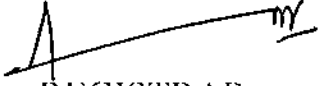


FORM OF ORDER SHEET

Court of _____

Case No. - _____ **215/2023**


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/1/2023	<p>The appeal of Mr. Ibrar Ahmad resubmitted today by Mr. Amanullah Pirzada 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. Ibrar Ahmad Ex-Constable Belt no. 2266 Elite Force Khyber Pakhtunkhwa received today i.e. on 6.01.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.


No. 108 /S.T,

Dt. 9/01 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amanullah Pirzada Ad.
High Court Pesh.

Note: Re-Submitted after necessary and Required documents.


24-1-2023

BEFORE THE LEARNED SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No 215 /2023

Ibrar Ahmad.....Appellant

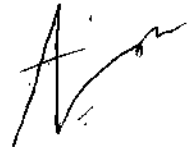
V E R S U S

Govt of KPK & others Respondents

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal		1 - 7
2.	Affidavit & addresses of Parties		8
3.	Application for condonation of delay along with affidavit		9 - 11
4.	Copy of Application and all Medical Documents of the Appellant	A	12 - 31
5.	Copy of the Impugned dismissal Order dated 26.01.2022	B	32
6.	Copy of Departmental Appeal and Order dated 10.05.2022	C	33
7.	Copy of Revision Petition	D	34 - 35
8.	Wakalat Nama		36

Appellant
Through:



AMAN ULLAH PIRZADA

Advocate

High Court Peshawar

Cell # 0300-5818228

Dated:- 04.01.2023

P - ①

BEFORE THE LEARNED SERVICE TRIBUNAL

KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No 215 /2023

Ibrar Ahmad, Ex-Constable Belt No. 2266, Elite Force
Khyber Pakhtunkhwa S/o Shahid Israr R/o Matta
Wadigram Katlang District Mardan.

.....Appellant

VERSUS

1. Govt of KPK Through Home Secretary Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
3. Additional Inspector General of Police, Elite Force Khyber Pakhtunkhwa, Peshawar.
4. Superintendent of Police Headquarters, Elite Force, Khyber Pakhtunkhwa, Peshawar.
5. Superintendent of Police, Security EPTC, Nowshera.
6. District Police Officer, Mardan.

.....Respondents

SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED OFFICE
ORDER DATED 26.01.2022 WHEREBY THE
APPELLANT WAS DISMISSED FROM SERVICE
AGAINST WHICH THE DEPARTMENTAL APPEAL
WAS FILED BY THE APPELLANT WHICH WAS

P - (2)

- DISMISSED ON 10.05.2022 ON THE GROUNDS OF TIME LIMITATION I.E TIME BARRED BY 03 MONTHS, THEN THE APPELLANT SUBMITTED THE REVISION PETITION TO THE WORTHY HOME SECRETARY KP PESHAWAR.

Prayer in Appeal:

On acceptance of this Appeal, the Impugned Dismissal Order dated 26.01.2022 Passed by the Respondent No 2 whereby the respondent No 2 imposed major penalty of dismissal from Service of the Appellant may kindly be Set aside, declared illegal, without lawful authority and in consequence whereof the Appellant may graciously be re-instated in his services from the date of infliction of punishment with all back benefit and consequential relief etc.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

1. That the Appellant is the peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
2. That briefly stated the fact relevant for the purpose of this Appeal are that the Appellant was appointed as Constable and awarded Belt No. 2266 in the year 2015 in Respondents Department and since then the Appellant was performing his duties with great

D - (3)

zeal & zest and with full devotion with no complaint whatsoever by any means.

3. That in the year 2021, the appellant was seriously ill and was suffering from Kidney diseases and was unable to continue his duty due to the severe illness, the Appellant remained absent from his duty, however the appellant moved so many Applications the Respondents and had also submitted all his medical documents / record before the Respondents and was requested to his high ups for long leave due to severe illness of the Appellant, but the same not entertained and the Respondents does not given any heed to the Applications of the Appellant. **(Copy of Application and all Medical Documents of the Appellant are attached as annexure A)**
4. That thereafter the Respondents had illegally, unlawfully, without lawful authority passed the Impugned Order dated 26.01.2022 whereby the Respondent No 2 had imposed Major Penalty of Dismissal from service upon the Appellant. **(Copy of the Impugned dismissal Order dated 26.01.2022 is attached as annexure B)**
5. That the appellant being aggrieved, filed Departmental Appeal before the concerned Authority, which was dismissed by the respondents vide Impugned Office Order dated 10.05.2022.

P-4

(Copy of Departmental Appeal and Order dated 10.05.2022 is attached as annexure C)

6. That thereafter the Appellant filed revision petition before the Respondent No 1 but without any fruitful result. **(Copy of Revision Petition is attached as annexure D)**
7. That the Appellant feeling aggrieved from the acts of Respondents, having no other adequate and efficacious remedy, approaches this Hon'ble Tribunal, on the following grounds inter alia:

GROUND:-

- A) That the Appellant is peaceful and law abiding citizens of Islamic Republic of Pakistan and are fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That it is settled law that during departmental proceeding inquiry officer shall issue charge sheet, statement of allegations, show cause notice etc to the Civil Servant but in this case, no such rules were followed which shows the malafide, discrimination of Respondents and the entire proceedings are against the law, rules and constitution, thus liable to be set aside and declared illegal.

P - (5)

- C) That no such regular inquiry has been carried out by the Respondent Department against the Appellant in order to establish the charges levelled against the Appellant which was mandatory under the law, if so no such copy of inquiry has been supplied to the Appellant.
- D) That the acts of the Respondents of not following the relevant rules, regulations which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- E) That the fundamental right of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- F) That the Appellant from his time of first appointment till now is performing his duties without any break.
- G) That vested rights have been accrued in favour of the Appellant because he was performing his duties efficiently and with devotion and also without any complaint from any quarter.
- H) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

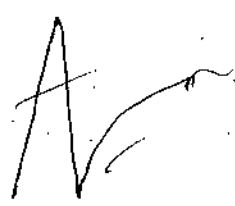
P - 6

PRAYER:-

It is, therefore, most humbly prayed that, **On acceptance of this Appeal, the Impugned Dismissal Order dated 26.01.2022 Passed by the Respondent No 2 whereby the respondent No 2 imposed major penalty of dismissal from Service of the Appellant may kindly be Set aside, declared illegal, without lawful authority and in consequence whereof the Appellant may graciously be re-instated in his services from the date of infliction of punishment with all back benefit and consequential relief etc.**

Appellant

Through:



AMAN ULLAH PIRZADA
Advocate
High Court Peshawar

Dated:- 04.01.2023

P (7)

BEFORE THE LEARNED SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No _____/2023

Ibrar Ahmad.....Appellant

VERSUS

Govt of KPK & others Respondents

AFFIDAVIT

I, Ibrar Ahmad, Ex-Constable Belt No. 2266; Elite Force Khyber Pakhtunkhwa S/o Shahid Israr R/o Matta Wadigram Katlang District Mardan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

DEPONENT

P - (8)

BEFORE THE LEARNED SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No _____/2023

Ibrar Ahmad.....Appellant

VERSUS

Govt of KPK & others Respondents

ADDRESSES OF PARTIES

APPELLANT

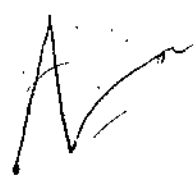
Ibrar Ahmad, Ex-Constable Belt No. 2266, Elite Force
Khyber Pakhtunkhwa S/o Shahid Israr R/o Matta
Wadigram Katlang District Mardan.

RESPONDENTS

1. Govt of KPK Through Home Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commandant Elite Force Khyber Pakhtunkhwa, Peshawar.
3. Additional Inspector General of Police, Elite Force Khyber Pakhtunkhwa, Peshawar.
4. Superintendent of Police Headquarters, Elite Force, Khyber Pakhtunkhwa, Peshawar.
5. Superintendent of Police, Security EPTC, Nowshera.
6. District Police Officer, Mardan.

Appellant

Through:



AMAN ULLAH PIRZADA
Advocate
High Court Peshawar

Dated:- 04.01.2023

P - 9

BEFORE THE LEARNED SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No _____/2023

Ibrar Ahmad.....Appellant

VERSUS

Govt of KPK & others Respondents

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

1. That the above noted Service Appeal is filed by the Appellant before this Hon'ble Tribunal, in which no date of hearing has yet been fixed.
2. That the Departmental Appeal of the Appellant was dismissed on 10.05.2022, which was impugned by the Appellant by filing revision Petition before the Worthy Home Secretary KP Peshawar, moreover the Appellant is seriously ill and suffering from Kidney Diseases, due to which the Appellant was unable to approach the competent Court / Tribunal for filing of instant Appeal.

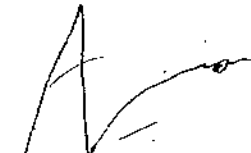
P - (10)

3. That the absence of the Appellant was neither willful not intentional.
4. That valuable rights of the Appellant is involved in the case in question.
5. That the law otherwise favour the decision of cases on merit.
6. That there is no legal bar on acceptance of the instant Application.

It is, therefore, most humbly prayed that on acceptance of this application, the delay, if any, may kindly be condoned in the interest of justice.

Appellant

Through:



AMAN ULLAH PIRZADA

Advocate

High Court Peshawar

Dated:- 04.01.2023

P - (11)

BEFORE THE LEARNED SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No _____/2023

Ibrar Ahmad.....Appellant

VERSUS

Govt of KPK & others Respondents

AFFIDAVIT

I, Ibrar Ahmad, Ex-Constable Belt No. 2266, Elite Force Khyber Pakhtunkhwa S/o Shahid Israr R/o Matta Wadigram Katlang District Mardan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

DEPONENT

Urologist

Dr. Muhammad Irfan

Gold Medalist

MBBS (KMC), FCPS-II (Urology)

Institute of Kidney Disease

Hayat Abad Medical Complex, Peshawar

12

هوالتانی

نوٹ: پرانے سواتھ ضرور لائیں

"A" Ama

یورالوجسٹ

ڈاکٹر محمد عرفان

ایم بی بی ایس

ایف سی پی ایس (یورالوجی)

ماہر امراض گردہ، پتھری، مٹانہ، پراسٹیت

Name Ihsan Khan Age 26 Sex M Date 11/10/21

Clinical Record:

Genie
Lump
Kebab
Cancer
Bowel
malignant

Ref
BSP / 100

100
CBT
1000 K/10
And C/10

- Wj Rndof
- Wj Rndof
- Wj Rndof
- Wj Rndof

Wj Rndof
Wj Rndof
Wj Rndof
Wj Rndof

Hayat Abad Medical Center
Peshawar

Cranium
Caudex

Not Valid! For Court

0336-5953186 / 0334-8414097

الدين ميديكل سنٹر اونڈر ڈوڑ مین بازار کابلنگ



14



ehman Clinical Laboratory

11/11/2021

Patient Name: IBRAR

Registration Date: 11/11/2021

Age / Sex: Years MALE

Conduct At: R M C

Parameter	Result	Reference range
Haemoglobin	14.4	M 14.0---17.0 g/dl F 11.5---16.0 g/dl
Total Leukocyte count	17,800	4000---11000 /Cmm
TRBC Red blood cell	5.3	M 4.50--5.50 F 3.80--4.80 x10 ⁶ /μL
HCT (PCV) Hematocrit volume	45.0	M 40.0---50.0 F 36.0---46.0 %
MCV Mean RBC volume	83.8	80---101 fL
MCH Mean RBC Hemoglobin	24.9	26---32 pg
MCHC Mean Hemoglobin Concentration	29.7	32---36 g/Dl
PLATLET COUNT	429,000	150,000---450,000 /Cmm
Neutrophils	80	40--70 %
Lymphocytes	10	40--45 %
Eosinophils	02	01--06 %
Monocytes	08	01--10 %
Basophiles		Up To 1 %
MP	ICT METHOD	

Taj Muhammad Market OPP MCB Bank
Near Sahib Zaada Petrol Pump Katlang

Not Valid For Court

0348-2041847 | 0315-9554923

Urologist

Dr. Muhammad Irfan

Gold Medalist

MBBS (KMC), FCPS-II (Urology)

Institute of Kidney Disease

Hayat Abad Medical Complex, Peshawar



نوٹ: پرانا نسخہ ساتھ ضرور لائیں

15

یورالوجسٹ

ڈاکٹر محمد عرفان

ایم بی بی ایس

ایف سی بی ایس (یورالوجی)

ماہر امراض گردہ، پتھری، مثانہ، پراسٹیت

Name Irfan Khan Age 24 Sex M Date 13/12/11

Clinical Record

Penicillin 400

1300 p
1300/80

4/6 of Kaval
Dance

Now
Med (1/8)

VB

Neutral for 4p

VB

Ammonia 4p
acid 0

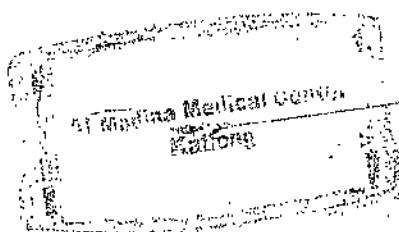
VB

Chloride 4p

VB

Rosol 4p

200 4/5 0



معائنہ بروز اتوار

Not Valid ! For Court

0336-5953186 / 0334-8414097

الدینہ میڈیکل سنٹر اونڈر چوڑو روڈ مین بازار کاتنگ

Urologist

Dr. Muhammad Irfan

Gold Medalist

MBBS (KMC), FCPS-II (Urology)

Institute of Kidney Disease

Hayat Abad Medical Complex Peshawar



نوٹ: پرانا نسخہ ساتھ ضرور لائیں

17

یورالوجسٹ

ڈاکٹر محمد عرفان

ایم بی بی ایس

ایف سی پی ایس (یورالوجی)

ماہر امراض گردہ، پتھری، مثانہ، پراسٹیت

Name Iqbal Ahmad Age 24 Sex M Date 12/12/2018

Clinical Record

Renal later
Bunif
michrotra
Abdominal
Bunif

135/80

B.P.
H.C.

W/S Abad

C.B.C.

Urine M/E

Tb

left eye Staph
Micro ①

Tb

Leishmania leaf
A - B

Tb

Neurospora

Tb

Parasitology
Micro ②

Van-Max

1 - 1

معائنہ بروز اتوار

Not Valid! For Court

0336-5953186 / 0334-8414097

الدینہ میڈیکل سنٹر لوڈ خور روڈ مین بازار کابلنگ



SHAKEEL

Medical Lab & Diagnostic Center



18

Patient Name :	IBRAR	#	Date	29/12/2021
Referred by :		#	Sex	M
Test Required :	CBC	#	Lab I D	2019060113

Complete Blood Count

Analyte	Result	Reference Range
Haemoglobin	14.3	M 14.0---17.0 g/dl F. 11.5--- 16.0 g/dl
Total Leucocyte count	13,700	4000---11000 /cmm
TRBC Red blood cell	4.3	M 4.50--5.50 F 3.80--4.80 x10 ⁶ /μL
HCT (PCV) Hematocrit value	36.2	M 40.0---50.0 F 36.0---46.0 %
MCV Mean RBC volume	82.5	80---101 fL
MCH Mean RBC Haemoglobin	26.4	26 ---32 pg
MCHC Mean Haemoglobin Concentration	32.0	32---36 g/dL
PLATLET COUNT	164,000	1,50,000 ---- 4,00,000 /Cmm
Differential Leucocyte count		
Neutrophils	60	40--70 %
Lymphocytes	30	40--45 %
Monocytes	02	01--06 %
Eosinophils	08	01--10 %
Basophils		Up To 1 %

MALARIA

ict method

0312-0915853

0344-1918491

شکیل میڈیکل سنٹر لونڈ خور و ڈنہر غاڑہ کائنگ رابطہ نمبر:

0336-5953186 / 0334-8414097

ال دین میڈیکل سنٹر لونڈ خور و ڈنہر غاڑہ کائنگ



SHAKEEL

Medical Lab & Diagnostic Center



19

Patient Name: IBRAR

Registration Date: 29/12/2021

Age / Sex: Year/MALE

Conduct At: R M C LAB

Reference: Reaction

Reporting: R M C LAB

Consultant:

Sample Location: R M C LAB

URINE ROUTINE EXAMINATION

TEST	RESULT	NORMAL RANGE
PHYSICAL EXAMINATION		
COLOUR	PALE YELLOW	PALE YELLOWISH
APPEARANC	CLEAR	CLEAR
SP- GRAVITY	QNS	
PH (REACTION)	ALKALINE	ACIDIC

CHEMICAL EXAMINATION

ALBUMIN	NIL	/ NIL
SUGAR	NIL	NIL

MICROSCOPIC EXAMINATION

PUS CELLS	NUMEROUS	/HPE	02-----03/HPE
RBC,S	NUMEROUS	/HPE	01-----02/HPE
EPITHELIAL CELLS	OCCASIONAL	/HPE	A FEW
CALCIUM OXALATE	NIL	/HPE	OCCASIONAL
AMORPHUS URATES	NIL		NIL
AMORPHUS PHOSOHATE	NIL		NIL

0312-0915853
0344-1918491

شکیل میڈیکل سنٹر لونڈخوڑو ڈھیر غاڑہ کالنگ رابطہ نمبر:

0336-5953186 / 0334-8414097

الدين ميديكل سنٹر لونڈخوڑو ڈھیر غاڑہ کالنگ

Urologist

Dr. Muhammad Irfan

Gold Medalist

MBBS (KMC), FCPS-II (Urology)

Institute of Kidney Disease

Hayat Abad Medical Complex, Peshawar



نوٹ: پرانا نسخہ ساتھ ضرور لائیں

20

یورالوجسٹ

ڈاکٹر محمد عرفان

ایم بی بی ایس

ایف سی پی ایس (یورالوجی)

ماہر امراض گردہ، پتھری، مثانہ، پراسٹیٹ

Name: Irfan Ahmad Age: 26 Sex: M Date: 15/1/23

Clinical Record

Kidney Calc
Bony M...
Bony M...

FB Left Soap

FB Keestip...
FB P...
FB P...

Bony
11/1/23
1/23

Cran. Max
Sacra

U.../K...
U.../K...

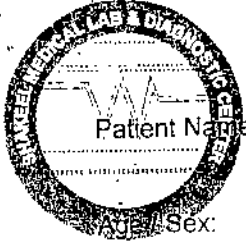
Follow up

معاخذہ بروز اتوار

Not Valid ! For Court

0336-5953186 / 0334-8414097

المدینہ میڈیکل سنٹر لوہنہ خورڈو مین بازار کائنگ



SHAKEEL



Registration 15/01/2022
Medical Lab & Diagnostic Center

Patient Name:

RRAR

Age / Sex:

Year/MALE

Conduct At:

R M C LAB

Reference:

Reaction

Reporting

R M C LAB

Consultant:

Sample Location:

R M C LAB

21

URINE ROUTINE EXAMINATION

TEST	RESULT	NORMAL RANGE
PHYSICAL EXAMINATION		
COLOUR	PALE YELLOW	PALE YELLOWISH
APPEARANC	CLEAR	CLEAR
SP-GRAVITY	QNS	
PH (REACTION)	ALKALINE	ACIDIC

CHEMICAL EXAMINATION

ALBUMIN	NIL	NIL
SUGAR	NIL	NIL

MICROSCOPIC EXAMINATION

PUS CELLS	25-----30	/HPE	02-----03/HPE
RBC.S	15-----20	/HPE	01-----02/HPE
EPITHELIAL CELLS	OCCASIONAL	/HPE	A FEW
CALCIUM OXALATE	NIL	/HPE	OCCASIONAL
AMORPHUS URATES	NIL		NIL
AMORPHUS PHOSPHATE	NIL		NIL

LAB TECHNICIAN _____

شکیل میڈیکل سنٹر لوہد خور روڈ منہر غاڑہ کالنگ رابطہ نمبر: 0312-0915853 / 0344-1918491

0336-5953186 / 0334-8414097

شکیل میڈیکل سنٹر لوہد خور روڈ منہر غاڑہ کالنگ

Urologist

Dr. Muhammad Irfan

Gold Medalist

MBBS (KMC), FCPS-II (Urology)

Institute of Kidney Disease

Hayat Abad Medical Complex, Peshawar



نوٹ: پرانا نسخہ ساتھ ضرور لائیں

22

یورالوجسٹ

ڈاکٹر محمد عرفان

ایم بی بی ایس،

ایف سی پی ایس (یورالوجی)

ماہر امراض گردہ، پتھری، مثانہ، پراسٹیٹ

Name

Dobler Ahmad

Age

Sex

M

Date

27/11/21

Clinical Record

fever
MP

B.P 130/80

Pulse 75/min

fever 99

Urine R/B

CBC
W/B Abax

Co Trans Max
Ezetrol

Co Spp dexobrom
Co Spp

Co Spp liposol

معائنہ بروز التوار

Not Valid ! For Court

0336-5953186 / 0334-8414097

الدين، ميڈیکل سنٹر لونڈ خور وڈ مین بازار کاشنگ



SHAKEEL

Medical Lab & Diagnostic Center



23

Patient Name : IBRAR	#	Date	27/01/2022
Referred by	#	Sex	M
Test Required : CBC	#	Lab I D	2019060113

Complete Blood Count

Analyte	Result	Reference Range
Haemoglobin	14.7	M 14.0---17.0 g/dl F. 11.5--- 16.0 g/dl
Total Leucocyte count	10,700	4000---11000 /cmm
TRBC Red blood cell	4.1	M 4.50--5.50 F 3.80--4.80 x10 ⁹ /μL
HCT (PCV) Hematocrit value	40.2	M 40.0---50.0 F 36.0---46.0 %
MCV Mean RBC volume	80.1	80---101 fL
MCH Mean RBC Haemoglobin	25.4	26 ---32 pg
MCHC Mean Haemoglobin Concentration	31.0	32---36 g/dL
PLATLET COUNT	264,000	1,50,000 ---- 4.00,000 /Cmm
Differential Leucocyte count		
Neutrophils	59	40--70 %
Lymphocytes	31	40--45 %
Monocytes	02	01--06 %
Eosinophils	08	01--10 %
Basophils		Up To 1 %

MALARIA

lct method

0312-0915853
0344-1918491

شکیل میڈیکل سنٹر لوہنڈو خور وڈنہر غاڑہ کا ٹنگ رابطہ نمبر:

0336-5953186 / 0334-8414097

ال دینہ میڈیکل سنٹر لوہنڈو خور وڈنہر غاڑہ کا ٹنگ



SHAKEEL

Medical Lab & Diagnostic Center



24

Patient Name: IBKAR Registration Date: 27/01/2022
Age / Sex: Year/MALE Conduct At: R M C LAB
Reference: Reaction Reporting: R M C LAB
Consultant: Sample Location: R M C LAB

URINE ROUTINE EXAMINATION

TEST	RESULT	NORMAL RANGE
PHYSICAL EXAMINATION		
COLOUR	PALE YELLOW	PALE YELLOWISH
APPEARANCE	CLEAR	CLEAR
SP-GRAVITY	QNS	
PH (REACTION)	ALKALINE	ACIDIC

CHEMICAL EXAMINATION

ALBUMIN	NIL	NIL
SUGAR	NIL	NIL

MICROSCOPIC EXAMINATION

PUS CELLS	06-----08	/HPE	02-----03/HPE
RBC,S	08-----10	/HPE	01-----02/HPE
EPITHELIAL CELLS	OCCASIONAL	/HPE	A FEW
CALCIUM OXALATE	NIL	/HPE	OCCASIONAL
AMORPHUS URATES	NIL		NIL
AMORPHUS PHOSPHATE	NIL		NIL

0312-0915853
0344-1918491

شکیل میڈیکل سنٹر لوئر خورڑ روڈ نہر غاڑہ کالنگ رابطہ نمبر

0336-5953186 / 0334-8414097

انڈیا میڈیکل سنٹر لوئر خورڑ روڈ مین بازار کالنگ

AL-RAZI MEDICAL CENTER

Lund Khwar Road Main Bazar Katlang

0342-8253680



Name: Hyar Ahmad

Age: 26/8 Sex: M

Date: 20/9/21

Clinical Record

Right eye pain
increasing in intensity
since 1 week
frequency of
discharge

25

✓ Anomalous copy

✓ Salicyl-glycerol

cup Trommel plate

Crem more Sachse

ultra sound
web x-ray
within 12/8

Urologist

Dr. Muhammad Ali

MBBS

FCPS (Urology Institute of Kidney Diseases

Hayat Abad Medical Complex Pesh.)



PATIENT #



26/09/2021

26

Rehman Clinical Laboratory

Patient Name: IBRAR

Registration Date: 26/09/2021

Age / Sex: Years(S)MALE

Conduct At: R M C

Reference: KIN

Reporting

R M C LAB

URINE ROUTINE EXAMINATION

PHYSICAL EXAMINATION RESULT NORMAL RANGE

PHYSICAL EXAMINATION	RESULT	NORMAL RANGE
COLOUR	PALE YELLOW	PALE YELLOWISH
APPEARANCE	CLEAR	CLEAR
SP- GRAVITY	QNS	
PH (REACTION)	ALKALINE	ACIDIC

CHEMICAL EXAMINATION

ALBUMIN	NIL	NIL
SUGAR	NIL	NIL

MICROSCOPIC EXAMINATION

PUS CELLS	NUMEROUS	/HPE	02-----03/HPE
RBC,S	NUMEROUS	/HPE	01-----02/HPE
EPITHELIAL CELLS	OCCASIONAL	/HPE	A FEW
CALCIUM OXALATE	NIL	/HPE	OCCASIONAL
AMORPHUS URATES	NIL		NIL

Taj Muhammad Market OPP MCB Bank
Near Sahib Zaada Petrol Pump Katlang

Not Valid For Court

0348-2041847 | 0315-9554923

AL-RAZI MEDICAL CENTER

7 Lund Khwar Road Main Bazar Katlang

0342-8253680



me: 12/20/21 Age: 26 Sex: M Date: 25/10/21

Normal Record

R

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Hematuria
Bleeding per urethra
No pain

3210 ————— 1x1 BA
Cranial. 400mg

3210 ————— 1x1 GAT
Spinalise

3210 ————— 1x1 GAT
Trombol. 100mg

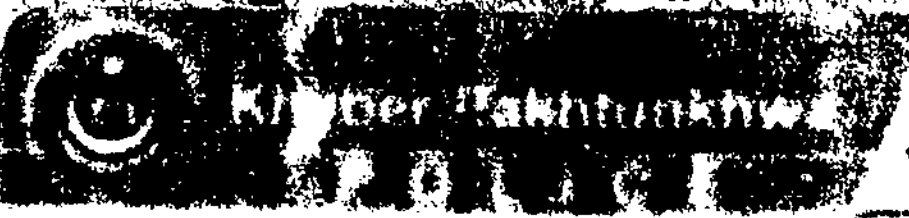
Urea 12.5
Abd. US (KUB)
KUB re-very

3210 ————— 1x1 BA
Cran. more Sack

3210 ————— 1x1 BA
U-citrat
(3) 100mg

Urologist
Dr Muhammad Irfan
MBBS
FCPS (Urology Institute of Kidney Diseases
Hayat Abad Medical Complex Pesh.)

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Roll No. 557

Ibrar Ahmad
Constable



Roll No. 330

Date of Appointment 23-12-2015

حکومت پاکستان
قومی شناختی کارڈ
16:01-0644470-1



نام: ابرار احمد
جنس: مرد
وفاقیہ: قائد اعظم
تعلقہ: کئی نہیں

تاریخ پیدائش: 08/08/1995

مسماواتا جہور

(30)

Father Name **Shahid Israr**
 CNIC No **16101-0644470-1**
 Date of Birth **08-08-1996**
 Contact No **9344-8092093**
 Emergency No **9341-8039137**
 Address **Village Hadigram P/O Katiang District**
Mardan

Barcode
Serial



POLICE



شناختی نمبر: 16101-0644470-1 خاندان نمبر: SR6F9F
 موجودہ پتہ: ست اوڈیگرام، کاتینگ، ڈاکوٹہ، کاتینگ، ضلع مردان

سنگل پتہ: ایسا

تاریخ ترمیم: 03/03/2024
 تاریخ اجراء: 03/03/2014
 تمشدہ کارڈ لئے پروفیشنل ایسٹر ٹیکنس میں ال دیں



خدمت جناب SP سیکورٹی صاحب EPTC نوشہرہ

A

جناب عالی (31)

12306-12301 مد نمبری 5747 مورخہ 29/02/09

حوالہ چارج شیٹ نمبری

تذرش لیجاتی ہے کہ سائل بدوران ایلیٹ ٹورس قمر ددی
تعلیف کنٹرول سے بڑھتی تو سائل نے ڈائریکٹری طرف رجوع
کیا بدوران علاج سائل کو بہتہ چلا کہ سائل نے گردے میں
پتھریا ہیں جبکہ علاج بہت ضروری تھا تو سائل نے ٹولوں
کے مشورے سے گردے کے بڑے ڈاکٹر پروفیسر محمد عرفان
صاحب سے علاج معالجہ شروع کیا جلی میڈیکل پریچس اس
میں ٹیج کرنا ہونا ڈاکٹر نے سائل کو مشورہ دیا کہ وہ مہلکی
بیڈ ریسٹ رہیں اور اسے علاوہ خوبات پر ہی پابندی
نقادی تالیہ سائل کا علاج جلد از جلد بعد سے سائل اپنا
ڈیوٹی جوائن کریں۔

جناب عالی!

سائل ایک سینیئر خاندان سے تعلق رکھتا ہے اور
اپنے خاندان کا واحد لغیل بھی ہے سائل کی غیر خاص
لغی قعداً عمداً نہیں تھی لہذا آپ صاحبان سے تذرش
لیجاتی ہے کہ سائل کے ساتھ رحم والا معاملہ کرے سائل
کے غیر حاضر کو رخصت میں شمار کرے مثلاً فرمائیں
آپ کا تعداد و فوانید دار لنسٹیل ابراز احمد بلٹ نمبر 2266



Office of the Deputy Commandant
Elite Force Khyber Pakhtunkhwa Peshawar



No. 948-55 /EF

Date: 26/01/2022

ORDER


This order will dispose of the departmental proceedings against Constable Ibrar Ahmed No. 2266/UT, of District Police Mardan now on deputation to Elite Force Khyber Pakhtunkhwa.

As per letter of Principal/SSP Admin EPTC Nowshera vide No. 547/EPTC/NSR/Course, dated 13.10.2021, he remained absent from the undergoing Basic Elite Course-18 without any leave or prior permission from the Competent authority w.e. from 29.09.2021 till to date.

In this regard Charge Sheet alongwith Summary of Allegations were issued to him vide No. 12301-12306/EF, dated 21.10.2021 and Mr. Noor Jamal Khan Acting SP Security EPTC Nowshera was appointed as enquiry officer. The Enquiry Officer conducted the enquiry proceedings but the said constable did not appeared before the enquiry officer nor submitted any reply. Moreover, the delinquent official has been dropped from the BEC-18 and still absent. His service record was also perused which was found porous. Therefore, the Enquiry Office has recommended that he may be awarded major punishment. Similarly, a Final Show Cause Notice was issued to him vide No. 15423/EF, dated 30.12.2021 which was delivered to him through Ex Serviceman HC Rahim Zad No. 7051 of EPTC Nowshera vide DD No. 20, dated 09.01.2022 and received by himself on 10.01.2022, but his reply is still awaited. He neither joined the enquiry proceeding conducted against him, nor appeared for duty. It seems that he has no interest in his current job.

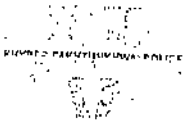
Therefore, I, Asif Iqbal Mohmand, Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, keeping in view the above facts, circumstances and recommendations of enquiry officer, impose major penalty of "DISMISSAL" from service upon him from the date of absence i.e 29.09.2021 under Police Rules 1975 (amended 2014).

(Order announced)


(ASIF IQBAL MOHMAND) PSP
Deputy Commandant
Elite Force Khyber Pakhtunkhwa
Peshawar.

Copy of the above is forwarded to the:-

1. District Police Officer, Mardan for information.
2. Acting Superintendent of Police, Security EPTC Nowshera.
3. Accountant/ Incharge Kot, Elite Force Khyber Pakhtunkhwa Peshawar.
4. Reader to Dy: Comndr OASI; Elite Force Khyber Pakhtunkhwa Peshawar.
5. SRC, Elite Force Khyber Pakhtunkhwa Peshawar.
6. FMC, Elite Force Khyber Pakhtunkhwa alongwith complete departmental enquiry file Enls: (23) pages. (Dairy No. 6835/EF, dated 23.12.2021).



Office of the Addl: IGP,
Elite Force Khyber Pakhtunkhwa Peshawar

TC/2
[Signature]
[Seal]

No. / / JEF

Dated: 12/1/2022

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ORDER

This is a departmental appeal submitted by Ex-Constable Ibrar Ahmad No 2266 against the punishment of dismissal from service awarded to him by the Deputy Commandant Elite Force vide order No.948-55/JEF, dated 26.01.2022, as he has remained absent from Basic Elite Course-18 without prior permission from the competent authority w.e.from 29.09.2021 till the issuance of his dismissal order.

Hence, the competent authority has filed the appeal, on the grounds of time limitation i.e. time barred by 03 months.

Order Announced!

-Sd-

(MIHJANIMAD WISAL FAKHAR SULTAN)PSP
Addl. Inspector General of Police,
Elite Force Khyber Pakhtunkhwa Peshawar

No. 1134 / JEF

Copy of above is forwarded:-

1. Superintendent of Police, HQs: Elite Force, Peshawar.
2. OAST/SRC/FMC, Elite Force, Khyber Pakhtunkhwa, Peshawar.
3. Ex-Constable Ibrar Ahmad No.2266, through Reader SP/HQs: Elite Force.

(ASIF TORAL MOHMAND)PSP
Deputy Commandant
Elite Force Khyber Pakhtunkhwa Peshawar

1/1/22

To,

Home Secretary
Khyber Pakhtunkhwa
Peshawar

D
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Revision Petition against the order dated 10-05-2022 that the Petitioner may be reinstated back his service alongwith all back benefits and the result the order dated 10-05-2022 may kindly be suspended and as well as set aside

Respected Sir,

The Petitioner humbly submits as under:-

- 1) That the Petitioner was appointed as Ex-constable and awarded Belt No 2266 in the year 2015. (Copy of the service card is attached herewith).
- 2) That the Petitioner has been serving his department as a police constable by heart and soul and has got at his credit a length of service standing to more than 07 years approximately.
- 3) That in the year 2021, the Petitioner was seriously suffering from kidney decease and was unable to continue his duty for that reason, the Petitioner remained absenty from his duty; however, the Petitioner moved so many applications to his high-ups for long leave; but that was not entertained.
- 4) That the concerned department without observing any legal formality and without giving any opportunity to the Petitioner, passed the impugned order dated 10-05-2022, whereby the Petitioner was awarded major penalty of dismissal from service.

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- 5) That feeling aggrieved from the above said order, the Petitioner moved departmental appeal before the concerned department, who turned down the appeal of Petitioner vide order dated 10-05-2022 and maintained the order dated 26-01-2022.
- 6) That feeling aggrieved from the said orders and having no other efficacious remedy, now approaches this worthy office.

PRAYER:-

It is, therefore, most humbly prayed that on acceptance of this Revision Petition, the impugned office orders may kindly be set aside. Furthermore, the Petitioner may very graciously be reinstated into service as (Constable) with all back benefits till the final disposal of the instant revision petition.

Any other relief not specifically asked for may kindly be extended in favour of the Petitioner, in the circumstances of the case.

Petitioner (in person)



(IBRAR AHMAD)
S/O Shahid Israr,
R/O Matta Wadigaram
Katlang District Mardan
(Ex-constable No 2266)
Cell # 0344-0992093



ڈسٹرکٹ بار ایسوسی ایشن سردان

بعد التبع
Khyber Pakhtunkhwa Service Tribunal
Peshawar

مورخہ: 20ء منجانب: Appellant

مقدمہ بعنوان: نام
مقدمہ نمبر: رجوعہ
نوعیت مقدمہ: مورخہ
مقدمہ علت نمبر: تھانہ
جرم:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہات دی وکل کاروائی متعلقہ

آن مقام سے [در] کیلئے اصرار سے درخواستیں کی گئی ہیں اور درخواستیں منظور کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل مقررہ کو راضی نامہ کرنے و تقرر ی ثالث و فیصلہ بر حلف دینے عرضی دعویٰ، جواب دعویٰ، اقبال دعویٰ، جواب الجواب، عذر داری، درخواست زبردفعہ (2) 12 ض د، درخواست برآمدگی و سرسبزگی مقدمہ، درخواست برآمدگی و سرسبزگی کاروائی و ڈگری ٹیکسٹ ڈاٹار کرنے جواب، جواب الجواب وغیرہ درخواست کاروائی اجراء دائر کرنے و وصولی چیک و رقم اور درخواست از ہر قسم کی تصدیق و ترمیم پر دستخط وغیرہ کرنے کا اختیار ہوگا۔ اپیل، اپیل دراپیل، مگرانی، نظر ثانی، رٹ و عذر داری وغیرہ دائر کرنے کا بھی اختیار ہوگا۔ اور بصورت ضرورت مذکورہ کے عمل کیا جردی کاروائی کے واسطے وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برداشت منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی پر وکیل موصوف مقام دورہ ہو یا اجازت سے باہر ہو یا یا یا یا کوئی ضروری کام ہو۔ تو وکیل صاحب پابند نہ ہونگے کہ بیرونی مقدمہ مذکورہ کریں لہذا وکالت نامہ لکھ دیا تاکہ مستند ہے۔

المرقوم: 20-1-2023

مقام: سردان

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Bar Council No

09-1785

Bar Association

Contact #:

03 005 818228

Emboss

Attested
&
Accepted

A

ایبار احمد ولد شاہد اسرار سکند: عملہ اور ایسوسی ایشن سردان