

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT ABBOTTABAD.

Service Appeal No. 11576/2020

Date of institution 05.10.2020

Dr. Iqbal Jan, Resident of Sir Syed Colony Abbottabad, Currently Serving
as Incharge Rural Health Centre Sherwan.

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Health Services
Peshawar and five others.

ORDER
23.09.2021

Mr. Sardar Basharat, Advocate, for the appellant present. Dr. Shah
Faisal, DHO (Abbottabad) alongwith Mr. Usman Ghani, District Attorney
for the respondents present.

Learned counsel for the appellant stated that relief so sought by
the appellant through instant appeal has already been granted to him,
therefore, as per instruction of the appellant, he wants to withdraw the
instant service appeal. In this respect, he submitted written application,
which is placed on file.

In light of the above, the appeal in hand stands dismissed as
withdrawn. Parties are left to bear their own costs. File be consigned to
the record room.

ANNOUNCED
23.09.2021



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

BEFORE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA
PESHAWAR

Dr. Iqbal Jan

V/S

Govt. of KPK & others.

**APPLICATION FOR WITHDRAWAL OF
SERVICE APPEAL NO. 11576/20 FROM THE
TRIBUNAL.**

Respectfully Sheweth;-

Contents of the application are as under;-

1. That above titled service appeal was pending adjudication before this Honourable Tribunal and was fixed for reply of the respondents.

2. That petitioner/ appellant who was declared invalidated and incapacitated, after regaining her health applied for reinstatement after re-examination by standing Medical Board have been declared fit to continue her services as well as petitioner have been satisfied from the respondent No. 5 & 6 after receiving her salary and other allowances.

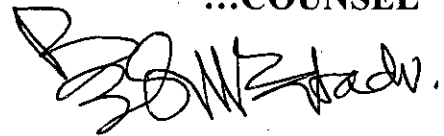
3. That appellant/ petitioner after reinstatement and satisfaction from other respondents is no more interested in the instant appeal.

It is therefore, humbly requested that appellant/ petitioner application for withdrawal of appeal be allowed.

...APPELLANT
Dr. Iqbal Jan

Through

...COUNSEL




(SARDAR BASHARAT)
Advocate High Court, Abbottabad

Dated;22/06/2021

17.03.2021

Learned counsel for the appellant present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General respondents present.

Preceding date was adjourned on a Reader's note, therefore notice be issued to respondents for submission of reply/comments. To come up for reply/comments on 22/04/2021 before S.B at Camp Court Abbottabad. In the meanwhile, any action taken against the appellant shall not be finalized.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad

22-4-21

Due to covid 19, the case is adjourned
to 23-9-21 for the same.

S.
Reader

21.10.2020

Appellant in person present.

Usman Ghani learned District Attorney alongwith Hazrat Shah Superintendent, Dr. Salim Javid Litigation Officer and Amjid Ali Assistant for respondents present.

Written reply/comments on behalf of respondents is still awaited. Representatives of respondents made a request for adjournment in order to furnish reply/comment. Opportunity is granted. To come up for written reply/comments on 19.11.2020 before S.B at Camp Court, Abbottabad. In the meanwhile, any action taken against the appellant shall not be finalized.

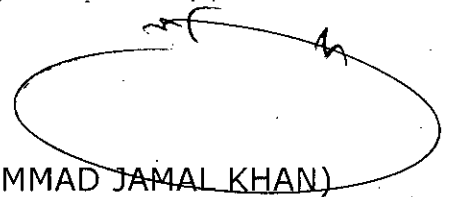


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

19.11.2020

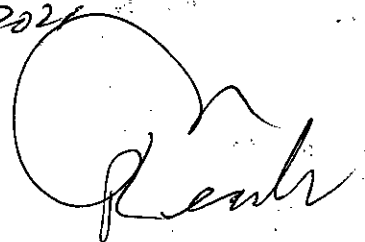
Learned counsel for appellant is present. Mr. Usman Ghani, District Attorney for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned District Attorney is directed to ensure presence of the representative of the department and submit reply on the next date. Adjourned to 16.12.2020 on which date file to come up for written reply/comments before S.B at Camp Court, Abbottabad. In the meanwhile, any action taken against the appellant shall not be finalized.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

*Due to COVID-19 case is
adjourned to 17-03-2021*




06.10.2020

Counsel for the appellant present.

It is contended that on 09.03.2020, the appellant submitted an application for retirement on medical grounds. In pursuance thereof a Medical Board was constituted which submitted its opinion on 10.06.2020, wherein, it was laid that she/appellant may be boarded out on medical grounds as she was permanently incapacitated. On 03.07.2020, an application was submitted by the appellant, wherein, it was agitated that the opinion of Standing Medical board may be obtained afresh as the appellant had undergone specialized treatment and was feeling better and fit to continue her duty. It was further stated that although no further action was taken by the respondents upon the opinion dated 10.06.2020, the salary of appellant was stopped since 01.07.2020. The action of respondents was unilateral and against the rules as well as service rights of the appellant.

In view of the available record and the arguments of learned counsel, instant appeal is admitted to regular hearing but subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 21.10.2020 before an S.B of this Tribunal at Camp Court, Abbottabad.

There is an application for grant of interim relief in terms that the respondents may be restrained from taking any adverse action against the appellant on the basis of proceedings pending before them and release of her withheld salary. Notice of the application be also given to the respondents for the date fixed. In the meanwhile, any action taken against the appellant shall not be finalized.


Appellant Deposited
Security & Process Fee


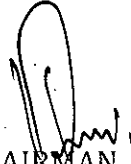

Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 11576 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/10/2020	<p>The appeal of Dr. Iqbal Jan presented today by Mr. Sardar Basharat Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>06/10/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. 11576 /2020

Dr. Iqbal Jan, resident of Sir Syed Colony Abbottabad, Currently Serving as Incharge Rural Health Centre Sherwan.

...APPELLANT

VERSUS

Govt. of KPK, through Secretary Health Services Peshawar & others.

...RESPONDENTS

SERVICE APPEAL
INDEX

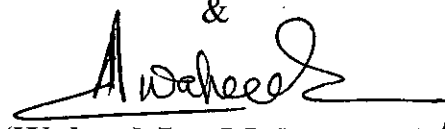
S.#	Description	Page #	Annexure
1.	Appeal alongwith affidavit	1 to 10	
2.	Copy of notification of appointment and promotion letter in BPS-19		"A" & "B"
3.	Copy of application for retirement on medical ground		"C"
4.	Copy of opinion of board and letter dated 29/06/2020		"D" & "E"
5.	Copy of complete medical record alongwith opinion of doctor		"F"
6.	Copy of attendance register		"G"
7.	Copy of departmental appeal		"H"
8.	Copies of medical certificate alongwith opinion		"I"
9.	Copies of notification dated 04/09/2020 and application dated 10/09/2020		"J" & "K"
10.	Wakalatnama		

...APPELLANT

Through

Dated: 05/10 /2020


(SARDAR BASHARAT)

&

(Waheed Jan Muhammad) ^{AW}
Advocates High Court, Abbottabad

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10988

Dated 05/10/2020

Service Appeal No. 11576 /2020

Dr. Iqbal Jan, resident of Sir Syed Colony Abbottabad, Currently Serving as Incharge Rural Health Centre Sherwan.

...APPELLANT

VERSUS

1. Govt. of KPK, through Secretary Health Services Peshawar.
2. Director General Health Services KPK, Peshawar.
3. District Health Officer, Abbottabad.
4. Medical Superintendent (M.S) District Abbottabad.
5. Accountant General, Khyber Pakhtunkhwa.
6. District Accounts Officer, Abbottabad.

....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974, FOR DECLARATION TO THE EFFECT, THAT THE ILLEGAL ACTIONS OF THE RESPONDENTS DEPARTMENT OF NOT DROPPING/ WAIVING OF THE CASE OF THE RETIREMENT ON MEDICAL GROUND AFTER REGAINING OF THE HEALTH OF THE APPELLANT AND NOT RELEASING MONTHLY SALARY OF APPELLANT AS ILLEGAL AND NULL AND VOID.

Filed to-day
Registrar

PRAYER: ON ACCEPTANCE OF INSTANT APPEAL, THE IMPUGNED ACTS OF RESPONDENT BY NOT DROPPING/ WAIVING OF THE CASE OF RETIREMENT ON MEDICAL GROUND AFTER REGAINING THE HEALTH OF THE APPELLANT MAY GRACIOUSLY BE SET ASIDE AND THE RESPONDENTS BE DIRECTED TO RELEASE THE MONTHLY SALARY OF APPELLANT FROM 1ST JULY, 2020 TO TILL DATE ALONGWITH HEALTH PROFESSIONAL ALLOWANCE FOR ONE MONTHS OF YEAR OF 2019 AND NON PRACTICING ALLOWANCE FOR 14 MONTHS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED.

Respectfully Sheweth:-

Brief facts of the case are as under;-

1. That the appellant is presently serving as incharge PWMO RHC Sherwan in Health Department having (BPS-19) and appellant has got almost 25 years of service having unblemished record, besides satisfaction of all the high-up of the department. Copy of notification of appointment is annexed as Annexure "A" and promotion letter in BPS-19 as Annexure "B".

2. That due to the ailing health of the appellant, the appellant applied for the retirement on Medical Ground. Here this fact must not be left to fade into oblivion that, the respondent No. 3 remained in inimical working relationship with the appellant for reason best known to him, due to this reason respondent No. 3 illegally and based on malafide intention deduct the professional allowance for the year of 2019 and non practicing allowance for 14 months. Copy of application for retirement on medical ground is attached as Annexure "C".
3. That, the case of retirement of appellant was sent by the respondent No. 3 to respondent No. 2 on 20/03/2020 which was recommended for retirement on medical ground on 10/06/2020 by standing medical board which come into the knowledge of appellant through letter dated 29/06/2020 by respondent No. 3. Copy of opinion of board and letter dated 29/06/2020 are annexed as Annexure "D" & "E".
4. That during the lapse of the above said intervening period, the appellant regained her health with the grace of Almighty Allah in the entire elimination of disease suffered by the appellant. Copy of complete medical record alongwith opinion of doctor is attached as Annexure "F".

5. That, it is pertinent to mention here that the appellant in this little span of time had neither relinquished the charge nor has given any break in the continuity of service, rather has been performing her duties with complete zeal & zest. Copy of attendance register is attached as Annexure "G".
6. That however the case of the appellant has been recommended for the retirement on medical ground but the salary of the appellant has been stopped from 01st July, 2020 till date alongwith all allowances.
7. That thereafter, the appellant has filed departmental appeal before the respondent No. 2, but till date the respondent No. 2 give no heed to the grievances of present appellant also no final order was passed till date. Copy of departmental appeal is attached as Annexure "H".

That feeling aggrieved from the inaction of the respondents of dropping the process of retirement on medical ground in the wake of regaining of health and for fitness of service, and

stopping of the salary without any rhyme and reason, the appellant has come to this Honourable court, inter-alia on the amongst many other grounds;-

GROUNDS:-

- a. That the act of respondent of not dropping/ waiving of the case of retirement of appellant on medical ground even after regaining of health and despite many written request made to the respondent and stoppage of salary from 1st July 2020 till date is illegal, perverse, unilateral, despotic, discriminatory against the law, rules, policy on the subject matter and against the attending circumstances of the case, hence liable to be set aside.
- b. That undoubtedly there is a law rule and policy of the Provincial Govt. of KPK, that a person can be re-employed in the service in the matter relating to the regaining of health and what to think about the case of appellant where no final order of retirement has been passed.

- c. That as a matter of right, the appellant is pre-empting his valuable right guaranteed under the Constitution of Pakistan 1973, beside taking recourse of the rules in connection with the re-employment in service.
- d. That it is less understandable indeed incomprehensible that why the appellant is being compelled for retirement on medical ground since she has been declare with sound health and fitness for the purpose of assigning the Govt. duties by a competent consulting from highly reputed institution for health service in Pakistan i.e. Shifa International Hospital, Islamabad. Copies of medical certificate alongwith opinion is annexed as Annexure "I".
- e. That at the most the respondents can constitute their own medical board for the purpose of their satisfaction in order to access the fitness of appellant for which

appellant is ready as appellant has gained her health during this period.

- f. That otherwise, the disease suffered by the appellant by nature trivial and care-able and not of the heinous nature resulting in incapacitated for the purpose of Govt. Job.
- g. That by no stretch of imagination, the respondents can stop the salary of the appellant since, the appellant has never relinquished the charge and discontinued her services.
- h. That, this fact is suggestive of the fact that, the appellant is a honest, bonafide and dedicated one because the respondent No. 2 issued a notification where appellant was recommended for in service training of BPS-20 alongwith the others through a notification No. 15017-110 dated 04/09/2020, incomppliance of which respondent No. 4 was informed through an application dated 10/09/2020 and submitted her arrival report before respondent No. 4.

Copies of notification dated 04/09/2020 and application dated 10/09/2020 are annexed as Annexure "J" & "K".

- i. That there is no other efficacious remedy available to the appellant except the instant appeal.
- j. That the other grounds would be urged at the time of arguments.

It is therefore, most humbly prayed that on acceptance of instant appeal, the impugned acts of respondent by not dropping/ waiving of the case of retirement on medical ground after regaining the health of the appellant may graciously be set aside and the respondents be directed to release the monthly salary of appellant from 1st July, 2020 to till date alongwith health professional allowance for the year of 2019 and non practicing allowance for 14 months. Any other relief which this Honourable Tribunal deems fit and proper in the circumstances of the case may also be granted.

INTERIM RELIEF;

In the meanwhile, respondents be restrained from taking any adverse action against the present appellant on the basis of proceedings pending before them and be directed to place the present appellant on his actual position and release her monthly salary from 1st July, 2020 to till date.



...APPELLANT

Through

Dated: 05/10 /2020



(SARDAR BASHARAT)

&



(WAHEED JAN MUHAMMAD)
Advocates High Court, Abbottabad

VERIFICATION:-

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



...APPELLANT

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No. _____/2020

Dr. Iqbal Jan, resident of Sir Syed Colony Abbottabad, Currently Serving as
Incharge Rural Health Centre Sherwan.

...APPELLANT

VERSUS

Govt. of KPK, through Secretary Health Services Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT


I, Dr. Iqbal Jan, resident of Sir Syed Colony Abbottabad, Currently Serving
as Incharge Rural Health Centre Sherwan, do hereby solemnly affirm and
declare that the contents of foregoing appeal are true and correct to the best
of my knowledge and belief and nothing has been concealed therein from
this Honourable Court.



DEPONENT

ATTESTED




05-10-2020

11**Annexure 'A'****ATTESTED**DIRECTORATE GENERAL HEALTH
SERVICES, NWFP, PESHAWAR.**B**
5/10/20OFFICE ORDER.

On the recommendations of NWFP Public Services Commission, the Governor NWFP is pleased to appoint the following Doctors as Women Medical Officer (BPS-17) in the Health Department on temporary basis on the usual terms and conditions with immediate effect.

Consequent upon their appointment as WMOs (B-17) the following posting/transfers are hereby ordered in the interest of Public Service with immediate effect.

S.NO.	NAMES OF DOCTORS	FROM	TO	REMARKS.
01.	Dr. Mah Munir Khan D/O Sher Mohammad Khan. TMO, HSTH, Peshawar.	1st: Appoint (PSC) WMO (Contract) SHS, Swat.	WMO, SHS, Swat.	Against her original post.
02.	Dr. Sabino Aziz D/O Aziz Ahmed, TMO, KMC, Peshawar.	1st: appoint: (PSC) WMO (Contract) SHS, Charsadda.	WMO, SHS, Charsadda.	-do-
03.	Dr. Maria Hatim D/O Hatim Ali.	1st appointment. (PSC)	CH, Sherwan Distt: A-Abad.	Against the V/Post.
04.	Dr. Beena Hamid D/O Abdul Hamid.	-do-	WMO, THQ, Hosp: Tangi.	-do-
05.	Dr. Shazia Naz D/O Faqeer Mehd Khan. TMO, HSTH, Peshawar.	1st: Appoint: (PSC) WMO (Contract) SHS, Swat.	WMO, SHS, Swat.	Against her Orig: post.
06.	Dr. Sultan Bibi D/O M. Zahid Shah.	1st: Appoint: (PSC) WMO (Contract) SHS, A-Abad.	WMO, DHQ, Hosp: A-Abad.	Against the V/Post.
07.	Dr. Rukhshani Anwar D/O M. Anwarud Din. TMO, HSTH, Peshawar.	1st: Appoint: (PSC) WMO (Contract) SHS, Bannu.	WMO SHS, Bannu.	Against her orig: Post.
08.	Dr. Shagufta Parveen D/O Fathah Khan.	1st appointment. (PSC)	WMO, CH, Khanpur Ayubia Distt: A-Abad.	Against the V/Post.
09.	Dr. Sadia Qayum D/O Qayum Nawaz.	-do-	WMO, CH, Chowdwan (DI KHAN)	-do-
10.	Dr. Shahroz Ajmal D/O Ajmal Khan Khattak. TMO, PGMI, Peshawar.	1st: appoint: (PSC) WMO (Contract) SHS, Karak.	WMO, SHS, Karak.	Against her original post.
11.	Dr. Rugia Khan S/O Baz Mohammad Khan.	1st appointment. (PSC)	WMO, AHQ, Hosp: Parach.	Against the V/ Post.
12.	Dr. Fakhira Iqbal D/O Mohammad Iqbal.	1st: appoint: (PSC) WMO (Contract) DHQ, Hosp: Mardan.	WMO, DHQ, Hosp: Mardan.	Against her original post.
13.	Dr. Narghana Iftikhar D/O Iftikharud Din.	1st: appointment. (PSC)	WMO, Govt: Maternity Hosp: Peshawar.	Against the V/ post.

(Page No. 2.)

14. Dr. Bilgees Fatima D/O Haq Dad Khan. Ist: Appoint: (PSC) TMO, HSTH, Against the post
WMO (Contract) Peshawar. of (L.R)
15. Dr. Anjum Ara D/O Zia-ud-Din Khan (TMO), HSTH, Pesh: Ist: Appoint: (PSC) WMO, SHS, Dir. Against her Orig
WMO (Contract) SHS Dir. post.
16. Dr. Fareesa Waqat D/O Salah Bin Ahmad. Ist Appoint: (PSC) WMO, RHO, Against the
Kewani vacant post.
Distt: Manshehra.
17. Dr. Asma Akram D/O Akram Khan. -do- WMO, RHC, -do-
Gumbat Distt: Mardan.
18. Dr. Rashida Kareem D/O Fazal Karim WMO, SHS, Against the her
WMO (Contract) SHS, Karak. Orig: post.
19. Dr. Razia Rani, D/O Mohammad Farooq TMO, HSTH, Pesh: Ist: a ppoint: (PSC) WMO, SHS, -do-
WMO (Contract) Swat. Swat.
20. Dr. Iqbal Jan D/O Mohammad Yaqoob. Ist: appoint: (PSC) WMO, Rural Mobile Disp: -do-
WMO (Contract) Rural Mobile Disp: Manshehra.
Mobile Disp: Manshehra.
21. Dr. Salma Akbar D/O Taj Akbar. Ist Appoint: (PSC) WMO, HMC, Against the
WMO (Contract) Peshawar. vacant post.
SHS, Chitral.
22. Dr. Farhat Iqbal D/O Iqbal Hussain. Ist: Appoint: (PSC) WMO SHS, Against her
WMO (Contract) Mardan. Orig: post.
SHS, Mardan.
23. Dr. Riffat Sherin D/O Gul Roz Khan. Ist; a ppoint: (PSC) WMO, AHQ, -do-
WMO (Contract) AHQ, Hosp: Miranshah.
Hosp: Miranshah. Miranshah.
24. Dr. Shagufta Gul D/O Abdul Rehman. Ist appoint: (PSC) WMO, HMC, Against the
WMO (Contract) Peshawar. vacant post.
SHS, Bannu.
25. Dr. Naseem Wasiq D/O Syed Wasiq Shah. Ist: a ppoint: (PSC) WMO, CH, -do-
Kaghan (Manshehra) Distt: .
26. Dr. Sadia Mustafa D/O Ghulam Mustafa. Ist: a ppoint: (PSC) WMO, CH, -do-
Thana (MKD Agency) /
27. Dr. Najma Begum D/O Moiz ud Din. Ist: Appoint: (PSC) WMO, THQ, Dir. Against her
WMO (Contract) Dir Khas. Orig: post.
THQ, Hosp: Dir. Khas Distt: Dir.

(OIP No. 3)

(13)



(Page No. 3)

As a result of their aforesaid appointments the contract appointments of the doctors at S.No. 1, 2, 5 to, 7, 9, 12, 14, 15, 18 to 25 & 27 above are hereby terminated with immediate effect.

The contract MOs who did their Part-I in various Specialities and working in the PGMI/LRH/HSTH Peshawar for completion of their requirements should continue to work there till the availability of vacant posts in the said institutions and draw their salaries from their original places of posting.

SD/-----
Director General Health Services, NWFP, Peshawar.

NO. 2490-555/E.I. DATED PESH: THE 29/4/1997.

Copy forwarded to the:-

01. Secretary Health NWFP, Peshawar.
 02. Administrator, Hayatabad Medical Complex, Peshawar.
 03. All Divil: Director Health Services, in NWFP.
 04. Incharge Govt; Maternity Hospital, Peshawar.
 05. MS, DHQ, Hospital, Mardan.
 06. MS, AHQ, Hospital, Parachinar.
 07. MS, AHQ, Hospital, Miranchah.
 08. MS, DHQ, Hospital, Abbottabad.
 - 09-20. District Health Officers, Mardan, A-Abad, Mansehra, Swat, Dir, Chitral, Malakand, Karak, Bannu, and DIKHAN.
 - 21-31. District Accounts Officers, Charsadda, Peshawar, A-Abad, Mansehra, Swat, Dir, Chitral, Malakand, Karak, Bannu, DIKHAN.
 32. Agency Accounts Officer, Parachinar and Miranchah.
 33. Accountant General, NWFP, Peshawar.
 34. All Doctors concerned.
 35. Dean PGMI, Peshawar.
 36. Administrator HSTH, Peshawar.
 37. AS-IV DGMS, Office NWFP, Peshawar.
 40. Acctt: Health Directorate NWFP, Peshawar.
- for information and necessary action.

DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

MINHD: ISHAQ/
29.04.1997.

NO:SOH(E-VI4-22/2019

The Government of Khyber Pakhtunkhwa on the recommendations of the Provincial Selection Board is pleased to promote the following Senior Medical Officers BS-18 to the post of Principal Medical Officers BS-19 on regular basis with immediate effect:-

ATTESTED

S.NO	Name of Doctor	S.NO	Name of Doctor
1	Dr. Nayyar Halim D/O Tanzeemul Haq	21	Dr. Anzala Khan S/O Chakhal Khan
2	Dr. Muhammad Younis Nadeem S/O Sikandar Khan	22	Dr. Niaz Muhammad S/O Yar Muhammad
3	Dr. Muhammad Sadiq S/O Saeedullah Joh	23	Dr. Muhammad Anwar S/O Fazal Muhammad
4	Dr. Sher Zaman S/O Haji Sherin Khan	24	Dr. Razi Mehmood Khan S/O Raza Khan
5	Dr. Masood-uz-Zaman S/O Ali Zaman	25	Dr. Bashir Ahmad S/O Shamsur Rehman
6	Dr. Fanda Muhajid D/O Taj Ali	26	Dr. Sakin Abbas S/O Ihsanullah
7	Dr. Zubaida Khanum D/O Jumna Khan	27	Dr. Muhammad Qamar S/O Firdous
8	Dr. Farzana Ayub D/O Sahibzada Muhammad Ayub	28	Dr. Akbar Khan S/O Fazal Manan
9	Dr. Najma Sultana D/O	29	Dr. Muhammad Yousaf S/O Muhammad Sharif
10	Dr. Abdur Rehman S/O Akbar Jan	30	Dr. Nasrullah S/O Rehmani Gul
11	Dr. Iqbal Jan D/O Muhammad Yaqoob	31	Dr. Fazl Raziq Khan S/O Fazle Khaliq Khan
12	Dr. Sultan Bibi D/O Muhammad Zahir Shah	32	Dr. Fida Hussain S/O Khan Saddique
13	Dr. Muhammad Younas s/o Haji Subhan	33	Dr. Mukhles Raza Ayub S/O Muhammad Ali Ayub
14	Dr. Zulfqar Ali S/O Shukat Ali	34	Dr. Fahem Shah Roghani S/O Marifat Shah
15	Dr. Rashid Hassan Khan S/O Amanullah Khan	35	Dr. Muhammad Nadeem S/O Haji Khan
16	Dr. Noor Muhammad S/O Palawan Khan	36	Dr. Rahman Gul S/O Haji Noor Gul
17	Dr. Ijaz Hussain Zaidi S/O M. Mehmood Zaidi	37	Dr. Saeed Ahmad S/O Habib Ahmad
18	Dr. Muhammad Saleem S/O Muhammad Ameen	38	Dr. Feroz Shah S/O Rahim Shah
19	Dr. Abdul Mujeeb S/O Abdul Waheed	39	Dr. Ambreen Wali D/O Abdul Wali
20	Dr. Iqbal Hussain S/O Musafar Khan	40	Dr. Waseem Kashif S/O Sahibzada Said Johar

B
5/10/20

Annexure "C" 15,

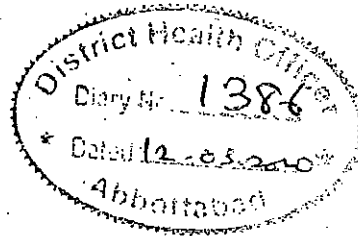
ATTESTED

In charge

R.H.C, Sherwan

No: 16 PF Dated: 9-3-2020

*R.H.C Sherwan
5/10/20*



The District Health Officer,
District Abbottabad.

Subject: Retirement on Medical Ground

Enclosed please find herewith my detail request for onward submission to secretary to Govt: of KPK, health Dept: Peshawar regarding retirement on "Medical Grounds". The same may please be forwarded to Quarter concerned. For necessary approval your's early co-operation in the matter will be highly appreciated.

Enclosures (2 nos) (2)

Dr. Iqbal Jan

In Charge

R.H.C, Sherwan

*Essen
forward to DPHS
for early approval
[Signature]
DHO*

Annexure 'D'

J6



OFFICE OF THE DISTRICT HEALTH OFFICER ABBOTTABAD.

No. 5809 /Estab/D/DGHS

Dated Abbottabad the 20/3/2020.

To,

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Subject:
Sir,

Retirement on Medical Grounds.

ATTESTED

[Handwritten signature]
5/11/20

Enclosed please find herewith a self-explanatory application bearing No.16/PF dated:09:03.2020 alongwith its enclosures in respect of Dr. Iqbal Jan, Principal-Medical Officer (BS-19) Rural Health Center Sherwan with regard to the subject cited above is attached herewith for information and further necessary action please.

[Handwritten signature]
District Health Officer,
Abbottabad.

[Handwritten signature]
11/7/20
20/03/20

District Health Officer, Link Road, Abbottabad.

Phone # 0992-9310192

Fax # 0992-9310196

edohabd@yahoo.com

ANNEXURE 'E'

UD

OFFICE OF THE DISTRICT HEALTH OFFICER ABBOTTABAD

/Estab/D/TA

09/06/20

Dated Abbottabad the

29.06.2020

The Director General Health Services
Khyber Pakhtunkhwa, Peshawar

ATTESTED

[Handwritten Signature]

Issuance of Retirement Order of Dr. Iqbal Jan Principal Medical Officer (BS-19).

The case of proceedings of Standing Medical Board received No. 1575-2/MS SMB/2019-20 dated 19.06.2020 from the Chairman Standing Medical Superintendent Police / Services Hospital Peshawar in respect of Dr. Iqbal Jan Medical Officer (BS-19) attached to Rural Health Center Sherwan Abbottabad is being forwarded for onward submission to the competent authority for issuance of necessary order please

District Health Officer
Abbottabad

/Estab/D/DGHS

Copy forwarded to the Incharge PMO RHC Sherwan for taking necessary action.

[Handwritten Signature]
District Health Officer
Abbottabad

A Better copy of
Annexure 'E'

(017A)

OFFICE OF THE DISTRICT
HEALTH OFFICER ABBOTABAD

No. 11909/Estab/D/DGHS

Dated Abbotabad 29/06/2020

To,

The Director General Health Service
Khyber Pakhtunkhwa, Peshawar,

Subject:- **ISSUANCE OF RETIREMENT ORDER OF DR. IQBAL JAN**
PRINCIPAL MEDICAL OFFICER (BPS-19)

The Case of proceedings of Standing Medical Board received vide letter No. 18 19-20/MS/SMB/2019-20 dated 19/06/2020 from the Chairman Standing Medical Board Medical Superintendent Police /Service Hospital Peshawar in respect of Dr. Iqbal Jan Principal Medical Officer (BPS-19) attached to Rural Health Center Sherwan Abbotabad is attached herewith for onward submission to the competent authority for issuance of necessary retirement order please.

District Health Officer
Abbotabad

No. 11909/Estab/D/DGHS

Copy forwarded to Incharge PMO RHC Sherwan for information and necessary action.

District Health Officer
Abbotabad

18

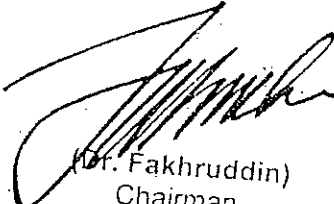
OFFICE OF THE CHAIRMAN STANDING MEDICAL BOARD/MEDICAL SUPERINTENDENT POLICE/SERVICES, HOSPITAL PESHAWAR.


The Standing Medical Board comprising the following members assembled in the office of the Medical Superintendent Police/Services, Hospital Peshawar to examine Dr. Iqbal Jan PMO.

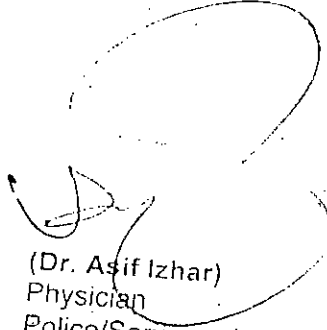
The Standing Medical Board is of the opinion that she is a known case of Asthma for the last 18 years. She is also having severe depressive illness along with that she is having long standing gastritis/IBS. OGD and biopsy done. She is also a known case chronic urticaria, also using multiple medications for the last 18 years. Keeping in view her multiple health issues and current physical condition she is unfit for Govt. job. Therefore, she may be boarded out on medical grounds as she is permanently incapacitated.

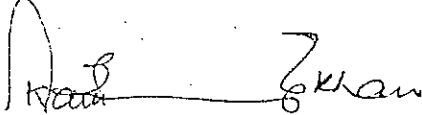
STATION PESHAWAR


DATED: 10/06/2020


(Dr. Fakhruddin)
Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital,
Peshawar.


(Dr. Naseer Ahmad)
Ophthalmologist
Police/Services Hospital,
Peshawar...Member...


(Dr. Asif Izhar)
Physician
Police/Services, Hospital
Peshawar. Member...


(Dr. Kamran Khan)
Orthopedic Surgeon
Standing Medical Board
Police/Services Hospital, Peshawar


(Dr. Niaz Muhammad)
DMS/Secretary
Standing Medical Board
Peshawar...Member...

Annexure "F"

19

ATTESTED



Handwritten signature and date: 5/10/20

Monday, 9 December, 2019

Dr. Habib Ahmed Jadoon

MBBS (FRESH), MRCP (UK), FRCP (London), AGAF (USA)
Gold Medalist, Ever Best Graduate (AMC)

Consultant Physician Gastroenterologist, Hepatologist

Medical Director Orsh General Hospital Abbottabad.
Formerly Consultant Physician and Associate Professor
of Medicine, Ayub Medical College and Teaching Hospital,
Abbottabad.

Fellow American Gastroenterology Association
Member American Association For Study of Liver Diseases
Member American Society For Gastrointestinal Endoscopy

Clinic: Orsh General Hospital, Mansehra Road,
Mandian, Abbottabad.

Reception Phone: (0992) 412615

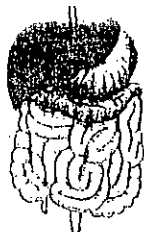
Cell: 0314-9948832

E-mail: drhabiborush@hotmail.com

Diagnostic and therapeutic, upper and lower GI endoscopic
services available by appointment.

Consultation by appointment.

PMDC #: 4913-F



ڈاکٹر حبیب احمد جادون

ایم بی بی ایس (فریش)، ایم آر سی پی (لندن)، ایم جی ایف (یو ایس اے)
گولڈ میڈلسٹ، ایور بیسٹ گریجویٹ (ایم سی)

کونسلنٹ فزیشن گیسٹرو انٹیسٹینال، ہیپاٹالوجسٹ

فارمرلی کونسلنٹ فزیشن اینڈ ایسوسی ایٹ پروفیسر

آف میڈیسن، ایوب میڈیکل کالج اور ٹیچنگ ہسپتال،

آبٹوٹ آباد۔

فیلو امریکن گیسٹرو انٹیسٹینال ایسوسی ایشن

ممبر امریکن ایسوسی ایشن فار اسٹڈی آف لیور ڈیزیز

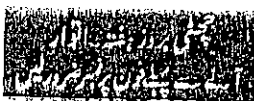
ممبر امریکن سوسائٹی فار گیسٹرو انٹیسٹینل اینڈ

اینڈوسکوپک سروسز ایویلیبل بای اپوائنٹمنٹ۔

فون: (0992) 412615

موبائل: 0314-9948832

صرف نمبر دیا ہے، ہر بھیجے جانے والے پیکٹ کے ساتھ ہے۔



Mrs Rafi Ud Din

MR#: 31754

Visit #: 1

Age: 50 yrs

Temp: C

HR:

MANDIAN

Pulse: 76 /min

Wt: 78 Kgs

BP: 140/70 mmHg

1. RIFAXA(Rifaximin) 550 mg tab

2. FLORAMEX -IMMODIUM-LOPRAMEX (Loperamide) 2 mg; stop if
constipated

3. SPASMOMEN (otilonium bromide) 40 mg tab: 20 minutes before meals
thrice daily.

4. REPAR 20 mg.

5. after 4 month

6. ZEEMOX/ospamox (amoxicillin) 1 gm tab:

7. MEPZAN (emeprazole) 20 mg

8. MEDAC 250 mg:

Dr. Habib Jadoon

Handwritten signature: Dr. Habib Jadoon

Handwritten text at the bottom right.

Handwritten text at the bottom left.

Amman

دعوت

ACCURATE LABORATORY



Crush General Hospital, Mansehra Road Abbottabad
Phone: (0992) 380959, Mob: 0331-8007464

(HRA/500/R AD/11/13)



Lab#	25-9-12-2019	Mr#	31764
Name	Mrs Rafi Ud Din	Referred By	Dr Habib Ahmed Jadoon
Age	50	Sample Source	Inside
Gender	Female	Test Date	Monday, Dec 9, 2019 12:39 pm

THYROID FUNCTION TESTS

TSH	1.56	uIU/ml	0.27-4.20
-----	------	--------	-----------

CRP			
C-reactive Protein	6.2	mg/l	< 0.6

HELYORI

Helicobacter Ab	POSITIVE	Negative
-----------------	-----------------	----------

Verified By

Dr Touqeer Iqbal
M.B.B.S, MPhil Bio Chemistry

22



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospital Ltd.

Sector : H-8/4, Islamabad - Pakistan
Ph : 051-8463000
Fax : 051-863182

Dr. Sohail Naseem

MBBS, FCCP(USA), FCCM(USA)
Diplomate American Board of Internal Medicine
Diplomate American Board of Pulmonary & Critical Care
Consultant Pulmonologist & Critical Care
Director Shifa Sleep Disorder center

Mrs. Iqbal Jan 50y 11m Female

MR No 19-13-42-09



December 26, 2019

Weight 78 Kg Allergy NKDA

Complaints :
subcostal pain

Signs :

BP: 130/70
Weight: 78
Height: 159
Temp: 36
RR: 20
Pulse: 70
SpO2: 94 %
Pain Scale: 2
Fall risk: N

Clinical Details:

no sig cough

Plan:

chest pain
cxr

Rx

1 Disc SERETIDE (DISKUS) 50/500 550 MCG
12 Hourly (Two times a day) For 2 Weeks(s)

2 Tablet MYTEKA 10 MG
(1 Tab/s) orally Once Daily For 2 Weeks(s)

3. Combichale Solus

1 + 1 + 1

4. Tab Dostalgen

1 + 1

1 + 1

پریا شدہ برادر کم مشورہ کے لئے ذرا سی پی ایم، ہسپتال شفا

Signed electronically by Dr. Sohail Naseem on above date.

Physician's Signature



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-8463642, 8463454

Fax : 051-4863182

Dr. Farzana Shafiqat

MBBS, FACP, FCPS (Medicine)

FCPS (Gastroenterology)

Consultant Gastroenterologist and Hepatologist

19-13-42-09

DR IQBAL JANI



(F) 81/81/1969 (51Y6790)

26/12/19

2 H. pylori
positive

Had one episode
of a month
of improvement

2 Duodenal
ulcer
EGD referred

4% atrophy

Capri Riseb soap
2x daily (morning & evening) 1-1-1
2x mouth
obv

Capri Riseb soap, Then 1x OD
2x mouth
obv

Capri Ranxil soap
2x daily 2-2-2
27/12-31-12 then

Tab Ranxyn
2x daily 1-1-1
+ Tab Levoflox 500mg
2x daily 1-1-1

SHZ

EDGZ

2x daily
2x daily

Tab Gansone soap
1-1-1
Brymp Gansone
1-1-1

23



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-8463000, 8463078

Fax : 051-4863182

ENDOSCOPY

MR No..... 19134209
Patient..... DR IQBAL JANI
Age / Gender..... 51Y Female
Service Code..... 00741
Order By..... Dr. Nadeem Iqbal
Perform By..... Dr. Nadeem Iqbal
Procedure Date.... 04-01-2020
Printed On 04-01-2020 17:03

UPPER GI REPORT

Pre Diagnosis:
Epigastric pain.

Post Diagnosis:
See report below

Pre Medications

- 1. Inj Midazolam 2mg
- 2. Inj Nalbin 2mg

Esophagus

Normal upper, middle and lower esophagus.

Stomach

Moderate pangastritis. Marked atrophic gastritis in distal gastric body and antrum.

Duodenum

Normal D1 & D2.

Biopsy

Gastric antrum

Other

Complications

Nil

Blood Loss

None

Description

Conclusion

Moderate Pan gastritis. Atrophic gastritis in gastric antrum.

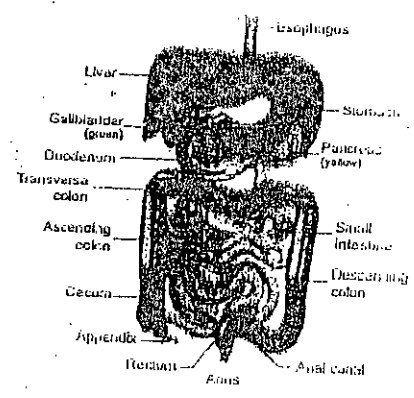
Discharge Medication

PPI.

Discharge Instructions

Physician Signature

Digestive System Diagram





شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistan

Tel: 051-8463000, 8463418

Fax: 051-4863182

3:00 PM

24

Dr. Aamna Batool Khan

Member of College of Physician and Surgeons (MCPS) - G. Medicine

Fellow of College of Physicians and Surgeons (FCPS) - Dermatology

Consultant Dermatology

19-13-42-09

Mrs. Gajal Jan

28/11/19

Adv

- Tab Fexet 120mg

1/1

- Tab Mytelka 50mg

1/1

- Tab Aterox 10mg

- Dermicare Lotion

کریڈیٹ

- Emulibizing Ointment

کریڈیٹ

- Clokerax Ointment 20gm

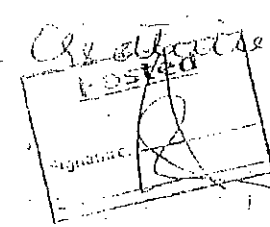
Liquid paraffin 40gm

Ret-jelly 40gm

کریڈیٹ

AM23
HMP
CP
CT

Inv.



Tab Vermox 171 3day

Dr. Aamna Batool Khan
Consultant Dermatology
Shifa International Hospitals Ltd.

25



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-8463000, 8463418

Fax : 051-4863182

Dr. Aamna Batool Khan

Member of College of Physician and Surgeons

(MCPS) - G. Medicine

Fellow of College of Physicians and Surgeons

(FCPS)-Dermatology

Consultant Dermatology

19-13-42-09

Mrs. Jabat dan

26/12/19

Adv

Tab Kestine 10 mg

ایگر مس 10

Dermisone 1000

ڈرمنسوں 1000

3ml

~~Glycerate Oratol~~

• Cure of Case -
Leprosy
Hidradenoma

Hydrocort Cream

ہائیڈروکورت کرائم

Emulifing Oratol

ایملیفنگ اورتول

Dr. Aamna Batool Khan
Consultant Dermatology
Shifa International Hospitals Ltd.
Sector: H-8/4, Islamabad - Pakistan

26)



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : II-8/4, Islamabad - Pakistan

Tel : 051-8463644, 8463695

Fax : 051-4863182

Dr. Nadeem Iqbal

MBBS, MFOP (Ireland)

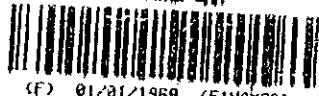
CSCST (GIM & Gastroenterology)

Fellowship in Advance Therapeutic Endoscopy, Canada

Associate Consultant Gastroenterologist

19-13-42-09

DR IQBAL JVI



(F) 01/01/1989 (51Y0130)

4/1/2020

- Tab - LOSEC 20mg

(4,6)

— 1+1

Tab
=
Ob 2

Colofac

— 1+1+1

Tab

Ob 2

hexopraid 25mg

— 1+1

Opus

27



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.
Sector : H-8/4, Islamabad - Pakistan
Tel : 051-8463644, 8463695
Fax : 051-4863182

Dr. Nadeem Iqbal

MBBS, MRCP (Ireland)
CSCST (GIM & Gastroenterology)
Fellowship in Advance Therapeutic Endoscopy, Canada
Associate Consultant Gastroenterologist

25 FEB 2020

Local - 20mg

لجے — گوی سزانی

Tab Colofac 135mg

3 — 1+1+1

Tab /B. Calm 1+1

3 —

Enteron — 1+1

5 —

Tab Lemporal 25g 1+1+1

3 —

Dr Nadeem Iqbal
MBBS MRCP (Ireland)
CSCST (GIM & Gastroenterology)
Associate Consultant Gastroenterologist
Shifa International Hospitals Ltd
Sector H-8/4, Islamabad-Pakistan

28

MBBS. MCPS (Pak). MRCP (UK). FRCP (Edin).

ڈاکٹر ایم شمیم انور
شفیق میڈیکل سینٹر
مندیال ایبٹ آباد



Shafiq Medical Centre
Mandiyaal

clinic:
shafiq medical centre
mandiyan. sets: 386867.

Date: 8.5.03

Bad

bronchial asthma

150
100
100
100

Ventolin S2 - 4

Claval Forte

3 Puff BD

Butovent

2 Puffs - QID

Cicdexen 0.5 1

Xen Puff

Advised to
leave Abbotabad
for 20 days

29



Dr. Abdur-Rab Khan
MBBS, MCPS (PAK), DTM (Dublin)
DME (Ireland) MRCP, FRCP (UK)
Professor of Pulmonary Medicine
Ayub Medical College & Teaching Hospital
Mansehra Road, Abbottabad

Clinic with Bronchoscopy
& Lung function tests facility

Mr. Rafood, Sir
10/1/14

D.O. 3/1/14

Life Digestive

WS 144

WS 141

mytelca - long list

34

2

Facility identification															
Serial Number	Country	Province	District	Territory	Town	Facility Type (Please Select one)	Managing Type (Please Select one)	Name of the Facility	Name of Head of the Facility	Contact Number	Email	Name of the Data collector	Contact Number	Email	Date of Data Collection
1.	Pakistan	KPK	ATD	ATD	Shewan	R.H.C		R.H.C Shewan	Dr. Iqbal Javeed	03219954188		Dr. Khizma	03329255493		27.8.20
												Hassan Zigg	0331-5525885		
												Imtiyaz	0345-9563556		

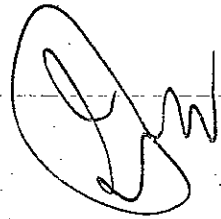
Dr. Fatima 169 B F Road, Com.

27.08.20

35

2

Basic Information										
Serial Number	Total Bed Capacity	ICU Beds	HDU Beds	Designated Covid Beds	Number of Ambulances		Generator		UPS	
					BLS	ALS	Number	Total Capacity (kVA)	Number	Total Capacity (kVA)
1.	13 beds available As R.H.C building is under construction so NO space available.	Nil	Nil	Nil	01	Nil	01	PS-3000.PS Functional. (220V)	-	Nil
							02.	SE-2500A Non Functional. (220V)		

 27-08-20

(36)

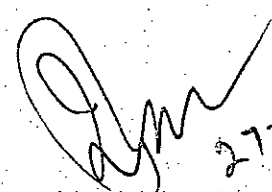
Equipment Data																			
Suction		Respiratory				Flowable Airways		Patient Ventilator			X-ray		CT			Ultrasound		APR	
Type (Please Select One)	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional	Type (Please Select One)	Number	Type (Please Select One)	Functional	Non-Functional	Generator Output (W)	Functional	Non-Functional	Number of Slices	Functional	Non-Functional	Functional	Non-Functional	Functional
NIL			NIL			NIL		NIL			NIL						NA		Available

L

[Signature]
27-08-2020

37

Equipment Data																		
OT Table			Heart Lung Machine		Infuse Pump			Defibrillator		Dialysis		Chemistry Analyzer			Immuno Analyzer		PCR	
Non-Functional	Non-Functional	Non-Functional	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional	Functional	Non-Functional	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional	Functional	Non-Functional	Functional	Non-Functional
NA	NA	NA	NA	NA	NA			01		NA			01		NA			NA


27-08-2020

Maintenance Details

Serial Number	Number of Biomedical Maintenance Staff	Names	Qualifications	Are they trained on any equipment (Yes/No)	Name of the equipment personnel is trained on	Reasons for nonfunctional Equipment (highlight reasons)
1.	NA	—	—	—	NIL	Shortage of HR <input checked="" type="checkbox"/> Shortage of Funds <input checked="" type="checkbox"/> No Spare Parts No training <input checked="" type="checkbox"/> No consumable <input checked="" type="checkbox"/> Not installed <input checked="" type="checkbox"/> No maintenance contract
						Shortage of HR Shortage of Funds No Spare Parts No training No consumable Not installed No maintenance contract
						Shortage of HR Shortage of Funds No Spare Parts No training No consumable Not installed No maintenance contract

[Signature]
27/8/20

39

Oxygen Systems																			
Availability of Medical Gas Pipeline (Yes/No)	Cylinder				Flowmeter			Oxygen Concentrator			Total Number of Beds with Oxygen Outlets	Total Number of cylinders in Oxygen Manifold	Bulk Oxygen			Pressure swing absorption (PSA) Plant			
	Yes/No (Please Select one)	Number of Functional	Number of Non-Functional	No. of cylinders used per Week	Flowrate (Please Select one)	Number of Functional	Number of Non-Functional	Flowrate (Please Select one)	Number of Functional	Number of Non-Functional			Yes/No	Capacity, if Yes	How many times is it refilled per week	Yes/No	Connected to the central pipeline (Yes/No)	Functional (Yes/No)	Cylinder filled per week Type (Please Select one)
NO	200 bars	01	01	—	01	Nil	—	01	Nil	—	Nil	Nil	Nil	—	—	—	Nil	—	Nil

[Signature]
27/08/20

Equipment Data

Item Number	Face Chamber			Mouth Guard / Mouthpiece Device			Bottle and Cap			High Flow Nasal Cannula			Resuscitation Bag & Mask			Pulse Oximetry		
	Type (Please Select One)	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional	Type (Please Select One)	Functional	Non-Functional
	Nil			Nil			Nil			Nil						02 Adult		Nil
																02 Neonate		

[Signature]
27/09/20

41

3

Office of In charge,

RHC Sherwan.

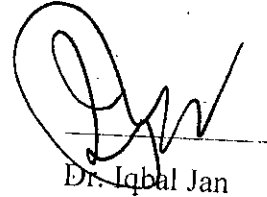
No: 598F Date: 31.8.20

The District Health Officer,
District Abbottabad.

Subject: Installation of Dental Unit

Reference: T/O No. 32 PF Dated: 28-05-2020

It is submitted that dental surgeon approached several times for installation of dental unit to yours office but the qualified person has not yet carried out desired job. Construction work in RHC is in progress. However, it is requested to depute technical hand person for installation of dental unit temporarily so that some basic facility to locals could be provided.



Dr. Iqbal Jan

In charge

RHC, Sherwan

Copy to:

Dr. Khadija D/S RHC with the direction to pursue in the O/O DHO Abbottabad for installation of dental unit.

Dr. Iqbal Jan

In charge

RHC, Sherwan.

42

5

Office of In charge,

RHC Sherwan.

No: 64PR Date: 8.9.20

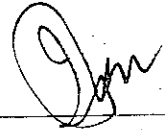
The District Health Officer,
Dist. Abbottabad.

Subject: Outstanding WAPDA Bills

Reference: Registered WAPDA bills Dated: 26-08-2020

It is submitted that outstanding WAPDA dues of RHC Sherwan amounting to Rs. 23000 (approx.) have not yet been paid since last 4-5 months. These bills were regularly received by staff of DHO Office but not accounted for.

It is therefore requested to arrange clearance of WAPDA dues as WAPDA staff visited several times in RHC Sherwan to disconnect electric connection. Action of WAPDA may cause loss to "vaccines" stored in the unit.



Dr. Iqbal Jan

In charge,

RHC, Sherwan.

Annexure "H1" 43

Office of In charge,

RHC Sherwan.

ATTESTED

No: ~~42~~ PF Date: ~~15~~ 03-07-2020

39.PF

The Director General

Health Services

Govt. of Khyber Pakhtunkhwa, Peshawar.

B
S/110/20

Subject: Appeal against Decision of Standing Medical Board (SMB)

Sir,

It is submitted in yours kind honor that:

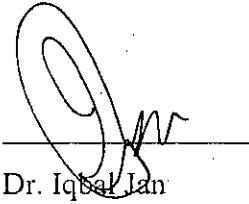
- i. I was suffering with severe gastritis and acute exacerbation of Asthma from the month of December, 2019 to March, 2020.
- ii. I went through specialized treatment during the period. (Annex-A)
- iii. In the meanwhile, undersigned applied for medical board vide this Office No: 16/PF Dated: 09-03-2020 and appeared before the SMB after lapse of sufficient time i.e. 10-06-2020 as informed by the O/O DHO Abbottabad vide his No: 109506 Dated: 02-06-2020 (Annex-B)
- iv. I was not informed about the status of SM Board proceedings during the period and most probably Honorable Board members decided the issue based on the record submitted to them along with application Dated: 09-03-2020.
- v. Instantly, undersigned received a letter No: 1909/ESI/DGHS Dated: 29-06-2020 addressed to yours kind office for retirement with copy to undersigned from the DHO office Abbottabad. The decision of Standing Medical Board was informed without any report from the quarter concerned. In the letter, my retirement was recommended to the competent authority on medical grounds. (Annex-C)
- vi. During the time after March 2020, undersigned performed the Govt. duty even under strong threat of Covid-19 and served the community with great zeal and interest.
- vii. Secretary to Govt. of KPK Relief, Rehabilitation and Settlement Department issued several notifications for exemption in performing duties above age 50 or those having respiratory

issues but in spite of that, under the emergency situation, undersigned performed the duty for sake of humanity. (Annex-D)

viii. Currently, after going through specialized treatment, undersigned is feeling quite better and can continue the Govt. service without any health hazard.

It is therefore requested to seize the implementation impact of Standing Medical Board report. It is also requested for referring back my medical report to SMB for re-consideration/re-evaluation to avoid future complication.

Undersigned is performing Govt. duty till decision in the best public interest.



Dr. Iqbal Jan

PWMO

RHC, Sherwan

45

Office of In charge,

RHC Sherwan.

No: 39.PF Date: 03.07.2020

The Director General
Health Services
Govt. of Khyber Pakhtunkhwa, Peshwar.

41

36/27
07/7/???

Subject: Appeal against Decision of Standard Medical Board (SMB)

Title: Appeal

S.S.

It is submitted in yours kind honor that.

- i I was suffering with severe gastritis and acute exacerbation of Asthma from the month of December, 2019 to March, 2020.
- ii I went through specialized treatment during the period (Annex-A)
- iii In the meanwhile, undersigned applied for medical board vide this Office No: 16/PF Dated: 09-03-2020 and appeared before the SMB after lapse of sufficient time i.e 10-06-2020 as informed by the CCO DHO Abbottabad vide his No: 109506 Dated: 02-06-2020 (Annex-B)
- iv I was not informed about the status of SM Board proceedings during the period and most probably Honorable Board members decided the issue based on the record submitted to them along with application Dated: 09-03-2020.
- v Instantly, undersigned received a letter No: 1909/ESUDGHS Dated: 29-06-2020 addressed to yours kind office for retirement with copy to undersigned from the DHO office Abbottabad. The decision of standard Medical Board was informed without any report from the quarter concerned. In the letter, my retirement was recommended to the competent authority on medical grounds. (Annex-C)
- vi During the time after March 2020, undersigned performed the Govt duty even under strong threat of Covid-19 and served the community with great zeal and interest.
- vii Secretary to Govt of KPK Relief, Rehabilitation and Settlement Department issued several notifications for exemption in performing duties above age 50 or those having respiratory



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-8463000

Fax : 051-4863182

46

AMRESURE
"I"

ATTESTED

Islamabad
5/10/20

MEDICAL CERTIFICATE

19-13-42-09

DR IQBAL JAN

Patient's Name _____



M.R. No _____

(F) 01/01/1969 (51Y8M3D)

The patient identified above was treated at Shifa International Hospital as:

Outpatient on 04/09/2020

Inpatient (Date of Admission _____ Date of Discharge _____)

He/She was treated for Chronic Diarrhoea.
(Diagnosis)

Operations, if any _____

It will be necessary for the patient to remain out of work for _____, w.e.f. : _____
(Time period)

He/She should be able to return to work/school on _____
(Date)

Comments: _____

DR. NADEEM IQBAL
Associate Consultant Gastroenterologist
ID # 1VB

Physician's Name

Signature

04/09/20
Date



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-8463000

Fax : 051-4863182

47

Handwritten notes in Urdu, possibly indicating a date or patient status.

MEDICAL CERTIFICATE

19-13-42-09

DR IQBAL JAN

Patient's Name _____



M.R. No. _____

(F) 01/01/1969 (51Y0M3D)

The patient identified above was treated at Shifa International Hospital as:

Outpatient on _____

Inpatient (Date of Admission _____ Date of Discharge _____)

He/She was treated for _____

Gastro Enteritis +

(Diagnosis)

Operations, if any _____

It will be necessary for the patient to remain out of work for _____

2 Weeks

w.e.f. _____

(Time period)

He/She should be able to return to work/school on _____

(Date)

Comments: _____

Dr Nadeem Iqbal

MBBS, MRCP (Ireland)
CSCST (GIM & Gastroenterology)
Associate Consultant Gastroenterologist
Shifa International Hospital Ltd.
Sector H-8/4, Islamabad-Pakistan

Physician's Name

Handwritten signature of Dr. Nadeem Iqbal

Signature

Date



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name E-Mail Address: dgk@khyber.gov.pk
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

OFFICE ORDER.

ATTESTE

The competent authority is pleased to nominate/relieve the following Principal Medical Officers DS-19 w.e.from 10.09.2020 to join the four months in-service training at Category A/Teaching DHQ Hospitals for their promotion to the post of Chief Medical Officer DS-20 against each their name:-

In case there is any error in place of posting/Training Centre, the same will be corrected on written request:-

S.NO.	NAME OF DOCTORS/ PLACE OF POSTING	PLACE OF POSTING	NAME OF INSTITUTIONS
1.	Dr. Muzen Begum D/O Wazir Ali, MBBS	PMO DHQH, Kohat	DGHQ Kohat
2.	Dr. Javed Shah, MBBS	KTH, Peshawar	KTH, Peshawar
3.	Dr. Muhammad Ajmal Khan s/o Muhammad Afzal Khan	At the disposal of DHO, DIKhan.	DHOH DIKhan
4.	Dr. Muhammad Khalid Khan s/o Abdul Hamid Khan.	PMO Serind Hosp: for Psy, Pesh (Mental)	City Hospital, Peshawar
5.	Dr. Humna Sherif, MBBS	PWMO LRH, Peshawar	LRH, Peshawar
6.	Dr. Shamim Afzal s/o Amir Afzal, MBBS	At to DHO, Munsheer	KATH, Munsheer
7.	Dr. Saifur Muhammad s/o Ali Muhammad Khan.	PMO CH Shokardara Kohat	DHOH Kohat
8.	Dr. Sajjad Muhammad s/o Ghulam Muhammad, MBBS	PMO DHQH Kohat	DHOH Kohat
9.	Dr. Nisar Muhammad s/o Mir Zaman, MBBS	PMO BKMC Mardan.	BKMC, Mardan
10.	Dr. Humayunullah s/o Hafiz Mubd Asub, MBBS	PMOESH, Hordaber, Peshawar.	City Hospital, Peshawar
11.	Dr. Zafar Ali Shah s/o Muhammad Amin Shah.	PMO DHO, Office, DIKhan	DHOH, DIKhan
12.	Dr. Sajjad Ahmad Malik s/o Mauld Iqbal Malik, MBBS	Attached to DHO Peshawar	City Hospital, Peshawar
13.	Dr. Abdur Rashid s/o Karim Khan, MBBS	PMO DHO, Office, DIKhan	DHOH, DIKhan
14.	Dr. Tojuf Haq s/o Shah Rasool, MBBS	PMO DHO, Office, Peshawar	City Hospital, Peshawar
15.	Dr. Dorre Afshan, MBBS	PMO ATH, Abbottabad	ATH Abbottabad
16.	Dr. Shahir Ahmad s/o Abdul Sattar, MBBS	PMO ID Children Hosp: Peshawar.	City Hospital, Peshawar
17.	Dr. Anaynullah s/o Daulat Khan, MBBS	PMO DHO, Office, Kohistan	SGTH, Swat
18.	Dr. Nasim Akhtar, MBBS	PWPMO DHQH, Charsadda	DHOH Charsadda
19.	Dr. Fauzin Shahzada, D/O Shahzada, MBBS	PMO DHQH Barkhele	DHOH Timergara.
20.	Dr. Ishtiaq Hajira, MBBS	SGTH Swat	SGTH Swat
21.	Dr. Muhammad Essa Khan s/o Shah Afzal, MBBS	PMO DHQH, Barkhele	DHOH, Timergara
22.	Dr. Jehanzeb s/o Shah Baroz Khan, MBBS	PMO DHQH, Minnowah	DHOH Danna
23.	Dr. Mir Alam Khan Afridi s/o Akbar Hussain Afridi, MBBS	PMOSGTH, Swat	SGTH Swat

Dr. Javed Shah
5/10/20

272	Dr. Saama Hanif Orakzai D/O M.S. Hanif Orakzai, MBBS	PMO ATH, Abbottabad	ATH Abbottabad
273	Dr. Nayyar Halimi D/O Tanzeemul Haq Halimi	PMO KTH, Peshawar	KTH Peshawar
274	Dr. Muhammad Younas Nadeem s/o Sikandar Khan	DHQB, Kohat	DHQB Kohat
275	Dr. Muhammad Sadiq s/o Saadullah Jan, MBBS	PMOTBC, N.W. Agency	DHQB Bannu
276	Dr. Sher Zaman s/o Haji Sherin Khan, MBBS	PMO MMC, Mardan	MMC Mardan
277	Dr. Farida Mujahid D/O Iqbal, MBBS	Sr. Demonstrator, KMC, Peshawar	KMC, Peshawar
278	Dr. Zubaida Khanum D/O Juma Khan, MBBS	PMO City hospital Lakki Marwat	DHQB Lakki
279	Dr. Farzana Ayub D/O Sahibzada Muid Ayub	PMO DHQB, Abbottabad	DHQB Abbottabad
280	Dr. Najma Sultana D/O Haibat Jehan, MBBS	PMO LRH, Peshawar	LRH Peshawar
281	Dr. Abdur Rehman s/o Akbar Jan, MBBS	PMO THQB, Thal, Hangu	DHQB Hangu
282	Dr. Iqbal Jan D/O Muhammad Yaqub, MBBS	PMO PHS, Abbottabad	DHQB Abbottabad
283	Dr. Sultan Bibi D/O S. Muhammad Zahir Shah	PMO DHQB, Abbottabad	DHQB Abbottabad
284	Dr. Muhammad Younas s/o Haji Subhan, MBBS	Attached to DHS, FATA	DHQB Bannu
285	Dr. Zulfiqar Ali s/o Shaukat Ali, MBBS	PMO Molvi Jee Hospital, Peshawar	City Hospital, Kohat Road, Peshawar
286	Dr. Noor Muhammad s/o Pahlawan Khan, MBBS	PMO CD Akhunabad, Peshawar	City Hospital, Kohat Road, Peshawar
287	Dr. Ijaz Hussain Zaidi s/o M. Mehmood Zaidi, MBBS	EPI Coordinator Peshawar	City Hospital, Kohat Road, Peshawar
288	Dr. Muhammad Saleem s/o Muhammad Amin, MBBS	PMO DHQB, Timergara	DHQB Timergara
289	Dr. Abdul Mujeeb s/o Abdul Waheed, MBBS	PMT, Abbottabad	DHQB Abbottabad
290	Dr. Iqbal Hussain s/o Musafir Khan, MBBS	City Hospital, Peshawar	City Hospital, Kohat Road, Peshawar
291	Dr. Arsalan Khan s/o Chakhal Khan, MBBS	PMO CH Shwa, NW, Miranshah	DHQB Bannu
292	Dr. Naz Muhammad s/o Yaqub Muhammad, MBBS	THQB, Lahore, Swabi	DHQB Swabi
293	Dr. Muhammad Anwar s/o Fazal Muhammad	GMIC, DI Khan	DHQB DI Khan
294	Dr. Ijaz Mehmood Khan s/o Raza Khan, MBBS	PMO, CH Duaba Hangu	DHQB Hangu
295	Dr. Hashim Ahmad s/o Shamsur Rehman, MBBS	PMO RHC, Manga, Mardan	DHQB Mardan
296	Dr. Salim Abbas s/o Hissamullah, MBBS	Demonstrator, KMC, Peshawar	KMC Peshawar
297	Dr. Muhammad Qamar s/o Firdaus, MBBS	PMO SMC, Swat	SGHH Swat
298	Dr. Akbar Khan s/o Fazal Manan, MBBS	PMOTQH, Ali Zai, Kurram	DHQB Hangu
299	Dr. Muhammad Yousof s/o Muhammad Sharif	PMO DHQB, Baskhela	DHQB Baskhela
300	Dr. Nasirullah s/o Rehmani Gul, MBBS	Attached to DHO, Peshawar	City Hospital, Kohat Road, Peshawar
301	Dr. Fazl Raziq Khan s/o Fazl Khaliq Khan, MD/K	PMO DHQB, Landikotal	City Hospital, Kohat Road, Peshawar
302	Dr. Fida Hussain s/o Khan Sadique, MBBS	PMO, DHQB, Charsadda	DHQB Charsadda

363	Dr. Saadullah Khan S O Ayub Khan	PMODHQH, Bannu	DHQH Bannu
364	Dr. Rabra Mehar Waheed D O Mehar Dil Khan	PMOESH, Gara Tajik Peshawar	City Hospital, Kohat Road, Peshawar
365	Dr. Haroon Nasir Khattak S O Rab Nawaz MBBS	RIIC, Karak.	DHQH Karak
366	Dr. Fazal Rehman S O Muhammad Amir Khan, MBBS MPH	Attached to DHO Charsadda	DHQH Charsadda
367	Dr. Yousaf Khan S O Said Rehma MBBS	ESH, Pabbi Nowshera.	DHQH Nowshera
368	Dr. Hamidullah S O Muhammad Salim	PMO DHO Nowshera.	DHQH Nowshera
369	Dr. Mustafa S O Behramand, MD	At eth disposal of EDO (H) Swat	SGTH Swat
370	Dr. Rizwanullah S O Amanullah Khan, MBBS	ADG, DGHS, Office, Peshawar	City Hospital, Kohat Road, Peshawar
371	Dr. Zafar Iqbal S O Muhammad Amin	S/O LRH Peshawar	LRH, Peshawar
372	Dr. Rafiullah S O Haji Khan Zada	PMO, ESH, Nahaqi, Peshawar	City Hospital, Kohat Road, Peshawar
373	Dr. Ali Shah S O Fazli Ghatoor	At the disposal of EDO (H) Charsadda	DHQH Charsadda

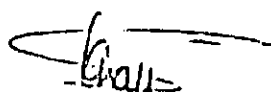
SI YAKKAWAKAY
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No 1527-110 A.E.L. Dated Peshawar the 04 / 09 / 2020

Copy forwarded to the -

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar.
2. Director General, PIISA, Peshawar.
3. Director Health Services Merge Area Peshawar
4. All Principals Medical Colleges in Khyber Pakhtunkhwa
5. All Hospitals Director MHI in Khyber Pakhtunkhwa.
6. All Medical Superintendents DHO Hospital in Khyber Pakhtunkhwa
7. All District Health Officers in Khyber Pakhtunkhwa

For information and necessary action


ADDITIONAL DIRECTOR GENERAL (HRM)
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

07/03/20

51

Annexure
"K"

Medical Superintendent

DHQ Hospital,

Abbottabad.

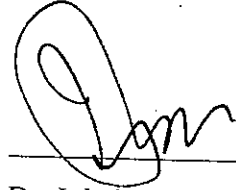
ATTESTED

B
38N2
5/10/20

Subject: Mandatory Training for Promotion

Undersigned nominated for practical training in DHQ Hospital Abbottabad vide DG Health Services No. 15017-110 Dated: 04-09-2020 @ S.No. 282 regarding subject training.

I hereby submit arrival report in DHQ Hospital Abbottabad for the said training today on 10-09-2020 (F.N) for further n/a please.



Dr. Iqbal Jan

10.09.2020

PMO

RHC, Sherwan.

Copy to:

1. PS to DG Health Services KPK Peshawar with reference to above order.

Dr. Iqbal Jan

In charge,

RHC, Sherwan.

52

Office of In charge,
RHC Sherwan.

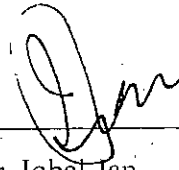
No: 6572 Date: 9.9.20

The District Health Officer,
Dist. Abbottabad.

Subject: Mandatory Training for Promotion

It is submitted that undersigned has been nominated for "Practical Training" vide DG Health Services KPK Peshawar No. 15017-110 Dated: 04-09-2020 in DHQ Hospital Abbottabad and will join it for 04 months w-e-f 10-09-2020. Dr. Abrar MO has been asked to look after routine matters of RHC Sherwan in the public interest.

Report is hereby submitted for yours kind information.



Dr. Iqbal Jan
In charge,
RHC, Sherwan.

Recd
on
9.9.2020
2:25 PM
Record Section
DHO office

53

No: 65PR Dated: 19.9.20

The Medical Superintendent,
BBS Teaching Hospital,
Abbottabad.

Subject: Mandatory Training for Promotion

Appeal Reference: Yours Office No. 4878 Dated: 11-09-2020.

It is informed that undersigned was nominated for subject training by the competent authority vide DG Health Services KPK No. 15017-110/AEI Dated 04-09-2020 and submitted arrival report in DHQ Hospital Abbottabad accordingly.

Against the decision of SMB, undersigned submitted an appeal before the competent authority which was submitted to secretary to Govt. of KPK Health Department vide DG Health services No. 11467-68/EI Dated: 05-08-2020. I have performed regular duty after 10-06-2020 to 09-09-2020 (copy attached).

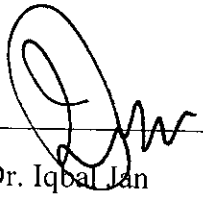
The decision of performing duty under the law of land will be decided by the competent authority i.e. Secretary Health Department KPK Peshawar.

It is therefore requested to provisionally allow the undersigned for training till decision of the appeal by the competent authority to avoid further complications at later stage.

Dr. Iqbal Jan
PWMO
Health Department.
Cell No: 0333-5039210

Copy to:

1. DHO Dist. Abbottabad.
2. PS to secretary Govt. of KPK Health Dept.
3. PS to DG Health Services KPK Peshawar.


Dr. Iqbal Jan
PWMO
Health Department.

وکالت نامہ

کورٹ فیس

بعدالت سر دس ڈیڑھ سو روپے

عنوان: ڈاکٹر امتیاز جان بنام حکومت KPK وٹیرنری

منجانب: ایس پی ایف
نوعیت مقدمہ: سر دس اسل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسے پیروی وجواب وہی کل کاروائی متعلقہ آں مقام سر دار سٹیٹ ایڈووکیٹ محمد ایڈووکیٹ کی کورٹ کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائرہ کرنے اور اس کے پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 5/10/20

بمقام: سٹیٹ اور

Accepted by

us

محمد ایڈووکیٹ

ڈاکٹر امتیاز جان

BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR

Dr. Iqbal Jan VERSUS Govt of KPK and others

**Subject: APPLICATION FOR EARLY HEARING AND FIXATION OF
CASE FOR TODAY.**

Respectfully Sheweth:-

Contents of application are as under:-

1. That above titled service appeal is going to be file today having interim relief with it.
2. That matter pertains to be an urgent nature upto the extent of interim relief.
3. That application is given in the interest of justice.

It is therefore, humbly prayed that on acceptance of this application the above titled appeal be fixed for today for interim relief.

Dr. Iqbal Jan

Through

Counsel

Sardar Basharat Khan

Advocate High Court Abbotabad

Basharat Khan
5/10/20

BEFORE THE HON'BLE SERVICE
TRIBUNAL, PESHAWAR

In S.A No. _____/2020

Dr. Iqbal Jan

.....Applicant

Versus

Government of Khyber Pakhtunkhwa

.....Respondent

APPLICATION FOR GRANT OF TEMPORARY
INJUNCTION / INTERIM RELIEF THAT
RESPONDENTS BE RESTRAINED FROM TAKING
ANY ADVERSE ACTION AGAINST THE PRESENT
APPLICANT / APPELLANT ON THE BASIS OF
PENDING PROCEEDING BEFORE THEM AND
BE DIRECTED TO PLACE THE APPLICANT /
APPELLANT ON HIS ACTUAL POSITION AND
RELEASE HER MONTHLY SALARY FROM 1ST
JULY 2020 TILL DATE.

Respectfully Sheweth,

1. That the above mentioned appeal is going to be filed before this Hon'ble Tribunal and this application be considered as an integral part of the instant appeal.

2. That applicant / appellant has a good prima facia case and balance of inconvenience tilt in favor of applicant / appellant, and in absence of status quo irreparable loss will be suffered by the applicant / appellant.

In these circumstance, it is humbly prayed on acceptance of this application, respondents be restrained from taking any adverse action against the present applicant / appellant on the basis of pending proceeding before them and be directed to place the applicant / appellant on his actual position and release her monthly salary from 1st July 2020 till date.

Dated: 06-10-2020

Applicant / Appellant

Through Counsel

Sardar Basharat Khan

&

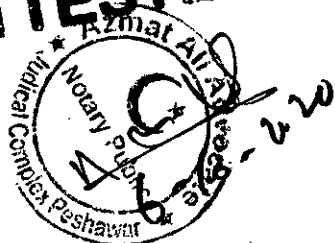
Waheed Jan Muhammad

Advocates, High Court Peshawar.

AFFIDAVIT

It hereby solemnly affirm that the contents of this application are true and correct and nothing has been concealed from this August Tribunal.

ATTESTED



DEPONENT

Through Counsel

[Handwritten signature]

BEFORE THE HON'BLE SERVICE
TRIBUNAL, PESHAWAR

In S.A No. _____/2020

Dr. Iqbal Jan

.....Applicant

Versus

Government of Khyber Pakhtunkhwa

.....Respondent

APPLICATION FOR GRANT OF TEMPORARY
INJUNCTION / INTERIM RELIEF THAT
RESPONDENTS BE RESTRAINED FROM TAKING
ANY ADVERSE ACTION AGAINST THE PRESENT
APPLICANT / APPELLANT ON THE BASIS OF
PENDING PROCEEDING BEFORE THEM AND
BE DIRECTED TO PLACE THE APPLICANT /
APPELLANT ON HIS ACTUAL POSITION AND
RELEASE HER MONTHLY SALARY FROM 1ST
JULY 2020 TILL DATE.

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Dated: 06-10-2020

Applicant / Appellant

Through Counsel

Sardar Basharat Khan
&

Waheed Jan Muhammad

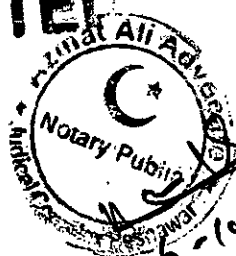
Advocates, High Court Peshawar.

Handwritten signature of Waheed Jan Muhammad

AFFIDAVIT

It hereby solemnly affirm that the contents of this application are true and correct and nothing has been concealed from this August Tribunal.

ATTESTED



DEPONENT

Through Counsel

Handwritten signature of Waheed Jan Muhammad