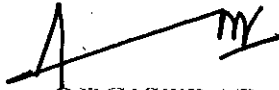


FORM OF ORDER SHEET

Court of _____

Case No. - 522/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge.
1	2	3
1-	09/03/2023	<p>The appeal of Mr. Raheem Khan presented today by Mr. Javed Iqbal Gulbela Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

Before The Hon'ble Khyber Pakhtunkhwa Services Tribunal
Peshawar

In S.A. 522 /2023

Raheem Khan (Ex-constable No.4608)

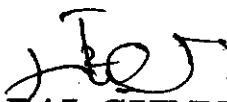
VERSUS

I.G.P Khyber Pakhtunkhwa & Others

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal with affidavit		1-5.
2.	Addresses of Parties.		6.
3.	Application for condonation of delay with Affidavit.		7-8.
4.	copy of impugned Removal from Service Office Order No: 2434-41/PA/SP, bearing OB. NO. 1673 Dated 29/06/2022 of The Office of Superintendent of Police Headquarters, Peshawar.	"A"	9.
5.	Copies of Departmental Appeal & impugned rejection of departmental appeal Office Order No: 4039-45/PA Dated: 09/12/2022 Of The Office Of The Capital Police Officer, Peshawar.	"B & C"	10-11.
6.	copies of service appeal 184/2019 and order & Judgment dated 14-06-2021	"D & E"	12-16.
7.	copies of medical documents	"F"	17-25.
8.	Other Documents	-	-
9.	Wakalatnama		26.

Dated: 08/03/2023

Appellant
Through 
JAVED IQBAL GULBELA
Advocate, Supreme Court of
Pakistan.

Off Add: B-1 2nd Floor, Al-Nimrah Centre, Govt College Chowk Peshawar

①

Before The Hon'ble Khyber Pakhtunkhwa Services Tribunal
Peshawar

In S.A. 522 /2023

Raheem Khan (Ex-constable No.4608) s/o Safdar Khan r/o
Mohallah kandi Bala, As-haab Baba, Chaghar Matti, Peshawar.

----- (Appellant)

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Capital Police Officer, Peshawar.
3. Superintendent of Police Headquarters, Peshawar.

----- (Respondents)

Service Appeal u/s 04 of The Khyber Pakhtunkhwa Service Tribunal Act 1974, against the impugned Office Order No: 2434-41/PA/SP, bearing OB. NO. 1673 Dated 29/06/2022 of The Office of Superintendent of Police Headquarters, Peshawar, Whereby The Appellant was 'Removed from Service', And against the impugned Office Order No: 4039-45/PA Dated: 09/12/2022 Of The Office Of The Capital Police Officer, Peshawar, Whereby The Departmental Appeal of The Appellant was rejected in a Classical, Cursory And Whimsical Manner.

Respectfully Sheweth,

1. That the appellant belong to a respectable family of district Peshawar, and has been appointed as constable in the year 2004.
2. That after getting onto the rolls of the Respondent/ Police Department the Appellant always remain punctual and dutiful fellow, who never left any stone unturned in the responsibilities and obligations bestowed upon his shoulders and for the same reason have always won felicitations and appreciation of his high-ups at certain junctures during the course of

employment, there has never ever been any sort of suit or sootage ever moved or lodged against the Appellant.

3. That initially the appellant was suspended from service without any reason on 07-01-2022, and thereafter he was removed from service in an illegal manner without adopting and conducting proper inquiry vide impugned Office Order No: 2434-41/PA/SP, bearing OB. NO. 1673 Dated 29/06/2022 of The Office of Superintendent of Police Headquarters, Peshawar. (copy of impugned Removal from Service Office Order No: 2434-41/PA/SP, bearing OB. NO. 1673 Dated 29/06/2022 of The Office of Superintendent of Police Headquarters, Peshawar, is annexed as annexure "A")
4. That feeling aggrieved from the acts of Respondent Police Department, the Appellant preferred a Departmental Appeal to the worthy Appellate Authority i.e. The Capital Police Officer, Peshawar; which was rejected, in a classical, cursory and whimsical manner, vide impugned Office Order No: 4039-45/PA Dated: 09/12/2022. (Copies of Departmental Appeal & impugned rejection of departmental appeal Office Order No: 4039-45/PA Dated: 09/12/2022 Of The Office Of The Capital Police Officer, Peshawar, are annexed herewith as annexure "B & C" respectively)
5. That it is pertinent to mention here, that the appellant was previously booked for absence and was dismissed from service, and thereafter he moved service appeal 184/2019 before this Hon'ble tribunal, which has been allowed and thus the appellant has been re-instated into service in June 2021. (copies of service appeal 184/2019 and order & Judgment dated 14-06-2021 are annexed as annexure "D & E")
6. That from the supra-mentioned episode, the grievances that comes into existence having the only remedy and forum available, the Appellant approaches this Hon'ble Tribunal for his

reinstatement into service with all back benefits, upon the following grounds inter alia.

Grounds:-

- A. That both the impugned removal from service order and Appellate Order are wrong, illegal, unlawful, void ab-initio and hence are liable to be struck down and set aside.
- B. That no Charge Sheet, no Statement of Allegations was ever served upon the Appellant and even then, the harshest penalty of removal from service was imposed upon the Appellant.
- C. That no inquiry was ever conducted in the case of Appellant, hence mandatory instruments of law are missing in case of the Appellant.
- D. That no opportunity of personal hearing was ever extended to the Appellant, thus was condemned unheard.
- E. That no Show-Cause Notice was ever issued to the Appellant and without following the codal formalities for Civil Servants, the Appellant was straight away remove from service in an illegal and void manner.
- F. That under the mandate of Article 4 of the Constitution, no one should be treated otherwise than in accordance with law, but here the case of the Appellant is volta-facie and a totally different yardstick has been taken to treat the Appellant.
- G. That the law and the law courts of the land have always appreciated and encouraged that the law and rules are to be followed and have always discouraged, deplored and depreciated any variation or deviation from the rules.
- H. That in the impugned removal from service order the period of alleged absences has been "treated as without pay", therefore the appellant has been double jeopardies by the respondents, which is not warranted

4

under the law. Hence the impugned orders are liable to be set aside.

- I. That from every angle the Appellant is entitled to be re-instate into service, with all back benefits.
- J. That any other ground not raised here, may graciously be allowed to be raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this instant Service Appeal, the impugned Office Order No: 2434-41/PA/SP, bearing OB. NO. 1673 Dated 29/06/2022 of The Office of Superintendent of Police Headquarters, Peshawar, And the impugned Office Order No: 4039-45/PA Dated: 09/12/2022 Of The Office Of The Capital Police Officer, Peshawar, may kindly be struck down and be set-aside and by doing so, the Appellant may very graciously be re-instated into the service with all back benefits.

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

Dated : 08/03/2023

Appellant

Through

Javed Iqbal Gulbela
Advocate, Supreme Court of
Pakistan

Saghir Iqbal Gulbela.

&
Syed Zain ul abideen

Advocates, High Court,
Peshawar

NOTE:-

No such like appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.

Advocate.

5

Before The Hon'ble Khyber Pakhtunkhwa Services Tribunal
Peshawar

In S.A _____/2023

Raheem Khan (Ex-constable No.4608)

VERSUS

I.G.P Khyber Pakhtunkhwa & Others

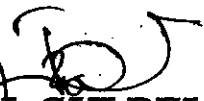
AFFIDAVIT

I, *Raheem Khan (Ex-constable No.4608) s/o Safdar Khan r/o Mohallah kandi Bala, As-haab Baba, Chaghar Matti, Peshawar*, do hereby solemnly affirm and declare that the contents of the Instant **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

CNIC:17301-7858302-7

Identified By:



JAVED IQBAL GULBELA

Advocate Supreme Court of
Pakistan

6

Before The Hon'ble Khyber Pakhtunkhwa Services Tribunal
Peshawar

In S.A _____/2023

Raheem Khan (Ex-constable No.4608)

VERSUS

I.G.P Khyber Pakhtunkhwa & Others

ADDRESSES OF PARTIES

APPELLANT.

Raheem Khan (Ex-constable No.4608) s/o Safdar Khan r/o
Mohallah kandi Bala, As-haab Baba, Chaghar Matti, Peshawar.


RESPONDENTS:

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Capital Police Officer, Peshawar.
3. Superintendent of Police Headquarters, Peshawar.

Dated: 08/03/2023

Appellant

Through


JAVED IQBAL GULBELA
Advocate, Supreme Court of
Pakistan

7

Before The Hon'ble Khyber Pakhtunkhwa Services Tribunal
Peshawar

In S.A _____/2023

Raheem Khan (Ex-constable No.4608)

VERSUS

I.G.P Khyber Pakhtunkhwa & Others

Application for Condonation of Delay


Respectfully Sheweth:-

1. That the Appellant is filing the instant Service Appeal, the contents of which may very graciously be considered as part and parcel of the instant application.
2. That the delay in filing the instant Appeal has not intentional, not deliberate but due to the circumstances beyond the control of the Appellant.
3. That the Appellant seriously injured in Road Accident and received injuries on head, chest and legs even his legs was fractures, and has gone through serious leg surgeries; And thus suffering from some serious Medical Problem, therefore, was not able to move a service Appeal within time & delay of almost two months occurred. (copies of medical documents are annexed as annexure "F")
4. That law and law courts of the land always encouraged that technicalities are to be avoided and the cases be decided upon its merits.

It is, therefore, most humbly prayed that on acceptance of the instant application, the delay of almost two months to approaching to this Hon'ble Tribunal may very graciously be condoned.

Dated: 08/03/2023

Through *Appellant*


Javed Iqbal Gulbela
Advocate, Supreme Court of
Pakistan

8

Before The Hon'ble Khyber Pakhtunkhwa Services Tribunal
Peshawar

In S.A _____/2023

Raheem Khan (Ex-constable No.4608)

VERSUS

I.G.P Khyber Pakhtunkhwa & Others

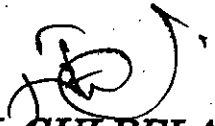
AFFIDAVIT

I, *Raheem Khan (Ex-constable No.4608) s/o Safdar Khan r/o Mohallah kandi Bala, As-haab Baba, Chaghar Matti, Peshawar*, do hereby solemnly affirm and declare that the contents of the Instant **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

CNIC:17301-7858302-7

Identified By:



JAVED IQBAL GULBELA

Advocate Supreme Court of
Pakistan

~~KHAN~~ (9)

"17-71" 24/6/22

ORDER

Annexure-A

This is a formal departmental proceeding against **Constable Raheem Khan No.4608** on the allegations/charges that he while posted at PS AMJS was not taking interest in his official duty vide DD report No.25 dated 07.01.2022 due to which he was suspended & closed to Police Lines vide OB No.124 dated 17.01.2022.

In this regard, he was issued charge sheet & summary of allegation. DSP Complaint & Enquiry was appointed as E.O. He conducted the enquiry & submitted his report/findings that the alleged official did not attend the enquiry proceedings. The E.O further recommended ex-parte action for the defaulter official.

Upon the finding of E.O, he was issued final show cause notice and delivered to him on home address through local Police PS Mathra to which he received by himself but he failed to submit reply of the said notice as yet.

Note: The defaulter official was called time & again for hearing but he failed. Therefore, fresh DD report of Moharrar Lines has been obtained on 14.06.2022. He reported that the defaulter official is still absent from lawful duty w.e.f 24.01.2022 till date.

From perusal of the findings of E.O and other material available on record it has been proved beyond any shadow of doubt that he is guilty of deliberate absence from lawful duty as he is not interested in his Police Job. Therefore, he is removed from service under Khyber Pakhtunkhwa Police Rules-1975 with immediate effect. Hence, the period he remained absent from 24.01.2022 till date is treated as without pay.


**SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR**

OB. NO. 1673 / Dated 29/06/2022

No. 2434-41 /PA/SP/dated Peshawar the 29/06/2022

Copy of above is forwarded for information & n/action to:

1. The Capital City Police Officer, Peshawar.
2. The SSP Investigation, Peshawar
3. DSP/HQrs, Peshawar.
4. Pay Officer, OASI,
5. CRC & FMC along-with complete departmental file.

خدمت جانتا ہے۔ اس میں کئی پوائنٹس افیئر صحت اور پیشاور

میں حکمتانہ اسلیم برائے بحالی ملازمت اور غلط فہمی اور ڈریٹ
نمبر 1673 حروف 29106 کی بنا پر پیش کیے ملازمت سے

2022
"Remove" کیا گیا ہے
x

1۔ جتنا عالی شان ہے۔ ذیل میں مسائل ہیں۔
! یہ کہ مسائل ایک مزید اور فرض شناس پوائنٹس میں۔ ڈیوٹی کو

2۔ ہمیشہ ایمانداری سے انجام دیا ہے۔
یہ کہ مسائل دوران ڈیوٹی کوئی مسئلہ نہ ہو اور ہر کام کو بھاری سے
مسائل کا تجربہ ہے۔ بدن اہم اسناد مشورہ کے عمل کو نہ قابل میں ہے

3۔ یہ کہ مسائل نے اسی بیماری کی اطلاع ہر وقت جانے سہا ہے۔ برقی مگر
بد قسمتی سے سب سے کمزوری کی بنا پر ایڈوانس میں ڈیوٹی لینے یا تبدیل

4۔ لینے سے ماضی رہا۔
یہ کہ اس پر دوران مسائل ہو ڈیوٹی سے غیر جانبدار ہو اور انکو اپنی شہرت کا حکم
حاصل مسائل کو سماعت کا موقع دینے پر پیش مسائل کو مداح کو خود دینی میں

5۔ یہ کہ مسائل نے سہارا دیکر ملازمت سے "Remove" کیا گیا ہے۔
یہ کہ مسائل نے سہارا دینی ہوئی ہے اور مسائل میں ہر کام کو سماعت کو

توانا کر رہا ہے۔
جو تعلق مسائل ایک مزید اور معزز الیکٹرانک ہونے اور ہر کام کو سماعت
مسائل اور مسائل کے تمام اہل فائدہ کی معیشت کا واحد ذریعہ ہے۔
اس لئے درخواست ہے کہ مسائل میں مزید اور معلومات کو پیش نظر رکھ کر
مسائل کو ملازمت پر دوبارہ بحال فرما کر وہ کو روکا جائے۔ ہر کام کو سماعت

15/8
4608 سالانہ سٹینڈ
Contact: No 0311-9934098

11

Annexure 'C'



OFFICE OF THE
CAPITAL CITY POLICE OFFICER
PESHAWAR

ORDER

This order will dispose of the departmental appeal preferred by SA Constable Rahim Khan No. 4608, who was awarded the major punishment of "Dismissal from service" under CP PR 1975 (amended 2014) by SP/HQ Peshawar vide OB No. 1673 dated 29/06/2022.

Short facts leading to the instant appeal are that the defaulter Constable was proceeded against departmentally on the charges that he will posted at PS AMIS Peshawar was not taking interest in his official duties vide DD report No. 25 Dated 07/01/2022 due to which he was suspended and closed to Police Lines Peshawar. As per report of Muharrar Police Lines Peshawar the defaulter Constable absented himself from his lawful duty from 24/01/2022 to 29/06/2022 (02 months & 05 days) without leave permission of the competent authority.

He was issued proper Charge Sheet and Summary of Allegations by SP/HQ Peshawar. DSP complaint and inquiry was appointed as inquiry officer to scrutinize the conduct of the accused official. The inquiry officer after conducting proper inquiry submitted his findings while recommending the official for appropriate action. The competent authority in light of the findings of the inquiry officer issued final Show Cause Notice which was delivered at his home address through local police of PS Maira but he failed to submit reply to the said notice hence awarded the above major punishment.

He was heard in person in O/R and the relevant record along with his explanation received. During personal hearing the appellant failed to submit any plausible explanation in his defence. He stated that his absence was not intentional rather it was due to his illness but failed to produce any medical documents to cover the absence period. He had been reinstated after his dismissal in the year 2018. But failed to mend his ways and again dismissed in 2022. He does not deserve any leniency. Therefore his appeal for setting aside the punishment awarded to him by SP/HQ Peshawar is hereby rejected/fled.

(MUBAMMAD ARSHAD) PSP
CAPITAL CITY POLICE OFFICER
PESHAWAR

No. 110594/SA dated Peshawar the 29/06/2022

- Copies for information and necessary action to file
- SP/HQ Peshawar
- AD/ICCP Peshawar
- CAS Pay Officer W/O
- PMC along with (copy) Missal
- Official Concerned

12

Annexure - D



BEFORE THE HONBLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

S.A. 184 /2019

Khyber Pakhtunkhwa Service Tribunal

Entry No. 133

Dated 30/1/20

Rahim Khan Ex-Constable No. 5450.

R/O chagwa maddi Peshawar (Appellant)

VERSUS

1. Chief Capital City Police Officer, Peshawar.
2. Superintendent Of Police, Head Quarters, Peshawar.

----- (Respondents)

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE ORDER OF DISMISSAL FROM SERVICE OF THE APPELLANT DATED 13/04/2018 AND ORDER DATED 08/01/2019 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO REASON.

Filed to-day
Registrar
30/1/19

Re-submitted to -day and filed.

Registrar
27/1/19
PRAYERS:-

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED ORDERS DATED 13/04/2018 & 08/01/2019 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE REINSTATED INTO SERVICE WITH ALL BACK BENEFITS.

ATTESTED
[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

13

Annexure - "E"

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 184/2019

Date of Institution
Date of Decision

30.01.2019
14.06.2021



Rahim Khan, Ex-Constable No.5450 R/O Chaghar Matti,
Peshawar.

(Appellant)

VERSUS

Chief Capital City Police Officer, Peshawar and one another.

(Respondents)

Naila Jan,
Advocate

For appellant

Asif Masood Ali Shah,
Deputy District Attorney

For respondents.

AHMAD SULTAN TAREEN
ROZINA REHMAN

CHAIRMAN
MEMBER (J)

[Handwritten signature]
14/6/21

JUDGMENT

ROZINA REHMAN, MEMBER (J) : Appellant was a Constable. He was dismissed from service. It is the legality and validity of this order which has been challenged by him in the present service appeal filed U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

ATTESTED
[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

2. Brief facts giving rise to the present appeal are that appellant was appointed as Constable and he served the Department for 15 years with unblemished service record. He was dismissed from service on the charge of absence from duty vide order dated 13.04.2018. He filed departmental appeal which was dismissed, hence, the instant service appeal.

3. Learned counsel for appellant argued that the impugned orders are against law, illegal and unlawful as major penalty of dismissal from service was imposed upon the appellant without holding any proper inquiry. He contended that no show cause notice had been served upon the appellant before termination of his services and neither any departmental inquiry had been held in his case nor any opportunity of personal hearing had been afforded to the appellant. He further contended that major penalty was imposed without recording any evidence and without publication in two leading newspapers under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and Police Rules, 1975.

3
14/6/21

4. Conversely, learned D.D.A submitted that appellant was appointed as Constable in the Police Department who absented himself from his lawful duty without leave or prior permission from the competent authority. He submitted that he was issued charge sheet and summary of allegation, where-after, S.D.P.O Cantt. was appointed as inquiry officer. He was summoned by the inquiry officer time and again but he failed to join the inquiry proceedings. He contended that upon the findings of the inquiry officer, he was also

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal

issued final show cause notice but he failed to submit his reply and after completion of all codal formalities, he was awarded major punishment of dismissal from service.

5. Perusal of record would reveal that the present appellant was charged for willful absence from duty. From the impugned order dated 13.04.2018, it is evident that ex-parte proceedings were initiated against the appellant. The appellant has annexed prescription chits with his appeal and also alleged in his departmental appeal the reasons of his absence. As per record, he met with an accident, where-after, he was examined by Medical officer who prescribed medication after examining him. He was having fracture on lumber region and in right hand elbow joint.

6. Nothing is available on file which could show that the appellant was properly informed to attend the departmental proceedings/inquiry proceedings. His illness as well as his medical record was not taken into consideration. From the order of appellate authority dated 08.01.2019, it is evident that the medical record of appellant was referred to S.P Headquarter Peshawar for verification from the concerned hospital. Allegedly, his medical record was not available on record of the K.T.H Peshawar. In this regard, nothing was brought on record in black & white in order to show any sort of correspondence in between S.P Headquarters and Administration of K.T.H Peshawar.

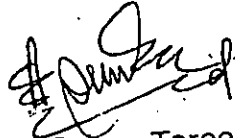
7. Disciplinary proceedings initiated against the appellant suggest that the appellant was not afforded proper opportunity of defense. In

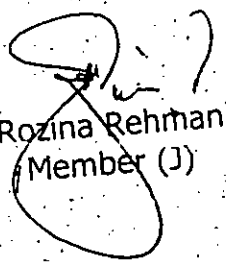
ATTESTED


14/4/21

the circumstances, it is a case for de-novo inquiry. Hence, the appellant is reinstated for the purpose of de-novo inquiry to be conducted within 90 days of receipt of this judgment. Needless to mention that the appellant shall be provided proper opportunity of defense during the inquiry proceedings. The issue of back benefits shall be subject to final outcome of the de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.
14.06.2021


(Ahmad Sultan Tareen)
Chairman


(Rozina Rehman)
Member (J)

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar.

Date of Presentation of Application 14-7-2021
Number of Words 2050
Copying Fee 22/-
Urgent 4/1
Total 26/-
Name of Copyist _____
Date of Completion of Copy 14-7-21
Date of Delivery of Copy 14-7-21

VOL. 28(5/12/11)

MR No.

2 2 9 9 8 9 1 6

OF 2011-1

Adm = 2695/151

Peshawar

17

15-12-22

Sahar
Permanant

Dr. Javed Iqbal

Bed # 10/A

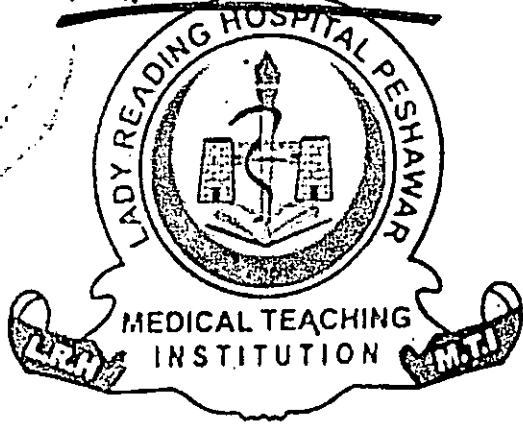
12

15/12/11

khay@lrh.edu.pk

MEDICAL TEACHING INSTITUTION

Annex - F



LADY READING HOSPITAL PESHAWAR, KPK

Ph: 0092-91-9211430-39
Website: www.lrh.edu.pk
E-mail: info@lrh.edu.pk

Patient Name Pakeem Khan

Father's Name: 90 Ladar Khan Contact: 036 8090243

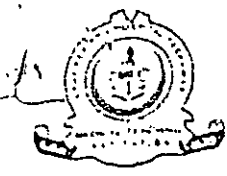
Age/D.O.B: 38 - 10 Gender: M

Allergies: _____ Blood Group: _____

CNIC No. 17301-7855830-7

CONFIDENTIAL

103



EMERGENCY DEPARTMENT
LADY READING HOSPITAL
 MEDICAL TEACHING INSTITUTION
 PESHAWAR, KHYBER PAKHTUNKHWA 20

5879

18

Invoice #: K02223439711
 Invoice Date: 14-DEC-22 18:55:38

MRN: K0200023593916

Name: Rahem Khan

Gender: Male

Age: 38 Year(s)

District: Peshawar

Father/Husband Name: SAFDAR KHAN

Serial No. 109847

Department: EMERGENCY

Counter: EMERGENCY

RTA

- Dring - clear
 - Rectally - clear B/L E sacs of 96%
 on RA.

Findings:

- B.p. 231/130 pulse = 105

- GCS E4 V4 M5 B/15

- Rec abd - soft / Numbness / Numb distals

- Pelvic stable.

- Long bones → open fracture left leg. wound approx 5cm

- Abnormal in the forehead

- PEARL

- IV line

- IV Midazolam 5mg

- IV analgesia

Investigations:
 CT - Brain → Normal
 CT - chest
 Xray left leg AP/lat.

Diagnosis:

ETC

15.4
 116

Next Visit:

Consultant Name:

Signature:

Phone: 92-1430

website: www.lrh.gov.pk

Dr. [Signature]

Patient Name : **MUSHEEM NAWAZ**
 Father/Husband Name : **SAFDAR KHAN**
 Sex : **Male** Age : **38 Year(s)**
 Date of Birth : **14-12-1984** NIC.#: **1730178583027**
 Admission No. : **K0222000145616** Bed #: **K021550**
 Ward Name : **Casualty Orthopedic Male-(COM-08)**
 Address : **House # , Street # , Sector/Area Peshawar Pakistan**
 Phone Number : **92 0316 9090243**

Medical Record No. : **000-22998916**
 Order # : **22-0231197**
 Invoice # : **K02223441341**
 Invoice Date : **15-DEC-2022 12:11 AM**
 Receipt # : **K0222268475**

In House Doctor : **DR JAVED IQBAL**

Sr.No	CPT ID	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Report Date	Doctor Name	Bo
Inpatient Department - LRH											
1	59850	ADMISSION FEE	NO	1	100.00			100.00			
2	59882	OT ADMISSION FEE	NO	1	100.00			100.00			
3	59883	PATIENT ATTENDANT GATE PASS	NO	1	20.00			20.00			
Total Amount								220.00			
Cash								220.00			



Lady Reading Hospital, MTI

Phone: +92-91-9211430, Fax: -
E-mail: info@lrh.edu.pk, Website: http://www.lrh.edu.pk

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SURGERY REPORT

Medical Record Number : K02-00022998916
Departmental Ref. # : 220021613
Name : RAHEEM KHAN
Address :
Personal Phone :
NIC Number : 17301-7858102-7
Sex : Male
Age : 38 Year(s)

Order By : Dr Javed Iqbal
Referring Physician :
In-house Consultant : DR JAVED IQBAL
Remarks :
Requested : 15-DEC-2022 10:05
Plan Date : 15-DEC-2022 00:00
Perform Date : 15-DEC-2022 11:16

Procedure Performed : EX FIX TIBIA

Code	Surgery procedure	Site	Surgeon	Anesthetist
S1094	External Fixator	Left	Dr Javed Iqbal	Dr Mishal Mudasir
Blood Loss	: 5ML	DVT prophylaxis	: Yes	
Anesthesia		Time incision started	10:16	Time of closure: 11:00 Total time: 00:44
Spinal Anesthesia				
1st Assistant to surgeon	: Dr Ibrahim Khan	Scrub nurse	:	
2nd Assistant to surgeon	: Dr Anwar Hassan	Circulating nurse	:	
3rd Assistant to surgeon	:	Technician	:	
4th Assistant to surgeon	:			
Pre operative diagnosis	: OPEN TIBI AND FIBULA #			
Post operative diagnosis	: OPEN TIBI AND FIBULA #			
Incision	:			
Findings	:			
Procedures	: UNDER SPINAL ANAESTHESIA, PATIENT CLEAN AND DRAP, FRACTURE REDUCED, EX FIX DONE, DRESSING DONE			
Drains	: No			
Closure	:			
Operative complications	: NIL			
Histology Specimen Sent	: No			
Patient destination	: WARD			
Post OP Orders	: SEE ONLINE MEDICATIONS X RAY LEFT LEG AP AND LAT			

Date Addendum

Electronically verified report, no signature(s) required.

SR/OP/2022/12/15/11:16:00

SR/OP/2022/12/15/11:16:00 - OPD/FIC/REG/2022

آبادگی برائے میڈیکل اسرجیکل طریقہ علاج اور
رسید برائے وصولیابی اطلاعات

ڈاکٹر صاحبان

اہانت دیتا دیتی ہوں۔ بشمول ان کے پیٹنٹ یہ وہ معاہدہ میں ہوں کہ وہ میرا امریشن (نام)۔

میڈیکل ریکارڈ نمبر 8989 (2299) کا

یہ تشخیص میڈیکل اسرجیکل طریقہ علاج بشمول ضروری و مناسب بے ہوش کرنے کی وہ اہر وے کار لائیں۔

نہوں کو اس امر کی بھی اجازت دیتا دیتی ہوں کہ وہ کوئی بھی ایسا طریقہ اختیار کریں جو میری صحت یا بی میں ممانوں ہوں۔ اس آپریشن سے مجھے تمام معلومات بہم پہنچادی گئی ہیں۔ علاج کے متبادل طریقے، اگر کوئی ہیں تو ان سے بھی آگاہ کر دیا گیا ہے مجھے۔ سبھا دیا گیا ہے کہ علاج میں پیش آمدہ مشکلات کے امکانات اور نوعیت سے متعلق اس وقت کوئی تہمی رائے نہیں دی جاسکتی لہذا یہ کہ علاج کے نتائج یا صحت کے بارے میں کوئی یقین دہانی نہیں کرائی جاسکتی۔

یہ اصطلاحات میں اس آپریشن اور طبی طریقہ علاج کی صورت میں حال اور تصدیق ہے کہ۔

Explain further

نہاں اکثر کو بشمول ان کے معاہدہ میں اور مددگاروں کے، اس امر کی اجازت دیتا دیتی ہوں کہ وہ ایسی اضافی خدمات مہیا کریں، کہ جنہیں نہاں اور مناسب تصور کرتے ہیں۔ وہ کسی شخص کے بغیر کے بے ہوش کرنے والے کسی بھی ذرائع، انیسرے کے شعبہ یا ایبارٹری کی خدمات لے سکتے ہیں۔ اور ان تمام امور سے متعلق میں اپنی آہنگی کا اظہار کرتا کرتی ہوں میں اس امر کا اقرار کرتا کرتی ہوں کہ میں نے یہ آہنگی نبھالی ہے۔ علاج کے طریقہ یا طریقوں سے متعلق پوچھے گئے تمام سوالات کے اطمینان بخش جواب دیئے گئے ہیں۔ یہ تمام خالی جگہیں میرے ہاتھ کرنے سے قبل پر کی گئی تھیں۔ آہنگی کا یہ فارم موثر رہے گا۔ تاوقتیکہ میں تحریری طور پر اسے منسوخ نہ کروں۔

مکے دستخط _____ تاریخ _____

علیہ السلام دارالحدیث

صلی علیہ وسلم

17301-9049215 کارڈ نمبر

لاری کرنا کرتی ہوں کہ فارم کی تمام خالی جگہیں دستخط سے قبل پر کردی گئی تھیں، میں نے امریشن کے نمائندے سے دستخط ثبت کرنے سے پہلے امریکی تفصیلی وضاحت بہم پہنچادی تھی۔

تاریخ:

آہنگی کے دستخط:

Lady Reading Hospital, MTI Peshawar

Lady Reading Hospital, MTI Peshawar. Phone: 091-9211430, Fax: --

Email: info@lrb.edu.pk, Website: www.lrb.edu.pk

DISCHARGE SUMMARY

23



Medical Record Number: K0200022998916

Name : Raheem Khan

Sex : Male

Age : 35 Year(s)

Address : House # , Street # , Sector/Area Peshawar Pakistan

City : Peshawar , Pakistan

Person Phone :

Home Phone :

Admission No. : K0222000145616

Admission Date : 15-DEC-2022 00:11:39

Admission Status : Emergency

Discharge No : 22000135124

Discharge Date : 19-DEC-2022 16:41:55

Discharge Status : Improved

Primary Consultant : DR JAVED IQBAL

Admitting Consultant : DR JAVED IQBAL

Diagnosis During This Admission :

Background Medical Problem(s) (List any chronic medical conditions that the patient may have, such as diabetes mellitus, asthma, hypertension etc.):

Reason for Admission:

OPEN TIBIA #

Diagnostic & Therapeutic Procedures Performed :

TIBIA AO EX-FIX DONE FOR OPEN TIBIA #

Followup Instructions:

INJ 250M 2G IV BID.....5DAYS

TABLET VELOSEF-500MG 1+1.....16DAYS

TABLET VOREN SR

1+1.....5DAYS

TABLET SHELL-C 1 TABLET DAILY1MONTH

COME TO OPD AFTER 2 WEEKS

Instructions:

RAHEEM A H M + 8

RAHEEM

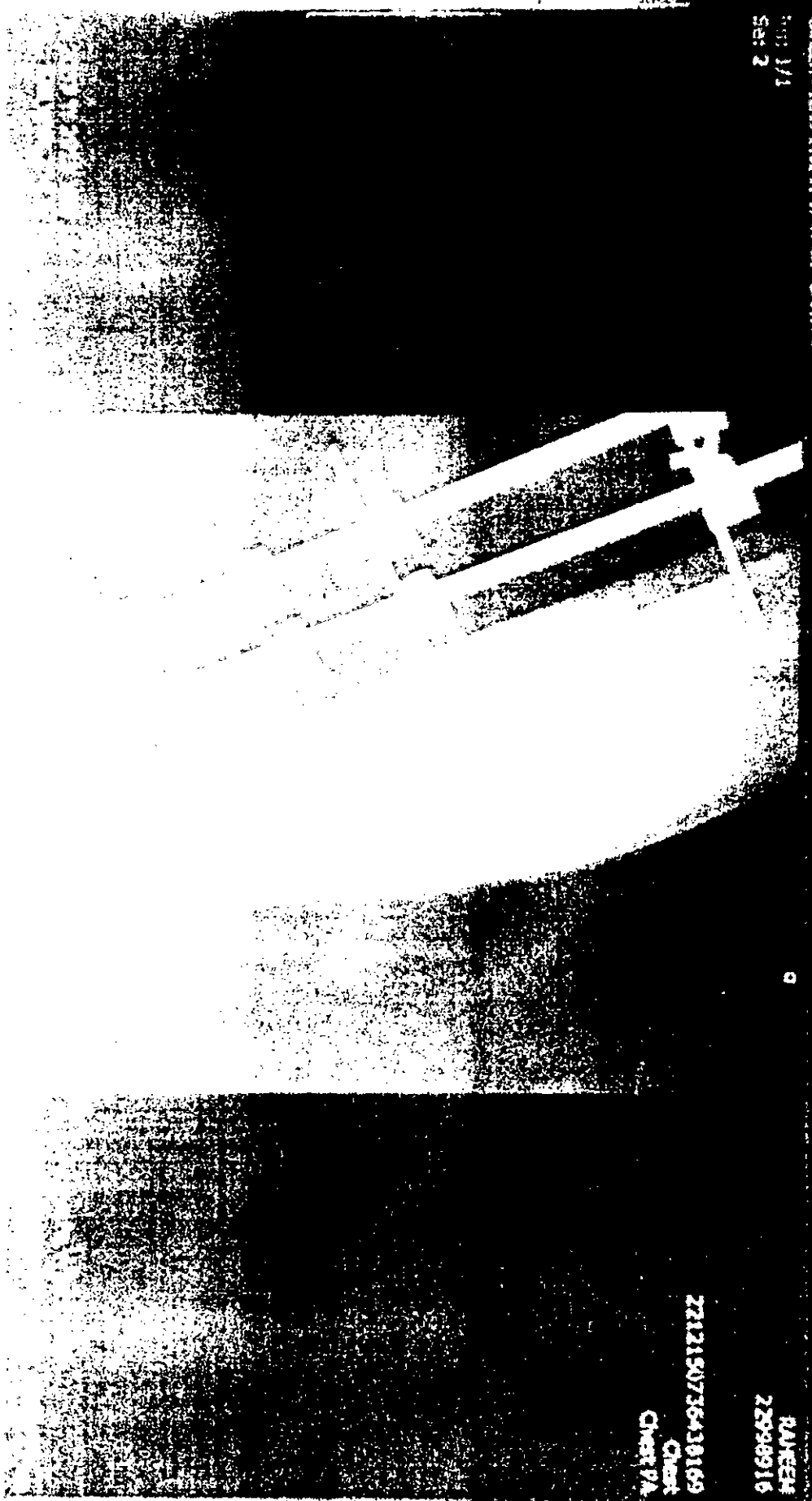
CHIEF - INVESTIGATION - CHEST VA

5/1/11

5/1/11

11/1/2011 11:00:41 AM
CHIEF
DR. J. JAMES

24






RAHEEM
22990916

2212190736410169
CHIEF
CHIEF VA

25



تہیت 50 روپے	66064			
ایڈوکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل/ایسوسی ایشن نمبر: BC 10-7924		بعدالت جناب: سر جسٹس		
رابطہ نمبر: 0302-5990617				

منجانب: <u>مہربان</u>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
باعث تحریر آگے	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام کیلئے صادرہ سماں/مقدمہ/جھڑا/مختارہ کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف 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 یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل باجزدی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سببختہ پر داخلہ 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



الرقوم:

مقام: پشاور

BC-10-7924

17301-1496065

0345-940558

نوٹ: اس وکالت نامہ کی ذمہ داری ناقابل قبول ہوتی ہے

Handwritten signatures and stamps at the bottom of the page.