

ORDER


13.09.2022

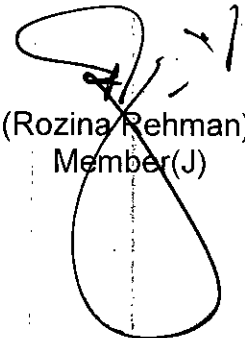
Nemo for appellant.

Asif Masood Ali Shah learned Deputy District Attorney for the respondents present.

Case was called time and again but neither the appellant nor her counsel turned up till rising of the Bench. Consequently, instant service appeal is hereby dismissed in default for non-prosecution. Parties are left to bear their own costs. File be consigned to the record room.

Announced.
13.09.2022


(Faresha Paul),
Member (E)



(Rozina Rehman)
Member(J)


03.06.2022

Junior to counsel for the appellant present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 21.06.2022 for arguments before D.B.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

21.06.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 28.06.2022 before the D.B.

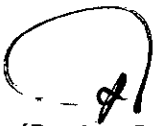

(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

28.06.2022

Learned counsel for the appellant present. Mr. Riaz Khan Paindakheil, Assistant Advocate General for respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not prepared the brief of the case. Adjourned. To come up for arguments on 13.09.2022 before the D.B.


(Rozina Rehman)
Member (J)


(Salah Ud Din)
Member (J)

[Redacted]

[Redacted]

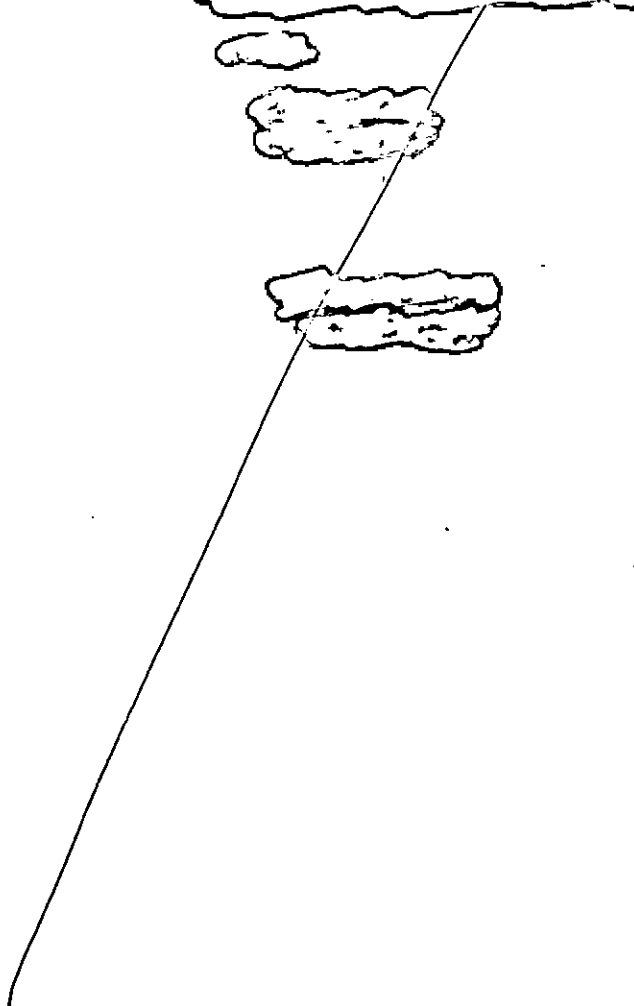
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[Redacted]

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7399/21

05.10.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Reply/comments have not been submitted despite extension of time. Last chance is given to the respondents for submission of reply within 10 days in office, failing which the right of the respondents for reply shall be deemed as struck off. To come up for arguments on 29.11.2021 before the D.B.



(Mian Muhammad)
Member(Executive)



Chairman

29.11.2021 Due to unavailability of DB, the case is adjourned to 03-01-2022.



Ami
Reader

03.01.2022

Junior to counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Dr. Ilyas Quershi, DMS, Safiullah, Focal Person and Jaffar Ali, Assistant for the respondents present.

Representatives of respondents submitted written reply/comments which are placed on file and copy of the same is handed over to the learned counsel for the appellant. To come up for rejoinder if any, and arguments before the D.B on 18.01.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

she alongwith her family is settled in Mansehra. He further contends that according to Para-vi of the said policy normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. Unless the element of public interest is shown in rebuttal to the appeal, the points raised at stage of preliminary hearing are arguable. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through proper application with sufficient cause, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 05.10.2021 before the D.B.

Appellant Deposited
Security & Process Fee
14/9/21

An application has been moved alongwith Memorandum of appeal seeking suspension of operation of impugned order till disposal of appeal. Notice of the application be given to the respondents. Operation of impugned order shall remain suspended till date fixed.


Chairman

S.A No. 7399/2021

14.09.2021 Counsel for the appellant present. Preliminary arguments heard.



The appellant is aggrieved from transfer order dated 04.08.2021 and purportedly communicated to her through whatsapp on 24.08.2021, against which she filed departmental appeal on 25.08.2021. According to Para ix of the Posting/Transfer Policy of the Provincial Government, right of appeal has been given to the government servants and accordingly, if one is aggrieved due to the orders of posting/transfer of authorities, he/she may seek remedy from the next higher authority/the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. It is further provided in the said Para that such appeal shall be disposed of within fifteen days. Obviously, the appellant after waiting for 15 days for outcome of her appeal has approached this Tribunal as next remedy through this Service appeal when she did not receive any response from the appellate authority. Learned counsel for the appellant contends that the appellant while posted as Charge Nurse in King Abdullah Teaching Hospital, Mansehra has been transferred to DHQ Hospital Karak by the impugned order. Learned counsel submits that there was no expediency for transfer of the appellant to a far-flung area from her native district i.e. Abbottabad and the transfer of the appellant does not serve any public interest rather it will result into agony for the appellant as

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7399 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/09/2021	<p>The appeal of Mst. Sumaira Bibi resubmitted today by Syed Noman Ali Bukhari 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,</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Miss. Sumaira Bibi Charge Nurse King Abdullah Teaching Hospital Manshera received today i.e. on 13.09.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-E and F of the appeal are illegible which may be replaced by legible/better one.
- 2- Check list is blank which may be filled up.

No. 1812 /S.T,

Dt. 13/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv. Pesh.

Sir,

all objection removed & file resubmitted.



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. _____/2021

Sumaira bibi

V/S

Health Deptt:

INDEX

S.N	Documents	Annexure	Page No.
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2.	Stay Application	-----	06-07
3.	Copy of nikah nama/idcard	A	08-10
4.	Copy of card of husband	B	11-12
5.	Copy of medical	C	13-31
6.	Copy of impugned transfer order	D	32
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Sumaira Bibi
APPELLANT
Sumaira Bibi

THROUGH:

Noman Ali Bukhari
(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

Appellant Deposited
Security & Process Fee

13.09.2021

25/9/21

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2021

Miss Sumaira Bibi D/o Ghazi Khan, Charge Nurse BPS-16,
King Abdullah Teaching Hospital, Mansehra.

(APPELLANT)

VERSUS

1. The Secretary to Govt, Health Deptt, KP, Peshawar.
2. The Director General health Services, KP, Peshawar.
3. The Medical Superintendent, King Abdullah Teaching Hospital,
Mansehra.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KP SERVICE
TRIBUNALS ACT, 1974 READ WITH CLAUSE XIV OF
POSTING TRANSFER POLICY, AGAINST THE
IMPUGNED TRANSFER ORDER DATED 04.08.2021,
COMMUNICATED TO THE APPELLANT THROUGH
WHATSAP ON 24.08.2021 AND ALSO AGAINST NOT
DECIDING THE APPEAL OF THE APPELLANT
WITHIN 15 DAYS AS PROVIDED UNDER CLAUSE XIV
OF THE POSTING TRANSFER POLICY.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL THE
ORDER DATED 04.08.2021 COMMUNICATED TO THE
APPELLANT THROUGH WHATSAP ON 24.08.2021,
MAY PLEASE BE SET ASIDE AND THE APPELLANT
MAY BE ALLOWED TO CONTINUE AS CHARGE
NURSE KING ABDULLAH TEACHING HOSPITAL,

(2)

MANSEHRA AS PRIOR TO THE ISSUANCE OF THE
IMPUGNED TRANSFER ORDER ON HUMANITARIAN
GROUNDS. ANY OTHER REMEDY WHICH THIS
AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE
THAT MAY ALSO BE AWARDED IN FAVOUR OF THE
APPELLANT.

RESPECTFULLY SHEWETH:
FACTS:

1. That the appellant was serving as Charge Nurse BPS-16 in health deptt and posted at King Abdullah Teaching Hospital, Mansehra.
2. That the appellant is resident of Mansehra and having domicile of Mansehra District and has been serving in King Abdullah Teaching Hospital, Mansehra with full zeal and zest, got the trust and respect of locals.
3. That the appellant is married having a minor daughter and husband of the appellant is out of country for the purpose of earning bread. The appellant is living with their family in laws in Mansehra. Further it is added that the appellant was suffering from Hyperthyroid and the treatment of the same is continue. Copy of Nikah nama, Husband card and medical is attached as annexure-A, B & C.
4. That, the appellant was now transferred without any reason from King Abdullah Teaching Hospital, Mansehra to DHQ Hospital Karak in violation of Posting Transfer policy vide order dated 04.08.2021 communicated to the appellant through whatsapp on 24.08.2021. (Copy of transfer order is attached annexure-D).
5. That the appellant feeling aggrieved from the impugned order dated 04.08.2021 communicated to the appellant through whatsapp on 24.08.2021, file departmental appeal on humanitarian grounds which was not decided within 15 days as provided under clause xiv of the posting transfer policy. Copy of departmental appeal is attached as annexure-E.
6. That the appellant has no other remedy but to come this august Tribunal on the basis of following grounds amongst others.

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GROUNDS:

- A. That the impugned order dated 04.08.2021 communicated to the appellant through whatsapp on 24.08.2021 is against the law, facts, norms of justice, violation of Govt: circulars, therefore not tenable and liable to be set aside.
- B. That the appellant is married and resident of district Mansehra. So, transfer of appellant, out of district is against the law, rules, policy and according to supreme court judgment and this Hon'ble Tribunal Judgment, further appellant also shall not be transferred on humanitarian ground, so the impugned order is liable to be set-aside. **copy of Policy is attached as annexure-F.**
- C. That the impugned order was passed in sheer negation of law rules, framed for the posting and transfer of married civil servants, in slipshod, perfunctory, arbitrary and clandestine manners thus liable to be set aside.
- D. That the appellant is married having a minor daughter and husband of the appellant is out of country for the purpose of earning bread. The appellant is living with their family in laws in Mansehra. Further it is added that the appellant was suffering from Hyperthyroid and the treatment of the same is continue. It is pertinent to mentioned here that the family in laws of the appellant not permit appellant for move to so far station and it is also difficult for the appellant to continue his job on Karak Station with her minor daughter. So on the humanitarian ground the order is not tenable in liable to be set-aside.
- E. That now a days, due to viral diseased all the country has lockdown public transport has closed and. so, there is no hurdle if the order was suspended till finalization of case.
- F. That this august Tribunal itself held in its judgment reported as 2012-PLC (CS) page-187 that transfer cannot be made on complaint/Administrative ground. The case of the appellant is same and is also entitled for the same relief.
- G. That the impugned transfer of the appellant has immensely affected the family life of the appellant. Being away from the family and children not only affected the mental health of the appellant but also troubled the life of children who needs the immediate presence and help of their mother being minor and ill. **Copy of medical is attached as annexure-G.**

- H. That not only the national laws and rules but also the international conventions like Universal Declaration of Human Right and International Covenant on Civil and Political Rights urge the promotion and protection of family life in order to guarantee a happy life to family. And the impugned transfer is contravening to these conventions to which Pakistan is a signatory.
- I. That, relevant law, rules and regulations have blatantly bypassed/ violated by the respondents and the relevant law, rules and regulations have never been taken into consideration by the respondents and thus the notification so passed by the respondents have no legal sanctity in the eyes of law.
- J. That, no solid, valid, concrete or confidence inspiring reasons/ justification has been given by the competent authority while transferring the appellant from King Abdullah Teaching Hospital, Mansehra.
- K. That, the impugned transfer order 04.08.2021 has neither been in the best interest of public service nor in exigencies of service, hence, not tenable and liable to be set aside.
- L. That, the impugned transfer order dated 04.08.2021 is nothing but to harass the appellant and to accommodate their blue eyed person.
- M. That, the impugned transfer order dated 09.07.2021 is violative of clause-I, IV and XIII of the transfer/ posting policy of the Government of Khyber Pakhtunkhwa as the appellant has been transferred from his current post.
- N. That, the powers or jurisdiction are vested in authority to exercise it justly, fairly, honestly, judiciously and in accordance with law, rules and regulations but the respondents have transgressed upon their powers while dealing with the matter in hand.
- O. That the impugned order is not a rational one and based on personal liking and disliking.
- P. That in the special circumstances of the case and due to urgency in the instant appeal being transfer matter the appeal of the appellant

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may be heard in the light of posting policy and order dated 03.06.2021 of this tribunal in appeal no.5338/2021.

Q. That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.

Sumaira Bibi
APPELLANT
Sumaira Bibi

THROUGH:

Noman Ali Bukhari
(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

[Signature]
DEPONENT

LIT. OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.

[Signature]
(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

(6)

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

Appeal No. _____/2021

Sumaira bibi

V/S

Health Deptt:

.....

**APPLICATION FOR SUSPENSION OF
OPERATION OF ORDER DATED 04.08.2021
OF APPELLANT TILL THE DISPOSAL OF
MAIN APPEAL.**

RESPECTFULLY SHEWETH:

1. That the appellant has filed an Appeal along-with application in which no date has been fixed so far.
2. That the appellant has good prime facie case and all the ingredients of stay is in favour of appellant.
3. That the grounds of main appeal may also be considered as integral part of this application.
4. That the vacancy of the appellant was still vacant and no other lecturer transfer in place of appellant so, if the order may be suspended creates no hurdle.
5. That the impugned order has passed on favoritism and nepotism and has been passed in-violation of Posting, Transfer Policy.
6. That the appellant was transferred out of district and the order dated 04.08.2021 is also in violation of policy for Female.

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7. That if the order dated 04.08.2021 is not suspended. Its not only badly effect the right of appellant but also creates hurdles for the appellant to performed her duties efficiently.
8. That now a days, due to viral disease all the country has lockdown public transport has closed. so, there is no hurdle if the order was suspended till finalization if case

It is, therefore, most humbly prayed that the order dated 04.08.2021 may be suspended till the disposal of main appeal. Any other remedy, which this august tribunal deems fit that may also be awarded in favour of appellant.

Sumaira Bibi
APPELLANT
Sumaira Bibi

THROUGH:

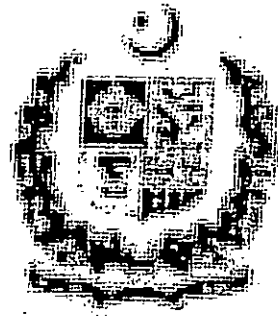
Noman Ali Bukhari
(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

AFFIDAVIT:

It is affirmed and declared that the contents of this Application are true and correct to the best of my knowledge and belief.

[Signature]
DEPONENT

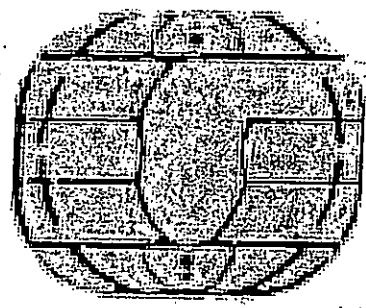
A 8



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name
Sumaira Bibi



Husband Name
Muhammad Rashid

سیرانی

Gender | Country of Stay
F | Pakistan

Identity Number | Date of Birth
13101-6784756-8 | 01.04.1987

Date of Issue | Date of Expiry
02.01.2019 | 02.01.2029

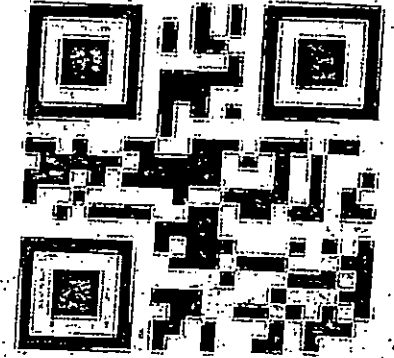


Holder's Signature



سرگودھا یونیورسٹی خورہ ڈاک خانہ جھنگلی، میانسرا

13101-6784756-8



سرگودھا یونیورسٹی خورہ ڈاک خانہ جھنگلی، میانسرا

سید محمد یونس
Secretary-General of Pakistan

101221336696

گمشدہ کارڈ ملنے پر قریبی لیڈیکس میں ڈال دیں

یونین کونسل شیروان تحصیل ضلع ایبٹ آباد

محکم خاندانی قوانین کے آرڈی نس بحریہ 1971ء (ششم 1971ء) کے تحت وضع کیے ہوئے قواعد و ضوابط کے تحت 18 نومبر 1971ء کے تحت اجلاس

قائم

نکاح نامہ

- ۱- دار و کانا نام شیروان کٹلان ناوان الامین تحصیل ایبٹ آباد شیروان اور ضلع ایبٹ آباد جس میں شادی کی ہے۔
- ۲- ذولہبا اور اس کے والد کا نام معدان کی سکونت بالترتیب { محمد راشد ولد محمد ارشد ساکن تھاغی ضلع مانسہرہ
- ۳- ذولہبا کی عمر 38 سال
- ۴- ذہن اور اس کے والد کا نام معدان کی سکونت بالترتیب { سکھیرا بی بی بنت غازی خان ساکن شیروان کٹلان
- ۵- آیا ذہن کنواری ہے یا بیعت یا مطلقہ کنواری
- ۶- ذہن کی عمر 25 سال
- ۷- اگر ذہن کی طرف سے کوئی وکیل مقرر کیا گیا ہے تو اس کا نام معد ولدیت و سکونت۔ { قدیر حسین ولد غازی خان ساکن شیروان کٹلان
- ۸- ذہن کے وکیل کے تقرر کے بارے میں گواہوں کے نام معد ولدیت و سکونت اور ان کی ذہن کے ساتھ رشتہ داری۔ { عبدالرحیم ولد عبدالرشید ساکن تھاغی خانہ عابد لوانز ولد نیاز محمد ساکن شیروان کٹلان قریبی عزیز
- ۹- اگر ذولہبا کی طرف سے کوئی وکیل مقرر کیا گیا ہے تو اس کا نام معد ولدیت و سکونت۔ { ذولہبا خود موجود ہے۔
- ۱۰- ذولہبا کے وکیل کے تقرر کے بارے میں گواہوں کے نام معد ولدیت و سکونت۔ { وقاص احمد ولد دوست محمد خان ساکن شیروان کٹلان احمد خان ولد فقیر محمد خان ساکن شیروان کٹلان
- ۱۱- شادی کے گواہوں کے نام معد ولدیت و سکونت۔
- ۱۲- شادی سرانجام پانے کی تاریخ 30-12-2012 (30 دسمبر 2012)
- ۱۳- مہر کی رقم سبلیہ (۱۰۰۰ روپے) سبلیہ مہر لکھنوی سے اور سبلیہ مہر سبلیہ مہر لکھنوی سے
- ۱۴- آیا مہر کا کچھ حصہ شادی کے موقع پر ادا کیا گیا اگر کیا گیا ہے تو کس قدر۔
- ۱۵- آیا پورے مہر یا اس کے کسی حصہ کے عوض میں کوئی جائیداد دی گئی ہے اگر دی گئی ہے تو اس جائیداد کی صراحت اور اس کی قیمت جو فریقین کے مابین طے پائی ہے۔
- ۱۶- خاص شرائط اگر کوئی ہوں۔

کیون و شیرو واضح تھا کہیں خورد میل مالسہرہ دولہن جو ہمہ کیا

۱۸۔ آیا شوہر نے طلاق کا حق بیوی کو تفویض کر دیا ہے۔
اگر کر دیا ہے تو کوئی شرائط کے تحت۔

۱۹۔ آیا شوہر کے طلاق کے حق پر کسی قسم کی پابندی
لاگائی گئی ہے۔

۲۰۔ آیا شوہر کی ایک ایسی چیز ہے جو وہ ان کے لئے
مستحق کوئی دستاویز جاری کی ہے یا کر سکتی ہے
تو اس کے مستعملہ رجاست۔

۲۱۔ آیا ذولہبا کے یہاں پہلے سے کوئی بیوی موجود ہے اگر ہے تو آیا اس
نے دوسری شادی کرنے کیلئے مسلم خاندانی ہے تو اس کے آرڈی میں
۱۹۶۱ء کے تحت عائلی کونسل سے اجازت نامہ حاصل کر لیا ہے۔

غیر تاریخ مراسلہ جس کے ذریعے عائلی کونسل نے ذولہبا کو
دوسری شادی کرنے کی اجازت دی ہے۔

30-12-2012

شادی کو درج رجسٹر کرانے کی تاریخ
فیس رجسٹریشن جو ادا کی گئی۔

ذولہبا کے وکیل کے تقریر کے گواہان کے دستخط

ایا اس کے وکیل کے دستخط

_____ (۱)

M. R. ...

_____ (۲)

ذہن کے وکیل کے دستخط

ذہن کے وکیل کے تقریر کے گواہان کے دستخط

_____ (۱)

_____ (۲)

نکاح خواں کے دستخط

نکاح رجسٹرار کے دستخط اور مہر

7. 11. 2012
نکاح رجسٹرار شیروان مہر

GDOM OF SAUDI ARABIA
ISTRY OF INTERIOR

هوية المقيم
RESIDENT IDENTITY

المملكة العربية السعودية
وزارة الداخلية

MUHAMMAD RASHID MUHAMMAD ARSHAD

محمد رشيد محمد ارشد

الرقم ٢٢٢٥٤٤٦٧٩٤ نسخة ٦

مكان الإصدار الهفوف

الإنهاء ١٤٤٢/٠٧/٠٤ المبتدأ ١٩٧٤/٠١/١٨

المهنة عامل معماري

الميلاد

الجنسية باكستان

رخصة العمل
المؤسسة الشرقية للتجارة

صاحب العمل

احمد يوحنا



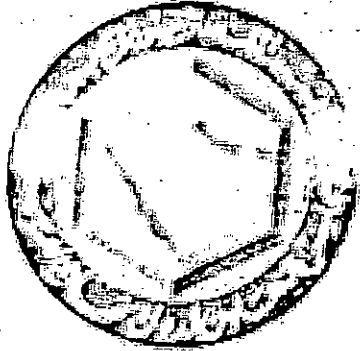
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Scanned with CamScanner

MINISTRY OF INTERIOR
DIRECTORATE OF PASSPORT DEPT.

هولبر الملتمة
RESIDENT IDENTITY

وزارة الداخلية
المديرية العامة للجوازات



Resident ID Card

This card is issued for legal resident as a proof of identity

Residence Card must be renewed separately before expiration

Residency ID card date of expiration can be checked Through

The MOI portal at

www.moi.gov.sa

يجب إشعار أقرب إدارة جوازات أو مركز شرطة عند فقدانها

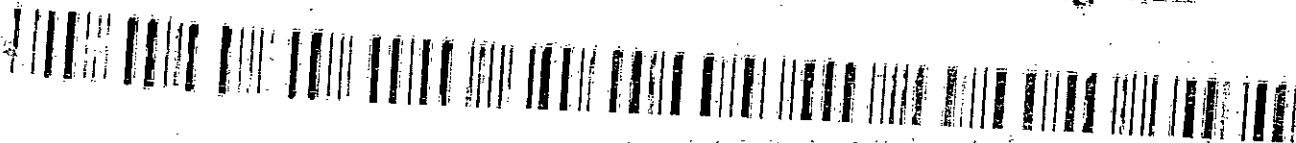
بطاقة إثبات هوية للمقيم

تصريف هذه البطاقة للمقيم نظامياً لإثبات الهوية

ويُلزم تجديد رخصة الإقامة بشكل مستقل قبل انتهائها

ويُمكن معرفة تاريخ انتهاء رخصة الإقامة عبر موقع

وزارة الداخلية.



SN 06003706136637

C

13



آغا خان یونیورسٹی ہسپتال، کراچی
The Aga Khan University Hospital, Karachi



ACCRI
EST. 1983

Near City Grade Station, Amin Colony GT
Road, Peshawar.
Tel: 091-2261547

Medical Record # : L23302088 (MS30295)
Patient Name : MRS. SUMAIRA
Specimen ID : 28112020; C19187R
Clinical Information / Comments:

Age / Gender : 32Y / Female
Location : MANSEHRA
Requesting Physician : MUHAMMAD AAM
Account # : C32258944 - OSP
Requested on : 28/11/2020 - 19:01
Collected on : 28/11/2020 - 19:01
Reported on : 01/12/2020 - 16:00

sdd2

Test	Current Result	Previous Results & Date	Unit
------	----------------	-------------------------	------

Test	Current Result	Previous Results & Date	Unit
(THYROID PROFILE)			
SERUM T3	0.63		nmol/l
Please note the change in reference ranges, effective from 14/6/2016.			
SERUM T4	1.60		ug/dl
RECHECKED:			
Please note the change in reference ranges, effective from 14/6/2016.			
SERUM TSH	117.700		uIU/ml
RECHECKED:			
AGE	RANGE uIU/ml		
Infant (0-28 weeks)	0.7---27.0		
Child (29 weeks - 17 years)	2.3---13.2		
Birth-4 days	1.0---39.0		
5 weeks-28 weeks	1.7---9.1		
29 weeks-20 years	0.7---8.4		
ADULTS			
21-54 years	0.4---4.2		
55-89 years	0.5---8.5		
PLEASE NOTE THE CHANGE IN REFERENCE RANGES.			

This is a computer generated report therefore does not require any signature
Printed on by 02/12/2020 01:04 PM / asif.yaqoob

Dr. Ayana Habib Khan
MBBS, FCP (Chemical Pathology)
Associate Professor

Dr. Farooq Ghani
MBBS, PhD (Douton University)
Associate Professor

Dr. Inam Biddiqui
MBBS, FCP (Chemical Pathology),
FRCR (Edn)
Professor

14

نمبره لیبارٹری

MANSEHRA LABORATORY

Opp. King Abdullah Teaching Hospital, MANSEHRA
☎ 0997-306663 Reg. No. HRA/500/R/MA/LAB/4



LABORATORY REPORT

Name: Sumaira.	Age/Sex: **Year/ Female
Ref By: Dr.	Date: 22 - 07 - 2017
Specimen TFTs	Lab. No. 165

Thyroid Function Tests

TEST	RESULT	UNITS	N.RANGE
T3	2.7	ng/ml	0.8 - 2.0
T4	17.62	ng/ml	5.0 - 12.0
TSH	0.12	uIU/ml	01 Year 0.4 - 8.6 04 - 19 Yrs 0.4 - 6.2 21 - 54 Yrs 0.4 - 4.2 55 - 87 Yrs 0.5 - 8.9

Correlate Clinically

Far Ali Awan
F.C.P.S-I
Critical Care Medicine
PMDC Reg No 8398-N

Nadir Mumtaz
Medical Technologist
DMLT (UIMS) Abbottabad
BSC MLT (FIMS)

Muhammad Arshad
Medical Technologist
MSc MLT, BSc MLT (BMU), DMLT (PIMS)
Biochemistry Deptt A.M.C Ald

15



CHUGHTAI LAB
ONE NATION - ONE LAB

Patient No.: 30201-17-1030188

Case #: 30209-13-12

Patient Information		Lab Information	
Name:	SUMAIRA BIBI	Registration:	Manshra: King Abdullah Hospi
Age/Sex:	28 Year(s)/Female	Destination:	Manshra: King Abdullah Hospi
Phone:	03419560099	Registration Date:	December 13, 2017 6:22 pm
		Reporting Date:	December 15, 2017 10:23 pm
		Reference:	Standard.
		Consultant:	DR. MUHAMMAD IQBAL QASIM

PATIENT BILL

S.No.	Test Name	Reporting Date & Time
1	TSH (Serum)	Dec 13, 2017 18:24

Total:	101
Discount:	21
To be Paid:	80
Paid:	80

Remarks:
DISC APPROVED BY R.M

Registered By: Riaz3172

Collection Center:

Center Name: Manshra: King Abdullah Hospital
 Phone No: 03458435761 - 03458435765
 Fax No:
 Contact: Khuram Shaheed
 Address: King Abdullah Hospital Safar Ground Opp
 Al-Falim Plaza Manshra

You can now view your lab results online at www.chughtailab.com
 Please do not lose this receipt. You will need your patient number and case number to view your reports online.
 Lahore: 10 Jail Road, Main Gulberg | Karachi: AJ Khaleej Plaza, Shaheed-e-Millat Road
www.chughtailab.com UAN: 03-111-456-789 Fax: 04235710262 info@chughtailab.com

16



Institute of Nuclear Medicine, Oncology & Radiotherapy

Ayub Medical Complex, Mansehra Road, Abbottabad

DR. MUSAB RIAZ
MBBS, MD, FRCR, MCh, FRCPS (Nuc Med)
Diplomate Certification Board of Nuclear Cardiology (USA)
Abbottabad Nuclear Physician
DHO #100

Phone: 0992-9311030, 9311031
Fax: 0992-9311032
Email: info@ayub.com

PRN: 00592419 Patient's Name: Sumaira Lab No.: 200321
Age: 47 Year(s) Gender: Female Specimen Date: 06-Mar-2019
Referred By: Sample: Collected at our Hospital.

THYROID FUNCTION TEST - RIA

Test	Results Unit	Reference Range
FT3	2.05 pmol/L	2.5 - 5.8
FT4	10.4 pmol/L	11.5 - 23.0
TSH	11.1 uIU/ml	0.3 - 5.00

Comments (if any): Kindly correlate the results with other clinical investigations.

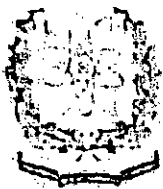
16 { Tab. Thyronorm 25ugm
 16 { 2x daily 1st 1st
 16 { Tab. Nebrad forte
 16 { 1 + 1
 16 { Tab. Parigale 40mg
 16 { 1 + 1

Jilani
FRCR
Nuclear Physician

Computer generated report and does not require any signatures.

Mubarik Ali
Pr. Scientific Assis
Lab Incharge

17



INOR
ABBOTTABAD
Prescription Slip

Phone: 0992-9311029-31

Re:

PRN No: _____

Date: _____

Patient's Name: _____ Sex: _____ Wt: _____ Ht: _____

13

Disease: _____

Clinical Record

Rx

→ Tab Inderal 40mg
1 + 1 + 1

- Tab Azid 0.25g
1 + 1

- Syrup Viothas B
1 + 1 + 1

- Tab Proguanil 25mg
1 + 1 + 1

[Signature]

13
13
13
13
13

19

Institute of Nuclear Medicine, Oncology & Radiotherapy (INOR)

Ayub Medical Complex, Manshera Road, Abbottabad.

UMMASAB RIAZ
MBBS, MD, Nuclear Med, FACP (Nuc Med),
Fellowship Certificate holder of Nuclear Cardiology (USA)
Consultant Nuclear Physician,
DIRECTOR

Phone: 0992-9311029,
9311030, 9311031
Fax: 0992-9311024
Email: umr@pace.gov.pk

PRN: 00592419 Patient's Name: Sumaira Lab No.: 1912200133
Age: 30 Years Gender: Female Specimen Date: 14-Dec-2019 12:00
Referred By: Sample: Collected at our Hospital

THYROID FUNCTION TEST - RIA

Test	Results Unit	Reference Range
FT ₃	22.4 pg/ml	2.0 - 4.25
FT ₄	80.0 pg/ml	7.0 - 18.0
TSH	0.04 µIU/ml	0.25 - 4.00

Comments (if any): *Slightly correlate the results with other clinical investigations.*

Dr. Asif Jilani
INOR

Mubarak Ali
Pr. Scientific Assnt
Lab. Incharge

and does not require any signatures.

Printed on: 18-Dec-2019 03:

20

INOR
ABBOTTABAD
Prescription Slip

Phone:
0992-383149
0992-381458
0992-385462

PRN No. _____

Date 14/12/19

Patient's Name Sumaira

Sp. W/o. D/o _____

Disease known & Hypertension

Clinical Record

Unaided
1 kid 2yr.

Rx known Hypertension for last
5 years. on ATU 8 tab x TDS
for last 2 years.

Adm

✓ T₃, T₄, TSH ✓

✓ 24hr sam

then plan for RA1-131 Therapy.

Tan

21

Institute of Nuclear Medicine, Oncology & Radiotherapy (INOR)

Ayub Medical Complex, Manselira Road, Bahawalpur

DR MUSAB RIAZ
M.D. (Nuclear Medicine)
Fellowship in Nuclear Cardiology (USA)
Consultant Nuclear Physician
DIRECTOR

Phone: 0992-0111020,
9311030, 9311031
Fax: 0992-0111023
Email: info@inor.gov.pk

PRN: JH5924719 Patient's Name: **Saimira** Lab No.: 1912200133
Age: 30 Years Gender: **Female** Specimen Date: 13 Dec 2019 12:00
Referred By: Sample: Collected at our Hospital

THYROID FUNCTION TEST - RIA		
Test	Results Unit	Reference Range
FT3	22.4 pg/ml	2.0 - 4.25
FT4	80.0 pg/ml	7.0 - 18.0
TSH	0.04 µIU/ml	0.25 - 4.00

Comments (if any): *Radiologically correlate the results with other clinical investigations*

Dr. Asif Jilani
MBBS, MSc (NMD)
Nuclear Physician

Mulbarik Ali
Pt. Scientific Assn
Lab. Incharge

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Printed on: 13 Dec 2019





آغا خان یونیورسٹی ہسپتال، کراچی
The Aga Khan University Hospital, Karachi



Near City Grade Station, Amin Colony G
Road Peshawar,
Tel 091-2261547

Medical Record # : L23302088 (MS28976)
Patient Name : MRS. SUMAIRA
Specimen ID : 09032020:CA8985R
Clinical Information / Comments:

add2

Age / Gender : 32Y / Female
Location : MANSEHRA
Requesting Physician : AYESHA RIAZ
Account # : C30592350 - OSR
Requested on : 09/03/2020 - 19:38
Collected on : 09/03/2020 - 19:38
Reported on : 10/03/2020 - 18:38

Test	Current Result	Previous Results & Date	Unit	Ref
Rheumatoid Factor (RF)	11.10		IU/ml	
Cutoff : < 14 IU/ml				
Test measures Rheumatoid factor in serum by Latex-enhanced immunoturbidimetry				
Note: Change methodology effective from 3rd December 2019.				
(LIVER PROFILE (LFT))				
SERUM TOTAL BILIRUBIN	0.4		mg/dl	10
SERUM DIRECT BILIRUBIN	0.1		mg/dl	10
S. INDIRECT BILIRUBIN	0.3		mg/dl	10
SERUM GAMMA GT	21		IU/L	
Male : < 55 Female : < 38				
SGPT (ALT)	32		IU/L	
Male : < 45 Female : < 35				
SERUM ALK. PHOSPHATASE	113		IU/L	
SGOT (AST)	77		IU/L	
Male : < 35 Female : < 31				

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Printed on: 11/03/2020, 05:39 PM / asif iqbal

Dr. Aisha Habib Khan
MBBS, FCPS (Chemical Pathology)
Associate Professor

Dr. Ferooz Ghani
MBBS, PhD (Dorset University)
Associate Professor

Dr. Imran Siddiqui
MBBS, FCPS (Chemical Pathology)
FRCPEd
Professor

Dr. Luma Jinn
MBBS, FCPS
Associate Prof

23

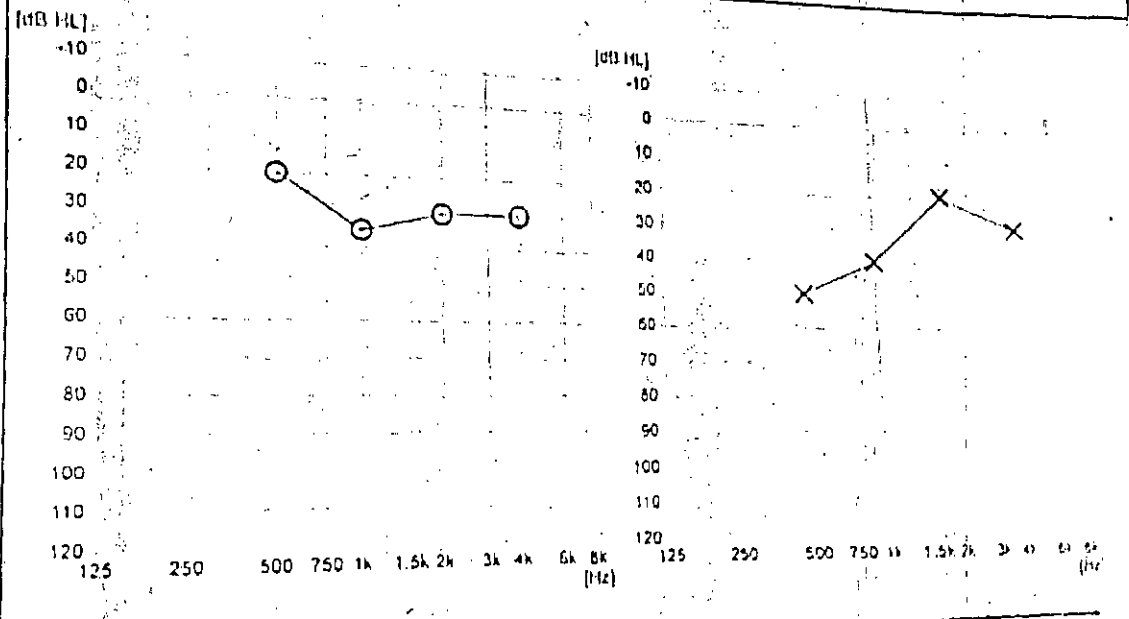
NET AUDIOLOGY & HEARING AID CLINIC

JE #5, G QURESHI PLAZA MANSHERA ROAD MANDIA ABBOTTABAD
 BOTTABAD
 J992-412538

Name: Fatima, Aboorn
 Born: 2/19/2018
 Test date: 8/31/2020

Program: For Sever	Channels: CH1	ASSR	S2R X
	Tested sites: Right + Left Stimuli: AC (ER-3A) Frequencies: 500Hz, 1000Hz, 2000Hz, 4000Hz Sampling: Sweep: 10 blocks X 1024 samples, Spectral resolution = 0.0625 Hz		
Total testing time: 00:26:04			
Sampled sweeps: 43			
Rejected blocks: -			
Initial Impedance CH1 [Ohm]: 4189 [+], 4107 [-], 2 [Delta]			
Software: ASSR Module 2.0.0.307 - Firmware: 16.29			

Audiogram



500Hz	1000Hz	2000Hz	4000Hz
Modulating: 81Hz Waveform: Exponential (*2) AM Modulation: 100% FM Modulation: 25%	Modulating: 85Hz Waveform: Exponential (*2) AM Modulation: 100% FM Modulation: 25%	Modulating: 91Hz Waveform: Exponential (*2) AM Modulation: 100% FM Modulation: 25%	Modulating: 95Hz Waveform: Expon AM Modulation: FM Modulation:

24



CHUGHTAL LAB

ONE NATION - ONE LAB

Patient No: 30201-17-102822097

Case #: 30202-30-09

Patient Name: SUMAIRA
Father/Husband Name:
Age/Sex: 27 Year(s)/Female
Blood:
NIC:
Phone:
Address: . 03419860079

Registration Date: 30-Sep-2017 9:37 am
Registration Location: Manshra: King Abdullah Hospital
Destination Location: Manshra: King Abdullah Hospital Standard
Reference: DR. MUHAMMAD IQBAL QASIM
Consultant

ENDOCRINOLOGY REPORT:

TEST	NORMAL VALUE	UNIT	RESULT
Total T3	70 - 204	ng/dl	170.38
<i>Pregnancy related ranges</i>			
1st Trimester	80.7 - 179		
2nd Trimester	92.4 - 209		
3rd Trimester	87.9 - 207.7		
Total T4	5.5 - 11	ug/dl	10.73
<i>Pregnancy related ranges</i>			
1st Trimester	5.5 - 13.3		
2nd Trimester	7.3 - 14.2		
3rd Trimester	7.3 - 15.1		
TSH	0.35 - 4.95	uIU/ml	< 0.0025
<i>Pregnancy related ranges</i>			
1st Trimester	0.086 - 2.841		
2nd Trimester	0.18 - 2.81		
3rd Trimester	0.30 - 2.92		

Electronically verified report. No signatures necessary.
Lab reports should be interpreted by a physician in correlation with clinical and radiologic findings.

Dr. M. A. Malik
MBBS, MD, FRCR
Consultant Radiologist

Dr. Aylaha Imran
MBBS, FCPS
Consultant Gynaecologist

Dr. Noreen A. Sherazi
MBBS, FCPS
Consultant Chemical Pathologist

Dr. Omar Chughtal
MBBS, MD, FCAP
Diplomate American Board of
Anatomic and Clinical Pathology
Consultant Pathologist

Dr. A. S. Chughtal
MBBS, MD, NIAC, MPH
FCPS, FCPP
Consultant Pathologist

Lahore: 10 Jail Road, Main Gulberg | Karachi: Al Khaleej Plaza, Shaheed-e-Millat Road
www.chughtalab.com UAN: 03-111-456-789 Fax: 04235710262 info@chughtalab.com

28



CHUGHTAIS LAHORE LAB

Patient No. 30201-17-103716991
Case No. 30213-21-08

Patient Name: SUMARIJA
Father/Husband Name:
Age/Sex: 30 Year(s)/Female
Blood:
NIC:
Phone: 03419860299
Address:

Registration Date: 21-Aug-2017 11:17 am
Registration Location: Manshehra Ring Abdullah mosque
Destination Location: Manshehra Ring Abdullah mosque
Reference: Standard
Consultant: DR. MUHAMMAD IQBAL QALIB

ENDOCRINOLOGY REPORT:

TEST	NORMAL VALUE	UNIT	REF
Total T3	70 - 204	ng/dl	243
Reference Ranges			
1st Trimester	80.7 - 179		
2nd Trimester	92.4 - 209		
3rd Trimester	87.9 - 207.7		
Total T4	5.5 - 11	ug/dl	15
Reference Ranges			
1st Trimester	5.5 - 13.3		
2nd Trimester	7.3 - 14.2		
3rd Trimester	7.3 - 15.1		
TSH	0.35 - 4.95	uIU/ml	2.2
Reference Ranges			
1st Trimester	0.086 - 2.841		
2nd Trimester	0.15 - 2.81		
3rd Trimester	0.30 - 2.92		

Electronically verified report. No signatures necessary.
Lab reports should be interpreted by a physician in correlation with clinical and radiologic findings.

Dr. N. A. Malik
M.B.S., M.D., F.C.P.S.
Consultant Haematologist

Dr. Aylsha Imran
M.B.S., F.C.P.S.
Consultant Haematologist

Prof Waheed UZ Tariq
M.B.S., Ph.D., D.Phil.
F.C.P.S., F.N.C.P.N.Z., F.C.P.S.
Consultant Virologist

Dr. Omar Chughtai
M.B.S., M.D., F.C.A.P.
Diplomate American Board of
Anatomy and Clinical Pathology
Consultant Pathologist

Dr. A. S. I
M.B.S., M.D., F.C.P.S.
Consultant

Lahore: 10 Jail Road, Main Gulberg | Karachi: Al Khaleej Plaza, Shaheed-e-Millat Road
www.chughtailab.com UAN: 03-111-456-789 Fax: 04235710262 info@chughtailab.com

26



HAMED LABORATORY

Clinical Pathology: Prof. Dr. Mv. (John) Alire, MBBS (FRCR), DRCR (Path), DRCR (Paed), DCR (London), Diploma in Microbiology (London)

Patient no:
H174/15/2
Lab no:
10/1 - Oct

Name: SUMAIRA
Age/Gender: 29 / F
Report Origin:
Date: 01 October 2015

Time:
6:42 pm
Date:
Thursday

Test	Result	Reference Range
Serum IgG	2.44 µg/ml	Up to 12 months: 0.5 - 2.0 After 12 months: 0.5 - 1.5
Serum IgM	14.3 µg/ml	Up to 1 month: 0.1 - 1.0 Up to 3 months: 0.7 - 1.0 Up to 12 months: 0.5 - 1.0 After 12 months: 0.5 - 1.0
Serum IgH	0.50 µU/ml	Up to 1 month: 0.0 - 1.0 Up to 3 months: 0.5 - 1.0 After 12 months: 0.4 - 1.0

SURELY DIAGNOSE TYPHOID FEVER AT VERY EARLY STAGE BY ASKING "TYPHOID ANTIGEN IN BLOOD"

At Hamed Laboratory we offer the following services: Clinical Pathology, Microbiology, Virology, Serology, Blood Bank, etc.

Prof. Dr/Former Pathologist



آغا خان یونیورسٹی ہسپتال، کراچی
The Aga Khan University Hospital, Karachi

27



ACCRED
CLIA 0889

Near City Gate Station, Amin Colony GT
Road Peshawar
Tel 091-2261547

Medical Record # : L23302088 (MS30578)
Patient Name : MRS. SUMAIRA
Specimen ID : 19012021:CI1392R
Additional Information / Comments:

Age / Gender : 32Y / Female
Location : MANSEHRA
Requesting Physician : IQBAL QASIM
Account # : C32545446 - OSR
Requested on : 19/01/2021 - 17:06
Collected on : 19/01/2021 - 17:06
Reported on : 20/01/2021 - 18:23

Test	Current Result	Previous Results & Data	Unit
SERUM TSH	0.01	117.700 21.000-25.000	uIU/ml
AGE		RANGE uIU/ml	
Premature, 28-36 weeks		0.7---27.0	
CORD BLOOD (>37 weeks)		2.3---13.2	
Birth-4 days		1.0---39.0	
2 weeks-20 weeks		1.7---9.1	
21 weeks-20 years		0.7---8.4	
ADULTS			
21-54 years		0.4---4.2	
55-87 years		0.5---8.9	

PLEASE NOTE THE CHANGE IN REFERENCE RANGES.

This is a computer generated report therefore does not require any signature
Printed on/by : 21/01/2021 12:21 PM / rashid.awan

Aysha Habib Khan
BSc, FCPS (Chemical Pathology)
Senior Lecturer

Dr. Farooq Ghani
MBBS, PhD (Boston University)
Associate Professor

Dr. Imran Siddiqui
MBBS, FCPS (Chemical Pathology),
FRCPI (Edin)
Professor

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28



KING ABDULLAH TEACHING HOSPITAL MANSEHRA

Doctor Name
Qualification

PMDC No.
Address

Contact No.

Patient Name: MANERA

Pat. Reg. No.

Contact Address

Age
Weight
Gender: Female Invoice No 11

Date 24
Time 09

Presenting Complaints

Rx

Name of Drug

Dosage

Strength

Frequency

Qty

Route

4/0
SOB / Shortness of
breath
Palpitations

Hypertension
antihypertensive

Pulmonary

100mg, 100mg, 100mg

9

Past Medication History

Afebrile

SpO2 98%

Chest Clear

CXR - Normal

Investigations

Tab. Bisoprolol 5mg

Q 20 - 1 - 1

Diagnosis

Reason For Referral

Stamp /
Prescri

Dispensed as Prescribed

Any Substitution if Made

Any Major Drug Interaction if Present

DATE & TIME

Name
Pha

Refill

No Refill - Dr. Authorization Required

29



آغا خان یونیورسٹی ہسپتال کراچی
The Aga Khan University Hospital, Karachi



CAP
ACCREDITED ✓

Road, Ferozpur
Tel: 091-2281547

Medical Record # : L23302088 (MS28977)
Patient Name : MRS. SUMAIRA
Specimen ID : 09032020:MUE869R
Clinical Information / Comments

Age / Gender : 22Y / Female
Location : MANSEHRA
Requesting Physician : AYESHA RIAZ
Account # : 0000000000000000
Requested on : 09/03/2020 - 12:30
Collected on : 09/03/2020 - 12:30
Received on : 10/03/2020 - 12:37

Test	Result
YEAST	NIL / MPF
CAST	NIL / MPF
CRYSTALS	NIL / MPF
MUCUS	+2

This is a computer generated report therefore does not require any signature.
Printed on by : 11/03/2020 06:39 PM / asif.icba@3

Dr. Afa Zafar
MBBS, FRC (Pathology)
Professor & Chair

Dr. Enam Khan
MBBS, FCPS (Microbiology)
Associate Professor

Dr. Rumina Niswan
MBBS, FRC (Path) PhD (University of London)
Professor

Dr. Saadia Irfan
MBBS, FCPS (Microbiology)
Associate Professor

Dr. Kaisar Jabeen
MBBS, FCPS (Microbiology)
Associate Professor

Professor
Dr. Muhammad Younas
FCPS

Women Medical College Abbottabad
Consultant ENT, Head & Neck Surgeon
Banazir Bhutto Shaheed Teaching Hospital Abbottabad



E-Mail: ent.plastic@gmail.com
Clinic: Hira Hospital Abbottabad
Contact: 0331-5735040
PMDC No 6907-N

Date 31.8.22

Name Umera

ZADHD

med day

Psychiatrist of 7/11/22

Number 100
10/11/22

30

31

RTU 100ms

3+2+2

- Eds Industrial

07/10/13

P

D

38



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to The Director General Health Services Peshawar and not to any other office.

OFFICE ORDER

Mrs. Sumaira Bibi D/O Ghazi Khan Charge Nurse BPS-16 King Abdullah Teaching Hospital Mansehra is hereby transferred and posted to DHQ Hospital, Karak against the vacant post with immediate effect in the public interest.

NB: - Arrival/Departure report should please be submitted to this Directorate for records

Sd/-
DIRECTOR GENERAL HEALTH SERVICES KP Peshawar

No. 3047-51 R.H. Dated Peshwar 04/08/2021

Copy forwarded to the:-

- 01. Medical Superintendent, King Abdullah Teaching Hospital Mansehra
- 02. Medical Superintendent, DHQ Hospital Karak
- 03. District Accounts Officer, Mansehra
- 04. District Accounts Officer, Karak
- 05. DA-concerned DGHS KPK Peshawar

For information and necessary action.

*1-2111 G. J. Khan
2-NIS*

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR
3/11/21

*N/S. Dip. III / S. Supervisor
PP: Direct to
concerned S/Nurse for
immediate compliance*

2-491/27-91

2-31-8-2

10/11/21

10/11/2021

D Better copy

32

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.**

OFFICER ORDER.

Mrs.sumaira Bibi D/O Ghazi Khan chage
Nurse BPS-16 King Abdullah Teaching Hospital Mansehra is
herely transfer and posted to DHQ Hospital, Karak against the
vacant post with immediate effect in the public interest.

NB:- Arrival /Departure report report
should be submitted to this Directorate for records

Sd/-

Director General Health
Services Kp Peshawar

No.3047-51/ F 11

Dated Peshawar the 04/08/2021

01 Medical superdent King Abdullah Teaching
Hospital Mahsera.

02 Medical supertendent DHQ Hospital Karak.

03 District Account Officer Mansehra.

04 District Account Officer Karak.

05 DA-concrened DGHS KP.k Peshawar.

For information and necessary action.

D Better copy

32

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.**

OFFICER ORDER.

Mrs. sumaira Bibi D/O Ghazi Khan Chage
Nurse BPS-16 King Abdullah Teaching Hospital Mansehra is
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For information and necessary action.

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33

OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA

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OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA



GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Regulation Wing)

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained.
- vi) While making postings/transfers of officers/officials up to BS-17 from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice-versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone-III/FATA quota in the Provincial Services should compulsorily serve in FATA for at least eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thana) of his area/residence is situated.

Para-1(2) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No. SOR-VI(E&AD)14/2007/Vol-VI dated 5-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985 District Government Rules of Business, 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules. Added vide Urdu circular letter No. SOR-VI(E&AD)14/2007 dated 21-09-2007.

Noted

- vii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- (ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfers of the unmarried female government Servants at the station of the residence of their parents.
- (xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement. DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales.
- xii) In terms of Rule-17(1) and (2) read with Schedule III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts or posts normally held by the APUC, PCS(EG) and PCS(SC).	do
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	do
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent.	

Added vide Urdu circular letter No: SOR-VI (E&AD)/1-2005 dated 9.9.2005

[Handwritten signature]

a) Within the same Department	Secretary of the Department concerned.
b) To and from an Attached Department	Secretary of the Dept. in consultation with Head of Attached Department concerned.
c) Within the Secretariat from one Department to another	Secretary (Establishment)

xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- to ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases:

- Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
- Serious and grave personal (humanitarian) grounds.

To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business, 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government.
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government.
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

APPROVED

[Signature]
 District Officer

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As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

(Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003)

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

SPECIMEN NOTIFICATION

GOVERNMENT OF NWFP
NAME OF ADMINISTRATIVE
DEPARTMENT

Dated Peshawar: _____

NOTIFICATION

NO. _____ The Competent Authority is pleased to order the transfer of Mr. _____ Department and to post him as _____ in the interest of public service with immediate effect.

CHIEF SECRETARY,
GOVERNMENT OF NWFP

Encl. No. and date even.

Copy forwarded

- 1.
- 2.
- 3.
- 4.

ATTACHED

- 39
- v) In case of direct submission of application to the Chief Minister, Secretariat for Posting/ Transfer, the concerned govt servants shall be proceeded against under the prevalent rules and regulations.

[Authority: Urdu circular No. SOR-VI(E&AD)/1-4/2003, dated 8-6-2004
Urdu Letter No. SOR-VI(E&AD)/Misc. 1/2005, dated 1-1-2005.]

It has been decided with the approval of the competent authority that:

- i) Mutual transfer would be allowed if both the concerned employees agree, except the Government Servants holding Administrative posts;
- ii) NWFP Government Rules of Business 1985 shall be observed while issuing posting/transfer orders.

[Authority: Urdu circular letter No. SOR (E&AD)/1-4/2005, dated 9-9-2005]

The competent authority has decided that in order to maintain discipline, enhance performance of the departments and ensure optimum service delivery to the masses, the approved/prevalent policy of the posting/transfer shall be strictly followed. Government Servants violating the policy and the NWFP Govt Servants (Conduct) Rules 1987 shall be proceeded against under the NWFP Removal from Service (Special Powers) Ordinance 2000. As required under the NWFP Govt Rules of Business 1985, the Administrative Secretaries shall ensure compliance with the policy and defaulting offices/officials be taken to task. Entries to this effect shall be made in their PERs/ACRs. In case subordinate officers are working on sites or proceeding for the purpose of inspection, they shall submit inspection Report to their Administrative Secretaries. Administrative Secretaries shall ensure submission of such reports.

[Authority: Urdu circular No. SOR-VI (E&AD)/1-4/06, dated, 29-6-2007]

PLACEMENT POLICY

In order to utilize the expertise of the officers who have received foreign training in various fields, the provincial Government has decided to adopt the Placement Policy, approved by the Prime Minister of Pakistan, and make it a part of its Posting/Transfer Policy. Placement Policy as follows:

- i) All placements would be made on the basis of merit and keeping in view the needs of the organization.
- ii) The first priority in placement must go to the parent organization of the participant from where the individual had applied. This will be in consonance with the concept of establishing the "Need" for the department and fulfilling the need through "capacity building" for the organization.
- iii) In order to follow the "bottom-up approach" for Devolution, the priority within departments must go to the Districts, the Provinces and then the Federal Government.
- iv) The second priority in placement should go to up-grading the existing training Institution within the country. The knowledge gained by the

Placement Policy has been made part of the posting/transfer policy vide Urdu circular No. SOR-VI(E&AD)/1-4/06, dt 2-1-2007

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officers, will be of immense value to bring about a qualitative change in the training institutions. The following proposals are made in this regard:

- a) Permanent posting of an officer to the training institutions for 2-3 years;
 - b) Temporary attachment with the training institutions, for 3 to 6 months for some research project or helping in developing case studies;
 - c) Earmarked as a visiting faculty member for specific subject.
- v) Individuals posted to their parent organizations will also organize training for their subordinates within the department, in order to transfer the knowledge and bring about a qualitative change internally;
- vi) The Normal tenure of posting as already provided in the policy would be ensured;
- vii) No participant should be allowed to be posted on deputation to a functional department for at least 5 years;
- viii) No participant will decline to be posted to a functional department.

RECEIVED


tested

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KING ABDULLAH TEACHING HOSPITAL MANSEHRA

Doctor Name
Qualification

PMDC No.
Address

Contact No.

Patient Name: ABEERA FATIMA

Pat. Reg No.:

Contact Address

Age
Weight

Gender: Female Invoice No 56078

Date 27 Aug 2020

Time 12:45 PM

Known Allergies:

Presenting Complaints	Rx					
	Name of Drug	Dosage	Strength	Frequency	Remarks	
Presenting Complaints - Recurrent episodes of Nausea & Vomiting Delayed menstruation Abdominal pain Constipation		Period	Qty	Route		

Past Medication History

R
Syrup Serravallo
1/2

Investigations

- Preliminary Check
Detailed Microbiology

Handwritten signature and stamp of the prescriber.

Diagnosis

Reason For Referral

Stamp & Signature of Prescriber

Dispensed as Prescribed.

Any Substitution If Made

Any Major Drug Interaction If Present

DATE & TIME:

Refill

No Refill - Dr. Authorization Required

Name & Signature of Pharmacist

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Dr. Syed Tahir H. Shah



M.B.B.S, D.P.M, F.C.P.S
CONSULTANT PSYCHIATRIST

Ayub Medical Complex, Abbottabad
Email: drtahirshah123@gmail.com

PMDC # 7976-N

Abeer Fatima.

31/8/20

2 1/2 yrs

مانسہرہ رات دوپہر

Refer to speech therapist
for assessment & management

Revisit:			
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روزانہ صبح	روزانہ شام
شام 4 سے 8 بجے	سورج بچتہ، اتوار

"Not valid for court"

Clinic: Allied Specialist Clinics, Near Pakistan Air Force Selection Center Mansehra Road,
Contact: 0311-5885025

U3

earnet

Audiology & Hearing Aids Clinic

more than hearing

Patient Name		Age	Sex	Date
Abbreviation		Years (months)	F	31/08/2020
Reference		Dr Anzela		City
				Manshera

Hearing assessment was done by doing Auditory Steady State Response (ASSR)

PATIENT HISTORY

No H/O Arousal on making loud sounds. No H/O ear discharge. No H/O family hearing loss.

OTOSCOPIC EXAMINATION

- No wax ear canal.
- No wax ear canal.

AUDITORY STEADY STATE RESPONSE

During the ASSR subject was in deep sleep. ASSR was performed at 500Hz, 1K Hz, 2K Hz, and 4K Hz with search limit 80-110dBHL. Response confidence level is 95%. ASSR threshold were detected at:

	500 HZ	1000 HZ	2000 HZ	4000 HZ
R <input checked="" type="radio"/>	20	35	30	30
L <input checked="" type="radio"/>	50	40	20	30

CONCLUSION

- Right Mild degree hearing loss ...
- Left Mild to Moderate degree hearing loss...

MANAGEMENT/ SUGGESTION

- > Hearing Aid both ear
- > Speech Therapy

Not valid for any court

Office # 5-6 Qureshi Plaza Manshera Road, Mandrian Abbottabad Phone 0992-353815
Head Office

Office # 3 2nd Floor, G-8 Square Plaza, G-8 Market, Near Islamabad Diagnostic Center (IDC), Islamabad-Pakistan Ph. +92 31 831

Email info@earnet@gmail.com | audiologyclinic@earnet.edu | www.earnet.edu | www.earnetclinic.com

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more than hearing

Patient Name: Aleeq Fatima		Age: 2 years 6 months	Sex: F	Date: 11-01-2020
Referral: Dr Angela			City: Manshera	

Hearing assessment was done by doing Auditory Steady State Response (ASSR)

PATIENT HISTORY
No H/O Arousal on making loud sounds. No H/O ear discharge. No H/O family hearing loss.

OTOSCOPIC EXAMINATION
 No wax ear canal.
 No wax ear canal.

AUDITORY STEADY STATE RESPONSE
 During the ASSR subject was in deep sleep. ASSR was performed at 500Hz, 1K Hz, 2K Hz, and 4K Hz with search limit 80-210dBHL. Response confidence level is 95%. ASSR threshold were detected at:

	500 HZ	1000 HZ	2000 HZ	4000 HZ
R <input checked="" type="radio"/>	20	35	30	30
L <input checked="" type="radio"/>	50	40	20	30

CONCLUSION
 Right Mild degree hearing loss ...
 Left Mild to Moderate degree hearing loss ...

MANAGEMENT/ SUGGESTION
 ➤ Hearing Aid both ear
 ➤ Speech Therapy

Not valid for any court

VAKALATNAMA

NO. _____/20

IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR

Sumaira Bibi

Appellant
Petitioner
Plaintiff

VERSUS

Health Dept

Respondent(s)
Defendants (s)

I/WE Sumaira Bibi

do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and al proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____/20

Sumaira Bibi

(CLIENT)

ACCEPTED

Syed Noman Ali Bukhari
SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT

CELL NO: 0306-5109438

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

Service Appeal # 7399 of 2021

Sumaira Bibi-----Appellants

Versus

Government of Khyber Pakhtunkhwa & others----- Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 TO 3

Respectfully Sheweth:

Preliminary Objections:-

1. That the appellant has got neither cause of action nor did locus standi to file the instant appeal.
2. That the appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant appeal is against the prevailing Law and Rules.
4. That the appeal is not maintainable in its present form and also in the present circumstances of the issues.
5. That the appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
6. That the appellant has not come to this Honorable Tribunal with clean hands.
7. That the appeal is barred by law and limitation.
8. That the Honorable Tribunal has no jurisdiction to adjudicate upon the matter.
9. That the instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.

ON FACTS:

1. Correct.
2. Incorrect. The appellant is domicile holder of District Abbottabad and she has already completed her normal tenure in King Abdullah Teaching Hospital Mansehra.
3. Pertains to record. However, being a civil servant she may be posted anywhere by the competent authority.
4. Incorrect. The appellant was transferred as she was found misbehaving with patients and using abusive language all the time. So far as communication is concerned the fact has not been mentioned in his departmental appeal hence denied.
5. Incorrect. The Departmental Appeal of the appellant has been decided within 15 days and rejected due to non-maintainable in the eyes of law.
6. Needs no reply being formal.

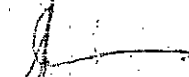
ON GROUNDS:

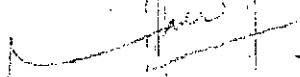
- A. That transfer order of the appellant is not against the law and no violation of Govt. rules has been done.
- B. The appellant has been transferred in the public interest as already explained in Para No. 4 of the facts. Her husband is not a Govt. servant.
- C. The order of the appellant was passed as per rules and her husband is not a Govt. servant.
- D. Pertains to record.

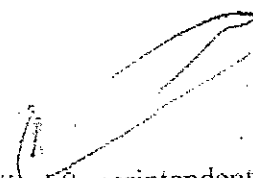
- E. The viral disease is now under control and there is ~~no~~ lockdown in the country and public transport is on roads.
- F. Detailed reply has already been furnished in Para-B.
- G. As in preceding para.
- H. The appellant has been transferred in the public interest. Her husband is not a Govt. servant.
- I. As in Para-A.
- J. As in Para-B.
- K. The appellant has been transferred in the public interest. Her husband is not a Govt. servant.
- L. As in Para-D.
- M. Incorrect. The appellant has been transferred to DHQ Hospital Karak against a vacant post.
- N. As in Para-B.
- O. As in Para-M.
- P. The appellant has not been transferred on personal liking disliking rather transferred in the public interest as already explained in 4.
- Q. The answering respondents also seek prior permission of this Honorable Court to adduce additional grounds at the time of arguments.

PRAYER:

It is therefore humbly prayed that on acceptance of the comments, the instant appeal of the appellant may very graciously be dismissed with costs.


Secretary to Govt. of Khyber
Pakhtunkhwa Health Department
Respondent No. 01


Director General Health Services
Khyber Pakhtunkhwa
Respondent No. 02


Medical Superintendent
King Abdullah Teaching Hospital
Manselhra
Respondent No. 03