

**BEFORE THE KHYBER PUKHTOONKHW
SERVICE TRIBUNAL AT PESHAWAR**

Service Appeal No. 235 of 2022

Hazrat Ali S/O Bakht Kamal Resident of shagai Saidu Sharif swat.

....Appellant

VERSUS

- (1) Director General (Research) Live Stock and Dairy Development Department Khyber Pukhtun Khwa at Peshawar.
- (2) Dr. Syed Rahim Ullah Shah Regional Director / Principal Research officer Veterinary Research and Disease Investigation Centre Balogram Swat.

..RESPONDENTS

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Petitioner
Through Counsel
ARSHAD IQBAL ADVOCATE
Address: Continental Plaza
Makanbagh, Mingora District Swat
Cell No. 03468333750

Arshad Iqbal

①

**BEFORE THE KHYBER PUKHTOONKHWA
SERVICE TRIBUNAL AT PESHAWAR**

Service Appeal NO. 235 of 2022

Hazrat Ali S/O Bakht Kamal Ex: Naib Qasid (BPS-03) office
of Research Live Stock and Dairy Development Department
Khyber pukhtoon Khwa Present Address Mohalla shagai
Saidu Sharif District swat.

....Appellant

VERSUS

- (1) Director General (Research) Live Stock and Dairy
Development Department Khyber Pukhtun Khwa at
Peshawar.
- (2) Dr. Syed Rahim Ullah Shah Regional Director /
Principal Research officer Veterinary Research and
Disease Investigation Centre Balogram Swat.

..Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER
PUKHTOONKHWA SERVICE TRIBUNAL ACT , 1974 AGAINST THE
ORDER DATED 15/11/2021 PASSED BY RESPONDENT NO 2
WHEREBY MAJOR PENALTY OF DISMISSAL/ REMOVAL FROM
SERVICE WAS IMPOSED UPON THE APPELLANT IS AGAINST THE
LAW, RULES AND FACTS, HENCE TO BE SET ASIDE , FEELING
AGGRIEVED FROM THE SAME THE APPELLANT REFERRED A
DEPARTMENTAL APPEAL BEFORE THE RESPONDENT NO 1 BUT
THE SAME WAS ALSO DISMISSED / REJECTED ON DATED
04/01/2022 NOW BOTH THE ORDERS OF THE RESPONDENTS ARE
LIABLE TO BE SET ASIDE.

PRAYER:

That on acceptance of this service appeal the impugned orders may very kindly be set aside and the appellant may also be re-instated back into service with all back consequential benefits.

Respectfully Sheweth:

Facts:

- 1. That the appellant joined the office of Veterinary Research and Disease Investigation Centre being Naib Qasid (BPS-03) at Balogram on 15/12/2015 and since performed his duties with utmost devotion regularity and bravely without any complaints either by authorities or general public. (Copy Of The Appointment Is Attached As Annex: A)*
- 2. That the appellant while posted as Naib Qasid (BPS-3) at Balogram Research Centre at Swat and also performed his duty bravely and honestly. Respondents issued Show Cause Notice Letter on Dated 29/01/2021 in which Respondents stated that the appellant did not perform his duty from last 3 months and also absent from his service/ office. The appellant in rebuttal filed an Application along with medical certificates/ Receipts regarding his illness. (Copies of Show Cause Notice*

and Medical Certificates/ Receipts is attached as ANNEX :B, and B1)

3. That on the above reports / certificates the Respondent no 2 without constituted Hearing Committee who passed an illegal / vide order without hearing of the Appellant the impugned/ Removal order of the Appellant on Dated 15/11/2021. (Copy of the Removal Order Dated 15/11/2021 is attached as ANNEX :C)
4. That feeling aggrieved the Appellant had filed a Departmental Appeal before Respondent no 1 in which Appellant Categoricaly denied allegations of the respondents no 2 and once again referred his Medical Certificates/ Receipts of illness. (Copy of the Departmental Appeal is attached as ANNEX:D)
5. That the respondent no 1 vide the impugned order Dated 04/01/2022 dismissed/rejected Departmental appeal of the appellant. (Copy of the impugned order Dated 04/01/2022 is attached as ANNEX:E)
6. That still feeling aggrieved and having no other quick and efficacious remedy available to the appellant this Honourable Tribunal is approached on the following grounds

Grounds:

- a. That under the law for the imposition of major penalty a full pledge inquiry is mandatory under the law and rules of the subject, but in the instant case none of the caudal formalities have been observed thus making the whole process a nullity in the eyes of law and the same the appellant has not been treated in accordance with the law.
- b. That the respondents have condemned the appellant as unheard as neither any chance of personal hearing was afforded to the appellant nor was the appellant given any chance either to cross examine the witnesses or rebut the evidence used against him. More so no show cause notice, if any, has neither been issued nor even been served upon the appellant.
- c. That the respondents have misused their official authority in a very fanciful, arbitrary and colourful manner, which the law never approves of.
- d. That the appellants has never committed any act of commission or omission which may constitute any offence under any law.
- e. That the respondents with collusion of the concerned ministers removed appellant from service without any

legal proceedings because appellant once mentioned out irregularities in the concerned department.

f. That the concerned ministers is also neighbour of the appellant that's why the concerned minister were overwhelmed appellant to perform his duty in his house instead of appellant office .

It is , therefore, very respectfully prayed that on acceptance of this appeal both the orders impugned may very kindly be set aside and the appellant reinstated back into service with all back /consequential benefits.

Any other relief deemed appropriate in the circumstances and not specifically prayed for may also very kindly be granted.

**Appellant
Through Counsel**



**ARSHAD IQBAL ADVOCATE
HIGH COURT SWAT.**

BEFORE THE KHYBER PUKHTOONKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ of 2022

Hazrat Ali S/O Bakht Kamal Ex: Naib Qasid (BPS-03) office of Research Live Stock and Dairy Development Department Khyber pukhtoon Khwa Present Address Mohalla shagai Saidu Sharif District swat.

....Appellant

VERSUS

- (1) Director General (Research) Live Stock and Dairy Development Department Khyber Pukhtun Khwa at Peshawar.
- (2) Dr. Syed Rahim Ullah Shah Regional Director / Principal Research officer Veterinary Research and Disease Investigation Centre Balogram Swat.

.Respondents

AFFIDAVIT

I, Hazrat Ali S/o Bakht Kamal R/O Shagai Saidu Sharif Tehsil Babuzai District Swat.. Appellant do hereby states on oath that the contents of the above Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed intentionally therein. Moreover, no such like Appeal is pending before this court or any other competent court/forum.

Hazrat Ali
28/12/2022

Hazrat Ali

DEPONENT

Hazrat Ali

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BEFORE THE KHYBER PUKHTOONKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ of 20222

*Hazrat Ali S/O Bakht Kamal Ex: Naib Qasid (BPS-03)
office of Research Live Stock and Dairy Development
Department Khyber pukhtoon Khwa Present Address
Mohalla shagai Saidu Sharif District swat.*

....Appellant

VERSUS

- 1) *Director General (Research) Live Stock and Dairy
Development Department Khyber Pukhtun Khwa at
Peshawar.*
- 2 *Dr. Syed Rahim Ullah Shah Regional Director / Principal
Research officer Veterinary Research and Disease
Investigation Centre Balogram Swat.*

..Respondents

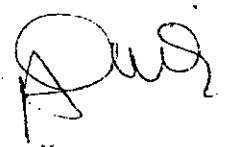
MEMO OF ADDRESSESS

Address of Appellant

*Hazrat Ali S/O Bakht Kamal Ex: Naib Qasid (BPS-03) office
of Research Live Stock and Dairy Development Department
Khyber pukhtoon Khwa Present Address Mohalla shagai
Saidu Sharif District swat.*

Addresses of Respondents:

- (1) *Director General (Research) Live Stock and Dairy
Development Department Khyber Pukhtun Khwa at
Peshawar.*
- (2) *Dr. Syed Rahim Ullah Shah Regional Director /
Principal Research officer Veterinary Research and
Disease Investigation Centre Balogram Swat.*



Appellant Through Council
ARSHAD IQBAL ADVOCATE
HIGH COURT

BEFORE THE KHYBER PUKHTOONKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ of 2022

Hazrat Ali S/O Bakht Kamal Ex: Naib Qasid (BPS-03) office of Research Live Stock and Dairy Development Department Khyber pukhtoon Khwa Present Address Mohalla shagai Saidu Sharif District swat.

....Appellant

VERSUS

- (1) *Director General (Research) Live Stock and Dairy Development Department Khyber Pukhtun Khwa at Peshawar.*
- (2) *Dr. Syed Rahim Ullah Shah Regional Director / Principal Research officer Veterinary Research and Disease Investigation Centre Balogram Swat.*

.....Respondents

CERTIFICATE

I, ARSHAD IQBAL ADVOCATE District Courts Swat. do hereby stated that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed intentionally therein. Moreover, no such like Appeal is pending before this court or any other competent court/forum.



ARSHAD IQBAL
ADVOCATE HIGH COURT

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**VETERINARY RESEARCH & DISEASES INVESTIGATION CENTER,
BALOGRAM, SWAT**

ORDER

Consequent upon on the recommendation of the Departmental Selection Committee Mr. Hazrat Ali S/O Bakht Kamal is hereby appointed against the vacant Post of Naib Qasid (BPS-I) at Veterinary Research & Diseases Investigation Center, Balogram, Swat (Rs.6210-195-12060 @ 2015) plus usual Allowances as admissible under the rules, on regular basis with immediate effect subject to his willingness to the following terms & conditions:-

Terms & Conditions

1. His service will be considered regular and is entitled to General Provident fund (G.P.Fund) in such a manner and at such rates as may be prescribed by the Government under Khyber Pakhtunkhwa Civil Servants (Amendments) Act, 2013.
2. His service will be liable to termination on one month notice from either side. in case of resignation without notice; one month pay & allowances shall be forfeited to Government ex-chequer.
3. The appointee should join his post within 30 days of the issue of this order.
4. His appointment will be subject to medical fitness and verification of antecedent/ character from Police Department.
5. He will be on probation for a period of one year extendable for another one year.
6. He will be governed under such rules and regulations as may be issued from time to time by the Government.
7. His service can be terminated at any time, incase his performance is found unsatisfactory during probationary period. In case of misconduct, he will be proceeded against the Khyber Pakhtunkhwa, Efficiency & Disciplinary Rules 2011 and the rules framed from time to time.
8. His pay will be fixed under the normal rules of the Government of Khyber Pakhtunkhwa, on joining his duty.
9. His appointment will be stand cancelled and he will have to refund all emoluments drawn from Government ex-chequer if at any stage his documents are found Fake/Bogus.
10. He will have to produce medical certificate from the medical superintendent.
11. No TA/DA will be allowed to the appointee for joining his duty.
12. His service/ appointment will be subject to the verification of his certificate from the concerned Institution for which the charges of checking will be paid by the appointee.

If the above terms & conditions of the appointment are acceptable to him, he should immediately submit his arrival report to the Principal Research Officer / Regional Director, Veterinary Research & Diseases Investigation Center, Balogram, Swat for duty within 30 days from the date of issue of this order.

DR. SHAMSIER ALI
PRO/Regional Director

No. VR&DIC/Swat/ 734-39

Dated 15/12/2015

Copy of the above is forwarded to: -

1. Special Assistant to the Chief Minister for Livestock, Fisheries and Cooperative Department of Government of Khyber Pakhtunkhwa, Peshawar
2. Director General (Research), Livestock & Dairy Development, Department. Khyber Pakhtunkhwa, Peshawar along with photo copy of relevant documents for office record.
3. The District Accounts Officer, Saidu Sharif Swat.
- ✓ 4. Mr. Hazrat Ali S/O Bakht Kamal R/O Mohalla Shagai Saidu Sharif, Tehsil & District Swat
5. Personal file of the Official concerned.
6. Office Order File

DR. SHAMSIER ALI
PRO/Regional Director



Veterinary Research & Disease Investigation
Center Balogram, Swat

Ph & Fax: 09469240259



No.VR&DIC/ SW/2015-16/ 927

Dated: 31/03/2016

To

District Comptroller Officer
District Swat.

Subject: **APPOINTMENT OF MR. HAZRAT ALI AS NAIB QASID (UPPER AGE)**

It is stated that Mr. Hazrat Ali S/O Bakht Kamal was appointed as Naib Qasid in Veterinary Research & Diseases Investigation Center, Swat vide Order No. VR&DIC/Swat/734-39 dated 15/12/2015 (Copy attached Annex-A).

Under the recruitment rules of the Dept: promulgated vide No. SO(L&DD)AD-E-1(381)2008/VRI dated 16/12/2008 following method of recruitment for the post of Naib Qasid etc has been prescribed (Annexure-B).

| S.No. | Nomenclature of the post | Qualification prescribed for appointment by initial recruitment | Age Limit | Method of recruitment |
|-------|--------------------------|---|-----------|------------------------|
| 40 | Naib Qasid etc | Preferable Literate | 18-40 | By Initial recruitment |

The Govt: of Khyber Pakhtunkhwa vide notification No. SOE-III(E&AD)2-1/2007 dated 09-12-2010 has made following rules for initial appointment to civil post for relaxation of upper age limit as described in below table (attached at Annexure-C.)

| S.No | Category of candidates | Age relaxation admissible |
|------|--|--|
| 01 | 02 | 03 |
| i | Government Servants who have completed 02 years continuous service. | Upto ten years Automatic Relaxation. |
| ii | Candidates belonging to backward areas as specified in the Appendix attached herewith. | Three Years Automatic Relaxation. |
| iii | General Candidates. | Upto two year by the appointing authority and exceeding two years upto five years by the Establishment Department (C.M). |
| iv | Widow or Son or Daughter of a deceased Civil servant who died during service and son/brother in case of a Shaheed of Police Department | Discretion of the appointing authority |
| v | Disabled persons / divorced woman / widow. | Ten years Automatic Relaxation. |

o/c
District
30/03/2016

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In the above rules it has been Clarified that maximum age limit as prescribed in the recruitment rules of a department shall be relaxed in respect of the candidates mentioned in column: No. 02 to the extent mentioned against each in column: No. 03 of the above table.


The candidates fall under S.No. ii of backward area have 03 years automatic relaxation.

It is evident from the above relaxation and appendix that SWAT DISTRICT also fall in the list of backward area and hence the candidate belong to Swat District are eligible for automatic relaxation of 03 years .

The age of Mr. Hazrat Ali on the last date of applications was 41 years 08 months & 07 days, (about 02 years above the normal age limit prescribed in the recruitment rules of the Deptt.), therefore, under the above age relaxation notification Mr.Hazrat Ali is eligible for 03 years age relaxation beyond the age limit prescribed in the service rules. As such no age relaxation is required to be sought out from competent authority.

It is therefore requested that the source proforma is returned and may be accepted so that the appointee may not put to financial and mental stress please.

(Source Proforma attached)


DR.SHAMSHER ALI KHAN
PRO/Regional Director
VR&DIC Balogram Swat

7^a



Veterinary Research & Disease Investigation Center
Balogram, Swat.

Pbfax: 0916-9240259, GPO, Saidu Sharif, Swat PO, Box# 3, Email: info@vrdic.gov.pk, Website: www.vrdic.gov.pk
Facebook Page: <https://www.facebook.com/vrdicswat/>, Twitter Account: <https://twitter.com/vrdicswat>



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No. RD/VR&DIC/Sw/Estt/PF/N.Gztt(25)/2017/

Dated 29/10/2021

SHOW CAUSE NOTICE

I, Dr. Sayyed Rahimullah Shah, Regional Director/ PRO, Veterinary Research & Disease Investigation Center, Balogram, Swat as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Disciplinary) Rules-2011, do hereby serve you [Mr. Hazrat Ali, Naib Qasid (BPS-03)] the Show cause notice [under Rule- 5(a)] as follow:

1. Whereas;

i. You have been proved guilty of misconduct under Rule 3(b) by remaining willfully absent from Govt duty w.e.f 01 Sep, 2021 to 20 Oct, 2021 without any legal approval from the competent authority in spite of your undertaking on stamp paper regarding non repeating of the habitual absenteeism.

ii. You have been proved guilty of misconduct under rule 3(b) E&D rule 2021 by misleading/ deceiving this office by showing undue medical certificates, and reports for undue/ illegal causes

iii. You pretended to be sick with COVID-19 and then onward a communicable disease (Tuberculosis) but could not submitted medical test/ reports to meet the legal requirements.

iv. You have been asked to explain persistent willful absenteeism but your response has been found to be contrary to the facts and adversely exerting extraneous pressure violating conduct rules 1989-

v. You have been found guilty of misconduct due to habitual absenteeism [under Rules-3 (b) & (d)] since your induction in to the government services.

vi. This before you were found willfully absent from the official duty consecutively w.e.f. 22 Mar, 2021 to 17 May, 2021 and in consequence an inquiry was conducted vide this office order No. RD/VR&DIC/Sw/Estt/(332)/2017/3227-31 dated. May 17, 2021] against you [under Rule-5 of the E&D Rules 2011, which for you were given minor penalties base on compassionate/ humanitarian ground vide this office order [No. RD/VR&DIC/Sw/Estt/(332)/2017/3350-62 dated July 01, 2021].

vii. You were given minor penalties on basis of your affidavit surety bond on the stamp paper of 100 rupees dated. July 05, 2021 in which you committed to refrain from such habitual absenteeism, mala practices, blackmailing the office from unfair means, with adverse experience.

ii. On going through the materials on record and other connected papers (ancillary & auxiliary record) including your defense before this and provision of opportunity of personal hearing [under the Rule-15 of the Rules ibid].

I am satisfied [under Rule-14(4)] that you have committed acts/ omissions specified in Rule-3 of the Rules ibid that you:

(a). Guilty of misconduct due to habitual absenteeism [under Rules-3 (b) & (d)] since your induction in to the government services

(b). Guilty of corrupt practices, [under the Rule-3(C) of the Rules ibid] polluting the environment and office decorum bent on raising mischief by the immoral acts and behaviors inclusive of a lane of chasing people (money lenders) being borrower.

(c). Guilty of habitual late comer & early leave: while arriving office while attending the duty [under the Rule-3 (a) of the Rules ibid].

(d). Guilty of intimidating and blackmailing the officers, (In-charges in particular) [under the Rule-3 (b) of the Rules ibid].

(e). Ceased to be efficient [under the Rule-3 (a) of the Rules ibid] inclusive of willful absence from official duty consecutively w.e.f. 01 Sep, 2021 to 20 Oct, 2021

2. On account of the above acts committed willfully [has been in practice since your induction in to the government services] and having been proved against you;

I, Dr. S. Rahimullah Shah, Regional Director / PRO, Veterinary Research & Disease Investigation Center, Balogram, Swat in the capacity of Competent Authority has provisionally decided to impose upon you penalty of removal from services in accordance with rule 4 (b) (iii) of E&D Rules 2011.

Despite having sufficient proofs and ground for terminating your services[under Rule-5]; this office serves; upon you a show cause notice [in-accordance with the Rule-14(4)] providing you the reasonable opportunity of showing cause against the penalties [under Rule-14(4)(b)] proposed to be imposed upon you as per provision of Rule-4 of the Rule ibid to clarify your position, in order to meet the justice requirements.




3. You are therefore required to show cause as to why the aforesaid penalty /penalties should not be imposed upon you, despite sufficient grounds are available on record?
4. If you wish to be heard in person [in-accordance with the Rule-14(5) of the Rule ibid], you can meet the nominated committee under the chair of In-charge Admin/ SRO (BPS-18) any working day in duty hours with calm and human behaviors.
5. Your written reply should reach the undersigned within 15 days [under the Rule 14(4)(b) of the Rule ibid] of the receipt of this show cause notice; otherwise ex-parte action will be taken against you under the rules ibid please.

(Dr. S. Rahimullah Shah)
DVM, M. Phil (SAU)
Regional Director/PRO
Dated. 29/10/2021

No. RD/VR&DIC/Sw/Estt/PF/N.Gztl/(25)/2017/4065-69

Copy of the above is forwarded for information and necessary action to the;

1. Director General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar w/r to our telephonic discussion in this regard on dated. 29 Oct, 2021 please.
2. In-charge Admin/ SRO, Vety Research & Disease Investigation Center, Balogram, Swat. He is nominated chairman of the personal hearing committee, comprising of Dr. Hazrat Salman Siddique, (Research Officer) & Dr. Shakirullah Khan, (Research Officer) to meet the justice requirement.
3. Dr. Hazrat Salman Siddique, & Dr. Shakirullah Khan, members of the personal hearing committee.
4. ✓ Mr Hazrat Ali. (Niab Qasid), Vety Research & Disease Investigation Center, Balogram, Swat for due legal compliance.
5. File No. 332/2017 for record please


(Dr. S. Rahimullah Shah)
DVM, M. Phil (SAU)
Regional Director/PRO
29/10/21

Medical No. 2 RS. 10

OUT-PATIENTS DEPARTMENT

No. _____
NAME _____
YEARLY NO. _____
DATE _____

OUT-PATIENTS DEPARTMENT

No. _____ RS. 10
NAME Shree
YEARLY NO. 98908
DATE 10 SEP 2021

DISEASE SA. (S. I. J) [unclear]
FACE VALUE RUPEES 10/-

(12)

Medical No. 2 RS. 10

OUT-PATIENTS DEPARTMENT

No. _____
NAME _____
YEARLY NO. _____
DATE _____

OUT-PATIENTS DEPARTMENT

No. _____ RS. 10
NAME Shree
YEARLY NO. 98004
DATE 07 SEP 2021

DISEASE fever, cough, malaise
FACE VALUE RUPEES 10/-

SPQ = 987 on RA
Bp 120/110 Hgts

CB
RB
David
PEAR

Medical Officer
Sidu Group of Teaching
Hospitals Swat.

Aspirin
77
79b - Mofenid
320 - J [unclear]
Syp - Steven
Syp - Synsting
360 - [unclear]
360 - [unclear]

Handwritten notes in the top section of the form, including names and dates:

- Dr. Franklin
- Dr. Gumpel
- Dr. Goodkind
- 9/11/76
- 9/13/76

OUTPATIENTS DEPARTMENT
NAME: [Handwritten Name]
YEARLY NO: 4634
DATE: 9/11/76
DISEASE: [Handwritten Disease]

OUTPATIENTS DEPARTMENT
NAME: [Handwritten Name]
YEARLY NO: [Handwritten Number]
DATE: [Handwritten Date]
DISEASE: [Handwritten Disease]

FACE VALUE RUPEES 10/-

12

GD&PD.1650/41. FS-30,000. Pad-02-12-16/PA(2) From Store Jobs/Med.2

Medical No. 2

Rs. 10

No.

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO

DATE

No.

Rs. 10

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO

DATE

DISEASE

FCP

99218

13 SEP 2021

Previously
- Night sweats
- fever (low grade)
- weight loss

Now!
- loose motion - 2 days (7-8 episodes per day)
- Abdominal pain

BP = 150/100

Ix

- Sputum AFB with genexpat

- RFTs

- CBC

GS

2 days Rest

Medical Officer
Saidu Group of Teaching
Hospital Swat

-FACE VALUE RUPEES 10/-

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SAIDU GROUP OF TEACHING HOSPITALS

SAIDU SHARIF SWAT

Ph. 0946-9240126-27 Email: mssthsawat@yahoo.com

CASUALTY/TRAUMA UNIT

Name: Harman Ali S/D/W: _____

Gender: _____ Age: _____ Address: _____

Yearly No: 21021 ES Department: _____ Date: 02 SEP 2021

Complaints:

fever & chills/rigors
Sore Throat
SOB.

Rx

K/C of HTNT - 2odp

Suspected Covid

Physical Examination:

SpO₂ = 93% RA
B/P = 160/100.

Tab Cefixet 400mg
QID → 5 2/1/1 ①

Tab MNTK 10mg
QID → ① 2/1/1 ①

Tab Azomax 500mg
QID → ① 2/1/1 ①

Investigations:

- CXR
CBC
CRP.

✓ Tab Delta Lotril
QID → ① ← 3 + 3.

Provisional Diagnosis:

Cap Risek 400mg
QID → ① - 2/1/1 2/1/1 ①

Follow up: _____ Doctor Name: _____ Signature: [Signature]



SAIDU GROUP OF TEACHING HOSPITALS

SAIDU SHARIF SWAT

Ph. 0946-9240126-27 Email: mssthsawat@yahoo.com

OUTPATIENT DEPARTMENT (OPD)

Name: (Handwritten Name) S/D/W: _____

Gender: M Age: 48 Address: Shagga

Yearly No: 36334 Department: _____ Date: 03 NOV 2021

Complaints:

APR → 3 days

Rx Ossank = 98/120
Tredip 6mg 2x/d

Physical Examination:

BP = 165/100 mm
T = 102 F

Rx:-

TS 600 2500

W3 - 1+1

7L Malgo 80/480

W3 - 1+1

7L Calc of

W3 - 1+1+1

Investigations:

FBC
ALT
NSI

(Handwritten mark)

FBC 30 W 3
CXR (PA)

Provisional Diagnosis:

(Handwritten diagnosis)

Follow up: _____ Doctor Name: _____ Signature: (Handwritten Signature)



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Amreek Clinical Laboratory

Prof:Dr. Amreek Lal

M.B.B.S.,D.C.Pathology
M-Phil (Haematology)

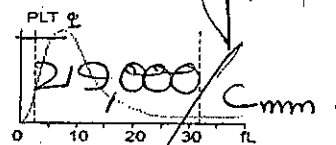
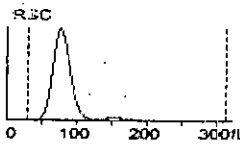
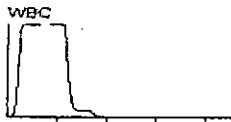
First Name: HAZRAT ALI
Last Name:
Gender: Male
Diagnosis:

Sample Type:
Department:
Med Rec. No.:1008

Sample ID: 5109
Run Time: 2021/11/06 12:50
Age: 48 Year

| Parameter | Result | Ref. Range | Unit | Parameter | Result | Ref. Range | Unit |
|-----------|--------|------------|---------------------|-----------|--------|-------------|---------------------|
| 1 WBC | 6.65 | 4.00-11.00 | 10 ³ /uL | 16MCH | 28.3 | 27.0-32.0 | pg |
| 2 Neu% | 59.2 | 40.0-75.0 | % | 17MCHC | 35.5 | 30.0-35.0 | g/dL |
| 3 Lym% | 31.4 | 20.0-50.0 | % | 18RDW-CV | 12.3 | 11.0-16.0 | % |
| 4 Mon% | 7.7 | 3.0-10.0 | % | 19RDW-SD | 40.0 | 35.0-56.0 | fL |
| 5 Eos% | 1.2 | 0.4-5.0 | % | 20PLT | 219 | 150-450 | 10 ³ /uL |
| 6 Bas% | 0.5 | 0.0-1.0 | % | 21MPV | 7.9 | 6.5-12.0 | fL |
| 7 Neu# | 3.94 | 2.00-7.00 | 10 ³ /uL | 22PDW | 9.1 | 9.0-17.0 | fL |
| 8 Lym# | 2.09 | 0.80-40.00 | 10 ³ /uL | 23PCT | 0.173 | 0.108-0.282 | % |
| 9 Mon# | 0.51 | 0.12-1.20 | 10 ³ /uL | | | | |
| 10 Eos# | 0.08 | 0.02-0.50 | 10 ³ /uL | | | | |
| 11 Bas# | 0.03 | 0.00-0.10 | 10 ³ /uL | | | | |
| 12 RBC | 5.11 | 4.30-6.00 | 10 ⁶ /uL | | | | |
| 13 HGB | 14.5 | 13.0-17.0 | g/dL | | | | |
| 14 HCT | 40.8 | 40.0-50.0 | % | | | | |
| 15 MCV | 79.9 | 76.0-96.0 | fL | | | | |

TLC = 6650/cmm
Hb = 14.5 gm/dL
PLT = 219,000/cmm



Submitter:
Sampling Time: 2021/11/06 12:50
Report Time: 2021/11/06 12:52

Operator: admin
Delivery Time: 2021/11/06 12:50
Remarks:

Approver:
Validated Time:

*The Report is responsible for this sample only. If you have any questions, please contact us in 24 hours.

Opinion: MP NOT SEEN. ESR _____ mm/1st hr

Prof:Dr. Amreek Lal

This report is not meant for any sort of medico-legal purposes.

Main Lab: Opp. Saidu Police Station Saidu Sharif Swat. Ph: 0946-722225 Cell: 0347-0892560
Collection Point: Opp. Central Hospital Saidu Sharif Swat. Cell:0347-9442400 E-mail: acls69@yahoo.com
Opp: THQ Hospital Khwazakhela Swat. Cell: 0347-8934159 | Opp: DHQ Hospital Daggar Buner. Cell: 0344-5704801



DEPARTMENT OF PATHOLOGY
SAIDU TEACHING HOSPITAL, SWAT

PATIENT NAME: [Signature] Age: _____ Sex: _____
DEPARTMENT: _____
INVESTIGATION REQUIRED: _____
LAB ID: _____ Date: _____

SEROLOGY

RA Factor: _____
ASO Titer: _____
Toxoplasma: _____
Blood Group: _____
Rh Factor: _____
Pregnancy: _____
Anti HCV (Screening): _____
Hbs Ag (Screening): _____
Syphilis (Screening): _____
H. Pylori (Screening): _____
HIV (Aids) (Screening): _____
TB ICF (Screening): _____
Dengue Antibodies IgM: _____
IgG: _____
Typhoid IgM: _____
IgG: _____

WIDAL TEST

| Dilution | 1/20 | 1/40 | 1/80 | 1/160 | 1/320 |
|----------|------|------|------|-------|-------|
| TO | | | | | |
| DU | | | | | |
| AH | | | | | |
| BU | | | | | |

BRUCELLA TEST

| Dilution | 1/20 | 1/40 | 1/80 | 1/160 | 1/320 |
|------------|------|------|------|-------|-------|
| Abortus | | | | | |
| Mellinitis | | | | | |

D-31 - Neg - DMC

NOTE: Please correlate with clinical findings.
This report is not meant for any sort of medico-legal purposes.

PROF. DR. IMRAN UD DIN (MBBS, M-Phil (Hematology))
PROF. DR. AMREK LAL (MBBS, DC Path, M-Phil (Hematology))
Associate Prof. DR. IMTIAZ AHMAD (MBBS, M-Phil (Microbiology))
Assistant Prof. DR. FAZAL HANAN (MBBS, M-Phil (Microbiology))
Assistant Prof. TABASSUM IMRAN (MBBS, M-Phil (Microbiology))
Assistant Prof. MUSHTAQ AHMAD (MBBS, M-Phil (Histopathology))
Assistant Prof. WASIM KHAN (MBBS, M-Phil (Histopathology))

SHAHID BOOK BINDING & STATIONARY MART

Bazar Saidu Sharif, Swat
Cell: 0342-9405564, 0333-9493166

Medical No 2

Rs. 10

No.

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO

DATE

No.

Rs. 10

OUT-PATIENTS DEPARTMENT

NAME

Dr. O.P.

YEARLY NO

31231

DATE

27 SEP 2021

DISEASE

Headache

C.B.A. Wound

↓ sleep

*BY 140
80*

① Tab. Xanax 0.5 mg

W/O → 10 → 10

② Tab. Bonflex-P

0.5 (5) → 10 → 10

FACE VALUE RUPEES 10



**DEPARTMENT OF PATHOLOGY
SAIDU TEACHING HOSPITAL, SWAT**

PATIENT NAME: Hazrat Al ABC: M
 DEPARTMENT: _____
 INVESTIGATION REQUIRED: Urea & Creat
 LAB ID: _____ Date: 13/09/2021

| Test | Result | Unit | Ref. Range | Test | Result | Unit |
|--------------------|------------|-------|-----------------------|---------------------|--------|--------|
| Glucose Fasting | | mg/dl | 55-115 | Cholesterol | | mg/dl |
| Glucose Random | | mg/dl | 70-170 | Triglyceride | | mg/dl |
| Bilirubin Total | | mg/dl | 0.5-1.0 | H-D-L | | mg/dl |
| Bilirubin Direct | | mg/dl | 0.25 | L-D-L | | mg/dl |
| Bilirubin Indirect | | mg/dl | 0.75 | ELECTROLYTES | | |
| ALT (SGPT) | | mg/dl | Upto 40 | Sodium | | mmol/L |
| ALP Phosphatase | | mg/dl | A:80-258 C:80-127 | Potassium | | mmol/L |
| Uric Acid | | mg/dl | M:0-6.7 F:Upto 5.7 | Chloride | | mmol/L |
| Urea | <u>28</u> | mg/dl | 10-50 | Ionized Calcium | | mmol/L |
| S. Creatinine | <u>1.1</u> | mg/dl | 0.5-1.3 | | | |
| S. Calcium | | mg/dl | 8.1-10.8 | | | |
| S. Amylase | | U/L | 24-98 | | | |

URINE ANALYSIS

| Colour | Reaction (pH) |
|--------------------------------|---------------|
| Albumin | Sugar |
| Bile | Urobilinogen |
| MICROSCOPIC EXAMINATION | |
| Pus Cells | /HPF RBC |
| Cast | /HPF Crystals |

NOTE: Please correlate with clinical findings.
 This report is not meant for any sort of medico-legal purposes.

PROF. DR. AMREEK LAL MBBS, DC Path, M-Phil (Hematology)
 Associate Prop: DR. IMTIAZ AHMAD MBBS, M-Phil (Microbiology)
 Assistant Prop: DR. WASIM KHAN MBBS, M-Phil (Histopathology)
 Assistant Prop: DR. FAZAL HANAN MBBS, M-Phil (Microbiology)
 Assistant Prop: DR. TABASSUM IMRAN MBBS, M-Phil (Microbiology)

SHAHID BOOK BINDING & STATIONARY MART
 Bazar, Saidu Shari, Swat
 Cell: 0342-9405564, 0333-9493166



Swat Diagnostic Centre



Main Saidu Road, Opp: Central Hospital, Saidu Sharif, Swat
Tel: 0946-711919, CSR: 0337-7191119
www.swatdiagnosticcentre.com



Page 1 of 1

| | | | |
|----------------|---------------------------------|--------------|-------------------|
| Patient Name : | HAZRAT ALI | Age / Sex : | 48 Years / Male |
| Lab No : | T218390 (Patient ID: 2021-6995) | Reg. Date : | 02-09-21 03:00 PM |
| Panel : | SWAT DIAGNOSTIC CENTRE | Consultant : | SGTH |

Chemical Parameters

| Test Name | Result | Unit | Reference Range |
|--------------------|--------|------|---|
| CRP (Quantitative) | 1.12 | mg/L | Adults : < 6 Children (>4 days): < 10 Newborn (upto 3 days): < 15 |

Dr. Muhammad Ishtiaq Khattak
MBBS, MCPS, DMRD
Chief Radiologist
Saidu Teaching Hospital, Swat

Dr. Inam Ullah Khan
MBBS, MPH (UK), Msc (UK)
Diploma Ultrasound (Canada)
Member British Medical Ultrasound
Member American Institute of Ultrasound

Dr. Muhammad Asif
MBBS, M.Phil (Chem.Path)
FCPS. (Histopathology)
Assistant Professor, Pathology
Saidu Medical College, Swat.

Dr. Syeda Madiha Ali
MBBS, MCPS Radiology
Certificate Breast Imaging, USA
Ex PGR Alnoor Diagnostic, Lahore

Dr. Muhammad Ishtiaq Khattak
MBBS, MCPS, DMRD
Chief Radiologist
Saidu Teaching Hospital, Swat
Consultant Radiologist

Dr. Muhammad Asif
MBBS, M.Phil (Chem.Path)
FCPS. (Histopathology)
Assistant Professor Pathology
Saidu Medical College Swat
Consultant Histopathologist

Dr. Inam Ullah Khan
MBBS, DCH, MPH (UK)
MSc (UK), Diploma Ultrasound (Canada)
Member British Medical Ultrasound Society
Member American Institute of Ultrasound In Medicine
Consultant Sonologist | Children Specialist

Prof. Dr. Khurshid Ahmad
MBBS, MCPS (Family Medicine)
DHPM, GPH (Australia)
Certificate Health Care (USA)
Family Physician

Dr. Syeda Madiha Ali
MBBS, MCPS Radiology
Certificate Breast Imaging
American College of Radiology, Newyork
Consultant Interventional Radiologist

Dr. Sajid Khan
BDS, RDS
M.Phil (Biochemistry) contd.

Dr. Haseeb Inam Khan
MBBS, RMP, Diploma Ultrasound
MO Nawaz Sharif Kidney Hospital Swat

Dr. Mohsin Sami Khan
MBBS, MCPS (Family Medicine)
DFM, MPH
Family Physician

The referring physician may contact reporting radiologist, cardiologist & pathologist for detailed discussion. Not valid for cou



Vety Research & Disease Investigation Center, Balogram, Swat.

Ph/Fax. 0946-9240259; GPO, Saidu Sharif, Swat P.O. Box# -3, Email: rdswat.ldr@sp.gov.pk; sro.vrs@gmail.com; Website: www.ldr.kndata.gov.pk;
Facebook Page: <https://www.facebook.com/vrdicswat/>; Twitter Account: <https://twitter.com/vrdicswat>



22

ORDER [REMOVAL FROM SERVICES]

Whereas Mr. Hazrat Ali while appointed and working as Naib Qasid (BPS-03) was proved guilty of misconduct [under Rule 3(b)] remaining willfully absent from Govt duty [w.e.f. 01 Sep, 2021 to 20 Oct, 2021] without any legal approval from the competent authority;

Whereas a Show Cause Notice [under Rule 5(a)] has been served to the accused vide this office Notice No. RD/VR&DIC/Sw/Estt/PF/N.Gzt/(25)/2017/4065-69 Dated. Oct 29, 2021 duly received by him on the last day he attended the office, but in spite to make legal reply, the accused neither responded justifying his position within the stipulated period of time [under Rule 14(4)(b)] nor attended the office thereafter for a single day;

Whereas in response to the above referred show cause notice, the accused once again disappeared / remained absent from the official duty without any approval of leave or even intimation to this office [w.e.f. Oct 01, 2021 till date];

Whereas an inquiry was conducted vide this office order No. RD/VR&DIC/Sw/Estt/(332)/2017/3227-31 Dated. May 17, 2021] against him [under Rule-5 of the E&D Rules 2011] inconsequence to his long absentia from the official duty [w.e.f. 22 Mar, 2021 to 17 May, 2021 consecutively] with ultimate punishment with minor penalty vide this office order No. RD/VR&DIC/Sw/Estt/(332)/2017/3356-62 Dated. July 01, 2021] considering his appeal on compassionate/humanitarian ground this before;

Whereas in spite of his undertaking - repentance on stamp paper regarding repentance and non-repetition of the habitual absenteeism and acting upon the Govt regulations in force;

Whereas the undersigned is satisfied [under Rule-14(4)(b)] that the accused has committed acts/omissions specified in Rule-3 of the Rules ibid;

Whereas the accused has been in practice since his induction in to the government services of remaining absent from Govt duty; and having sufficient proofs and ground for terminating his services and having been proved against him; and

Whereas I, Dr. S. Rahimullah Shah, Regional Director/PRO, Vety Research & Disease Investigation Center, Balogram, Swat in the capacity of Competent Authority has been satisfied with and exercise the powers to impose upon Mr. Hazrat Ali, Naib Qasid (BPS-03), VRDIC, Balogram, Swat major penalty of **Removal from Services** [under the Rule 4(b)(iii) of E&D Rules 2011] on account of his misconduct in best Govt and public interest.

Sd/-

(Dr. S. Rahimullah Shah)
DRM, M. Off (SRO)
Regional Director / PRO

No. RD/VR&DIC/Sw/Estt/PF/N.Gzt/(25)/2017/4119-23

Dated. Nov 15, 2021

Copy of the above is forwarded for information and necessary action to the;

1. Director General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar w/r to our telephonic discussion in this regard on Dated. Oct 29, 2021 please.
2. Dr. H. Nabi (SRO), Dr. Hazrat Salman Siddique & Dr. Shakirullah Khan (ROs), Personal Hearing Committee, Vety Research & Disease Investigation Center, Balogram, Swat, with reference to their report [No. VRDIC/Sw/PF/NG/(25)/2017/4113, Dated. Nov 12, 2021].
3. Cashier, Vety Research & Disease Investigation Center, Balogram, Swat for due necessary action.
4. Mr. Hazrat Ali, (Ex. Niab Qasid)/Official Concerned, Vety Research & Disease Investigation Center, Balogram, Swat.
5. File No. 332-33/2017 for record please.

(Dr. S. Rahimullah Shah)
DRM, M. Off (SRO)
Regional Director / PRO
15/11/2021

عنوان! ہمدردانہ آپیل بنام ڈائریکشن صاحب
برائے رجوعہ بحالی تہ مجیدہ خاتب قاصد
جناب عالی!

مودبانہ گزارش ہے کہ میں بلورنگ لائوسٹاک
ڈی ایچ جی ایچ میں بطور نائب قاصد اپنی خدمات انجام
دے رہا ہوں۔ جناب عالی اس سے پہلے بھی میں بیمار تھا
اور میں نے اپنے بورڈ میڈیکل کاغذات مٹین میں
جمع کرائے تھے جس کو بورڈ میڈیکل بورڈ سے لقمہ لقمہ
لیے سپروٹینگ ہسپتال MS کے پاس آدساں کیا گیا
جناب عالی PRO صاحب کے طرف سے مجھے بھی لیٹر ملا
کہ آپ کی میڈیکل رپورٹس کی لقمہ لقمہ سرکاری
ہسپتال سے کروا رہے ہیں۔ میں نے کیا ہی جان لیا آپ
صاحبان کو اختیار ہے میرے میڈیکل رپورٹس بالکل
اصلی اور اورجنل ہے۔ جناب عالی سرکاری ہسپتال
میں MS صاحب نے مجھے انکوائری کے لیے خبرایا
میڈیکل بورڈ کے سامنے میں پیشی ہوا اور میں
نے میڈیکل بورڈ والوں سے کیا کہ آپ صاحبان
جو انکوائری کر رہے ہیں MS صاحب کے لقمہ لقمہ

کے بغیر مجھے ہسپتال سے سزا دی گئی ہے لو آئیوں نے
 حیرت کا اظہار کیا کہ یہ سب کچھ ہمارے
 پاس آپ کے میڈیکل رپورٹس کے لئے
 لئے کیوں ارسال کیے جناب عالی ہسپتال
 بھی میرے ساتھ رخصت ہیں اور
 کیونکہ MS صاحب کے لئے سزا اور
 انکو الٹری کے لئے مجھے سزا دینے کو
 قانون تھا۔ لیکن ہسپتال میں میڈیکل
 بورڈ نے میرے میڈیکل رپورٹس کا
 فیصلہ بھی نہیں کیا تھا اور جتنا پرو
 کو مجھے سزا دینے کی جلدی تھی۔
 آپ صاحبان چیک کر سکتے ہیں کہ ہسپتال
 کی انکو الٹری کیوں ہوئی ہے اور مجھے سزا
 سزا دی گئی ہے۔ جناب عالی یہ میں
 ہسپتال سے سزا کی بات کر رہا ہوں چکا میں نے آپ
 صاحبان کو

میں نے آپ کو ایسا کیا تھا۔ جناب عالی وہ سزا بھی مجھے ہے انصافی سے دی گئی تھی کیونکہ میٹرنگل بورڈ نے فیصلہ بھی نہیں کیا تھا کہ میٹرنگل بورڈ رٹھی آگئی ہے یا نقلی سکنز ^{مناب} PRO صاحب نے ان صاحبان سے بدلے مجھے سزا سنایا تھا۔

جناب عالی میں اب آپ صاحبان سے بھرپور دانہ آپیل کر رہا ہوں کہ میرے چھوٹے چھوٹے بچے ہیں۔ میری چھوٹی بیٹی دل کی مرلینہ ہے۔ والد صاحب بھی فالج کا مریض ہے۔ ماں بھی دل کی مرلینہ ہے میں سیرج انفارمیشن برداشت کرونگا۔ میرے بچے سکول میں پڑھتے ہیں۔ میں اُنکا کیا کرونگا۔

جناب عالی میں بیمار تھا اور میرے کاغذات میں آپ صاحبان کو ارسال کر رہا ہوں آپ صاحبان سے اس کی لقمہ لقمہ سرکاری ہسپتال سے کروا سکتے ہیں جناب عالی مجھے بے بتاریخ 10/10/2021 کو ایک وضاحت جناب ڈاکٹر سلیمان صاحب نے طلب کیا کہ آپ اپنی ڈیوٹی سے غائب نہ رہیں تو جناب عالی

یہ مضمون عالمی سطح پر پھیلتے ہوئے
ہو گیا ہے۔ اس کے نتیجے میں
دنیا بھر میں لوگوں کو
خطرہ لاحق ہے۔ اس کے
نتیجے میں دنیا بھر میں
لوگوں کو خطرہ لاحق ہے۔

اس کے نتیجے میں
دنیا بھر میں لوگوں کو
خطرہ لاحق ہے۔ اس کے
نتیجے میں دنیا بھر میں
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نتیجے میں دنیا بھر میں
لوگوں کو خطرہ لاحق ہے۔

میں اُس کی دعائیاں استعمال کر رہا تھا میرا بچا بھی
 تھا۔ پاؤں میں بھی درد تھا۔ جناب عالی میرا
 بلڈ پریشر بھی بڑھ جاتا ہے اور میں اُس

کی دعائیاں استعمال کر رہا ہوں۔ جناب عالی

صبا میں نے اپنی بیماری کا وضاحت ڈاکٹر سلمان

کویشی کیا تو پھر جناب PRO صابا نے

مجھے بتا دیا 29/10/21 کو شوکارا لوشی

جاری کیا کہ میں آپ کی وضاحت سے مطمئن

ہوں ہوں آپ کی آدین کے اندر میرے

شوکارا لوشی کا جواب دے دیں جناب

عالی میں اُسی دوران پھر بیمار ہو گیا میرے

کاغذات میں آپ صابان کی حیرت

میں ارسال کر دیا ہوں۔ میں نے نیوروجن

سے داہم کیا اُس نے کیا کہ آپ پالی

بلڈ پریشر کے مریض ہو۔ میں نے اُس سے

کیا کہ میرے سر میں درد ہوتا ہے اور

ہم کو دیا ہے کوئی جعلی آرڈر وغیرہ دیا ہے
 کوئی میر وغیرہ استعمال کیا ہے۔ یا حضرت علی
 کے زہر بھادا کوئی سیب غیر قالونی کا
 کے لیے لیا ہے اور حضرت علی کے زہر
 ہے تو پھر میں زہر دار رہو تو پھر
 حکومت جو بنا دیں میں قبول کرونگا
 لیکن اس انگوٹھی میں ہے سب الزامات
 کے جواب دیئے اور توئی ثبوت نہ پیش
 کر سکا۔ جناب عالی آپ صاحبان سے میں آخر
 میں پھر منیت سجاقت کر دیا ہوں کہ میں ایک
 غریب ملازم ہوں آپ صاحبان کا تقریباً مینہ
 دو مینہ باقی ہو گا ریٹائرمنٹ کے لیے جناب
 آپ صاحبان آخر میں اس غریب کی دعا کے
 کے جائیں میں زندگی پھر دعائیں دوں گا۔
 جناب عالی آپ صاحبان نے دوران سفر و سیر

میرے اُمیر نے اب صاحبانِ صحیحہ اپنے عہد کے در
 حال کرنے کا حکم صادر فرمایا۔ جناب عالی جناب
 صاحب نے صحیحہ بتادخ 15/11/21 کو اپنے عہد کے سے
 کیا ہے۔ جناب عالی نے میرے گھر پر کوئی غیر حاکم
 کا نوٹس آیا ہے۔ نہ کوئی اخباری اشتیاء بکا
 ہے۔ صرف اس کے لئے میرے آپ نے حلف نامہ جمع
 جناب عالی اگر حلف نامہ میں نے جمع کیا ہے تو میں
 لوجان بوجھ کر کوئی غلطی نہیں کی ہے بلکہ بوجہ بیماری
 میں آفس نہ آسکا میرے پاس میڈیکل موجود ہے
 جناب عالی میں ایک غریب ملازم یوں جو در رسم کھائیں
 میرے چھوٹے چھوٹے بچوں اور بیمار والدین اور بیٹی پر
 رسم کھائیں میں زندگی بھر آپ صاحبان کو دعائیں
 دوں گا۔ جناب عالی میرے پاس نہ اپنے علاج کے لئے
 سے ہے اور نہ بیمار بیٹی اور والدین کے علاج کے
 لئے سے ہے۔ مجھے سکول بھی جاتے ہیں۔ میں اللہ باری
 کو حاضر و ناظر جان کر رسم کھاتا ہوں کہ میں بچوں کو
 سکول جانے کے سے صبح بھی نہیں دے سکتا۔ وہ
 بچارے روتے ہیں۔ جناب عالی میری بیٹی دل کی مرہنہ
 ہے اس کے علاج کے لئے بھی خرچہ نہیں ہے۔ جب اللہ تعالیٰ

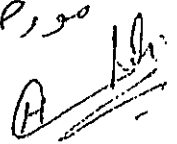
کے سین چھو ہیں پھیلا سکتا تو آپ صاحبان کے سیا چھو یا رونقا،
جناب عالی میں اپنی بیٹی اور والدین کے علاج کے سرکاری کاغذات
آپ صاحبان کو پیش کر سکتا ہوں کہ آپ صاحبان کو
پہنیں آئے۔ جناب عالی میرے معاشی حالات ٹھیک
خراب ہے۔ چھو پر رسم عا میں۔ میں نے جو چھو کیا ہے
میں بیمار تھا۔ میں نے جان بوجھ کر نہیں کیا ہے۔

جناب عالی آپ اپنے عزیز پر رہے یا نہ رہے میں
زندگی بھی آپکا احسان نہیں بھولونگا۔ بلکہ تاحیات
آپ صاحبان کو دعائیں دوں گا۔ اللہ تعالیٰ کا فرکو
معاف کر سکتا ہے۔ تو کیا آپ صاحبان مجھے مُعاف
ہیں کر سکتے۔ جناب عالی میں آپ صاحبان سے مُعافی
چاہتا ہوں آئندہ سخت بیماری میں بھی اپنی ڈیوٹی
انجام دوں گا جب تک اسپر خورد نہ کیے کہ چھو کر لوں۔ میں
چھو نہیں کروں گا۔ والسلام۔

حضرت علی ولہ بخت عکال

سابقہ نائب قاصد
VR&DIR بلوگرام سوات

مورخہ 13/12/21



لوٹل صفحات بغیر میٹرنگل کے (16) عدد
میٹرنگل رپورٹس اور جینل ساؤتھ میں منسلک ہیں



LI

**RATE GENERAL (RESEARCH)
& DAIRY DEVELOPMENT DEPARTMENT
PESHAWAR, PAKHTUNKHWA, PESHAWAR**



29

Bacha Khan Chowk Khyber Pakhtunkhwa Peshawar
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091-9210220

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Twitter.com/livestockreskp
dg.ldr@kp.gov.pk

No. DG(Res)/L&DD/Est-II(91)/2019/ 58

Dated Peshawar the 04/01/2022

To

Mr. Hazrat Ali,
Ex-Naib Qasid
Veterinary Research & Disease Investigation Center,
Balogram Swat,
Muhalla Shagai, Saidu Sharif, Tehsil & District, Swat.

Subject: APPEAL

Reference to your appeal dated 13.12.2021, addressed to Director General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar (the Appellate Authority) on the subject cited above.

Taking into account your habitual absenting from duties and periodic warnings issued from time to time, you failed to mend your ways/ attitude. The medical chits on successive accounts of one or the other problem (of dubious nature) speaks volume of your lack of interest in official duties and inefficiency. The gross negligence in duties and violation of the conduct rules required appropriate action under E&D Rules 2011. The action taken by PRO/RD, Veterinary Research & Disease Investigation Center Balogram, Swat for terminating your service is according to the E&D Rules and in line with the terms and conditions of the appointment.

Based upon the above facts, your appeal does not hold any grounds and hence rejected.

Director General
(Research)


No. DG(Res)/L&DD/Est-II(91)/2019/

Dated Peshawar the ___/01/2022

Copy of the above is forwarded for information to:-

1. The Director, Veterinary Research Institute, Khyber Pakhtunkhwa, Peshawar.
2. The Principal Research Officer/ Regional Director, Veterinary Research & Disease Investigation Center, Balogram Swat.

Director General
(Research)

| | | |
|----------------------------|--|---|
| بار کونسل نمبر: BC-11-2418 |   | سرٹیفکٹ نمبر: 93507 |
| بار ایسوسی ایشن نمبر: | |  |
| رابطہ نمبر: 03468333750 | ڈسٹرکٹ بار ایسوسی ایشن سوات | |

بعدالت جناب: ضیبر پنجتہ پنخوا سہرویس ٹرینول پشاور

| | |
|-------------------------------------|------------------|
| منجانب: ایبلانٹ | دعویٰ اور خواست: |
| صفحت علی بنام | علت نمبر: |
| ڈی آر ایچ ٹرینول لائیو سٹاکس و ٹریڈ | مورخہ: |
| | جرم: |
| | تھانہ: |

باعت حیرانگہ

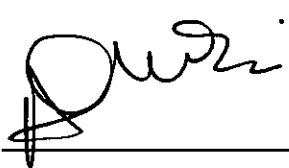
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام **مُل لہہ** کیلئے **اشتراقیہ ایڈووکیٹس بالی کورٹ** کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی پاجزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سندر ہے

ظاہر

ایبلانٹ لائیو سٹاکس
صفحت علی

مقام **پشاور** ضیبر پنجتہ پنخوا کے لئے منظور ہے۔



ایڈوکیٹ دستخط:

12/02/2022

المرقوم: