

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

SERVICE APPEAL NO. 1607/2019

Date of institution ... 29.11.2019
Date of judgment ... 05.12.2019

Dr. Adnan Khattak S/O Gul Nawaz Khattak
R/O House No. 402, Street-9, Sector E-6 Phase 7 Hayatabad
Peshawar. ... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary
Khyber Pakhtunkhwa Peshawar and three others respondents.
... (Respondents)

MR. ZARTAJ ANWAR, ADVOCATE ... For appellant.

Mr. HAMID FAROOQ DURRANI ... Chairman

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:- The
appellant is aggrieved of order dated 23.08.2016,
whereby he was awarded major penalty of removal from
service on account of absence from duty with effect from
01.01.2015 till date of passing of order. His
departmental appeal was also rejected on 11.10.2019.

2. Learned counsel for the appellant contended that the
appellant was initially granted study leave from

16.01.2012 to 31.12.2013. The leave was extended up to December 2014, while during his stay in Australia, the appellant met an accident and as a consequence was required to take complete bed rest for 52 weeks. Due to the accident, the appellant could not join his duty in time. However, he duly submitted reply to the show-cause notice on 19.05.2016, wherein his contention was explained. In view of learned counsel, the departmental proceedings were taken at the back of appellant thus he was not provided an opportunity to put forth his defence in respect of absence from duty. The impugned order dated 23.08.2016 was, therefore, not maintainable, it was added.

3. The available record suggests that after passing the impugned removal order against the appellant on 23.08.2016, he remained indolent till 07.08.2019 when the departmental appeal was submitted. The appeal was badly barred by time and was rejected as such on 11.10.2019.

4. It is an admitted fact that the appellant being an employee of Director General Health Services Khyber Pakhtunkhwa was allowed leave for pursuing study in Australia up to December 2014. Such leave was never extended. Documents pertaining to the medical record of

appellant suggests that on 08.12.2014, the appellant was prescribed travel restrictions up to 08.05.2015. On the other hand, the appellant submitted a reply to the show-cause notice on 30.05.2016 but did not make himself available for departmental proceedings thereafter.

5. In view of above noted facts, the rejection order pertaining to the departmental appeal of the appellant dated 11.10.2019 appears to be unexceptionable. Needless to note that in view of judgments reported as 2006 SCMR 453 and 2012 SCMR 195 the appeal in hand is also not competent. The same is, therefore, dismissed in limine. File be consigned to the record room.

ANNOUNCED
05.12.2019




(HAMID FAROOQ DURRANI)
CHAIRMAN

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1607/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/11/2019	<p>The appeal of Dr. Adnan Khattak presented today by Mr. Zartaj Anwar 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 29/11/19</p>
2-	02/12/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/12/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 1607/2019

Dr. Adnan Khattak S/O Gul Nawaz Khattak R/O House No
402, Street-9, Sector E-6 Phase 7 Hayatabad Peshawar.

(Appellant)

VERSUS

Government of KPK through Chief Secretary Khyber
Pakhtunkhwa, and Others,


(Respondents)

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1	Memo of Appeal and affidavit		1- 6
2	Copy of the appointment order dated 04.10.2007 is attached as annexure A	A	7- 14
3	Copy of the MPH Degree	B	15
4	Copy of the office order dated 05.12.2009, and 03.12.2011	C & D	16- 18
5	Copy of the NOC	E	19
6	Copy of the notification dated 10.12.2011	F	20
7	Copy of the notification dated 06.01.2015	G	21
8	Copy of the medical report / MRI report and Medical Advices	H	22-26
9	Copy of the medical prescription	I	27-29
10	Copy of the application dated 23.04.2015 and letter dated 01.06.2015	J & K	30-31
11	Copy of the show cause notice dated 19.05.2016 and reply dated 30.05.2016	L	32-33 ^A
12	Copy of the removal order dated 23.08.2016	M	34
13	Copy of the letter dated 23.01.2017	N	35
14	Copies of the departmental appeal , rejection letter dated 11.10.2019 and receipt dated 21.11.2019	O	36-39
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Appellant

Through


LARTAJ ANWAR
Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1607/2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1693

Date 29-11-2019

Dr. Adnan Khattak S/O Gul Nawaz Khattak R/O House No
402, Street-9, Sector E-6 Phase 7 Hayatabad Peshawar.

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. Secretary health, Government of Khyber Pakhtunkhwa Peshawar.
3. Director General Health, Khyber Pakhtunkhwa, Peshawar.
4. Additional Director General (HRM) Directorate General Health Service Khyber Pakhtunkhwa Peshawar.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the Order Dated 23.08.2016, whereby the appellant was awarded major penalty of Removal from service, against which the Departmental Appeal dated 08.08.2019, of the appellant has also been rejected on 11.10.2019, communicated on 21.11.2019

Filed to-day

Registrar

29/11/19

Prayer in Appeal: -

On acceptance of this appeal the impugned orders dated 23.08.2016 may please be set-aside and the appellant may please be reinstated in service with all back benefits of service.

Respectfully Submitted:

1. That the appellant was initially appointed as Dental Surgeon (BPS-17) on the recommendation of Public Service Commission on 04.10.2007. (Copy of the appointment order dated 04.10.2007 is attached as annexure A).

2. That Ever since his appointment the appellant had performed his duties as assigned to him with great zeal and devotion and there was no complaint whatsoever regarding his performance.
3. That after rendering two years service as Dental Surgeon the appellant also improved his qualification by obtaining MPH degree from Ghandhara University Peshawar in 2009-2010. *(Copy of the MPH Degree is attached as annexure B).*
4. That the appellant was inducted in the management Cadre and posted as Assistant Director in the DGHS office vide office order dated 05.12.2009, the appellant also got two months training of Doctors of management cadre for promotion on 03.12.2011 *(Copy of the office order dated 05.12.2009, and 03.12.2011 is attached as annexure C & D).*
5. That while serving as Assistant Director in DGHS Office, the appellant was selected for a training Course of Master of Public Health under the Australian Development Scholarship Award 2012, commencing from 16.01.2012 to 31.12.2013 in Australia with condition that all the expenses will be borne by the donor agency.
6. That the appellant applied through proper channel to the high ups for the grant of NOC to proceed abroad for further study under the Australian development Scholarship award 2012, upon which the NOC was granted to the appellant by the respondent department on 19.07.2011. *(Copy of the NOC is attached as annexure E).*
7. That the terms and condition for the course were settled and notified vide notification dated 10.12.2011, in which leave was sanctioned to the appellant from Jan 2012 to Dec 2013. *(Copy of the notification dated 10.12.2011 is attached as annexure F)*
8. That thereafter the appellant was applied for extra Ordinary leave , upon which one year leave (without pay) was granted to the appellant from 01.01.2014 to 31.12.2014 vide notification dated 06.01.2015. *(Copy of the notification dated 06.01.2015 is attached as annexure G)*

9. That unfortunately in December 2014 the appellant was seriously injured in a road traffic accident, due to which serious injury to the backbone and slip vertebral discs were diagnosed and the appellant was advised for complete bed rest and further advised for treatment under report, the appellant was on bed rest and forbidden from travelling initially for 06 months. *(Copy of the medical report / MRI report and Medical Advices attached as annexure H).*
10. That during the treatment of the appellant in the hospital, the wife of the appellant was also pregnant and was under treatment for gestational diabetes at a maternity hospital. *(Copy of the medical prescription is attached as annexure I)*
11. That the appellant was again applied for extension of extra ordinary leave through application dated 23.04.2015, which was not responded back to the appellant and later on got knowledge of it when it acquired by the appellant himself from the department as the same was refused by the respondent department vide letter dated 01.06.2015. *(Copy of the application dated 23.05.2015 and letter dated 01.06.2015 is attached as annexure J & K)*
12. That thereafter show cause notice was issued to the appellant on 19.05.2016, which was duly replied by the appellant on 30.05.2016, by rebutted all the so called allegation of the respondents and fully explained the current situation/health condition of the appellant, which was not considered nor proper course of proceeding was adopted by the respondents. *(Copy of the show cause notice dated 19.05.2016 and reply dated 30.05.2016 is attached as annexure L)*
13. That the respondent department without taking into consideration the submissions made by the appellant in reply to the show cause notice and also without conducting any fact finding inquiry, personal hearing issued/imposed the major penalty of removal from service upon the appellant vide order dated 23.08.2016. *(Copy of the removal order dated 23.08.2016 is attached as annexure M).*
14. That the removal order was sent on the wrong address i.e. House No 23 Street No 6 Sector C/1 Phase 5 Hayatabad

Peshawar instead of House No 134; Street No 6 Sector C/1 Phase 5 Hayatabad Peshawar, as the order was sent to the appellant on wrong address, which is evident from the letter dated 23.01.2017, (*Copy of the letter dated 23.01.2017 is attached as annexure N*).

15. That the appellant after come back to Pakistan inquire about the status of his job, the appellant was informed that he was removed from his service, upon which the appellant was submitted his departmental appeal on 08.08.2019, which was rejected on 11.10.2019, which was communicated to the appellant on 21.11.2019. (*Copies of the departmental appeal , rejection letter dated 11.10.2019 and receipt dated 21.11.2019 are attached as annexure O*)
16. That the penalty so imposed upon the appellant is illegal unlawful against the law and facts hence liable to be set aside inter alia on the following grounds:

Grounds of Appeal:

- A. That the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the law and constitution is badly violated.
- B. That while awarding the major penalty of removal from service to the appellant no proper procedure has been adopted, before removal from service no charge sheet was served upon the appellant, neither any enquiry was conducted nor the appellant was given any opportunity of Personal hearing before his removal from service thus the order impugned is liable to be set aside on this score alone.
- C. That the appellant never absented himself willfully but it was due to the prevailing situation that forced the appellant to stay in Australia. \
- D. That unfortunately in December 2014 the appellant was seriously injured in a road traffic accident, due to which serious injury to the backbone and slip vertebral discs

were diagnosed and the appellant was advised for complete bed rest and further advised for treatment under report, the appellant was on bed rest and forbidden from travelling initially for 06 months.

- E. That the respondent department did not follow the proper procedure under section 9 of the E & D Rules 2011 and did not publish any notice in the newspaper, According to section 9 of the E & D rules

“Notwithstanding anything to the contrary contained in these rules, in case of willful absence from duty by a Government servant for seven or more days, a notice shall be issued by the competent authority through registered acknowledgement on his home address directing him to resume duty within fifteen days of issuance of the notice. If the same is received back as undelivered or no response is received from the absentee within stipulated time, a notice shall be published in at least two leading newspapers directing him to resume duty within fifteen days of the publication of that notice, failing which an ex-parte decision shall be taken against the absentee. On expiry of the stipulated period given in the notice, major penalty of removal from service may be imposed upon such Government servant”

- F. That the appellant has committed no act or omission, which can be termed as misconduct, the penalty imposed is harsh and liable to set aside on this score alone.
- G. That the penalty imposed is too harsh has a long service career, the appellant is young and want to serve the department, albeit is illegally restrained from serving.
- H. That the appellant was not granted any opportunity of personal hearing.
- I. That the appellant is jobless since his dismissal from service.

J. That the appellant seeks the permission of this Honourable Tribunal to rely on additional grounds at the hearing of this appeal.

It is therefore prayed that on acceptance of this appeal the impugned orders dated 23.08.2016 may please be set-aside and the appellant may please be reinstated in service with all back benefits of service

Adnan Khattak
Appellant

Through

Zartaj Anwar
ZARTAJ ANWAR

Advocate Peshawar

&

Imran Khan
IMRAN KHAN

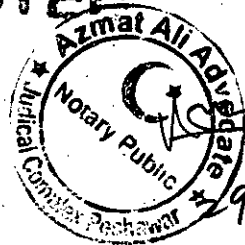
Advocate Peshawar

AFFIDAVIT

I, Dr. Adnan Khattak S/O Gul Nawaz Khattak R/O House No 402, Street-9, Sector E-6 Phase 7 Hayatabad Peshawar, do hereby solemnly affirm and declare that the contents of the above appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

Adnan Khattak
Deponent

ATTESTED



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APPROVED

HEALTH DEPARTMENT

Date: October 4, 2007

NOTIFICATION

NO. SP/HE/113/3/2007 On the recommendations of Public Service Commission, the competent authority is pleased to appoint of the following doctors as Dental Surgeon (BS-17) on regular basis.

S #	NAME OF DOCTOR WITH FATHER'S NAME/DOMICILE	FROM	TO	REMARKS
1	Dr. Atta-ur-Rahman S/O Attaullah Jan /Distt: Charsadda	1 st Appointment	At the disposal of EDO(H) NOWSHERA	Against the vacant post
2	Dr Tanveer Hussain s/o Yousaf Hussain Bangash Kurram Agency	1 st Appointment	At the Disposal of DHS FATA	Against the vacant post
3	Dr Zafar Ali Khan s/o Asghar Ali Khan Peshawar	1 st Appointment	At the Disposal of EDO (H) Kohat	Against the vacant post
4	Dr. Andaleeb Umar d/o Umar Mohammad Malakand	1 st Appointment	At the Disposal of EDO (H) Malakand	Against the vacant post
5	Dr. Sabahat Ullah Khan s/o Sakhi Ullah Khan Karim Di Khan	1 st Appointment	At the Disposal of EDO (H) DI Khan	Against the vacant post
6	Dr. Muhammad Umar Saeed s/o Saeed Ullah Jan DI Khan	1 st Appointment	At the Disposal of EDO (H) DI Khan	Against the vacant post
7	Dr Muhammad Ali Chughtai s/o Muhammad Aurenzeb Chughtai Peshawar	1 st Appointment	At the Disposal of EDO (H) Swabi	Against the vacant post
8	Dr Qaiser Khan s/o Muhammad Zareen Buner	1 st Appointment	D/S SGTH Swat	Against the vacant post
9	Dr Fahim Ullah s/o Abdur Rais Khan Karak	Serving Contract	At the Disposal of EDO (H) Hangu	Against the vacant post
10	Dr. Nida Murad D/O Murad Ali Khan/Peshawar	1 st Appointment	Dental Surgeon Govt.LRH, Peshawar	Against the vacant post

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ATTESTED

S #	NAME OF DOCTOR WITH FATHER'S NAME/DOMICILE	FROM	TO	REMARKS
11	Dr. Fouzia Tabassum D/O Mushtaq Hussain Shah/ Abbottabad	1 st Appointment	At the Disposal of EDO (H) Abbottabad ✓	Against the vacant post
12	Dr. Bushra Amin D/O Aminullah Jan Qazi/ Charsadda	1 st Appointment	Dental Surgeon Govt. LRH, Peshawar	Against the vacant post
13	Dr. Muhammad Ishaq Khan S/O Muhammad Ibrahim Khan/ Lakki Marwat	1 st Appointment	At the Disposal of EDO (H) Lakki Marwat	Against the vacant post
14	Dr. Mohibuddin S/O Fida Azizuddin /Chitral	1 st Appointment	At the Disposal of EDO (H) Chitral	Against the vacant post
15	Dr. Ali Ayub S/O S. Ayub Hussain Shah/ Hangu	1 st Appointment	At the Disposal of DHS FATA	Against the vacant post
16	Dr. Zubair Qayyum S/O Abdul Qayyum Mughal/ Abbottabad	1 st Appointment	At the Disposal of EDOH Mansehra	Against the vacant post
17	Dr. Ziaullah Khan S/O Nasrullah Khan, Peshawar	1 st Appointment	At the Disposal of EDO (H) Lower Dir	Against the vacant post
18	Dr. Israrullah Khan Dewar S/O H. Abdul Latif Dewar/ NW Agency Miranshah	Serving on contract basis at SHC, Mir Ali NW Agency since 10-05-2004	At the Disposal of EDO (H) Nowshera	Against the vacant post
19	Dr. Sadia Nisar Ahmad D/O Haji (Maj. R) Nisar Ahmad/ Nowshera	1 st Appointment	At the Disposal of EDO (H) Abbottabad ✓	Against the vacant post
20	Dr. Jamil Kifayatullah S/O Kifayatullah Amirzada / Lower Dir	1 st Appointment	At the Disposal of EDO (H) Dir Upper	Against the vacant post
21	Dr. Fahim uddin S/O Qazi Shafiuddin/ Nowshera	1 st Appointment	At the Disposal of EDO (H) Mansehra	Against the vacant post

Major Ahmad
 20/11/10

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ATTESTED

S #	NAME OF DOCTOR WITH FATHER'S NAME/DOMICILE	FROM	TO	REMARKS
22	Dr. Muhammad Ashfaq S/O Abdul Latif /Fr Bannu	1 st Appointment	At the Disposal of DHS FATA	Against the vacant post
23	Dr. Andaleeb Awan D/O Ghulam Muhammad Awan/ Peshawar, w/o Dr. Wasim Yar Khan	1 st Appointment	D/S HMC Peshawar	Against the vacant post
24	Dr. Muhammad Ayub Khan S/O Amnash Khan/ Buner	1 st Appointment	At the Disposal of EDO (H) Shangla	Against the vacant post
25	Dr. Farah Ambareen D/O Syed Mushtaq Ali/ Bannu	1 st Appointment	At the Disposal of EDO (H) Bannu	Against the vacant post
	Dr. Asma Anwar Bhatti D/O Muhammed Anwar Bhatti/ Abbottabad	1st Appointment	At the Disposal of EDO (H) Abbottabad	Against the vacant post
27	Dr. Asma Anwar Bhatti D/O Muhammed Anwar Bhatti/ Abbottabad	1 st Appointment	At the Disposal of EDO (H) Abbottabad ✓	Against the vacant post
28	Dr. Muhammad Asif S/O Abdul Qayyum Khan/ Peshawar	1 st Appointment	At the Disposal of EDO (H) Lower Dir	Against the vacant post
29	Dr. Muhammad Meesood Khan S/O Mumtaz Ali Khan/ Peshawar	1 st Appointment	At the Disposal of DHS FATA	Against the vacant post
30	Dr. Muhammad Naeem S/O Ahmad Jan/ Malakand	1 st Appointment	At the Disposal of EDO (H) Malakand	Against the vacant post
31	Dr. Adnan Khan S/O Malakzad/ Bannu	TMO AMC Abbottabad (Contract) since 24/5/06	TMO PGMi Peshawar	Against his original post
32	Dr. Iftikhar Akbar S/O Gul Akbar/ Mardan	1 st appointment	At the Disposal of EDO (H) Mardan	Against the vacant post
33	Dr. Muhammed Umar Shah S/O Zahir Shah / Orakzai Agency	1 st Appointment	At the Disposal of DHS FATA	Against the vacant post
34	Dr. Salma Noreen D/O Misal Khan/ Nowshera	1 st Appointment	At the Disposal of	Against the vacant post

ATTESTED

S #	NAME OF DOCTOR WITH FATHER'S NAME/DOMICILE	FROM	TO	REMARKS
			EDO (H) /Nowshera	
35	Dr. Abbas Salim Khan S/O Muhammad Salim Khan/ Malakand	1 st Appointment	At the Disposal of EDO (H) Upper Dir	Against the vacant post
36	Dr. Abdul Hameed S/O Abdul Majeed/ Peshawar	1 st Appointment	At the Disposal of DHS FATA for posting in FR Kohat	Against the vacant post
37	Dr. Fahad Nazir S/O Nazir Ahmad /Mohmand Agency	1 st Appointment	At the Disposal of DHS FATA.	Against the vacant post
38	Dr. Gul Paran D/O Arbab Tehsaen Ullah Khan/ Peshawar	1 st Appointment	At the Disposal of EDO (H) Peshawar	Against the vacant post
39	Dr. Adnan S/O Muhammad Zafran/ Mansehra	1 st Appointment	At the Disposal of EDO (H) Mansehra	Against the vacant post
40	Dr. Zia Ul Haq S/O Hamid ul Haq/ Peshawar	1 st Appointment	At the Disposal of EDO (H) Mansehra	Against the vacant post
41	Dr. Anwar Ali Khan S/O Raqeeb Khan/ Bannu	CH Sadda Kurram Agency since 18-07-1999	CH Sadda Kurram Agency	Against his original post
42	Dr. Khurshid Muhammad S/O Gul Muhammad/ Mohmand Agency	RHC Jamal Abad Charsadda	RHC Jamal Abad Charsadda	Against his original post

2. Their services shall be governed under the provision of NWFP Civil Servants Act 1973 read with Civil Servant (Amendment) Act 2005, APT Rules 1989 and other relevant laws and rules.
3. The serial order of this notification will not confer any right of seniority which will be determined by the Public Service Commission later on.
4. The officers are required to report for duty within 30 days of the issuance of this Notification failing which the appointment will stand automatically cancelled.

SECRETARY HEALTH

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~~ATTESTED~~

OFFICE OF THE DIRECTORATE GENERAL HEALTH SERVICES NWFP, PESHAWAR.No. 1261-1340 /ADDDated Peshawar the 06 /10/2007

Copy forwarded to the:-

1. M/S LRH/HMC, Peshawar.
2. M/S Saidu Group Teaching Hospitals, Swat.
3. Dean, PGM/HMC, Peshawar.
4. DHS FATA NWFP, Peshawar.
5. EDOs(H) Peshawar, Charsadda, Nowshera, Swabi, Lower Dir, Upper Dir, Chitral, Shangla, Abbottabad, Mansehra, Kohat, Bannu, Lakki Marwat, DIKhan, Hangu.
6. Accountant General NWFP, Peshawar.
7. District Accounts Officers, Charsadda, Nowshera, Swabi, Lower Dir, Upper Dir, Chitral, Shangla, Abbottabad, Mansehra, Kohat, Bannu, Lakki Marwat, DIKhan, Hangu & Swat.
8. Agency Accounts Officers Kurram Agency/North Waziristan Agency.

REGISTERED

1. Dr. Atta-ur-Rahman S/O Attaullah Jan
House No. 3-A Street No. No. 4,
Canal Town P/O University of Peshawar.
2. Dr. Fahim Ullah S/O Abdur Rais Khan
House No. 175 Street No. 6 Sector. K-6,
Phase-3 Hayatabad, Peshawar.
3. Dr. Qaiser Khan S/O Muhammad Zarin
Village Pirbal Tehsil Gadezia P/O Pirbaba,
District Buner.
4. Dr. Muhammad Ali Chughtai S/O Muhammad Aurangzeb Chughtai
Ali Mansoor House No. 1 Shah Street No Canal Town,
Gul Bahar No. 2, Peshawar.
5. Dr. Muhammad Umar S/O Saeedullah Jan
Hose NO. 79 Street No. 17 Block-D Pak: PWD Colony,
Habib Hair, Islamabad.
6. Dr. Sabahat Ullah Khan Tareen S/O Sakhi Ullah Khan Tareen
Block K-1 Street No. 06,
Phase-3 Hayatabad, Peshawar.
7. Dr. Andaleeb Umer S/O Umer Muhammad
House No. 77 Street No. 4 Sector H-4,
Phase-2 Hayatabad, Peshawar.
8. Dr. Tanweer Hussain Bangash S/O Yousaf Hussain Bangash
House No. 253 Street No. 7 Sector K-1,
Phase-3 Hayatabad Peshawar.

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~~ATTESTED~~



9. Dr. Zafar Ali Khan S/O Asghar Ali Khan
House No. 18 Street No. 4 Rahat Abad Colony,
Peshawar University Town Committee, Peshawar.
10. Dr. Abbas Saleem Khan S/O Muhamamad Saleem Khan
J-3/16 Phase-2 Hayatabad, Peshawar.
11. Dr. Saima Nasim D/O Misal Khan
House No. 10 Street No. 6 Phase-1,
Armour Colony Mardan Road Nowshera.
12. Dr. Iftikhar Akbar S/O Gul Akbar
C/O Said Amin Shopkeeper,
Village Par Hathiyar Tehsil Takht Bhai District Mardan.
13. Dr. Muhammad Umar Shah S/O Zahir Shah
Prosthetic Deptt: Punjab Dental Hospital,
Ravi Road Lahore.
14. Dr. Adnan Khan S/O Malak Zak
House No. 305 Street No. 6 Sector No. 2,
Phase-4 Hayatabad, Peshawar.
15. Dr. Muhammad Naeem S/O Ahmad Jan
Village Mulamssray Area & P/O Hero Shah,
Tehsil Dargai Malakand Agency.
16. Dr. Muhammad Masood Khan S/O Mumtaz Ali Khan
Gul Afshan Colony, Street No. 2 Near Civil Quarters Peshawar.
17. Dr. Muhammad Asif Khan S/O Abdul Qayyum Khan
House No. 96 Street No. 22-D4,
Phase-1 Hayatabad, Peshawar.
18. Dr. Asma Anwar Bhatti D/O Muhamamd Anwar Bhatti
Qureshi House Garden Street opposite Sethi Masjid,
Mansehra Road Supply Abbottabad.
19. Dr. Adnan Khattak S/O Gul Nawaz Khattak
House No. 134 Street No. 6 Sector C/1,
Phase-5 Hayatabad, Peshawar.
20. Dr. Farah Ambreen D/O Syed Mushfiq Ali
House No. 50 Street No. 1 Sector 2,
Phase-4 Hayatabad, Peshawar.
21. Dr. Muhammad Ayub Khan S/O Hamnash Khan
MO Hostel Room No. D225 Ayub Teaching Hospital Abbottabad.
22. Dr. Andaleeb Awan D/O Ghulam Muhammad Awan
B-G A.S.C. Colony Nowshera Cantt, District Nowshera.
23. Dr. Muhammad Ishfaq S/O Abdul Latif
Village Aimal Khel P/O Azim Killa, Tehsil & District Bannu.

Handwritten signature/initials, possibly 'D. Farah Ambreen'.

ATTESTED



- 24. Dr. Fahim-ud-Din S/O Qazi Shafi-ud-Din
House No. 185 Street No. 08 Sector E-2,
Phase-1 Hayatabad, Peshawar
- 25. Dr. Jameel Kifayat Ullah S/O Kifayat Ullah Amnir Zada
House No. 58 Street No. 4 Sector H-2,
Phase-2 Hayatabad, Peshawar.
- 26. Dr. Sadia Nisar Ahmad D/O Maj @ Dr. Nisar Ahmad Khan
House No. 92, 2K Armour Colony Manki Road Nowshera Cantt.
- 27. Dr. Israr Ullah Khan Dawar S/O Dr. H. Abdul Latif Khan Dawar
House No. 14 Khyber Officer Colony No.1,
Tehkal Payan University Road Peshawar.
- 28. Dr. Zai Ullah Khan S/O Nasrullah Khan
House No. 730E Muhallah Samander Khan New Gate Peshawar City.
- 29. Dr. Zubair Qayyum S/O Abdul Qayyum Mughal
Mughal House No. 1685/815 Allama Iqbal Town,
P/O Ayub Medical College Nandian Abbottabad.
- 30. Dr. Muhib-ud-Din S/O Dr. Fida Aiz-ud-Din
MS, DHQ Hospital Chitral.
- 31. Dr. Ali Ayub S/O Ayub Hassan Shah
House No. 498 Street No. 15 Dector E-3,
Phase-1 Hayatabad, Peshawar.
- 32. Dr. Muhammad Ishaq Khan S/O Muhammad Ibrahim Khan
City Net Zone Haji Muhammad Hawas Plaza, Sarai Nawrang,
P/O Nawrang Distt: Lakki Marwat.
- 33. Dr. Bushra Amir D/O Amin Ullah Jan Qazi
House No. 8B Street No. 3,
Phase-4 Hayatabad, Peshawar.
- 34. Dr. Fouzia Tabassum D/O Mushtaq Hussain Shah
Mushtaq Hussain Shan MCB Ayub Medical College Branch Abbottabad.
- 35. Dr. Nadia Mureed D/O Mureed Ali Khan
House No. 64 Street No. 5 Sector-5,
Hayatabad, Peshawar.
- 36. Dr. Abdul Hameed S/O Abdul Majeed
P/O Tarnab Form GT Road Jugyan Peshawar.
- 37. Dr. FAhd Nazir S/O Nazir Ahmad
Village Mian Isa, P/O Shabqadar, Tehsil & Distt: Charsadda.

Handwritten signature or name, possibly 'Nazir Ahmad'.

ATTESTED

14



P-8.

38. Dr. Gul Panrah Arbab D/O Arbab Tehseen Ullah Khan
House No. 138 Sector J-2, Phase-2,
Street No. 3, Hayatabad, Peshawar.
39. Dr. Adnan S/O Muhammad Zarfan
Village Maioga P/O Tehsil Oghi, Distt: Mansehra.
40. Dr. Khurshid Muhammad S/O Gul Muhammad
Village & P/O Pir Saddo Via Jalal Distt: Mardan.
41. Dr. Zia-ul-Haq S/O Hameed-ul-Haq
Village Zarbab, Garhi P/O Spina Warhi Tehsil & Distt: Charsadda.
42. Dr. Anwar Ali Khan S/O Raqeeb Khan
Village Bazida Kokal Khel P/O Torka Distt: Bannu.

For information and necessary action.

(DR. MANZAR ANWAR KHAN)
ASSISTANT DIRECTOR (DENTISTRY)
DGHS, NWFP, PESHAWAR.

11/16/10

Chair Ullah Agha

~~ATTESTED~~

ATTESTED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Serial No. GU/193

Gandhara University Peshawar



Certified that

ADNAN KHATTAK

Son / Daughter of

GOL NAWAZ KHATTAKY

and Student of the Executive Development Center Gandhara University having met all the

requirements under the semester system during the

Sessions

2009-2010

is this day admitted to the Degree of

Master in Public Health

Registration No.

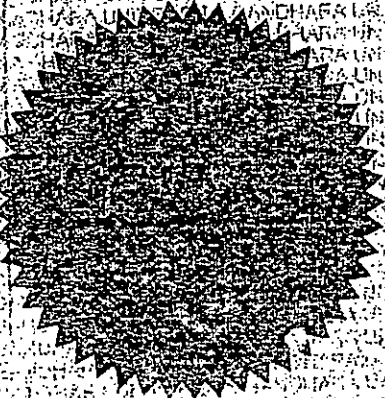
2009-MPH-193

Enrolment No.

17

Result declared on

11/12/2010



Vice-Chancellor

Amir B

GOVERNMENT OF N.W.F.P.
HEALTH DEPARTMENT

Dated Peshawar, the 5th December, 2009.

NOTIFICATION

No. SC/H-II/4-1/2009. Dr. Adnan Khattak, Dental Surgeon (BS-17), Govt. Lady Reading Hospital, Peshawar is hereby transferred and posted as Assistant Director, DGHS Office against the vacant post with immediate effect in the public interest.

SECRETARY TO GOVT. OF NWFP
HEALTH DEPARTMENT.

Endst. No. & date even.

Copy to the:-

1. Accountant General, NWFP Peshawar.
2. Director General, Health Services, NWFP Peshawar.
3. MS LRH Peshawar.
4. PS to Minister for Health.
5. PS to Secretary Health.
6. Computer Section, Health Department.
7. Officer concerned.

(Signature)
(Muhammad Jamil)
Section Officer-II

Copy also available on the website www.healthnwfp.gov.pk

OFFICE OF THE DIRECTORATE GENERAL HEALTH SERVICES NWFP, PESHAWAR.

2877

No. 45693-97 WE-I dated 10/12/2009.

Copy of the above is forwarded to the:-

1. M/S LRH, Peshawar.
2. AG, Office NWFP, Peshawar.
3. Accountant DGHS, Office NWFP, Peshawar.
4. EA-IV DGHS NWFP, Peshawar.
5. Doctor concerned.

for information and necessary action.

(Signature)
CDR SAIED QIL
ASSISTANT DIRECTOR (C-1)
DGHS NWFP, PESHAWAR.

ATTESTED

(Signature)
16/12/09



PROVINCIAL HEALTH SERVICES ACADEMY

Dept of Health, Govt. of Khyber Pakhtunkhwa
Budhni Road Duran Pur Peshawar
Ph #091-2650861, 2264716; Fax# 091-2261249
E-mail phsa_peshawar@yahoo.com
Affiliated with Peshawar University

Dated: 03-12-2011

F.No. 353/PHSA/HRD/SHRPD/2010-11/1690-96

To

The Secretary,
Govt. of Khyber Pakhtunkhwa,
Health Department, Peshawar.

Subject: COMPLETION OF TWO MONTHS (08 WEEKS) IN-SERVICE TRAINING OF DOCTORS OF MANAGEMENT CADRE FROM BPS-17 TO BPS-18.

Sir,

Reference letter No: SOH (EV)4-25/2011/(Promotional Course for officers of Management Cadre) Dated: 28-09-2011.

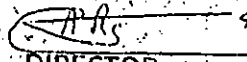
The following participants of Management Cadre (BPS-17) have completed their two months mandatory promotional training (w.e.f 03-10-2011 to 03-12-2011) and have been relieved w.e.f 03-12-2011 (Afternoon).

S. #	NAME OF DOCTOR.	PLACE OF POSTING
1	Dr. Ayaz Imran	MO, DHQ: Hospital, Abbottabad.
2	Dr. Muhammad Sangeen	MNCH Programme, Peshawar
3	Dr. Muhammad Akram	Demonstrator Bannu Medical College Bannu
4	Dr. Shehzad Faisal	MO KTH Peshawar.
5	Dr. Muhammad Ehsan Waheed	MO, DHQ:H; D.I.Khan
6	Dr. Fazal Rahim	MO EDO (H) Peshawar
7	Dr. Syed Jamal Akbar	Asstt. Director DGHS Peshawar
8	Dr. Safia	Instructor, PHSA, Peshawar
9	Dr. Jamal Abdul Nasir	AD DHS FATA Peshawar
10	Dr. Syed Nayyar Raza kazmi	MO KTH Peshawar
11	Dr. Muhammad Shuaib Khan	MO DHQ: Karak
12	Dr. Siraj Muhammad	Secretary Medical Faculty Peshawar
13	Dr. Abdul Quddus	MO THQ: Dogra Picket Khyber Agency
14	Dr. Intiaz Ali Shali	Provincial Focal Person (Technical) Polio Eradication, Khyber Pakhtunkhwa

ATTESTED

18

15	Dr. Amer Hamid	MO, LRH, Peshawar
16	Dr. Ahmad Faisal	MO EDO (H) Abbottabad
17	Dr. Anisa Afridi	WMO THQH Dogra Picket Khyber Agency
18	Dr. Syed Muhammad Idrees	MO RHC Ghundi Mohmand Agency
19	Dr. Sadiq Shah	MO DHS FATA
20	Dr. Azmatullah Khan	Coordinator HSRU Health Department Peshawar
21	Dr. Muhammad Qasim	MO, District TB Control Program Peshawar
22	Dr. Ikhtiar Ali	MO, DHS, FATA
23	Dr. M Akram Shah	AD, DGHS
24	Dr. Niaz Muhammad Afridi	MO, AHQH, Landikotal, Khyber Agency
25	Dr. Hafiz Ziaul Habib	MO Charsadda
26	Dr. Wali Khan	MO, DHS FATA
27	Dr. Ikram Ullah Khan	Coordinator, DHIS Project, KP
28	Dr. Asghar Khan	Demonstrator, KGMC, Peshawar
29	Dr. Adnan Khattak	Assistant Director (Nutrition) DGHS Peshawar


DIRECTOR

Copy forwarded for information and necessary action to;

1. The Additional Secretary (Dev), Health Department, Peshawar.
 2. The Director General Health Services, Govt. of Khyber-Pakhtunkhwa, Peshawar.
 3. The Chief, HSRU, Health Department, Peshawar.
 4. The Deputy Director (M), PHSA, Peshawar.
- 5 - 33. Course Participants.


ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA.
HEALTH DEPARTMENT.

E-7
A

No. SOH-IV/2-95/09/Australia.
Dated Pesh, the 19 July, 2011

A

NO OBJECTION CERTIFICATE

The Government of Khyber Pakhtunkhwa, Health Department has no objection in respect of Dr. Adnan Khattak, Assistant Director, Directorate General Health Services Khyber Pakhtunkhwa Peshawar, for travel to Australia and study under Australian Development Awards 2011.

SECRETARY HEALTH,
KHYBER PAKHTUNKHWA.

Endst: of even No & date.

Copy of the above is forwarded for information and further necessary action to:-

1. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
2. Malik Imran Ahmad, Scholarship Manager, ADS Level 4 Serena Business Complex, Khayaban-e-Suhrawardy Islamabad.
3. The Section Officer (F/Training) Govt. of Khyber Pakhtunkhwa, Planning & Development Department, Peshawar.
4. The Assistant Director (Immigration and Passport), Govt of Pakistan, Islamabad/Khyber Pakhtunkhwa Peshawar.
5. The P.S to the Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar.
6. The Officer concerned.

SECTION OFFICER-IV

ATTESTED

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10-12-11

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in P
Peshawar

06/12/2011

GOVERNMENT OF KHYBER PAKHTUNKHWA.
HEALTH DEPARTMENTNo.SOH-IV/2-95/2011/Adnan Khattak
Dated Pesh, the 10-12-2011.NOTIFICATION.

No.SOH-IV/2-95/2011. The Competent Authority is pleased to allow the Term and Condition in respect of Dr. Adnan Khattak; Assistant Director (Nutrition) DGHS Office Peshawar who has been selected for Master of Public Health under the Australian Development Scholarships Award-2012 commencing from 16.01.2012 to 31.12.2013 in Australia (two years), with condition that all expenses will borne by the Donor Agency and there will be no financial liability on the part of Govt. of Khyber Pakhtunkhwa.

- I) During the period of his training abroad he will be treated as on duty. He will be entitled to draw pay against his own post which would have been admissible to him.
- II) He will be allowed pay in foreign exchange in accordance with the instructions contained in Finance Department letter No. SOR.III(FD) 7-79/ Vol-III dated 22-10-1986.
- III) He would be entitled to house rent allowance, which has been admissible to him before proceeding abroad.
- IV) He will be allowed to Medical facilities on the scale and manner provided by the Aid giving agency.
- V) He will be allowed to draw subsistence allowance offered by the host country.
- VI) His passage both ways will be borne by the Aid giving agency.
- VII) His internal TA (within Pakistan) from the place of duty to the port of embarkation and back will be paid by Government.
- VIII) He will not be entitled to conveyance allowance during the period of his training.
- IX) He will submit a five years training bond to the Health Department.

SECRETARY HEALTH

Endst. Of even No& Date

Copy forwarded to:

1. The Accountant General Khyber Pakhtunkhwa Peshawar.

M. M. D. S.
(Section Officer (SR-III))
FINANCE DEPARTMENT

Copy to the.

1. Director General Health Services, Khyber Pakhtunkhwa
2. Section Officer (SR-III) Finance Department with reference to his letter No.SOSR-III/FD/7-26/2005, dated 03.12.2011
3. The Section Officer (F/Training) P&D Department.
4. Doctor concerned.
5. Section Officer-II Health Department.
6. PS to Secretary Health.

Amir
SECTION OFFICER-IV
HEALTH DEPARTMENT

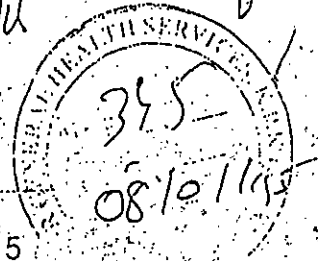
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GOVERNMENT OF
KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 6TH January, 2015

NOTIFICATION

NO.SO(E)H-V/6-67/2014. Ex-post facto sanction is hereby accorded to the grant of one year Extra Ordinary Leave (Without pay) with effect from 01.01.2014 in respect of Dr.Adnan Khattak Dental Surgeon (BS-17) attached to Director General Health Services Khyber Pakhtunkhwa.

SECRETARY HEALTH
Govt of Khyber Pakhtunkhwa.

Endst. of even No. & Date.

Copy to the :

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa.
3. P.S to Secretary Health Department.
4. PS to Minister Health Khyber Pakhtunkhwa.
5. Computer Programmer Health Department.
6. Officer concerned.

(Signature)
(HINA HAFEEZ)
SECTION OFFICER-V

118
121

OFFICE OF THE DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

No. 1270-72/E-I

Dated: 23/1/2015

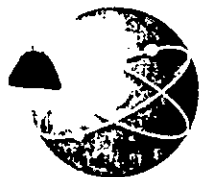
- Copy of the above is forwarded to the -
1. Accountant General Khyber Pakhtunkhwa.
 2. AE-II DGHS office Peshawar.
 3. Doctor Concerned.
- For information and necessary action.

ATTESTED

(Signature)
ASSISTANT DIRECTOR (P-I)
Directorate General Health
Services Khyber Pakhtunkhwa

RADIOLOGY IMAGING SOLUTIONS

FOOTSCRAY | POINT COOK | RICHMOND | CAIRNLEA



*Apk 11/2014 - HJ
220*

Appointment Details

03/12/14

Date HAM

Time _____

Patient Details

Adnan Khattak
23 Gezireh St
Pascoe Vale South
3044 Victoria
DOB: 04/09/1980

Imaging Request

MRI

Clinical Details

Back pain, numbness: recent RTA

Referring Doctor

Dr John Smith
B.B.S (Melb) FRANZCR

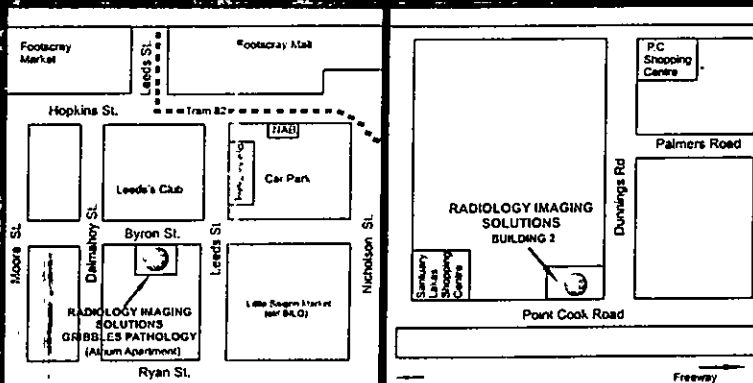
Routine Phone report: _____
 Urgent Fax report: _____

Doctor's Signature

John Smith

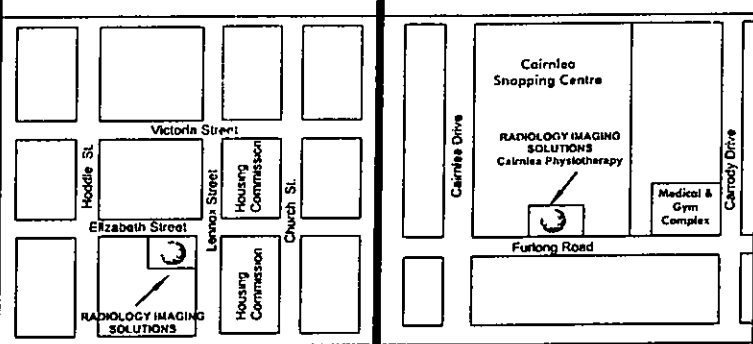
Date of Referral

03/12/14



FOOTSCRAY
42A Byron Street
Footscray VIC 3011
TEL: 9689 9446
FAX: 9689 9896

POINT COOK
1-11 Dunnings Road
Point Cook VIC 3030
TEL: 9395 8588
FAX: 9395 7588



RICHMOND
102 Elizabeth St Richmond Vic 3121
(corner of Elizabeth St & Lennox St)
TEL: 9395 8588
FAX: 9395 7588

CAIRNLEA
Shop 3A Cairnlea Shopping Centre
100 Furlong Rd, Cairnlea Vic 3023
TEL: 9390 0841
FAX: 9390 0891

Opening Hours

Branch	FOOTSCRAY	POINT COOK	RICHMOND	CAIRNLEA
Opening Hours	Mon-Fri 9am-5pm Sat 9am-2pm	Mon-Fri 9am-5.30pm Sat 9am-1pm	Please call to make appointment	Please call to make appointment
Ultrasound	✓	✓	✓	✓
X-Ray	✓	✓		
OPG	✓	✓		
CT		Coming Soon		

Appointment Details

Branch FOOTSCRAY
Date 03/12/14 Time 11:00am

Female Patients

YES NO
 Is there a chance you might be pregnant?
 Do you consent to have an internal ultrasound?
 Patient Signature: _____

Patient Instruction

- Upper Abdominal Ultrasound**
Please do not eat or drink for 6 hours prior to appointment.
- Renal/Prostate/Male Pelvic Ultrasound**
Please drink 1 litre of water 1 hour prior to appointment.
Do not empty bladder until appointment is completed.
- Obstetric/Pelvic or Lower Abdominal Ultrasound**
Please drink 1 litre of water 1 hour prior to appointment.
Do not empty bladder until appointment is completed.

ATTESTED

23

Radiology Imaging Solutions
42A Byron St
Footscray, Vic 3011
Tel: 03 9689 9446
Fax: 03 9689 9896

RADIOLOGY IMAGING SOLUTIONS

ABN: 70 141 731 333

Footscray Medical Group Pty Ltd

ACN: 141 731 333

05 December 2014

Mr. Adnan Khattak
23 Gezireh St
PASCOE VALE STH VIC 3044
DOB: 04/09/1980

MRI CERVICAL AND LUMBAR SPINE

Clinical History: Back Pain, Numbness: Recent RTA

Technique: Multi-planar T1 and T2 Imaging

Findings:

Within the cervical spine the vertebrae are mis-aligned.

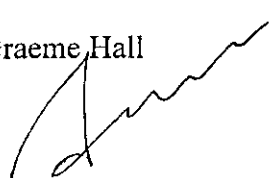
At C4-5 the disc is moderately desiccated with severe reduction in disc height. Joint degenerative changes, disc bulge is present. Significant canal narrowing. Cord compression.

At C5-6 the disc is mildly desiccated with reduction in disc height. Joint degenerative changes, disc bulge is present. Significant canal narrowing. Cord compression.

At L4-5 the disc is moderately desiccated with severe reduction in disc height. Early end plate degenerative changes and facet arthropathy. There is annular tear located to the left midline with shallow disc protrusion. Significant canal narrowing. Cord compression.

At L5-S1 the disc is moderately desiccated with severe reduction in disc height. There is annular tear located to the right midline, disc bulge is present. Significant canal narrowing. Cord compression.

Dr Graeme Hall



ATTESTED



29

Forest Lakes Shopping Centre
Cnr Field Road & Forest Lakes Blvd,
Wyndham Vale, Vic 3024
Tel: 03 9638 4156
Fax: 03 9638 4166

Forest Lakes Medical Centre

ABN: 70 141 731 333

Forest Lakes Medical Group Pty Ltd

ACN: 141 731 333

08 December 2014

Mr. Adnan Khattak
23 Gezireh St
PASCOE VALE STH VIC 3044
DOB: 04/09/1980

MEDICAL CERTIFICATE:

I have reviewed Adnan in my clinic today. Attached herewith findings of his MRI.

I declare Adnan unfit to work or travel for a minimum time period of 6mths inclusive. Being unfit to perform normal tasks until 08/05/2015. To be reviewed again on 11/05/2015 or sooner if required.

Clinical History: Back Pain, Numbness: Recent RTA

Technique: Multi-planar T1 and T2 Imaging

Findings:

Within the cervical spine the vertebrae are mis-aligned.

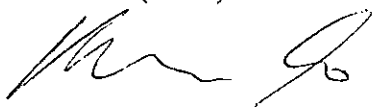
At C4-5 the disc is moderately desiccated with severe reduction in disc height. Joint degenerative changes, disc bulge is present. Significant canal narrowing. Cord compression.

At C5-6 the disc is mildly desiccated with reduction in disc height. Joint degenerative changes, disc bulge is present. Significant canal narrowing. Cord compression.

At L4-5 the disc is moderately desiccated with severe reduction in disc height. Early end plate degenerative changes and facet arthropathy. There is annular tear located to the left midline with shallow disc protrusion. Significant canal narrowing. Cord compression.

At L5-S1 the disc is moderately desiccated with severe reduction in disc height. There is annular tear located to the right midline, disc bulge is present. Significant canal narrowing. Cord compression.

Dr John Smith
M.B.B.S (Melb) FRANZCR



ATTESTED

25



Adnan Khattak

23 Gezireh St
 Pascoe Vale South, Victoria 3044

M 04/09/1980

Your Reference

Previous specimens received

Tests Requested

Lumbar Puncture (CSF) Diagnostics

Containers Collected

- Fasting
- Non Fasting
- Pregnant
- Horm Therapy
- LMP
- EDC
- Cervical Cytology
- Site Cervix
- Vaginal Vault
- Endometrium
- Other
- Post Natal
- Post Menopausal
- Radio Therapy
- IUCD
- Abnormal Bleeding
- Appearance of Cervix
- Benign
- Suspicious

Clinical Notes Back pain, numbness, Recent RPA

Pt requires complete movement restrictions.
 Unable to work/travel for 24/52 weeks inclusive until 08/05/2015.
 TBA: 11/05/2015

PERSON COLLECTING SPECIMEN(S) TO COMPLETE:
 I certify that the pathology specimen accompanying the request was collected from the patient stated above as established by direct enquiry and/or inspection of wrist band.
 Signed: *[Signature]*
 Specimen Date & Time: / / Hrs

REQUESTING DOCTOR'S SIGNATURE AND REQUEST DATE

[Signature]
 08/09/14

Referring Doctor (Name, Address, Provider No.)

Dr John Smith
 Field Rd & Forest Lakes Blvd
 Wyndham Vale, Vic 3024
 03 9638 4156

No initial Status: State the patient's status at the time of service or when the specimen was collected:
 Pri: in patient in a private hospital or approved day hospital facility
 Pri: in patient in a recognised hospital
 Pub: in patient in a recognised hospital
 Out: patient of a recognised hospital

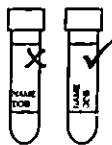
Urgent Phone Fax By Time:
 Phone/Fax No.
 Private Concession Bulk Bill
 Vet Affairs/Work Comp No:
 Copy Reports To:

Hospital/Ward
 Staff ID Loc. Code Cwl. Type Account Name/Address
 Hosp. Code Ward Pay Cat.

Medicare Assignment: (Section 20A of the Health Insurance Act 1973) I assign my right to benefits to the approved pathology practitioner who will render the requested pathology service(s) and any eligible pathologist determinable service(s). Patient Account Statement: Your doctor has requested tests, according to clinical need. Some of these tests may not be eligible for Medicare rebate, for which you will receive an account.

PATIENT'S SIGNATURE *[Signature]* Date 08/09/14 Practitioner's Use Only DOCTOR (Reason Patient Cannot Sign)

Your doctor has recommended that you use Melbourne Pathology. You are free to choose your own pathology provider. However, if your doctor has specified a particular pathologist on clinical grounds, a Medicare rebate will only be payable if that pathologist performs the service. You should discuss this with your doctor.



Date	Time	Date	Time	Date	Time
Name		Name		Name	
DOB	Initials	DOB	Initials	DOB	Initials

Tests Requested

Patient Account Statement: Your doctor has requested tests, according to clinical need. Some of these tests may not be eligible for Medicare rebate, for which you will receive an account. Melbourne Pathology ABN 63 074 699 139, a subsidiary of Sonic Healthcare Ltd APA, 103 Victoria Parade, Collingwood Victoria 3066

ATTESTED

ALBERT PARK 51 - 55 Dunkin Pt M-F 8-11	BRIGHTON 22 Careyway St M-F 8-6 Sat 8-11	CLIFTON HILL 2188 Queens Parade M-F 8-30-5	FOOTSCRAY Ground Fl, 30 Eleanor St M-F 8-30-5	MALVERN 253 Wattleree Rd M-F 8-30-5	NORTHCOOTE 147 Westbourne Cve M-F 8-30-12:30	ST ALBANS 131 Alton Rd West M-F 8-30-11:30	FRANKSTON 28 Cranbourne Rd M-F 8-12	BALLAN 33 Cowie St M-F 8-6 Sat 8:30-1
ALBERT PARK* 141 Victoria Ave M-F 7-9	BRIGHTON* 29 Durrant St M-F 8:30-12	COBURG 2720 Sydney Rd M-F 9-1	FOOTSCRAY 81-83 Paisley St M-F 8:30-5 Sat 8:30-11:15	MALVERN* 1368 High St M-F 8-4 Sat 8-12	OAKLEIGH SOUTH 1295 Centre Rd Tu-W 9-12	ST ALBANS 30/30A East Esplanade M-W 8-12	FRANKSTON 267 Cranbourne Rd M-F 9-4:30	BALLARAT* 706 Sturt St M-F 8:30-4:30
ALTONA 110 Bay St M-F 8:30-1	BRIGHTON* 110 Bay St M-F 8:30-5	COBURG 1738 Louisa St M-Th 8-1	FOREST HILL* 249 Canterbury Rd M-F 8-4 Sat 8:30-11:30	MALVERN EAST 325 Wattleree Rd M-F 8:30-12:30	OLINDA 485 Mt D'ong Tourist Rd M-F 8-12:30	ST KILDA* 81 Grey St M-F 8-3	FRANKSTON Frankston Private Hospital, L3, 24 - 28 Frankston-Flinders Rd M-F 8:30-5	BALLARAT* 63 Victoria St M-F 8:30-5
ALTONA Chr Ouse & Sargood Sts M-F 7:30-5	BRIGHTON 393 Nev St M-F 8-5 Sat 9-12	COBURG NORTH Sh 16, 120 Sussex St M-F 8-12 Sat 9-1	GLEN IRIS* 314 - 318 Warrigal Rd M-F 8:30-5	MCKINNON 86 McKinnon Rd M-F 8-12	PAKENHAM Unit 2, 63 Main St M-F 8-4:30 Sat 8-12	ST KILDA EAST* 290 Inkerman St M-F 8:30-4:30 Sat 9-12	FRANKSTON 47 Davey St M-F 8-8 Sat & Sun 9-12	BALLARAT 17 Erand St North M-F 8:30-1
ALTONA NORTH 350 Blackshaws Rd M-F 8:30-5 Sat 9-12	BRIGHTON EAST* 767 Nepean Hwy M-F 8-4:30 Sat 8:30-11:30	CRANBOURNE 26 William St M-F 8-5 Sat 8-12	GLEN IRIS 300 Warringal Rd M-F 9-11:30	MELBOURNE 9th Fl, 24 Collins St M-F 8-5	PAKENHAM* 34 Station St M-F 8-4 Sat 8-11:30	STRAITHMORE 25 Woodland St M-F 9-12	FRANKSTON 15 Hastings Rd M, Tu & F 8:30-12:30	BALLARAT 28 Drummond St North M-F 8:30-12:30
ALTONA NORTH* 2174 Miers Rd M-F 8-4:30 Sat 9-12	BRIGHTON EAST 162 Thomas St M-F 8:30-1	DAWSONGONG 9 - 11 Putney St M-F 8-6 Sat 8:30-1:30	GLEN IRIS 177 Burke Rd M-F 8-4:30 Sat 8:30-12	MELBOURNE* G Fl, 20/517 St Kilda Rd M-F 8:30-4:30	PARKDALE 133 Parkers Rd M-F 8-12:30	SUNSHINE 96A O'Shanassy St M-F 8-5 Sat 8-11	FRANKSTON 203 - 205 Beach St M-F 8-12:30	BENDIGO Bendigo Day Surgery, 1st Fl, 1 Chum St M-F 8:30 Sat 9-12
ARMADALE 1002-1004 High St M-F 8-12	BROADMEADOWS 383 Camp Rd M-F 8:30-1	DAWSONGONG 35 Kang St M-F 9-12:30	GLENHAY 89 - 91 Justin Ave M-F 10-2	MELBOURNE 8th Fl, 267 Collins St M-F 7:30-3:30	PATTERSON LAKES Shop 22-23 Harbour Plaza Thompsons Rd M-F 8-12:30	SUNSHINE 141 Durham Rd M-F 8-5 Sat 8:30-11:30	HASTINGS* 44 Victoria St M-F 8:30-5 Sat 9-12	BENDIGO 63 - 65 Bridge St M-F 8-4:30
ASHBURTON* 330 High St M-F 8-4	BROADMEADOWS 383 Camp Rd M-F 8:30-1	DAWSONGONG 1403 Heatherton Rd M-F 8-4 Sat 8:30-12	GLEN WATLEY* 238 Springvale Rd M-F 7:30-2	MELBOURNE L8, 459 Little Collins St M-F 8-12	PORT MELBOURNE Sh 2, 405 Bay St M-F 8-1 Sat 8:30-12:30	SUNSHINE Sunshine Plaza, 324 Hampshire Rd M-F 8:30-4:30 Sat 9-12	LANEWARRAH* 35 - 37 Frankston- Cranbourne Rd Tu, W & Th 8:30-4:30	BENDIGO 64 Breen St M-F 8:30-1
ASHBURTON 448 Warrigal Rd M-F 8-6 Sat 8-12	BRUNSWICK 524 Moreland Rd M-F 8-12:30	DEEPOENDE 59 Whitehorse Rd M-F 7:30-5:30 Sat 8-12	GLEN WATLEY* 258 Springvale Rd M-F 7:30-2	MELBOURNE L3, 423 Bourke St M-F 8:30-1:30	PRARRAN Victoria House Hospital 316 - 324 Malvern Rd M-F 8-12	SUNSHINE WEST 475 Fitzgerald Rd M-F 9-1	LANEWARRAH* 35 - 37 Frankston- Cranbourne Rd Tu, W & Th 8:30-4:30	BENDIGO 84 Molton St M-F 8-4:30
BALACLAWA* 2878 Carle St M-F 8-5 Sat 8-12 Sun 9-12:30	BURDOORA 119 Plenty Rd M-F 8:30-12:30	DEER PARK Sh 14, 20 Mt Derrimut M-F 8-4 Sat 8:30-12:30	GREENSBOROUGH 25 Grimshaw St M-F 8-7 Sat 8:30-12	MELBOURNE L3, 23 Ov Ico 292 Swanston St M-F 8-7 Sat 9-1	PRESTON 325 Chapel St M-F 9-5:30 Sat 9-12	SYDENHAM 566 Melton Hwy M-F 8:30-1:30	LANEWARRAH* 35 - 37 Frankston- Cranbourne Rd Tu, W & Th 8:30-4:30	BENDIGO 84 Molton St M-F 8-4:30
BALACLAWA* 2878 Carle St M-F 8-5 Sat 8-12 Sun 9-12:30	BURDOORA 119 Plenty Rd M-F 8:30-12:30	DEER PARK Sh 14, 20 Mt Derrimut M-F 8-4 Sat 8:30-12:30	GREENSBOROUGH 25 Grimshaw St M-F 8-7 Sat 8:30-12	MELTON Cnr Unitt & Alexandra Sts M-F 8-4	PRESTON Sh Cx-08 Northland SC 250 Murray Rd M-F 8-4:30 Sat 9-12	SYDENHAM 566 Melton Hwy M-F 8:30-1:30	LANEWARRAH* 35 - 37 Frankston- Cranbourne Rd Tu, W & Th 8:30-4:30	BENDIGO 84 Molton St M-F 8-4:30
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*Centre closed for lunch. Please visit www.mps.com.au for specific opening times. Times & locations correct at time of printing - 08/10/15

MELBOURNE PATHOLOGY

FASTING INSTRUCTIONS FOR PATIENTS
Some tests require a patient to have fasted prior to collection of the sample. The most common tests that require fasting are lipid testing including cholesterol, triglycerides, HDL/LDL, glucose and GTT. To ensure reliable and accurate test results, it is important that you follow these instructions carefully if you are having a fasting test.

- Please ensure that you have nothing to eat or drink (other than water) for at least 8 hours and no longer than 15 hours, prior to presenting for the test (preferably overnight).

- Please maintain an adequate level of plain water consumption to ensure good hydration. Tea, coffee and soft drinks must not be consumed during the fasting period.
 - Smoking should be avoided.
 - If you have fasted for more than 15 hours, your results could be compromised. Accordingly, your doctor will be advised that your results could be misleading. You may be advised to defer the test to the next day.
 - If you are a diabetic or are taking any morning medication, please consult your doctor before fasting.
- If you are having a test that does not require fasting, we suggest that you come into our collection centre AFTER 10:30am to avoid lengthy waiting times.

For a full, up-to-date list of all collection centres, visit www.mps.com.au

Clinical Centres for specialised procedures are shaded blue

Privacy Note: The information provided will be used to assess any Medicare benefit payable for the services rendered and to facilitate the proper administration of government health programs, and may be used to update enrolment records. Its collection is authorised by provisions of the Health Insurance Act 1973. The information may be disclosed to the Department of Health and Ageing or to a person in the medical practice associated with this claim, or as authorised/required by law.



M11271015

Annex 1
(21)

MRSA, PARENDA
13 GELFERN ST, PASOCE VALE SOUTH, 3044
Phone: 0404 894 788
Birthdate: 09/01/1980 Sex: F Medicare Number: 248920455
Your Reference: 12843924 Lab Reference: 12843924
Laboratory: B.
Addressee: Dr ERIC MERAC Referred by: Dr ERIC MERAC

Name of Test: US US Obstetric 12 weeks
Requested: 09/11/2015 Collected: 12/11/2015 Reported: 12/11/2015
14:08

BRUNSWICK DIAGNOSTIC IMAGING
82 MORELAND ROAD
BRUNSWICK VIC 3056
Phone: 03 9383 6266
Fax: 03 9384 0235

Radiologist's Report:

FIRST TRIMESTER PREGNANCY ULTRASOUND

There is a single live intrauterine pregnancy of CRL 12.9mm. This corresponds to a gestational age of 7 weeks 4 days, giving an EDD of 19/8/2016. Foetal heart rate is 160 beats per minute.
There is no perigestational or maternal adnexal abnormality.

CONCLUSION

Single live intrauterine pregnancy of 7 weeks 4 days.

Dr Ajay Kapoor
RSCR, FRANZCR Open FITWeb:
<https://hisfitweb.ddihealth.com/Fit3Web/FitWeb/ImageDisplay.aspx?guid=9181ED4B-A554-4C8E-B4CA-4CF917BB8479&requestid=12843924>


ATTESTED

28



Dr. A P Meakin
Dr. K New
Dr. M Mittal
Dr. C Frotman
Dr. R S Broadmore

Dr. C P Ho
Dr. P English
Dr. R C Wilkie
Dr. L West
Dr. D Barrie

Prof. A Pitman
Dr. L Zentner
Dr. K Fink
Dr. D Whitley
Dr. R Boktor

Tax Invoice 2432239

SADAF, Mrs Tabinda
23 Gezireh Street
PASCOE VALE VIC 3044

Issued: 04 Feb 2016

Folio: 11.07662881

Date	Items	Description	Amount
04 Feb 2016	55706	PREGNANCY US - 17-22 WEEKS LSPN: 004773	\$ 225.00

Total \$ 225.00

14 Feb 2016 Receipt 1025980 For Invoice/s 2432239
Card \$ 225.00

Payments -\$ 225.00
GST \$ 0.00
Balance Owing: \$ 0.00

Providing Dr: Dr V MERCURI (230448PL) 230448PL
Referrer: Dr Khurram Ajaz 291733EL
1b. Louisa Street COBURG VIC 3058

Referral date: 27 Jan 2016 Valid: 12 months
Account Payments or Queries - Phone 1300 654 568.
We would appreciate payment of this account immediately.

PAYMENT OPTIONS

IN PERSON At any Lake Imaging practice excluding Daylesford Hospital. Cash/Cheque/EFTPOS/Credit Card.

PHONE Credit Card payments accepted by phone 1300 654 568.

MAIL All payments to be made payable to Lake Imaging and sent to PO BOX 251, GEELONG 3220.

EFT Pay direct to Lake Imaging bank account BSB 013 516 ACCOUNT 8972 29472.
Remittance to be faxed to (03) 5273-1222 or email patientaccounts@lakeimaging.com.au.

Call your bank, credit union or building society to make this payment from your cheque, savings or credit card account.
For more information please visit www.bpay.com.au

Biller code: 40881

Reference:

CREDIT CARD AUTHORITY: Please charge my
 VISA MASTERCARD

Patients Name:
Card No:

Folio:

ATTESTED

29

3

Ref: Imag App-No:

13th May 2016

Hospital Patient ID: 768012



the women's
the royal women's hospital
victoria

Mrs Tabinda Sadaf
23 Gezireh St
PASCOE VALE SOUTH VIC 3044



Dear Mrs Sadaf,

You have an appointment for a consultation at the Women's, at 20
Flemington Rd, Parkville:

Appointment Date:	Friday 20th May 2016
Appointment Time:	2:30 pm (please arrive 15 minutes prior)
Clinic Name:	Ultrasound Complex - Obstetrics
Location:	Pauline Gandel Imaging Centre - Level 1 The Women's, 20 Flemington Rd, Parkville

Please allow up to 2 hours for your appointment. Please arrive 15 minutes prior to your appointment time, in order to complete paperwork. Please note: Failure to arrive on time may result in cancellation of your appointment.

Please bring your Women's Ultrasound request form (orange/white) provided by your referring doctor/clinic.

Please see the next page for details about parking, what to bring, and other useful information.

To reschedule / cancel: Phone: 8345 2250 (9am-5pm Mon-Fri)

Please notify us if your contact details change. Ph: 8345 2250

If you have any concerns about your health before your appointment, please see your GP.

Yours sincerely

The Royal Women's Hospital

ATTESTED

730
130
The Secretary to Govt: of KPK,
Health Department.



Arif

through proper channel

Subject:-

REQUEST FOR THE GRANT OF EXTENSION FOR A PERIOD OF 365-
DAYS EOL WITHOUT PAY

R/Sir,

It is requested that I am in need of further 365-days extension in leave as EOL without pay w.e.f. 01.01.2015 for resolving some domestic problem and due to unavoidable circumstances, I am not in position to join my duties after expiry of my leave.


Previously I was granted 365-days leave EOL without pay vide Govt: Notification No. SO (E H-V/6-67/2014 dated 06.01.2015 w.e.f. 01.01.2014 which has already been expired on 31.12.2014.

It is requested that I may please be granted the said leave for which I shall be very thankful to you for this act of kindness.

Thanks.

Dated:-23.04.2015

Yours Obediently,


Dr. Adnan Khattak,
Ex-AD (BS-17) DGHS,
Peshawar


ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA

HEALTH DEPARTMENT

NO. SOH(E-V)6-67/2014/Dr Adnan Khattak
Dated Peshawar the 1st June, 2015

Handwritten notes: 31, 16/6/15, 16/6/15

Handwritten signature and date: 09/6/15

To

The Director General
Health Services Khyber Pakhtunkhwa
Peshawar.

Stamp: 54/4, 08/06/15

Subject: REQUEST FOR THE GRANT OF EXTENSION A PERIOD OF 365-DAYS EOL WITHOUT PAY

I am directed to refer to your letter No.8604-E-I dated 13.5.2015 on the subject noted above and to state that the request of Dr. Adnan Khattak has been regretted by the competent authority.

Handwritten signature
(HINA HAFEEZ)
SECTION OFFICER-V

Endst No & Date Even.

Copy to the PS to Secretary Health Department.

Handwritten signature
SECTION OFFICER(EV)

OFFICE OF THE DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

No. 10/53-54/E-I

Dated: 16/6/2015

Copy of the above is forwarded to the:-

1. Registered:- Dr. Adnan Khattak s/o Gul Nawaz Khattak House No. 134, Street No.6, Sector C/1, Phase-5, Hayatabad Peshawar for information with the direction to report to this Directorate within 14-days of the issuance of this notice, failing which disciplinary action will be initiated against him under E&D Rules.
2. DA Dentistry DGHS KPK Peshawar for information.

ATTESTED

Handwritten signature and date: 16/6/15
ASSISTANT DIRECTOR (P.I)
Directorate General Health
Services Khyber Pakhtunkhwa

32

Amjad Ali Khan
Chief Secretary

SHOW CAUSE NOTICE

I, Amjad Ali Khan, Chief Secretary, Khyber Pakhtunkhwa as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Dr. Adnan Khattak Dental Surgeon (BS-17) Khyber College of Dentistry, Peshawar as follows: -

"you were absent from duty with effect from 01.01.2015 without prior approval of the competent authority till date"

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

3. I am satisfied that you have committed the act of "habitually absenting from duty/ misconduct" specified in rule 3 of the said rules:

4. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011: -

- a) removal from service
- b) _____

5. You are, therefore, required to show cause as to why the aforesaid penalty/penalties should not be imposed upon you.

6. If no reply to this notice is received with seven (07) days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

Amjad Ali Khan
(AMJAD ALI KHAN)
CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Dr. Adnan Khattak (BS-17)
Dental Surgeon
Khyber College of Dentistry, Peshawar

~~ATTESTED~~

33

[Handwritten scribbles and signatures]

15367
3-15/16

The Chief Secretary,
Khyber Pakhtunkhwa.

Prof. Chinnat
Show Cause Notice

Subject:

Sir,
I, Dr Adnan Khattak, was served Show cause notice through your esteemed office on 19 May, 2016. I hereby, take the opportunity to put some facts before you so as to explain my inadvertent absence from duty since 01 January, 2015.

I am currently in Australia along with my 08 months' pregnant wife and two kids. I have completed my Masters here but I was unable to join my duty on 01 January, 2015 on account of my health reasons and again this year because of my wife pregnancy, which are explained as follows.

- Road Traffic accident: I was severely injured in an accident in December 2014 resulting in injury to my backbone and slip vertebral discs. I received treatment for the same and was bedridden and forbidden from travel for 06 months at least (Medical reports Attached).

I have till now hidden this fact from my parents, living in Peshawar, as my mother is already too unwell and would have been unable to bear this stress. I hereby, also request not to forward any of my medical reports to my parents.

I was on treatment and rehabilitation till February, 2016. I am still currently receiving physiotherapy for the same, although I am able to function properly, Alhamdulillah.

- My Wife high risk Pregnancy: My wife, Tabinda Sadaf, is currently 08 months pregnant and is due on 19 June, 2016, Insha'Allah. She is suffering from Gestational diabetes and was advised on 16 November, 2015 that she will not be allowed to travel internationally because of her high risk pregnancy (Medical reports Attached).

The Airport authorities and Airline require a Medical Clearance certificate for Flights internationally for safety reasons. My wife was advised against travelling internationally for more than 04 hours because of her high risk pregnancy due to gestational diabetes.

I have all along since December, 2014 requested for Extra-Ordinary Leave (EOL) due to above mentioned reasons but unfortunately have been declined.

I hereby, once again appeal your esteemed office to grant me Extra-Ordinary Leave (EOL) till October, 2016. Although my wife is due on 19 June, 2016 but we will not be able to travel internationally because of baby passport requirement.

For baby passport I must follow the following procedure, which takes 03 months at least.

[Signature]
ATTESTED

33A

1. Documents from Hospital (signed by authorities). 01 week
2. Australian Birth Certificate (requirement of Pakistan Embassy). 04 weeks
3. Form S (Issued by Pakistan Embassy/Requirement for NICOP). 03- 04 weeks
4. NICOP (Issued by Nadra Pakistan). 03-04 Weeks
5. Machine Readable Passport (Must for International travel). 02-04 Weeks

As mentioned above, despite my willingness to join my department, I have been unable to join back my duty because of reasons out of my hands. I humbly once again request that I am not being absent from my duty due to negligence but had no choice otherwise.

As mentioned, I have appealed multiple times for grant of Extra Ordinary Leave (EOL) due to health reasons, and hereby, once again appeal your esteemed office to kindly grant me Extra Ordinary Leave (EOL) from 01 January, 2015 till October, 2016 so as I am able to serve my country in a better way after getting higher qualifications from Australia. Thanks.

Adnan

Dr Adnan Khattak
Ex-Assistant Director, DGHS, Peshawar.
BPS-17 (Management cadre).
Dated: 19 May, 2016

ATTESTED



39 Ann - M
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 23rd August, 2016

NOTIFICATION

NO.SOH(E-V)6-67/2014

WHEREAS Dr. Adnan Khattak (Dental Surgeon) (BS-17) attached to Khyber College of Dentistry, Peshawar was proceeded under the Govt of Khyber Pakhtunkhwa (Efficiency and Discipline) Rules, 2011 for the charges of absence from duty with effect from 01.01.2015 till date without prior approval of the competent authority.

AND WHEREAS Show Cause Notice was served upon him for which he replied.

AND WHEREAS charges of absence from duty with effect from 01.01.2015 to till date have been proved.

NOW THEREFORE in exercise of powers conferred under the aforementioned rules, the Competent Authority, after having examined the charges, evidence on record is pleased to impose the major penalty of Removal from Service upon Dr. Adnan Khattak Dental Surgeon (BS-17) attached to Khyber College of Dentistry, Peshawar

SECRETARY HEALTH
Govt of Khyber Pakhtunkhwa.

Endst. No & Date Even.

Copy to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Accountant General Khyber Pakhtunkhwa, Peshawar.
3. PSO to Chief Secretary Khyber Pakhtunkhwa
4. Director General Health Services, Peshawar.
5. Principal Khyber College of Dentistry, Peshawar.
6. PS to Minister for Health Khyber Pakhtunkhwa.
7. PS to Secretary Health Department.
8. PS to Secretary Establishment Department.
9. DHIS Cell DGHS Office, Peshawar.
10. Computer Programmer Health Department.
11. Officer/doctor concerned.

(MUHAMMAD ARSHID)
SECTION OFFICER(E-V)


ATTESTED

P.T.O

OFFICE OF THE DIRECTORATE GENERAL HEALTH KPK PESHAWAR

No. 1111-13 /E.I

Dated: 23/01/2017

Copy of the above is forwarded to:-

1. AG KPK Peshawar.
2. DHIS Cell DGHS office.

For information and necessary action.

Registered → 3. Dr. Adnan Khattak S/O Gul Nawaz Khattak, House No. 23, Sreet No. 6, Sector C/I Phase-5, Hayatabad Peshawar for information.

28/1/17
DEPUTY DIRECTOR (HR)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

~~ATTESTED~~

36

Amended 10

The Chief Minister,
Khyber Pakhtunkhwa, Peshawar.
(Appellate Authority).

L.No. 11875
Date 7/8
Secretary Health

Through: PROPER CHANNEL

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPOSITION OF MAJOR PENALTY OF REMOVAL FROM SERVICE WITHOUT ANY FAULT.

Sir,

With due regards and humble submission it is stated that:-

1. I was appointed as Dental Surgeon (B-17) on the recommendation of KP Public Service Commission on 04/10/2007 (Annex-A).
2. After rendering two years service as Dental Surgeon I also got MPH degree from Ghandhara University Peshawar in 2009-10 (Annex-B).
3. I was inducted in the Management cadre and posted as Assistant Director in the DGHS office w.e.f. 05/12/2009 (Annex-C).
4. I also got two months in service training of Doctors of management cadre for promotion from B-17 to B-18 on 03/12/2011 (Annex-D).
5. While serving as Assistant Director in DGHS office, I was selected for a training course of Master of Public Health under the Australian Development Scholarship Award 2012 commencing from 16/01/2012 to 31/12/2013 in Australia with condition that all the expenses will be borne by the donor agency.
6. NOC for proceeding abroad was given on 19/07/2011 (Annex-E).
7. The terms and conditions for the course were settled and notified on 10/12/2011 (Annex-F).
8. I went to attend the course in 2012.
9. Unfortunately, in December 2014, I met a road traffic accident resulting in injury to the backbone and slip vertebral discs and was receiving treatment to the same and was bedridden and forbidden from travelling initially for 06 months (medical reports/MRI reports and Medical advices attached at (Annex-G/1-4).
10. During my treatment in the hospital, my wife was also pregnant and was under treatment for gestational diabetes at a maternity hospital there (Annex-II/1-3).

As such I applied for extension of my stay abroad by requesting Extraordinary Leave (without pay) so as to enable me and my wife to return to Pakistan after regaining health. The Competent Authority accorded ex-post

10-12

~~RECEIVED~~

AS-G
DS-I

8/8/14

facto sanction on 06/01/2015 to the grant of 365 days EOL (without pay) from 01/01/2014 to 31/12/2014 (Annex-I).

As I had not regained my health and was not able to travel to Pakistan, I therefore again applied for further extension of EOL-without pay (Annex-J). I submitted all documentary proofs of my injury and pregnancy of my wife.

The department, however, regretted my request for further extension of my EOL (without pay) without indicating any reason for refusal of my request (Annex-K).

I did not receive this letter as it was sent to an address of my parents (Government allotted house) in Hayatabad, Peshawar, which my parents had left after retirement.

As such I was of the view that there was genuine/legal cause for my overstay abroad as I had provided all the relevant documents (medical reports). In terms of **Rule-13** of Khyber Pakhtunkhwa Govt. Services Revised Leave Rules, 1981 (Annex-L) **Leave applied on medical grounds shall not be refused**. The competent Authority to sanction leave, may, however at its discretion secure a second medical opinion.

Moreover, in such cases, under the relevant law "personal hearing" of the accused by competent authority is mandatory (Annex-M) and in no case can be dispensed with by the competent Authority.

In my case, **no opportunity of "Personal hearing"** was given to me by the competent authority, while deciding the case.

All these requirements of the rules have not been fulfilled. Besides, it was not a case of wilful absence in which conducting of an enquiry could be dispensed with. Therefore issuance of show cause notice (Annex-N) was not a proper action in this case.

I, however, still submitted my detailed reply of show cause notice supported with all relevant documents (Annex-O) but arbitrarily and against all the canons of justice, the competent authority imposed a major penalty of removal from service upon me (Annex-P) which tantamount not only to spoil my service career without any fault but also ruin the future of my family by condemning me to remain unemployed despite my BDS degree (Pak), promotional training course of Health management cadre from B-17 to B-18 and Master of Public Health from Australia.

Besides, reference is made to a judgement of Khyber Pakhtunkhwa Services Tribunal in case of Service Appeal No. 868/2012 (Annex-Q) filed

ATTESTED

by Dr. Abdul Sattar versus Secretary to Govt. of Khyber Pakhtunkhwa Health Department and 3 others. Reliance was also made in the said case (para 5 of the judgement) on case law reported as 2008-SCMR-214 wherein the Supreme Court of Pakistan further argued that penalty was not only harsh but also unwarranted as the appellant was not in position to attend his duty due to ailment of serious in nature.

In view of the above, it is crystal clear that I had not wilfully absented myself from duty but legally proceeded abroad for higher professional education where I obtained Master degree in Public Health beneficial not only for the nature of my duty but also for general public of province.

Happily, I met an accident and I remained under constant treatment in Australia and as such my overstay was neither wilful nor illegal.

Therefore, request your kind honour to set aside the notification of 23/06/2017 (endorsed on 16/01/2017) and I may be reinstated in service ab-initio with all back benefits of service by granting leave due for regularization of the period of overstay from 01/01/2015 till date.

Dated: _____

Yours's Obediently,

DR. ADNAN KHATTAK
Ex-Assistant Director
DGHS, Peshawar.

H.No. 402, Street -9, Sector E-6,
Phase-7, Hayatabad, Peshawar.

Copy to:

- 1. Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar.
- ✓ 2. Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar.

~~ATTESTED~~

39

[Handwritten scribble]



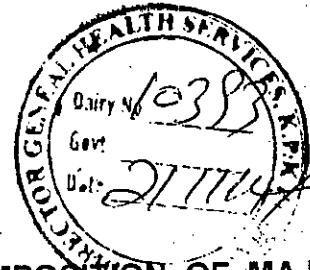
**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

NO. SOH(E-V)6-67/2016/Dr. Adnan Khattak
Dated Peshawar the 11th October, 2019

To,

**The Director General,
Health Services Khyber Pakhtunkhwa,
Peshawar.**

EI



**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE IMPOSITION OF MAJOR
PENALTY OF RMEOVAL FROM SERVICE WITHOUT ANY FAULT.**

I am directed to refer to your letter No. 2189/E-I dated: 08-02-2019 on the subject noted above and to enclose herewith a copy of letter No.SOR-II(E&AD)1-6/2009, dated 20-06-2019 received from Section Officer (R-II), Establishment & Administration (Regulation Wing) and to state that competent authority has filed the Appeal in the instant case being time-barred.

You are therefore, requested that Dr.Adnan Khattak, Ex- Dental Surgeon BS-17 may be informed accordingly, if deemed necessary.

Encl: As above.

[Large handwritten signature]
**(FAZAL UR-RAHIM)
SECTION OFFICER(E-V)**
[Signature]
SECTION OFFICER(F-V)

Encl. As Above

Copy to:-
The PS to Secretary Health.

OFFICE OF THE DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

No. 21121 /E-I

Dated: 21 /11/2019

Copy of the above is forwarded to Dr. Adnan Khattak S/O Gul Nawaz Khattak House No. 402, Street-9 Sector E-6 Phase-7 Hayatabad Peshawar for information.

ATTESTED

[Signature]
ADDL:DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

POWER OF ATTORNEY

In the Court of ICPK Service Tribunal Peshawar

Dr Adnan Ishaque } For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

Govt of IC PK and others } Defendant
} Respondent
} Accused
}

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/W, the undersigned, do hereby nominate and appoint
ZARAJ ANWAR & IMRAN KHAN ADVOCATES, my true and lawful attorney, for
me in my same and on my behalf to appear at _____ to appear, plead, act
and answer in the above Court or any Court to which the business is transferred in the
above matter and is agreed to sign and file petitions. An appeal, statements, accounts,
exhibits. Compromises or other documents whatsoever, in connection with the said matter
or any matter arising there from and also to apply for and receive all documents or copies
of documents, depositions etc, and to apply for and issue summons and other writs or sub-
poena and to apply for and get issued and arrest, attachment or other executions, warrants
or order and to conduct any proceeding that may arise there out; and to apply for and
receive payment of any or all sums or submit for the above matter to arbitration, and to
employ any other Legal Practitioner authorizing him to exercise the power and
authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other
lawyer may be appointed by my said counsel to conduct the case who shall have the same
powers.

AND to all acts legally necessary to manage and conduct the said case in all
respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf
under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the
Court/my authorized agent shall inform the Advocate and make him appear in Court, if the
case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be
held responsible for the same. All costs awarded in favour shall be the right of the counsel
or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____
Executant/Executants _____ *Ashraf*
Accepted subject to the terms regarding fee _____

Imran Khan
IMRAN KHAN
Advocate High Court

Zaraj Anwar
ZARAJ ANWAR
Advocate High Courts
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Mobile-0331-9399185