

12.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 29.04.2021 for the same as before.

  
Reader

30.04.2021


Due to demise of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 21.05.2021 for the same as before.

  
Reader

21.05.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 08.06.2021 for the same as before.

08.06.2021

Petitioner with counsel, Addl. AG along with   
Muhammad Haroon, Superintendent for respondent No. 1 and Mst. Shama Gul, Nursing instructor BS-17 Benazir Bhutto Shaheed Hospital Abbottabad (respondent No. 2) in person present.



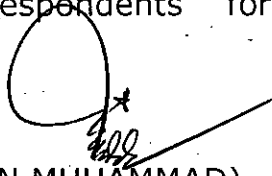
To come up for arguments on the point of maintainability of instant petition on 22.06.2021 before the D.B.

  
Chairman

FORM OF ORDER SHEET

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

C.O.C No. 76 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	01.03.2021	<p>The C.O.C submitted by Mst. Gul Nasreen through Syed Noman Ali Bukhari Advocate may be entered in the relevant Register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This C.O.C. Petition be put up before S. Bench on <u>10/03/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2	10.03.2021	<p>Petitioner is present alongwith Syed Noman Ali Bukhari, Advocate.</p> <p>Notice be issued to the respondents for 26.03.2021 before S.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

(1)

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

COC No. 76 /2021  
IN

Service Appeal No. 766/2021



Gul Nasreen , Chief Nursing superintendent Bs-18, Benazir Bhutto Shaheed Teaching Hospital Abbottabad:

**APPLICANT/PETITIONER**

**VERSUS**

1. The Medical Superintendent, Benazir Bhutto Shaheed Teaching Hospital Abbottabad.
2. MSt. Shama Gul Nursing Instructor BS-17 Benazir Bhutto Shaheed Hospital Abbottabad.

**RESPONDENTS**

.....

**APPLICATION FOR INITIATE CONTEMPT OF  
TRIBUNAL PROCEEDING UNDER ARTICLES 204 OF  
THE CONSTITUTION READ WITH SECTION-3 OF  
THE CONTEMPT OF court ORDINANCE 2003.**

.....

**RESPECTFULLY SHEWETH:**

1. That the applicant/appellant filed Service Appeal No. 766/202 in this august Tribunal against the impugned transfer order dated 1.01.2021 and 04.01.2021.

2. That the said appeal was heard on 02-02-2021 in Preliminary Hearing stage. The said appeal was Admitted and impugned order was suspended vide tribunal order dated 02.02.2021. **(Copy of order Dated 02.02.2021 is attached.**
3. That the appellant was cardiac patient and apply for medical leave which was granted from 11.1.2021 and when the appellant was returned to the office from leave junior official on OPS basis sitting in the office of the appellant with collusion of MS with malafide intention. **Copy of medical prescription and medical leaves is attached.**
4. That the MS says that the appellant was relieved from the charge in absentia during medical leave which is legally not permissible under the law. Further it is added that the appellant never handed over the charge to the private respondent not relive the charge but the private respondent with collusion of MS illegally sitting in the office and mentally torturing the appellant and salary of the appellant was also stopped illegally during the period of medical leave. **Copy of document is attached.**
5. That the appellant neither relive the charge nor handed over the charge to respondent so the order has not been implemented and the department itself not handed over the charge to other junior official without consent and handed over the same by the appellant.
6. That the respondents were totally failed in taking any action regarded the Hon'able Tribunal order dated 02.02.2021 and not adjusted appellant against his post.
7. That not obeying the direction of the Honourable Tribunal by the respondents is amounting to disobedience and Contempt of Tribunal.
8. That being the Apex Tribunal of the Province, the direction of the Honourable Tribunal are binding on each and every organ of the province and cannot be denied or refused at any cost.
9. That the respondents (competent authority) are legally bound to act as directed by the Honourable Tribunal.
10. That inaction of the respondents and unwillingness to obey the direction of the Honourable Tribunal clearly amounts to Contempt of Tribunal.

It is, therefore, most humbly prayed that on acceptance of this application the Contempt of Court Proceedings may be initiated against

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the respondents for not obeying the Honorable Tribunal's directions dated 02.02.2021. The respondent's further please be directed to adjust the appellant against his own post as early as possible to meet the ends of justice and salary of the appellant may also be released. Any other remedy, which this august Tribunal deems fit and appropriate that, may also be awarded in favour of applicant/appellant.

**APPLICANT/APELLANT**

Gul Nasreen

**THROUGH:**

**(SYED NOMAN ALI BUKHARI)  
ADVOCATE, HIGH COURT.**

**AFFIDAVIT:**

It is affirmed and declared that the contents of the above Execution Petition are true and correct to the best of my knowledge and belief.

**DEPONENT**



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**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**



APPEAL NO. 766 /2021

Mst. Gul Nasreen w/o Sajid Afzal Chief Nursing Superintendent (BS-18)  
Benazir Bhutto Shaheed Teaching Hospital Abbottabad.

(APPELLANT)  
Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 1703

- Dated 29/1/2021
1. The Chief Secretary KPK, Civil Secretariat, Peshawar.
  2. The Secretary to Govt: (Health) Deptt., KPK, Peshawar.
  3. The Director General, health services, KP, Peshawar.
  4. District account office Abbottabad.
  5. The Medical Superintendent, Benazir Butto Shaheed, Teaching Hospital Abbottabad.
  6. Mst Shama Gul, Nursing Instructor (BPS-17) Benazir Butto Shaheed, Teaching Hospital Abbottabad.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 01.01.2021 and 04.1. 2021 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED PREMATURELY, UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST THE SPOUSE POLICY, AND AGAINST REJECTION ORDER DATED 28.01.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS.

Filed to-day


Registrar

29/1/2021

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 01.01.2021, 04.1. 2021 and 28.01.2021, MAY BE SET ASIDE TO THE EXTENT OF THE APPELLANT BEING, PASSED PREMATURELY IN VIOLATION OF POSTING/TRANSFER & SPOUSE POLICY AND ALSO POLITICALLY MOTIVATED. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT

**ATTESTED**

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Appeal No 766/2021  
Ms. Gul Nabeen vs Govt



02.02.2021

Counsel for the appellant present.

Learned counsel referred to notification dated 01.01.2021 issued by respondent No. 2, whereby, the appellant was transferred from BBS Teaching Hospital, Abbottabad and posted in DHQ Hospital, Haripur. Another notification of even date was also issued regarding the transfer of appellant but in terms of same stations i.e. transfer from BBS Teaching Hospital Abbottabad to DHQ Hospital Haripur. Both the notifications were in utter disregard to the transfer/posting policy of the Provincial Government. Learned counsel, in furtherance of his arguments, referred to the Service Card of appellant's husband namely Said Afzal Khan. As per the particulars in the card Said Afzal Khan was posted as Clinical Technologist Pharmacy at BBS Teaching Hospital Abbottabad. It is the contention of learned counsel that under paragraph 9 of the posting/transfer policy of Provincial Government dated 15.02.2020, it is provided that in case of posting of husband and wife, both in Provincial services, efforts where possible would be made to post such persons at one station. It is also the stance of appellant that she being a cardiac patient cannot travel from Abbottabad to Haripur on daily basis.

Prima-facie, there is violation on the part of respondents in observing Paragraph 9 of the policy ibid. Besides, the requirements for issuance of two notifications to the same effect is also not assimilated from the record. The appeal in hand is, therefore, admitted to regular hearing subject to all just exceptions. Appellant is required to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 17.02.2021 before S.B.

Alongwith the appeal, an application for suspension of impugned orders has also been submitted. Notice of the application be also given to the respondents for the date fixed. In the meanwhile, the operation of impugned order dated 01.01.2021, 04.01.2021 and 28.01.2021 shall remain suspended to the extent of appellant, if not acted upon already.

Certified to be true copy  
EXCUTER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

  
Chairman

Date of Presentation of Application 02/02/21  
Number of Words 8122  
Copying Fee 10.00  
Urgent 4.00  
Total 14.00  
Name of Copyist  
Date of Completion of Copy 02/02/21  
Date of Delivery of Copy 02/02/21








To  
The Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.

Subject: Medical Leave

1. It is intimated that I had been under severe mental stress and anxiety due to certain reasons for last few days which resulted in severe chest pain. Last night I was taken to CMH, Abbottabad and then got admitted in BBS teaching Hospital, Abbottabad today (13 Jan 2021), where doctors examined me and advised me complete bed rest for three days with effect from 14-01-2021 to 16-01-2021 (copy of bed rest attached with application).
2. Antecedent, you are requested to grant me medical/sick leave with effect from 14-01-2021 to 16-01-2021.
3. Forwarded for kind approval, please.

Yours Sincerely  


Gul Nasreen

CNS - BPS-18

BBS Teaching Hospital  
Abbottabad.

On Admission DOB: N/A

cus. 8.1.2020

BP 130/90

Initial Investigations

Blood CP TLC: 7.74, Hb 10.6, Pft: 338

Urine RE

Sugar Urea 78 Creatinine 2.3

LFTs ALT: 174, AST: 36, RSH: 0.82

ECG LBBB (bid)

CXR

ECHO

Other Investigations

Trop I - Negative

MEDICATION GIVEN

Tab coxmedasim 100mg bid  
Tab lopin 25mg bid  
MP

Medication on Discharge **گھر کے لیے علاج**

Tab Lasix 40mg    دن  
190 P    دن

Tab lopin 25mg    دن  
190 P    دن

Tab coxmedasim 100mg    دن  
190 P    دن

Tab Rovista 100mg    دن  
190 P    دن

Tab coxmedasim 100mg    دن  
190 P    دن

Advant Treviamet Qraise 100mg RiVAXO

Medication on Discharge گھر کے لیے علاج

Tab Rosuvastatin  
1-c1

شام	دوپہر	صبح	دن
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
کھانے کے بعد	کھانے سے پہلے		
<input type="checkbox"/>	<input type="checkbox"/>		

T.S. Cardiolipin  
1-c1

شام	دوپہر	صبح	دن
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
کھانے کے بعد	کھانے سے پہلے		
<input type="checkbox"/>	<input type="checkbox"/>		

Adv  
Bed rest for 03 days  
wet tomorrow onwards

شام	دوپہر	صبح	دن
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
کھانے کے بعد	کھانے سے پہلے		
<input type="checkbox"/>	<input type="checkbox"/>		

~~Medication on Discharge~~

شام	دوپہر	صبح	دن
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
کھانے کے بعد	کھانے سے پہلے		
<input type="checkbox"/>	<input type="checkbox"/>		

ref to Hepatitis

شام	دوپہر	صبح	دن
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
کھانے کے بعد	کھانے سے پہلے		
<input type="checkbox"/>	<input type="checkbox"/>		

Advant      Treviamet      Graise 100mg      RIVAXO

BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL



ABBOTTABAD

DEPARTMENT OF CARDIOLOGY  
CCU

Name  Gul Nazreen w/o Said Afzal Khan

Age 57y

Address Abbottabad.

DOA 13-1-21      DOD 13-01-21

Diagnosis DCM LBBB. HTN

BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

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GENERAL OPD

OPD No: 2764

Serial No.

Name: Gul Nisreen

Date: 18/01/21

fe. Fever

cough

sores Thd

M Oxidial 19mw 11u  
AD(AD)

(S) S

M No new 114 5.05

Tob pendal  
H11

Syp pulmorob  
1711  
(PTO)

Name of Doctor: \_\_\_\_\_

Signature: \_\_\_\_\_

Advised:

Bed Rest For

3-days.

Warrant  
FBI  
oppo.

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The MS  
BBS Hospital  
Abbottabad

Sub:- Sick Leave

Sir,

with due respect it is  
stated that due to illness  
I am unable to perform my  
duties. Doctor has advised me  
bed rest.

Kindly grant me  
(03) days Sick Leave w.e.f  
18-1-2021.

Thanks

Enul yours Sincerely

Enul Naveed

CNS BBS

Hosp. ATD

To,

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The Medical Superintendent.

B. B. S Teaching Hospital.

Abbottabad.

Sir,

It is intimated that I have been suffering from fever, cough and headache for last few days. On deteriorating my health issue I went to CMH Abbottabad where Dr. examined me and advised me complete bed rest for 2x days with effect from 21-01-2021 to 22-01-2021.

Antecedent, you are requested to grant me 2x days leave for above mentioned dates. Med disposal sheet/ rest certificate attached with.

Forwarded for kind approval, please.

Yours Sincerely

Gul Nasreen

CNS BBS Teaching

Hosp Abbottabad

21-1-2021.



CONFID

In Lieu of PAFM-1316(CS)

# MEDICAL CASE SHEET

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(See instr of 52 Regs for Med Svcs of Armrd Forces Vo-II.....1978)

Serial No. in admission and disch book..... Hosp.....

No: 9006 Rank: M/Lt Lt Name: Asfand Far Khan Unit: PNS Quim

Age: 57 yrs Svc:

Disease:

Date and time: 21/7/201

Condition on Admission and Progress of Case. (Incl complaints, present, past hist, family and personal hist, clinical exam investigation and their results and the treatment prescribed Progress-report will be written as often as is nec)

57 yo F. patient  
 - NO documented  
 Co Morbidities  
 - IHD (+)  
 - 80% throat  
 - Fever / Headache / or  
 dry

NO SOB  
 taste / smell OK

Agumia tab 500mg  
 - 800mg tab 1x1d  
 - Hydralazine up  
 1x1d  
 - P/c tab 2x1d

SIR x 02 days

consult of symptoms persist / dent

CMP Dr Samiullah Khan MEd CMH Atd

CMP Dr Samiullah Khan CMH Atd

CONFID

The MS  
BBS Hospital  
Abbottabad

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Sub: Sick Leave

Sir,

with due respect it is  
stated that due to illness  
I am unable to perform my  
duties.

Doctor has advised me  
bed rest.

Kindly grant me Sick  
Leave for 05 days i.e. of  
23/01/2021.

Thanks

Yours Sincerely  
Gul

Gul Nazneen  
CMS  
BBS Hosp  
Abbottabad

Date: - 23/1/2021



**AYUB TEACHING HOSPITAL, ABBOTTABAD**  
**Accident & Emergency Service Department**

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Book No 4096

S. No. 38

Patient ID:	Patient Name:
Patient Age:	Patient Sex:
Patient Date & Time:	Patient Mode:
OPD:	Address:
IDP Status:	Amount:

Dcmp

WET 30/1

2

AYUB TEACHING HOSPITAL  
 ABBOTTABAD  
 111, 117, 118

Ca

= SOB

or the pain

1) Ib. Sacril 200  
 (C + E)

2) Ib. Parale 200  
 (C + E)

O/E

BP 160/100

Ca 28

Time Cap 2

Bl

3) Ib. Ibma 200  
 (C + E)

4) Ib. AS 200  
 (C + E)

5) Ib. Lipinax 200  
 (C + E)

ECG LBBB old

6) Hy. Labix 40mg 10 Sat

C, 3 (C + E)

Bed rest for 04 days  
 we.f 23/01/2021

The M.S  
BBS Hospital  
Abbotabad

Subj - Sick Leave

Sir,

with due respect it is stated that due to illness I am unable to perform my duties.

Doctor has advised me bed rest.

Kindly grant me (03) days sick leave w.e.f. 27-1-21

Thanks

Yours Sincerely

Gul Nazneen

CNS BBS

HOSP. ATD

Date - 27-1-2021

# CMH ABBOTTABAD

## Specialist's Report

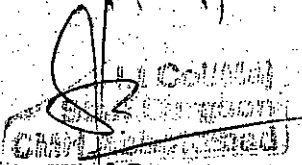
Report by spec in        Date         
 No 9006 Rank M/Plt Name Asif Ali Khan Gul Nerve  
 Age        Unit PAS Qurban  
 Diagnosis       

2/11

Specialist,

### 1. Complaints

*Rept from Surg for adu PI*



### 2. History of Present illness

Rx

Tab. Tonoflex-P

1 x OP

Tab. Nubend forte

1 + 1

### 3. Clinical Exam

Tab. Cypica song

1 x O

Bed rest  
for 03 days.

**Dr. Kamran Shah**  
 Resident Surgeon  
 CMH Abbottabad

The M.S  
BBS Hospital  
Abbottabad

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Sub:- Sick Leave

Sir, with due respect it is stated that due to illness I am unable to perform my duties. Doctor has advised me bed rest for (05) days i.e. of 29-1-2021.

Thanks

Yours Sincerely  
Gul Gul Nasreen  
CNS BBS Hospital  
Abbottabad

Date:- 30-1-2021

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OPD Prescription form

Patient Name : Gul Nasreen  
Spouse Name : SAIF AFZAL KHAN  
Age : 57 Year(s) 00 Month(s) 0 Day(s)  
Patient Type : REGULAR

Investigation

~~Investigation~~

- Fever - 4 day  
- Body Ache - 5 day  
- Pen Bz/gent  
- cough

DD Bacteria /  
Viral fever

Ty Oxidol 1gn 1x B.D  
for 10 day

Ten Azomax 250  
CS 5 - 1 - 5

Ten Paracetamol  
1 - 15  
Top 2000 20  
1 - 10 - 5 D

Advise Bed Rest for 05 day  
Five day

29/01/21

PLAN

All BLS  
Carrel PUP

S. Roscher

LD 51

CAP

IL6

Perpet LR



درخواستہ عمود اصلاح احوال

خوابہ عالی! مہربانی درخواستہ ذیل ہے۔

1. یہ کہ ایک عرصہ سے ہسپتال انتظامیہ اور ان کے چند مخصوص عمود اور خرابیوں کے بارے میں مسائل کو مسترد کر دینے کو فتنے میں مبتلا اور برائیاں کر رہے ہیں۔
  2. یہ کہ اس کے علاوہ جملہ کے مسائل کو یہاں BBS سے بڑے پود غیر مازوں اور غیر منصفانہ تبدیلیوں کو پیش کرتے ہیں۔ جو کہ مسائل کے درخواستہ برعکس عدالت نے معلق کر کے مسائل کو اپنے ڈیوٹی کے جاری رکھنے کے احکامات جاری کیے۔
  3. یہ کہ عدالتی احکامات کے باوجود مسائل کے فرائض منصبی کے راہ میں واہنہ اور سوچے سمجھے منصوبے کے تحت روڈے اٹکائے جا رہے ہیں۔ حالانکہ اس سے پہلے بھی مسائل عدالتی قلم کے ساتھ ایک مدد درخواستہ خوابہ کے خدمت میں پیش کر چکے ہیں مگر جوابہ تا حال مسائل کو نہیں دلا۔
  4. یہ کہ قائم تحریر انتظامیہ کے ایما پر غیر متعلقہ نوکروں کے ساتھ ملکر ڈیوٹی دوسرے بنادے دیے۔ ڈاؤنڈ میں لے دیے ہیں۔ اور دستوری امور میں سے شمع گلے نرسنگ انٹرنسٹ کو ایک CNS کے موجودگی میں بلور CNS ہی ٹیم کیا جا رہا ہے۔ جو کہ شمع گلے اور انتظامیہ ہسپتال کے طور سے عدالتی مالیت کے احکامات کے ساتھ جھوٹا مذاقہ اور ایک سوکاری ادارے کے استحقاق کے نفع کوٹے ہوئے۔ آنا پڑھے، ذاتی مناد میں اندھے پینے کے بنا پر ایک ذاتی جاگیر اور سامنے سلطنت کے مگاسو کرتا ہے۔
  5. یہ کہ شمع گلے، ہسپتال انتظامیہ اور انتظامیہ کے مخصوص مسائل کے خلاف تشیلے دیے گئے تھے تاکہ نرسنگ فورس کے مسائل کو برائیاں کر رہے ہیں۔ اور اذیت میں مبتلا کر رہے ہیں۔ جو کہ بنیاد میں اس کے حقوق اور عدالتی قلم کے خلاف دینے ہیں۔
- بذریعہ درخواستہ پہلے سے کہ مسائل کے ساتھ انتظامیہ کارروائیوں کا سلسلہ بند کر کے عدالتی مالیت کے احکامات کے تشیلے کو جائے اور مذکورہ ماسو کو مسائل کے اختیارات میں ہے جا ملافت سے باز رکھا جائے۔

الحامد

گلے نرسنگ

CNS - BBS ہسپتال ایسے آباد

کما حقہ: ① خوابہ DC ماہنامہ قلم ایسے آباد

② دستوراد سپریم کورٹ آف پاکستان

③ مدد و جنرل سیکریٹری کے بار کونسل ایسے آباد

درخواستہ برخلاف بندشہ تنخواہ

جانب مالک! مغربہ درخواستہ ذیل ہے۔

1۔ یہ کہ سائلہ عدالتی عالیہ کے احکامات کے مطابق اپنے ڈیوٹی باقاعدگی سے سرانجام دے رہی ہے۔

2۔ یہ کہ سائلہ کچھ ماہ جنوری کے تنخواہ غیر قانونی طور پر جانب کے دفتر کے طرف سے بند کر دی گئی۔ جو کہ سائلہ کے معاشی تعلق کے مترادف ہے۔ اور اس وجہ سے سائلہ معاشی مسائل کے ساتھ ذہنی اذیتے ارد گردی میں مبتلا ہے۔

اور سپریم کورٹ کے واضح احکامات ہیں کہ کسی بھی سرکاری ملازم کے تنخواہ کے بندشہ غیر قانونی اور قابلے گرفت ہے۔ جبکہ سائلہ کے غیر قانونی تبدیلیے کو جسے عدالتی عالیہ نے کالعدم قرار دیا ہے تو مطلقہ کر دیا۔ اور سائلہ عدالتی احکامات کے مطابق اپنے فرائض منصبی باقاعدگی سے سرانجام دے رہی ہے۔ اور سائلہ یہ سمجھتی ہے کہ حقہ جانب ہے کہ سائلہ کے ساتھ یہ رویہ ذائقے عناد اور بددلی کے پروردگار کیا ہے۔ اور اختیارات کے ناجائز استعمال اور انتقامی کاروائی کے کاغذ کرتا ہے۔ لہذا استدعا ہے کہ سائلہ کے تنخواہ جاری ہونے کے احکامات جاری کیے جائیں۔

سپریم کورٹ آف پاکستان کا حکیمانہ بابت بندشہ تنخواہ  
سابقہ لکھ درخواستہ ہے۔

العادہ  
ملکہ شوبینہ  
پیفہ نرنکہ پرنٹرنٹ  
BBS ہسپتال  
ایسے آباد

السرورم 12/2/2021

درخواست تہر ادا اٹلگے شیرداد الہ ذبی کونے

باب عالی!

مہونے درخواست ذیل ہے۔

- 1- یہ کہ عدالت عالیہ سے واضح احکامات برائے معطلی تبدیلے سائل کے باوجود خانے کھ طرف سے سائل کو انتقامی کاروائی کا نشانہ بنائے برائے آٹے دن برائے کونے ذبی کونے میں مبتلا کونے عدالتی احکامات کے درمیان بکھر کر ایک سواری کے ادا سے کے استحقاق کو مہر و کونے ذائقہ جائز کہ منظر تھی کی جا رہی ہے۔
  - 2- یہ کہ سائل کی طرف سے دی گئی سابقہ درخواستیں بھی ذاب نے دانت اپنے نیز پر دھوی ہے اور ان پر کوئی عملے یا جواب سائل کو نہیں دیا جا رہا۔
  - 3- یہ کہ سائل با نابطلہ طور پر اپنے ڈیوٹی کر رہی ہے۔ آٹے باوجود سائل کا شیر غیر قانونی طور پر بند کر دیا گیا۔ وہ بھی بلا وجہ جو کہ ذاتی مناد، بدینتی، انتقامی کاروائی اور جانمانہ ذینے کی محاسن کرتا ہے۔ اور ماسخی قتلے کے مترادف ہے۔
- ہیذا سائل کو سائل کے اسے بنیادی حق تلفی کی وجہ بتائی جائے کہ یہ یا میں ہے حکومت کے ادا سے کسی ملازمہ ہوں یا کسی کے ذاتی کمپنی یا ادارہ کے ملازمہ ہوں۔
- سائل کا ماہ ستمبر، اکتوبر، نومبر 2020 کا شیر مبلغ 25000 ادا کیا جائے۔

الحادفہ  
نگلے نوریہ  
BBS - CNS  
ہسپتال ایسے آباد

التوقوم :- 13/2/2021

4  
30

months of IIR  
subject  
m/RISB

m/Rest

Application concerning  
compliance of collect order  
Application regarding  
1 Day stoppage of JMS  
m/Rest

Application regarding  
stoppage of 03 months  
(Sep. Oct. Nov) JMS

2021		
Days	Ngmch	Revised
03 days	Y/N Robins. Y.	<del>Y/N Robins. Y.</del>
18 days on 11/02 to 28/11/2021	Y/N Nails Manzo C/O Nasreen	<del>Y/N Nails Manzo</del>
11/2/21	C/O Nasreen CNS	<del>C/O Nasreen</del>
12/2/21	C/O Nasreen CNS	<del>C/O Nasreen</del>
Two weeks on 11/02 to 24/02/2021	Y/N Rashid. SB	<del>Y/N Rashid. SB</del>
03 months (Sep. Oct. Nov)	C/O Nasreen CNS	<del>C/O Nasreen</del>

4

The Chief Nursing Superintendent  
BBS Teaching Hospital,  
Abbottabad

681  
ICER

6

Subj: Medical Rest.

Respected Madam,

With due respect, it is stated that I have fracture of fibula + ankle joint. Doctor's advise me complete bed rest for 2 weeks w.e.f 12<sup>th</sup> Feb kindly accepted.

Thank's Yours Sincerely,  
Yr Rashid Farooq

Date 11-02-2021

- Forwarded to M.S for  
N/ACTION please

Ajmal  
CNS  
11/02/2021.

25

The Chief Nursing Superintendent,  
B.B.S Teaching Hospital,  
Abbotabad.

Subject - Medical Rest.

Respected Madam,

With due respect, it is stated  
that I have fracture of fibula +  
ankle joint. Doctor's advise me complete  
bed rest for 2 weeks with the cast  
kindly accepted.

Thank's Yours Sincerely,  
Yr Obedient Servant  
Dated 11-02-2021

CNS. Rasana  
- Staff -  
for comments pls.

*[Signature]*

As she is taking rest  
- Forgo...  
13/02/2021

Go m/s  
please.  
CNS  
11/02/2021

40

Lady

Dr. Misbah Yousaf Qazi

MBBS, DGO, PMDC # 10603-N

Senior District Gynaecologist

D.H.Q, Teaching Hospital Haripur



بیڈی ڈاکٹر مصباح یوسف قاضی

ایم بی بی ایس، ڈی جی او

سینئر ڈسٹرکٹ گائناکولوجسٹ

ڈی۔ ایچ۔ کیو، ٹیچنگ ہسپتال ہری پور

26

القاضی کلینک میٹرنٹی ہوم

Name: Beemsha / A.B. Qazi 30 yrs Date: 01/12/20

Clinical Record Rx

pelvic scan

G.P.A. 18w  
BB=27  
(LHD=cmH)

A +ve

try to see  
try to see

Plac +ve

G.A. 2nd  
from

Tal. Bridg  
— — —

Lap occp  
Complex  
fetal  
calic

1st 9/12/20

Temp

Tal. WOSP  
— — — 141

AG  
CP  
Hyp/HBS  
Hiv

Bp 140/90

Wt 68kg

Sup. Fibro  
— — —

her

Dr. Misbah Yousaf Qazi

(1)

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

COC No. 76 /2021  
IN

Service Appeal No. 766/2021

Gul Nasreen , Chief Nursing superintendent Bs-18, Benazir Bhutto Shaheed  
Teaching Hospital Abbottabad:

**APPLICANT/PETITIONER**

**VERSUS**

1. The Medical Superintendent, Benazir Bhutto Shaheed Teaching Hospital Abbottabad.
2. MSt. Shama Gul Nursing Instructor BS-17 Benazir Bhutto Shaheed Hospital Abbottabad.

**RESPONDENTS**

.....

**APPLICATION FOR INITIATE CONTEMPT OF  
TRIBUNAL PROCEEDING UNDER ARTICLES 204 OF  
THE CONSTITUTION READ WITH SECTION-3 OF  
THE CONTEMPT OF court ORDINANCE 2003.**

.....

**RESPECTFULLY SHEWETH:**

1. That the applicant/appellant filed Service Appeal No. 766/202 in this august Tribunal against the impugned transfer order dated 1.01.2021 and 04.01.2021.



2. That the said appeal was heard on 02-02-2021 in Preliminary Hearing stage. The said appeal was Admitted and impugned order was suspended vide tribunal order dated 02.02.2021. **(Copy of order Dated 02.02.2021 is attached.**
3. That the appellant was cardiac patient and apply for medical leave which was granted from 11.1.2021 and when the appellant was returned to the office from leave junior official on OPS basis sitting in the office of the appellant with collusion of MS with malafide intention. **Copy of medical prescription and medical leaves is attached.**
4. That the MS says that the appellant was relieved from the charge in absentia during medical leave which is legally not permissible under the law. Further it is added that the appellant never handed over the charge to the private respondent not relive the charge but the private respondent with collusion of MS illegally sitting in the office and mentally torturing the appellant and salary of the appellant was also stopped illegally during the period of medical leave. **Copy of document is attached.**
5. That the appellant neither relive the charge nor handed over the charge to respondent so the order has not been implemented and the department itself not handed over the charge to other junior official without consent and handed over the same by the appellant.
6. That the respondents were totally failed in taking any action regarded the Hon'able Tribunal order dated 02.02.2021 and not adjusted appellant against his post.
7. That not obeying the direction of the Honourable Tribunal by the respondents is amounting to disobedience and Contempt of Tribunal.
8. That being the Apex Tribunal of the Province, the direction of the Honourable Tribunal are binding on each and every organ of the province and cannot be denied or refused at any cost.
9. That the respondents (competent authority) are legally bound to act as directed by the Honourable Tribunal.
10. That inaction of the respondents and unwillingness to obey the direction of the Honourable Tribunal clearly amounts to Contempt of Tribunal.

It is, therefore, most humbly prayed that on acceptance of this application the Contempt of Court Proceedings may be initiated against

(3)


the respondents for not obeying the Honorable Tribunal's directions dated 02.02.2021. The respondent's further please be directed to adjust the appellant against his own post as early as possible to meet the ends of justice and salary of the appellant may also be released. Any other remedy, which this august Tribunal deems fit and appropriate that, may also be awarded in favour of applicant/appellant.



**APPLICANT/APELLANT**

Gul Nasreen

**THROUGH:**



**(SYED NOMAN ALI BUKHARI)  
ADVOCATE, HIGH COURT.**

**AFFIDAVIT:**

It is affirmed and declared that the contents of the above Execution Petition are true and correct to the best of my knowledge and belief.



**DEPONENT**

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR



APPEAL NO. 766 /2021

Mst. Gul Nasreen w/o Sajid Afzal Chief Nursing Superintendent (BS-18)  
Benazir Bhutto Shaheed Teaching Hospital Abbottabad.

(APPELLANT)  
Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 1703

- Dated 29/11/2021
1. The Chief Secretary KPK, Civil Secretariat, Peshawar.
  2. The Secretary to Govt: (Health) Deptt., KPK, Peshawar.
  3. The Director General, health services, KP, Peshawar.
  4. District account office Abbottabad.
  5. The Medical Superintendent, Benazir Butto Shaheed, Teaching Hospital Abbottabad.
  6. Mst Shama Gul, Nursing Instructor (BPS-17) Benazir Butto Shaheed, Teaching Hospital Abbottabad.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 01.01.2021 and 04.1. 2021 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED PREMATURELY, UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST THE SPOUSE POLICY, AND AGAINST REJECTION ORDER DATED 28.01.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS.

Filed to-day


Registrar

29/11/2021

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 01.01.2021, 04.1. 2021 and 28.01.2021, MAY BE SET ASIDE TO THE EXTENT OF THE APPELLANT BEING, PASSED PREMATURELY IN VIOLATION OF POSTING/TRANSFER & SPOUSE POLICY AND ALSO POLITICALLY MOTIVATED. THE RESPONDENT DEPTT: MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT

**ATTESTED**

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Appeal No. 766/2021 (5)  
Ms. Gul Naveen vs Govt



02.02.2021

Counsel for the appellants present.

Learned counsel referred to notification dated 01.01.2021 issued by respondent No. 2, whereby, the appellant was transferred from BBS Teaching Hospital, Abbottabad and posted in DHQ Hospital, Haripur. Another notification of even date was also issued regarding the transfer of appellant but in terms of same stations i.e. transfer from BBS Teaching Hospital Abbottabad to DHQ Hospital Haripur. Both the notifications were in utter disregard to the transfer/posting policy of the Provincial Government. Learned counsel, in furtherance of his arguments, referred to the Service Card of appellant's husband namely Said Afzal Khan. As per the particulars in the card Said Afzal Khan was posted as Clinical Technologist Pharmacy at BBS Teaching Hospital Abbottabad. It is the contention of learned counsel that under paragraph 9 of the posting/transfer policy of Provincial Government dated 15.02.2020, it is provided that in case of posting of husband and wife, both in Provincial services, efforts where possible would be made to post such persons at one station. It is also the stance of appellant that she being a cardiac patient cannot travel from Abbottabad to Haripur on daily basis.

Prima-facie, there is violation on the part of respondents in observing Paragraph 9 of the policy *ibid*. Besides, the requirements for issuance of two notifications to the same effect is also not assimilated from the record. The appeal in hand is, therefore, admitted to regular hearing subject to all just exceptions. Appellant is required to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 17.02.2021 before S.B.

Alongwith the appeal, an application for suspension of impugned orders has also been submitted. Notice of the application be also given to the respondents for the date fixed. In the meanwhile, the operation of impugned order dated 01.01.2021, 04.01.2021 and 28.01.2021 shall remain suspended to the extent of appellant, if not acted upon already.

**Date of Presentation of Application** 02/02/21  
**Number of Words** 872  
**Copying Fee** 10.00  
**Urgent** 4.00  
**Total** 14.00  
**Name of Copyist** \_\_\_\_\_  
**Date of Completion of Copy** 02/02/21  
**Date of Delivery of Copy** 02/02/21

**Certified to be true copy**  
**EXAMINER**  
**Khyber Pakhtunkhwa**  
**Service Tribunal**  
**Peshawar**

  
Chairman






To

9

The Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.

Subject: Medical Leave

1. It is intimated that I had been under severe mental stress and anxiety due to certain reasons for last few days which resulted in severe chest pain. Last night I was taken to CMH, Abbottabad and then got admitted in BBS teaching Hospital, Abbottabad today (13 Jan 2021), where doctors examined me and advised me complete bed rest for three days with effect from 14-01-2021 to 16-01-2021 (copy of bed rest attached with application).
2. Antecedent, you are requested to grant me medical/sick leave with effect from 14-01-2021 to 16-01-2021.
3. Forwarded for kind approval, Please

Yours sincerely  


Gul Nasreen  
CNS - BPS-18  
BBS Teaching Hospital  
Abbottabad.

On Admission DOB: N/A

cus. 8/2/20

Bp 130/90

Intial Investigations

Blood CP TLC: 7.74, Hb 10.6, Plt: 338

Urine RE

Sugar \_\_\_\_\_ Urea 78 Creatinine 2.3

LFTs AKR: 174, ALT: 36, AST: 58

ECG LBBB (old)

CXR

ECHO

Other Investigations

Trop I - Negative

MEDICATION GIVEN

1up Rim-emetamide 4mg stat  
Tab coxmeda 300mg 1up Losix 4mg 40  
El Lepin 750mg 2up  
MP

Medication on Discharge **گھر کے لیے علاج**

Tab Losix 4mg  شام  دوپہر  صبح  
1up دن  
1up  کھانے سے پہلے  کھانے کے بعد

Tab Lepin 750mg  شام  دوپہر  صبح  
1up دن  
1up  کھانے سے پہلے  کھانے کے بعد

Tab Coxmeda 300mg  شام  دوپہر  صبح  
1up دن  
1up  کھانے سے پہلے  کھانے کے بعد

Tab Rovista 100mg  شام  دوپہر  صبح  
1up دن  
1up  کھانے سے پہلے  کھانے کے بعد

Tab Cofesmi 400mg  شام  دوپہر  صبح  
1up دن  
1up  کھانے سے پہلے  کھانے کے بعد



BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

10

OPD No: 2764 GENERAL OPD

Serial No.

Name: Gul Nadeem

Date: 10/01/21

fever

cough

sores in

my oxidol 19mm H<sub>2</sub>O  
BW (ATD)

(2) 5

my No new 114 s.w.s

Tab pendol  
H<sub>2</sub>O

syp pulmo rob  
H<sub>2</sub>O  
(PTO)

Name of Doctor: \_\_\_\_\_

Signature: \_\_\_\_\_

11

The MS  
BBS Hospital  
Abbottabad

Subj - Sick Leave

Sir,

with due respect it is stated that due to illness I am unable to perform my duties. Doctor has advised me bed rest.

Kindly grant me  
③ days Sick Leave w.e.f  
18-1-2021.

Thanks

Enul yours Sincerely

Enul Naveen

CNS BBS

HOSP. ATD

To,

19

The Medical Superintendent  
B. B. S Teaching Hospital  
Abbottabad.

Sir,

It is intimated that I have been suffering from fever, cough and headache for last few days. On deteriorating my health issue I went to CMH Abbottabad where Dr. examined me and advised me complete bed rest for 2x days with effect from 21-01-2021 to 22-01-2021.

Antecedent, you are requested to grant me 2x days leave for above mentioned dates. Med disposal sheet / rest case attached with.

Forwarded for kind approval, please.

Yours Sincerely  
Gul Rasheed  
CNS BBS Teaching  
Hosp Abbottabad  
21-1-2021.

CONFID

In Lieu of PAFM-1316(CS)

# MEDICAL CASE SHEET

13

(See instr of 52 Regs for Med Svcs of Armrd Forces Vo-II.....1978)

Serial No. In admission and disch book..... Hosp.....

No: 9006 Rank: MLO Lt Name: Hafand Far Khan Unit: PNS  
Gul Noorreen

Age: 57 yrs Svc:

Disease:

Date and time: 21/07/2011  
Condition on Admission and Progress of Case.  
(Incl complaints, present, past hist, family and personal hist, clinical exam investigation and their results and the treatment prescribed Progress- report will be written as often as is nec)

57 yo. ♀ patient  
- NO documented  
Co-Morbidities  
- IHD ⊕  
C/o:  
- sore throat  
- Fever / Headache / or  
dmg

NO SOB  
Taste / smell. OK

Aggravated by exertion  
- 800mg TCB 1x200  
- Hydril 25mg 1x200  
- PIC TCB 2x200  
/ 100 deg

812 x 02  
days

consult of  
symptoms  
persist / cont

CMP, Dr  
Samullah Khan  
Med. Off. Atd

CONFID

CMP, Dr  
Samullah Khan  
Med. Off. Atd

The MS  
BBS Hospital  
Abbottabad

14

Sub: Sick Leave

Sir,

With due respect it is stated that due to illness I am unable to perform my duties.

Doctor has advised me bed rest.

Kindly grant me Sick Leave for (05) days w.e.f 23/01/2021.

Thanks

Gul

Yours Sincerely

Gul Nusrat

CNS

BBS Hosp

Abbottabad

Date: - 23/1/2021



# AYUB TEACHING HOSPITAL, ABBOTTABAD

## Accident & Emergency Service Department

15

Book No 4096

S. No. 38

Patient ID:	Patient Name:
Patient Age:	Patient Sex:
Patient Date & Time:	Patient Mode:
OPD:	Address:
IDP Status:	Amount:

Dcmp

WEF 30/1

P

Cu

= SOB

orthopnea

1) Tb. Securis 30 P  
(C + E)

2) Tb. Ranex 500 P  
(C + E)

O/E

BP 160/100

Cu 22

Time 2 hr

B/C

ECG LBBB

old

C, 3) (C + E)

3) Tb. Ibrax 200 P  
(C + E)

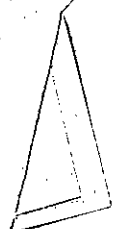
4) Tb. AS 250 P  
L 11/11/11

5) Tb. Lipitor 20 P  
L 11/11/11

6) Inj. Lasix 40mg 10 P

AYUB TEACHING HOSPITAL  
ACCIDENT & EMERGENCY UNIT  
ABBOTTABAD

Bed rest for 04 days  
we-f 23/01/2021



The M.S  
BBS Hospital  
Abbotabad

Subj: Sick Leave

Sir,

with due respect it is  
stated that due to illness I am  
unable to perform my duties.

Doctor has advised me  
bed rest.

Kindly grant me (03)  
days sick leave w.e.f. 27-1-21

Thanks

Yours Sincerely

Gul Nusrain

CNS BBS

HOSP. ATD

Date - 27-1-2021

# CMH ABBOTTABAD

## Specialist's Report

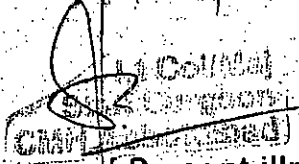
Report by spec in ..... Date.....  
 No 9006 Rank M/lt Name Asfand Yar Gul Nisve  
 Age ..... Unit PA5 Quar  
 Diagnosis.....

20/11

Sciatitis,

### 1. Complaints

Refri from sup for adu P1



### 2. History of Present illness

Rx

- Tab. Tonoflex-P

1 x OP

- Tab. Nubend forte  
1 + 1

### 3. Clinical Exam

- Tab. Cyclica 50

1 x O

Bed rest  
for 03 days.

Dr. Kamra  
Resident  
CMH Ab



The M.S  
BBS Hospital  
Abbottabad

12

Sub:- Sick Leave

Sir, with due respect it is stated that due to illness I am unable to perform my duties. Doctor has advised me bed rest for 05 days i.e. 29-1-2021.

Thanks

Yours Sincerely  
Gul Gul Nasreen  
CNS BBS Hospital  
Abbottabad  
Date:- 30-1-2021

19

OPD Prescription form

Patient Name : Gul Nasreen  
Father Name : SAIF AFZAL KHAN  
Age : 57 Year(s) 00 Month(s) 0 Day(s)  
Patient Type : REGULAR

Department : PULMONOLOGY  
Date : 29-JAN-21 10:51:52  
Dept Fee : 30  
User : ASAD KHAN  
MRNO : K0400002446893  
Invoice No : K04210175880  
Sex : Female

Investigation  
0000  
-12  
7-196000  
2  
Remarks

Penicillin - 4 dy  
Body Ache - 5 dy  
Pen Bzogen  
cough

DD Bosterus/  
Viral Fever

Ty Oxidol 1gn  $\frac{1}{2}$  B-D  
for 10dy

Ten Azomox 250  
Cis 5 - 1 - 1

Ten Paracetamol  
1 - 1 - 1

Cap Zolof 20  
1 - 1 - 1

Advise Bed Rest for 05 day  
Five day

21/01/21

درخواستہ برآمد اصلاح احوال

قلم خانہ ! مہنویہ درخواستہ ذیل ہے۔

1. یہ کہ ایک عرصہ سے اسپتال انتظامیہ اور ان کے چند مخصوص مورد اور فریڈ
2. یہ کہ اس کے بلوے جگت سے سائلہ کو یہاں BBS سے بوجہ بد غیر مالوٹے اور
3. یہ کہ عدالتی احکامات سے باوجود سائلہ کے فرالٹے منہویہ کے راہ سے دانستہ
4. یہ کہ قادیان قریب انتظامیہ کے ایما پر فریڈ متعلقہ نوٹوں کے ساتھ ملکر ڈیوٹی دوسرے
5. یہ کہ شمع گلے، اسپتال انتظامیہ اور انتظامیہ کے مخصوص سائلہ کے خلاف

الغرض

قلم خانہ

BBS CNS اسپتال ایسے آباد

1. ماہیہ 10 خانہ DC ماہیہ قلم خانہ آباد
2. دجیڈ جی ایم کوڈ آف پاکستان
3. مدد جنرل سٹیو کے بار وٹیل ایسے آباد

درخواست پر خلاف بندشہ تنخواہ

خانہ مالی! مہینہ درخواست دیا ہے۔

1۔ یہ کہ سائلہ عدالت عالیہ کے احکامات کے مطابق اپنے ڈیوٹی باقاعدگی سے سرانجام دے رہی ہے۔

2۔ یہ کہ سائلہ کو ماہ جنوری کے تنخواہ غیر قانونی طور پر خانہ کے دفتر کے طرف سے بند کر دی گئی۔ جو کہ سائلہ کے ماضی قتلے کے مترادف ہے۔ اور اس وجہ سے سائلہ ماضی سائلہ کے ساتھ ذبحہ اذیت اور کرب سے مبتلا ہے۔

اور سپریم کورٹ کے واضح احکامات ہیں کہ کسی بھی سرکاری ملازم کو تنخواہ کے بندشہ غیر قانونی اور قابلے گرفت ہے۔ جبکہ سائلہ کے غیر قانونی تبدیلیے کو عدالت عالیہ نے کالعدم قرار دے کر مقرر کر دیا۔ اور سائلہ عدالت عالیہ کے مطابق اپنے فرائض منصبی باقاعدگی سے سرانجام دے رہی ہے۔ اور سائلہ یہ سمجھتی ہے کہ خانہ کے سائلہ کے ساتھ یہ رویہ ذاتی عناد اور بددیہی پر مبنی ہے۔ اور اختیار کے ناجائز استعمال اور انتقامی کامیابی کے مترادف ہے۔ لہذا استدعا ہے کہ سائلہ کو تنخواہ جاری کرنے کے احکامات جاری کیے جائیں۔

سپریم کورٹ آف پاکستان کا حکمنامہ بابت بندشہ تنخواہ  
سامعہ لفظ درخواست ہے۔

المقدمہ  
شملہ شریفہ  
پیپہ نرنگہ پرسدنت  
BBS ہسپتال  
ایسے آباد

المرقوم 12/2/2021

درود حضرت زین العابدین علیہ السلام

درود حضرت زین العابدین علیہ السلام

ممنون درود حضرت زین العابدین علیہ السلام

1. یہ دعا اللہ تعالیٰ کے واسطے کہ ان کے ہر کام میں کامیابی ہو

کے باوجود غائب کی حالت سے سائل کو اطلاع ہو اور ان کے بارگاہ مبارک

مذائق احکامات کی وہمیاں بکسر و ایک سو اسی کے اذکار کے

استحباب و سحر و جادو کے ذائقے جائز و منکر کی تمیز و

دانتہ ایچہ نیز برکتوں سے اور ان پر کوئی بھاری بار نہ

کوشیدے دیا جاوے۔

2. یہ دعا اللہ تعالیٰ کے واسطے کہ ان کے ہر کام میں کامیابی ہو

ذائقے معاد، بدستی، انتہائی کاروائی اور فائدہ مند

کما حقہ عورتا ہے اور ماسخ کے واسطے کہ وہ

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

کریا کر کے ان کے ہر کام میں کامیابی ہو

4

30

1. ...  
 2. ...  
 3. ...  
 4. ...  
 5. ...  
 6. ...

Days	Names	Remarks
03 days	Y/N Robins	Y
18 days on 11/02 to 28/11/2021	Y/N Nails Manza C/O Nasreen	
11/2 121	C/O Nasreen CNS	
12/2/21	C/O Nasreen CNS	
100 weeks on 1/1/02 to 24/02/2021	Y/N Rashid	
03 months (Sept Oct Nov)	C/O Nasreen CNS	

4

24

8

The Chief Nursing Superintendent  
BBS Teaching Hospital,  
Abotlola

Subj: Medical Rest

Respected Madam,

With due respect it is stated  
that I have fracture of fibula +  
Ankle joint. Doctor's advise me complete  
bed rest for 2 weeks w.e.f 12<sup>th</sup> Feb  
Kindly accepted.

Thank's Yours Sincerely,  
Yr Rashid Farooq  
Date 11-02-2021

- For recorded L-O M.S for  
N/ACTION please

Signature  
CNS  
11/02/2021

25

To,  
The Chief Nursing Superintendent,  
B.B.S Teaching Hospital,  
Abotabad.

Subject: Medical Rest.

Respected Madam,

With due respect, it is stated  
that I have fracture of fibula +  
ankle joint. Doctor's advise me complete  
bed rest for 2 weeks w.e. 12th Feb.

Kindly accepted.

Thank's Yours Sincerely,

Yr Rashid Poursy

Date 11-02-2021

CNS  
- Staff -  
for comments pls.

*[Signature]*  
15/02/2021

As she is *[unclear]* agreed?  
*[Signature]*  
13/02/2021

- For *[unclear]* to my  
ACTION please:  
*[Signature]*  
CNS  
11/02/2021



40

Lady

Dr. Misbah Yousaf Qazi

MBBS, DGO, PMDC # 10603-N

Senior District Gynaecologist

D.H.Q, Teaching Hospital Haripur



پیدھی ڈاکٹر مصباح یوسف قاضی

ایم بی بی ایس ڈی جی او

سینئر ڈسٹرکٹ گائناکولوجسٹ

ڈی ایچ کیو ہسپتال ہری پور

26

الفاضی کلینک میڈیٹرنی ہوم

Name: Bensha / 13 am 30 yrs Date: 21/12/21

Beensha Clinical Record

Rx

G.P. 410  
133-27  
(S10-CMH)

A-ve

Del MC Scan  
C-idea  
myofalce

G.A. 712  
frow

Tab. Paracet  
50-50

Plac + ve  
Lop cap  
Comp  
Fetal  
calic

11/12/20

Tab. W 03ps  
141

Temp

Cap. Fibro  
1/10/21

AD  
CP  
Har/HPS  
Har

Bp 140/90

Wt 68kg

دوبارہ معائنہ

Near Sir Syed Model School, Opp Girls College  
West Circular Road, Haripur  
Ph: 0995-627700, 0313-5218113

نمبر اینڈ کیلبر 9 بجے کلینک میں تشریف لائیں

**BEFORE THE HONORABLE, KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

**COC No.76/2021**

**Service Appeal No. 766 /2021**


Mrs. Gul Nasreen other .....Appealnt /Petitioners

**"Versus"**

Medical Superintendent BBS Teaching Hospital Abbottabad others  
.....Respondents

**INDEX**

S.NO.	DETAIL OF DOCUMENTS	ANNEXURE	PAGE NO.
1	Para-wise Comments		01-02
2	Affidavit/verification		03
3	Charge assumption report of Shama Gul and arrival report	"A&B"	4-5
4	Relieving order of Gul Nasreen	"C"	06
5	Charge assumption report of Shama Gul and arrival report	"D&E"	7-8
6	Relieving order	"F"	09
7	Khyber Pakhtunkhwa Service Tribunal order dated 02/02/2021,	"G"	10-11

  
DEPONENT

**BEFORE THE HONORABLE, KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

**COC No.76/2021**

**Service Appeal No. 766 /2021**

Mrs. Gul Nasreen other .....Appealnt /Petitioners

**"Versus"**

Medical Superintendent BBS Teaching Hospital Abbottabad others  
.....Respondents

**PARA-WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1**

**Respectfully Sheweth:-**

**Preliminary Objections:-**

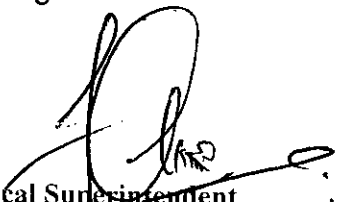
1. That the appellants did not come to the honorable Court with clean hands.
2. That the appellants have no cause of action / locus standi to file the instant petition.
3. That the instant petition is hit by laches and barred by law of limitation.
4. That the appellants have filed the instant petition just to pressurize the respondents, with malafide and to gain illegal benefits.
5. That the petition may be dismissed due to mis-joinder and non rejoinder of necessary parties.

**FACTUAL OBJECTIONS:-**

1. In-correct to the extent that the appellants instituted a service appeal in Honorable Khyber Pakhtunkhwa Service tribunal.
2. Correct to the extent that the appellants filed her appeal dated 02/02/2021, Honorable Tribunal issued directions that "the order dated 01/01/2021 and 04/01/2021 shall remain suspended, if not acted upon already", in this context, it is stated that the appellants were relieved off from her duties on 11/01/2021 as Mst. Shama Gul the newly posted Chief Nursing Superintendent submitted her arrival report and assumed the charge as per order of the competent authority. Copies enclosed as annexure A & B.

3. In reply of paras no. 3 it is submitted that the petitioner did not submitted any leave application to the Medical Superintendent up to her relieving from BBS Teaching Hospital Abbottabad on 11/01/2021.
4. Para 4 of the petitioner is incorrect; the petitioner never applied for any leave neither any application was sanction as per rules. She was relieved by the Medical Superintendent on 11/01/2021. copy of relieving order is attached as Annexure "C".
5. In correct hence denied, it is stated that on submission of arrival Mst. Shama Gul, assumed the Charge as Chief Nursing Superintendent BBS Teaching Hospital Abbottabad, dated on 02/01/2021. Copy of arrival report and charge report is attached as annexure D & E. Consequently, on 11/01/2021, Mrs. Gul Nasreen (appellant) was relieved off from her duties from BBS Teaching Hospital Abbottabad enabling her to join her new place of posting at DHQ Hospital Haripur. (Copy attached as annexure "F").
6. The appellant was relied off from her duties on 11/01/2021 before the order of Honorable Tribunal.(Documents attached as Annexure "G")
7. Para 7 is wrong and incorrect, the respondents obey the order in letter and spirit.
8. Correct and we the respondents have obeyed the order, but the petitioner herself meandered to disobey the same.
9. Para "09" is legal and needs no comments
10. In reply to the para 10, it is submitted that respondents has acted as per law and obeyed the order in letter & spirit.

It is, therefore, humbly prayed that on acceptance of the above para-wise comments/reply, the instant COC may graciously be dismissed with cost throughout.



Medical Superintendent  
BBS Teaching Hospital Abbottabad  
Respondent No. 1

## VERIFICATION/AFFIDAVIT

Verified that all the contents of the comments are true and correct to the best of my knowledge and believe and nothing has been suppressed from this Hon'able Tribunal.



Medical Superintendent  
BBS Teaching Hospital Abbottabad  
Respondent No. 1

(A)

(4)

AB  
DE

The Medical Superintendent  
BBS Teaching Hospital Abbottabad.

Subject: ARRIVAL REPORT

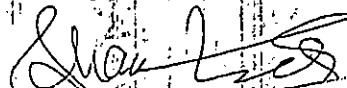
Sir,

In compliance with Health Department Khyber Pakhtunkhwa Peshawar Notification No. SOH-  
II/3-5/2021 dated 01-01-2021

I, Mst. Shama Gul D/o Malik Mir Afzal do hereby submit my arrival report for duty as Chief  
Nursing Superintendent BPS-18 today on 02/01/2021.

Please accept my arrival report accordingly

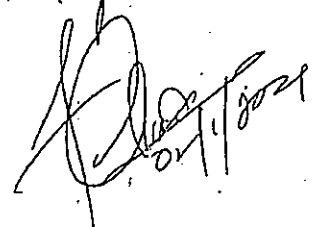
Thanking You,



Mst. Shama Gul D/o Malik Mir Afzal  
Chief Nursing Superintendent BPS-18  
BBS Teaching Hospital Abbottabad

Dated 02/01/2021

*Arrival accepted*



(B)

(S)  
AB  
DE

GS & PD KPK 293 FS.2000 P 100-18-10.2000..... (30)

GOVT: OF KHYBER PAKHTUNKHWA

CERTIFICATE OF TRANSFER OF CHARGE

Certify that I, Mst. Shama Gul D/o Malik Mir Afzal have on the Forenoon/Afternoon of this day taken over/ handed over the charge of Chief Nursing Superintendent BPS-18 of the BBS Teaching Hospital Abbottabad W/ref; to Health Department Khyber Pakhtunkhwa Peshawar notification No. SOH-11/3-5/2021 dated 01-01-2021.

Particulars of cash and importance secret / confidential documents if any, handed over are noted on the reverse:

Signature of relieved Govt: servant (Departure) \_\_\_\_\_  
Name \_\_\_\_\_

Station: Abbottabad

Designation: \_\_\_\_\_

Signature of receiving Govt: servant. (Arrival) Shama Gul

Name: Mst. Shama Gul D/o Malik Mir Afzal

Dated: 02/01/2021

Designation: Chief Nursing Superintendent BPS-18

OFFICE OF THE MEDICAL SUPERINTENDED BBS TEACHING HOSPITAL ABBOTTABAD

No: 121-25 dated Abbottabad the 02-01-2021

Copy to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary Health Govt of Khyber Pakhtunkhwa Peshawar.
3. DMS Admn BBS Teaching Hospital Abbottabad for Information.
4. District Comptroller of Accounts Abbottabad.
5. Account Officer BBS Teaching Hospital Abbottabad.
6. Personal files.

Shama Gul  
02/01/2021

Medical Superintendent  
BBS Teaching Hospital  
Abbottabad



(C)      C/F      (6) (3)

**OFFICE OF THE MEDICAL SUPERINTENDENT,**  
**BBS TEACHING HOSPITAL, ABBOTTABAD.**

**OFFICE ORDER:-**

In compliance with Health Department Khyber Pakhtunkhwa Peshawar notification No. SOH-III/3-5/2021 dated 01/01/2021.

Mrs. Gul Nasreen Sister Tutor BPS-17 is hereby relieved off from her duty as Chief Nursing Superintendent BBS Teaching Hospital Abbottabad immediately enabling her to join her new assignment at DHQ Hospital Haripur.

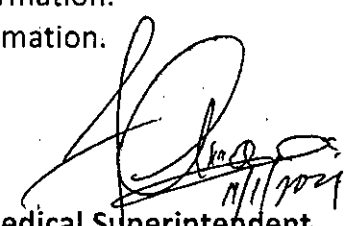
Sd/---

Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.

No: 192 - 96 Dated: 11 / 01 / 2021

Copy to the:-

1. Director General Health services Khyber Pakhtunkhwa Peshawar.
2. Section Officer III Health Department Khyber Pakhtunkhwa Peshawar.
3. Medical Superintendent DHQ Hospital Haripur for information.
4. District Accounts Officer Abbottabad/ Haripur for information.
5. Above officer for complice.

  
Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.



(D)

(7)  
AB  
DE

The Medical Superintendent  
BBS Teaching Hospital Abbottabad.

Subject: ARRIVAL REPORT

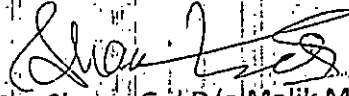
Sir,

In compliance with Health Department Khyber Pakhtunkhwa Peshawar Notification No. SOH-III/3-5/2021 dated 01-01-2021

I, Mst. Shama Gul D/o Malik Mir Afzal do hereby submit my arrival report for duty as Chief Nursing Superintendent BPS-18 today on 02/01/2021.


Please accept my arrival report accordingly

Thanking You,



Mst. Shama Gul D/o Malik Mir Afzal  
Chief Nursing Superintendent BPS-18  
BBS Teaching Hospital Abbottabad

Dated 02/01/2021

*Arrival accepted*  
  
02/01/2021

(E)

(8)

AB  
DE

GS & PD KPK 293 FS.2000 P 100-18-.10.2000..... (30)

GOVT: OF KHYBER PAKHTUNKHWA

CERTIFICATE OF TRANSFER OF CHARGE

Certify that I, Mst. Shama Gul D/o Malik Mir Afzal have on the Forenoon/Afternoon of this day taken over/ handed over the charge of Chief Nursing Superintendent BPS-18 of the BBS Teaching Hospital Abbottabad W/ref; to Health Department Khyber Pakhtunkhwa Peshawar notification No. SOH-41/3-5/2021 dated 01-01-2021.

Particulars of cash and Importance secret / confidential documents If any, handed over are noted on the reverse:

Signature of relieved Govt: servant (Departure) \_\_\_\_\_  
Name \_\_\_\_\_

Station: Abbottabad

Designation: \_\_\_\_\_

Signature of receiving Govt: servant. (Arrival) Shama Gul

Name: Mst. Shama Gul D/o Malik Mir Afzal

Dated: 02/01/2021

Designation: Chief Nursing Superintendent BPS-18

OFFICE OF THE MEDICAL SUPERINTENDED BBS TEACHING HOSPITAL ABBOTTABAD

No: 121-25 dated Abbottabad the 05-01-2021

Copy to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary Health Govt of Khyber Pakhtunkhwa Peshawar.
3. DMS Admn BBS Teaching Hospital Abbottabad for Information.
4. District Comptroller of Accounts Abbottabad.
5. Account Officer BBS Teaching Hospital Abbottabad.
6. Personal files.

Shama Gul  
02/01/2021

Medical Superintended  
BBS Teaching Hospital  
Abbottabad



(F) C/F 9 3

**OFFICE OF THE MEDICAL SUPERINTENDENT,**  
**BBS TEACHING HOSPITAL, ABBOTTABAD.**

**OFFICE ORDER:-**

In compliance with Health Department Khyber Pakhtunkhwa Peshawar notification No. SOH-III/3-5/2021 dated 01/01/2021.

Mrs. Gul Nasreen Sister Tutor BPS-17 is hereby relieved off from her duty as Chief Nursing Superintendent BBS Teaching Hospital Abbottabad immediately enabling her to join her new assignment at DHQ Hospital Haripur.

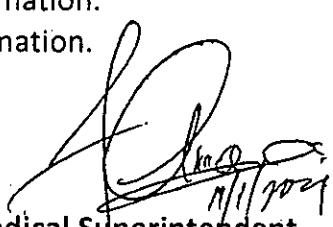
Sd/---

Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.

No: 192 - 96 Dated: 11 / 01 / 2021

Copy to the:-

1. Director General Health services Khyber Pakhtunkhwa Peshawar.
2. Section Officer III Health Department Khyber Pakhtunkhwa Peshawar.
3. Medical Superintendent DHQ Hospital Haripur for information.
4. District Accounts Officer Abbottabad/ Haripur for information.
5. Above officer for comppliance.

  
Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.

01M 06TH 2021



9  
T

10

NOTIFICATION

9  
1

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**



APPEAL NO. 766 /2021

Mst. Gul Nasreen w/o Sa id Afzal Chief Nursing Superintendent (BS-18)  
Benazir Bhutto Shaheed Teaching Hospital Abbottabad.

(APPELLANT)  
Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 1703  
Dated 29/11/2021

1. The Chief Secretary KPK, Civil Secretariat, Peshawar.
2. The Secretary to Govt: (Health) Deptt, KPK, Peshawar.
3. The Director General, health services, KP, Peshawar.
4. District account office Abbottabad.
5. The Medical Superintendent, Benazir Butto Shaheed, Teaching Hospital Abbottabad.
6. Mst Shama Gul, Nursing Instructor (BPS-17) Benazir Butto Shaheed, Teaching Hospital Abbottabad.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 01.01.2021 and 04.1. 2021 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED PREMATURELY, UTTER VIOLATION OF POSTING TRANSFER POLICY AND AGAINST THE SPOUSE POLICY, AND AGAINST REJECTION ORDER DATED 28.01.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS.

Filed to-day  
Registrar  
29/11/2021

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 01.01.2021, 04.1. 2021 and 28.01.2021, MAY BE SET ASIDE TO THE EXTENT OF THE APPELLANT BEING, PASSED PREMATURELY IN VIOLATION OF POSTING/TRANSFER & SPOUSE POLICY AND ALSO POLITICALLY MOTIVATED. THE RESPONDENT DEPTT. MAY FURTHER PLEASE BE DIRECTED NOT TO TRANSFER THE APPELLANT

**ATTESTED**

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

**OFFICE OF THE MEDICAL SUPERINTENDENT**  
**BBS TEACHING HOSPITAL ABBOTTABAD**

Tel # 0992-9310191, Fax # 0992- 9310193

Email Id: dhqabbottabad@yahoo.com

No. 802 / Estab  
Dated ATD the 06/02 2021.

The Honorable Chairman  
Khyber Pakhtunkhwa Service Tribunal  
Peshawar.

Subject: **SERVICE APPEAL NO. 766/2021**

Respected sir,

Mrs. Gul Nasreen sister Tutor BPS-17 was transferred from BBS Teaching Hospital Abbottabad to DHQ Hospital Haripur vide Health Department Khyber Pakhtunkhwa Peshawar notification no. SOH-III/3-5/2021 dated 01/01/2021. Copy attached.

On arrival of Mst. Shama Gul Chief Nursing Superintendent BBS Teaching Hospital Abbottabad on 02/01/2021, Mrs. Gul Nasreen was relieved off from her duties vide this office order No. 192-96 dated 11/01/2021. Copy enclosed.

According to the report of office Naib Qasid / daftari and record of attendance register she was absent from her duty soon after relieving her from this office (to receive her relieving order).

Mrs. Gul Nasreen appeals for the cancellation of her transfer order, which was turned down by the competent authority vide letter no. SOH-III/3-5/2021(CNS/Posting/Transfer) dated 28<sup>th</sup> January 2021, the competent authority order her to submit arrival report in DHQ Hospital Haripur at earliest.

Now Mrs. Gul Nasreen approached to Khyber Pakhtunkhwa Service tribunal in service appeal No.766/2021 on dated 29/01/2021 whereby Honorable Service Tribunal ordered dated 02/02/2021 "the operation of impugned order dated 01-01-2021 ,04-01-2021 and 28-01-2021 shall remain suspended to the extent of appellant, *if not acted upon already*".

It is further stated that Mrs. Gul Nasreen was relieved off from her duty as Chief Nursing Superintendent from BBS Teaching Hospital before her appeal in Khyber Pakhtunkhwa Service tribunal Peshawar vide this office order No. 192-96 dated 11/01/2021.

It is submitted that Health Department Khyber Pakhtunkhwa Peshawar notification no. SOH-III/3-5/2021 dated 01/01/2021 has already been actualized on 11/01/2021.

**Medical Superintendent**  
**BBS Teaching Hospital**  
**Abbott bad**

Copy to the:-

1. PS to Secretary Health Khyber Pakhtunkhwa Peshawar for information
2. PA to Director General Health services Khyber Pakhtunkhwa Peshawar for information
3. Medical Superintendent DHQ Hospital Haripur along-with copies of above for information and necessary action.

A.F.

dlc

**Medical Superintendent**  
**BBS Teaching Hospital**  
**Abbott bad**

**BEFORE THE HONORABLE, KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

**COC No.76/2021**

**Service Appeal No. 766 /2021**

Mrs. Gul Nasreen other .....Appellant /Petitioners

**"Versus"**

Mst. Shama Gul Nursing Instructor BPS-17 Benzir Bhutto Shaheed Hospital  
Abbottabad

.....Respondents

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1	Para-wise Comments		01-02
2	Affidavit/verification		03
3	Notification No. SOH-II/3-5/2021 dated 01-01-2021	"A"	04
4	Arrival report of respondent	"B"	05
5	Charge Assumption report of respondent	"C"	06

  
DEPONENT

**BEFORE THE HONORABLE, KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

**COC No.76/2021**

**Service Appeal No. 766 /2021**

Mrs. Gul Nasreen other .....Appellant /Petitioners

"Versus"

Mst. Shama Gul Nursing Instructor BPS-17 Benzir Bhutto Shaheed Hospital  
Abbottabad

.....Respondents

**PARA-WISE COMMENTS ON BEHALF OF RESPONDENT NO. 2**

**Respectfully Sheweth:-**

**Preliminary Objections:-**

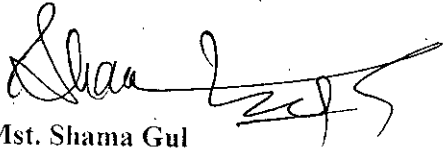
1. That the appellant did not come to the honorable Court with clean hands.
2. That the appellant has no cause of action / locus standi to file the instant petition.
3. That the instant petition hit by laches and barred by law of limitation.
4. That the appellant have been filed the instant petition just to pressurize the respondents.
5. That the petition may be dismissed due to non-joinder and non rejoinder of necessary parties.

**FACTUAL OBJECTIONS:-**

1. Correct to the extent that the appellant file a service appeal in Honorable Khyber Pakhtunkhwa Service tribunal.
2. No comments
3. In reply of para No. 3 it is stated that the competent authority i.e. Secretary Health Khyber Pakhtunkhwa Peshawar vide notification No. SOH-II/3-5/2021 dated 01-01-2021 posted the respondent as Chief Nursing Superintendent BBS Teaching Hospital Abbottabad.  
Accordingly, respondent have submitted her arrival report for duty as Chief Nursing Superintendent BBS Teaching Hospital Abbottabad on 02/01/2021. The respondent merely acted upon the order of competent authority.
4. No comments

5. No comments
6. Para "6" is legal and needs no comments.
7. Para "7" is legal and needs no comments.
8. Para "8" is legal and needs no comments.
9. Para "9" is legal and needs no comments.
10. Para "10" is legal and needs no comments.

It is, therefore, humbly prayed that on acceptance of the above para-wise comments/reply, the instant COC may graciously be dismissed with cost throughout:



**Mst. Shama Gul**  
**Chief Nursing Superintendent**  
**BBS Teaching Hospital Abbottabad**  
**Respondent No. 2**



## VERIFICATION/AFFIDAVIT

Verified that all the contents of the comments are true and correct to the best of my knowledge and believe and nothing has been suppressed from this Hon'able Tribunal.

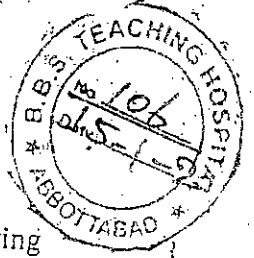


**Mst. Shama Gul**  
**Chief Nursing Superintendent**  
**BBS Teaching Hospital Abbottabad**  
**Respondent No. 2**

**TO BE SUBSTITUTED BY THE SAME NO & DATE**

**GOVT. OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

Dated the Peshawar 01-01-2021



**NOTIFICATION**

No. SOH-III/3-5/2021

The Competent Authority is pleased to order following postings/transfers of Officers with immediate effect in the public interest:

S.No	Name & Designation	From	To
1.	Mst. Shama Gul, Nursing Instructor (BS-17).	BBS Teaching Hospital, Abbottabad.	Chief Nursing Superintendent (BS-18), BBS Teaching Hospital, Abbottabad in her own pay & scale. Vice Sr. 02.
2.	Mrs. Gul Nasreen, Chief Nursing Superintendent (BS-18 a.c.b).	BBS Teaching Hospital, Abbottabad.	Chief Nursing Superintendent (BS-18), DHQ Hospital, Haripur against the vacant post.

Secretary to Govt. of Khyber Pakhtunkhwa  
Health Department

Ends of even No and Date.

Dated 04-01-2021

Copy forwarded to the:-

1. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
2. Medical Superintendent, BBS Teaching Hospital, Abbottabad.
3. Medical Superintendent, DHQ Hospital, Haripur.
4. District Accounts Officers, Abbottabad & Haripur.
5. The Deputy Director (I.T) Health Department.
6. PS to Secretary Health, Khyber Pakhtunkhwa.
7. PS to Special Secretary Health, Khyber Pakhtunkhwa.
8. Officers concerned.

*Best of luck*

SECTION OFFICER III

*Actual on 11/1/2021*  
*MS 1371/2021*

*Ru*  
*Amn the error*  
*after accordingly*

(A)

(4)

AB  
DE

The Medical Superintendent  
BBS Teaching Hospital Abbottabad.

Subject: ARRIVAL REPORT

Sir,

In compliance with Health Department Khyber Pakhtunkhwa Peshawar Notification No. SOH-III/3-5/2021 dated 01-01-2021

I, Mst. Shama Gul D/o Malik Mir Afzal do hereby submit my arrival report for duty as Chief Nursing Superintendent BPS-18 today on 02/01/2021.

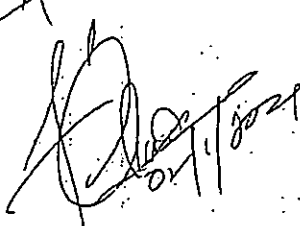
Please accept my arrival report accordingly

Thanking You,



Mst. Shama Gul D/o Malik Mir Afzal  
Chief Nursing Superintendent BPS-18  
BBS Teaching Hospital Abbottabad

Dated 02/01/2021

*Arrival accepted*  
  
02/01/2021

(B) GS & PD KPK 293 FS.2000 P 100-18-,10.2000..... (30)

GOVT: OF KHYBER PAKHTUNKHWA

CERTIFICATE OF TRANSFER OF CHARGE

Certify that M<sup>r</sup>, Mst. Shama Gul D/o Malik Mir Afzal have on the Forenoon/Afternoon of this day taken over/ handed over the charge of Chief Nursing Superintendent BPS-18 of the BBS Teaching Hospital Abbottabad W/ref; to Health Department Khyber Pakhtunkhwa Peshawar notification No. SOH-41/3-5/2021 dated 01-01-2021.

Particulars of cash and importance secret / confidential documents if any, handed over are noted on the reverse:

Signature of relieved Govt: servant (Departure) \_\_\_\_\_

Name \_\_\_\_\_

Station: Abbottabad

Designation: \_\_\_\_\_

Signature of receiving Govt: servant. (Arrival) \_\_\_\_\_

Name: Mst. Shama Gul D/o Malik Mir Afzal

Dated: 02/01/2021


Designation: Chief Nursing Superintendent BPS-18

OFFICE OF THE MEDICAL SUPERINTENDED BBS TEACHING HOSPITAL ABBOTTABAD.

No: 121-25 dated Abbottabad the 02-01-2021

Copy to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar
2. PS to Secretary Health Govt of Khyber Pakhtunkhwa Peshawar
3. DMS Admn BBS Teaching Hospital Abbottabad for Information
4. District Comptroller of Accounts Abbottabad
5. Account Officer BBS Teaching Hospital Abbottabad
6. Personal files.

  
Medical Superintendent  
BBS Teaching Hospital  
Abbottabad