

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.

Service Appeal No. 704/2019
Date of Institution ... 28.05.2019
Date of Decision ... 20.10.2021

Saira No. 1623, Ex-Lady Constable Mardan District Police Mardan.

... (Appellant)

VERSUS

Inspector General of Police Khyber Pakhtunkhwa Peshawar and
one other.

... (Respondents)

Mr. JAVED IQBAL GULBELA,
Advocate

--- For appellant.

MR. MUHAMMAD RASHEED,
Deputy District Attorney

--- For respondents.

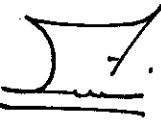
MR. SALAH-UD-DIN
MR. ATIQ-UR-REHMAN WAZIR

--- MEMBER (JUDICIAL)
--- MEMBER (EXECUTIVE)

JUDGMENT:

SALAH-UD-DIN, MEMBER:-

Precise facts giving rise to filing of instant service appeal are that the appellant while posted as Constable in Police Lines Mardan, remained absent from duty with effect from 13.12.2011 till 30.04.2012 without any leave/permission of the competent Authority, therefore, she was proceeded against departmentally and was dismissed from service vide order bearing O.B No. 1336 dated 30.04.2012. The same was challenged by the appellant through filing of departmental appeal on 20.04.2019, however the same was filed by the appellante Authority being time barred.



The appellant has now approached this Tribunal through filing of the instant service appeal for redressal of her grievance.

2. Notices were issued to the respondents, who submitted their reply/comments, wherein they refuted the stance of the appellant.

3. Learned counsel for the appellant has contended that absence of the appellant from duty was not willful, rather she was ill and was thus unable to attend her duty; that neither any show-cause notice nor any statement of allegations as well as charge sheet were issued to the appellant and thus the mandatory provisions of Khyber Pakhtunkhwa Police Rules, 1975 were not complied in the so called inquiry conducted against the appellant; that whole of the proceedings were taken at the back of the appellant without providing her any opportunity of self defense or personal hearing; that the appellant was seriously ill and during the period of her absence from duty, she gave birth to three children and all of them were born through major surgeries, therefore, the delay in filing of departmental appeal is condonable. Reliance was placed on 2007 SCMR 73, 1995 SCMR 950, 1997 SCMR 287 and 2020 PLC (C.S) 34.

4. On the other hand, learned Deputy District Attorney for the respondents has contended that the appellant remained absent from duty without seeking any leave or permission of the competent Authority and has thus committed gross misconduct; that the appellant was issued show-cause notice by the competent Authority, however she deliberately avoided to attend her duty; that the appellant was dismissed from service vide order bearing O.B No. 1336 dated 30.04.2012, however she willfully remained absent from duty and preferred departmental appeal after considerable delay on 20.04.2019, which was badly time barred, therefore, the instant service appeal is also not maintainable and is liable to be

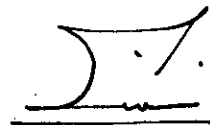
dismissed; that the appellant had not taken the plea of her illness in the departmental appeal and has herself admitted that she remained absent from duty due to domestic reasons, therefore, the delay in filing of departmental appeal could not be condoned. Reliance was placed on 2006 SCMR 453, 2005 SCMR 1206, 2010 SCMR 1982 and 2013 SCMR 911.

5. Arguments heard and record perused.

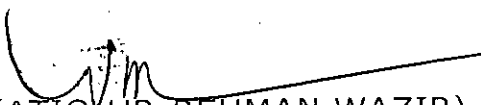
6. A perusal of the record would show that the appellant was dismissed from service vide order bearing O.B No. 1336 dated 30.04.2012, which was challenged by the appellant through filing of departmental appeal after considerable delay on 20.04.2019. The departmental appeal of the appellant was filed by the appellate Authority on the ground that the same was badly time barred. The appellant has though submitted an application for condonation of delay before this Tribunal, however no sufficient reason has been put forth by the appellant, which could be considered as a ground for condonation of the delay. It is settled proposition of law that when an appeal of the employee was time barred before the appellate Authority, then the appeal before the Tribunal was also not competent. Reliance is placed on PLD 1990 S.C 951, 2006 SCMR 453 and 2007 SCMR 513. Moreover, august Supreme Court of Pakistan in its judgment reported as 1987 SCMR 92 has held that when an appeal is required to be dismissed on limitation, its merits need not to be discussed.

7. In view of the foregoing discussion, it is held that as the departmental appeal of the appellant was badly time barred, therefore, the appeal in hand being not competent is hereby, dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
20.10.2021



(SALAH-UD-DIN)
MEMBER (JUDICIAL)



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

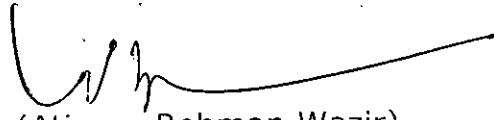
Service Appeal No. 704/2019

ORDER
20.10.2021

Appellant alongwith her counsel Mr. Javed Iqbal Gulbela, Advocate, present. Mr. Kheyal Roz, Inspector (Legal) alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, it is held that as the departmental appeal of the appellant was badly time barred, therefore, the appeal in hand being not competent is hereby, dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
20.10.2021


(Atiq-ur-Rehman Wazir)
Member (Judicial)

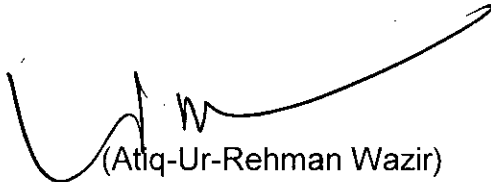

(Salah-ud-Din)
Member (Judicial)

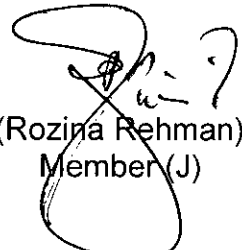
13.10.2021

Appellant alongwith his counsel present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Mr. Khyal Roz Inspector for the respondents present.

Partial arguments were heard by a bench comprising Hon'ble Member Judicial (Mr. Salah-Ud-Din) and Hon'ble Member Executive (Mr. Atiq-Ur-Rehman Wazir) therefore, a request was made for adjournment with a request to fix the case before the concerned bench for further arguments. Request is acceded to and case is adjourned to 20.10.2021 for arguments before the concerned D.B.

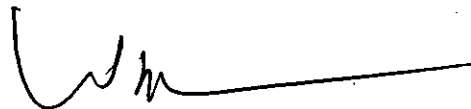

(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

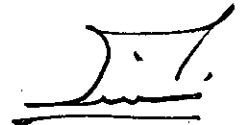
26.07.2021

Appellant alongwith Mr. Javed Iqbal Gulbela, Advocate, present. Mr. Khayal Roz, Inspector (Legal) alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Partial arguments heard. To come up for remaining arguments before the D.B on 09.09.2021.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



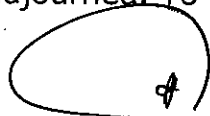
(SALAH-UD-DIN)
MEMBER (JUDICIAL)

09.09.2021

Appellant in person present.

Kabir Ullah Khattak learned Additional A.G for respondents present.

Lawyers are on general strike. Therefore, case is adjourned. To come up on 13.10.2021 before D.B.



(Rozina Rehman)
Member (J)

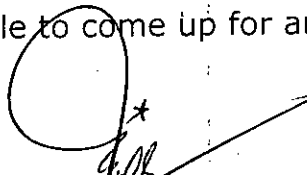


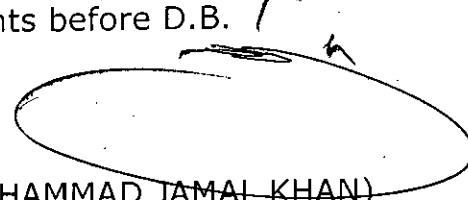
Chairman

10.12.2020

Appellant is present in person. Mr. Muhammad Jan, Deputy District Attorney and Mr. Khalid Mehmood, Head Constable for the respondents are also present.

According to the appellant her counsel is pre-occupied in the august Supreme Court of Pakistan and could not spare time to attend the Tribunal today and requested for adjournment. Request is acceded to, the appeal is adjourned to 10.02.2021 on which date file to come up for arguments before D.B.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

10.02.2021

Appellant is present alongwith Mr. Muzamil Khan Mohmand, Advocate. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Khayal Roz, Inspector (Legal), for the respondents are also present.

According to the learned counsel his senior is busy in looking after his ailing mother, therefore, he requested for adjournment. Adjourned to 09.04.2021 on which date file to come up for arguments before D.B.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

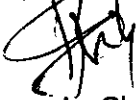
9.4.21


Due to COVID-19, the case is adjourned to 26.7.2021 for the same.



19.02.2020

Appellant in person present. Mr. Kabirullah Khattak learned Additional AG for the respondents present. Appellant submitted rejoinder which is placed on file and seeks adjournment. Adjourned. To come up for arguments on 07.04.2020 before D.B.


(Hussain Shah)


(M. Amin Khan Kundi)

7.4.2020

Due to COVID 19, the case is adjourned to 2.7.2020 for same as before.



02.07.2020

Due to Covid-19, the case is adjourned. To come up for the same on 27.08.2020 before D.B.


Reader

27.08.2020

Due to summer vacation, the case is adjourned to 04.11.2020 for the same as before.


Reader

04.11.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 10.12.2020 for hearing before the D.B.


(Mian Muhammad)
Member


Chairman

704/19

02.09.2019

Counsel for the appellant and Addl. AG alongwith Attaur Rahman, Inspector (Legal) for the respondents present.

Representative of the respondents requests for time to furnish written reply/comments. To come up for requisite reply/comments on 27.09.2019 before S.B.

Chairman



27.09.2019

Appellant in person. Addl. AG alongwith Attaur Rahman, Inspector (Legal) for the respondents present.

Representative of the respondents has submitted reply on behalf of respondents which is placed on record. The appeal is assigned to D.B for arguments on 13.12.2019. The appellant may submit rejoinder, within a fortnight, if so advised.

Chairman



13.12.2019

Lawyers are on strike as per the decision of All Pakistan Joint Lawyers Action Committee. Adjourn. To come up for further proceedings/arguments on 19.02.2020 before D.B



Member



Member

01.07.2019

Counsel for the appellant Saira Present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was imposed major penalty of dismissal from service vide order dated 30.04.2012. The appellant filed departmental appeal on 20.04.2019 which was rejected on 15.05.2019 hence, the present service appeal on 28.05.2019. It was further contended that the appellant being lady constable was ill. It was further contended that the appellant was imposed major penalty of dismissal from service on the basis of absence of less than four months period. It was further contended that the penalty is very harsh. It was further contended that the appellant has seven years service in her credit. It was further contended that neither proper inquiry was conducted nor an opportunity of personal hearing and defence was provided to the appellant therefore, the impugned order is illegal and liable to be set-aside. It was further contended that though there is some delay in departmental appeal but the appellant has also filed application for condonation of delay.

The contention raised by learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to limitation and all legal objections. The appellant is directed to deposit security and process fee within 10 days thereafter, notices be issued to the respondents for written reply/comments for 02.09.2019 before S.B.

Appellant Deposited
Security & Process Fee




(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 704/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/05/2019	<p>The appeal of Mst. Saira presented today by Mr. Javed Iqbal Gulbela Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 28/5/19</p>
2-	29/05/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>01/07/2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A. 704 /2019

Saira Ex-Constable

VERSUS

Inspector General of Police Khyber Pakhtunkhwa and
others

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6.	Copy of dismissal order No.2545-48/PA dated 02/05/2012 bearing OB-1336, dated 30/04/2012	"B"	43
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Appellant

Through


Saghir iqbal Gulbela

&


Javed Iqbal Gulbela

Advocates, High Court
Peshawar

Dated: 27/05/2019

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A 704 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 814

Dated 28/5/2019

Saira No.1623, Ex-lady Constable Mardan
District Police Mardan.

------(Appellant)

VERSUS

1. Inspector General of Police Khyber
Pakhtunkhwa Peshawar.
2. District Police Officer Mardan.

------(Respondents).

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT -1974 AGAINST THE IMPUGNED
DISMISSAL ORDER NO.2545-48/PA
DATED 02/05/2012 BEARING OB-1336,
DATED 30/04/2012 WHEREBY THE
APPELLANT WAS DISMISSED FROM
SERVICE AND ORDER NO.1758/19
DATED 15/05/2019, WHEREBY
DEPARTMENTAL APPEALS WERE
DISMISSED IN A CLASSICALLY
CURSORY AND WHIMSICAL MANNER.**

Filed to-day
Registrar
28/5/19

Respectfully Sheweth:

1. That the appellant was inducted into service
of the Police Department, after going through

the mandatorily required test and interviews, years back.

2. That since recruitment in this prestigious Force, the appellant left no stone unturned in performance of his duties and he ever proved her mental, wetted skill and potential for rendering meritorious services and this is the reason that the appellant has always won the appreciation of his high ups.
3. That this was the back drop when the appellant herself fall seriously ill and have gone from several serious surgeries due to which she was repeatedly hospitalized and remained at hospital for most of times. During this long period she gave birth to three children and all of them born through major surgeries. **(Copies of the medical documents are annexed as annexure "A")**.
4. That the appellant during her illness did not attend her duty and because of that the Respondent dismissed the appellant from service in classical and whimsical manner vide order No.2545-48/PA dated 02/05/2012 bearing OB-1336, dated 30/04/2012. **(Copy of dismissal order No.2545-48/PA dated**

02/05/2012 *bearing* OB-1336, dated 30/04/2012 is annexure "B")

5. That the Respondent did not issue any statement of allegation, charge sheet, show cause notice or any final show cause notice and passed the impugned dismissal order from service, which act of the Respondent is not only illegal, void abinitio but is also against the law.
6. That after the dismissal order from service the appellant preferred departmental appeal but, that was also turn down in a classical, whimsical and cursory manner vide impugned office order No.1758/19 dated 15/05/2019, which is not only illegal, vide-ab-initio, unlawful but is also quorum-non-judice and is also against the rights of the appellant. (Copy of departmental appeal and its dismissal order No.1758/19 dated 15/05/2019 are annexed as annexure "C, & D")
7. That feeling aggrieved from the orders the appellant preferred the instant appeal for her reinstatement on the following grounds inter alia:-

Grounds:

- A. That the dismissal order is wrong, illegal, void, ab-initio and is not sustainable at all.
- B. That the impugned dismissal order is unwarranted, illogical and against the Rules, so therefore not maintainable at all.
- C. That no proper inquiry was ever conducted in case of the appellant, nor the appellant was ever heard in person, nor was ever allowed to cross examine any witness and thus the appellant was condemned unheard.
- D. That the appellant herself was ill and thus could not report to the department and on the other hand the department took the same as deliberate absence from duty and was proceeded against departmentally.
- E. That it is pertinent to mention here that no Show cause notice or final Show cause notice, statement of allegation or any charge sheet was issued to the appellant, and the Respondent straight away dismiss the appellant from service without giving any opportunity of personal hearing to the appellant, therefore the impugned dismissal

order is totally illegal, wrong, void-ab-initio, unlawful, quorum non-judice and not sustainable in the eye of law.

F. That neither the appellant was heard in person neither she was given any opportunity to produce her defense and in this way she was condemned unheard

G. That even the appeal of the appellant was dismissed without any rem or reason, nor the appellant was ever summoned by the appellant authority as per Appeal Rules 1986 and thus the appellant was double jeopardized.

H. That the appellant belongs to a poor family, and is the only earning hand in the whole family to look after them.

I. That the appellant has many years service and that too unblemished, without any complaint ever against, on part of the appellant.

J. That from every angle the appellant is liable to be re-instated into service, with all back benefits.

K. That any other ground not raised here may graciously be allowed at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned office order No.2545-48/PA Dated 02/05/2012 bearing OB-1336, dated 30/04/2012 of the office of Respondent No. 02 whereby the appellant has been dismissed from Service and office order NO. 1758/19, dated 15/05/2019 of Respondent NO.1 whereby departmental appeal's of the appellant were dismissed may graciously be set-aside and by doing so the appellant may very graciously be re-instated into Service with all back benefits.

Any other relief not specifically asked for may also graciously be extended in favour of the appellant in the circumstances of the case.

Sain
Appellant

Through

Sain
Saghir iqbal Gulbela

&

Sain
Javed Iqbal Gulbela

Advocates, High Court

Peshawar.

Dated: 27/05/2019

NOTE:-

As per information of my client no such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

Sain
Advocate.

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2019

Saira Ex-Constable

VERSUS

Inspector General of Police Khyber Pakhtunkhwa and
others

AFFIDAVIT

I, **Saira No.1623, Ex-lady Constable Mardan District Police**, do hereby solemnly affirm and declare that all the contents of the accompanied **appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

Saira
DEPONENT

Identified By:

Saghir
Saghir Iqbal Gulbela
Advocate High Court
Peshawar.



BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A _____/2019

Saira Ex-Constable

VERSUS

Inspector General of Police Khyber Pakhtunkhwa and
others

ADDRESSES OF PARTIES

APPELLANT.

Saira No.1623, Ex-lady Constable Mardan District
Police.

ADDRESSES OF RESPONDENTS

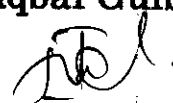
1. Inspector General of Police Khyber
Pakhtunkhwa Peshawar.
2. District Police Officer Mardan.


Appellant

Through


Saghir iqbal Gulbela

&


Javed Iqbal Gulbela
Advocates, High Court
Peshawar.

Dated: 27/05/2019

9

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re. C.M No. _____/2016

In S.A No. _____/2019

Saira Ex-Constable

VERSUS

Inspector General of Police Khyber Pakhtunkhwa and
others

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth,

1. That the petitioner is filing the accompanying appeal the contents of which may graciously be considered as integral part of the instant petition.
2. That the appellant herself fall seriously ill and have gone from several serious surgeries due to which she was repeatedly hospitalized and remained at hospital for most of times. During this long period she gave birth to three children and all of them born through major surgeries., so delay was caused in moving departmental appeal, which delay was natural and obviously beyond control of the appellant.
3. That law also favour adjudication on merits and technicalities of any sort

(10)

must always be ignored while reaching a just and fair disposal of the case.

4. That for proper disposal of the accompanying case on its merits, the condonation of delay is indispensable.
5. That not only the petitioner has got a prima facie case and having balance of convenience in her favour, but would suffer irreparable loss, if the instant petition is not allowed.

It is, therefore, most humbly prayed that on acceptance of the instant petition, the delay in filing the departmental appeals, may graciously be condoned and the accompanying appeal may very graciously be decided on its merits.


Appellant

Through



Saghir iqbal Gulbela

&



Javed Iqbal Gulbela

Advocates, High Court
Peshawar

Dated: 27/05/2019

11

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A _____/2019

Saira Ex-Constable

VERSUS

Inspector General of Police Khyber Pakhtunkhwa and
others

AFFIDAVIT

I, **Saira No.1623, Ex-lady Constable Mardan District Police**, do hereby solemnly affirm and declare that all the contents of the accompanied **application** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.


DEPONENT

Identified By:



Saghir Iqbal Gulbela
Advocate High Court
Peshawar.



79

Lady Dr. Taleema Ali

M.B.B.S
MCPS (T) Gyn/Obs

Ph:091-6512647

Annexure "A"

Dr. Ali Shah

M.B.B.S
RMP, MUSP



45-47

Name: Saba Hameed Age 11 Date 16.5.17

Clinical Record

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Calwis D. Cap

NAGRA

JAVED IQBAL, Gul Bela
Daudzai Law Chamber
Associate High Court Peshawar
MOB: 345-9405501

DEPARTMENT OF OBSTETRICS AND GYNECOLOGY
Postgraduate Medical Institute, Lady Reading, Peshawar Pakistan.

Professor **Dr. Rehana Rahim**

Gynae "C" Unit
M.B.B.S, F.C.P.S (Pakistan)
F.R.C.O.G (London)
MRCP (Ireland)
Tel: No. 0334-9122582

پروفیسر ڈاکٹر ریحانہ رحیم

گائنی یونٹ لیدی ریڈنگ ہسپتال
ایف۔ آر۔ سی۔ او۔ جی۔ ایف۔ سی۔ پی۔ ایس (پاکستان)
ایم۔ آر۔ سی۔ پی (آئرلینڈ)
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فیز 2 بالقاتل اتوار بازار حیات آباد پشاور

(ہفتہ، اتوار کو تعطیل ہوگی)

ہمارا کلینک کسی بھی وقت یہاں سے منتقل ہو سکتا ہے،
اسلئے آنے سے پہلے مندرجہ ذیل نمبر پر رابطہ کریں۔
موبائل: 0334-9122582

Date: 5/6/15

Ref. No: _____

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- 100mg
- 33ms

JAVED IQR, L. Gul Bela
Dauda, Law Chamber
Advr. No. 11 High Court Peshawar
Mob. 0345-9405501

گھر کیلئے ہدایات

- 1- دن میں 3 مرتبہ پاپوڈین سے ٹانگے صاف کریں۔
- 2- گھر جا کر نہائیں۔
- 3- کھانے میں کسی چیز سے پرہیز نہیں۔
- 4- چلنے پھرنے اور سیڑھیاں چڑھنے کی کوئی ممانعت نہیں۔
- 5- 6 ہفتے بعد گائنی اور پی ڈی بروز منگل، جمعہ کو دکھائیں۔

FOLLOW UP ADVICE

5 جولائی کو سٹینڈ کھلوانے آئیں
بلڈ ریسٹریکٹڈ رکھیں اینڈ لیفٹ
گھر جا کر نہائیں

Signature

Caps. Cefitol- 400mg
(Cefixime)

Naplu
(Flurbiprofen)

Tab. Glubiron-F
(Iron Polymaltose+Folic Acid)

GYNAE "B" UNIT DISCHARGE REPORT

Department of Obstetrics and Gynaecology
POST GRADUATE MEDICAL INSTITUTE
LADY READING HOSPITAL PESHAWAR.

Professor: **Dr. Rehana Rahim**
M.B.B.S, F.R.C.O.G, M.R.C.P
Associate Professor **Dr. Simi Fayaz**
M.B.B.S, F.C.P.S, M.R.C.O.G
Assistant: Professor: **Dr. Tanveer Shafqat**
M.B.B.S, F.C.P.S,
Senior Registrar: **Dr. Shagufta Shaheen**
M.B.B.S, M.C.P.S, F.C.P.S
Junior Registrar **Dr. Kh. Fawad Parvez**
M.B.B.S, F.C.P.S
Dr. Farhadia
M.B.B.S, F.C.P.S
Dr. S.Saima Hussain
M.B.B.S,

Blood Group AB+ve

Hbs Ag: -ve

Anti HCV Ab: -ve

Name: Saira W/o Hameed

Age: 28 yrs

Admission Date 7/6/13 Admission No 4060

Operation Date 29/6/13 Discharge Date 1/7/13

Diagnosis G6 P⁺ 37 w/o PGR e P1H e B0H

Treatment Elective LSCS

Caps. Cefitol- 400mg
(Cefixime)

Naplu
(Flurbiprofen)

Tab. Glubiron-F
(Iron Polymaltose+Folic Acid)

Treatment at Home

گھر کیلئے علاج

Tig Cetakox 1Gm B-D

Cap velosef 500mg 1+1+1

Cap Phlogem 500mg 1+1

Tab melhergen 1+1+1

Tab BUSCOPAN plus 1+1+1

Tab flaxyl 1+1+1

Tab Trihemie تری ہیمیک

SYP Bioglobin ۸+۸

JAVED KHALID, Gil Balh
Daudpota, Mardan
Advocate, High Court, Peshawar
Mob. 0345-940550

دوبارہ معائنہ کیلئے (8) دن بعد تشریف لائیں

دن رات سروس

Al-Noor Press Mardan. Cell:0937-861450

M. JEHANGIR HOSPITAL



CHATO CHOWK, MARDAN

Tel: 0937-862788 Fax: 0937-875589

Mobile: 0345-5852883

DISCHARGE SLIP

Name Sairan Shikah Sheensan

\$/P/W/O Hameed

Age _____ Sex F Ad. No. (2) B. No. (3)

Address Chorsadha

DOA 11/9/15 DOP 11/9/15 DOD 13/9/15

Surgeon Dr Zakia Khalid

Anaesthesia G.A

Diagnoses F T P

Operation ELCS

(5)

Lady Dr.

Zakia Khalid

M.B.B.S

Gynaecologist

Ultrasonologist

Clinic: 0937 - 873512
0937 - 862788



M. Jehangir Hospital

ایم جہانگیر ہسپتال

چانچوک مردان

(16)

لیڈی ڈاکٹر ذکیہ خالد

ایم بی بی ایس

الٹراساؤنڈ سپیشلسٹ

ماہر امراض زنانہ

Name

سارہ

Date

9-10-2024

Address

Age

Sex

PELVIC U/S

Uterus: Normal in size and shpe with collapsed cavity.

Both Ovaries: Normal in size and volume no cyst mass seen.

Both adnexa: NAD

Cul-de-sac: Clear

▷ Normal Pelvic scan.

HEAMOCARE

PREGNOVIT

BONETA MAMA

VC CAI

اوقات کار صبح تا نماز ظہر

Investigation

Dr. Zakia

تعطیل بروز اتوار

JAVEED JOBAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501



ایم جہانگیر ہسپتال چاٹوچوک مردان

فون: 0937-862788
0937-873512



ہواشانی

لیڈی ڈاکٹر ذکیہ خالد

Lady Dr. Zakia Khalid
M.B.B.S

Gynaecologist
Member of Pakistan Society of
Family Physician Lahore

اوقات کار
صبح تا نماز ظہر

ایم بی بی ایس
گائنا کالوجسٹ اینڈ الزاساؤنڈ سپیشلسٹ
ممبر آف پاکستان سوسائٹی فیملی فزیشن

Name: *[Handwritten Name]* Age: *[Handwritten Age]* Sex: *[Handwritten Sex]* Date: 9/10/17

Clinical Record

Rx

- *[Handwritten notes]*
- *[Handwritten notes]*

- *[Handwritten notes]*

Menst. Hx:

LMP:

E.D.D

OBS.HX.

G+P+ 2 CS
2 ♀ LBS

O/E one month

B.P 110/70

Chest *[Handwritten]*

PIA

P/V

Investigation

[Handwritten]

[Large handwritten notes in Urdu, including 'بہتر' and 'نہایت']

تعمیل پروڈاکٹس

JAVED IQBAL, Gul Bela
Advocate Law Chamber
Advocate High Court Peshawar
Mob: 9345-9405591



Pt's Name:

072

(Ph: 0937-862788)

Age

Sex

Date

09-10-75

URINE/R/EXAMINATION

PHYSICAL EXAMINATION

Colour

Appearance

Sp. Gravity

pyaluo
ONS

CHEMICAL EXAMINATION

Reaction

Albumin

Sugar

Acidic
NIL
NIL

MICROSCOPIC EXAMINATION

Pus Cell

R:B.C

Epith: Cells

Calcium Oxalate Envelop Shape Crystal

Calcium Oxalate Bell Shape Crystal

Tripple Posphate Crystal

Amorphouse Phoshate

Amorphouse Urate

Casts

Uric Acid Crystal

Pregnancy

OB - 08
1 - 02
(2)

/HPF

/HPF

/HPF

/HPF

/HPF

/HPF

/HPF

Lab comments

Lab Incharge

JAVED IQBAL
Judicial Law Chamber
Advocate High Court Peshawar
Mob: 0345-9495501

Dr. Shahida Sultan

MBBS, FCPS

M.R.C.OG(1)

Gynecologist / Obstetrician

Senior Registrar Gyne "C" Ward

Lady Reading Hospital Peshawar



ڈاکٹر شہیدہ سلطان

ایم، بی، ایف، سی، پی، ایس

ایم، آر، سی، او، جی (1)

ماہر امراض نسوان از چیمبر

سینئر رجسٹرار گائنی "سی" وارڈ

لیڈی ریڈنگ ہسپتال

Not Valid For Medical Legal Purpose

Pt's Name Saira Hameed Age _____ Date 2.12.16

Clinical Record

Rx

P + 5
P2 18
19 late
♀

LBPs = 1 1/2 yrs

LMP: - 1 1/2 yrs

wt: - 98kg

B.P: 130/90

P/A

flusky abd / Scar

P/U

u/u ✓

ut ✓

w ✓

shwa Copius

discharge

چھٹی بروز ہفتہ اتوار

Body aches
flank pain
pain hypogast
discharge
pruritus 2 yrs

Rx

Tab Mian 400g
3 دن - 1cl

Tab Mobicel
3 دن - 1cl

Tab Relispa 750g
3 دن - 1cl

0332-7000262

0346-9073330

رابطہ نمبر:

کلینک: A-13 خوشحال میڈیکل سنٹر بیک سائیڈ خٹک میڈیکل سنٹر ڈگری گارڈن پشاور

JAVED ITOBI, Gul Bela
Dadda Law Chamber
Advocate High Court Peshawar
Mob: 3345-9405504



Ali Daignostic Centre

Ali Daignostic Centre

Computerised Lab, Chemical Pathology,
Haematology, Microbiology, Ultrasound

Name	Saira Bibi	Date	2-Dec-16
Refer By	Dr. Shaida Sultan		

ABDOMINAL AND PELVIC ULTRASOUND

Liver

Liver is of normal size with **increased** echogenicity and smooth parenchymal echo pattern. No mass lesion seen. No intra hepatic biliary dilatation. CBD and portal vein are of Normal caliber.

Gallbladder

GB is normal in size having normal wall thickness. No mass or calculus seen.

Spleen

Spleen is **moderately enlarged in size measuring (14.1cm)** with normal parenchymal echo texture. No focal lesion seen.

Pancreas

Pancreas is of normal size with normal parenchymal echo texture. No focal lesion seen.

Kidneys

Both kidneys are of normal size echogenicity & normal cortical thickness with well-differentiated cortico-medullary junction.

No ascites or para aortic lymphadenopathy noted.
Normal major vessels and no definite gut pathology noted.

Pelvic Scan

Uterus is of normal size with collapsed cavity and normal endometrial thickness.

No adnexal pathology.

No free fluid in cul-de-sac

Urinary bladder is adequately filled and shows normal wall thickness. No mass or calculus is noted

IMPRESSION

- Fatty liver
- Moderate splenomegaly with no focal lesion.
- Normal pelvic scan.

Thank you for referral

Dr. Aziz Ullah Jan
Certified Sonologist

Dear doctor,
If ultrasound report does not provide with digital findings, you can always ask for a free second opinion.
091-2220400

Note: Abdominal scan performed

JAVEN IQBAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-3405501



- Computerized Lab
- Chemical Pathology
- Hematology
- Microbiology

Patient Name	Saira bibi	Patient Id:	480
Sex	Female	Sampling Date	02-Dec-2016 6:39 pm
Age	???	Result Date	02-Dec-2016 6:41 pm
Referred By	DR SHAHIDA SULTAN	Specimen	Urine

Urine R/E

Physical Examination

Quantity 20 ml 20 ml
 Colour Pale Yellow

Chemical Examination

PH Acidic
 Albumin Nil
 Sugar Nil

Microscopic Examination

Pus Cells	02.....03	/HPF	04-----05
Epith Cells	(+)	/HPF	
Calcium Oxalate	Nil	/HPF	
Amorphus Phosphates	Nil	/HPF	

Handwritten signature

A-16, 1st Floor Khushal Medical Center Dabgari Garden Peshawar

JAVED IQBAL
 Original Law Chamber
 Advocate High Court Peshawar
 Mob: 0345-9405501

LifeCare

Diagnostic Center



- Computerized Lab
- Chemical Pathology
- Hematology
- Microbiology

Patient Name	Saira bibi	Patient Id:	480
Sex	Female	Sampling Date	02-Dec-2016 6:39 pm
Age	???	Result Date	02-Dec-2016 6:41 pm
Referred By	DR SHAHIDA SULTAN	Specimen	Blood

Blood Sugar (R)

Blood Sugar (R)	109	mg/dl	70-----150
Blood Sugar (R)			

A-16, 1st Floor Khushal Medical Center Dabgari Garden Peshawar

JAVED IQBAL Gul Bela
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob: 0345-9405501

Lady Dr. Bushra Basit

M.B.BS (Punjab)

M.U.S.P (Pak)

M.A.I.U.M (USA)

Diploma Ultrasound (Pesh)

Cell: 0331-9914576



لیڈی ڈاکٹر بشری باسط

ایم بی بی ایس (پنجاب) ایم یو ایس پی (پاک)

ایم اے آئی یو ایم (امریکہ)

ماہر امراض زچہ و بچہ والنرساؤنڈ سپیشلسٹ

Name: Ush Hameed W/o _____ Age _____ Sex F Date 22/4/2019

C/o

Qig P 2 + 5

B.P 110/70

Pulse 80/m

Temp 2

Amenorrhoea 4/12
Am check up

long tab
Abdomet
2x BD

Tab. Abdomet 20g

L.M.P _____

جان 2h

P.A _____

P.V _____

Tab. Acyfer - F

سینٹ
Food sup

چھٹی بروز اتوار

کلینک: باسط سلیم ہاؤس، نزدنی بی ہسپتال، بغدادہ مردان

JAVED ICH
Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

Lady Dr. Bushra Basit

M.B.S (Punjab), M.U.S.P. (Pak)
M.A.I.U.M. (U.S.A)

حوالشیانی



لیڈی ڈاکٹر بشریٰ باسط

ایم بی بی ایس (پنجاب)، ایم یو ایس پی (پاک)
ایم اے آئی یو ایم (امریکہ)

الٹراساؤنڈ کلینک

باسط سلیم ہاؤس نزد ٹی بی ہسپتال
بغدادہ مردان

ULTRASOUND CLINIC

Basit Saleem House,
Near T.B. Hospital,
Baghdada Mardan.

ULTRASOUND CLINIC

Name Wp Hameed Date 22/4/2017

L.M.P. _____ Referred by Dr

Reason for Examination Obstetric

SONOGRAPHIC FINDINGS

Size and No. Of Gestational Sac 6 Placental Localization Fun

Number of fetuses 2 Foetal Stomach _____

Presentation Vlrb Foetal Bladder _____

Lie 1 Amount of Liquor Adequate

Foetal Spine _____ CRL 9-4cm

Foetal Heart Beat tn B.P.D _____

Foetal Movement su Femur Length _____

Foetal Gestation 15wk 4day

COMMENTS: tn

JAVED IQBAL, Gul Bela
Daughter Law Chamber
Advocate High Court Peshawar
Mob: 9345-946591

ESOFIL 40mg

PIREXEN 20mg

Lady Dr: Taleema Ali



Dr. Ali Shah

M.B.B.S
MCPS (T) Gyn/Obs

Ph: 091-6512647

M.B.B.S
RMP, MUSP

Name: Sayeda Amir

Age A/F

Date 14.2.17

Clinical Record

Rx

Am: 4 weeks 8

BP 120/90

Temp N

Tab Lupin 75

35 P 120/90

Tab Lyngan

L.B. Blyear

C10

P. H.G

B. ache

Poly. used

P. Pressure

JAVED IQBAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob. 0345-9405501

چھٹی بروز اتوار

کلاڈھیر مردان روڈ نزد پشاور ماڈل سکول چارسدہ

Prolap Caps.

Fleet Tab

Qenz-10 Caps.

ALI MEDICAL CENTRE

EARLY OBS ULTRASOUND

Tel; ;0916512647

Kulader near Peshawar Model School

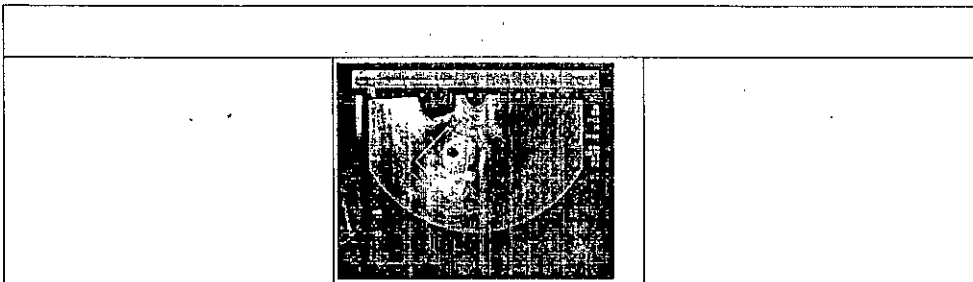
Mardan Road Charsadda

Dr ALI SHAH
M.B.B.S; M.U.S.P.

Dr TALEEMA ALI
M.B.B.S; M.U.S.P.

Date;17-02-2017.Name;SAIRA.W/O;HAMEED.Age;32Years.

Address;CHARSADDA.Ref.By;SELF.Clinical Profile;



TECHNIQUE USED;TVS.

- Enlarged bulky uterus with a gestational sac containing a single embryo in the fundal region eccentrically placed with decidual reaction and with no cardiac and somatic activity.
- CARDIAC ACTIVITY; seen.
- SHAPE of SAC ;is Circular.
- DECIDUAL REACTION;All around.
- AMNIOTIC FLUID;is adequate in quantity by subjective analysis.
- BIOMETRY;Gestational Sac Diameter(GSD);15.6mm.Crown Rump Length(CRL);15.1mm.Heart Rate;135bpm.B.P.D;cm. Yolk Sac;not/ Seen.
- ADNEXAE;Both ovaries and other pelvic structures are normal.
- ESTIMATED GESTATIONAL AGE ;06Weeks+02Days.
- ESTIMATED DATE OF DELIVERY;11/10/2017±15Days.
- COMMENTS;LIVE INTRAUTERINE PREGNANCY.

Prepared By;NOUREEN.

Sonologist;Dr Taleema Ali

JAVED ICHAK
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

ALI MEDICAL CENTRE

EARLY OBS ULTRASOUND

Tel; ;0916512647

Kulader near Peshawar Model School

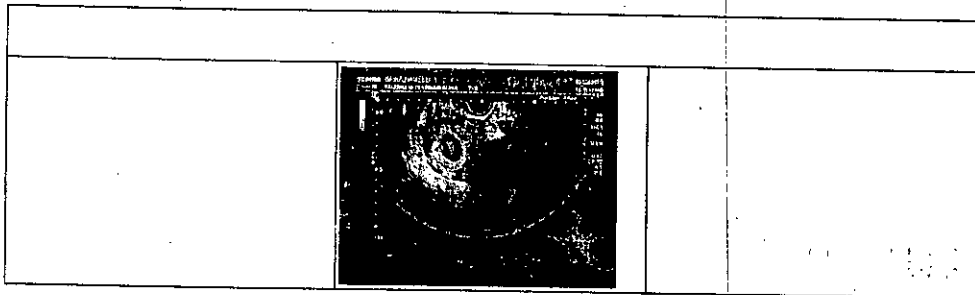
Mardan Road Charsadda

Dr ALI SHAH
M.B.B.S; M.U.S.P.

Dr TALEEMA ALI
M.B.B.S; M.U.S.P.

Date;25-02-2017.Name;SAIRA.W/O;HAMEED.Age;32Years.

Address;CHARSADDA.Ref.By;SELF.Clinical Profile; Wants fetal wellbeing



TECHNIQUE USED;TVS.

- Enlarged bulky uterus with a gestational sac containing a single embryo in the fundal region eccentrically placed with decidual reaction and with cardiac and somatic activity.
 - CARDIAC ACTIVITY; seen.
 - SHAPE of SAC ;is Circular.
 - DECIDUAL REACTION;All around.
 - AMNIOTIC FLUID;is adequate in quantity by subjective analysis.
 - BIOMETRY;Gestational Sac Diameter(GSD);26.5mm.Crown Rump Length(CRL);16.63mm.Heart Rate;135bpm.B.P.D;cm. Yolk Sac;not/ Seen.
 - ADNEXAE;Both ovaries and other pelvic structures are normal.
- ESTIMATED GESTATIONAL AGE ;07Weeks+03Days.
ESTIMATED DATE OF DELIVERY;11/10/2017±15Days.
COMMENTS;LIVE INTRAUTERINE PREGNANCY.

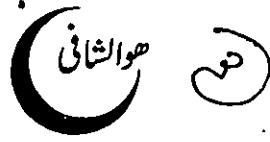
Prepared By;NOUREEN.

Sonologist;Dr Taleema Ali

JAVED ICHAH
Daudabai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

Lady Dr. Taleema Ali

M.B.B.S,
M.C.P.S (T)Gyn/Obs



PH: 091-6512647

Dr. Ali Shah

M.B.B.S,
RMP, MUSP

Patient Name: Saida / Hameed

Age: A/F Date: 25-2-17

Clinical Record

Rx

Am 6 week 3

B.P. $\frac{130}{90}$

Tab Lopinoy
(تبع روزانہ، جادے) (30)

Temp = N.

Tab Adalomed 20mg
(جادے) 2+2+2 (30)

G.S. P (10)
10
N.V.D

Tab Fodind
(تبع روزانہ) (30)

L.B.B 1 year

C10

P. H.G

Poly. urea

Tab Fofidium
(تبع روزانہ) 2+2

B. ache

Piv. discharge

Tab No - No
(تبع روزانہ) 1+1

چھٹی بروز اتوار

کلاڈھیر مردان روڈ نزد پشاور ماڈل سکول چارسدہ

Calwis-D

NAGRA

JAVED Iqbal V. Civil Enla
Daud Law Chamber
Advocate High Court Peshawar
Mob: 0345-405501

ALI MEDICAL CENTRE

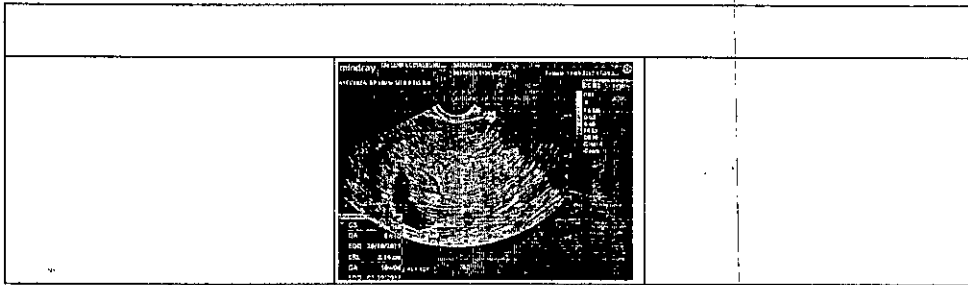
EARLY OBS ULTRASOUND

Tel:091-6512647;0916512647
Kulader near Peshawar Model School
Mardan Road Charsadda

Dr ALI SHAH
M.B.B.S; M.U.S.P.

Dr TALEEMA ALI
M.B.B.S; M.U.S.P.

Date;11-03-2017.Name;SAIRA.W/O;HAMEED.Age;32Years.
Address;MIR ABAD.Ref.By;SELF.Clinical Profile;Wants fetal wellbeing.



TECHNIQUE USED;TVS.

- Enlarged bulky uterus with a gestational sac containing a single embryo in the fundal region eccentrically placed with decidual reaction and with cardiac and somatic activity.
 - CARDIAC ACTIVITY;not seen.
 - SHAPE of SAC ;is Circular.
 - DECIDUAL REACTION;All around.
 - AMNIOTIC FLUID;is adequate in quantity by subjective analysis.
 - BIOMETRY;Gestational Sac Diameter(GSD);3.42cm.Crown Rump Length(CRL);3.14cm.Heart Rate;bm.B.P.D;cm. Yolk Sac;not/ Seen.
 - ADNEXAE;Both ovaries and other pelvic structures are normal.
- ESTIMATED GESTATIONAL AGE ;09Weeks+04Days.
ESTIMATED DATE OF DELIVERY;11/10/2017±15Days.
COMMENTS;LIVE INTRAUTERINE PREGNANCY.

Prepared By;ASMA.

Sonologist;Dr Taleema Ali

JAVED IQBAL
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob: 0345-9405901

ALI MEDICAL CENTRE

EARLY OBS ULTRASOUND

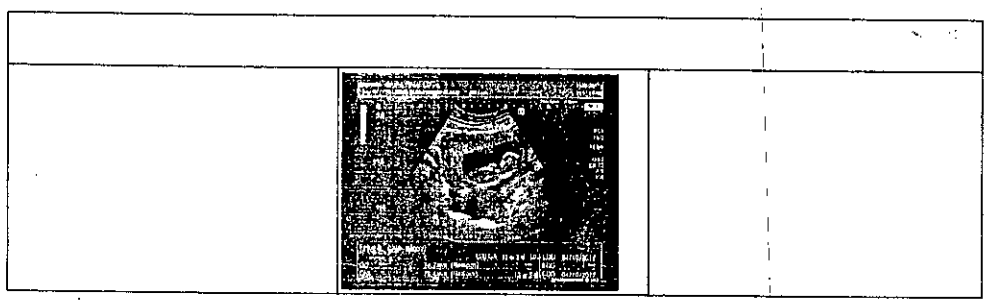
Tel; ;0916512647

Kulader near Peshawar Model School
Mardan Road Charsadda

Dr ALI SHAH
M.B.B.S; M.U.S.P.

Dr TALEEMA ALI
M.B.B.S; M.U.S.P.

Date;01-04-2017.Name;SAIRA.W/O;HAMEED.Age;32Years.
Address;SARKY.Ref.By;SELF.Clinical Profile;Wants fetal wellbeing



TECHNIQUE USED;TAS.

- Enlarged bulky uterus with a gestational sac containing a single fetus in the fundal regioneccentrically placed with decidual reaction and with cardiac and somatic activity.
- CARDIAC ACTIVITY;seen.
- SHAPE of SAC ;is Circular.
- DECIDUAL REACTION;All around.
- AMNIOTIC FLUID;is adequate in quantity by subjective analysis.
- BIOMETRY;Gestational Sac Diameter(GSD);74.7mm.Crown Rump Length(CRL);73.4mm.Heart Rate;135bpm.B.P.D;cm. Yolk Sac;not/ Seen.
- ADNEXAE;Both ovaries and other pelvic structures are normal.

ESTIMATED GESTATIONAL AGE ;12Weeks+02Days.

ESTIMATED DATE OF DELIVERY;11/10/2017±15Days.

COMMENTS;LIVE INTRAUTERINE PREGNANCY.

Prepared By;ASMA.

Sonologist;Dr Taleema Ali

01/04/17

JAVED IQBAL
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob: 0345-9495591

Lady Dr. Taleema Ali



Dr. Ali Sha

M.B.B.S
MCPS (T) Gyn/Obs

Ph:091-6512647

(5)

M.B.B.S
RMP, MUSP

Name: Saira/Hameed

Age AIF

Date 1.4.17

Clinical Record

Rx

Am: 19 weeks

B.P $\frac{110}{80}$ wj

Yes Venen 10
100 5m

Temp = N

Yes Loprin - 75mg

07
+h
P₂ 10⁺
10⁺
n.v. 10⁺

Yes - 100

L.B.B 1 year

Yes 100 5m

C/O

Vomiting

Yes Loprin NSA
100 5m

Syp Remised
100

چھٹی بروز اتوار

Cap MacroBAC 10
100 28m

01/04/17

کلاڈھیر مردان روڈ نزد پشاور ماڈل سکول چارسدہ

Tab Avical-D Syp

Tab Folacta

ALI MEDICAL CENTER

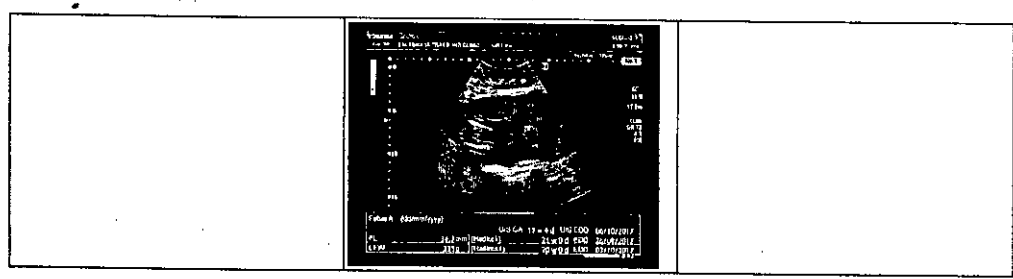
Kulader near Peshawar Model School
Mardan Road Charsadda
Ph: ;0916512647

OBSTETRIC ULTRASOUND

DR ALI SHAH
M.B.B.S:M.U.S.P.

DR TALEEMA ALI
M.B.B.S:M.U.S.P.

DATE:16/05/2017.NAME;SAIRA.W/O;HAMEED.AGE;32Years.
ADDRESS;CHARSADDA.By;SELF.Clinical Profile;Wants fetal wellbeing..



SINGLE active intrauterine fetus with good cardiac and somatic activity.
LIE; longitudinal.
PRESENTATION; cephalic.
POSITION; spine is to mother, right.
PLACENTA; Occupies Fundal region and is positione Anterior. No Placenta previa.Placental Grade;01.
AMNIOTIC FLUID;is adequate in quantity by Subjective analysis.
FETAL BIOMETRY; Head Circumference;125.4mm Occipitofrontal Diameter;54.2mm Biparietal Diameter25.4;mm. Abdominal circumference;147.0mm.Femur length;34.7mm Estimated fetal weight;335grams.Fetal Heart Rate;135bpm.
ESTIMATED GESTATIONAL AGE ;19Weeks+00Days.
ESTIMATED DATE OF DELIVERY;11/10/2017±15Days.
FETAL MORPHOLOGY;Chest;normal.Four chamber view (heart); normal. Stomach; seen.Kidneys Right; normal/Left; normal.Urinary Bladder;normal. Umbilical Cord;Three vessels seen.Spine contour; normal.Head contour,thalami,lateral ventricles,Cerebellum and overall head morhology;normal.
IMPRESSION; CEPHALIC PRESENTATION
Prepared By;NOUREEN
Sonologist;Dr Ali Shah.

JAVED IQBAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar.
Mob: 9345-9495591

ALI MEDICAL CENTER

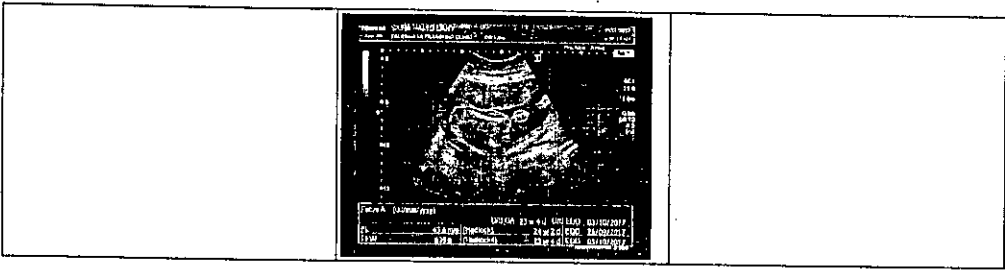
Kulader near Peshawar Model School
Mardan Road Charsadda
Ph: ;0916512647

OBSTETRIC ULTRASOUND

DR ALI SHAH
M.B.B.S:M.U.S.P.

DR TALEEMA ALI
M.B.B.S:M.U.S.P.

DATE;10/06/2017.NAME;SAIRA.W/O;HAMID.AGE;32Years.
ADDRESS;DAKY.By;SELF.Clinical Profile;Wants fetal wellbeing.



SINGLE active intrauterine fetus with good cardiac and somatic activity.
LIE; longitudinal.
PRESENTATION; cephalic.
POSITION; spine is to mother, right.
PLACENTA; Occupies Fundal region and is positioned; Anterior. No Placenta previa. Placental Grade; 01.
AMNIOTIC FLUID; is adequate in quantity by Subjective analysis.
FETAL BIOMETRY; Head Circumference; 202.4mm Occipitofrontal Diameter; 70.9mm Biparietal Diameter; 59.1mm. Abdominal circumference; 188.8mm. Femur length; 43.6mm Estimated fetal weight; 629grams. Fetal Heart Rate; 135bpm.
ESTIMATED GESTATIONAL AGE ; 22Weeks+02Days.
ESTIMATED DATE OF DELIVERY; 11/10/2017±15Days.
FETAL MORPHOLOGY; Chest; normal. Four chamber view (heart); normal. Stomach; seen. Kidneys Right; normal/Left; normal. Urinary Bladder; normal. Umbilical Cord; Three vessels seen. Spine contour; normal. Head contour, thalami, lateral ventricles, Cerebellum and overall head morphology; normal.
IMPRESSION; CEPHALIC PRESENTATION.
Prepared By; ASMA
Sonologist; Dr Ali Shah.

JAVED IQBAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob. 0245-9405501

Lady Dr. Taleema Ali



Dr. Ali Shah

M.B.B.S
M.C.P.S (T) Gyn & Obs

M.B.B.S
RMP, MUSP

Ph: 091-6512647

Patient Name: Sarheed Hamid Age: A Sex: F Date: 10-6-17

Clinical Record
B.P. 140/90
Temp N
Pals 100
L.B.B 110
چھٹی بروز اتوار

Rx
Am. 24mg
Tab Aldomet (50) 107
2T2
Tab Metformin 107
125 107
Tab Loprin-75mg
107
Tab 2-MAC 107
141 25mg
Tab Penfen (100)
107
Tab Spastinim 107
107
Gynormin 107

کلاڈھیر مردان روڈ، نزد پشاور ماڈل سکول چارسدہ

WINZEK 40 & 20

WMALT

ZIDOR

JAVED IONAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

ALI MEDICAL CENTER

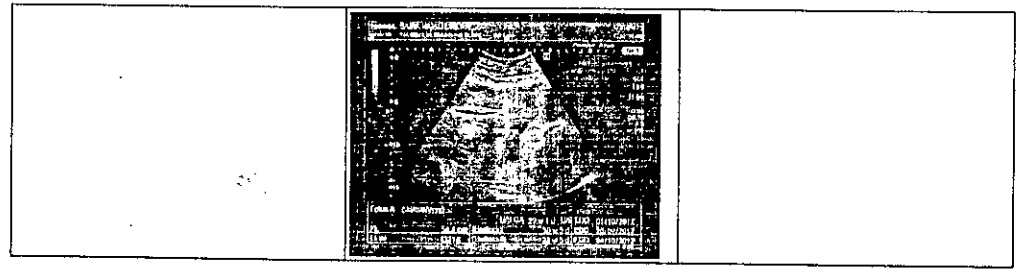
Kulader near Peshawar Model School
Mardan Road Charsadda
Ph: ;0916512647

OBSTETRIC ULTRASOUND

DR ALI SHAH
M.B.B.S:M.U.S.P.

DR TALEEMA ALI
M.B.B.S:M.U.S.P.

DATE:17/07/2017.NAME;SAIRA.W/O;HAMID.AGE;32Years.
ADDRESS;DAKY.By;SELF.Clinical Profile;Wants fetal wellbeing..



SINGLE active intrauterine ↑ fetus with good cardiac and somatic activity.
LIE; longitudinal .
PRESENTATION; cephalic.
POSITION; spine is to mother, left.
PLACENTA; Occupies Fundal region and is positioned; Anterior. No Placenta previa. Placental Grade; 01.
AMNIOTIC FLUID; is adequate in quantity by Subjective analysis.
FETAL BIOMETRY; Head Circumference; 260.8mm Occipitofrontal Diameter; 93.0mm Biparietal Diameter; 73.0mm. Abdominal circumference; 236.5mm. Femur length; 58.0mm Estimated fetal weight; 1321 grams. Fetal Heart Rate; 135bpm.
ESTIMATED GESTATIONAL AGE ; 27Weeks+05Days.
ESTIMATED DATE OF DELIVERY; 11/10/2017±15Days.
FETAL MORPHOLOGY; Chest; normal. Four chamber view (heart); normal. Stomach; seen. Kidneys Right; normal/Left; normal. Urinary Bladder; normal. Umbilical Cord; Three vessels seen. Spine contour; normal. Head contour, thalami, lateral ventricles, Cerebellum and overall head morphology; normal.
IMPRESSION; CEPHALIC PRESENTATION
Prepared By; NOUREEN
Gynecologist; Dr Ali Shah.

JAVED OMAR
Daudkhel Law Chamber
Advocate High Court Peshawar
MOB. 0345-9405501

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Lady Dr. Taleema Ali

M.B.B.S
M.C.P.S (T) Gyn & Obs

Dakky



Ph: 091-6512647

8
3

Dr. Alt Shah

M.B.B.S
RMP, MUSP

Patient Name: Saira / Mamid Age: _____ Sex: F Date: 17/7/15

Clinical Record

Rx AB +ive. Am. 28 weeks.
seen also on Examination pitting Edema
in lower limb

B.P. 120/80

Temp: N.

P2 ↑
P2 ↓

Both of C section

L.B.B 1yr

do

⇒ pain in both renal flank.

⇒ weakness

⇒ Back ach.

Medicine

Tab Adelomed

Tab Loprin 70mg
10

Tab Riam 4mg
10

Tab 2. Mail
10

Tab 50 mg
10

Handwritten notes in Urdu on the right margin.

کلاڈ هير مردان روڈ، نزد پشاور ماڈل سکول چارسده

Incept Tabs

Calplant-D

JAVED IFTIKHAR & Co. Bela
Dauda Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

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ALI MEDICAL CENTER

Kulader near Peshawar Model School

Mardan Road Charsadda

Ph: ;0916512647

OBSTETRIC ULTRASOUND

DR ALI SHAH
M.B.B.S:M.U.S.P.

DR TALEEMA ALI
M.B.B.S:M.U.S.P.

DATE;18/08/2017.NAME;SAIRA.W/O;HAMEED KHAN.AGE;Years.
ADDRESS;SARKY.By;SELF.Clinical Profile;Wants fetal wellbeing..



SINGLE active intrauterine fetus with good cardiac and somatic activity.

LIE; longitudinal.

PRESENTATION; Breech.

POSITION:spine is to mother, right.

PLACENTA:Occupies Fundal region and is positioned;Anterior.No Placenta previa.Placental Grade;01.

AMNIOTIC FLUID;is mildly in quantity by Subjective analysis.

FETAL BIOMETRY; Head Circumference;281.0mm Occipitofrontal Diameter;101.2mm Biparietal Diameter;78.1mm. Abdominal circumference;267.3mm.Femur length;68.2mm. Estimated fetal weight;grams.Fetal Heart Rate;145bpm.

ESTIMATED GESTATIONAL AGE ;32Weeks+02Days.

ESTIMATED DATE OF DELIVERY;11/10/2017±15Days.

FETAL MORPHOLOGY;Chest;normal.Four chamber view (heart); normal. Stomach; seen.Kidneys Right; normal/Left; normal.Urinary Bladder;normal. Umbilical Cord;Three vessels seen.Spine contour; normal.Head contour,thalami,lateral ventricles.Cerebellum an overall head morphology;normal.

IMPRESSION;CEPHALIC PRESENTATION/MILD OLIGOHYDRAMNIOS

Prepared By;ASMA

Sonologist;Dr Ali Shah.

JAVED IQBAL Gul Bela
Deputy Law Chamber
Adv. of High Court Peshawar
Phone: 0245-9405501

AML ALI MEDICAL LAB

MARDAN ROAD NEAR PESHAWAR MODEL SCHOOL CHARSAKDA
0333-8005950 - 0311-9078770

Patient Name:	SAIRA			Date & Time	18/08/2017
Sex	Female	Age:	? Years	Specimen:	Urine
Referred by:	Dr: TALEEMA ALI SHAH			Urine	
Test Required:	Urine Routine Examination. HB.				

Urine Routine Examination

Physical Examination

Quantity	22 ML
Color	Pale Yellow
Reaction (ph)	Acidic
Specific Gravity	Q.N.S

Chemical Examination

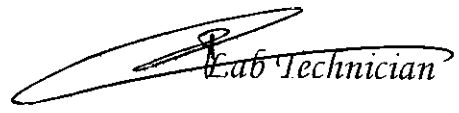
Albumin	(+)
Sugar	NIL

Microscopic Examination

Pus Cells	01-----02	/HPF
Red Cells	01-----02	/HPF
Epithelial Cells	10-----12	/HPF
Mucus Threads	NIL	/HPF
Calcium oxalates	02-----03	/HPF
A-Urates	NIL	/HPF

Heamatology

Hemoglobin	10.5	M: 13 to 18 F: 11 to 16 G/dl
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Lab Technician

JAVED IQBAL Gul Bela
Daudgal Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

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AML ALI MEDICAL LAB

MARDAN ROAD NEAR PESHAWAR MODEL SCHOOL CHARSAKDA
0333-8005950 - 0311-9078770

Patient Name:	Saira			Date & Time	17/07/2017
Sex	Female	Age:	?	Years	
Referred by:	Dr. TALEEMA ALI SHAIH			Specimen:	Urine
Test Required:	Urine Routine Examination.HB.				

Urine Routine Examination

Physical Examination	
Quantity	22 ML
Color	Pale Yellow
Reaction (ph)	Acidic
Specific Gravity	Q.N.S

Chemical Examination	
Albumin	(-)
Sugar	NIL

Microscopic Examination		
Pus Cells	06-----08	/HPF
Red Cells	02-----03	/HPF
Epithelial Cells	Numerous	/HPF
Mucus Threads	NIL	/HPF
Calcium oxalates	10-----15	/HPF
A-Urates	Nil	/HPF

Haematology

Hemoglobin	10.4	M: 13 to 18 F: 11 to 16 G/dl
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Lab Technician

JAVED IQBAL & I. Gul Fela
Daudkhel Law Chamber
Advocate High Court Peshawar
Mob: 0345-9495501

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AML ALI MEDICAL LAB

MARDAN ROAD NEAR PESHAWAR MODEL SCHOOL CHARSAKDA
0333-8005950 - 0311-9078770

Patient Name:	Saira				
Sex	Female	Age:	?	Years	Date & Time
Referred by:	Dr: TALEEMA ALI SHAH			Specimen:	Urine
Test Required:	Urine Routine Examination.HB.				

Urine Routine Examination

Physical Examination

Quantity	22 ML
Color	Pale Yellow
Reaction (ph)	Acidic
Specific Gravity	Q.N.S

Chemical Examination

Albumin	(+)
Sugar	NIL


Microscopic Examination

Pus Cells	02-----04	/HPF
Red Cells	01-----02	/HPF
Epithelial Cells	10-----15	/HPF
Mucus Threads	NIL	/HPF
Calcium oxalates	02-----04	/HPF
A-Urates	NIL	/HPF

Heamatology

Hemoglobin	11.5	M: 13 to 18 F: 11 to 16 G/dl
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Lab Technician


JAVED IQBAL, Gil Rola
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 8345-9495671

(41)

AML ALI MEDICAL LAB

MARDAN ROAD NEAR PESHAWAR MODEL SCHOOL CHARSADEA
0333-8005950 - 0311-9078770

Patient Name:	SAIRA				
Sex	Female	Age:	?	Years	Date & Time
Referred by:	Dr: TALEEMA ALI SHAH			Specimen:	01/04/2017 Urine
Test Required:	Urine Routine Examination.HB.				

Urine Routine Examination

Physical Examination

Quantity	22 ML
Color	Pale Yellow
Reaction (ph)	Acidic
Specific Gravity	Q.N.S

Chemical Examination

Albumin	(+)
Sugar	NIL

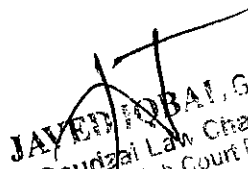
Microscopic Examination

Pus Cells	02-----04	/HPF
Red Cells	01-----02	/HPF
Epithelial Cells	10-----15	/HPF
Mucus Threads	NIL	/HPF
Calcium oxalates	01-----02	/HPF
A-Urates	NIL	/HPF

Heamatology

Hemoglobin	11.8	M: 13 to 18 F: 11 to 16 G/dl
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Lab Technician


JAVED IQBAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

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AML ALI MEDICAL LAB

MARDAN ROAD NEAR PESHAWAR MODEL SCHOOL CHARSAKDA
0333-8005950 - 0311-9078770

Patient Name:	Sara			Report ID. No:	...
Sex	FE	Age:	?	Years	Date & Time
Referred by:	DR: TALEEMA ALI SHAH			Specimen:	Urine
Test Required:	Urine Routine Examination- RBS				

TEST	RESULT	UNITS	NORMAL VALUE
Random Blood Glucose	88	mg/dl	80 to 140

Urine Routine Examination

Physical Examination

Quantity	22 ML
Color	Pale Yellow
Reaction (ph)	Acidic
Specific Gravity	Q.N.S

Chemical Examination

Albumin	(+)
Sugar	NIL

Microscopic Examination

Pus Cells	NIL	/HPF
Red Cells	01-----02	/HPF
Epithelial Cells	08-----10	/HPF
Mucus Threads	NIL	/HPF
Calcium oxalates	02-----04	/HPF
A-Urates	NIL	/HPF


Lab Technician

JAVED ITOBA
Daudzai, Gul Bela
Advocate High Court Peshawar
Mob: 0345-9405501

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Annexure "B"

4

OFFICE OF THE DISTRICT POLICE OFFICER MARDAN

No. 2545-48 FA

Date 25 / 5 / 2012

DISMISSAL ORDER

Lady Constable Saira No. 1623, while posted at Police Lines Mardan, remained absent from duty without any leave/permission of the competent authority vide DD report No. 61 dated 13.12.2011 till date.

In this connection, she was served with a proper Show Cause Notice under NWFP Police Rules 1975, issued vide this office No. 112/PA/SCN/R dated 14.02.2012 and delivered it upon her brother Yasir on 20.02.2012 through local Police.

In compliance, she was bound to submit reply within the stipulated time of fifteen days i-e up-to 06.03.2012, but neither she submitted her reply nor assumed duty till-date, indicating negligence, disinterest and disobedience on her part towards senior officers.

Keeping in view the above facts, there is no possibility to join her Police Service, therefore I have taken ex-parte action against Lady Constable Saira No. 1623 of Police Lines by dismissing her from Police Force from the date of continuously absence i-e 13.12.2011 with immediate effect, in exercise of the power vested in me under the above quoted Rules.

Order announced

(Danishwar Khan)
District Police Officer,
Mardan

O.B No. 1336

Dated 30/4/2012

- Copy for information and necessary action to:-
1. The DSP/Hqrs Mardan.
 2. The Pay Officer, (DPO) Mardan.
 3. The E.C (DPO) Mardan
 4. The OASI (DPO) Mardan with () Enclosures

JAVED ILYAS
Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

محفوظہ - الیکٹرانک ریکارڈ - محمد یونس

محکمہ درجہ اولیٰ کی ملازمت

جہاں تک

آڈیشن ہے۔ میں بطور ایگزیکٹو آفیسر 1623 جولائی 2012ء میں ملازم تھی۔ اور میں 7/8 سال باقاعدگی سے ساتھ ملازمت کرتی تھی۔ لیکن گورنمنٹ حالات سازگار نہ ہونے کی وجہ سے میں ملازمت جاری نہ رکھ سکی۔ جس کی وجہ سے مجھے حورم $\frac{54}{30}$ ملازمت سے نکال دیا گیا تھا۔ مگر حکم مذکورہ نادر ہے۔

1۔ جو حکم ہے گورنمنٹ ملازمت سازگار میں اور ملازمت کرنے کی کوئی گورنمنٹ ریکارڈ نہیں ہے۔ مگر ملازمت کے بارے میں ہر ملازمتی وقت بیانات ملازمت سے تازگی ہے۔ اور میں بالکل بے دردی سے۔ جس کی وجہ سے بالکل شہد گارڈ نہیں رہا ہے۔ اور میں دل جمعی سے ساتھ ملازمت کرتا جا رہی ہوں۔

میں نے ایک حور بارہ آڈیشن کیا۔ جسے دوبارہ ملازمت پر بحال کر کے ملازمت کا حکم صادر فرمائیں۔ میں تازگی سے ملازمت کرنے کی منتظر ہوں۔

20/04/2019
حورم یونس

ڈاکٹر خالد محمد
ڈاکٹر خالد محمد

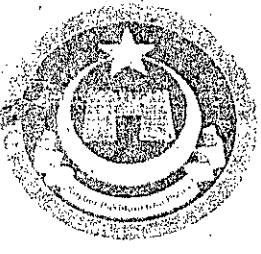
حورم یونس کی گورنمنٹ ملازمت
حال حورم یونس
حورم یونس کی

Secret Branch
for
PSO-II
Mule

JAVED ION
Gul Bela
Daudpur Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

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Annexure 'D'



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 1758 /19, dated Peshawar the 15/05/2019

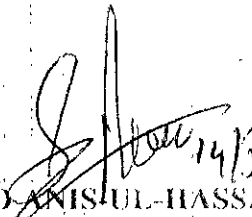
To : The Regional Police Officer,
Mardan.

Subject: APPEAL.

Memo:

The Competent Authority has examined and filed the appeal submitted by Ex-Lady Constable Saira No. 1623 of Mardan District Police against the punishment of dismissal from service awarded by District Police Officer, Mardan vide OB No. 1336, dated 30.04.2012, being bad time barred.

The applicant may please be informed accordingly.


(SYED ANISUL-HASSAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar
13/5/19

~~JAVED SOBANI~~ Gul Bela
Daudpota Law Chamber
Advocate High Court, Peshawar
Mob: 0345-9405501

وکالت نامہ

بعدالت: صاحب سروس ٹریڈنگ
 سائبرہ نام ۱۰/۵/۲۰۱۹
 منجانب ایسٹریٹ ڈیولپمنٹ دعویٰ سروس ٹریڈنگ
 تاریخ ۲۸/۵/۲۰۱۹

بعث تحریر آنکہ مقدرہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی و جوابدہی کے
 بمقام کیلئے جاوید اقبال گل بیلہ ایڈووکیٹ ہائی کورٹ کو بدینہ شرط وکیل
 مقرر کیا ہے۔ کہ میں ہر پیشی کا خود یا بزرگیہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے مقدرہ وکیل
 صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے
 کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر
 مقام کچہری کی کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر
 مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہوں یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر
 من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی
 صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کوکل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور
 صاحب موصوف کو عرضی دعویٰ و اجواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و گرانہ ہر قسم کی درخواست پر دستخط و
 تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل
 کرنے اور ہر قسم کے بیان دینے اور سپرد ثالثی و راضی نامہ فیصلہ برخلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتناعی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف
 کو بشرط ادائیگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا
 اس کے کسی جزوی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا پیرسٹر کو بجائے اپنے یا اپنے ہمراہ
 مقرر کریں اور ایسے مشیر قانون کے ہر امر دہی اور ویسے ہی اختیارات حاصل ہوں گے جیسے کے صاحب موصوف کو حاصل
 ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو
 پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت
 میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا کہ سندر ہے۔
 مورخہ ۲۸/۵/۲۰۱۹ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted

۱۵
 (۱۵/۵)

۲۵/۵/۲۰۱۹

ایسٹریٹ ڈیولپمنٹ
 سروس ٹریڈنگ

C

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

Service Appeal No. 704/2019

Mrs. Saira, Ex-Lady Constale No. 1623,
District Police, Mardan.

.....Appellant

V E R S U S

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawra.
2. District Polie Officer, Mardan.

.....Respondents

REPLY ON BEHALF OF RESPONDENTS No. 1&2

Respectfully Sheweth: -

PRELIMINARY OBJECTIONS

1. That the appellant has got no cause of action.
2. That the appeal is badly time-barred.
3. That the appellant has been estopped by his own conduct to file the appeal.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to the Honourable Tribunal with clean hands.

ON FACTS

1. Pertains to record.
2. Plea taken by the appellant is not plausible because, every Police officer/official is under obligation to discharge duties to the entire satisfaction of high-ups as there is no room for lethargy in this department.
3. Incorrect. Being member of disciplined force, appellant was duty bound to take proper leave or permission of the competent authority but she did not bother to do so rather, willfully and deliberately absented herself from her lawful duty, which shows her lack of interest in discharge of lawful duties.
4. Para incorrect. The appellant while posted at Police Lines, Mardan willfully and deliberately absented herself from her lawful duty without any leave/permission of the competent authority, report in this regard was also entered in daily diary vide No. 61 dated 13-12-2011, Police Lines, Mardan.

On account of her willful absence, appellant was served with show cause notice vide No. 112/PA/SCN/R, dated 14-02-2012 which was duly served upon brother of appellant namely Yasir on 20-02-2012 through her local Police Station.

The appellant was bound to submit her reply but neither she submitted the same nor reported her arrival which clearly depicted that she was no more

interested in her job. It is worthwhile that the appellant absented herself on 13-12-2011 and she was issued show cause notice on 14-02-2012, but during this period, she did not bother either to submit reply or joined his duty, hence, she was awarded appropriate punishment of dismissal from service vide OB No. 1336 dated 30-04-2012, which does commensurate with the gravity of misconduct of appellant.


5. Plea taken by the appellant is not plausible, because, during her absence period she neither submitted reply to the show cause notice nor reported her arrival rather remained absent which clearly depicts her lethargic attitude towards her official duties.
6. Para to the extent of filing departmental appeal is correct, while rest of the para is incorrect hence, denied. Because the appellant got dismissed in the year 2012 while she preferred departmental appeal after laps of about 07 years. Her this conduct also establishes her lethargic attitude, because, she even did not bother to exhaust her legal remedies within a stipulated period rather kept mum for years.
7. That appeal of the appellant is liable to be dismissed on the following grounds amongst the others: -

GROUND

- A. Incorrect. The orders passed by the competent as well as appellate authority are in accordance with law, facts, norms of natural justice and materials available on record, hence, tenable in the eye of law.
- B. Incorrect. Neither the respondent department has any grudges against the appellant nor she has been treated against the law. Hence, plea of the appellant is not plausible.
- C. Incorrect. As discussed earlier, the appellant was issued show cause notice and she was bound to submit her reply to the said notice but neither she submitted her reply to the same nor reported her arrival rather remained absent. It is worthwhile that the appellant absented herself on 13-12-2011 and she was issued show cause notice on 14-02-2012, but during this period, she did not bother either to submit reply or joined his duty, hence, she was awarded appropriate punishment of dismissal from service vide OB No. 1336 dated 30-04-2012, which does commensurate with the gravity of misconduct of appellant.
- D. Incorrect. Plea taken by the appellant is totally ill founded because, being member of disciplined force, she was required to take proper leave or permission if she was suffering from any illness, but in order to give legal cover to her long absence, she took the plea of her illness which is not based on facts.

- E. Para already explained needs no comments.
- F. Incorrect. The appellant was provided opportunity of defending herself by issuing show cause notice but she bitterly failed to submit her reply to the same. Hence, plea regarding personal hearing is completely out of question.
- G. Incorrect. Plea taken by the appellant is not plausible.
- H. Para not related, needs no comments.
- I. Incorrect. Length of service, unblemished record and no complaint do not exonerate any Police Officer/Official from future wrong deeds.
- J. Incorrect. The very conduct of the appellant is lethargic because she did not bother either to submit reply to the show cause notice or reported her arrival.
- K. That the respondents also seek permission of this Honourable Tribunal to raise additional grounds at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of above submissions the appeal of the appellant may very kindly be dismissed with cost through out.


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Respondent No.1**


**District Police Officer,
Mardan
Respondent No.2**

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

Service Appeal No. 704/2019

Mrs. Saira, Ex-Lady Constale No. 1623,
District Police, Mardan.

.....Appellant


V E R S U S


1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawra.
2. District Polie Officer, Mardan.

.....Respondents

COUNTER AFFIDAVIT.

We, the respondents do hereby declare and solemnly affirm on oath that the contents of the Para-wise comments in the service appeal cited as subject are true and correct to the best of our knowledge and belief and nothing has been concealed from this Honourable Tribunal.


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Respondent No.1**


**District Police Officer,
Mardan
Respondent No.2**

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

Service Appeal No. 704/2019

Mrs. Saira, Ex-Lady Constale No. 1623,
District Police, Mardan.

.....Applicant

V E R S U S

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawra.
2. District Polie Officer, Mardan.

.....Respondents

REPLY TO THE APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth: -


PRELIMINARY OBJECTIONS


1. That the applicant has no cause of action to file the instant application.
2. That the application is barred by law.

Facts

1. That the appeal filed by the applicant before this Honourable Tribunal may kindly be dismissed being a badly time barred.
2. That application of the applicant is liable to be dismissed because she in order to save her skin in terms of limitation issue propounded the story of her alleged illness.
3. Incorrect. As the apex court of Pakistan has held that the question of limitation cannot be considered a "technicality" simpliciter as it has got its own significance and would have substantial bearing on merits of the case.
4. Incorrect. Plea taken by the applicant is not plausible because, no sound reason has been mentioned for condonation of delay.
5. Incorrect. Stance of the applicant is devoid of legal footing.

It is therefore, most humbly prayed that on acceptance of above submissions, the instant application may very kindly be dismissed.


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Respondent No.1**


**District Police Officer,
Mardan
Respondent No.2**

OFFICE OF THE DISTRICT POLICE OFFICER MARDAN

No. 112 /PA/SCN/R

Date 14-2- /2012

53
57484

SHOW CAUSE NOTICE UNDER POLICE RULES 1975

Whereas, you Lady Constable Saira No. 1623, while posted at Police Lines, remained absent from duty without any leave/permission of the competent authority vide DD report No. 61 dated 13.12.11 till-date.

You are therefore, found guilty of misconduct, as defined in section 2 (iii) of NWFP Police Rules 1975 and as such are liable to action under section 3 of the said Rules.

Based on the above facts, I am satisfied that no enquiry is needed in this case as contained in section 5. 3 clauses (a) & (c) under the said Rules.

Now, therefore you lady Constable Saira No. 1623 are called upon under section 4 (1) of the NWFP Police Rules 1975, to show cause within 15 days of the issuance of this notice, as to why one or more penalties including major penalty of dismissal from service should not be imposed upon you.

NOTE.

Take note that if you failed to submit reply in compliance of this show cause notice within the stipulated time, it will be presumed that you have nothing to offer in your defense and in that case, an ex-parte action shall straightaway be taken against you without any further notice.

24/5-18/12
2-5-12

(Dr. Syed Zeeshan Reza)PSP
District Police Officer,
Mardan

Copy to SHO Saddar, (Attention Moharrar) with the directions to deliver this notice upon lady Constable Saira s/o Adil Muhammad r/o Nawan Killay Gujar Garhi and the receipt thereof should be returned to this office within (05) days positively.

53
12

Handwritten signature in Urdu script.

SHO Rs Saddar 16-02-12

این یک قطع شکرانوں بنا
سائے 1823 و 1824
کے لئے
The date of the
signature is Pe Moha
3/10/1824

خان ولد عبدالعزیز
یار
نواں شکرانوں گورنمنٹ

ضیاء علی
اینک قطع شکرانوں کے لئے
1823/1824
بارداشت یا خان بہ قصیم کا آمد بڑا اولاد

ایمال مزید
Si-inchang
20/12/92

Six
Revised

Sitob Sadele
20/02/12

Dismissed
from service
with immediate
effect
BR

10

پولیس لائن

تقدیر 6 روز ٹائم 13/12/11

در 6 روز پولیس لائن صافقت 17/40 مع مورخہ 13/12/11 درج
غیر ملکی سٹیٹ بینک سے سائبر 33/6/11 کو حوالہ دے کر روز ٹائم
10/11/11 سے 14/11/11 تک ملازمین کو سہولت کی گئی تھی جس کی طرف
مطالعہ بھی تا حال ظاہر نہ آ رہا ہے خلاف رپورٹیں منظور
درج روز ٹائم پورے نقد نوٹوں مناسب کارروائی ارسال
لہذا ان بالابوستی

صائب عالی
نقل عیاشی اطلاع

M.A. P. Kh
20-12-11

PO stop pay.

32
OB 4/1/12

DIP Mardan

Sir,

Forwarded for departmental action.

Account

DIP Mardan
20-12-2011

Farooq
P. P. Kh

25-12-11

در پولیس لائن کے اطلاع دی کہ لٹیٹی

تعمیر سائبر 33/6/11 کو حوالہ دے کر روز ٹائم 13/12/11

سے برقرار رکھیں مقررہ
30.4.2012

OFFICE OF THE DISTRICT POLICE OFFICER MARDAN

No. 2545-48 PA

Date 2-5 /2012

DISMISSAL ORDER


1623
Lady Constable Saira No. 1623, while posted at Police Lines Mardan, remained absent from duty without any leave/permission of the competent authority vide DD report No. 61 dated 13.12.2011 till-date.

In this connection, she was served with a proper Show Cause Notice under NWFP Police Rules 1975, issued vide this office No. 112/PA/SCN/R dated 14.02.2012 and delivered it upon her brother Yasir on 20.02.2012 through local Police.

In compliance, she was bound to submit reply within the stipulated time of fifteen days i-e up-to 06.03.2012, but neither she submitted her reply nor assumed duty till-date, indicating negligence, disinterest and disobedience on her part towards senior officers.

Keeping in view the above facts, there is no possibility to join her Police Service, therefore I have taken ex-parte action against Lady Constable Saira No. 1623 of Police Lines by dismissing her from Police Force from the date of continuously absence i-e 13.12.2011 with immediate effect, in exercise of the power vested in me under the above quoted Rules.

Order announced


(Danishwar Khan)
District Police Officer,
Mardan

O.B No. 1336 Dated 30/4 /2012.

Copy for information and necessary action to:-

1. The DSP/Hqrs: Mardan.
2. The Pay Officer, (DPO) Mardan.
3. The E.C (DPO) Mardan
4. The OASI (DPO) Mardan with (4) Enclosures

Handwritten notes at the bottom of the page, including a signature and date.

محفوظہ - ایڈووکیٹ جنرل صاحبہ - محمد یونس پٹو

رہم درخواست برادری کی ملازمت

نذر پیش ہے۔ کہ میں بطور ایڈووکیٹ جنرل 1623 عدالت پولیس
 میں ملازم تھی۔ اور میں 7/8 سال باقاعدگی ساتھ ملازمت کرتی تھی۔
 لیکن گورنمنٹ ملازمت سے ریٹائر ہو گئی ہے۔ میں ملازمت
 جاری نہ رکھ سکی۔ جسکی وجہ سے مجھے حرم 04/30 ملازمت سے
 نکال دیا گیا۔ نیز حکم مذکورہ ہے۔

اس وقت میں گورنمنٹ ملازمت سے ریٹائر ہو چکی ہوں اور
 گورنمنٹ ملازمت سے ریٹائر ہو چکی ہوں۔ میں ملازمت سے ریٹائر
 ہونے کے بعد ملازمت سے ریٹائر ہو چکی ہوں۔ اور میں بالکل
 دل جمعی ساتھ ملازمت کرنا چاہتی ہوں۔

نذر آج کے دوران نذر پیش ہے۔ کہ مجھے دوبارہ ملازمت پر
 بحال کر جانے کا حکم صادر ہو جائے۔ میں تازگیٹ ڈیپارٹمنٹ میں
 04/20

20/04/2019 حرم یونس پٹو 1623 عدالت پولیس
 دفتر عادل محمد

حرم یونس پٹو گورنمنٹ ملازمت سے ریٹائر ہو چکی ہیں
 حال حرم محمد یونس پٹو
 رہائش گاہ: امیر آباد، لاہور

Sumat Porouch
 JAVED IOP, Gul Bela
 Daudpur Law Chamber
 Advocate High Court Faisalwar
 Mob. 0345-9485507
 PSD-II
 Mulca

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

Service Appeal No. 704/2019

Mrs. Saira, Ex-Lady Constale No. 1623,
District Police, Mardan.

.....Appellant


V E R S U S


1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawra.
2. District Police Officer, Mardan.

.....Respondents

AUTHORITY LETTER.

Mr. Atta-ur-Rahman Inspector Legal, (Police) Mardan is hereby authorized to appear before the Honourable Service Tribunal, Khyber Pakhtunkhwa, Peshawar in the above captioned service appeal on behalf of the respondents. He is also authorized to submit all required documents and replies etc. as representative of the respondents through the Addl: Advocate General/Govt. Pleader, Khyber Pakhtunkhwa Service Tribunal, Peshawar.


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Respondent No.1


District Police Of
Mardan
Respondent