

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**  
**CAMP COURT ABBOTTABAD**

Service Appeal No. 1084/2019

BEFORE:           MRS. ROZINA REHMAN           ...           MEMBER (J)  
                      MISS. FAREEHA PAUL           ...           MEMBER(E)

Zaheer Ahmad S/o Shamraiz, R/o Mohallah Thanda Pani, Village & P.O Beran Gali, Tehsil & District Abbottabad, Ex-Cleaner (C&W) Division Abbottabad.

.... (Appellant)

Versus

1. Secretary (C&W) through Govt. of Khyber Pakhtunkhwa Peshawar.
2. Deputy Director (C&W) Department Abbottabad.
3. Executive Engineer (C&W) Division Abbottabad.
4. Sub Division Officer, Building-II (C&W) Abbottabad.
5. District Accounts Officer Abbottabad.

.... (Respondents)

Mr. Muhammad Liaqat  
Advocate

...

For appellant

Mr. Muhammad Jan  
District Attorney

...

For respondents

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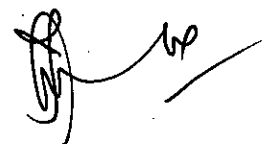
Date of Institution.....23.09.2019

Date of Hearing.....20.09.2022

Date of Decision.....20.09.2022

**JUDGEMENT**

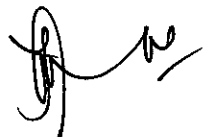
**FAREEHA PAUL MEMBER (E):** The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the impugned order dated 22.02.2019 passed by respondent No. 3 (Executive Engineer (C&W) Division, Abbottabad) whereby the appellant was removed from service on the ground of absence from duty.



2. Brief facts of the case, as per memorandum of appeal, are that the appellant was serving as class-II/Cleaner since 31.07.2006 in the office of Respondent No. 3 Executive Engineer C&W Division, Abbottabad. In February 2015 the appellant fell ill and filed application for medical leave from 05.02.2015 to 06.03.2015. After completion of the said period he moved another application for leave from 06.03.2015 to 06.04.2015. When he was not feeling well, he submitted another application for leave from 07.04.2015 to 07.04.2016 without pay on medical ground. After expiry of the leave period he assumed his duty but Respondent No. 3 did not allow him to attend the office. He visited the office many times but was not allowed attendance in the office. On 26.02.2015 Respondent No. 3 gave absence notice to the appellant after which another absence notice was issued on 08.03.2015. On 27.08.2015 a show cause notice was issued by the respondent. Appellant gave reply to that notice alongwith complete medical record but instead of that, respondent No. 3 issued advertisement in daily Aaj and initiated ex-parte proceedings without giving any opportunity of personal hearing to the appellant. Subsequently order dated 22.02.2019 was passed through which he was removed from service. The order was received by the appellant on 04.03.2019. The respondents, without any suspension order, stopped salary of the appellant w.e.f 29.08.2015. The appellant requested to provide documents/record to him but his request was not honoured. Feeling aggrieved he filed departmental appeal on 22.03.2019 which was not decided in the specific time; hence the service appeal.

3. Respondents were put on notice who submitted written replies/ comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.

4. The learned counsel for the appellant presented the details of the case and contested that neither any inquiry were carried out nor he was given an opportunity of defending himself and was removed from service without fulfilling legal



provisions of E&D Rules. He further added that the appellant was not afforded any opportunity of personal hearing by the competent authority:

5. The learned District Attorney on the other hand argued that the appellant had not submitted any application asking for leave on medical grounds. The three applications provided by the appellant in his appeal were not submitted to the competent authority. Moreover, revised medical rules provide for medical certificate from government hospital with the application and the same was not provided by the appellant. He further contended that last salary was drawn by the appellant in 2015 after which he was absent from duty. He emphasized that it was a case of willful absence from duty and hence liable to be dismissed.


6. Perusal of the record available before us transpires that the appellant absented himself from official duty with effect from February 2015 as is evident from a notice of absence issued on 26.02.2015, through which he was directed to ensure his presence in the office of Building Sub-Division No-II and explain reasons of absence within 15 days. It is assumed that he did not join duty and another notice dated 08.03.2015 was issued with the same directions. After that, a show cause notice issued in Daily Aaj dated 28.08.2015 is available on the file, with the direction to resume his duty within 15 days but after lapse of that period he failed to do so and hence action was taken against him and he was removed from service under Para-9 of E&D Rules 2011 vide order dated 22.02.2019. As stated by the learned District Attorney the appellant drew his last salary in 2015. It was further noted that his absence notice was issued in daily Aaj on 29.08.2015, whereas final order was issued in the year 2019 after lapse of three and a half year. The point before us now is that what took so long in taking action and deciding the case between 2015 and 2019? When confronted, the District Attorney was unable to respond. This Tribunal is therefore, not in a position to ascertain whether the appellant resumed his duty and came and attended the office from 2015 to 2019 or




not? What action was taken by the department after issuance of show cause notice in the newspaper on 29.08.2015? What prevented the department in taking action against him after issuing show cause notice?

7. In view of the above, the instant appeal is partially accepted and the appellant stands reinstated in service for the purpose of denovo inquiry, to be completed within 90 days of the receipt of copy of this judgment, in view of discussion in the preceding paras. Needless to mention that the appellant be given proper opportunity of defence. Parties are left to bear their own costs. Consign.

8. *Pronounced in open court in Abbotabad and given under our hands and seal of the Tribunal on this 20<sup>th</sup> day of September, 2022.*

  
(ROZINA REHMAN)  
Member (J)  
(Camp Court, A/Abad)

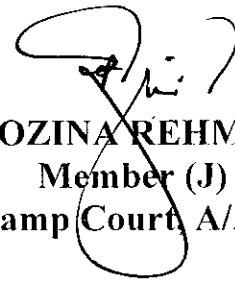
  
(FAREEHA PAUL)  
Member (E)  
(Camp Court, A/Abad)

**Service Appeal No. 1084/2019**

Mr. Muhammad Liaqat Advocate for appellant present. Mr. Muhammad Jan, District Attorney for respondents present. Arguments heard and record perused.

2. Vide our detailed judgement containing 04 pages, the instant appeal is partially accepted and the appellant stands reinstated in service for the purpose of denovo inquiry, to be completed within 90 days of the receipt of copy of the judgment. ~~in view of discussion in the preceding para.~~ Needless to mention that the appellant be given proper opportunity of defence. Parties are left to bear their own costs. Consign.

3. *Pronounced in open court in Abbotabad and given under our hands and seal of the Tribunal on this 20<sup>th</sup> day of September, 2022.*



**(ROZINA REHMAN)**  
**Member (J)**  
**(Camp Court, A/Abad)**



**(FAREEHA PAUL)**  
**Member (E)**  
**(Camp Court, A/Abad)**

19<sup>th</sup> July 2022

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney for respondents present.

Appellant seeks adjournment on the ground that his counsel is not available today. Last opportunity granted for arguments. To come up for arguments on 20.09.2022 before D.B at camp court Abbottabad.



(Salah Ud Din)  
Member (Judicial)



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

17.03.2022


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


  
Reader

18.05.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan, Assistant Advocate General for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned but as a last chance. To come up for arguments before D.B on 15.06.2022 at camp court Abbottabad.

  
(Fareeha Paul)  
Member(E)


  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad


15.06.2022

Nemo for appellant.

Noor Zaman Khan Khattak, learned District Attorney alongwith Muhammad Shafiq Litigation Assistant for respondents present.

Notice be issued to appellant/counsel for 19.07.2022 for arguments before D.B at Camp Court, Abbottabad.

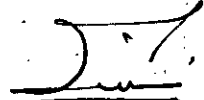
  
(Fareeha Paul)  
Member (E)  
Camp Court, A/Abad

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

20.09.2021

Nemo for the appellant. Mr. Usman Ghani, District Attorney for the respondents present and requested for adjournment for submission of reply/comments. Request is accorded with the directions to respondents to furnish reply/comments within 10 days. In case the respondents failed to submit reply/comments within stipulated time from today, they shall have to seek extension of time through written application citing sufficient reasons. Otherwise, their right for submission of reply/comments shall stand ceased. To come up for arguments before the D.B on 21.12.2021 at Camp Court Abbottabad.

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

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

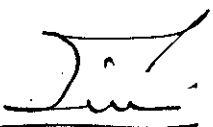
21.12.2021

Nemo for the appellant. Mr. Zahid Amin, SDO for respondents No. 1 to 4 alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Para-wise comments on behalf of respondents No. 1 to 4 submitted, which are placed on file.

Respondent No. 5 has failed to submit his written reply/comments today, therefore, his right for submission of written reply/comments stands ceased in light of order dated 20.09.2021. Adjourned. To come up for rejoinder, if any, as well as arguments on 17.03.2022 before the D.B at Camp Court Abbottabad.

Notice for prosecution of the appeal be also issued to the appellant for the date fixed.

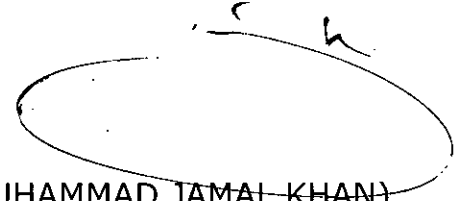
  
(Salah-ud-Din)  
Member (J)  
Camp Court A/Abad



16.11.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned District Attorney seeks time to furnish written reply/comments. He is directed to contact the respondents for submission of written reply/comments. File to come up for written reply/comments on 20.01.2021 before S.B at Camp Court, Abbottabad.



(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

20.1.2021

Due to covid-19, The case is adjourned to 20/8/21 for the same.



Reader

22.01.2020

Appellant in person present. Written reply not submitted. Shafique S.C representative of the respondent department absent. Respondents as well as absent representative of the respondents be put to notice fore reply. Adjourn. To come up for written reply/comments on 19.02.2020 before S.B at Camp Court Abbottabad.



Member  
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /  
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on 1/4  
9 / 20 at camp court abbottabad.



Reader

14.09.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney is also present. Neither written reply on behalf of respondents submitted nor anyone on their behalf is present; therefore, notices be issued to them for submission of written reply/comments. File to come up for written reply/comments on 16.11.2020 before S.B at Camp Court, Abbottabad.



(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

25.10.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Ex-Cleaner C&W Division) has filed the present service appeal against the order dated 22.02.2019 whereby he was removed from service under Para/Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

Points urged consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 18.12.2019 before S.B at Camp Court, Abbottabad.

Appellant Deposited  
Security Process Fee

05/11/19

Member  
Camp Court, A/Abad

18.12.2019

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Shafique, Clerk for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further time to file written reply. Adjourned to 22.01.2020 for written reply/comments before S.B at Camp Court Abbottabad.


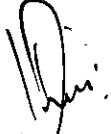
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1084/2019 \_\_\_\_\_


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/08/2019	<p>The appeal of Mr. Zaheer Ahmad resubmitted today by Mr. Muhammad Liaqat 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 23/8/19                 </p>
2-	30-8-19	<p>This case is entrusted to touring S. Bench A.Abad for preliminary hearing to be put up there on <u>25-10-2019</u></p> <p style="text-align: right;">                       CHAIRMAN                 </p>

The appeal of Mr. Zaheer Ahmed received to-day i.e. on 23-07-2019 is incomplete on the following score, which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ ① Law/section under which appeal is filled is not mentioned in memo of appeal.
- ✓ ② Annexures of appeal may be properly flagged.
- ✓ ③ Annexures of appeal should be attested.
- ✓ ④ Memo of appeal should be signed by appellant.
- ✓ ⑤ Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1267 /S.T,

Dt. 26-7- /2019.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muhammad Liaqat.  
Adv, Abbottabad.

In objection order no 1267/ST dated 26/7/2019  
Serial no 1 to 5 in circule complied with  
by the counsel of petitioner

  
21/08/2019

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

- Appeal No. 1084 /2019

Zaheer Ahmad son of Shamraz, resident of Mohallah Thanda Pani, Village & P.O Beran Gali, Tehsil & District Abbottabad, Ex-Cleaner (C&D) Division, Abbottabad.

...APPELLANT

**VERSUS**

Secretary (S&W) through Govt. of Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

**SERVICE APPEAL**


**INDEX**

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2.	Copy of appointment order No.1496 dated 31/07/2016 and service book of the appellatant	10 to 15	"A" & "B"
3.	Copy of the applications and medical record	16 to 40	"C" to "G"
4.	Copy of the notices and advertisement	41 to 44	"H" & "K"
5.	Copy of order No.376/158-E dated 22/02/2019	45	"L"
6.	Copies of application, complaint, notices and register receipts	46 to 54	"M" to "Q"
7.	Copy of appeal	55 to 59	"R"
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*Zaheer*  
...APPELLANT

Through

Dated: 22/07 /2019

  
(MUHAMMAD LIAQAT)  
Advocate High Court, Abbottabad

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

Appeal No. 1084 /2019

Zaheer Ahmad son of Shamraz, resident of Mohallah Thanda Pani, Village & P.O Beran Gali, Tehsil & District Abbottabad, Ex-Cleaner (C&D) Division, Abbottabad.

...APPELLANT

Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 1031

Dated 23/7/2019

1. Secretary (S&W) through Govt. of Khyber Pakhtunkhwa, Peshawar.
2. Deputy Director (S&W) Department, Abbottabad.
3. Executive Engineer (C&W) Division, Abbottabad.
4. Sub Division Officer, Building-II (C&W), Abbottabad.
5. District Accounts Officer, Abbottabad.

...RESPONDENTS

**SERVICE APPEAL** UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, SOLICITING SET-ASIDE DISMISSAL ORDER NO.376/158-E DATED 22/02/2019 PASSED BY THE RESPONDENT NO.3 ON THE BASIS OF FAKE AND FABRICATED ABSENT PERIOD 05/02/2015 TO 07/04/2016 in lieu of leave WHEREBY VIOLATING SECTION 9 (E & ND) RULES, 2011, ORDER DATED 22/02/2019, REINSTATED PETITIONER ALONGWITH BACK BENEFITS.

Filed to-day

Registrar  
23/7/19

Re-submitted to-day  
and filed.

Registrar  
23/8/19

**PRAYER:** ON ACCEPTANCE OF INSTANT APPEAL THE IMPUGNED ORDER DATED 22/02/2019 MAY KINDLY BE SET-ASIDE AND ABSENT PERIOD MAY KINDLY BE TREATED AS MEDICAL LEAVE WITH PAY AND WITHOUT PAY RESPECTIVELY AND PETITIONER MAY KINDLY BE REINSTATED ALONGWITH ALL BACK BENEFITS THROUGHOUT OF PETITIONER FROM DUE DATE MAY KINDLY BE ISSUED SALARY/ ARREAR AND ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER UNDER THE GIVING CIRCUMSTANCES OF THE CASE MAY PLEASE BE GRANTED TO THE APPELLANT.

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Respectfully Sheweth;-

May it please your lordship the brief fact of the instant appeal are as under:-

1. That petitioner was serving as class-II/ Cleaner since 31/072006 to up till now in the department of respondent No.3. Copy of appointment order No.1496 dated 31/07/2016 and service book of the appellant are attached as Annexure "A" & "B".



2. That in Feb, 2015 appellant fell ill, on the advice of Medical Officer, through MLC appellant filed an application for medical leave on 05/02/2015 to 06/03/2015 after the completion of said period appellant moved another application on 06/03/2015 to 06/04/2015. When petitioner not feel well thereafter another application submitted by the appellant on 07/04/2015 to 07/04/2016 without pay on the medical ground. Copy of the applications and medical record are attached as Annexure "C" to "G".
3. That respondents verbally told the petitioner that your application on respect of medical leave have been sanctioned by the department.
4. That after the expiry of leave absent period appellant assumed his duty but respondent No.3 did not assumed his attendance. Appellant severally visit the office of the respondent No.3 but respondent No.3 did not allow to appellant for attendance.
5. That on 26/02/2015 vide letter No.1584/163-E respondent No.3 give absence notice to the

appellant and thereafter another absent notice was issued to appellant on 08/03/2015 vide letter No.3107-163-E and on 27/08/2015 give show cause notice absent from duty by the respondents. Appellant give reply of the show cause notice alongwith complete medical record to the respondent No.3, while ill condition was in the knowledge of respondent No.3, respondent No.3 malafidely give advertisement in daily Aaj. Copy of the notices and advertisement are annexed as Annexure "H" to "K".

6. That the respondents willfully victimize the petitioner/ appellant and treated absent period in lieu of medical leave, and thereafter initiated proceeding ex-party without giving opportunity of personal hearing and violation of under Section 9 of (E & ND) Rule 2011, in consequences upon respondents issue termination order against the petitioner vide order No.376/158-E dated 22/02/2019 which was received appellant on 04/03/2019. Copy of order No.376/158-E dated 22/02/2019 is annexed herewith as Annexure "L".

7. That respondents without any suspension order stopped appellant's salary from 29/08/2015, illegally, while appellant resumed his duty after the good health, in this respect appellant submitted various applications for releasing his salary/ arrears but respondents did not give any consideration with due course of law.
8. That if appellant absent from duty on 26/02/2015 and give advertisement in "daily Aaj" on 29/08/2015 after lapse of 4 years terminated appellant on 22/02/2019 why respondent had not proceed against the appellant within 4 years there are no excuse and reason in respect of void order of termination on the part of respondents.
9. That on the request of appellant, respondent did not provide single document/ record to appellant even then appellant file application under Right to Information Act 2015 on 11/03/2019 but respondent No.3 did not respond to appellant, thereafter the appellant filed a compliant before the proper forum against the respondents. Copies of application, complaint, notices and register receipts are attached as Annexure "M" to "Q".

10. That being aggrieved from the order of respondents, appellant filed a departmental appeal on 22/03/2019 but the respondent did not decide departmental appeal with the specified time, so that after laps of that period, impugned order dated 22/03/2019 passed by the respondent No. 3 presumed to the final order and thereafter under section 4 KPK Service Tribunal Act, service appeal is maintainable. Copy of appeal is attached as Annexure "R".
11. That appellant have no other remedy except present appeal before this Honourable Tribunal, inter-alia on the following grounds:-

**GROUND:-**

- a. That the impugned order dated 22/02/2019 against the law and facts hence, liable to be set-aside.
- b. That no inquiry proceedings are carried out by the inquiry officer in accordance with law and justice and rules but all the proceedings are done in the absence of the appellant and the impugned order is passed by respondent No.3 to cover his own

malafide action as well as the faults of his own office officials in utter disregard of the law on the subject, thus the impugned order is unsustainable in the eye of law and are liable to be set-aside.

- c. That the respondent No.3 willfully show absent period rather than medical leave with pay and without pay and thus committed high inefficiency and lack of interest in his official duties (as matter of right, therefore, legal action should be taken against the said respondent under the relevant law and void order may kindly be set-aside and appellant may kindly be reinstated alongwith all back benefit.
- d. That the respondent No.3 before passing the impugned order did not afforded an opportunity even did not consider the record which is already been given to the respondents. Thus the impugned order being violation of law as well as the natural justice is liable to be set-aside and appellant is entitled to the re-instated on service alongwith all back benefit alongwith salary.

- e. That during the entire period of service no complaint of any kind against the appellant having sole supporter of his family, therefore, the impugned order may kindly be set-aside alongwith back benefits.

It is, therefore, humbly prayed that on acceptance of instant appeal the impugned order dated 22/02/2019 may kindly be set-aside and period of absent may kindly be treated as medical leave with pay and appellant may kindly be reinstated alongwith all back benefits and salary/ arrear of appellant throughout from the due date may kindly be issued and any other relief which this Honourable Tribunal may deems fit and proper under the giving circumstances of the case may please be granted to the appellant.

*Zohery*  
...APPELLANT

Through

Dated: 22/07/2019

*Muhammad Liaquat*  
(MUHAMMAD LIAQAT)  
Advocate High Court, Abbottabad

**VERIFICATION:-**

*Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.*

*Zohery*  
...APPELLANT

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

Appeal No. \_\_\_\_\_/2019

Zaheer Ahmad son of Shamraz, resident of Mohallah Thanda Pani, Village & P.O Beran Gali, Tehsil & District Abbottabad, Ex-Cleaner (C&D) Division, Abbottabad.

**...APPELLANT**

**VERSUS**

Secretary (S&W) through Govt. of Khyber Pakhtunkhwa, Peshawar & others.

**...RESPONDENTS**

**SERVICE APPEAL**

**AFFIDAVIT**

I, Zaheer Ahmad son of Shamraz, resident of Mohallah Thanda Pani, Village & P.O Beran Gali, Tehsil & District Abbottabad, Ex-Cleaner (C&D) Division, Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Service Tribunal.



*Zaheer*  
**DEPONENT**

Annex "A"

OFFICE OF THE  
EXECUTIVE DISTRICT OFFICER  
WORKS & SERVICES DEPTT:  
ABBOTTABAD.

OFFICE ORDER No. 1986/15-E (A)

Dated, 31/07/2006.

OFFICER ORDER.

Mr. Zaheer Ahmed S/O Muhammad Shamraiz, Mohallah Thanda Pani village and P.O Beerangali Abbottabad is hereby appointed as Cleaner (BPS-2) with usual allowances as admissible under the Rules.

2. He shall join duty at his own expenses.
3. He shall be governed by such Rules and orders relating to leave, traveling allowances and medical facilities etc. as have or may therefore be prescribed by the Government and made applicable to the Government Servants.
4. He shall produce Medical Certificate from DHQ Hospital, Abbottabad.
5. If he accepts the post on the afore-said condition, he reports himself for duty to the Deputy Director (B&R) & Services Department Abbottabad as early as possible but not later than 31/7/2006.

EXECUTIVE DISTRICT OFFICER

Copies to the:-

1. Deputy Director (B&R) Works & Services Deptt: Abbottabad for information and necessary action.
2. District Accounts Officer, Abbottabad.
3. Mr. Zaheer Ahmed S/O Muhammad Shamraiz, Mohallah Thanda Pani village and P.O Beerangali Abbottabad.

Attested  
Muhammad Liaqat

EXECUTIVE DISTRICT OFFICER



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: Zahoor Ahmed (U) (2)

2. Race: Komal Annex B

3. Residence: Mohallah Thanda Jami Village P.O. Biringat  
Jeh. District Abbottabad



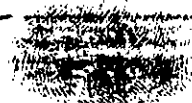
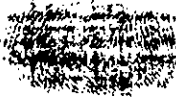

4. Father's name and residence: Mohammad Shamsi

5. Date of birth by Christian era as nearly as can be ascertained: 03-03-1982

6. Exact height by measurement: 5-6

7. Personal marks for identification: A scar on Rt. wrist

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: Zahoor Attested: Muhammad Liaqat

10. Signature and Designation of the Head of the Office, or other attesting Officer.  
[Signature]  
DEPUTY DIRECTOR (B&R)  
WORKS & SERVICES DEPTT.  
ABBOTTABAD

Name of Post	Whether substantive or officiating and whether Permanent or temporary	If Officiating state (i) Substantive appointment, or (ii) Whether for pension under Art. 373 U.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Governor
Cleaner B-2. (2200-75-4450)			A-22007			31-7-06	

2615-100-5615 (BPS-3)

2615-PM

13/2007

do

2715-PM

12

(12) (B)

Signature and position of the head of office or other authority in possession 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	Allocation of period of leave on emergency upto four months for which leave salary is debitable to another Government	Signature of the attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period	Government to which debitable	
				Appointed as class B-02			
				vide EDO (W+S) Deptt. order			
				Reference to circular No: 1496/SE(A) dt. 31/7/06.			
				(CA. No. 3) / Deputy Director (W+S) Works & Services Deptt. Abbottabad			
				(CA. No. 3) / Deputy Director (W+S) Works & Services Deptt. Abbottabad			
				S-77 / 518/06 / 11/10/06 due to newly apptd on 8/10/06 to 30/06			
				also pay 1/10/06 hiring up 1/10/06			
				Attested			
				[Signature]			
				Pay fixed Revised Pay scales as introduced vide Govt. Of NWFP Finance Deptt. letter No FD(PRC)1-1-2007 dated 20-7-2007 scale No 03 (Scale 2615-10-5607) @ Rs. 2057/- 1-7-2007.			
				[Signature] / Deputy Director (W+S) Works & Services Deptt. Abbottabad			
				Service For The Period From 1-7-2006 to 30-1-2007 Verified from the office copies of the pay Bill			
				ANNUAL INCREMENT GRANTED			
				[Signature] / Deputy Director (W+S) Works & Services Deptt. Abbottabad			
				[Signature] / Deputy Director (W+S) Works & Services Deptt. Abbottabad			

Name of Post	Whether substantive or officiating and Permanent or temporary	Any substantive pay increment or other benefit for pension under Art. 371 of C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other allowances falling under this term. Pay	Date of Appointment	Government
3140-120-5740 Cleaner BPS-3			3260/- PM			17 2008	
			3380/-			12 2008	
BPS-03 (2615-100-5615)			Revised pay scale with effect from 9-2-2007			1-7-2007 2615/-	
						1-9-2007 2715/-	
BPS-03 (3140-120-5740)						1-12-2007 2815/-	
						1-7-2008 3080/-	
						1-9-2008 3500/-	
						1-12-2009 3620/-	
A.			R 3740 PM	11 Sub I	Assistant Director Work		

Signature and position of the head of office or other appointing officer in Columns 7 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 appointing 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 appointing officer	Reference to an recorded punishment or censure, or revocation or praise of the Government Serv
--	------------------------------------	--	---	------------------------------------	---	---	--

Pay fixed in Revised Pay Scale No. 3 introduced vide Finance Dept. NWSR Peshawar No. ED(PAC) 11/2008 dt: 10-7-2008

Assistant Director  
No 11

30-11-2008  
Granted Annual increment

190  
\$ 511  
pay actualisation on 1-8-09 @ Rs. 3500/PM Ad for 25/10/2008 Rs. 2990/-

Assistant Director  
Work & Services

AH estee

110093

ANNUAL INCREMENT GRANTED

Service for the period From 1-12-08 to 30-11-09 Verified from the office copies of the Pay Bill

30-11-10

110093

Sub-Divisional Officer (Read II) Govt. Department Abbottabad

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 Whether subordinate or non-subordinate and whether service counts for pension under Art. 37(1) C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government
(3)				6050/-		1/2	2011
5050-200-11050							
11-1/-				6250/-		1/2	2012
				6450/-		1/2	2012
				6650/-		1/2	2013

Signature and Name of the head of the office or other attesting officer in Form 1 to 8	10 Date of termination of appointment	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 duration 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
		Pay fixed Revised Pay scale as introduced vide Govt. of K.P.K. Finance Deptt letter No FD(PRC) 1-1/2011 dated 13.7.2011 and pay fixed in basic pay scale No @Rs 6050/- 1-7-2011						
			Sub Divisional Officer. (Building-II) C & W Deptt. Abbottabad.					
	12 3- 2011				\$ 84 10/12	Pay active w.e.f 1-12-2012 Endg. w.e.f 9/2011 to 11/2012 @Rs = 6050/- + = 6250/-		
	12 30- 2012	INCREMENT GRANTED				Service for the Period From 1-12-2011 to 31-12-2012 verified from the office copies of the pay bills		
			Sub Divisional Officer (Building-II) C & W Deptt. Abbottabad.			Sub Divisional Officer (Building-II) C & W Deptt. Abbottabad.		
	12 30- 2013	Annual Increment Granted	Muhammad Ali Hashmi			Service for the Period From 1-12-2012 to 31-12-2013 verified from the office copies of the pay bills		
			Sub Divisional Officer (Building-II) C & W Deptt. Abbottabad.			Sub Divisional Officer (Building-II) C & W Deptt. Abbottabad.		





Name of the head or other officer in terms 1 to 5	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	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 award or praise of the Government Service
					Period	Government to which debitable		
30/6/2014			Granted one week leave Govt of KP. No FD (50-1) 2-123/2014 dated 14/7/2014	Pro-mature leave			(15) 1-2014	Pay fixed @ 650/-
30/11/2014	Annual increment granted							Service for the period from 2-12-2013 to 30-11-2014. Verified from the office copies of the Pay List
			Sub Divisional Officer C&W Division Building-II Abbottabad				Sub Divisional Officer C&W Division Building-II Abbottabad	
								The officer has been terminated/removed from service w.e.f 26-2-2015. While Executive Engineer - C&W Division Abbottabad o/o no, 376/158 E dated 22-2-15.
			Attested Muhammad Liaqat Advocate				Executive Engineer C&W Division Abbottabad	

محرفیت جناب سب ڈیوٹی نکل آفیسر س ع ا ایٹ آباد

Annex "C"

درخواست لبرائے چھٹی بوجہ بیماری مسائل

جناب عالی درخواست ذیل گزارش ہے۔

یہ کہ مسائل س ع ا کا ملازم ہے بحیثیت کلینر مآ کرتا ہے

اور مسائل بہت سخت بیمار ہے جسکی وجہ سے

مسائل ڈیوٹی پر حاضر نہ ہو سکتا ہے۔ جس بنا پر

مسائل کو ایک ماہ کی چھٹی عنایت فرمائی جاوے

مسائل فائبریکل ریکارڈ شامل ہے۔

آپکی عین نوازش ہوگی

Attested  
Muhammad Liaqat  
Liaqat

الحاضر 2015-02-05

ظہیر احمد ولد محمد شکرین کلینر س ع ا ایٹ آباد  
Zaher

محرف سے جواب سے ڈیپارٹمنٹل آفیسر C.E.W ایٹ ایب آباد

Annex "D"

درخواست کے لئے پہلی بوجہ بیماری مسائل

جناب عالی درخواست سے ذیل گزارش ہے

یہ کہ مسائل C.E.W کا ملازم ہے۔ مسائل C.E.W میں کلینر کا کام کرتا ہے مسائل بہت سخت بیماری ہے جسکی وجہ سے مسائل ڈیپارٹمنٹ پر حاضر نہ ہو سکتا ہے جس بنا پر مسائل کو ایک ماہ کی چھٹی عذابت فراہمی جاوے مسائل کا عیدیکل ریکارڈ درخواست کے ساتھ شامل ہے

Attest,  
Muhammad Liaqat  
Advocate

ایپلی عین گزارش ہوگی

العارض 06-03-2015

ظہیر احمد ولد محمد شکر نگر کلینر C.E.W ایٹ ایب آباد  
Zahoor

محروف جناب سب ڈویژنل آفیسر ساع C ایسٹ آباد

Annex "E"

درخواست برائے ٹیچٹی بوجہ بیماری سائل

جناب عالی درخواست ذیل گزارش ہے

سائل ساع C کا علاج ہے اور سائل ساع C میں کلینر کا کام ہے سائل بہت سخت بیمار ہے جس کی وجہ سے سائل ڈیویژن پر حاضر ہونے سے قاصر ہے لہذا میری فرمائش ہے کہ سائل کو ایک مہینے کی ٹیچٹی عنایت فرمائی جاوے سائل کا میڈیکل ریکارڈ درخواست کے ساتھ شامل ہے۔

آپ کی عین گزارش ہوگی

Attested by  
Muhammad Liaqat  
Advocate

الحارصہ 4/06/15

ظہیر احمد ولد محمد شکرین کلینر ساع C ایسٹ آباد

Zaheer



# HAMED LABORATORY

19

Annex "F"

Consultant Pathologist: Prof. Dr. Mrs. Farhat Rizvi, MBBS (Pesh), M.Phil (Punjab), DCP (London), Diploma in Immunology (London)

Doctors Plaza, Opp: Ayub Hospital Complex, Mansehra Road, Abbottabad. Ph: (0992) 381391  
Shafique Medical Centre, Mandian, Abbottabad. Ph: (0992) 383268 Fax: (0992) 384422  
Opposite D.H.Q Hospital, Link Road, Abbottabad, Ph: (0992) 343409  
Collection Point Dak Khana Road-Havelian Ph: (0992) 811312

Patient no:  
**9755/15 / 1**

---

Lab no:  
**80/28 - Mar**

Name : **ZAHEER AHMED**

Age/Gender: **\*\* / M**

Report Origin:

Date: **28-March-2015**

Time  
**3:38 pm**

---

Today  
**Saturday**

Test	Result
------	--------

### TYPHI DOT

Typhi Dot IgM  
Typhi Dot IgG

**NEGATIVE**  
**NEGATIVE**

*AHmed*  
**Muhammad Liaqat**  
Advocate

*[Signature]*  
**Prof. Dr. Farhat Rizvi**  
Pathologist

All routine tests done by SELECTRA (Merck Germany) fully automated Chemistry Analyzer.

- Thyroid
- Fertility
- Tumour markers
- Viral Serology
- Drugs
- Allergy

All hormones done by VIDAS (Biomérieux) fully automated Chemistry Analyzer.



**AYUB TEACHING HOSPITAL**  
**ABBOTTABAD**  
Filter Out Patient Department



Book No. 2587

S. No. 097

Patient Name: Zabeer Ahmad	Patient ID: 28 Year	Male
Patient Sex: Evening OPD	Patient Yearly No: Abbottabad	
Patient Age: 42940	Patient Date & Time: 07/10/2011 03:45:59 PM	
Address: Patient Status :- Routine	Printed by: Mr. Naveed	Rs:- 10
Amount:	Computer Operator:	

Adho  
 Typhoid  
 19/10/11

✓ Long Decadron  
 ✓ 1000 Brevin  
 12/10/11, 20mg  
 ✓

Only Computerized Slip will be Accepted

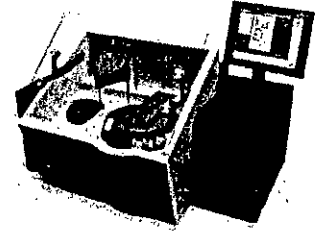
✓ 1000 Protelid  
 12/10/11 20mg  
 ✓

Attested  
 Muhammad/Liaqat  
 Facate



# Al-Khair Test Lab

Committed to Excel in Quality



Fully automated & Computerized

## Center of excellence for diagnosis of diseases

Incorrect result ? Contact: 0992-517580 / 0333-6404774 For a Single repeat test within 24 hours.

Name: ZAHIR Sex: M Age: \*\* Years  
Referred By: SELF Date: 26/04/2015 Time: 11:14:20  
Investigation Req'd: Liver Function Tests No. 7317

### TEST REPORT

Serum Bilirubin (Total) ----- 0.6 mg/dl

(Ref: Range ..... Upto 1.0)

Alkaline Phosphatase ----- 190 U/L

(Ref: Range ... Adult 98-279  
Children 245-760)

SGPT (ALT) ----- 28 U/L

(Ref: Range .. Males:Upto 40  
Females:Upto 32)

*Muhammad Liaqat*  
**Muhammad Liaqat**  
Advocate

Malik Yasir ur Rehman  
Director

Dr. Mazhar Malik  
Pathologist

M. Atif Malik  
Microbiologist

Malik Asim Ali

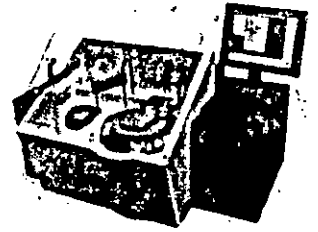
MS (Biotechnology) COMSATS U.T. Abbottabad  
BS (Hons) Microbiology Hazara University

Lab Technologist



# Al-Khair Test Lab

Committed to Excel in Quality



Fully automated & Computerized

**Center of excellence for diagnosis of disease**

Incorrect result ? Contact: 0992-517580 / 0333-6404774 For a Single repeat test

Name: ZAHIR

Sex: M

Referred By: SELF

Date: 26/04/2015

Investigation Req'd: Blood for CP

## TEST REPORT

TEST	RESULT	REF.
Hb	14.4 g/dl	M. 14 F. 12
RBC	4.79 million/cmm	04-11
TLC	7,100 /cmm	4000-11000
DLC:		
Neutrophils	61 %	40-70
Lymphocytes	35 %	20-40
Eosinophils	03 %	01-05
Monocytes	01 %	02-08
Basophils	00 %	00-02
Abnormal Cells	**	
Immature Cells	**	
Platelets	215,000 /cmm	150,000-400,000

*Attested*

*Muhammad Liaqat*  
Advocate

Malik Yasir ur Rehman Director  
 Dr. Mazhar Malik Pathologist  
 M. Atif Malik Microbiologist  
 Malik Asim Ali MS (Biotechnology) COMSATS, Islamabad Abbottabad  
 BS (Hons) Microbiology Hazara University  
 Lab Technologist

Address: Opp. AMC Abbottabad Hello : 0992-517580 e-mail: alkhair\_testlab@hotmail.com





# Al-Khair Test Lab

Committed to Excel in Quality



Fully automated & Computerized

93

**Center of excellence for diagnosis of diseases**

Incorrect result ? Contact: 0992-517580 / 0333-6404774 For a Single repeat test within 24 hours.

Name: ZAHIR	Sex: M	Age: *** Years
Referred By: SELF	Date: 26/04/2015	Time: 11:17:20
Investigation Req'd: TYPHOID Ab TEST	No.	2257

## TEST REPORT

TEST	RESULT
S.TYPHI (IgM).....	NEGATIVE
S.TYPHI (IgG).....	NEGATIVE

### INTERPRETAION

IgM Positive: Acute Typhoid Fever Early Stage  
 IgM & IgG Positive: Acute Typhoid Fever  
 IgG Positive: Tphoid Fever Previous Infection  
 Or Vaccination.

Attested  
  
 Muhammad Liaqat  
 Advocate

Malik Yasir ur Rehman Director	Dr. Mazhar Malik Pathologist	M. Atif Malik Microbiologist	Malik Asim Ali MS (Biotechnology) COMSATS, Abbottabad BS (Hons) Microbiology Hazara University	Lab Technologists
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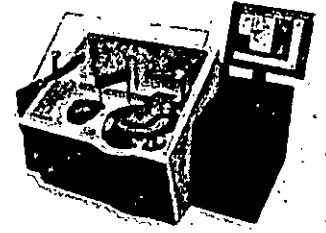
Address: Ground Floor, Doctor Plaza, Opp AMC Abbottabad Hello : 0992-517580 e-mail:alkhair\_testlab@hotmail.com



# Al-Khair Test Lab

24

Committed to Excel In Quality



Fully automated & Computerized

## Center of excellence for diagnosis of diseases

Incorrect result ? Contact: 0992-517580 / 0333-6404774 For a Single repeat test within 24 hours.

Name: ZAHIR	Sex: M	Age: ** Years
Referred By:	Date: 27/04/2015	Time: 14:29:21
Investigation Req'd: Urine RE	No. 26255	

### PHYSICAL EXAMINATION

Quantity ----- 20 ml  
 Colour ----- PALE YELLOW  
 pH ----- 5.0  
 Specific gravity ----- 1.020

### CHEMICAL EXAMINATION

Albumin ----- NIL  
 Sugar ----- NIL

### MICROSCOPY

RBCs ----- NIL /HPF  
 Pus Cells ----- 02---03 /HPF  
 Epithelial Cells ----- A FEW /HPF  
 Casts ----- NOT SEEN  
 Others ----- NIL

Attested

  
 Muhammad Liaqat  
 Advocate

Dr. Haider Zaman  
M.B.B.S., F.C.P.S (Medicine)

25

ڈاکٹر حیدر زمان

ایم بی بی ایس، ایف سی پی ایس (میڈیسن)

میڈیکل سپیشلسٹ

ایوب ہسپتال کمپلیکس ایبٹ آباد

کلینک ڈاکٹر زمان بازار با تقابل ایوب ہسپتال کمپلیکس ایبٹ آباد

Medical Specialist

Ayub Hospital Complex, Abbottabad.

Clinic: Doctor Plaza Opposite

Ayub Hospital Complex Abbottabad.



Pt's Name Zabeer Address Abbottabad Age 3y Date 08/6/2015

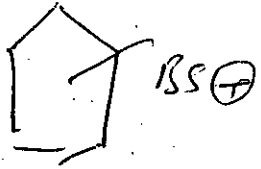
Jener e chils

2 week

Rx

Low spigester  
radiating to  
back

Sleep ←  
Appetite ←



① Tab. Trichogen 200p  
15 (1+1)

② Tab. leflex 200p  
15 (1+1)

③ Tab. Calpol  
15 (1+1+1)

④ STP. Digex NP  
15 (1+1)  
15 (2+2+2)

Tab. Calpol 15

(15)

Attested

Muhammad Liaqat  
Associate

Dr. Haider Zaman  
M.B.B.S., F.C.P.S (Medicine)

# MUFTI CLINIC

CITY ULTRASOUND INSTITUTE

RURAL MEDICAL RESEARCH WELFARE AND TRAINING CENTRE



RURAL MEDICAL RESEARCH WELFARE AND TRAINING CENTRE



## DR. M. FAZEEL-UZ-ZAMAN

MBBS, MRCP, MCPS (Family Medicine), DHMS  
Fellow TID Ultrasound, MUSP  
Professional Diploma Diagnostic Ultrasound MUST  
Specialist in Ultrasound & Family Medicine  
Interventional Ultrasonologist

Abbottabad: Doctor Colony Near Ayubi Medical Complex  
& INOR Cancer Hospital Opp. Modern School  
Ph: 0992-380101 Cell: 0334-8973684

Khalabat Township: Sector 4, Near Police Station  
Ph: 0995-619307 Cell: 0334-8953342, 0334-8953378

DATE: 11/6/15

Email: mufti.clinic@gmail.com

Name: Zahed Age: \_\_\_\_\_ Years Male / Female Referred by: \_\_\_\_\_

Indications: \_\_\_\_\_ Date: \_\_\_/\_\_\_/\_\_\_

### ULTRASOUND REPORT

<p><b>Liver:</b> Size is normal.</p> <p>Texture is normal. <i>fatty</i></p> <p>Contour is normal.</p>	<p>No focal defects such as mass, cyst or abscess.</p> <p>Intra-hepatic bile ducts are not dilated.</p>
---	---

Right & Left Diaphragmatic excursions are normal.

**Common bile Duct (CBD):** is not dilated (diameter 3 mm \_\_\_\_\_)

<p><b>Gallbladder:</b> Size is normal.</p> <p>Wall thickness is normal.</p> <p>Ultrasound guided palpation over the gallbladder is not tender.</p>	<p>No sludge in the lumen.</p> <p>No calculi in the lumen.</p>
--	--

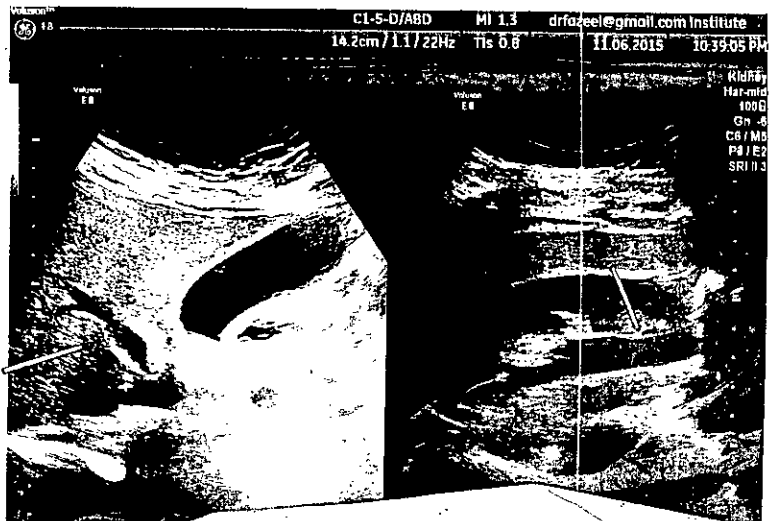
**Vessels:** Inferior vena cava, hepatic veins, portal vein and aorta are of normal diameters and appearances.

<p><b>Spleen:</b> Size is normal. _____ cm</p>	<p>Parenchymal texture is normal. No focal defects.</p>
--	---

**Pancreas:** Size is normal. Texture is normal. No

<p><b>Right Kidney:</b> Size is normal.</p> <p>Position is normal. No focal defects.</p> <p>Parenchymal texture is normal.</p> <p>Parenchymal thickness is normal.</p>
--

*Ahmed*  
*Muhammad Ali Haqat*  
Advocate



Col. Dr.

**Muhammad Zafar Ali**

FCPS, MRCP (UK), MRCP (Ireland),  
FRCP (Edin), FRCP (Dublin), FRCP (London)  
SCE Gastro (Federation of Royal College of Physicians (UK))  
Classified Medical Specialist  
and Gastroenterologist  
CMH Rawalpindi.  
For Appointment: 0345-5098753

ناغہ بروز ہفتہ، اتوار

Pt's Name:

Zaher Akbar

Age:

Date:

0345-5098753

15/15/15

Clinical Notes

Endoscopy

- Cap F8ken 40

1-1

- T Zandac 300

1-1

- Sp ULSANIC

1-1

1-1

Attested

Muhammad Liaqat  
Advocate

28

# G I ENDOSCOPY DEPARTMENT CMH RAWALPINDI

## UPPER GI ENDOSCOPY REPORT

Date 10/6/15 Report No. \_\_\_\_\_

Name: Zaher Ahmad Age \_\_\_\_\_ Yrs

Clinical Diagnosis ADP Ba Studies \_\_\_\_\_

Instrument: OL. GIF 100 / XQ30 / XQ20 / Panatax Video / Other

Premedication: Valium I/V \_\_\_\_\_ mg / Dormicum I/V 2 mg

Esophagus \_\_\_\_\_  
Mild Antral gastr

\_\_\_\_\_ Biopsy \_\_\_\_\_

GE Junction \_\_\_\_\_ cm \_\_\_\_\_

Stomach \_\_\_\_\_

\_\_\_\_\_ Biopsy \_\_\_\_\_

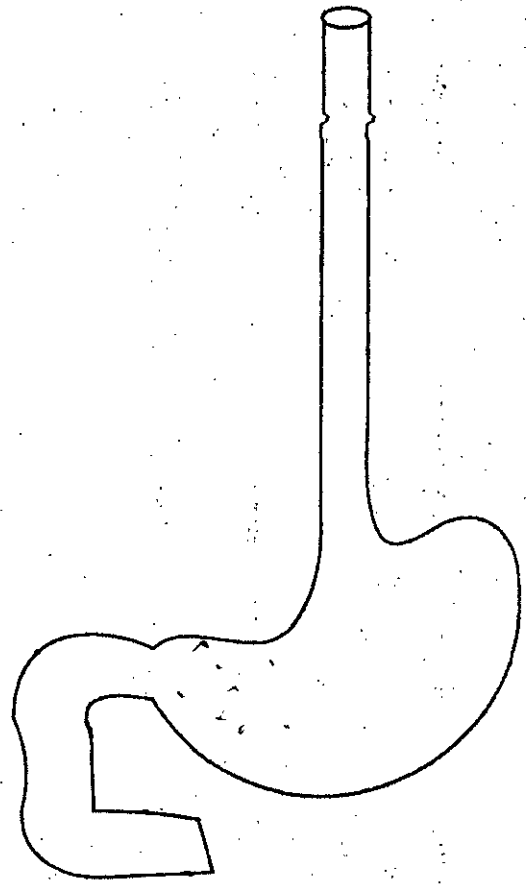
Doudenal Bulb: \_\_\_\_\_

D2 \_\_\_\_\_

COMMENTS

AA et al  
Muhammad Liaqat  
Advocate

Mild Antral  
gastr



Co-Dr  
Muhammad Zafar Ali  
Classified Medical Specialist  
Gastroenterologist  
Rawalpindi

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Col. Dr.

Muhammad Zafar Ali

FCPS, MRCP (UK), MRCP (Ireland),  
FRCP (Edin), FRCP (Dublin), FRCP (London)  
SCE Gastro (Federation of Royal College of Physicians (UK))

Classified Medical Specialist  
and Gastroenterologist

CMH Rawalpindi  
For Appointment: 0333-0951733

ناغہ بروز ہفتہ، اتوار

Zaher Ahmad

Pt's Name:

Age:

Date:

برائے رابطہ: 0333-0951733

31/7/15

کرٹل ڈاکٹر محمد ظفر علی

ایف سی پی ایس، ایم آر سی پی (برکے)، ایم آر سی پی (آئر لینڈ)  
ایف آر سی پی (ایڈن)، ایف آر سی پی (ڈبلن)، ایف آر سی پی (لندن)  
ایس سی ای کیسٹرو (فیڈریشن آف رائل کالج آف فزیشنز برکے)  
کلاسفائیڈ میڈیکل سپیشلسٹ اینڈ ماہر امراض معدہ جگر  
سی ایم ایچ، راولپنڈی

Clinical Notes

Cap Fskun 6

1-1

T Zalcac 150

1-1

T Mefly 100

1-1

Handwritten signature

T Neogas 100  
Handwritten notes in Urdu

AHested.

Muhammad Liaqat  
Advocate



Prof. Dr. Raza Muhammad Khan  
 MBBS, DTCD, MS, FICS  
 Head of Urology Department / Consultant Urologist  
 Ayub Medical Institution, Abbottabad-Pakistan

(30)

06-X-15

928 yrs.

Zahoor Ahmad

• Bil. flanks pain

ē dysuria x 1/2

↑ x 1 day

- fever ē chills ++

§

- Parigyn

ITI — (20)

- CEF-OD

ITI 200 — (30)

- Brufen Plus

ITI — (20)

- Skyzime ✓

↓ - 1-3, 5

§

Abv, Urine RE : 20-25 PC

• TLC : 19,300/cmm.

- X-Ray KUB

ē normal. (N)



**CONSULTANTS:-**

**Prof. Dr. Modood-ul-Mannan**

M.B.B.S (Pesh), M.Phil. (Pb)

Diagnostic Haematologist

Woman Medical College Abbottabad.

**Dr. Misbah-ul-Hannan**

M.B.B.S.

**NAME**      Zaheer Ahmad

**AGE/SEX**    male

**REF. BY:**    Prof Dr Raza Mohammad Khan.

**LAB: NO**     7356

**Date:**        October 6, 2015

### URINE EXAMINATION

#### PHYSICO-CHEMICAL

Colour	Pale Yellow	*Bile pigments	
PH	6.0	*Bile Salts	
*Specific Gravity	-----	*Urobilinogen	
Glucose	NIL	*Ketone Bodies	
Albumin	(+)	*B.J.PROTEINS	
<b>* By special request only</b>			

#### MICROSCOPIC

Pus Cells	20 ---- 25 /HPF	Casts:-	
Red Cells	01 ---- 02 /HPF	Granular	NIL /HPF
Epithel: Cells	NIL	Hyaline	NIL
Crystals:		W.B.Cs	NIL
Ca. Oxalate	NIL		
A. Urates	NIL	Mucus Threads	(+)
A. Phosphate	NIL	Bacteria	NIL
		Dead Spermatozoa	NIL

<b>TEST</b>	<b>RESULT</b>	<b>NORMAL RANGE</b>
-------------	---------------	---------------------

Total White Cells	19,300 /cmm	4,000 – 11,000
-------------------	-------------	----------------


Timing : 9:00 AM to 8:00 PM

**REPORTED BY**

Facilities of Blood C.B.C (Diatron 380). Chemical Test by [Metro Lab 1600DR]. ABGs, Electrolytes (Cobas121, Roche). Peripheral Smear, Bone Marrow Examination. HbA1C, Hb Electrophoresis. Visceral Leishmaniasis by (IT Leish Devisse Method). Others all routine Laboratory Test are available. (R.F.Ts, L.F.Ts, Lipids Profile, Sugar, Urine R/E, C/S, and all Fluids R/E. PT, APTT, BT, CT and all Devisse Method Test).

گندھارا ایبازٹری اعوان پلازہ منڈیاں ایبٹ آباد

Not valid for use in any court of law

  
 Attached  
 Muhammad Liaqat  
 Advocate

Name of Patient: Abida Bilal Age: \_\_\_\_\_ Sex: \_\_\_\_\_  
 Ward / OPD: OPD Lab No. 102 Date: 30/10/15

**SEROLOGY / IMMUNOLOGY**

- BLOOD GROUP
  - PREGNANCY TEST (Urine)
  - RHEUMATOID FACTOR (RA FACTOR)
  - ANTI NUCLEAR FACTOR (A.N.F)
  - C-REACTIVE PROTEIN (C.R.P)
  - MANTOUX TEST
  - Anti DNA
  - V.D.R.L. TEST
  - WIDAL TEST
    - Salmonella TO
    - Salmonella TH
    - Salmonella AO
    - Salmonella BO
- (Significant titre: 1:80 and above at 1 week's interval)
- HB A1C = %  
 Normal Range = 4.5 — 6.5%

- (Hbs Ag) Negative -ive
- ANTIBODIES H.C.V. Negative -ive
- HIV ANTIBODY TEST
- ICT TB ..... IgG ..... IgM .....
- ANTISTREPTOLYSION-O-TITRE (ASOT)
- TOXOPLASMA AGGLUTINATION TEST
- BRUCELLA AGGLUTINATION TEST:
  - Brucella Abortus Brucella Mallitensis
  - D. Dimer Normal Range (1:2) dilution < 200mg/ml
  - FDP Normal Range (1:2) dilution < 05mg/ml
- PSA
- H. Pylori
- Typhi-Dot IgG ..... IgM .....
- Dengue Virus IgG ..... IgM .....

SIGNATURE

*Handwritten notes:*  
 135  
 2 + 2 + 2  
 N Gram Coli % + Xyloid gel  
 BSL 1  
 Bendazol  
 Digest  
 + 1 + 1

*Handwritten signature:* A. A. A.

Muhammad Liaqat  
 Advocate



# HAMED LABORATORY

33

Consultant Pathologist: Prof. Dr. Mrs. Farhat Rizvi, MBBS (Pesh), M.Phil (Punjab), DCP (London), Diploma in Immunology (London)

Doctors Plaza, Opp: Ayub Hospital Complex, Mansehra Road, Abbottabad. Ph: (0992) 381391  
Shafique Medical Centre, Mandian, Abbottabad. Ph: (0992) 383268 Fax: (0992) 384422  
Opposite D.H.Q Hospital, Link Road, Abbottabad Ph: (0992) 343409  
Collection Point Dak Khana Road-Havelian Ph: (0992) 811312

Patient no:  
**26077/15 / 1**  
Lab no:  
**103/4 - Aug**

Name : **ZAHEER AHMED**  
Age/Gender: **30 / M**  
Phone no :  
Date: **04-August-2015**

Time  
**5:00 pm**  
Today  
**Tuesday**

### Urine RE

#### Physical Examination

Quantity **20 mL**  
Colour **YELLOW**  
pH **6.0** (Ref Range 4.5 --- 8.0)  
Specific Gravity **1.020** (Ref Range 1.010 --- 1.030)

#### Chemical Examination

Albumin **TRACES**  
Sugar **NIL**  
Blood **+**  
Urobilinogen **NIL**  
Nitrites **NIL**  
Ketones **NIL**  
Bilirubin **NIL**

#### Microscopic Examination

RBCs **03 - 04 /HPF**  
Pus Cells **NUMEROUS /HPF**  
Epithelial Cells **01 - 02 /HPF**  
Casts **NOT SEEN**  
Crystals **NIL**  
Others **NIL**

*Not asked*  
**Muhammad Liaqat**  
Advocate

**Prof. Dr. Farhat Rizvi**  
Pathologist

All routine tests done by SELECTRA (Merck Germany) fully automated Chemistry Analyzer.

Thyroid Fertility Tumour markers Viral Serology Drugs Allergy

All hormones done by VIDAS (Biornerieux-France) fully automated, Eliza system with same day reporting.

Not valid for use in any court of law

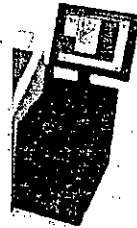


# AYUB TEACHING HOSPITAL

ABBOTTABAD

Accident & Emergency Department

Website: www.ath.gov.pk, Online Complaint: www.cm.ath.gov.pk



Computerized

Book No. 2114

S. No. 077

Patient Name:

Patient ID:

Patient Sex:

Zaheer Ahmed

Patient Yearly No: 28 Years

Male

Patient Age:

Accident & Emergency

Patient Date & Time: Abbottabad

Address:

2150964883

06-Sep-2015 21:12:47 Ni

Amount:

Patient Status: - Yellow

Computer Operator

Print by: - Muhammad Iqbal Rs

Hx:  
Unilateral flank pain  
- Blood in urine.

BP: 100/60

any vitals 1/2 stat

any Abx 1/2 stat  
spoxy on 1U stat

any nalloid 1/2 stat  
vital

any N/S IV  
500 cc  
stat

Rx: 1

10 tabs. Nurofen (500mg)  
1-1-1

10 tabs. Paracetamol Plus  
1-1-1

10 tabs. Citraloka  
2-2-2

Only Computerized Slip will be Accepted

Adv  
- urine R/E

CP

Attested  
Muhammad Iqbal  
Advocate

In case of any complaint register on: www.cm.ath.gov.pk

Official website: www.ath.gov.pk

E-mail: info@ath.gov.pk PABX:0992-381907-14

Face book: www.facebook.com/athabbottabad



nail.com

# Al-Khair Test Lab

Committed to Excel in Quality

Fully automated & Computerized

35

## Center of excellence for diagnosis of diseases

Incorrect result ? Contact: 0300-9110551 / 0333-6404774 For a Single repeat test within 24 hours.

Name	: ZAHEER AHMED	Lab #	: 151295
Gender	: Male	Entry Time	: 10:00:00 PM
Age	: 28 Years	Entry Date	: 06-09-2015
Ref. By	: OPD (ATH)	Print Date	: 06-09-2015
Entry Person	: Enter Your Login Name		

### Urine Analysis

Test Name	Result	Reference Range
<b>Physico Chemical Analysis</b>		
Colour	Pale Yellow	Yellow
pH	5.0	4.5 - 7.5
Sp. Gravity	1.025	1.005 - 1.030 (After 12 hrs. fluid restriction > 1.025)
Glucose	Nil	Nil
Proteins	(++)	Nil
<b>Microscopic Analysis</b>		
Pus Cells	NUMEROUS	M: 0 - 3, F: 0 - 5/HPF
Red Blood Cells	25---30	0 - 2/HPF
Epithelial Cells	A FEW	M: 0 - 3, F: 0 - 10/HPF
Crystals	Nil	Nil/HPF
Casts	Nil	Nil/LPF

Attested  
Muhammad Liaqat  
Advocate

Malik Yasir Ur Rehman  
Director

Dr. Mazhar Malik  
Pathologist

M. Atif Malik  
Microbiologist

Malik Asim Ali  
MS (Biotechnology) COMSATS, IT Abbottabad  
BS (Hons) Microbiology Hazara University

Lab Technology

Address: Ground Floor, Doctor Plaza Opp AMC Abbottabad Helo : 0344-9485625 e-mail:alkhair\_testlab@hotmail.com

ECT of ...

# AYUB TEACHING HOSPITAL

ABBOTTABAD

Filter Out Patient Department



S ABBOTTA

Sex: \_\_\_\_\_

Book No. \_\_\_\_\_

S. No. \_\_\_\_\_

036

36

Patient Name: Abida Bibi

Patient ID: \_\_\_\_\_

Patient Sex: Female

Patient Yearly No: 11510152101

Patient Age: 35 Years

Patient Date & Time: 30-Oct-2015 09:00:22 AM

Address: abbattabad

OPD: Routine

Amount: Rs:-10

Computer Operator: Muhammad Umer

yo.

- P/R bleeding
- Constipation
- Burning, Itching

Adv: Screening

Rx: Syp Cremeffin

2 + 2 + 2

2 (2) (2) Cream 0.4% + Xylorid gel

2

30

Cap Bisleri  
Tab Bendazol

(2)

Tab Digestic  
( + 1 + 1 )

Attested  
Muhammad Liaqat  
Adv.

In case of any complaint register on: [www.cm.ath.gov.pk](http://www.cm.ath.gov.pk)

Official website: [www.ath.gov.pk](http://www.ath.gov.pk)

E-mail: [info@ath.gov.pk](mailto:info@ath.gov.pk) PABX:0992-381907-14

Face book: [www.facebook.com/athabbottabad](http://www.facebook.com/athabbottabad)

**RADIOLOGY & IMAGING DEPARTMENT**  
**AYUB TEACHING HOSPITAL ABBOTTABAD**

37

Prof. Dr. Mohammed Jehanzeb  
Head of Radiology Deptt:

Dr. Khalid Khan  
Associate Professor

Dr. Ghayyur Khan  
Associate Professor

29-1-2018

Annex 'G'

Patient's Name Abida Age \_\_\_\_\_ OPD/Ward OPD  
Part Examined ul abdomen pelvis Serial No. \_\_\_\_\_

**REPORT ULTRASOUND/C.T FORM**

Liver: 13.9 cm at mcl.

G.B. ]  
CBD/P.V. ] → Normal.

Spleen: Normal

midline: Normal

Kidney: ]  
] → NIAD

Attest ed.

Muhamm. Liaqat  
Advocate

UR: Normal

Name of Patient: Abida Age: 38 Sex: \_\_\_\_\_  
 Lab No. 3622 Date: 28/11/2016  
 Ward/OPD: \_\_\_\_\_

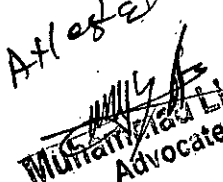
PHYSICO CHEMICAL ANALYSIS	
• COLOUR	<u>P. yellow</u>
• TURBIDITY	
• SEDIMENT	
• pH	<u>6.0</u>
• SPECIFIC GRAVITY	<u>1.015</u>
• GLUCOSE	<u>nil</u>
• ALBUMIN	<u>nil</u>
• KETONES	
• BILIRUBIN	
• UROBILIOGEN	
• BLOOD	
• BILE SALT	

MICROSCOPIC EXAMINATION	
• PUS CELLS	<u>2-3</u>
• RED BLOOD CELLS	<u>nil</u>
• EPITHELIAL CELLS	<u>1</u>
• BACTERIA	
• CRYSTALS	
• CASTS	
• PARASITES	

Adv:  
 Urine R/E  
 Blood CP  
 U/s Abd + Pelvis

Kx:  
 2  
 Tab Nubrat forte  
 0.5 + 1  
 (0.5) 1 + 1  
 cap. folic  
 (0.5) 1 + 1  
 cap. asnal 0  
 (0.5) 1 + 1

29  
 29  
 29

Attested  
  
 Advocate



# AYUB TEACHING HOSPITAL

## ABBOTTABAD

39



**Prof. Dr. Farhat Rizvi**

M.B.B.S, DCP (Lon), DIP (IMMUN), M.Phil

Ph: 0992-381907-14 Ext: 3162

### HEAMATOLOGY

Name : ABIDA Pat Id : OPD/8627  
 Ward : Sample Id : T 133 Lab Operator : q  
 Age : Sex : Analysis Date & Time : 28/1/2016

Test	Result	Unit	Normal Ranges
Total Leukocyte Count	9.7	10 X 3 / uL	4.0 - 10.0
Granulocytes	66.0	%	40 - 75
Lymphocytes	30.5	%	20 - 45
Monocytes	3.5	%	2 - 10
Eosinophils	.0	%	1 - 6
Eosinophils Count	.0	10 X 3 / L	0 - 1
TRBC	5.18	10 X 6 / uL	3.8 - 5.2
HGB	14.0	g/dL	11.0 - 16.0
HCT	44.5	%	35 - 47
MCV	85.9	FL	80 - 100
MCH	27.0	PG	27 - 34
MCHC	31.5	%	25 - 35
RDW	11.0	%	11 - 16
Platelets	394	10 X 3 / uL	150 - 450
ESR		mm / 1st Hour	0 - 10.0
Morphology			
Malarial Parasite			
Remarks			

This test is performed on fully automatic Hematology Analyzer Nihon Kohden Japan  
 Report is generated by computer and does not require signature.

AA 080  
  
 Muhammad Liaqat  
 Advocate

ECT of uterus with

# DR. AZHAR MAHMUD

B.Sc, M.B.B.S (Pb), P.M.D.C No 40-N  
Registered Medical Practitioner  
St. No. 11, Jinnahabad Abbottabad.

40

Date: 23/3/16

Stopper  
of rib margin  
near of hand  
at back hand  
115/70  
110/70  
beating  
more  
ed. avoid old  
wood wall  
not etc

Zaher Ahmad  
30y

- 1. Tabs ACEMED 1007 (20)  
○ لے، > 20 - 10 - 10 - 10
- 2. Tabs PONSAN FLASH (20)  
○ 36 - 36 - 36 - 36
- 3. Tabs ZOPENT 40 (10)  
○ 10 - 10 - 10 - 10
- 4. Tabs ALP 0.25 (10)  
○ 10 - 10 - 10 - 10

باری  
جس

OT/S was on expansion tightening bands.

by INEABOL (3)

○ 10 - 10 - 10 - 10

Attested

Muhammad Dhaqat  
Advocate

REGISTERED.

(41)

(41) (11)

No. 1584 1163/1-E

Dated Abbottabad the 26/02/2015

To,

Mr. Zaheer Ahmed S/O Muhammad Shamaraz  
(Cleaner) C&W Division Abbottabad.  
R/O Mohallah Thanda Pani Village & P.O Beringali  
Tehsil & District Abbottabad

Annex "H"

Subject: - NOTICE/ABSENT FROM OFFICIAL DUTY.

It has been reported by Sub Divisional Officer (Building-II) C&W Abbottabad vide his letter No.6329/E-4 Dated 16/02/2015 that you have been found absent from duties without any intimation to the concerned office.

You are hereby directed through this notice to ensure your presence in the Office of Building Sub Division No. II and explain the cogent reasons for becoming absent within 7 days positively, otherwise strict disciplinary action should be taken under E&D Rules.

- 26/02/2015

06/03/2015

Executive Engineer  
C&W Division A.Abad.

Copy to:-

1. Sub Divisional Officer (Building-II) C&W Department Abbottabad w/r to above. He is directed to report/compliance by official concerned.
2. Head Clerk /DAO (Local) for information.

Executive Engineer  
C&W Division A.Abad.

No.1403

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Rs. Ps.

Received a registered letter addressed to

Date-Stamp

Initials of Receiving Officer with the word "insured" before it when necessary.

Insured for Rs. (in figures) (in words)

If insured.

Insurance fee Rs. Ps. (in words) Weight Kilo Grams

Name and address of sender

Ahmed

Muhammad Liaqat  
Advocate

REGISTERED

49  
2<sup>ND</sup> REMINDER

Annex I 9

NO. 3/07, 163/E

Dated Abbottabad the 8/13/2015

To,

Mr. Zaheer Ahmed S/O Muhammad Shamraz  
(Cleaner) C&W Division Abbottabad.  
R/O Mohallah Thanda Pani Village & P.O Beringali  
Tehsil & District Abbottabad.

Subject: -

NOTICE/ABSENT FROM OFFICIAL DUTY.

Reference:-

1. This Office Letter No. 1584/163/1-E Dated 26-02-2015.

Please refer to Above and it is once again directed to ensure your presence in the Office of Building Sub Division No.II and explain the cogent reasons for becoming absent within 7 days positively, otherwise strict disciplinary action should be taken under E&D Rules.

*o/c*  
EXECUTIVE ENGINEER  
C&W Division Abbottabad

Copy to the:-

1. Sub Divisional Officer, Building-II C&W Department Abbottabad for information.
2. Head Clerk/DAO Local for information.

EXECUTIVE ENGINEER  
C&W Division Abbottabad

Attest

*Muhammad Liaqat*  
Muhammad Liaqat  
Advocate

Annex "J"

84 1163/1E

Dated Abbottabad the 27/08/2015.

The Deputy Director  
Information Abbottabad.

Subject: - SHOW CAUSE NOTICE ABSENT FROM DUTY.

The subject Advertisement (in Urdu) is submitted herewith for early publication the leading news papers i.e Daily AAJ, SHAMA! and PINE etc.

Certified that funds to meet the Expenditure are available during

CFY 2015-16.

EXECUTIVE ENGINEER  
C&W DIVISION ABBOTTABAD

Copy to the:-

1. Chief Engineer (EAST) C&W Department Khyber Pakhtunkhwa Abbottabad for information please.
2. Superintending Engineer C&W Circle Abbottabad for information please.
3. Sub- Divisional Officer (Road-I) C&W Division Abbottabad with reference to the above for information.

EXECUTIVE ENGINEER  
C&W DIVISION ABBOTTABAD

AH est el.

Muhammad Liaqat  
Advocate





45

10

OFFICE OF THE  
EXECUTIVE ENGINEER

C&W DIVISION ABBOTTABAD.

Ref: 376/158E Dated 29-2-2019

Annex <sup>(2)</sup>

OFFICE ORDER

Mr. Zaheer Ahmad S/O Muhammad Shamraz R/O Mohallah Thanda Pani Village & PO Beringali Tehsil & District Abbottabad posted as Cleaner in C&W Division Abbottabad issued a notice for his absence from duty through registered acknowledgement on his home address vide this office letter No. 1584/163-E dated 26/02/2015 but after lapse of 15 days of the issuance of notice, the official did not respond. Then a notice was published in the leading newspapers in which the official was directed to resume his duty within 15 days of the publication of the notice in the newspaper, but after lapse of 15 days of the notice published in the Daily AAJ newspaper on 29/08/2015, the official still failed to resume his duty.

Since, Mr. Zaheer Ahmad S/O Muhammad Shamraz R/O Mohallah Thanda Pani Village & P.O Beringali Tehsil & District Abbottabad is hereby removed from service under Para-9 of Government of Khyber Pakhtunkhwa servants (E&D) Rules 2011 in the best interest of Government.

EXECUTIVE ENGINEER

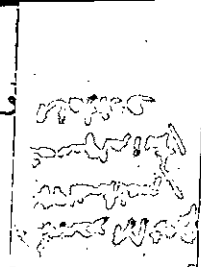
Copy to the;

- i. Superintending Engineer C&W Circle Abbottabad for information please.
- ii. District Account Officer. Abbottabad for information and necessary action please.
- iii. Sub Divisional Officer (Building-II) C&W Division Abbottabad for information and necessary action.
- iv. Divisional Account Officer (Local) for information and necessary action.
- v. Head Clerk C&W Division Abbottabad for information and necessary action.
- vi. Mr. Zaheer Ahmad S/O Muhammad Shamraz R/O Mohallah Thanda Pani Village & P.O Beringali Tehsil & District Abbottabad

AH est

Muhammad Liaqat  
Advocate

EXECUTIVE ENGINEER



مراد جارحانہ جانے ذیل لفوالات مطابق

ڈائیکٹیٹڈ انفارمیشن ایکٹ 2013

1: درخواست برائے لکھی رقم میڈیکل ریکارڈ و سرٹیفکیٹ میڈیکل

Annex "M"

2: درخواست برائے برائے بحالی شواہ

3: نقل شواہ زبانی

4: نقل جواب نوٹس

5: نقل سرورس بک

6: نقل حکم جہاں رو سے سائل کو برطرف کیا گیا

جواب بحالی درخواست ذیل ہے

1: یہ کہ سائل مجھ کو لکھی کا ملازم تھا جبکہ نوکری سے اس وقت مجھ  
برطرف کیا گیا ہے کہ سائل نوکری سے غیر حاضر رہا۔ جبکہ سائل  
25/25 دن تک بیمار رہا جہاں نے اپنی چھٹی کی درخواست اپنے  
اعلیٰ افسران کو دی تھی ایک سالہ سابق سائل نے اپنا میڈیکل  
سرٹیفکیٹ بھی دیا تھا جب سائل بیماری سے شدت ہوا تو  
اپنے ڈیپارٹمنٹ میں گیا اور اپنی نوکری جاری رکھی مگر  
کچھ عرصہ بعد ڈیپارٹمنٹ نے صریح شواہ بند کردی جبکہ  
سائل شواہ کی فری کی درخواستیں بھی دیتا رہا

2: یہ کہ سائل کو اب علم ہوا ہے کہ سائل کو غیر حاضر قرار دے

کر نوکری سے برطرف کر دیا گیا ہے اس لئے جواب سے امتیاز  
ہے کہ مذکورہ بالا ریکارڈ تحت RTI سائل کو فراہم کیا  
جائے

Attested

انفرم 19/3

Zaher

ظہیر احمد ولد محمد شہزاد سائمن سیرنگلی

Muhammad Liaqat  
Advocate



بعدالت جناب چیف انفارمیشن آفیسر خیبر پختونخواہ پشاور

Annex 'A'

استغاثہ:- زیر دفعہ 23 ایکٹ حقوق رسائی معلومات (Right of Information) مجاریہ  
 2013 برخلاف عہدیداران/ افسران متعلقہ ادارہ جناب ایگزیکٹو انجینئر/ پبلک انفارمیشن سی اینڈ ڈبلیو  
 ایبٹ آباد بوجہ عدم مہیا کرنے نقولات 1۔ درخواست برائے چھٹی مہہ میڈیکل ریکارڈ و شوقیٹ کسٹیکس،  
 2۔ درخواست ہائے برائے بحالی تنخواہ۔ 3۔ نقل شوکاژ نوٹس، 4۔ نقل جواب نوٹس۔ 5۔ نقل سروں بک،  
 6۔ نقل حکم جس کی رو سے سائل کو برطرف کیا گیا۔

جناب عالی! درخواست ذیل عرض ہے۔

1۔ یہ کہ سائل محکمہ C&W کا ملازم ہے جسکو نوکری سے اس وجہ سے برطرف کیا گیا ہے کہ سائل  
 نوکری سے غیر حاضر رہا۔ جبکہ سائل 20/25 دن تک بیمار رہا جس نے اپنی چھٹی کی درخواست  
 اپنے اعلیٰ افسران کو دی تھی اسکے ساتھ ساتھ سائل نے اپنا میڈیکل شوقیٹ بھی دیا تھا۔ جب  
 سائل بیماری سے تندرست ہوا تو اپنے ڈیپارٹمنٹ میں گیا اور اپنی نوکری جاری رکھی لیکن کچھ عرصہ  
 بعد ڈیپارٹمنٹ نے میری تنخواہ بند کر دی جبکہ سائل تنخواہ کی فراہمی کی درخواست بھی دیتا رہا۔

2۔ یہ کہ سائل کو جب علم ہوا ہے کہ سائل کو غیر حاضر قرار دے کر نوکری سے برطرف کر دیا گیا ہے۔ تو  
 سائل نے ایک درخواست نسبت جاری فرمائے جانے نقولات افسر مجاز کو گزارے۔ لیکن مجاز افسر  
 نے سائل کو نقولات جاری نہ کیں۔ نقل درخواست محررہ 19-03-11 لف ہے۔

اسلیئے جناب سے التماس ہے کہ سائل کی دادرسی فرمائی جاوے۔ اور تحت قانون RTI سائل کو  
 مذکورہ بالا نقولات عنایت فرمائی جاویں۔

المرقوم: 23/04/2019

Attested.  
 Muhammad Liaqat  
 Advocate

ظہیر احمد ولد محمد شمیر سکنہ بیرنگلی، تحصیل و ضلع ایبٹ آباد۔۔۔۔۔ (سائل) Zaher

03335039711



(49)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION COMMISSION  
7th Floor, Tasneem Plaza, Near Benevolent Fund Building,  
6th Saddar Road, Peshawar  
Email: [complaints.kprti@kp.gov.pk](mailto:complaints.kprti@kp.gov.pk)  
Ph: 92-91-9212643  
Fax: +92-91-9211163

*Annex "0"*

No: RTIC/AR/1-5833/19 / 3657-58  
Dated: 07 MAY 2019

To

The Public Information Officer,  
Communication & Works Division,  
Abbottabad.

Subject:  
Memo:

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO: 05833)**


I am directed to state that a citizen Mr. Zaheer Ahmad has filed an information request with your department for seeking some information, however the same was not provided to him within prescribed time limit, therefore, he has filed a complaint before the KP Information Commission. (copy attached)

2. It is to direct that complete and relevant information may be provided to the complainant within seven working days of the receipt of this letter under intimation to KP information Commission.

Assistant Registrar,  
KP Information Commission,  
Peshawar.

Copy to:-

Mr. Zaheer Ahmad (Complainant)

  
Assistant Registrar,  
KP Information Commission,  
Peshawar.

*Attested*

  
Muhammad Liaqat  
Advocate



5833  
50

OFFICE OF THE  
EXECUTIVE ENGINEER  
C&W DIVISION ABBOTTABAD

PHONE / FAX # 632-9310242

E-mail: cwd.abbottabad@gmail.com

7

No. 1093 / 163-18

Dated 20.1.5 / 2019

Annex CP

To,

The Assistant Registrar,  
KP Information Commission,  
Peshawar.

Subject: SHOW CAUSE NOTICE ABSENT FROM DUTY.

Reference: Your letter No. RTIC/AR/1-5833/19/3657-58, dated 07.05.2019.

As desired in your above noted letter under reference, the service record of Mr. Zaheer Ahmed Ex-DRR Cleaner available in office of the undersigned (photocopy) is enclosed herewith as per detail given below:

1. Service Book
2. Termination Order
3. Absent from duty notices
4. Show Cause notice advertise through Newspapers daily "AAJ" dated 29.08.2015.
5. No application received for leave under any ground.
6. No application received for Re-instatement.

KP-RTI COMMISSION  
Diary No: 2863  
Date: 20-5-19  
Section:

DA/As above

EXECUTIVE ENGINEER

AR  
me  
21/5  
O A / 2  
21/5

Attest

Muhammad Liaqat  
Advocate



51

GOVERNMENT OF KHYBER PAKHTUNKHWA  
KP INFORMATION COMMISSION  
7<sup>th</sup> Floor, Tasneem Plaza, Near Benevolent Fund Building,  
6th Saddar Road, Peshawar  
Email: [Complaints.kprti@kp.gov.pk](mailto:Complaints.kprti@kp.gov.pk)  
Ph: 92-91-9212643  
Fax: +92-91-9211163

REMINDER

Annex "A"

No. KPIC/AR/1-5833/19/4228-30  
Dated 28 MAY 2019

To

The Public Information Officer,  
Communication & Works Division,  
Abbotabad.

Sub:

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION  
(COMPLAINT NO: 05833).**

I am directed to refer this Office letter **No. RTIC/AR/1-5833/19/3657-58** dated **7<sup>th</sup> May, 2019.**

Your Reply to the above mentioned letter is still awaited.

It is once again, requested to provide the requisite information to the complainant within **five** days positively of the receipt of this letter under intimation to this Commission.

Assistant Registrar  
KP Information Commission  
KPK, Peshawar.

Copy to:-

1. Mr. Zaheer Ahmad (Complainant)
2. DMO Concern.

Assistant Registrar  
KP Information Commission  
KPK, Peshawar.

Attested

Muhammed Liaqat  
Advocate



52

GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION COMMISSION  
7<sup>th</sup> Floor, Tasneem Plaza, Near Benevolent Fund Building,  
6th Saddar Road, Peshawar  
Email: [complaints.kprti@kp.gov.pk](mailto:complaints.kprti@kp.gov.pk)  
Ph: 92-91-9212643  
Fax: +92-91-9211163

No: RTIC/AR/1-5833/19

Dated: 17/08/2019

Annex Q-1

To

The Public Information Officer,  
Communication & Works Division,  
Abbottabad.

Subject:

COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO: 05833)

Memo:

I am directed to state that a citizen Mr. Zaheer Ahmad has filed an information request with your department for seeking some information, however the same was not provided to him within prescribed time limit, therefore, he has filed a complaint before the KP Information Commission. (copy attached)

2. It is to direct that complete and relevant information may be provided to the complainant within seven working days of the receipt of this letter under intimation to KP Information Commission.

Assistant Registrar,  
KP Information Commission,  
Peshawar.

Copy to:-

Mr. Zaheer Ahmad (Complainant)

Assistant Registrar,  
KP Information Commission,  
Peshawar.

Muhammad Liaqat  
Advocate

53

محترم جناب اسٹنٹ رجسٹرار صاحب انفارمیشن کمیشن کے۔ پی۔ کے پشاور

Annex Q-II

اسلام علیکم!

بعد از سلام عرض ہیکہ آپ کے یاد ہانی نوٹس کے باوجود بھی محکمہ نے مجھے کوئی بھی مطلوبہ دستاویزات مہیا نہ کی ہے اور تاحال ٹال مٹول کر رہے ہیں۔


آپ سے درخواست ہے کہ آپ ایگزیکٹو انجینئر کو لکھیں کہ وہ مجھے مطلوبہ دستاویزات مہیا کریں۔

العارض

ظہیر احمد ولد محمد شمریز

کلینر CNW

مورخہ 11-06-2019

  
Muhammad Liaqat  
Advocate



54)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION COMMISSION

7<sup>th</sup> Floor, Tasneem Plaza, Near Benevolent Fund Building,

6th Saddar Road, Peshawar

Email: [complaints.kprti@kp.gov.pk](mailto:complaints.kprti@kp.gov.pk)

Ph: +92-91-9212643

Fax: +92-91-9211163

Annex Q-III

No. KPIC/AR/1-5833/19

Dated:

13 JUN 2019

To

Mr. Zaheer Ahmad,  
R/O Bairan Gali,  
Tehsil & District Abbottabad.

Sub:

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION UNDER RTI.  
ACT, 2013 (COMPLAINT NO. 05833)**

I am directed to refer to the subject noted above and to enclose please find the requisite Information received from the **C&W Division, Abbottabad** vide letter **No. 1093/163** dated **20-05-2019** regarding your case.

With these remarks your case stand disposed off.

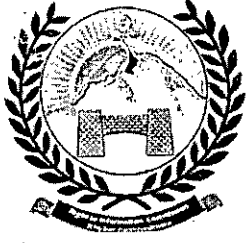
Assistant Registrar  
KP. Information Commission,  
Peshawar.

Copy to:-

Executive Engineer, C&W Division Abbottabad.

Assistant Registrar  
KP. Information Commission,  
Peshawar.

Muhammad Liaqat  
Advocate



(49)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION COMMISSION  
7<sup>th</sup> Floor, Tasneem Plaza, Near Benevolent Fund Building,  
6th Saddar Road, Peshawar  
Email: [complaints.kprti@kp.gov.pk](mailto:complaints.kprti@kp.gov.pk)  
Ph: 92-91-9212643  
Fax: +92-91-9211163

*Annex "0"*

No: RTIC/AR/1-5833/19 / 3687-58  
Dated: 07 MAY 2019

To

The Public Information Officer,  
Communication & Works Division,  
Abbottabad.

Subject:  
Memo:

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION (COMPLAINT NO: 05833)**


I am directed to state that a citizen Mr. Zaheer Ahmad has filed an information request with your department for seeking some information, however the same was not provided to him within prescribed time limit, therefore, he has filed a complaint before the KP Information Commission. (copy attached)

2. It is to direct that complete and relevant information may be provided to the complainant within seven working days of the receipt of this letter under intimation to KP information Commission.

Assistant Registrar,  
KP Information Commission,  
Peshawar.

Copy to:-

Mr. Zaheer Ahmad (Complainant)

  
Assistant Registrar,  
KP Information Commission,  
Peshawar.

*Attended*

  
Muhammad Liaqat  
Advocate



چیف انجینئر / پرنسپل انجینئر صاحب (W & C) گورنمنٹ ایسٹ آباد

تعمیرات کے لئے منظور کیے گئے ٹینڈر ایپلٹیشن ڈاکیومنٹ میں مکمل تفصیل و ضمیمہ  
ایسٹ آباد حال (W & C) ایسٹ ڈویژن ایسٹ آباد  
(پرنسپل / ایسٹ آباد)

نفاذ

- (1) سکٹری W & C پرنسپل ایسٹ آباد
- (2) ڈپٹی سیکریٹری (W & C) پرنسپل ایسٹ آباد
- (3) ایگزیکٹو انجینئر (W & C) ڈویژن ایسٹ آباد

- (4) سب ڈویژنل آفسیئر (W & C) ڈویژن ایسٹ آباد
- (5) ڈسٹرکٹ اکاؤنٹ آفسیئر ایسٹ آباد  
(ر سپانڈنٹ)

ڈپٹی سیکریٹری ایسٹ آباد کی ذمہ داری و فیصلہ کرتے ہوئے E-158/376 نمبر 22/9/19  
کا Backlund Monthly Salaries / Removal Civil Service Act کے تحت  
کے مطابق ریموونڈ کے لئے E & ND Rule 9 و متعلقہ قانون KPK  
کے تحت عمل درآمد کیا جائے۔

H. A. Muhammad A. J. A. T.

جناب عالی! ایسٹ ڈویژن کے

ایسٹ ڈویژنل آفسیئر آرڈر نمبر 1496 نمبر 2/7/2006 کے تحت جس کے تحت  
ایسٹ ڈویژنل آفسیئر آرڈر نمبر 1496 کے تحت ایسٹ ڈویژنل آفسیئر آرڈر نمبر  
Active یعنی وہ ایسٹ ڈویژنل آفسیئر آرڈر نمبر 2006 سے تاحال ڈپٹی سیکریٹری

کامپی آرڈر تقریری اپیلانٹ ارسال 31/7/2016  
نمبر 1496 الف ہے۔

(2) یہ کہ سال 2015 میں شدید عداوت کی وجہ سے ڈاکٹر کی ہدایت کے مطابق MLC کی روشنی میں اپیلانٹ نے جیسا درخواست معہ میڈیکل سرٹیفکیٹ برائے میڈیکل لیپوز کی تقریری جس کو ملکہ نے زبانی طور پر اپیلانٹ کو بتایا کہ آپ کی طبی مشورہ کی ہے جبکہ سائل / اپیلانٹ ڈاکٹر کی ہر حاضر تھا جبکہ رسپانڈنٹ نمبر 3 نے اپیلانٹ کو آفس لیٹر نمبر E-163/1584/1584/26/2/2015 کو show cause نوٹس ارسال کیا جس کے جواب میں اپیلانٹ نے جواب نوٹس معہ سواہر عیاشی نمبر 3 ارسال کیا باوجود اس کے اپیلانٹ حاضر تھا اور اپیلانٹ کے خلاف نمبر 29/8/2015 کو آرڈر اختیار میں اسے سہارا دیا جو کہ سہارا قانون ماوراء قانون ہے اور حقوق اپیلانٹ پر قابل معافی ہے۔

AA-estd  
Muhammad Liaqat  
Advocate

(3) یہ کہ اپیلانٹ کو کمرہ سے سنا نصیب ماوراء قانون متعلقہ میڈیکل لیپوز کو منظور کرنے کی بجائے اپیلانٹ کو show cause نمبر 3 تقریری کے اپیلانٹ کو وقت آرڈر نمبر E-376/1584/1584/22/2/19 کو نوٹس سے بد طرف کر دیا اور 29/8/2015 سے اپیلانٹ کی تنخواہ بھی بند کر دی جس کی بابت اپیلانٹ نے عقیدہ درخواست یا بابت Release of salary رسپانڈنٹ نمبر 3 میں جو رسپانڈنٹ نمبر 3 کے دفتر میں موجود ہیں۔ سائل / اپیلانٹ اس دوران ملکہ نے اپیلانٹ کو جسٹس پر حاضری

یہیں گزری دی آخر کار حکمہ نڈانہ عدر سپیٹرنٹ نمبر 3 نے 22/2/19 کو نوٹری سے برطرف کر دیا جو سٹائل اپیلٹ کو نمبر 4/3 کو وصول ہوا

قول نقل لیسٹریج E-158/376 نمبر 3 22/2/19  
لغایا ہے۔

(4) یہ کہ اپیلٹ نہت R.T.I Act درخواست نمبر 3/9 11 اصولی نڈارہ  
در سپیٹرنٹ نمبر 3 گزری جس کا وقت کا دعویٰ جس پر تاحال حکمہ نڈانہ کوئی  
compliance نہ کی ہے جس کی complaint کا حق محفوظ رکھنا ہے جو  
تاحال pending ہے یہیں وجہ اپیل اپیلٹ will within time ہے۔  
درخواست نڈا حکمہ نہ وصول کرنے سے انکار کیا اس وجہ سے نڈا یہ ریسٹری اور حل

کیا۔  
نقل قول کا پٹی درگواہت نمبر 3/19 11 و  
ریسٹریج نمبر 1052 نمبر 3/19 13 لغایا ہے۔  
Muharrir Liaquat

5- یہ کہ اپیلٹ پورے Aggrieved ہونے کے ساتھ ساتھ اپیل against  
impunged order نمبر 3 22/2/19 دائری جاری ہے۔ اپیل اندر معیا دی ہے۔

GROUNDS

(a) یہ کہ آرڈر نمبر 3 22/2/19 لیسٹریج E-158/376 غیبی قانونی مادرات قانون  
متعلقہ یا ایسی قابل منسوخ ہے۔

(b) یہ کہ آرڈر نمبر 3 22/2/19 کو دہرہ مہرتہ وقت جملہ قانونی لوازمات  
KPK Leave Rules د E & D Rules کی سیکشن 9 کی کسر سے  
1989

compliance نہ ہے جو کہ لبرل اختیار کا ناجائز استعمال کرتے ہوئے  
مہم کیا گیا جو کہ حقوق ایڈوانٹ پر قابل منسوخی  
impugned order ہے۔

(د) یہ کہ اگر ایڈوانٹ مورخ 26/02/15 سے غیر حاضر تھا تو یوں رسپانڈنٹ ٹرانساکشن بروقت  
کارروائی نہ کی ہے جس سے ثابت ہوتا ہے کہ رسپانڈنٹ ٹرانساکشن نے اپنے غیر قانونی و غیر مجازانہ  
افعال کو چھپانے کی خاطر اور ممکنہ نتائج سے بچنے کی خاطر مورخ 29/08/15 کو اسٹینڈر  
جاری کرنا ظاہر کرتے ہیں اور ایڈوانٹ کو عدالت 4 سال بعد مورخ 22/02/19 کو  
توڑی سے بد طرف کرتے ہیں اگر ایڈوانٹ غیر حاضر تھا تو یوں 4 سال کی قانونی  
اختیار کمی لبرل جا کر ایڈوانٹ کو بد طرف کیا گیا جس کا کوئی جواب رسپانڈنٹ ٹرانساکشن  
کے پاس نہ ہے بلکہ وہیں وجہ قیصلہ مذکورہ قابل منسوخی اور ایڈوانٹ قابل بحالی ہے۔

(د) یہ کہ ایڈوانٹ نے بروقت جب ایڈوانٹ کو سٹوکانڈ ٹوٹس ملا تو ایڈوانٹ نے  
عدالت کی رکارڈ کے ساتھ رسپانڈنٹ کو جواب سٹوکانڈ دیا جس کو رسپانڈنٹ نے  
بدعتی سے چھپا دیا ہے اور اسی وجہ سے ہی ایڈوانٹ کو اپنے غیر بدعتی طور پر قیصلہ  
صادر کیا اور ایڈوانٹ کو ٹوٹوں نہ سماعت کا موقع دیا گیا۔ حالانکہ ایڈوانٹ بدعت  
یابی رسپانڈنٹ کے پاس حاضر رہا اور اس نسبت وقتاً فوقتاً اپنی شہواہ پیش  
کو Release کرنے کی درخواست پائے بھی دیتا رہا جو رسپانڈنٹ ٹرانساکشن نے کوئی عملدرآمد  
نہ کیا جس کا ثبوت رسپانڈنٹ کے پاس موجود ہے اور باوجود مطالبہ کے اپنے  
سے انکار ہی ہے اس بنا پر بھی ایڈوانٹ بحالی توڑی اور Back Benefit کا حقدار ہے۔

Muhammad Liaqat  
Advocate

(ع) اسل اندر معیار ہے

(ف) تمام امور با اجازت ڈپٹی کمشنر اسٹیٹ اتھارٹی لہجہت تک اٹھائے جائیں گے۔

لہذا استدعا ہے کہ اسلٹ کا آرڈر نمبر 22/2/19  
 تحت ایڈریس E-376/58 بر خلاف ریٹائرمنٹ کے  
 منسوخ فرما دیا جائے اسلٹ کو 22/2/19 سے بحال  
 فرما جائے اسلٹ کے "back benefit"  
 "from the date of removal" بحال فرمائے جاویں  
 اسلٹ کی monthly salary بحال کی جاوے۔  
 نیز کوئی بھی دیگر دادرسی جو قریب اٹھان ہو دلائی جاوے

الحقوق 3/22/2019

ظہیر احمد ولد محمد شہیر سائمنہ محلہ ٹھنڈہ پانی، گاؤں وڈانی تہہ بسینہ علی  
 تحصیل وضع ایسٹ آباد  
 حال Bps 2 Clerk (W & C)  
 ریٹائرمنٹ آفس (W & C) ایسٹ آباد، وزیر وکیل قادیان  
 Zakeen

CNIC No: 13101-4988718-1  
 Cell No: 0333-5039711

All ester  
 Advocate

## وکالت نامہ

کورٹ فیس

بعدالت جناب سر جسٹس شری بیرونیل ملک کورٹ ریٹ ۲۰۱۸

عنوان: ظہیر احمد نام گورنمنٹمخاطب: ظہیر احمد / سید شہزاد اہلانی

نوعیت مقدمہ:

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے جبری و جواب دہی کل کارروائی متعلقہ آن مقام

نئی دہلی ہائی کورٹ حاصل ہوئی ہے

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ٹائٹ و فیصلہ بر حلف دینے اقبال و دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی و دعویٰ کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا محکمہ 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 داخلہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز جتایا تم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا مد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ جبری مقدمہ مذکورہ کریں اور اگر محکمہ مقرر کردہ میں کوئی جزو جتایا ہو تو وکیل صاحب موصوف مقدمہ کی جبری کے پابند ہوں گے۔ نیز درخواست براد استجارت تاش بیضہ مفلسی کے دائرہ کرنے اور اس کی جبری کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 22/07/2019

Attest  
Muhammad Liqat  
Advocate

بمقام:

المستفاد

المستفاد

ظہیر احمد

Zaher

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**CAMP COURT ABBOTTABAD**

Service Appeal No.1084/2019

Zaheer Ahmed S/O Shamraz,  
Ex-Cleaner (C&W) Division, Abbottabad. .... (Appellant)

**VERSUS**

Govt of Khyber Pakhtunkhwa through  
Secretary C&W Department & others .... (Respondents)

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Deponent



Zahid Amin,  
Sub Divisional Officer,  
C&W Division Abbottabad

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(11)

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

Service Appeal No. 1084/2019

Zaheer Ahmed S/O Shamraz,  
Ex-Cleaner (C&W) Division, Abbottabad. .... (Appellant)

**VERSUS**

Govt of Khyber Pakhtunkhwa through  
Secretary C&W Department & others .... (Respondents)

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 TO 4**

Respectfully Sheweth;-

**PRELIMINARY OBJECTIONS:**

1. That the appellant has no cause of action to file the instant appeal.
2. That the appeal is not maintainable in the present form.
3. That the appeal of the appellant is time barred.
4. That the appellant concealed material fact from this Honourable Tribunal hence appeal is liable to be dismissed.

**FACTS:-**

1. Incorrect, the appellant was appointed as Class-IV in C&W Division Abbottabad and served the department till 26-02-2015. However, the appellant remained absent from official duty for a long period, therefore the department initiated action against him under (E&D) Rules 2011 and finally issued his removal order on 22-02-2019 (Annex-I), hence the claim of appellant that he serving till now, is not correct nor justified.
2. Incorrect, the appellant has never submitted any application for leave nor produced Medical Certificate, rather directed by the department to attend the C&W Division Abbottabad vide letter No.1584/163/1-E dated 26-02-2015 & letter No.3107/163/1-E dated 08-03-2015 (Annex II & III) as well as issued notices through daily news paper to the appellant for resuming duty within 15 days, but he badly failed and did not join his duty.




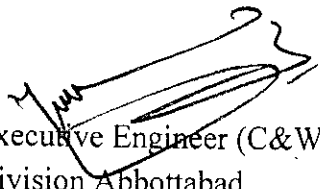
3. The claim of the appellant is incorrect and found it as so called statement.
4. Incorrect, as explained in Para-2 above.
5. Incorrect, as explained in Para-2 above. The appellant has properly proceeded under the relevant Rules and after fulfillment of all codal formalities the removal order of the appellant issued by the Department on 22-02-2019.
6. Incorrect, as explained in para-5 above.
7. Incorrect, as explained in Para-2 above.
8. Incorrect, the appellant has clearly admitted that he was willful absence from official duty for such a long period.
9. All the requisite documents have since been provided to the appellant.
10. The departmental appeal of the appellant was processed but nothing found convening, hence regretted by the appellate authority (**Annex-IV**).
11. The respondents treated with the appellant in accordance with law / rules / policy interalia with the following grounds:-

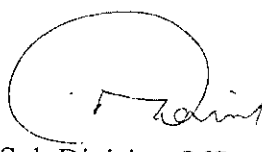
**GROUND:-**

- A. Incorrect, the appellant was processed under relevant rules/ law..
- B. Incorrect, as explained in Para-2 of the Facts above.
- C. Incorrect. As expressed in Para-6 of the facts, the appellant was treated within the prescribed procedure. ,
- D. Para "D" ground of the appeal is without prove hence denied.

**In view of the above, it is humbly prayed that the instant Service Appeal which is not based on facts may please be dismissed with cost.**

  
Secretary to Govt of Khyber Pakhtunkhwa  
(C&W) Department  
(Respondent No.1)

  
Executive Engineer (C&W)  
Division Abbottabad  
(Respondent No. 2 & 3)

  
Sub Division Officer  
Building-II C&W Sub Div Abbottabad  
(Respondent No. 4)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**CAMP COURT ABBOTTABAD**

Service Appeal No.1084/2019

Zaheer Ahmed S/O Shamraz,  
Ex-Cleaner (C&W) Division, Abbottabad. .... (Appellant)

**VERSUS**

Govt of Khyber Pakhtunkhwa through  
Secretary C&W Department & others .... (Respondents)

**AFFIDAVIT**

I, Zahid Amin Sub Divisional Officer C&W Division Abbottabad do hereby affirm and declare that all the contents of the reply / comments are correct to the best of my knowledge and belief and nothing has been concealed.

Deponent



Zahid Amin,  
Sub Divisional Officer,  
C&W Division Abbottabad



OFFICE OF THE  
EXECUTIVE ENGINEER  
C&W DIVISION ABBOTTABAD.

Ref: 376/158E Dated 27-2-09

Annex 1

Annex-I  
4

OFFICE ORDER

Mr. Zaheer Ahmad S/O Muhammad Shamraz R/O Mohallah Thanda Pani Village & PO Beringali Tehsil & District Abbottabad posted as Cleaner in C&W Division Abbottabad issued a notice for his absence from duty through registered acknowledgement on his home address via this office letter No. 1584/163-E dated 26/02/2015 but after lapse of 15 days of the issuance of notice, the official did not respond. Then a notice was published in the leading newspapers in which the official was directed to resume his duty within 15 days of the publication of the notice in the newspaper, but after lapse of 15 days of the notice published in the Daily AAJ newspaper on 29/08/2015, the official still failed to resume his duty.

Since, Mr. Zaheer Ahmad S/O Muhammad Shamraz R/O Mohallah Thanda Pani Village & P.O Beringali Tehsil & District Abbottabad is hereby removed from service under Para-9 of Government of Khyber Pakhtunkhwa servants (E&D) Rules 2011 in the best interest of Government.

EXECUTIVE ENGINEER

Copy to the:

- i. Superintending Engineer C&W Circle Abbottabad for information please.
- ii. District Account Officer, Abbottabad for information and necessary action please.
- iii. Sub Divisional Officer (Building-I) C&W Division Abbottabad for information and necessary action.
- iv. Divisional Account Officer (Local) for information and necessary action.
- v. Head Clerk C&W Division Abbottabad for information and necessary action.
- vi. Mr. Zaheer Ahmad, S/O Muhammad Shamraz R/O Mohallah Thanda Pani Village & P.O Beringali Tehsil & District Abbottabad

EXECUTIVE ENGINEER

REGISTERED.

Annex-II (S)

No. 1584/163/1-E

Dated Abbottabad the 26/02/2015

To,

Mr. Zaheer Ahmed S/O Muhammad Shamaraz  
(Cleaner) C&W Division Abbottabad.  
R/O Mohallah Thanda Pani Village & P.O Beringali  
Tehsil & District Abbottabad

Subject: - NOTICE/ABSENT FROM OFFICIAL DUTY.

It has been reported by Sub Divisional Officer (Building-II) C&W Abbottabad vide his letter No.6329/E-4 Dated 16/02/2015 that you have been found absent from duties without any intimation to the concerned office.

You are hereby directed through this notice to ensure your presence in the Office of Building Sub Division No. II and explain the cogent reasons for becoming absent within 7 days positively, otherwise strict disciplinary action should be taken under E&D Rules.

*Handwritten signature*

*Handwritten signature*  
Executive Engineer  
C&W Division A.Abad.

Copy to:-

1. Sub Divisional Officer (Building-II) C&W Department Abbottabad w/r to above. He is directed to report/compliance by official concerned.
2. Head Clerk /DAO (Local) for information.

Executive Engineer  
C&W Division A.Abad.

No.1403

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide, on which no acknowledgment is due.

Received a registered letter addressed to \_\_\_\_\_ Date/Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_ \*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams

Name and address of sender \_\_\_\_\_

REGISTERED

2<sup>ND</sup> REMINDER

Annex - III

6

NO.

3107 / 163-1E

Dated Abbottabad the

8

13/2015

To,

Mr. Zaheer Ahmed S/O Muhammad Shamraz  
(Cleaner) C&W Division Abbottabad.  
R/O Mohallah Thanda Pani Village & P.O Beringali  
Tehsil & District Abbottabad.

Subject: -

NOTICE/ABSENT FROM OFFICIAL DUTY.

Reference:-

1. This Office Letter No. 1584/163/1-E Dated 26-02-2015.

Please refer to Above and it is once again directed to ensure your presence in the Office of Building Sub Division No.II and explain the cogent reasons for becoming absent within 7 days positively, otherwise strict disciplinary action should be taken under E&D Rules.

*[Signature]*  
EXECUTIVE ENGINEER  
- C&W Division Abbottabad

Copy to the:-

1. Sub Divisional Officer, Building-II C&W Department Abbottabad for information.
2. Head Clerk/DAO Local for information.

EXECUTIVE ENGINEER  
C&W Division Abbottabad



**OFFICE OF THE  
SUPERINTENDING ENGINEER  
C&W CIRCLE ABBOTTABAD**

Phone# 0992-9310258

E-mail:- circle\_atd@yahoo.com

No. *1006 1757*

Dated *29* / 04 / 2019

To,

The Executive Engineer  
C&W Division Abbottabad.

Subject:-

**DEPARTMENTAL APPEAL IN RESPECT OF  
ZAHOR AHMED CLEANER.**

Reference:-

Your office letter No. 806/163-1E dated 11.4.2019.

It is to inform you that the above named official has submitted his departmental appeal for his dismissal from services. In this regards you are directed to inform the appealant that you have dismissed from services due to absent from duty since 02/2015 and all the facts mentioned in the letter under reference are also intimated to him.

**SUPERINTENDING ENGINEER**