

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 761/2019

Date of Institution ... 17.06.2019

Date of Decision ... 16.07.2019

Dr. Fakhria Iqbal W/O Nasir Khan Durrani R/O Village Rahimya Sir Dheri, Tehsil
and District, Charsadda. ... (Appellant).

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar and two others.
... (Respondents)

Present.

Mr. Falak Naz Gigyani,
Advocate.

... For appellant

MR. HAMID FAROOQ DURRANI,

... CHAIRMAN

JUDGMENTHAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of notification dated 09.09.2009 issued by respondent No. 3, whereby, she was awarded major penalty of removal from service on account of absence from duty w.e.f May, 2008.

2. Learned counsel for the appellant heard and available record gone through.

3. The appellant was appointed as Women Medical Officer on 29.01.1997 and was posted at DHQ Hospital Mardan. On 27.02.2003, she was granted 696 days leave with half pay. On 23.02.2006, an extension of 365 days extraordinary leave was allowed in favour of appellant. Further, she was issued No Objection Certificate for her proceeding abroad. Upon completion of sanctioned leave and

due to non-resumption of duty the impugned order was passed against the appellant when she was proceeded against under the provisions of Khyber Pakhtunkhwa Removal from Service (Special Powers) Ordinance, 2000. A departmental appeal was preferred by her on 02.03.2019 which remained un-responded.

4. The available record including the memorandum of appeal, suggests that after availing 696 days leave the appellant left for Malaysia and joined service there as an employee of Ministry of Health, Malaysia. She continued as such under contract spanning over a period of more than 5 years. There is nothing on record to show that upon completion of her extended leave, granted on 23.02.2006 for a period of 365 days, any attempt was made by the appellant for further extension of Ex-Pakistan leave. Similarly, no sanction/order to that effect is available. The appellant did not perform her duty with the Health Department from May, 2008 and also did not care to prefer any departmental appeal against the impugned order for more than nine years. In the circumstances, the appeal in hand is considered without any merits calling for its admission for regular hearing. Resultantly, it is dismissed in limine. Guidance on the subject is sought from judgments reported as 2006-SCMR-453 and 2012-SCMR-195.

File be consigned to the record room.



(HAMID FAROOQ DURRANI)
CHAIRMAN



ANNOUNCED
16.07.2019

Form - A

FORM OF ORDER SHEET

Court of _____

Case No.- 761/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/06/2019	<p>The appeal of Dr. Fakhria Iqbal resubmitted today by Mr. Falak Naz Gigyani 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 20/6/19</p>
2-	24/06/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/07/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 761 /2019

Dr. Fakhriya Iqbal

VERSUS

Directorate General Health and Other

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APPELLANT

Through

Falak Naz Gigyani

Advocate

Peshawar.

Dated 13/06/2019

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

In Re S.A No. 761 /2019

Diary No. 861

Dated 17-6-2019

Dr. Fakhria Iqbal W/O Nasir Khan Durrani R/O
Village Rahimya Sir Dheri, Tehsil and District
Charsadda.

....Appellant

VERSUS

1. Chief Secretary Khyber Pakhtunkhwa.
2. Director General Health Peshawar.
3. Health Secretary Peshawar.

....Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE IMPUGNED ORDER NO.
SO(E)H-II/10-25/09(52) DATED 09/09/2009 OF
RESPONDENT No.3 ILLEGALLY WHICH THE
APPELLANT HAS BEEN REMOVED FROM HIS
DUTY.

Prayer:-

Re-submitted to -day
and filed.

ON ACCEPTANCE OF THIS APPEAL

THE IMPUGNED ORDER DATED

Registrar

20/6/19

09/09/2009 MAY PLEASE BE DECLARE
ILLEGAL AND THE APPELLANT MAY
PLEASE BE REINSTATED WITH ALL
BACK BENEFITS.

Respectfully Sheweth,

1. That the appellant was appointed by the competent authority as Medical Officer (BPS-17).
2. That the appellant was performed his duty in MOH office Malakand Thana Hospital as Medical Officer (BPS-17). (Copy of appointment letter is attached as "A").
3. That the appellant fulfilled all the codal formality for the appointment through

Public Service Commission and get good possession from all.

4. That the appellant was on leave for 696 days with half pay and left to Malaysia for employment by Ministry of Health Malaysia on contract base as Medical officer (BPS-17) on April 2003 where she worked upto 2017.

(Copy of 696 days leave is attached as "B")

5. That the appellant was applied for extension leave of one year on 02/02/2006 which was allowed by competent authority notification No. SO(E)H-III/1-5/2003/Part 2 ~~ANN C~~ but abroad contract of the health department Malaysia was more than 5 years therefore further extension of leave were not allowed by the competent ~~ANN E~~

authority to the appellant and was terminated No. SO(E)H-II/10-25/09(52) from service on 09/09/2009 through order by Secretary of Health. (Copy of termination order is annexed as annexure "~~E1 & F~~") D

7. That the appellant submitted a departmental appeal on 02/03/2017 after arrival from Malaysia which was no response to the appellant. (Copy of departmental appeal is annexed as annexure "E1") E

8. That the appellant again submitted an application on 02/03/2019 to the Respondent department for the reappointment / reinstatement because the appellant was trained by Ministry of Health Malaysia as a specialized Medical Officer. (Copy of award is annexed as annexure "~~G~~") F

9. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That not allowing of the appellant on his original post is an illegality on the part of the Respondent Department and utter violation of law and rules on the subject.
- B. That the appellant has not been treated according to law and mandatory provisions of law have been violated by Respondents.
- C. That the appellant is a Civil Servant and it is the responsibility of the Department to reinstate the appellant after arrival from Malaysia.
- D. That not allow extension of leave to the appellant is void because the appellant was on contract with the health department of Malaysia Upto 2017.


E. That the appellant seeks permission of this Hon'ble Tribunal for this additional grounds at the time of arguments.

It is therefore, most humbly prayed that on acceptance of this appeal the impugned order dated 09/09/2009 may please be declared illegal and the appellant may be reinstated with all back benefits.

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


APPELLANT

Through


Falak Naz Gigyani
Advocate, Peshawar.

Dated: 13/06/2019

NOTE:-

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


Advocate.

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Dr. Fakhriya Iqbal


VERSUS

Director General Health Peshawar and Other

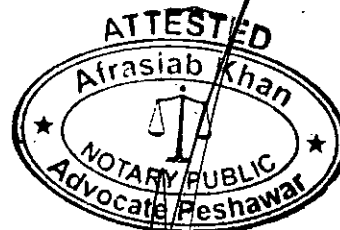
AFFIDAVIT

I, **Dr. Fakhriya Iqbal W/O Nasir Khan Durrani R/O Village Rahimya Sir Dheri, Tehsil and District Charsadda**, do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

Identified by:


Falak Naz Gigyani
Advocate, Peshawar.


DEPONENT



18/6/19

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Dr. Fakhriya Iqbal

VERSUS

Director General Health Peshawar and Other

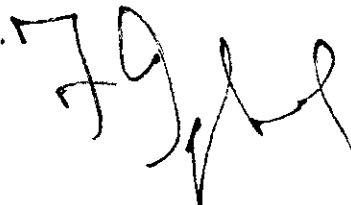
ADDRESSES OF PARTIES

APPELLANT.

Dr. Fakhriya Iqbal W/O Nasir Khan Durrani
R/O Village Rahimya Sir Dheri, Tehsil and
District Charsadda.

ADDRESSES OF RESPONDENTS

1. Director General Health Peshawar.
2. Health Secretary Peshawar.
3. ~~District Health Officer Swabi.~~

Chief Secy Hq Peshawar 

APPELLANT

Through


Falak Naz Gigyani
Advocate, Peshawar.

Dated: 13/06/2019

AND 12/2/57

A ~~AS~~

Appointment Letter

Page 9

DIRECTORATE GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

OFFICE ORDER.

On the recommendations of NWFP Public Services Commission, the Governor NWFP is pleased to appoint the following Doctors as ~~Women Medical Officer (BPS-17)~~ in the Health Department on temporary basis on the usual terms and conditions with immediate effect.

Consequent upon their appointment as WMOs (B-17) the following posting/transfers are hereby ordered in the interest of Public Service with immediate effect.

S.NO.	NAME OF DOCTORS	FROM	TO	REMARKS.
01.	Dr. Mah Munir Khan D/O Sher Mohammad Khan. TMO, HSTH, Peshawar.	Ist: Appoint (TSC) WMO (Contract) SHS, Swat.	WMO, SHS, Swat.	Against her original post.
02.	Dr. Sabina Aziz D/O Aziz Ahmad. TMO, KMC, Peshawar.	Ist: appoint: (PSC) WMO (Contract) SHS, Charsadda.	WMO, SHS, Charsadda.	-do-
✓ 03.	Dr. Maria Hatim D/O Hatim Ali.	Ist appointment. (PSC)	CH, Sherwan Distt: A-Abad.	Against the V/Post.
✓ 04.	Dr. Beena Hamid D/O Abdul Hamid.	-do-	WMO, THQ, Hosp: Taugi.	-do-
05.	Dr. Shazia Naz D/O Faqeer Mchd: Khan. TMO, HSTH, Peshawar.	Ist: Appoint: (PSC) WMO (Contract) SHS, Swat.	WMO, SHS, Swat.	Against her Orig: post
✓ 06.	Dr. Sultan Bibi D/O M. Zahir Shah.	Ist: Appoint: (PSC) WMO (Contract) SHS, A-Abad.	WMO, DHQ, Hosp: A-Abad.	Against the V/Post
07.	Dr. Rukhsana Anwar D/O M. Anwarud Din. TMO, HSTH, Peshawar.	Ist: Appoint: (PSC) WMO (Contract) SHS, Bannu.	WMO SHS, Bannu.	Against her orig: Post
✓ 08.	Dr. Shagufta Parveen D/O Fatheh Khan.	Ist appointment. (PSC)	WMO, CH, Khanpur Ayubia Distt: A-Abad.	Against the V/Post.
09.	Dr. Sadia Qayum D/O Qayum Nawaz.	-do-	WMO, CH, Chowdwan. (DI KHAN)	-do-
✓ 10.	Dr. Shahnaz Ajmal D/O Ajmal Khan Khattak. TMO, PGMI, Peshawar.	Ist: appoint: (PSC) WMO, (Contract) SHS, Karak.	WMO, SHS, Karak.	Against her original post.
✓ 11.	Dr. Ruzia Khan S/O Baz Mohammad Khan.	Ist appointment. (PSC)	WMO, AHQ, Hosp: Parach.	Against the V/ Post.
12.	Dr. Fakhira Iqbal D/O Mohammad Iqbal.	Ist: appoint: (PSC) WMO (Contract) DHQ, Hosp: Mardan.	WMO, DHQ, Hosp: Mardan.	Against her original post.
✓ 13.	Dr. Naghmana Iftikhar D/O Iftikharud Din.	Ist: appointment. (PSC)	WMO, Govt: Maternity Hosp: Peshawar.	Against the V/ post.

Handwritten circled mark containing the number 10.

A B

As a result of their aforesaid appointments the contract appointments of the doctors at S.No. 1, 2, 5 to 7, 9, 12, 14, 15, 18 to 25 & 27 above are hereby terminated with immediate effect.

The duties of FCOs who did their Part-I in various Specialities and working in the PGM/LEW/HSTM Peshawar for completion of their requirements should continue to work there till the availability of vacant posts in the said Institutions and draw their salaries from their original places of posting.

SD/-----
Director General Health
Services, NWFP, Peshawar.

NO. 2490-555/B.I, DATED PESH. THE 21/10/1997.

Copy forwarded to the:-

01. Secretary Health NWFP, Peshawar.
02. Administrator, Hayatabad Medical Complex, Peshawar.
03. All Divil: Director Health Services, in NWFP.
04. Incharge Govt; Maternity Hospital, Peshawar.
05. MS, DHQ, Hospital, Mardan.
06. MS, AHQ, Hospital, Parachinar.
07. MS, AHQ, Hospital, Miranshah.
08. MS, DHQ, Hospital, Abbottabad.
- 09-20. District Health Officers, Mardan, A-Abad, Mansehra, Swat Dir, Chitral, Malakand, Karak, Bannu, and DIKhan.
- 21-31. District Accounts Officers, Chitral, Malakand, Karak, Bannu, DIKhan Mansehra, Swat Dir, Chitral, Parachinar and Miranshah
32. Agency Accounts Officer, Parachinar and Miranshah
33. Accountant General NWFP, Peshawar.
34. All Doctors concerned.
35. Dean PCMT, Peshawar.
36. Administrator HSTH, Peshawar.
37. AS-IV DGHS, Office NWFP, Peshawar.
40. Acctt; Health Directorate NWFP, Peshawar.
for information and necessary action.

M. Iqbal
DIRECTOR GENERAL HEALTH
SERVICES, NWFP, PESHAWAR.

OFFICE OF THE MEDICAL SUPERINTENDENT D. H. Q. HOSPITAL MARDAN.

No. 565

Copy forwarded to Dr. Fakhria Iqbal Woman Medical Officer
DHCs Hospital Mardan for information and furnishing copy of the order of public
service commission in which her services are regularised.

Dated Mardan the 13/10/1997.
[Signature]
MEDICAL SUPERINTENDENT
D. H. Q. HOSPITAL MARDAN.

LADAC
696 days

AMT (B)

Page 10

HEALTH DEPARTMENT
Dated February 27, 2003

10

NOTIFICATION

No.SO(Estt)H-IV/1-5/2001: Sanction is hereby accorded to the grant of 696 days leave with half pay with immediate effect or from the date of availing in respect of Dr. Fakhria Iqbal WMO attached to C.H.Thana.

2. Certified that on expiry of her leave, he will report to this Department.

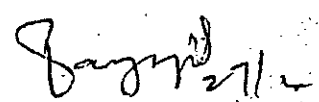
ADDL:SECRETARY HEALTH

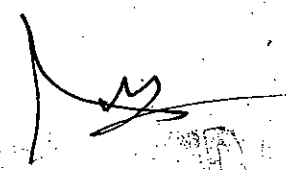
Endst: No.& date even:

Copy forwarded to the:-

1. Director General Health Services, NWFP, Peshawar with the request to detail a doctor to CH Thana on temporary basis.
2. EDO(H) Malakand w/r to his letter No.506/PF dated 4-2-2003.
3. DAO Malakand.
4. Doctor concerned.

28/2/03


(Muhammad Tayyab)
Section Officer (Estt)





(~~Ex~~) - One Year Leave Ex

ms
Pg

(11)

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

Dated Peshawar, the 23rd February 2006.

NOTIFICATION.

No.SO(E)H-II/1-5/2003/Part-2:- Sanction is hereby accorded to the grant of extension for 365 days Extra Ordinary Leave with effect from 2.2.2006 in favour of Dr. Fakhria Iqbal, Ex-WMO, Civil Hospital, Thana, Malakand Agency.


2. The Provincial Health Department has no objection on her proceeding abroad.

SECRETARY HEALTH.

Endst. No. and date even.

Copy to the:-

1. Director General, Health Services, NWFP, Peshawar.
2. EDO (H) Malakand.
3. DAO Malakand.
4. Doctor concerned.


(Ilam Khan Khattak)
Section Officer-II.



NOTIFICATION.

No. SO(E)H-II/10-25/09(52). WHEREAS, disciplinary proceedings were initiated against the following doctors (BS-17) for their wilful absence from duty.

S.No.	Name of doctor	Place of posting	Date of absence.
1.	Dr Shanza Noor (BS-17) D/O Abdul Salam	WMO RHC Usterzai, Kohat.	00.10.2007
2.	Dr Sahibzada Taimoor Yaqoob (BS-17) S/O S.M Yaoob.	Demonstrator, KMC, Peshawar	31.12.2008
3.	Dr Ajmal Khan (BS-17) S/O Fazal Akbar.	MO BHU Abazai, Charsadda.	01.02.2009
4.	Dr Muhammad Rafiq (BS-17) S/O Muhammad Akram	MO BHU Dilbora, Mansehra.	15.11.2008
5.	Dr Saadia Bibi (BS-17) D/O Syed Qabool Shah.	WMO office of EDO (H) Mansehra	15.5.2008
6.	Dr Ishfaq Ahmed (BS-17) S/O Muhammad Ayub Jan	Dental Surgeon, CH Muzafar Kot, Kurram Agency.	08.03.2008
7.	Dr Nighat Jamal (BS-17) D/O Badar Munir Khan	WMO DHQ Hospital, Batagram	27.06.2008
8.	Dr Hayat Muhammad (BS-17) S/O Muhammad	MO office of EDO (H) Dir Lower.	00.02.2005.
9.	Dr Muhammad Asghar Khattak (BS-17) S/O Muhammad Akram Khattak.	MO ATH, Abbottabad.	01.11.2008
10.	Dr Muhammad Arshad Malik (BS-17) S/O Malik Muhammad Ashraf	MO RHC Pattan, Kohistan.	31.10.2007.
11.	Dr Naheed Masood (BS-17) D/O Gulab Khan.	WMO CH Zarghun Khel, FR Kohat.	00.05.2008
12.	Dr Sardar Nawaz (BS-17) S/O Abdul Nawaz Khan	MO THQH Booni, Chitral	20.03.2009
13.	Dr Quaid Saeed (BS-17) S/O Akhunzada Behrawar Saeed	MO Health Department.	01.01.2009
14.	Dr Abdul Aziz (BS-17) S/O Muhammad Rauf.	MO HMC, Peshawar.	06.01.2009
15.	Dr Syed Affan Ahmed (BS-17) S/O Syed Mushtaq Ahmed.	MO office of EDO(H) Malakand	02.10.2007
16.	Dr Muhammad Ali Shah (BS-17) S/O Mumtaz Ali Shah	MO (BS-17) Health Department.	01.11.2008.
17.	Dr Saima Hameed (BS-17) D/O Abdul Hameed.	WMO DHQH Mardan.	24.02.2009
18.	Dr Ajmal Khan (BS-17) S/O Amin Khan	MO office of EDO (H) Dir (Upper)	00.05.2008.
19.	Dr Sultan Zeb (BS-17) S/O Muhammad Khan	Dental Surgeon DHQH Dir (Upper)	00.03.2009
20.	Dr Nasreen Yousaf (BS-17) D/O Muhammad Yousaf	WMO Health Department.	06.09.2008
21.	Dr Taimoor Kamal Jadoon (BS-17) S/O Muhammad Kamal Khan Jadoon.	MO King Abdullah Hospital, Mansehra.	22.03.2002
22.	Dr Romana Shaida Durrani (BS-17) D/O Shaida Muhammad.	WMO AHQ Hospital, Miran Shah, NW Agency.	27.10.2007
23.	Dr Amjad Hussain (BS-17) S/O Akhtar Hussain	MO ATH Abbottabad.	07.09.2006

24	Dr Alia Noor (BS-17) D/O Haider Zaman	Dental Surgeon, DHQ Hospital Mardan.	20.05.2008
25	Dr Zahid Saeed Khattak (BS-17) S/O Noor Ali Shah	Dental Surgeon, RHC Latamber, Karak.	13.07.2008.
26	Dr Khalid Irshad (BS-17) S/O Muhammad Irshad	MO Health Department.	12.10.2007
27	Dr Abdul-Hameed Orakzai (BS-17) S/O Niaz Gul Orakzai	MO Sarhad Hospital for Psychiatric Diseases, Pesh.	12.05.2008
28	Dr Arif Khalid Khan (BS-17) S/O Muhammad Khalid Khan	TMO PGMI, Peshawar.	01.09.2008
29	Dr Aiyasha Ishtiaq (BS-17) D/O Ishtiaq Ahmed	WMO BHU Shakh No.6 Distt: Charsadda.	08.12.2007
30	Dr Darakhshana Jabeen (BS-17) D/O Rehmat Ali Shah	WMO DHQH D.I.Khan.	25.02.2008
31	Dr Fakhar Zaman (BS-17) S/O Qamar Zaman.	MO BHU Nawar Khel, Lakki Marwat.	26.04.2005
32	Dr Farzana (BS-17) D/O Firdaus Khan	WMO RHC Bada Ber, Peshawar.	15.09.2008.
33	Dr Hina Ayub (BS-17) D/O Muhammad Ayub Khan	WMO RHC Gomal Bazar, Tank.	15.11.2007
34	Dr Iftikhar Ali (BS-17) S/O Bakhtiar	MO SGTH, Swat.	10.12.2007
35	Dr Irfanullah Khan (BS-17) S/O Taj Muhammad Khan	MO BHU Kot Hakim, Distt: Tank.	03.10.2007
36	Dr Javed Alam (BS-17) S/O Mir Alam	MO ATH Abbottabad.	30.10.2006
37	Dr Khalid Hussain Akhtar (BS-17) S/O Maqbool Hussain Akhtar.	MO Govt: LRH, Peshawar.	17.04.2008
38	Dr Khuram Ali Khan (BS-17) S/O Nawab Ali Khan	MO ATH, Abbottabad.	01.04.2008
39	Dr Muhammad Arif Khalil (BS-17) S/O Amin Khalil	MO BHU Durmera Kala Dhaka, Distt: Mansehra	11.09.2007
40	Dr Muhammad Hashim Khan (BS-17) S/O Mir Hassan Khan	MO Health Department.	01.05.2007
41	Dr Muhammad Naeem (BS-17) S/O Ahmed Hussain	BHU Narai, Distt: Kohat.	00.10.2007
42	Dr Muhammad Zikaria (BS-17) S/O Muhammad Iqbal	MO SGTH Swat.	30.03.2008
43	Dr Naseem Akhtar (BS-17) D/O Faqir Muhammad	WMO DHQH Kohat	00.00.2004
44	Dr Nasir Khan (BS-17) S/O Allaud Din Khan	Demonstrator, GMC D.I.Khan	18.10.2001
45	Dr Saifullah (BS-17) S/O Muhammad Zaman	MO Health Department.	00.09.2006
46	Dr Saima Noor (BS-17) D/O Syed Mushtaq Ali Shah Bokhari.	WMO DHQH Karak.	06.10.2008
47	Dr Sumaira Shehzad (BS-17) D/O Hakim Noor	WMO DHQH Hangu.	22.09.2007
48	Dr Qazi Siraj ud Din (BS-17) S/O Qazi Chiragh-ud-Din	MO BHU Togh Bala, Kohat.	00.11.2007
49	Dr Ansar ur Rehman (BS-17) S/O M.R Abbasi	MO BHU Nawan Sher, Abbottabad.	14.03.2007
50	Dr. Shahid Samad (BS-17) S/O Muhammad Abdus Samad.	Instructor, PIMT, Abbottabad.	03.01.2005

51.	Dr Zarlisht Yousafzai (BS-17) D/O Fatehullah	WMO DHQH, Charsadda.	26.06.2007
52.	Dr Fakhria Iqbal (BS-17) D/O Muhammad Iqbal Haq.	Under transfer to EDO (Health) office Buner.	00.05.2008

AND WHEREAS, absence notice were served upon them through their home address as well as through newspapers published in Daily "Dawn" and Aaj on 6.6.2009 & 4.6.2009 respectively with the direction to resume their duty within stipulated period.

AND WHEREAS, they failed to resume their duties in the stipulated period.

NOW THEREFORE, the competent authority after having considered the charges & evidence on record, in exercise of the powers conferred under Section-3 of the NWFP Removal from service (Special Powers) Ordinance, 2000 is pleased to impose the major penalty of Removal from Service upon the above-mentioned doctors with immediate effect.

SECRETARY TO GOVT. OF NWFP.
HEALTH DEPARTMENT.

Endst. No. & date even.

Copy to the:-

1. DGHS/DHS FATA.
2. Accountant General, NWFP, Peshawar.
3. EDOs (H)/Medical Superintendents/Agency Surgeons concerned.
4. DAO/AAO concerned.
5. Manager, Govt. Printing Press Peshawar.
6. Computer Section, Health Department.
7. Doctor concerned.

Sdf
(Muhammad Jamil)
Section Officer - II.

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

[Handwritten Signature]
ATTACHED

(E) - Departmental Appeal - 3961

The Secretary Health

Page 13

2/3
E 13

KPK Reshwan

Sub: Re-Instatement of Services

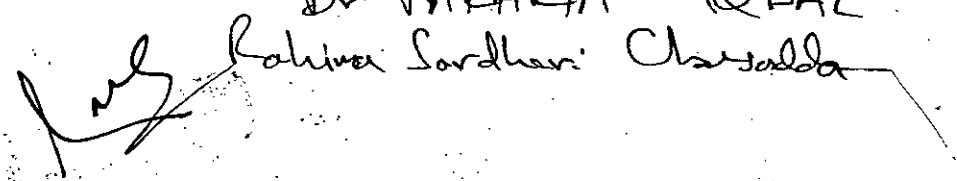
ASE
SO II

Dear Sir,

I, Dr Fakhria Iqbal, Last working station Thana Hospital, applied for extension of leave due to my job at MOH Malaysia. My application for Re-Instatement on 11/07/17 diary No 9879 is still not replied. Kindly re-rotate my services so I use my abilities to serve the people. I will not ask for seniority and allowances during my absence period.

F Iqbal

Dr FAKHRIA IQBAL

 Fakhria Sardhani Chaswada

0349 5203091

To

The Secretary of Health
NWFP Peshawar Pakistan.

Respectfully state.

That I was applied for
Extension in my Leave after
Expiration but the competent
Authority not accepted my
application and re-moved me
from my Service. I was
on contract with the Government
of Malaysia up 2017 and it
is not able to me to come to
Pakistan.

I therefore, requested to
re-instated me with
all back benefits.

Thanking.

Yours obediently
Dr. Fakhria Jeybali
Ex. Mott Tana Malakand

2-3-2019



JABATAN KESIHATAN NEGERI SABAH

*Anugerah
Perkhidmatan Cemerlang*

*Dengan sukacitanya menganugerahkan
Anugerah Perkhidmatan Cemerlang ini kepada*

DR. FAKHRIA NASIR DURRANI

*kerana telah menunjukkan perkhidmatan yang
cemerlang pada tahun 2008*



DR. HJ. MARZUKHI BIN MD ISA
PENGARAH KESIHATAN NEGERI SABAH

Appeal No. 761/2019, Date of Decision = 16/07/2019.

قیمت 50 روپے	7252			
ایڈوکیٹ: <u>خلیل ناز گلگانی ایڈووکیٹ</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <u>BL-16-7210</u>		رابطہ نمبر: <u>0315-9933697</u>		

بعدالت جناب: سر جسٹس اسٹریبل KPII لاہور

مخانبز	دعوی:
<u>ڈاکٹر فرخزیدہ نام حسرت</u>	علت نمبر:
بنام	مورخہ:
<u>ڈاکٹر ارمہ بیگم و سہیلیا</u>	جرم:
	تھانہ:

بامث تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کارروائی متعلقہ
ان مقام کے لئے خلیل ناز گلگانی ایڈووکیٹ کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کارروائی کے واسطے اور وکیل تیار مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
المقوم:

171018-571250-4

Dr. Farhana Nusrat Durrani: Tahsil Hatt Charsadda.
Wife of Mr. Sardary Rahimna.

مقام لاہور کے لیے منظور ہے۔
allowed
Accepted

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