٹک میڈیکل سنٹر
ڈابگری گارڈن پشاور

وقت کلینک:
دن 1:00 بجے سے
رات 8:00 بجے تک

کلینک

Neurosurgeon

Dr. Muhammad Usman Khan

نیوروسرجن

MBBS, MCPS, FCPS (Neurosurgery)

Associate Professor

Jinnah Medical College Peshawar

PMDC No: 10211-N

ڈاکٹر محمد عثمان خان

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس (نیوروسرجری)

ایسوسی ایٹ پروفیسر جناح میڈیکل کالج پشاور

Patient Name: Perveen Begum Age: 33 Sex: F Date: 6/10/2015Jas Rotee
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DIABETIC

Egordle

۲۷۲۷۲

Allied
by
DOPKamran
22/10/15
25/10/15

NOT VALID FOR MEDICO LEGAL PURPOSE

شہرہ جہاں کے لیے ان نمبروں پر رابطہ کریں
091-2214800

تعمیراتی مرکز ہفت روزہ اتوار

اوقات کار: دوپہر 2 سے لیکر شام 6 بجے تک
کلینک: صدر بلڈنگ نزد ذہرہ ہسپتال ڈگری کالون پشاور

Consultant Neurologist & Diagnostic Neuro-Radiologist

Dr. Adnan Ali Shah

MBBS, Msc. (Clinical Neurology) (London)
MCPS (Diagnostic Radiology)
MBPNA (London)
Pg. Cert NRAD (London)
DANP (London)
PMDC: 15030-N



Neurology Clinic

مشاور عصبی و تشخيصی عصبی-رادیالوجسٹ
ڈاکٹر عدنان علی شاہ
ایم بی بی ایس، ایم سی پی ایس (لندن)
ایم بی پی این اے (لندن)
پگ سیٹ آر ایڈ (لندن)
ڈی این پی (لندن)
ایم ڈی سی 15030-ن

Patient Name: Parveen Begum Age: 32 Gender F Date 3/11/2014

First Visit Follow Up

History

① Radiculopathy
 L3-L4
 L4-L5 PIRD
 L5-S1 ADD
 Tab. Paracetamol 1-1-1
 Cap. Gabapentin 1-1-1
 Tab. MTC 0.5 1-1-1
 Cap. Vitamin 1-1-1
 Voltaren Emulgel 1-1-1
 MTP 0.5g
 ایسے کون دوس کھانے باقی

Clinical Findings

GPE:
BP:
PULSE:
CNS Exam:

Advice

Followed by
DR

دن بعد تشریف لائیں۔

دوبارہ معائنہ کیلئے آئیے۔

Not Valid For Court

ماہر امراض نوردرد، بلڈ پریشر، اعصابی کمزوری، اعصابی رگ دپٹھے، کمزور عرق التلاء، مرگی تاج، لتوہ، ڈیپریشن

Address: Khattak Medical Center 3rd Floor, Room # 3, Dubgari Garden Peshawar
For appointment: 0304-0000699

Neurosurgeon

Dr. Muhammad Usman Khan

نیوروسرجن

MBBS, MCPS, FCPS (Neurosurgery)

Associate Professor

Jinnah Medical College Peshawar

PMDC No: 10211-N

ڈاکٹر محمد عثمان خان

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس (نیوروسرجری)

ایسوسی ایٹ پروفیسر جناح میڈیکل کالج پشاور

Patient Name: Parveen Begum Age: 39 Sex: F Date: 27, 8, 2014Lt. scleriteciared - 300Altered by
BR

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| | 1 + 1 | |

NOT VALID FOR MEDICO LEGAL PURPOSE

نمبر حاصل کر کے دیکھیں اور نمبر پر رابطہ کریں۔

091-2214800

تعمیراتی پروگرام کے تحت

اوقات کار: دوپہر 2 سے لیکر شام 6 بجے تک
کے جے ایم ایف جے ایم ایف ہسپتال ڈگری گارڈن پشاور

To,

The worth Director,
Industries & Technical Education
Khyber Pakhtunkhwa, Peshawar

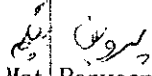
DEPARTMENTAL APPEAL AGAINST YOUR GOODSELF
SUBORDINATE OFFICIALS WHO WITHOUT ANY REASON
AND LEGAL JUSTIFICATION NOT ALLOWING THE
APPELLANT TO KEEP CONTINUE HER SERVICE NOR
READY TO GIVE THE WITHHELD SALARIES SINCE 2014
TILL DATE KEEPING IN VIEW THE
APPELLANT/UNDERSIGNED WAS INDULGED IN THE LIFE
THREATENING DISEASE OF LUMBER SPINE AS WELL AS
TWO CHILDREN OF THE APPELLANT ARE STILL
INDULGED IN SEVERE DISEASE OF ELLIPSE BEING
CLEARED FROM THE ATTACHED MEDICAL DOCUMENTS.

Respected Sir,

That the undersigned was appointed in your good self Department in the year 2004 and was performing her duty diligently without having any Departmental issue till 2014. During the entire period of more than 10 years, the undersigned being sober and soft placid lady. Tried her level best to keep the moral of the Department high. The stroke of misfortune hit the appellatant, when indulged in the ibid life threatening diseases and was further

aggravated to have ellipse disease to both the children. In such a situation, the appellant's family time to time informed the colleagues and competent authority of your good self department and in reply the appellant and her family were pampered not to worry about the job. Now with the blessing of Almighty ALLAH, the undersigned has been fully recovered but unfortunately your good self subordinate staff is reluctant to allow the undersigned to keep continue her service as well as to give the withheld salaries. Despite the fact no Disciplinary action of whatsoever has been taken against the undersigned hence being also the stance of your subordinate staff that for the needful do move application to your good self for the needful and hence the instant appeal that kindly the needful may kindly be done, I will be thankful for this act of kindness.

Yours truly


 Mst Perveen Begum
 D/O Nazir Hussain,
 Junior Instructress
 Women Skill
 Development Centre,
 Zairan Parachinar
 District Kurram

Dated: 08.04.2021



POWER OF ATTORNEY

Ref.# _____

IN THE COURT OF

Cournoel/Honorable

Sesau Tribunal, Pesh

Date: _____

Msi Perveen Begum

(Petitioner)
(Appellant)
(Plaintiff)

Versus

Gori of K.P & others

(Defendant)
(Respondent)

I/We, the undersigned do hereby nominate and appoint

**TAIMUR HAIDER KHAN
ADVOCATE, HIGH COURT**

On behalf of

Appellant

Know all to whom these presents shall come that I/We the undersigned appoint; the above named Advocate in District Peshawar in the above mentioned case to do all the following acts, deeds and things.

1. To act, appear and plead in the above mentioned case in this court or any other court in which same may be tried or heard in the first instance or in appeal or review or revision or application or at any other stage of its progress until its final decision.
2. To present pleadings, appeals, case objection or petitioners for execution, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as shall be deemed necessary or advisable for the prosecution/defence of the said case at all stages.
3. To withdraw or compromise the said case or submit to arbitration any difference or disputes that shall arise touching or any manner relating to said cause.
4. To employee, authorize any other legal practitioner to assist or exercise the power in authority hereby conferred on the advocate whenever he may think to do so.

AND I/We, hereby agree to ratify whatever the advocate or his substitute shall do in this behalf and I/We hereby agree not to hold the advocate or his substitute responsible for the result of the case in consequences of his absence from the Court when the said case is called up for hearing.

AND I/We in case of expiry of the said advocate any full fee or part payment thereof, will not claim in any manner whatsoever, or in case of disengagement of the said advocate will not make any claim regarding fee.

[Handwritten scribble]

TAIMUR HAIDER KHAN
Advocate High Court
Attested

[Signature]
Muhammad Ayaz Sherpao
Advocate High Court
Mob: 0333-9175683

[Signature]
(Signature/thumb impression of the Executant)

needed
M. Ayaz Sherpao
malay...
...

Dated: 12-7-2021
Accepted subject of the terms
And full payment of Settled Fee

Taimur Haider Khan
Advocate, High Court

Msi Perveen Begum Junior
Instruktoran Jawomen Saad
Development Center, Zairan
Paraduna, Dist. Kurrum.