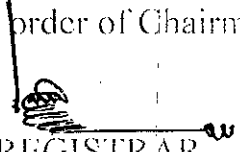


FORM OF ORDER SHEET

Court of _____

Case No.- _____

728/2023

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 31/03/2023 | <p>The appeal of Dr. Muhammad Javed presented today by Mr. Muhammad Arif Jan 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 style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p> |

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 728 /2023.

Dr. Muhammad Javed.....Appellant

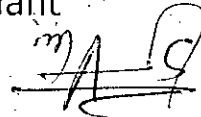
VERSUS

Government of Khyber Pakhtunkhwa,
through Chief Secretary and others.....Respondents

I N D E X

| S.No. | Description of documents. | Annexure | Dated |
|-------|--|----------|-------|
| 1. | Service Appeal | | 1-6 |
| 2. | Addresses of parties | | 7 |
| 3. | Copies of Notifications dated 09-07-2010 & 31-01-2011 | A & B | 8-9 |
| 4. | Copies of Medical Board and arrival report | C & D | 10-12 |
| 5. | Copy of letter dated 13-09-2011 | E | 13 |
| 6. | Copies of letters of militants with clipping of newspapers, leave application and arrival report | F | 14-21 |
| 7. | Copy of letter dated 26.07.2016 | G | 22-23 |
| 8. | Copy of application dated 08-11-2016 | H | 24 |
| 9. | Copies of letter dated 11-02-2022 along with necessary documents | I | 25-37 |
| 10. | Copy of departmental appeal | J | 38-39 |
| 11. | Wakalatnama | | 40 |

Appellant
Through



Muhammad Arif Jan
Advocate High Court
Cell: 0333-2212213

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 728 /2023.

Dr. Muhammad Javed Senior Registrar Department of
Medicine Gajju Khan Medical College/Bacha Khan
Medical Complex, Swabi.

.....Appellant

VERSUS

- 1) Government of Khyber Pakhtunkhwa, Through Chief
Secretary, Civil Secretariat, Peshawar.
- 2) Secretary Health, Khyber Pakhtunkhwa, Health
Department Civil Secretariat, Peshawar.
- 3) Dean, Khyber Girls Medical College, Peshawar.
- 4) Dean, Gujji Khan Medical College/ Bacha Khan
Medical Complex, Swabi.

.....Respondents

**SERVICE APPEAL U/S 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974.**

Respectfully Sheweth:-

- 1) That the appellant hails from a respectable family of District Khyber.
- 2) That the appellant was initially appointed as Medical Officer on contract basis on 29-11-1995 and then was regularized in the year, 1997.
- 3) That the appellant was then appointed as Senior Registrar (BPS-18) through public service commission KP on 30-06-2009 and was posted at Khyber Girls Medical College, Peshawar (Respondent No-3).
- 4) That all of sudden, the appellant suffered from depressive episode due to different stresses thus requested for medical leave which was granted vide Notification dated 09-07-2010 which was further extended for 180 days effecting from 20-01-2011. (Copies of Notifications dated 09-07-2010 & 31-01-2011 are attached as ANNEX-A & B respectively).
- 5) That the appellant was declared fit to resume his duties by the Medical Board on 07-04-2011 thus hereby submitted his arrival report on 08-04-2011. (Copies of Medical Board and arrival report are attached as ANNEX-C & D respectively).

- 6) That services of the appellant were surrendered in the 32 meeting of Management Council to the Health Department vide letter dated 13-09-2011. (Copy of letter dated 13-09-2011 is attached as ANNEX-E).
- 7) That due to law and order situation, fear and terror in the area and receiving the life threats from the militants, the appellant was unable to keep and continue his duties, thus in the compelling situation requested for grant of earned leave of about 16 years of served service thus the appellant proceeded and submitted arrival report on 17-05-2016 when the circumstances were normal. (Copies of letters of militants with clipping of newspapers, leave application and arrival report are attached as ANNEX-F).
- 8) That respondent No-3 vide his office letter dated 26-07-2016 submitted the arrival report of the appellant for future services before respondent No-2. (Copy of letter dated 26-07-2016 is attached as ANNEX-G).
- 9) That then the appellant submitted adjustment of service and release of salaries application before respondent No-2 on 08-11-2016. (Copy of application dated 08-11-2016 is attached as ANNEX-H).
- 10) That the appellant was then approved three years extra ordinary leave for training in Hepatology on the requisition of Director Liver Transplant to join

Quaid e Azam International Hospital, Islamabad and upon completion, the appellant resumed duties before respondent No-4 on 16-05-2021.

- 11) That to improve skills, the appellant was granted extra ordinary leave without pay on 11-02-2022 till 17-10-2022 and then the appellant resumed duties before respondent No-4.(Copies of letter dated 11-02-2022 along with other documents are attached as ANNEX-I).
- 12) That the appellant then filed departmental representation before respondent No-1 but the same has not been decided within the stipulated period of time. (Copy of Departmental representation is attached as ANNEX-J).
- 13) That appellant now approaches this Hon'ble Tribunal on the following grounds:-

GROUND

A. Because the act, commission and omission of the respondents by way of not regularizing the extra ordinary leave without pay into leave with pay and further impugned the act, commission and omission of respondents by way of depriving the appellant from seniority, promotion, increments, up-gradation with all other service benefits is patently illegal, unlawful, without lawful authority, against the law, rules and regulation governing the subject matter, thus invites consideration of this Hon'ble Tribunal.

5

- B. Because the appellant has not been treated in accordance with law and rules more so the respondent violated the procedure set forth.
- C. Because the law as well as the dictums of the superior courts is very much clear in the point which favor the appellant event the period leave without pay, the appellant improved his qualification, gained rich experience and earned good name which is evident from the attached record.
- D. That as per revised leave rules, the appellant is entitled to be granted leave as the appellant did served for more than 20 years of service into his credit.
- E. Because the respondents are/ were bound down under the law to disposed-of the departmental representation, but of no avail which establishing the mala-fide of the respondents, thus this act of the respondents is amounts to abuse of law.
- F. That any other ground which has not been specifically mentioned will be agitated at the time of arguments with kind permission of this hon'ble Tribunal.

It is, therefore, humbly prayed that, on acceptance of the instant appeal may be pleased to;

6

- i. Fixation of pay to the extent of basic pay scale with all increments and other service benefits.
- ii. Prepare the seniority list and promote the appellant being qualified, eligible and entitled in all respect to BPS-19 along with all back benefits.
- iii. Convert the extra ordinary leave without pay into earned leave and Count the extra ordinary leave without pay towards regular service for the purpose of pension and pensionary benefits.
- iv. Any other relief may also kindly be granted in the circumstances of the appellant's case.

Muhammad

Appellant

Through

Muhammad Arif Jan

Muhammad Arif Jan
Advocate High Court

AFFIDAVIT

I, Dr. Muhammad Javed Senior Registrar Department of Medicine Gajju Khan Medical College/Bacha Khan Medical Complex, Swabi (Appellant), do hereby affirm and declare on oath that the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

Muhammad

Deponent

REGISTERED
13/11/2017
Muhammad

(7)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. _____/2023.

Dr. Muhammad Javed.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa,
through Chief Secretary and others.....Respondents

ADDRESSES OF PARTIES

APPELLANT

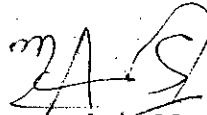
Dr. Muhammad Javed Senior Registrar Department of
Medicine Gujju Khan Medical College/Bacha Khan
Medical Complex, Swabi.

RESPONDENTS

1. Government of Khyber Pakhtunkhwa, Through
Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary Health, Khyber Pakhtunkhwa, Health
Department Civil Secretariat, Peshawar.
3. Dean, Khyber Girls Medical College, Peshawar.
4. Dean, Gujji Khan Medical College, Swabi.

Appellant

Through



Muhammad Arif Jan
Advocate High Court

8

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

A

Dated Peshawar the 9th July 2010. *Amended*

NOTIFICATION

No.SOH-I/1-538/07. Sanction is hereby accorded to the grant of One hundred and eighty (180) days leave (with full pay) on medical grounds in favour of Dr. Muhammad Javed, Senior Registrar Medicine (BS-18), Khyber Girls Medical College/HMC Peshawar with immediate effect.

Secretary Health,
Khyber Pakhtunkhwa

Endst No and date even.

C.C

1. Principal Khyber Girls Medical College, Peshawar.
2. Chief Executive, HMC, Peshawar.
3. Accountant General, Khyber Pakhtunkhwa, Peshawar.
4. Director Finance KGMC/HMC, Peshawar.
5. Doctor concerned.
6. Personal file of the doctor concerned.

(Maqbool Khan Khattak)
Section Officer-I

ATTESTED

ATTESTED

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 31st Jan; 2010.

NOTIFICATION

No.SOH-I/1-538/07. Consequent upon expiry of leave granted on medical grounds vide this department's Notification of even No dated 9th July, 2010, sanction is hereby accorded in the extension of leave for a further period of one hundred and eighty (180) days (with full pay) w.e.f 20th Jan; 2011 in favour of Dr. Muhammad Javed, Senior Registrar Medicine (BS-18), Khyber Girls Medical College/HMC Peshawar.

Secretary Health
Khyber Pakhtunkhwa

Endst:No and date even

- C.C
1. Principal Khyber Girls Medical College, Peshawar.
 2. Chief Executive, HMC, Peshawar.
 3. Accountant General, Khyber Pakhtunkhwa, Peshawar.
 4. Director Finance KGMC/HMC, Peshawar.
 5. ✓ Doctor concerned.
 6. Personal file of the doctor concerned.

Maqbool Khan Khattak
Section Officer-I

ATTESTED

ATTESTED

No. 249 /SMB/MS

Dated Peshawar the 02

10
Annex-C

From:

The Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital
Peshawar.

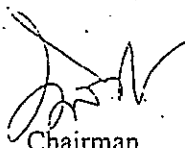
To,

The Chief Executive
Hayat Abad Medical Complex,
Peshawar

Subject
MEMO:-

STANDING MEDICAL BOARD

Dr. Muhammad Javed SR HMC Peshawar was examined by the Standing Medical Board held in this office on 07/04/2011. The proceedings of the Standing Medical Board are sent herewith for further necessary action.



Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital
Peshawar.

No. _____ /MS/SMB,

Copy forwarded to the:-

1:- Section Officer-I Govt. of Khyber Puktunkhwa Health Department for information w/r to his letter No./SOH/HD/1-538/09 dated 18.03.2011.

Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital
Peshawar.

ATTESTED

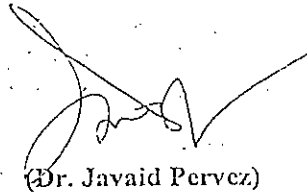
(11)

OFFICE OF THE CHAIRMAN STANDING MEDICAL BOARD/MEDICAL SUPERINTENDENT POLICE/SERVICES, HOSPITAL, PESHAWAR.

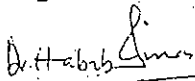
The Standing Medical Board comprising the following members assembled in the office of the Medical Superintendent Police/Services, Hospital, Peshawar to examine, Dr. Muhammad Javed Senior Registrar KGMC/HMC, Peshawar.

The Standing Medical Board is of the opinion that Dr. Muhammad Javed SR HMC, Peshawar who had suffered from depressive episode due to different stresses, has responded to treatment and he is now fit to resume his duty.

Station Peshawar:-
Dated: -07/04/2011.



(Dr. Javaid Pervez)
Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital,
Peshawar.



Medical Superintendent
Govt: Sarhad Hospital, Peshawar for
Psychiatric Disease Hospital, Peshawar.



(Dr. Muhammad Idress)
Psychiatrist
Khyber Teaching Hospital
Peshawar. Member....

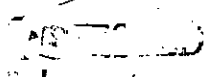


(Dr. Muhammad Tariq)
Psychiatrist Govt: Sarhad Hospital,
Peshawar. Member.



(Dr. Said Amin)
Physician
Police/Services, Hospital Peshawar


ATTESTED



Annex-D

12

To

The Chief Executive,
HMC, Peshawar.

SUBJECT:- ARRIVAL REPORT


Respectfully stated that I have been granted 180 days leave on medical ground by the Health Department which was subsequently extended to one year vide Health Department Notification dated 31/1/2010.

However, before expiry of the leave I appeared before Standing Medical Board for medical examination and was found fit to resume my duties vide Standing Medical Board letter dated 8/4/2011 (copy attached).

Therefore, I hereby submit my arrival report for duty to-day on 8th April 2011.

Yours faithfully,

Encl: As above


(Dr. Muhammad Javed)
Senior Registrar Medicine
KGMC/HMC, Peshawar.

Copy to:-

Secretary Health, Khyber Pakhtunkhwa, Peshawar.

~~ATTESTED~~



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No.SOH-I/HD/1-538/2009
DATED PESH: THE 13TH SEPT; 2011

13
Date
14/9/11

Annex - E

To

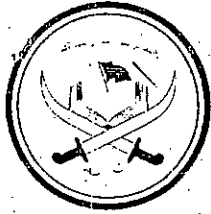
1. The Chief Executive,
HMC, Peshawar.
2. The Principal,
Khyber Girls Medical College,
Peshawar.

SUBJECT:- DECISION OF 32ND MEETING OF MANAGEMENT COUNCIL

I am directed to refer to your letter No.10435/HMC dated 5/7/2011 on the above subject and to state that decision with regard to surrendering of services of Dr. Saeed-ur-Rehman, Associate Professor Pathology and Dr. Muhammad Javed, Senior Registrar Medicine, KGMC to Health Department may be reviewed and their assignment be entrusted to other doctors/professors, through internal arrangement.

24
(Hamid Ali)
Section Officer:-

ATTESTED



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

(۱۱)

بازہ خیبر ایجنسی

شکر اسلام



تاریخ ۰۹/۰۲/۲۰۱۵ء

نمبر 678

سما ڈاکٹر جمادیدہ امجدی

شکر اسلام کی طرف سے اطلاع دی جاتی ہے کہ

تم حکومت میں سروس پر ہو۔ اور گمراہ حکومت کی خدمت

کرتے ہو۔ لہذا آپ کو مطلع کیا جاتا ہے کہ فوراً

پوری سے دستبردار ہو جاؤ ورنہ آپ کا حشر

ہی آپ کے دوسرے رشتہ داروں اور حکومت کے

ملازموں کی طرح ہوگا۔

کمانڈر سید الہام

گماہیل
سید الہام

ATTESTED

(15)

تحریک لشکر اسلام

قوم اکائیل

تاریخ 26-12-2013

لشکر اسلام کی طرف سے اطلاع ہے کہ (قوم اکائیل) نے سیدتی خیل اور
نئے مرد خیل اور نئے سلطان خیل اور نئے سینڈل خیل سب جیوں میں
ڈاکٹر بیگم کو قتل کر دیا۔ 2014ء میں لشکر اسلام مدینہ منورہ میں شامیر باز
نے میں حالت بیگم کے

دستی قلم لکھا اور اس کا
= دستخط اور امین اکبر

تحریک لشکر اسلام پاکستان
کمانڈر امین اکبر آفریدی
Mob: 0322-2110641

امین اکبر 03085566897

05441337429

دستخط امین

ATTESTED

(16)

حضرت پندوں کا دورہ ہونے سے پاک ہو گیا اور ان دہات اسے دن کا دورہ پانچ روز کے اہتمام سے
کے مطابق شدت پندرہ خان کو کھڑے پاروں کی

(بقیہ 17 صفحہ 10)

2011/04/04

ترجمیلا ڈیم، عالی بینک کی 80 کروڑ ڈالر امداد کی یقین دہانی

ڈیم کی بجلی بنانے کی موجودہ استعداد چار ہزار میگا واٹ میں توسیع کی جائے گی

اسلام آباد (انٹرنیشنل) روزنامے نے ترجمیلا ڈیم کی ڈیم کو کھانے کی موجودہ استعداد چار ہزار میگا واٹ

امیدوار استعداد اور اس ڈیم کی تعمیر میں آئی کر ڈیوار کی میں توسیع کرنے کے لئے بینک نے ڈاؤن اور دولت
ڈیوار ہم کرنے کی یقین دہانی کرنا دیا ہے ترجمیلا
(بقیہ 13 صفحہ 10)

مازہ: شدت پسندوں نے ڈپنٹر کو اغوا کر لیا

پندرہ سالہ سوار شدت پسند طاؤز کلنگہ اکاشیل سے نو روپے کا اغوا کر لیا

پندرہ سالہ سوار شدت پسندوں نے اور وہاں پر پیش کرنے والے ایک ڈپنٹر اور نو روپے

ایک ڈپنٹر کو اغوا کر لیا اور اس کے روز شدت پسند ہونے حضرت خان کو اس کی نو روپے مال ہونے

پانچوں کے ذریعہ ان کے طاؤز کلنگہ اکاشیل آئے اسے ساتھ ساتھ ان کا ملوہ تمام کی جانب عمل کر دیا

ATTXSTED

اللہ ہی کیلئے ہیں مشرق و مغرب القرآن

DAILY MASHRIQ PESHAWAR

مشرق

پشاور اسلام آباد سیکرٹریٹ شائع ہونے والا کثیر الاشاعت قومی اخبار

ABC CERTIFIED

سلسل اشاعت کے 44 سال

جلد 44 جمعہ المبارک 17 رجب المرجب 1432ھ 17 جون 2011ء 3 ذی قعدت 10 روپے شمارہ 300

17

پشاور کے نام کی ہر سزا ہے۔

بقیہ جاسوسی کے الزام 49

عام جان سے اٹھ کر پشاور میں پوری لی کی اول لاش میں کام کرنا ہے اسے سکرپٹ ہندوں نے 5 بجے زخمی کر کے قریب ڈنچ کر کے لاش پڑانے میں بیگ لگی اور اس کی لاش کے قریب ایک گاڑی بیٹھ کر دیکھی گئی اور جاسوسی کرنے والوں کو بھی ایسا ہوگا۔

بقیہ محکمہ موسمیات 50

بالائی علاقوں میں فوجی دستوں کی بارشوں کا سلسلہ شروع ہو جانے لگا۔ موسمیات کے ترجمان نے اسے 'بی' کی کتا پکڑوں کوں کے بارے میں بتایا ہے۔ ہزاروں سال پہلے ہی، گوہر لالہ اور پشاور آڈیٹرز میں اس کے بارے میں کہا گیا ہے کہ 48 گھنٹوں کے دوران ہونے والی بارشوں کے ترجمان نے بتا دیا ہے کہ

جسٹس شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

صافی سلیم شہزاد کیس کے حقیقی کمیشن کا سربراہ بنانے سے قبل کوئی مشاورت نہیں کی گئی کسی جج کو کمیشن کا رکن یا سربراہ مقرر کرنا چیف جسٹس کا اختیار ہے جس کا تعلق

حکومت صحافیوں کے کندھوں پر بندوق رکھ کر نہ چلائے حکومت کو اجازت نہیں دیں گے کہ وہ کسی جج کو لے کر جج توڑ دے عام سہہ جج گنہگار

اسلام آباد (جند پورٹ) حکومت نے جسٹس شایق زبیر کی سربراہی میں کمیشن تشکیل دیا ہے جو سلیم شہزاد کی لاش اور اس کے شہداء کے تعلق کی تحقیقات کیلئے قائم ہوگا۔ حکومت کے جج کے واقعات کی تحقیق کرانہ کی نشاندہی اور مستقبل جسٹس شایق زبیر کی سربراہی میں جج کی انکوائری

(بقیہ 46 صفحہ 10)



جسٹس شایق زبیر کی سربراہی میں کمیشن کا سربراہ بنانے سے قبل کوئی مشاورت نہیں کی گئی کسی جج کو کمیشن کا رکن یا سربراہ مقرر کرنا چیف جسٹس کا اختیار ہے جس کا تعلق

ڈاکٹر اشرف امین الظواہری کو القاعدہ کا تیسرا براہ مقرر کر دیا گیا

اسلام آباد (جند پورٹ) ڈاکٹر اشرف امین الظواہری کو القاعدہ کا تیسرا براہ مقرر کر دیا گیا ہے۔ ان کی سربراہی میں جج کی انکوائری

(بقیہ 54 صفحہ 10)

صوبائی اسمبلی کے پیش سیکرٹری کے عہدہ پر مگرٹی کا تازہ حد

ایک درجن سے زائد متاثرہ افراد نے فیصلہ پر عملدرآمد روک دینے کا مطالبہ کر دیا ہے۔

(بقیہ 47 صفحہ 10)

انڈیا کی پارلیمنٹ میں شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

انڈیا کی پارلیمنٹ میں شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

(بقیہ 48 صفحہ 10)

جاسوسی کے الزام میں سکرپٹ ہندوں نے ملی فون ابھار کر ڈنچ کر دیا

پشاور (جند پورٹ) سکرپٹ ہندوں نے ملی فون ابھار کر ڈنچ کر دیا

(بقیہ 53 صفحہ 10)

پشاور میں شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

جاسوسی کے الزام میں سکرپٹ ہندوں نے ملی فون ابھار کر ڈنچ کر دیا

پشاور (جند پورٹ) سکرپٹ ہندوں نے ملی فون ابھار کر ڈنچ کر دیا

(بقیہ 49 صفحہ 10)

پشاور میں شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

پشاور میں شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

(بقیہ 51 صفحہ 10)

بالائی علاقوں میں بارشوں کا سلسلہ دور دراز میں شروع ہو جائیگا

اسلام آباد (۔ بی بی سی) شمالی علاقوں میں بارشوں کا سلسلہ دور دراز میں شروع ہو جائیگا

(بقیہ 50 صفحہ 10)

پشاور میں شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

پشاور میں شایق زبیر کی سربراہی میں کمیشن قائم صحافیوں کا دھرم ختم

(بقیہ 52 صفحہ 10)

ATTACHED

F

18

To

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

Subject: REQUEST FOR GRANT OF 730 DAYS LEAVE ON HALF PAY.

Dear Sir,

Respectfully it is stated that I have been serving in health department for the last 16 years, and at present working as Senior Registrar Khyber Girls Medical College / Hayatabad Medical Complex Peshawar for the last 02 years on regular basis being a selectee of Provincial Public Service Commission. As such I am considered as regular Civil Servant instead of being an employee of Management Council.

It is worth mentioning that due to my present domestic problems, it has become difficult for me to perform my duties and I am in need of Long Leave.

Therefore, it is requested that I may kindly be granted 730 days leave on half pay, being permissible to me under the revised leave rules 1981. Leave entitlement certificate showing 696 days leave account (on full pay) duly verified by the Accountant General Khyber Pakhtunkhwa, (copy thereof is enclosed herewith for ready reference).

Dear Huzefa Khan,
— item

The applicant is my close friend and has approached me to request you for directive for grant of long leave as requested. Plz issue directives to Secretary Huzefa Khan.

M. Javed
Yours Faithfully,
Dr. Mohammad Javed S/o Abdul Janan
Senior Registrar,
Khyber Girls Medical College Peshawar.

DS/So-II
Pl issue directive as directed by H.O. 1

[Signature]
Pso
28/3

ATTESTED

ATTESTED
f

19

APPLICATION FOR LEAVE

Notes: Item 1 to 9 must be filled in by all applicants. Item 10 applies only in the case of Government servants of B.P.S. 16 and above.

- 1. Name of applicant. *DR. MUHAMMAD JAVED SR*
- 2. Leave Rules applicable.
- 3. Post held. *ASSISTANT REGISTRAR*
- 4. Department or office. *INDEPENDENT PUBLIC PROVIDENT*
- 5. Pay. *137-15*
- 6. House Rent Allowance/Conveyance Allowance or other compensatory allowances drawn in the present post.
- 7. (a) Nature of leave applied for. *EARNED LEAVE*
 (b) Period of leave in days.
 (c) Date of commencement. *From the date of*
- 8. Particular Rule/Rules under which leave is admissible. *Dependent*
- 9. (a) Date of return from last leave.
 (b) Nature of leave.
 (c) Period of leave in days.
 Date *21/07/2010* Signature of applicant. *M. Javed*
- 10. Remarks and recommendation of the Controlling Officer.
- 11. Certified that leave applied for is admissible under Rule and necessary conditions are fulfilled.

- Date *No PR-9/Mad 9/112* Signature *at 27/3/2010*
- 12. Report of Audit Officer.
 Date *Certified that* Signature *686-days leave at*
 Designation *Dr. Muhammad Javed Sr.*
- 13. Orders of the sanctioning authority certifying that on the expiry of leave the applicant is likely to the same post. *The he Gentiles*
 (If the compensatory allowance being drawn by him.)
 Date *for Earned Leave of this date of avails* Signature
 Designation *under the Revised Leave Rules - 1981-*

(Initial)
Asstt. Registrar
A. G. WHITE, Registrar.

APPROVED



CHIEF MINISTER'S SECRETARIAT
KHYBER PAKHTUNKHWA
PESHAWAR

No. SO-II/CMS/KPK/1-1/2011/
Dated Peshawar the 13th April 2011

20
6035-49E

To

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

330 14/04/11

Subject:- REQUEST FOR GRANT OF 730 DAYS LEAVE ON HALF PAY

Dear Sir,

I am directed to forward herewith a copy of self contained application alongwith enclosure of Dr. Mohammad Javed Senior Registrar Department of Medicine Khyber Girls Medical College/HMC, Peshawar on the subject noted above. The Honorable Chief Minister, Khyber Pakhtunkhwa has desired that leave may be granted to him as per rules/policy under intimation to this Secretariat.

Encl: as above

Yours Faithfully,

(GUL ZAREEN)

SECTION OFFICER-II

Copy to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
2. PSO to Chief Minister, Khyber Pakhtunkhwa
3. Mr. Hunayat Ullah Mayar Ex-District Nazim Mardan

SECTION OFFICER-II

ATTESTED

To

The Secretary,

Govt. of Khyber Pakhtunkhwa,

Health Department.

SUBJECT :- ARRIVAL REPORT

Dear Sir,

Respectfully it is stated that I have served in Health Department for 16 years and before my leave I was working as Senior Registrar. Khyber Girls Medical College/Hayatabad Medical Complex Peshawar on regular basis being a selectee of the Provincial Public Service Commission. As such I am considered as regular Civil Servant instead of being an employee of Medical Teaching Institution.

It is further stated that I was granted 180 days leave on medical ground w.e.f 9th July 2010 and the same was further extended for further period of 180 days w.e.f 20th Jan 2011 (copies attached). After availing the leave in question, the Medical Board declared me fit for Govt. service (copy of medical board report is attached). Accordingly I resumed my duties at Khyber Girls Medical College/HMC, Peshawar.

Due to unavoidable circumstances, I could not continue my duty and applied for 730 days earned leave as per admissibility report of Accounts Office which was forwarded by The Chief Minister's Secretariat to the Health Department for sanction.

Since the circumstances were beyond my control and I presumed that my leave was sanctioned, therefore I proceeded on leave.

Now I want to join my duties and therefore kindly requested to accept my arrival at my previous position.

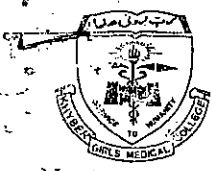
Sincerely yours,

Dr Muhammad Javed

Senior Registrar

Khyber Girls Medical College Peshawar

Dated 17/05/2016



OFFICE OF THE DEAN
KHYBER GIRLS MEDICAL COLLEGE, PESHAWAR
Govt. of Khyber Pakhtunkhwa, Health Department

Phones: +92 91 92 17 701

Fax: +92 91 92 17 702

Email: principal@kgmc.edu.pk



N
No. 6008/Estt./KGMC

Dated: 26/7/16

To

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

Subject: ARRIVAL REPORT OF DR. MUHAMMAD JAVED EX-SENIOR REGISTRAR BPS-18, KGMC PESHAWAR.

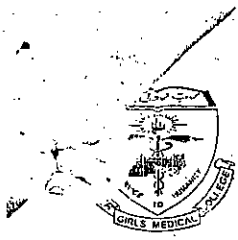
Memo:

Reference to the letter received in this office vide No. SOH/HD/1-538/09, dated 08-05-2016, regarding the arrival report of Dr. Muhammad Javed, Ex-Senior Registrar BPS-18 KGMC Peshawar, the following is the submission on behalf of KGMC regarding the case of the officer under reference.

1. The officer was granted 180 days leave (with full pay) on medical grounds vide No. SOH-I/1-538/07, dated 09-07-2010.
2. On expiry of this leave, he was given an extension of leave by the Health Department for another 180 days w.e.f. 20th January 2011 vide Notification No. SOH-I/1-538/07, dated 31-01-2011.
3. He later applied for the grant of 730 days leave on 12-05-2011 on half pay which was not processed in Health Department and never materialized.
4. The officer was asked to appear before the Standing Medical Board of Services/Police Hospital Peshawar for the verification of his illness and the Board after examination had submitted vide its report dated 07-04-2011 that he is fit to resume his duty. Consequently vide letter No. 2377/Estt./KGMC, dated 19-04-2011 the KGMC administration had requested to Health Department to cancel the remaining period of Earned Leaves on medical grounds in respect of Dr. Muhammad Javed.

P.D.A Building, Block # IV, Phase-V, Hayatabad Peshawar

ATTACHED



OFFICE OF THE DEAN
KHYBER GIRLS MEDICAL COLLEGE, PESHAWAR
Govt. of Khyber Pakhtunkhwa, Health Department

Phones: +92 91 92 17 701

Fax: +92 91 92 17 702



Email: principal@kgmc.edu.pk

No. _____/Estt./KGMC

Dated: 26/7/2016

5. The case of Dr. Muhammad Javed was taken up on agenda in the 32nd meeting of Management Council of HMC Hayatabad dated 07-06-2011 and reference to the Minutes of this meeting, the college administration had surrendered the services of Dr. Muhammad Javed to the Health Department vide letter No. 4183/Estt./KGMC, dated 30-06-2011.

From the above submissions it is clearly evident that Dr. Muhammad Javed is no more an employee of KGMC/HMC as his services have already been handed over to Health Department on 30-06-2011, the college thereafter has no record of his services.

It is therefore requested to take up the case of Dr. Muhammad Javed on your own level and to decide about the future services of the officer at appropriate place under the Civil Services of Health Department Govt. of Khyber Pakhtunkhwa Peshawar.

No. _____/Estt./KGMC

[Signature]
DEAN
Khyber Girls Medical College,
Peshawar.

Copy forwarded to:

1. The Chairman Board of Governors, MTI HMC Peshawar.
2. The Medical Director, MTI HMC Peshawar.
3. Hospital Director, MTI HMC Peshawar.

/
DEAN
Khyber Girls Medical College,
Peshawar.

P.D.A Building, Block # IV, Phase-V, Hayatabad Peshawar

~~RESTRICTED~~

Annex - H

24

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

Subject: **ADJUSTMENT OF SERVICE & PAYMENT OF SALARIES.**

Respected Sir,

I have served in Health Department for many years and before my leave I was working as Senior Registrar, Khyber Girls Medical College / Hayatabad Medical Complex, Peshawar on regular basis being a selectee of the Provincial Public Service Commission, as such I am considered as Regular Civil Servant instead of being an employee of Medical Teaching Institution.

After availing a long leave I submitted my arrival report to the Health Department on 17.05.2016.

My arrival report was forwarded to the Khyber Girls Medical College, Peshawar on 08.06.2016 vide Letter No. SOH-1/HD/1-538/09, but till date no posting / adjustment of my services has been made.

Therefore, kindly requested that I may kindly be posted / adjusted on my previous position and also my salaries be released.

Yours Obediently,

Dr. Muhammad Javed

Dr. Muhammad Javed
Senior Registrar
Khyber Girls Medical College,
Peshawar

Dated: 08.11.2016

ATTEN

ATTEN



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar, the 11th February, 2022

NOTIFICATION

NO. SOH-I/HD/1-538/2009/DR. MUHAMMAD JAVED: Sanction is hereby accorded to the grant of 365-days (Three hundred and sixty five days) Ex-Pakistan Leave (leave without pay) in respect of Dr. Muhammad Javed, Senior Registrar, (BS-18) attached to Gajju Khan Medical College/ Bacha Khan Medical Complex, Swabi from the date of availing (but not more than fifteen (15) days from the issuance of this notification).

- 2- On expiry of the said leave the officer shall report to Director General Health Services, Khyber Pakhtunkhwa.
3. Health Department Khyber Pakhtunkhwa has no objection on proceeding abroad of the doctor concerned during the leave period

SD/-

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

ENDST. NO AND DATE EVEN

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa.
2. The Director General Health Services, Khyber Pakhtunkhwa.
3. Dean/CEO GKMC/BKMC Swabi w/r to his letter F.No.2-7 Health Department/MTI/GKMC/BKMC/Swabi 25884-89 dated 29.12.2021.
4. District Account Officer, Swabi.
5. PS to Secretary Health, Khyber Pakhtunkhwa, Peshawar.
6. PS to Special Secretary (E&A), Health Department, Peshawar.
7. Doctor Concerned.
8. Master file.

SECTION OFFICER (E-I)

ATTESTED



76

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: the 28th May 2017

NOTIFICATION

No.SOH-I/HD/1-538/09 Ex-post facto sanction is hereby accorded for grant of extra ordinary leave without pay in respect of Dr. Muhammad Javed, Senior Registrar Medicine (BS-18), Khyber Girls Medical College, Peshawar w.e.f 9/4/2011 to 16/5/2016.

2. Consequently, Dr. Muhammad Javed Senior Registrar Medicine (BS-18) is hereby posted at Gajju Khan Medical College, Swabi for adjustment against any vacant post in equivalent scale with immediate effect.

Secretary Health

Endst No and date even

C.C

1. Medical Director, HMC Peshawar.
2. Dean Khyber Girls Medical College, Peshawar.
3. Principal Gajju Khan Medical College, Swabi.
4. Section Officer (Lit-II) Health Department
5. District Accounts Officer, Swabi.
6. Doctor concerned.

Self
Section Officer-I

ATTESTED

27

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT



DATED PESH: THE 13TH JUNE 2017

NOTIFICATION

No. SOH-I/HD/1-538/09 In terms of Rule 2.11 of the Khyber Pakhtunkhwa Civil Servants Pension Rules the period of absence w.e.f 9/4/2011 to 16/5/2016 in respect of Dr. Muhammad Javed, Senior Registrar Medicine (BS-18), Khyber Girls Medical College, Peshawar is hereby commuted retrospectively into Extra Ordinary leave (without pay).

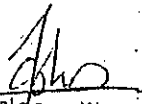
2. Consequently, Dr. Muhammad Javed, Senior Registrar Medicine (BS-18) is hereby posted at Gajju Khan Medical College, Swabi for adjustment against any vacant post in equivalent scale with immediate effect.

SECRETARY HEALTH

Endst No and date even

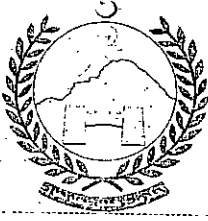
C.C

1. Medical Director HMC, Peshawar.
2. Dean Khyber Girls Medical College, Peshawar.
3. Principal Gajju Khan Medical College, Swabi.
4. Registrar Services Tribunal, Peshawar.
5. Section Officer (Lit-II) Health Department w/r to Service Appeal No.223/2017.
6. Distt: Accounts Officer, Swabi.
7. PS to Secretary Health Department.
8. Doctor concerned.
9. Personal file of the doctor concerned.


(Taslem Khan)
Section Officer-I

ATTACHED

28



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

DATED PESH: THE 11TH MAY 2018

NOTIFICATION

No.SOH-I/HD/1-538/09 Sanction is hereby accorded to the grant of Three hundred and sixty five (365) days extra ordinary leave (without pāy) with effect from the date of availing (should effect within 15 days after issuance of the order) in favour of Dr. Muhammad Javed, Senior Registrar Medicine (BS-18), Gajju Khan Medical College, Swabi.


2. Certified that on expiry of leave the officer concerned will resume duty against his original post.

SECRETARY HEALTH

Endst No.and date even

C.C

1. Chief Executive/Principal Gajju Khan Medical College and Bacha Khan Medical Complex, Swabi.
2. Medical Supdt; Bacha Khan Medical Complex, Swabi.
3. Distt: Accounts Officer, Swabi.
4. Doctor concerned.
5. Personal file of the doctor concerned.


(Tasleem Khan)
Section Officer-I

ATTESTED



قائد اعظم انٹرنیشنل ہسپتال - اسلام آباد

Quaid-e-Azam International Hospital, Islamabad.

Near Golra Morr, Adjacent Froebel's School,
Peshawar Road, Islamabad.
Tel: 051-8449100
Fax: 051-2315159

29

Dr. Najmul Hassan Shah
Consultant Hepatologist / Gastroenterologist
&
Director Liver Transplant Program

March 01, 2018

To,

Dr Muhammad Javed
Senior Registrar
Department of Medicine
Gajju Khan Medical College Swabi

Subject: Selection as Transplant Hepatologist

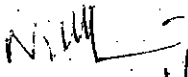
Dear Dr. Javed

Thank you for applying for the post of a Transplant Hepatologist at Hepatology & Liver Transplantation Department at Quaid-e-Azam International Hospital, Islamabad.

We are pleased to offer you the post for a term of three years with annual appraisal and review subject to satisfactory progress.

You will be signing a formal contract to govern the financial rewards for the post in consultation with the Director Liver Transplant in accordance with your assigned duties after mutual agreement.

Looking forward to work with you


Dr. Najmul Hassan Shah
Director Liver Transplant Program

Dr. Najmul Hassan Shah
Consultant Hepatologist - Gastroenterologist
Director Hepatology & Liver Transplant Program
Quaid-e-Azam International Hospital, Islamabad

ACCEPTED

March 22, 2018

To,
The Secretary Health,
Government of KPK
Peshawar Pakistan

30

Subject: **Extra Ordinary Leave without Pay for Liver Transplant Training**

Dear Sir,

I am applying for a period of three years **Extra Ordinary Leave Without Pay** to undertake hands on training as Consultant Hepatologist at Hepatology & Liver Transplant Department at Quaid-e-Azam International Hospitals, Islamabad.

This opportunity to get hands on training as Transplant Hepatologist is a rare distinction that would enable me to prepare myself for a role in the already planned Liver Transplant Program under the Khyber Medical University and Health Department in KPK.

I would be grateful for your kind appreciation of this opportunity and your attention and approval of this leave.


I am currently working as Senior Registrar at Bacha Khan Medical Complex and Gajju Khan Medical College Swabi.

Please acknowledge that I already hold the following qualifications.

1. **MBBS** 1992 from Khyber Medical College Peshawar Pakistan
2. **FCPS (Medicine)** 2003 from College of Physicians and Surgeons of Pakistan
3. **FCPS (Gastroenterology)** 2011 from College of Physicians and Surgeons of Pakistan
4. **MRCP** from Royal College of Physicians of Ireland 2013
5. **Specialty Certificate Examination in Gastroenterology** from Royal College of Physicians, UK 2014
6. **King Saud Advanced Hepatology Fellowship** King Saud University, Saudi Arabia 2015

I have done post graduate Hepatology Fellowship as above and this new experience is going to help in improve my credentials to work as Transplant Hepatologist under the Health Department in future.

Best wishes


Dr. Muhammad Javed
Senior Registrar
Department of Medicine
Gajju Khan Medical College, Swabi


ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

DATED PESH: THE 9TH JULY 2019

NOTIFICATION


No. SOH-I/HD/1-538/09 Sanction is hereby accorded to the extension in Extra Ordinary Leave granted vide this department notification of even No dated 11th May 2018 for further period of seven hundred and twenty (720) days in favour of Dr. Muhammad Javed, Senior Registrar Medicine (BS-18), Gajju Khan Medical College, Swabi for completion of undergoing training as Consultant Liver Transplant Hepatologist at Quaid-e-Azam International Hospital Islamabad.

2. Certified that on expiry of leave, the officer concerned will resume duty against his original post.

SECRETARY HEALTH

Endst No and date even

- C.C. to:-
1. Chief Executive/Principal Gajju Khan Medical College, Swabi.
 2. Medical Supdt; Bacha Khan Medical Complex, Swabi.
 3. Distt; Accounts Officer, Swabi.
 4. PS to Secretary Health Department.
 5. Doctor concerned.
 6. Personal file of the official concerned.


(Wasim Khan)
Section Officer-I

ATTEST



قائد اعظم انٹرنیشنل ہسپتال - اسلام آباد

Quaid-e-Azam International Hospital, Islamabad.

Near Golra Mori, Adjacent Froebis School,
Peshawar Road, Islamabad.
Tel: 051-8449100
Fax: 051-2315241

32

Dr. Najmul Hassan Shah

Consultant Hepatologist / Gastroenterologist
&
Director Liver Transplant Program

December 31, 2020

EXPERIENCE CERTIFICATE

This is to certify that **Dr. Muhammad Javed S/O Mr. Abdul Janan** holding CNIC No. 21201-1497369-1 has worked as "Consultant Gastroenterologist & Hepatologist" in Department of Hepatology and Liver Transplantation, Quaid-e-Azam International Hospital since March 02, 2017 Till December 31st 2020.

During this time, he rendered all his roles and responsibilities with complete dedication and hard work.

Should you need any further information regarding Dr. Muhammad Javed, please feel free to contact us.

Thank You

NMS

Dr. Najam Ul Hassan Shah
Director Liver Transplant Program
Quaid-e-Azam International Hospital, Islamabad.

ATTESTED

Dr. Najmul Hassan Shah
Consultant Hepatologist & Gastroenterologist
Director Liver Transplant Program
Quaid-e-Azam International Hospital,
Islamabad



OUTSTANDING CARE
personally DELIVERED

33



**United Lincolnshire
Hospitals**
NHS Trust

Human Resources Department
Robey House
Lincoln County Hospital
Greetwell Road
Lincoln
LN2 5QY
Carla.Smith@ULH.NHS.UK

Tel: 01522 707227

3rd October 2022

To Whom It May Concern:

Please accept this letter as confirmation that Dr Muhammad Javed (NI: NJ285259D) was employed by United Lincolnshire Hospitals NHS Trust from 28th February 2022 to 15th September 2022.

Dr Javed was employed as a Consultant in Gastroenterology at Pilgrim Hospital, Boston, Lincolnshire. His employment was fixed term and full time at 40 hours per week. He had a basic annual salary of £99,425.00.


If you require any further information, please do not hesitate to contact me on the above telephone number.

Kind Regards,


Carla Smith

HR Operations Administrator
United Lincolnshire Hospitals NHS Trust

Human Resources
Dept ULHT
- 3 OCT 2022


AFFECTED



BRITISH SOCIETY OF GASTROENTEROLOGY

SECRET

The Federation of Royal Colleges of Physicians
of the United Kingdom

and
The British Society of Gastroenterology
certify that

Mohammad Javed

has successfully achieved the Specialty Certificate in

Gastroenterology

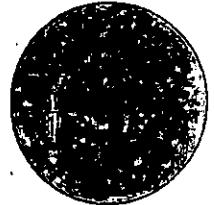
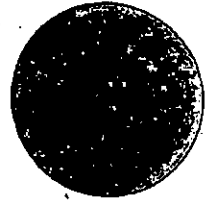
N. G. Lorimer
President
Royal College of Physicians
of Edinburgh.

David Summ
President
Royal College of Physicians
and Surgeons of Glasgow

J. C. L. [Signature]
President
Royal College of Physicians
of London

Jan O'Keefe
President
British Society of Gastroenterology

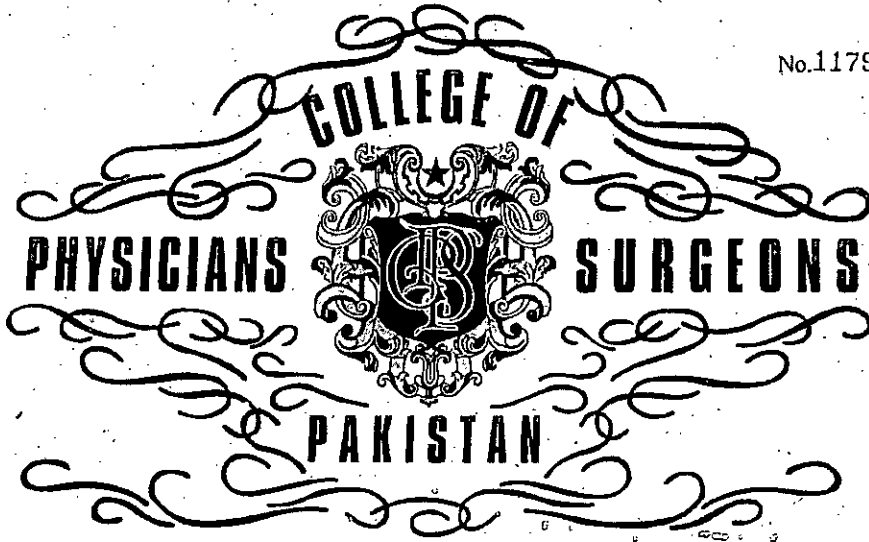
Dated this fifteen day of May 2012



34

35

No.11799



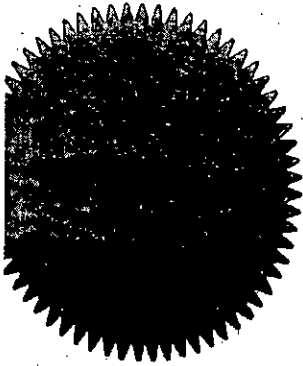
*Know all men by these Presents, that we the
President and Council of the College of Physicians
and Surgeons Pakistan admit*

Mohammad Javed

a Fellow of the College

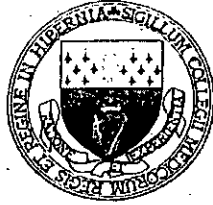
in the subject of Gastroenterology

*In witness thereof, we have subscribed our names
and caused the seal of the College to be hereunto
affixed this 4th day of June 2011*



*J. R. Prasad President
Member
Executive Committee
Registrar
of the College*

36



Royal College of Physicians of Ireland

We, the President and Fellows of the Royal College of Physicians of Ireland, in pursuance of the powers vested in us by our Charters and having duly and deliberately examined

Muhammad Javed

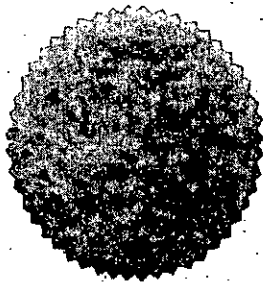
in the principles and practice of Medicine (General Medicine), and in the accessory sciences, and having found him well versed therein, do hereby grant him our Licence to practice in the Faculty of Medicine, do hereby also admit him to the Membership of the College and to the full enjoyment of all privileges and honours attached thereto, and do hereby certify that he is a Licentiate and Member of the said College.

In testimony whereof we subscribe our Names and affix our Common Seal at the College Hall in Dublin, this twenty-sixth day of July, 2013.

President *Shir Loun*

Fellow *John Dams*

Fellow & Registrar *Keith Murray*



APPROVED

King Saud University
Graduation Certificate



جامعة الملك سعود
وثيقة تخرج

In Accordance with the University Council decision,
Muhammad Jayed Abdul Janan
St. ID 436107913
has been awarded the degree of Fellowship in
Advanced Hepatology
from the College of Medicine
in session No. (7)
On 30-03-2016

بناءً على قرار مجلس الجامعة فإن :
محمد جافيد عبد ال جنان
الرقم الجامعي ٤٣٦١٠٧٩١٣
قد حصل على درجة الزمالة في تخصص امراض الكبد
من كلية الطب
وذلك بجلسته رقم (٧)
بتاريخ ١٤٣٧/٠٦/٢١ هـ .

عميد شؤون القبول والتسجيل
Dean of Admissions and Registration

د. ضالح بن مفلح آل صقر

Dr. Saleh Mufleh Al-sager

Date of Print: May 3, 2016 May 3, 2016 هـ ١٤٣٧/٠٧/٢٦ طبعت بتاريخ



To verify the information of this certificate visit : <http://verification.ksu.edu.sa> لتأكد من صحة بيانات الوثيقة نرجو زيارة الرابط

To,
The Chief Secretary,
Govt. of Khyber Pakhtunkhwa Peshawar.

(38)

Annex - J

Subject: **REGULARIZATION OF EXTRAORDINARY LEAVE (WITHOUT PAY) INTO LEAVE WITH HALF PAY PLUS BENEFITS AND UPGRADATION OF BASIC PAY SCALE.**

With due respect, it is stated that I am working as Senior Registrar in the Department of Medicine Gajju Khan Medical College/Bacha Khan Medical Complex Swabi. Initially I was appointed as Medical Officer in School Health Services Khyber Agency in 1995 on contract basis. My services were regularized through Public Service Commission in 1997. I worked in Health Department KPK on various posts till 2003, when I was selected as District Medical Specialist at Agency Headquarters Hospital Khyber Agency through Public Service Commission KPK.

Later on I was selected as Senior Registrar Medicine in Khyber Girls Medical College/ Hayatabad Medical Complex Peshawar in 2009 through Public Service Commission KPK. I left the country and joined as Associate Consultant King Khalid University Hospital Saudi Arabia due to very bad security conditions in my District Khyber and even threats to my personal life.

My service was regularized and period of absence was commuted into extraordinary leave without pay through Services Tribunal KPK from 9/4/2011 till 16/5/2016.

I started working in Gajju Khan Medical College Swabi on 17/5/2016. As I was trained in Hepatology and Liver Transplant, I joined Quaid e Azam International Hospital Islamabad on the requisition of Director Liver Transplant on 15/5/ 2018 after approval of three years' extraordinary leave. On completion of required training and experience I resumed charges in Gajju Khan Medical College Swabi on 16 /05/2021.

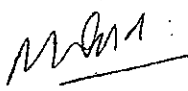
I went to England to further improve my skills on one-year extraordinary leave without pay on 25 /2/2022 and resumed my charge of duty early on 18/10/2022.

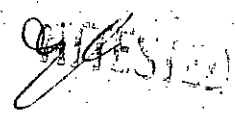
During this whole period (Extraordinary Leave) I improved my academic qualifications including FCPS in Medicine, FCPS in Gastroenterology, MRCP Ireland, SCE in Gastroenterology from UK and Fellowship in advanced Hepatology from King Saud University Saudi Arabia with distinction. At the same time, I learned and improved my skills including experience in Liver Transplantation. We performed about 200 liver Transplants in Quaid e Azam International Hospital Islamabad. I further improved my skills in Gastrointestinal endoscopy in England UK. At the same time, I earned and sent to Pakistan valuable foreign exchange as well.

Therefore, kindly requested that my extraordinary leave should be regularized and changed in to leave with half pay along with other benefits and increments. At the same time my Basic pay scale should be upgraded accordingly.

All relevant documents are attached.

Sincerely yours


Dr. Muhammad Javed
Senior Registrar
Department of Medicine
Gajju Khan Medical College/Bacha Khan Medical Complex Swabi
Dated: 01st Dec, 2022



(39)

PSIC S Khyber Pakhtunkhwa

Diary No: 3999 - VII E

Date: 02-11-2022

ATTESTED

(40)

WAKALATNAMA

BEFORE THE HONBLE KP Service Tribunal, Peshawar

Dr. Muhammad Jawad

Plaintiff(s)
Petitioner(s)
Complainant(s)

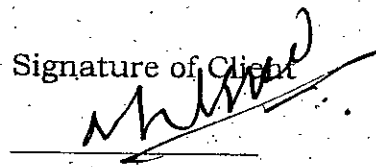
VERSUS

Gort. J. KP Golak

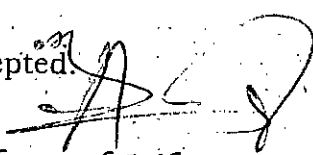
Defendant(s)
Respondent(s)
Accused(s)

By this, power-of-attorney I/we the said Dr. M. Jawad in the above case, do hereby constitute and appoint **MUHAMMAD ARIF JAN** Advocate as my attorney for me/us in my/our name and on my/our behalf to appear, plead, give statement, verify, administer oath and do all lawful act and things in connection with the said case on my/our behalf or with the execution of any decree or order passed in the case in my/our favour/ against which I/we shall be entitled or permitted to do myself/ourselves, and, in particular, shall be entitled to withdraw or compromise the case or refer it to arbitration or to agree to abide by the special oath of any person and to withdraw and receive documents and money from the Court or the opposite party and to sign proper receipts and discharges for the same and to engage and appoint any other pleader or pay him as his fee irrespective of my/our success or failure in case, provided that, if the case is heard at anyplace other than the usual place of sitting of the Court the pleader shall not bound to attend except on my agreeing to pay him a special fee to be settled between us.

Signature of Client



Accepted



Muhammad Arif Jan
Advocate High Court
Peshawar
Office No.210, Mumtaz Plaza
G.T Road, Hashtnagri Stop,
Peshawar City.
CNIC No.17201-2275748-7
Bc No.10-6663
Cell: 0333-2212213