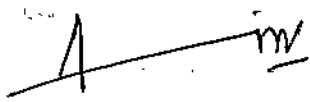


FORM OF ORDER SHEET

Court of _____

Case No. - _____ **164/2023**

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 19/1/2023 | <p>The appeal of Mr. Shah Faisal resubmitted today by Mr. Mian Muhammad Imran Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____, Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p> |

The appeal of Mr. Shah Faisal Ex-Farash Administration Department received today i.e. on 02.01.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Annexures of the appeal may be attested.
- 3- Page no.7 &13 are illegible which may be replaced by legible/better one.


No. 60/S.T.

Dt. 5/1/2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mian Muhammad Imran Adv. Pesh.

Respected Sir,
The deficiencies have been
rectified & re-submitted please


(Mian Muhammad
Imran
Adv)

BEFORE THE WORTHY KHYBER PAKHUTNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 164 /2023

**Shah Faisal (Ex- Farash) (BPS-01), Administration Department Civil Secretariat
Peshawar** **...Appellant**



VS

**Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat
Peshawar and others** **...Respondents**

INDEX

| <u>S.No</u> | <u>Documents</u> | <u>Flag</u> | <u>Page</u> |
|-------------|------------------------------------|-------------|-------------|
| 01. | Service Appeal | | 1-4 |
| 02. | Copy of Appointment Order | A | 5 |
| 03. | Copy of Arrival Report | B | 6 |
| 03. | Copy of Removal from Service Order | C | 7 |
| 04. | Copy of Departmental Appeal | D | 8-12 |
| 05. | Copy of Rejection Order | E | 13 |
| 06. | Copy of Medical Certificates | F | 14-38 |
| 07. | Wakalatnama | | 39 |
| | | | |

Through


Appellant

(Mian Muhammad Imran)
Advocate High Court
BC-13-4213
0333-9577770 0333-9274073

①

BEFORE THE WORTHY KHYBER PAKHUTNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 164 /2023

Shah Faisal (Ex- Farash) (BPS-01), Administration Department Civil Secretariat Peshawar

....Appellant

VS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar
2. Secretary to Government of Khyber Pakhtunkhwa, Administration Department Civil Secretariat Peshawar
3. Deputy Secretary (Admn), Administration Department, Civil Secretariat Peshawar
4. Comptroller, Pakhtunkhwa (Frontier) House, Islamabad

.....Respondents

APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED: 11/08/2022 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE FOLLOWED BY REJECTION OF HIS DEPARTMENTAL APPEAL VIDE LETTER DATED: 02/12/2022 & TO SET-ASIDE BOTH OF THE IMPUGNED ORDERS AND TO RE-INSTATE THE APPELLANT WITH ALL BACK BENEFITS

The Appellant is pleased to beseech before this Honorable Court as under;

1. That the Appellant was appointed as "Farash" (BPS-01) in the Administration Department, Civil Secretariat Peshawar by the competent authority vide Order Dated: 30/05/2014. (Copy of Appointment Order is attached as F/A)
2. That in fact, the Appellant was appointed on a vacant post of "Farash" (BPS-05) in the "Khyber Pakhtunkhwa House Islamabad".

3. That the Appellant submitted his arrival report on 06/06/2014 and started his duties with utmost zeal and zest with profound sedulous approach at "Pakhtunkhwa House, Islamabad". (Copy of Arrival Report is attached as F/B)
4. That the stroke of misfortune hit the Appellant when on 11/08/2022, he was removed from service based on the allegation of willful absence w.e.f 08/03/2022. (Copy of the Removal Order Dated: 11/08/2022 is attached as F/C)
5. That feeling aggrieved, the Appellant filed his departmental appeal on 13/09/2022 which was duly diarized with the department. Important is to submit that the Appellant has been communicated the same order on 31/08/2022. (Copy of Departmental Appeal is attached as F/D)
6. That on 02/12/2022, the Respondents were pleased to reject the departmental appeal of the Appellant and the major penalty of "Removal from Service" was upheld. (Copy of the Rejection Order is attached as F/E)
7. That the Appellant having no other remedy but to knock the door of this Honorable Tribunal on the following grounds *inter-alia*;

GROUNDS:

- A. That the act of the Respondents to impose major penalty of removal from service on the Appellant is illegal, unlawful and against the established law and rules.
- B. That the Appellant had informed his high-ups regarding the health issues of his mother and wife and in this regard, duly submitted application for the grant of leave and telephonically informed them as well.
- C. That it is intrinsic to submit before this Honorable Court that the mother of the undersigned is a chronic patient having severe spinal cord issue. True that she has been admitted in the hospital time and again and has gone through different surgeries/operation. Due to her dilapidated health conditions, she is unable to move and walk as well. Apart from it, it was the wife of the undersigned who tried to look-after his mother but

unfortunately, the wife has also faced great episode of mental and psychological problems. Due to these unavoidable situations, the Appellant preferred to look after his ailed mother and family. Similarly, the Appellant has got minor kids, which were also needed to be properly patronized. (Copy of Medical Documents is attached as F/F)

- D. That the impugned removal from service order is untenable in the eye of law because the government has been pleased to introduce Efficiency & Discipline Rules, 2011 which have provided a comprehensive modus for taking any disciplinary action against any Civil Servant. In the case in hand, the Appellant has been *pushed to the wall* without any *raison d'etre* and that is too, without following the mandate of law and relevant rules.

- E. That in fact, the removal from service is a harsh punishment as quantum of punishment is required to be commensurate with the allegation/charges against any person. The allegation qua absence from duties without prior permission and to extend such a harsh punishment of removal from service is required to be reviewed keeping in view the past extraordinary service record and about eight years of service.

- F. That no inquiry whatsoever has been carried out about the stance of the Appellant but with one stroke of pen, the Appellant has been removed from service which is absolutely not warranted in the eye of law.

- G. That the Appellant has got an old ailing mother, psychologically weakened wife and five minor kids, and being the only bread-earner for the family, the impugned order has caused detrimental influence on the entire family.

- H. That any other ground can be raised at the time of arguments.

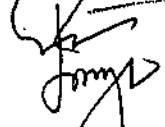
PRAYER:

In light of the foregoing submissions, it is therefore, most convivially and humbly prayed that on acceptance of the instant Service Appeal, this Honorable Tribunal may graciously be pleased to declare the impugned order of Removal from Service Dated: 11/08/2022 and rejection of departmental appeal Dated: 02/12/2022 as illegal, unlawful and of no legal effect & to set-aside both of the impugned orders & to re-instate the Appellant with all back-benefits

Any other relief may also be awarded in favor of the Appellant against the Respondents

Appellant 

Through


(Mian Muhammad Imran)
Advocate High Court
BC-13-4213
0333-9577770 0333-9274073



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

5

Dated Peshawar the 05-05-2014

ORDER

No.E&A(AD)04(01)/2012 . Under rule 10 sub rule-2 of the Khyber Pakhtunkhwa , Civil Servants (Appointment , Promotion and Transfer) Rules,1989, Mr. Shah Faisal s/o Gul Akbar Tehkal Bala, Tehsil & District Peshawar is hereby appointed as Farash (BPS-01) (4800-150-9300) against an existing vacancy in Pakhtunkhwa House, Islamabad with immediate effect on the following terms & conditions .

- a) He will get pay at the minimum of BS-01 including usual allowances as admissible under the rules. He will be entitled to annual increment as per existing policy.
- b) He shall be governed by the Khyber Pakhtunkhwa , Civil Servants Act,1973 and all the law applicable to the Civil Servants and Rules made there-under.
- c) He shall produce a Medical Fitness Certificate from Medical Superintendent, Services Hospital, Peshawar, before joining duties in the Civil Secretariat, as required under the rules.
- d) He has to join duties as his own expenses.
- e) He shall be on probation for a period of one(01) year extendable for further period of one year in terms of Notification No.SOR-IV/E&AD/1-3/2009/Vol : VIII , dated 16-12-2010 under Rule 5(1) of Khyber Pakhtunkhwa , Civil Servants (Appointment , Promotion and Transfer) Rules,1989.
- f) In case, he wishes to resign at any time, one month's notice shall be necessary or in lieu thereof one month's pay will be forfeited.

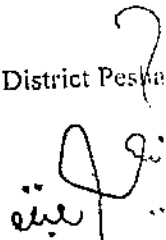
2- On acceptance of the offer on the laid down terms and conditions, he is required to report to Administration Department within 14 days.

DEPUTY SECRETARY (ADMN)

ENST OF EVEN NO & DATE.

Copy forwarded to the :-

- 1) Accountant General , Khyber Pakhtunkhwa
- 2) Mr. Shah Faisal s/o Gul Akbar Tehkal Bala, Tehsil & District Peshawar
- 3) Bill / Establishment Assistant E&A Department.
- 4) P/File.


(MAQBOOL HUSSAIN)
SECTION OFFICER(Admn)

6

To

The Comptroller,
Khyber Pakhtunkhwa House,
Islamabad.

Subject: ARRIVAL REPORT.

Sir,

In pursuance to Government of Khyber Pakhtunkhwa Administration Department Order No.E&A(AD)04(01)/2012, dated 30-05-2014, I hereby submit my arrival report for duty today on 06-06-2014(relevant documents enclosed).

Yours Faithfully,



(Shah Faisal)

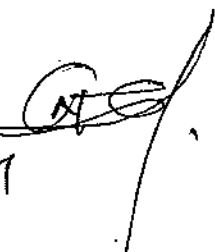
Farash

Pakhtunkhwa House Islamabad.

ENST OF EVEN NO & DATE.

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. PS to Secretary (Admn) Administration Department.
3. PA to Deputy Secretary (Admn), Administration Department.
4. Section Officer (Admn) Administration Department.

Retained 
6.6.2014

GOVERNMENT OF KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

Dated: 11-08-2022

7

ORDER

مذہب/مذہب/مذہب WHEREAS, Mr. Shah Faisal, Farash (BPS-03) S/O Gul Akbar, Khyber Pakhtunkhwa House, Islamabad (Administration Department) was proceeded against under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges of willful absence from official duty w.e.f 08-03-2022 till date without any formal approval and he was directed to explain his position vide letter dated 27-04-2022 but he has not responded.

2. AND WHEREAS, notices were served upon him in accordance with the procedure given under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 requiring him to resume duty within stipulated time, but he failed to comply.

3. AND WHEREAS, the final showcause notices were published in daily newspapers dated 12-06-2022 and 15-06-2022 directing him to join his duty and clear his position but again he failed to respond.

4. NOW, THEREFORE, the Competent Authority after having considered the evidence on record and exercising his powers under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, has been pleased to impose a major penalty of "Removal from Service" on Mr. Shah Faisal, Farash (BPS-03), Khyber Pakhtunkhwa House, Islamabad (Administration Department) with immediate effect.

DEPUTY SECRETARY (ADMIN)

ENCL OF EVEN NO & DATE

Copy forwarded to:-

- 1) The Accountant General, Khyber Pakhtunkhwa.
- 2) The Comptroller, Khyber Pakhtunkhwa House, Islamabad.
- 3) P.S to the Secretary Administration Department.
- 4) P.A to Additional Secretary -I, Administration Department.
- 5) The Supdt. (Accounts), Administration Department for necessary action.
- 6) P.A to Deputy Secretary (Admin), Administration Department.
- 7) Mr. Shah Faisal S/O Gul Akbar, Address: Akazai, Tehsil Bala, Post Office, Tehkata Bala, Peshawar, Contact: 0345-9167290.
- 8) Personal File
- 9) Master File


SECTION OFFICER (ADMIN)

2022

20/11

(8)

The Worthy Secretary,
Administration Department,
Civil Secretariat Behar

Subject: Departmental Appeal Under
Rule-17 of the KP (Efficiency &
Discipline) Rules, 2011 Read with
Rule-3 of KP Civil Servants
(Appeal) Rules, 1986 against
the impugned order dated: 11/8/22
whereby the Appellant has
been removed from service

Respected Sir,

With profound Veneration, it is
submitted that the Appellant was
appointed on 5/6/2014 as "Farash" (BP-3)
in the "Establishment & Administration
Department" by the competent authority.
Indispensable is to submit that since
inception of the services of the
Appellant, he has performed his
FTO

Duties with utmost zeal & zest & never ever intended to cause any issue or hardship for the high-ups.

The Appellant, being an employee of the department, performed his duties at "Pakhtunkhwa House, Islamabad" since initial days of his service.

Axiomatic is to submit that despite being appointed on the post of "Favazsh" he had, in fact, performed his duties in different spheres over there. He has performed as driver for protocol purposes, AC machine, plumber, electrician as well as computer networking etc. This aspect and facet regarding his service bespeaks qua his ability and professionalism. Hence, he has served as an all-rounder in the "KP House, Islamabad,

PTO

Regarding the issue of allegations of
 willful absence, it is added that
 the Appellant remained on leave
 with proper permission of the
 Competent Authority available at
 "K P House, Islamabad". The Competent
 Authority has been informed regarding
 the domestic problems as well as
 the deteriorated and dilapidated
 health condition of the mother of
 the Applicant. Give that the mother
 of the undersigned has gone through
 different treatment as she has got
 severe back-bone issue as she
 is absolutely unable to move, even
 she needs help for her need
 towards every day to day activities.
 She has even got surgery of
 her back-bone few years ago, which
 resulted in her inability to
 move & walk. The issue has again
 emerged which needed proper
 medical consultancy and assistance.

P.T.O

(B) (11)

↳ Apart from it, due to certain other domestic issues especially the mental and psychological health of the wife of undersigned, the aura and atmosphere of my house has remained badly perturbed. By understanding the gravity of situation & sensitivity of the matter, I preferred to look-after my mother, wife and five minor children. The undersigned telephonically informed the KP House:

Regarding the legal parameters of the issue in hand, the mandate of Rule-9 of "E&D Rules, 2011 provides that prior to finalizing proceedings, notices are required to be served upon the delinquent employer, and in fact, no notice has been received or even endorsed by the undersigned.

Regarding publication in the newspaper, legit is to submit that being an illiterate person, bother to read any newspaper is - a far-cry.

(PTO)

In light of the foregoing Submissions, it is, therefore, most humbly requested that on acceptance of the instant departmental appeal, the undersigned may kindly be reinstated into service and the impugned order Dated: 11/8/22 may kindly be set-aside please.

I shall be thankful.

Yours Sincerely
 12/9/22
 (Shah Farazul)
 Farazul - BPS(3)
 KP House, Islamabad
 12/9/2022

Note: The instant departmental appeal is received in within time as received the impugned order on 31/8/2022. Impugned order is attached.

Registered
GOVERNMENT OF KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

13

No. E&A(AD)21641/2014
Dated Peshawar the 02-12-2022

To

Mr. Shah Faisal S/O Gul Akbar.
Address: Akazai, Tehkal Bala. Post Office, Tehkula Bala.
Peshawar Contact: 0345-9 67790.

Subject: **DEPARTMENTAL APPEAL UNDER RULE-17 OF THE KP (E&D) RULES, 2011 READ WITH RULE-3 OF KP CIVIL SERVANTS (APPEAL) RULES, 1986 AGAINST THE IMPUGNED ORDER DATED:11-08-2022**

I am directed to refer to your application dated:12-09-2022 on the subject noted above and to state that the departmental appeal has been rejected by the competent authority by upholding the order of major penalty of "Removal from Service" bearing No. E&A(ADM).Bilal/NQ/PE, dated:11-08-2022.


SECTION OFFICER (ADMIN)

ENDST OF EVEN NO. AND DATE

Copy forwarded to:-

1. P.S to the Secretary, Administration Department.
2. P.A to Additional Secretary (Admin-I), Administration Department.
3. P.A to Deputy Secretary (Admin), Administration Department.


SECTION OFFICER (ADMIN)

HABIBA PHYSIOTHERAPY & REHABILITATION CLINIC

Dr. Rizwan Ullah PT
DPT (KMU)
MSPT KMU (Neurological Rehab)



Dr. Zia Ullah PT
DPT (KMU)
CLUB Foot Trained

14

Patient Name: Shamim Bibi Age 58 Sex F Date 27/3/2022

R/C
 LBP radiating
 to medial thigh
 knee pain (b/e)
 L/R
 Had spinal surge
 in 2012
 RTA 2 years
 back
 24 hours pain
 Can't walk indep-
 endently
 scoliosis
 towards (L)
 knee OA stage 2
 L/R
 B/E = Back tender-
 ness all around
 scoliosis, concavity
 D. toward (L)
 In prone
 tenderness on
 around the knee
 Patella
 are painful
 more stiffness

Tx Heating pad over
 knee (L) for 10 minute
 Exercises to encounter
 scoliosis
 Stretching of calf
 and hamstring
 Home exercise plan
 Postural education



Not Valid For Court

Handwritten notes:
 b/s
 1/2
 2/3
 3/4
 4/5
 5/6
 6/7
 7/8
 8/9
 9/10
 10/11
 11/12
 12/13
 13/14
 14/15
 15/16
 16/17
 17/18
 18/19
 19/20
 20/21
 21/22
 22/23
 23/24
 24/25
 25/26
 26/27
 27/28
 28/29
 29/30
 30/31
 31/32
 32/33
 33/34
 34/35
 35/36
 36/37
 37/38
 38/39
 39/40
 40/41
 41/42
 42/43
 43/44
 44/45
 45/46
 46/47
 47/48
 48/49
 49/50
 50/51
 51/52
 52/53
 53/54
 54/55
 55/56
 56/57
 57/58
 58/59
 59/60
 60/61
 61/62
 62/63
 63/64
 64/65
 65/66
 66/67
 67/68
 68/69
 69/70
 70/71
 71/72
 72/73
 73/74
 74/75
 75/76
 76/77
 77/78
 78/79
 79/80
 80/81
 81/82
 82/83
 83/84
 84/85
 85/86
 86/87
 87/88
 88/89
 89/90
 90/91
 91/92
 92/93
 93/94
 94/95
 95/96
 96/97
 97/98
 98/99
 99/100

HIP / KNEE - 25 Strengthening Terminal Knee Extension
 (Side-Lying)

Tighten muscles on front of left thigh then lift leg
 _____ inches from surface keeping knee locked
 Repeat _____ times per set Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 21 Strengthening Hip Abduction
 (Side-Lying)

Tighten muscles on front of left thigh then lift leg
 _____ inches from surface keeping knee locked
 Repeat _____ times per set Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 20 Strengthening Wall Slide

Keeping ankles steady lower buttocks and thighs are parallel to floor Hold _____ seconds
 Tighten thigh muscles and return
 Repeat _____ times per set
 Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 26 Strengthening Hip Abduction - Resisted

With band around ankles bring leg across body
 Repeat _____ times per set
 Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 27 Strengthening Hip Abduction - Resisted

With tubing around right leg other side toward anchor extend leg out from side
 Repeat _____ times per set
 Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 32 Stretching Inner Thigh / Groin

Place legs together and pull feet toward groin and stretch is felt in groin and inner thigh
 Hold _____ seconds
 Repeat _____ times per set
 Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 33 Stretching Piriformis

Place left leg over right thigh and place elbow over outside of knee Gently stretch buttock muscles as pushing bent knee across body Hold _____ seconds
 Repeat _____ times per set Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 36 Stretching Tensor

Cross right leg over the other then lean to same side until stretch is felt on other hip Hold _____ seconds
 Repeat _____ times per set
 Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 30 Stretching Hamstring (Standing)

Place right foot on stool slowly lean forward keeping back straight and stretch is felt in back of thigh
 Hold _____ seconds
 Repeat _____ times per set
 Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 34 Piriformis Knee Flexion

With band around left thigh gently pull knee up with inner foot stretch is felt Hold _____ seconds
 Repeat _____ times per set
 Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 40 Quad Set - Slight Flexion

Tense muscles on top of left thigh Hold _____ seconds
 Repeat _____ times per set Do _____ sets per session
 Do _____ sessions per day

HIP / KNEE - 35 Strengthening Hip Abductor - Resisted

With band looped around both legs above knees push thighs apart
 Repeat _____ times per set Do _____ sets per session
 Do _____ sessions per day

16

HIP / KNEE - 1 Self-Mobilization
Internal Rotation

With other leg flat on floor, move knee inward. Gently push knee inward. Hold _____ seconds.

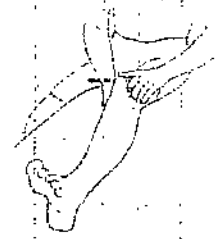
Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.



HIP / KNEE - 1 Self-Mobilization
External Rotation

With other leg flat on floor, move knee outward. Gently push knee outward toward other leg. Hold _____ seconds.

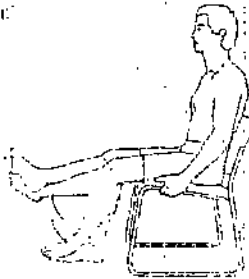
Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.



HIP / KNEE - 2 Self-Mobilization
Knee Flexion - Extension (Biting)

Gently push left leg back with other leg until a stretch is felt. Hold _____ seconds. Relax. Repeat with bent legs at ankles. Slowly straighten legs, pushing with lower leg. Hold _____ seconds.

Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.



HIP / KNEE - 2 Self-Mobilization
Knee Extension (Prone)



Using other leg, gently push left leg straight until a stretch is felt. Hold _____ seconds. Relax.

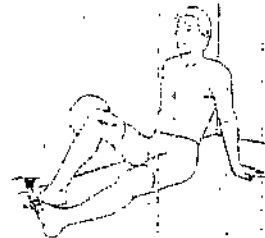
Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.

HIP / KNEE - 9 Self-Mobilization
Knee Flexion (Hook-Lying)



Hold left knee as far as possible, then use other leg to gently push until stretch is felt. Hold _____ seconds. Relax. Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.

HIP / KNEE - 10 Strengthening
Hip Abduction - Isometric



Using ball or rolled pillow, push outside of right knee into wall. Hold _____ seconds. Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.

HIP / KNEE - 13 Strengthening
Hip Adduction - Isometric

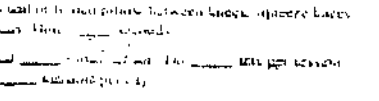
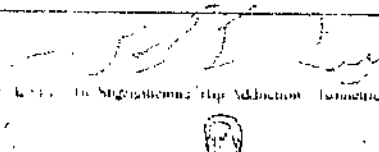


With left foot turned out, tighten muscles on back of thigh by pulling heel down onto surface. Hold _____ seconds. Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.

HIP / KNEE - 22 Strengthening
Hip Adduction (Side-Lying)



Tighten muscles on front of right thigh, then left leg _____ inches from surface, keeping knee locked. Repeat _____ times per set. Do _____ sets per session. Do _____ sessions per day.



17

HABIBA HOMOEOPATHIC HOSPITAL

Head Office: Habiba Homoeopathic Teaching Hospital & Research Center,
Sikandarpura Nishtarabad Chowk Opp. Public Health School Peshawar.
Mob: 0313-985111 - 0306-9851110

Patient Copy

535

Name: Shamim Bb Age 7 Sex F Date 27/1/22

| S.No | Description | Qty | Rate | Amount |
|------|-------------|-----|--------------|--------|
| 01 | Sciatica | 1 | 400 | |
| 02 | HHC-1 | 1 | | |
| 03 | 2 | | | |
| 04 | Arthrop | | | |
| 05 | Cal P | | | |
| 06 | L-2-P | | | |
| 07 | Cap. H | | 300 | |
| 08 | Fasto gel | | 175 | |
| 09 | | | | |
| 10 | | | | |
| 11 | | | | |
| | | | Total Amount | 2675 |
| | | | Discount | 575 |
| | | | Lab Amount | — |
| | | | Doctor Fees | — |
| | | | Total Amount | 2100 |
| | | | Received | ✓ |
| | | | Balance | — |

Counter Cashier Sign: [Signature] Disp/RD Sign: [Signature]

نوٹ: دوائی کی واپسی صرف 24 گھنٹے کے اندر ہوگی۔ (صرف میل بند بوتل)

HABIBA HOMEOPATHIC TEACHING HOSPITAL & RESEARCH CENTER

Name: Shamara Biba Age: 2 Sex: F Date: 27 Nov 2012

BP: _____
Temp: _____
Puls: _____
Height: _____
Weight: _____

Previous Clinical Record

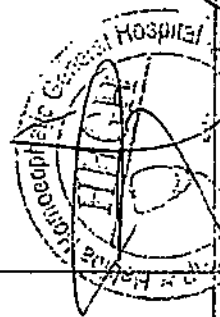
Amash pa AA Boster
Rungpa blubun

Present Clinical Record

Diagnoses

W.P.O
Frosty (J)

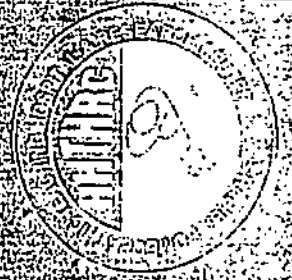
Saint O
Camm
Alkappa
Cap
Carl
Rantore
Passion
Estayand



18

Not Valid for Court

Habiba Homeopathic Teaching Hospital & Research Center, Sita, Habiba, West Nile State
Mistatashad-Chowk, Opp. Public Health School Fardaway
Contact #: 07190613985110 - 0306-9851110





OUTPATIENT DEPARTMENT (OPD)

19

Khyber Teaching Hospital
ORTHOPAEDIC - OPD
Medical Teaching Institution, Peshawar

Appointment Time : 09:09:00

M.R. No : K0300003256703

Name : Shamim Bibi

Gender : Female

Age : 66 Year(s)

Invoice # : K03225830160

Receipt # : K03222863143

Amount Paid : 20.00

Date : 29-NOV-22

Khyber Pakhtunkhwa - Pakistan

Complaints:

Ⓡ Shoulder

Findings:

Investigations:

May Ⓡ Shoulder AP lateral

Diagnosis:

Refer to physiotherapy

Refer to physiotherapy for
Frozen Shoulder / Adhesive Capsule

lab - (X-ray)

lab - Adh. caps

lab - Ⓡ Shoulder

15 days

1 month

Next Visit:

Consultant Name:

Signature:

5. Bad Shoulder Pain Since 6 months

12 of 11/11-18

20

T.R.

Passive ROM Exs $\xrightarrow{\text{Progress to}}$ Active ROM Exs

Inf. GHS guides & Distraction

Penicillin Exs

Wall Climbing

Corner Stretching

for 7 days

By

29-11-22

21

EMERGENCY DEPARTMENT

Teaching Hospital

Medical Section, Institution Peshawar, M.P.K.

M.R. No : K03ACE22574720

Invoice # : K03223634311

Name : Shamim Bibi

Clinic : CASUALTY

Gender : Female

Patient Type : ACUTE EMERGENCY

Age : 64 Year(s)

Date : 13-AUG-22 09:41:12

Operator: Atif Aziz

Complaints

Right shoulder pain
Cervical discomfort.

RX

Findings

Unable to completely
flex R Hand fingers

Rx

Tab Musnid
100 2x 1 1

Investigations

Right shoulder Appear
Cervical spine Appear

Tab vosen 50mg

100 1+1

Tab mecbalamim

Diagnosis

100 1+1

Referral

Complaint Name

Signature



OUTPATIENT DEPARTMENT (OPD)
MEDICAL TEACHING INSTITUTION PESHAWAR, KP
Hayatabad Medical Complex

23

[Handwritten signature]
Token# 252

Appointment Time : 12:07

ORTHOPEDIC-A - OPD

Snamim Bibi

58 Year(s)

Female

GHULAM ALI

Invoice # : K01223168853

K0100000885850

Serial # 731683

Amount Paid : 20'00

Print Date : 20-JUL-22 10:58:13

| | R | Remarks / |
|-------------------------|-----------------------------------|--|
| Presenting Complaints | <p><i>[Handwritten notes]</i></p> | |
| Past Medication History | <p><i>[Handwritten notes]</i></p> | |
| Investigations | <p><i>[Handwritten notes]</i></p> | |
| Diagnosis | <p><i>[Handwritten notes]</i></p> | <p>Stamp & Signature of prescriber <i>[Signature]</i></p> |

Reason For Referral

Stamp & Signature of prescriber

Page 1 of 1



SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KHYBER PAKHTUNKHWA
OPD REGISTRATION

158

25

Name _____ Age _____ Sex _____

Department _____ Address _____

Hospital Yearly No. _____ Dated _____

M/O TAHIR

63

FEMALE

History

R/-

GENERAL OPD

PESHAWAR

OA knee

(A)

142930-19

14-10-2019

Clinical Examination

Tos Acen
- 1H

Provisional Diagnosis

Tos Neer
- 1H

Investigations

Tos Bannal plus
- 1H
✓ Tos Cal-impl
- 1H

Physio

Doctor on Duty _____ Doctor's Signature _____

Sent To: _____

OUT DOOR PATIENT TICKET

DHIS - 02 (F)

District _____ CRP No: _____

Facility Name _____

Name _____ Age: _____ Sex: _____

Father's/Husband's Name _____

Monthly OPD Serial No. _____

Provisional Diagnosis: _____

26

| Date | Clinical Findings / Investigations / Treatment / Referred / Test Findings |
|------|---|
| | <p>im D46</p> <p>ONCE a week (4)</p> |
| 7d | <p>Tal. Movax 2</p> <p>121</p> |
| 7d | <p>Tal. Pen 100</p> <p>121</p> |
| 10d | <p>Tal. Mege 0</p> <p>121</p> |

DHISA
DISTRICT HEALTH
INFORMATION SYSTEM



10/0 J - dicit
21.9

27

| Biochemistry | | |
|------------------|--------|---------------------|
| TEST | Result | NORMAL RANGE |
| Glucose Fasting | | 70-110mg/dl |
| Glucose Random | | 60-250mg/dl |
| Blood Urea | | 40mg/dl |
| S. Creatinin | | 0.5-1.0mg/dl |
| S. Uric Acid | 3.5 | M 2.0-7.0 F 2.0-6.0 |
| S. Cholesterol | | 150-250mg/dl |
| Triglyceride | | 100-150mg/dl |
| Total Bilirubin | | up to 1mg/dl |
| ALP (SGPT) | | up to 40U/L |
| Alk. Phosphatase | | |

HAEMATOLOGY

| TEST | RESULT | NORMAL |
|-----------------------------|--------|----------------------------|
| Hemoglobin | | F 12-14, M 14-18 |
| H.C Count | | 4-5.5 million |
| W.C Count | | 4000-11000/mm ³ |
| W.S.R | 0.5 | 40-110mm |
| Neutrophils | | 45-75% |
| Lymphocytes | | 20-45% |
| Eosinophils | | 01-05% |
| Monocyte | | 01-04% |
| Basophils | | 0-01% |
| Platelet Count | | 1.5-4.5 million |
| Prothrombin Time | | 11-14 min |
| Partial Thromboplastin Time | | 30-40 sec |

URINE ANALYSIS

- Glucose _____
- Albumin _____
- Sp. Gravity _____
- Ph. _____
- Bile Salt _____
- Bile Pigment _____

MICROSCOPIC EXAMINATION

- Pus Cells _____
- red Cells _____
- Epith Cells _____
- Casts _____
- Crystals _____
- Others _____

W.D.L.
W.D.L.
W.D.L.
W.D.L.

Sent To: _____

OUT DOOR PATIENT TICKET

DHIS - 02 (F)

28

District _____ CRP No: _____


Facility Name _____

Name _____ Age: _____ Sex: _____

Father's/Husband's Name _____

Monthly OPD Serial No. _____

Provisional Diagnosis: _____

| Date | Clinical Findings / Investigations / Treatment / Referred / Test Findings |
|------|--|
| | <p>  - Tub. Caplam (500) (2/3) 1+1 - Tub. Mabir (500/500) (2/1) 1+1 - کور - ویش - کای ویش / کای ویش / کای ویش </p> |



W/O [Signature]
14.5

29

| Need for... | |
|-------------|-----|
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |

II. FUNDING

| | |
|-----|-----|
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |

| | |
|-----|-----|
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |

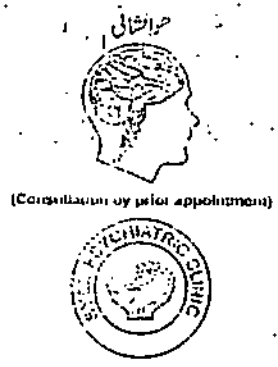
[Handwritten mark]

| | |
|-----|-----|
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |
| ... | ... |

SAVED PSYCHIATRIC HOSPITAL

30

PROFESSOR
Dr. Sayed Mohammad Sultan
 M.R.C. (Psyche) England F.R.C. (Psyche)
 Psychiatrist & Family Therapist
 D.M.S. (Punjab) M.C.P.S. (Pakistan)
 C.C.E. Institute of Psychiatry (London)
 The Bethlem Royal Hospital & The Maudsley Hospital
 & Kings College Hospital London
 Former Chairman Deptt. Of Psychiatry R.I.R.
 Former DEAR (Faculty of Psychiatry)
 College of Physicians & Surgeons Pakistan.
 Former President SAARC Psychiatric Federation
 Former President Pakistan Psychiatric Society.



Dr. Muhammad Ali Sultan
 M.B.S.S., M.C.P.S.
Miss. Kulsoom Bangash
 M.Sc., PMDCP
 M. Phil (Psychology) Psychologist
Miss. Hafsa Shah Psychologist
 M. Sc. (Psychology) Psychotherapist

Consultant Sayed Psychiatric Hospital
 2.9.2022

- ① Tab Estar 20mg
 1/2 x 4 x 1/2 x 1/2
- ② Tab Essorval
 1/2 x 1/2 x 1/2
- ③ Tab Inderal 40mg
 1/2 x 1/2 x 1/2
- ④ Tab Dlipass 5mg
 1/2 x 1/2
- ⑤ Tab Neudeml 1mg
 1 x 1 x 1

Smully

SAVED PSYCHIATRIC HOSPITAL
 010105-510971000
 0911-573511511

سید محمد علی سلطان ہسپتال عقار آباد نزدیکی آر بی سٹیشن تھکال پانڈا لویہ روڈ شیڈ

31

Age: 35 yrs

↑
visit Home

TD = 1st 7th
PD = " "

- Heaviness on Head ↑
- Headache
- Nausea
- Gr. Body Aches
- Agitation
- Low Mood +
- Irritability
- Anhedonia
- Aggressive Bel
- Noise Intolerance
- Tension/Worrying
- Sleep disturbed
- Sore Mouth
- Lack of Energy
- Fatigue

Drug Hx + Ix
Heroin

(Diagnosed in Test)
Result

(Dep⁺)

Post Ho
NAD

Family H
B
S
in Fam

Person
Mama

3 ♂
5 ♀

DLAS, H

R1

Pulse

→ 98.6



| | | | |
|--------------|---------------------------------|------|------------|
| Patient Name | Naila Bibi | Date | 02/09/2022 |
| Referred by: | Prof, Dr. Sayed Muhammad Sultan | | |

BLOOD CHEMISTRY

| Test | Result | Units | Normal Value |
|-----------------|--------|-------|--------------|
| Bilirubin Total | 0.6 | Mg/dl | Up to 1.0. |
| ALT (GPT) | 18 | U/L | 10—45 |
| Blood Urea | 34 | Mg/dl | 15—50 |
| Creatinine | 0.8 | Mg/dl | 0.5—1.5 |
| Calcium | 8.9 | Mg/dl | 8.5—10.5 |

Uric Acid

4.4

mg/dl

Male: 3.4 to 7.0

Female: 2.4 to 5.7

e

Lab Incharge



SAYED PSYCHIATRIC HOSPITAL

33

EEG

Patient Name; naila bibi

Gender : female

Age: 33 Years

EEG ID: 5

SPC—e:00000

Patient Code: SPC NO.00000000

EEG: EEG NO-0000000

Ref By: Prof. Dr. Syed Muhammad Sultan

Adress: Ghafar Abad Near Sheraz Restaurant

Tehkal University Road Peshawar.

MOBILE NO. 0305 -5199763

Phone NO. 091-5851551

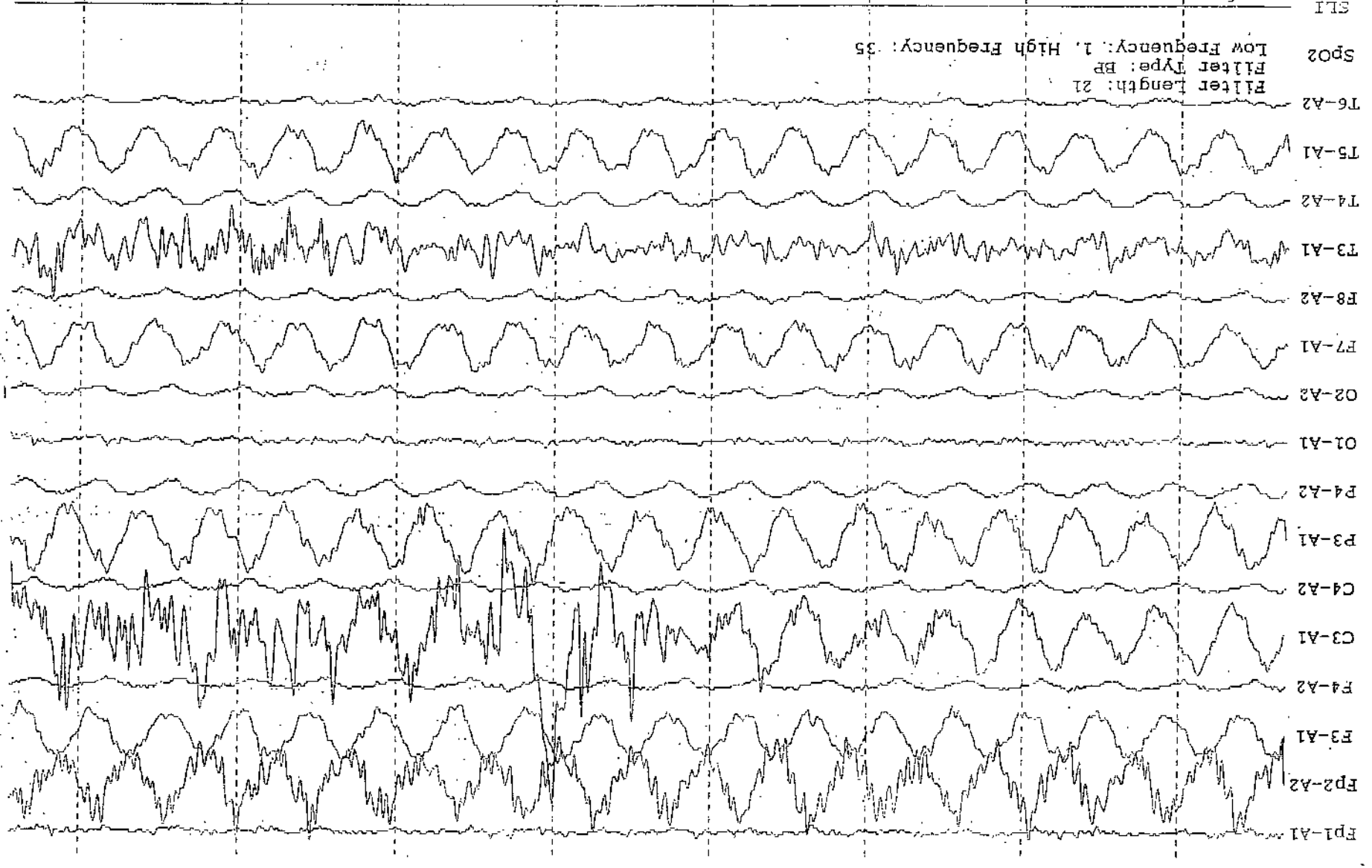
Date: 2-9-2022

Comments:



34

| | | | | |
|------------------|--|-------------|---------------|------------------|
| Name: nalla bibi | | Sex: Female | Age: 33 | Date: 2022/09/02 |
| ID: 0003559 | | Custom: | Speed: 30mm/s | Amp: 30.0mm/50µV |
| Type: EEG Review | | | | |

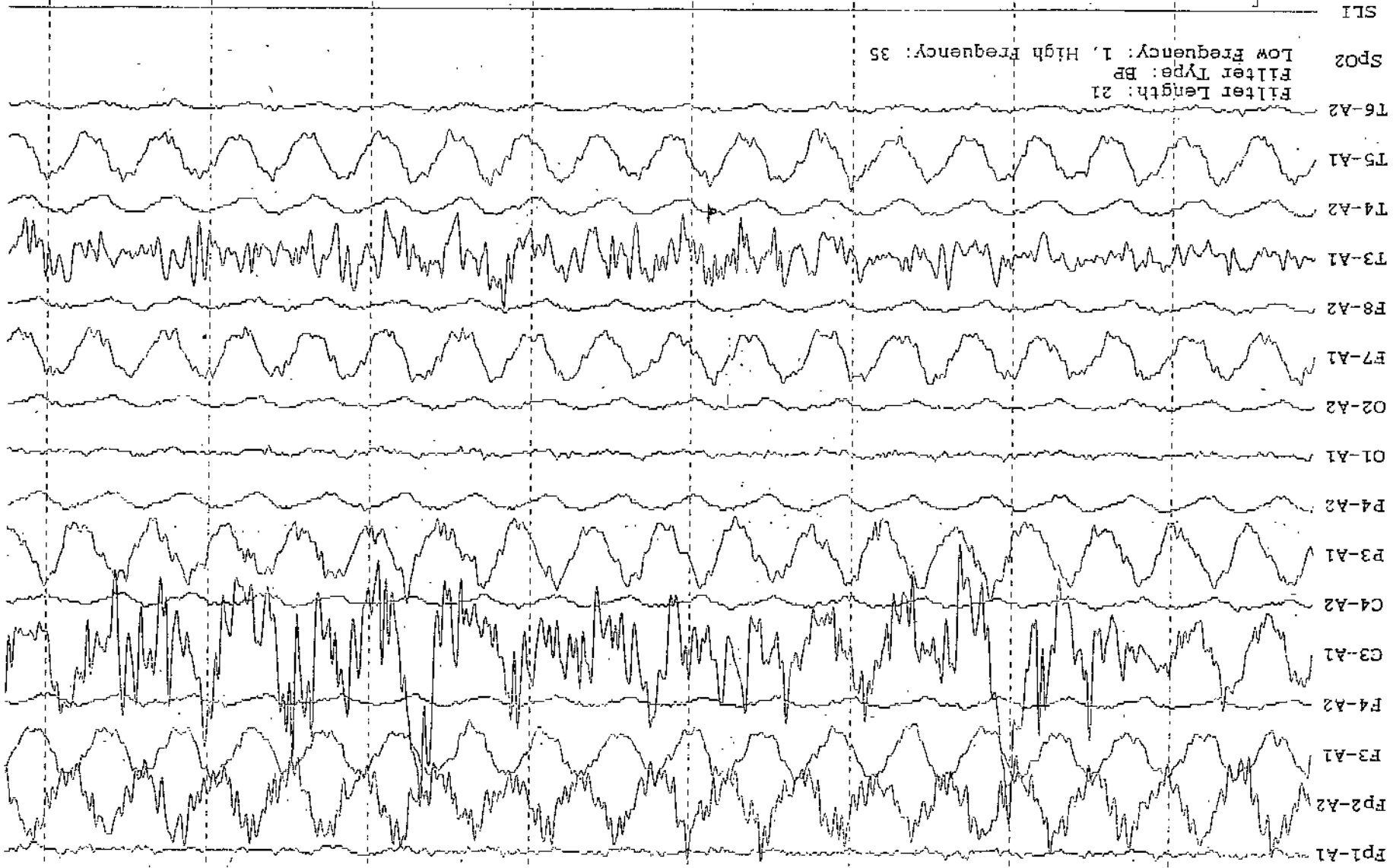


| | | | | | | | |
|----------|----------|----------|----------|----------|----------|----------|----------|
| 16:31:30 | 16:31:31 | 16:31:32 | 16:31:33 | 16:31:34 | 16:31:35 | 16:31:36 | 16:31:37 |
| 0:00:11 | 0:00:12 | 0:00:13 | 0:00:14 | 0:00:15 | 0:00:16 | 0:00:17 | 0:00:18 |

35

Name: natia bibi Sex: Female Age: 33 Date: 2022/09/02

ID: 0003559 Custom: Speed: 30mm/s Amp: 30.0mm/50µV Type: EEG Review



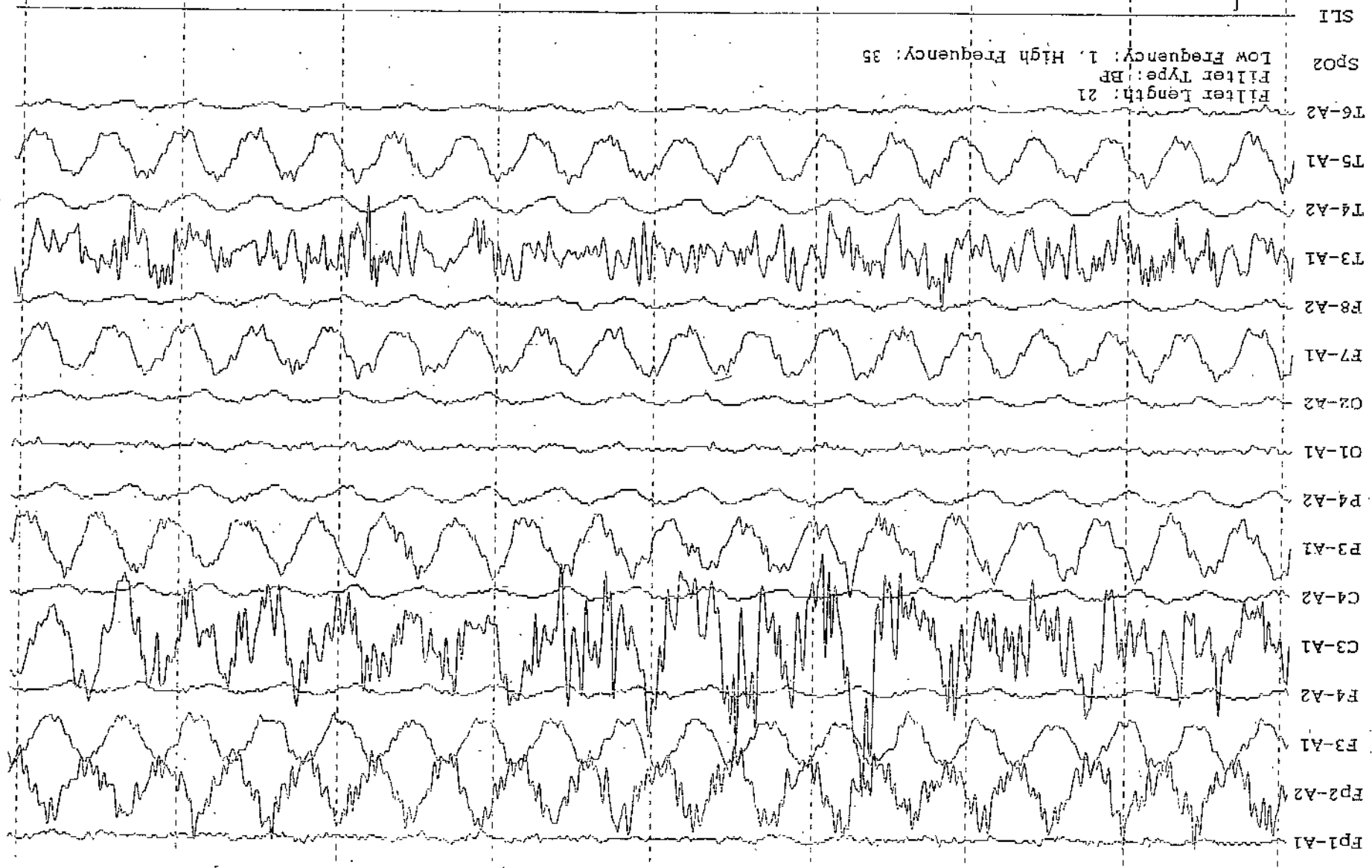
Filter Length: 21
Filter Type: BP
Low Frequency: 1, High Frequency: 35

16:31:33 [0:00:14] 16:31:34 [0:00:15] 16:31:35 [0:00:16] 16:31:36 [0:00:17] 16:31:37 [0:00:18] 16:31:38 [0:00:19] 16:31:39 [0:00:20] 16:31:40 [0:00:21]

36

Name: nalia bibi Sex: Female Age: 33 Date: 2022/09/02

ID: 0003559 Custom: Speed: 30mm/s Amp: 30.0mm/50µV Type: EEG Review



16:31:35 [0:00:16] 5mm 20µV(50g)

16:31:36 [0:00:17]

16:31:37 [0:00:18]

16:31:38 [0:00:19]

16:31:39 [0:00:20]

16:31:40 [0:00:21]

16:31:41 [0:00:22]

16:31:42 [0:00:23]

16:31:43 [0:00:24]

A

37

Name: Naila Bibi

Sex: Female

Age: 33

Date: 2022/09/02

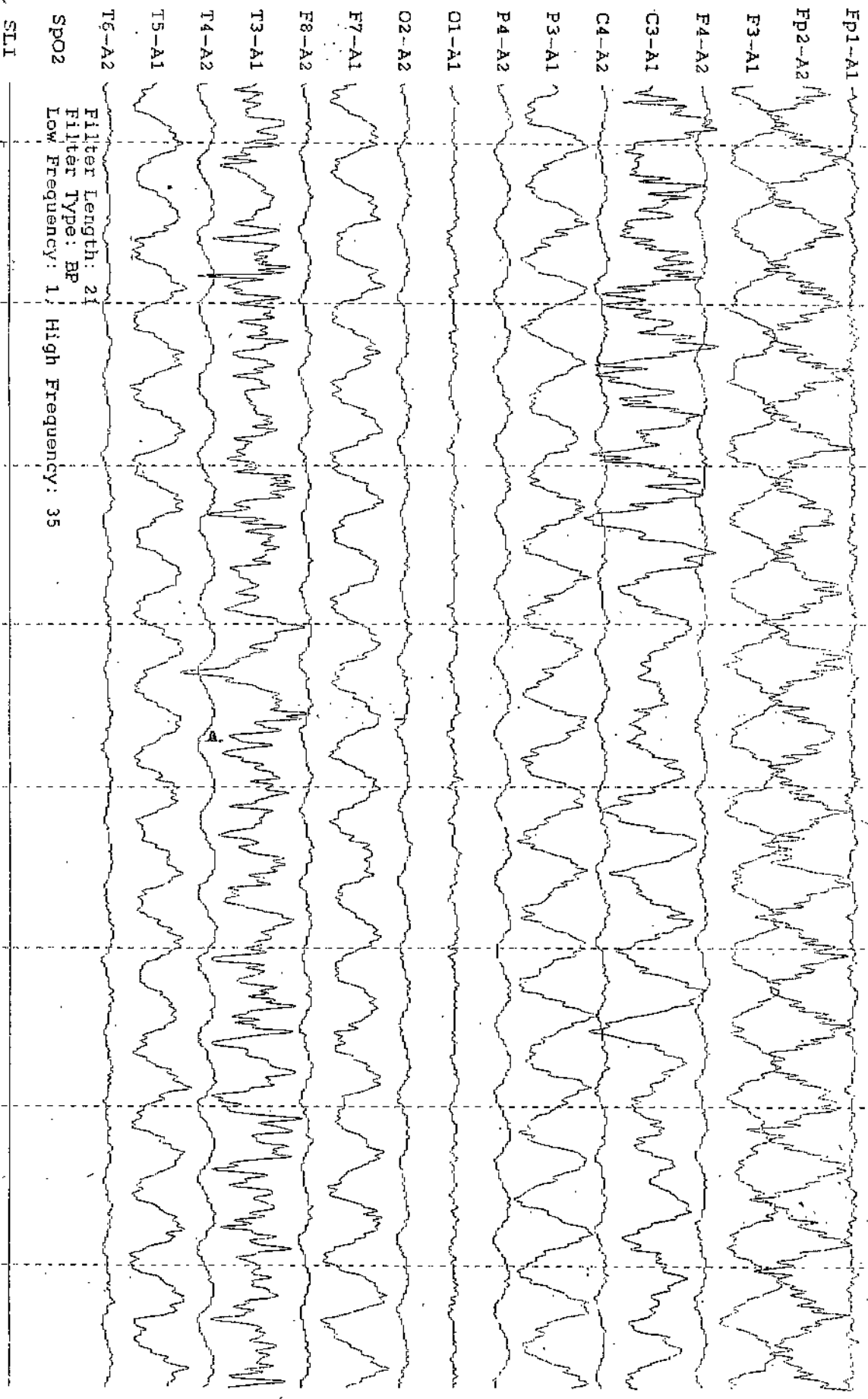
ID: 0003559

Custom:

Speed: 30mm/s

Amp: 30.0mm/50µV

Type: EEG Review



SLI

16:31:40 [0:00:21] 16:31:41 [0:00:22] 16:31:42 [0:00:23] 16:31:43 [0:00:24] 16:31:44 [0:00:25] 16:31:45 [0:00:26] 16:31:46 [0:00:27] 16:31:47 [0:00:28]

5mm
20µV (Eeg)

83

Name: naila bibi

Sex: Female

Age: 33

Date: 2022/09/02

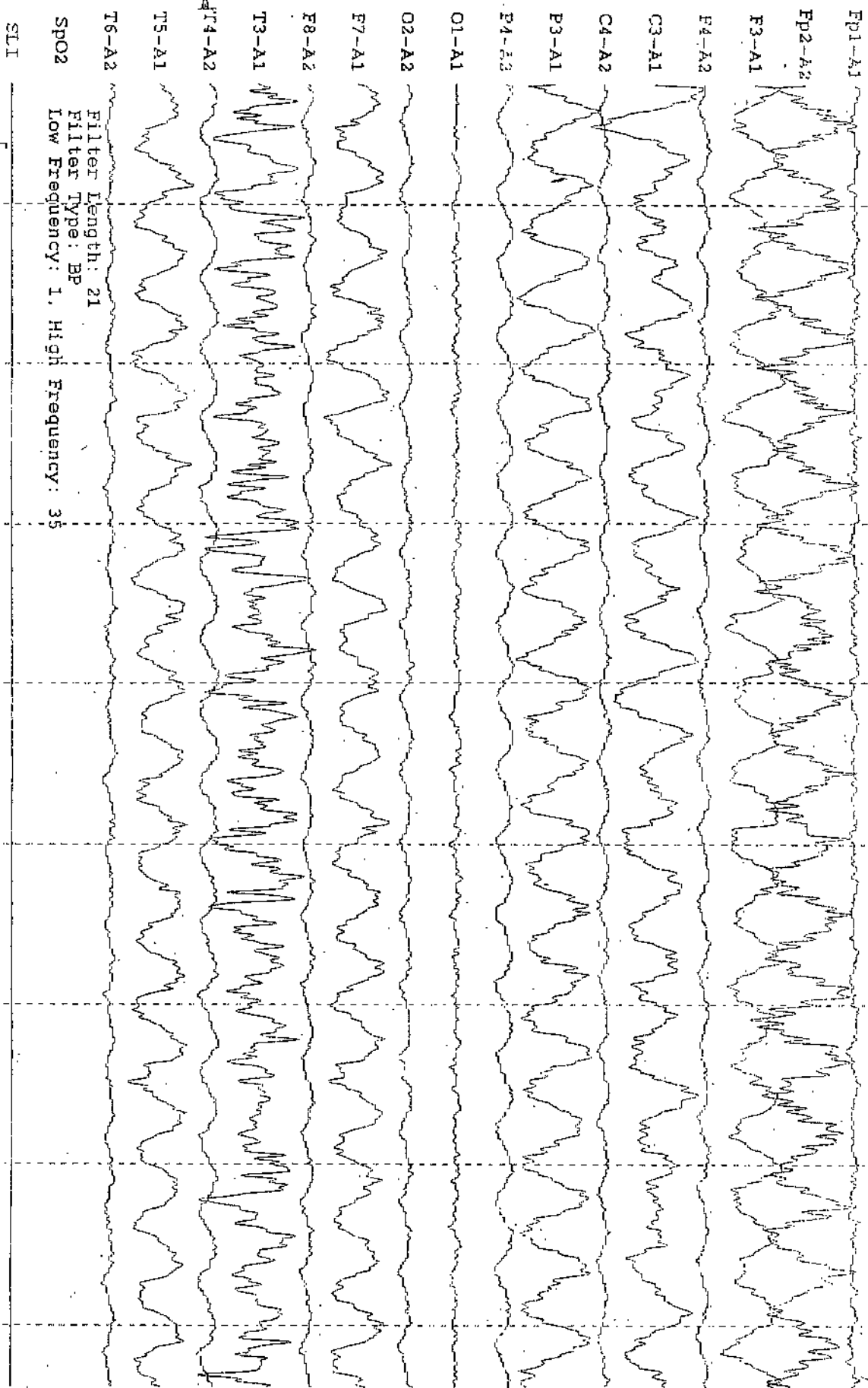
ID: 00035559

Custom:

Speed: 30mm/s



Amp: 30.0mm/50µV

Type: EEG Review




Filter Length: 21
 Filter Type: BP
 Low Frequency: 1, High Frequency: 35

5mm
 20µV (Eg)
 16:31:46 [0:00:27] 16:31:47 [0:00:28] 16:31:48 [0:00:29] 16:31:49 [0:00:30] 16:31:50 [0:00:31] 16:31:51 [0:00:32] 16:31:52 [0:00:33] 16:31:53 [0:00:34]


| | |
|---|--|
| 4548 |    |
| ایڈویکٹ: میا محمد عمر آغا اڈوکیٹس | <p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p> |
| بار کونسل/ ایسوسی ایشن نمبر: Bc-13-4213 | |
| رابطہ نمبر: 03339577770 | |

بعدالت جناب: سروس ٹرمینیشن سٹاد

| | |
|---|--|
| <p>منجانب: سائل مدعی</p>  <p>shah faisal court</p> | <p>دعوی:</p> <p>علت نمبر: Service Appeal</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p> |
|---|--|

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام دستاویز کیلئے میاں محمد عمر آغا اڈوکیٹس کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں بردست خط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا ایبل کی برآمدگی اور سنسوخی، نیز دائرہ کرنے ایبل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سناختہ پر داخست منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے


 المرقوم:

shah faisal 5/10 Gul Alchar 2/10 Peshawar

الع بد بستاد مقام الع بد

Noted And Accepted of Mian Muhammad Imr

نوٹ: اس وکالت نامہ کو نوکالی قابل قبول ہوگی۔