

BEFORE THE LEARNED SERVICE TRIBUNAL, PESHAWAR

APPEAL NO.1615/2022

ZAHID ALI

VERSUS

SECRETARY, HEALTH
DEPARTMENT KP &
OTHERS

INDEX

S.No	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE NUMBERS
1	PARA WISE COMMENTS	IN ORIGINAL	01 - 04
2	AFFIDAVIT	IN ORIGINAL	05
3	COPY OF APPOINTMENT ORDER	"A"	06
4	COPY OF DISCIPLINARY PROCEEDINGS	"B"	07 - 39
5	COPY OF OFFICE ORDER DATED 12-09-2022	"C"	40 - 41
6	VAKALATNAMA	IN ORIGINAL	42

THROUGH,



BARRISTER IBRAHIM KHAN AFRIDI

DATED:14-06-2023

BEFORE THE LEARNED SERVICE TRIBUNAL, PESHAWARAPPEAL NO.1615/2022

ZAHID ALI

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 6187SECRETARY, HEALTH
DEPARTMENT KP &
OTHERSDated 26-06-23

PARA-WISE COMMENTS ON BEHALF OF THE RESPONDENT NO. 3 & 4

RESPECTFULLY SHEWETH:

The Answering Respondents most earnestly seek permission of this Learned Tribunal to submit as under;

PRELIMINARY OBJECTIONS

- I. That no cause of action has accrued to the Appellant nor has any discernible cause of action been pinpointed by the Appellant.
- II. That no right of the Appellant has been infringed as such the Appeal is not maintainable.
- III. That the Appellant has come to this court with sullied hand, by concealing material facts.
- IV. That neither any rule, law or regulation has been specified by the Appellant, which has either been infringed by the Answering Respondent or from the application of which the Appellant feels aggrieved.
- V. That the services of the Appellant have been relieved/repatriated back to DGHS as per law, therefore, the subject appeal is misconceived.
- VI. That the Appellant has rightly been repatriated as per law, moreover, being a matter of policy the same cannot be lightly interfered with.

FACTS

02

1. Paragraph Numbered 1 is subject to proof.
2. Paragraph Numbered 2 is correct to the extent of Appellant having worked in the Respondent Institution. The Appellant was appointed by the Government of Khyber Pakhtunkhwa, it is pertinent to note that by virtue of clause 4 of the appointment order, the Appellant could be transferred anywhere in Khyber Pakhtunkhwa.

COPY OF THE APPOINTMENT ORDER IS ANNEX A

3. Paragraph Numbered 3 is incorrect, hence sternly denied. During the course of his service, the Appellant was given several explanations, warnings and an enquiry. However, he has not been stigmatized while repatriating him from the Respondent Institution.

COPY OF DISCIPLINARY PROCEEDINGS IS ANNEX B

4. Paragraph Numbered 4 is sternly denied being incorrect. Detailed reply is given in above Para.
5. Paragraph Numbered 5 is correct to the extent of issuance of the Office order dated 12-09-2022, however, the remaining paragraph as drafted is incorrect and thus sternly denied.

COPY OF THE OFFICE ORDER DATED 12-09-2022 IS ANNEX C

6. Paragraph Numbered 6 is correct. However, the Appellant service history is full of disciplinary violations of the Respondent Disciplinary policy. The Appellant was appointed by the Government of Khyber Pakhtunkhwa, and by virtue of clause 4 of the appointment order, the Appellant could be transferred anywhere in Khyber Pakhtunkhwa. The DGHS have all the means to adjust the Appellant in any other Hospital in the Province of Khyber Pakhtunkhwa.
7. Paragraph Numbered 7 is correct.
8. Paragraph Numbered 8 needs no comments on part of the Answering Respondents, however in view of the replies to the preceding paragraphs, there exists no grievance of the Appellant and as such the appeal of the Appellant is ill founded.

GROUNDS

- A. Ground A is incorrect, hence denied. Transfer and posting of a civil servant is not justiciable.
- B. Grounds B is denied being incorrect. The services of the Appellant have been repatriated back to his parent department without an iota of stigma.

- C. Ground C is denied being incorrect. As explained earlier no illegality can be pinpointed by the Appellant.
- D. Ground D is incorrect, place of posting or choice of posting is not a vested right of the Appellant. Moreover, the Answering Respondents have effectively only repatriated the Appellant back to his parent department for onward process without an iota of stigma.
- E. Ground E is incorrect, hence denied. The order impugned is appropriate and legal, warranting no interference being a purely administrative matter.
- F. Ground F is incorrect thus denied. The disciplinary infringements have already been detailed, moreover the Appellant has not been stigmatized in repatriation order.
- G. Ground G is incorrect, hence sternly denied. Detailed reply is given in above Paras. Moreover, the Respondents too seek permission and reserve the right to agitate any further legal and factual ground at the time of hearing of the subject petition in the interest of fairness and justice.
- H. That any other fact/ground not specifically accepted herein shall be deemed to have been denied by the Respondents.

PRAYER

It is therefore most humbly submitted that that this Learned Tribunal may very graciously be pleased to;

- i. **Dismiss** the subject appeal with costs being meritless and non-maintainable.
- ii. **Grant** any other relief to the Respondents as deemed appropriate in the facts and circumstances of the case.

RESPONDENTS,

THROUGH,




BARRISTER IBRAHIM KHAN AFRIDI

04

VERIFICATION

Verified on oath on this 15th Day of July 2023 at Peshawar that the contents of these comments, including all the objections, paragraphs and grounds are true and correct to the best of my knowledge and nothing have been concealed from this honourable Tribunal either intentionally or otherwise.



DEPONENT

LEGAL OFFICER MTI LRH

BEFORE THE LEARNED SERVICE TRIBUNAL, PESHAWAR

OS

APPEAL NO.1615/2022

ZAHID ALI

VERSUS

SECRETARY, HEALTH
DEPARTMENT KP &
OTHERS

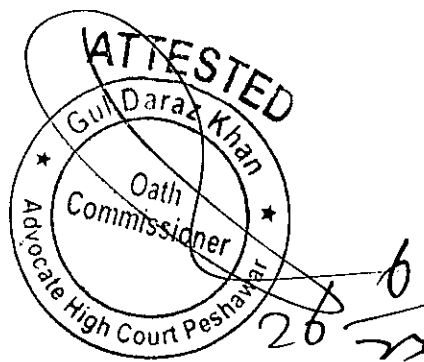
AFFIDAVIT

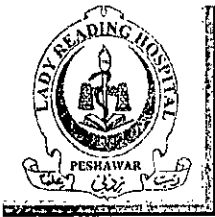
I, **Sabira Naz Qureshi** Legal Officer MTI LRH & duly authorized officer and well conversant with the facts of this case do hereby solemnly swear and affirm on oath that as per the instructions of the Answering Respondents stipulated the contents of these comments are true and correct to the best of my knowledge and nothing has been concealed from this honourable Tribunal either intentionally or otherwise. Furthermore, the appeal has not been exparte against the answering respondents as well as no adverse decision has been taken against the answering respondents.

DEPONENT



IDENTIFIED BY COUNSEL





OFFICE OF THE HOSPITAL DIRECTOR

Lady Reading Hospital, Medical Teaching Institution, Peshawar

Phone # 0092-919211402

Fax: 0092-919211401

www.lrh.gov.pk

Office Order

Miss Sabira Naz Qureshi Legal Officer LRH-MTI Peshawar is hereby authorized to sign, submit the comments/reply on behalf of the respondents / Hospital Director LRH-MTI with immediate effect in the public interest.

Sd/-

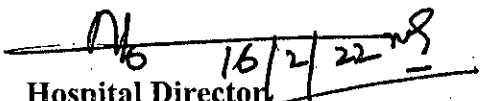
Hospital Director,
Lady Reading Hospital, MTI
Peshawar

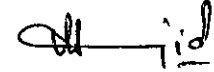
Dated 16/02/2022

No. 305-9 /HD/LRH

Copy forwarded to the: -

1. Dean LRH-MIT
 2. Director HR LRH-MTI
 3. Miss Sabira Naz Qureshi Legal Officer LRH-MTI
 4. Secretary to Board of Governors LRH-MTI
 5. Secretary to Hospital Director LRH-MTI
- For information and necessary action.


Hospital Director,
Lady Reading Hospital, MTI
Peshawar



Annex "A"

OFFICE OF THE ADMINISTRATOR
GOVT. L.R.H. PESHAWAR.

06

OFFICE ORDER:

Mr. Zahid Ali S/O Mohammad Gul
is hereby appointed as Muslim Sweeper in BPS. 7 No. 1245-35-1770
Plus usual allowances as admissible to him
under the rules at Govt. Lady Reading Hospital, Peshawar.

His/Her appointment is purely on temporary basis and is
liable to termination at any time without assigning any reason.

His/Her appointment is subject to production of Medical
Fitness, Certificate.

He/She will be governed by all such rules and order etc
relating to pay, T.A., Leave and Medical Charges etc. as may be issued
by the Govt. from time to time for category of Govt. Servant to which
he belongs.

He/She will be liable to transfer to correspondings any
where in the N.W.F.P.

He/She will be on probation for a period of one year.

If he/She wishes to resign from service, he/She will have
to give one month notice in advance and will continue to serve the
Govt. till the acceptance of his/her resignation by the Competent
Authority and communicated to him/her in writing or will deposit
one Month Pay in lieu thereof.

If he/she accepts the offer on the terms and conditions
above he/she should report for duty to the undersigned within 10-
of the issuance of this offer failing which the offer will be
considered as withdrawn.

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR.

Dated. Pesh: the 7/12 1998.

NO. 24568-72
/LRH;
Copy forwarded to the:-

- 1. Dy: Medical Supt. (Admn);
- 2. Senior Accounts Officer;
- 3. Director General Health Services, NWFP., Pesh;
- 4. Head Sweeper

5. Mr. Zahid Ali S/O Mohammad Gul vice GPO NISAbad
DISH: Peshawar

FOR Information etc

Muzed

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR.

OFFICE OF THE ADMINISTRATOR
GOVT. L.R.H. PEHSAWAR.

Annex "A"
(Better Copy)

6-A

OFFICE ORDER:

Mr. Zahid ali s/o Muhammad Gul is hereby appointed as Muslim sweeper in BPS.1 Rs.1245-35-1770 plus usual allowances as admissible to him under the rules at Govt. Lady Reading Hospital, Peshawar.

His/Her appointment is purely on temporary basis and is liable to termination at any time without assigning any reason.

His /Her appointment is subject to production of Medical fitness, certificate.

He /She will be governed by all such rules and order etc relating to pay, T.A , leave and medical charges etc.as may be issue by the Govt . from time to time for category Govt. Servant to which he belongs.

He/She will be liable to transfer to corresponding any where in the N.W.F.P.

If he/she wishes to resign from service, he/she will have to give one month notice in advance and will continue to serve the Govt. till the acceptance of his/her resignation by the competent authority and communicated to him/her in writing or will deposit one month pay in lieu thereof.

If he/she accepts the offer on the terms and conditions above he/she should report for duty to the undersigned within 10- of the issuance of this offer failing which the offer will be considered as withdrawn.

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR

No. 24568-72/LRH dated Pesh: the 7-12-1998

Copy forwarded to the:

1. Dy. Medical Supdt. (Admin) LRH Peshawar
2. Senior Accounts Officer -do-
3. Director General Health Services NWFP Peshawar
4. Head Sweeper
5. Mr. Zahid Ali S/O Mohammad Gul Vil & PO Nisatt Distt Peshawar

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR

Attended
by
[Signature]

OFFICE OF THE CHIEF EXECUTIVE
GOVT: LADY RANING HOSPITAL
PERHAWAR.

8

NO. 18534 /L.H., dt: 23/8/2018

- 1) - Mr. Jehanzeb Chah Ward Orderly.
- 2) - Mr. Saleem Mohamad Ward Orderly.
- 3) - Mr. Mohid Ali / Sweeper.

Annex "B"

7

Sub: EXPLANATION.

It has been reported by I/C Casualty that a wheel chair is missing from casualty deptt: for the last three months.

You are directed to recover the missing chair within three days after the receipt of this letter, failing which cost of the chair will be recovered from you with disciplinary action.

sd
MEDICAL SUPERINTENDENT
GOVT: LADY RANING HOSPITAL
PERHAWAR.

18535-4/

NO. /L.H.H.

Copy forwarded to those:-

- 1) - Mr. (Adnan) L.H.H. Pesthwar.
- 2) - I/C Casualty Deptt: to please intimate the cost of chair.
- 3) - Chief Accounts Officer, L.H.H. Pesthwar to stop his salary of the officials concerned till further orders.
- 4) - Official Concerned.

For information.

*Attended
at
tid*

MEDICAL SUPERINTENDENT
GOVT: LADY RANING HOSPITAL
PERHAWAR.

23/8

8

OFFICE OF THE MEDICAL SUPERINTENDENT
GOVT LADY READING HOSPITAL PESHAWAR

OFFICE ORDER.

Two-days absence period of Mr. Zahid Ali M/Sweeper
is hereby treated as leave without pay on 21,22, August 2001.

He is further wished to be careful in future.

(Signature)

sd

MEDICAL SUPERINTENDENT
GOVT L.R.H PESHAWAR.

NO. 19748-50 /LRH, Dt: 8 /09/2001.

Copy forwarded to :-

- 1. D.S (Admn;)
 - 2. C.A.O to release his salary.
 - 3. official concerned.
- for information.

Attested
(Signature)

P. I. Gal

MEDICAL SUPERINTENDENT
GOVT L.R.H PESHAWAR.

Copy (Admn;) LRH.

OFFICE OF THE CHIEF EXECUTIVE
GOVT. L.R.H. PESHAWAR.

NO. _____ /LRH; Dt. 25/8/2001.

To

Mr. Zahid Ali,
Muslim Sweeper, LRH, Peshawar.

Subject: EXPLANATION :
Memo:-

It has been reported by Registrar, Chest Unit that you were absent from your duty without any information on 22/8/2001.

You are directed to explain your position within 03-days as to why disciplinary action should not be taken against you in light of Civil Servant Act, 2000. In case you failed to explain the exparte action will be taken.

sd
MEDICAL SUPERINTENDENT
GOVT. L.R.H. PESHAWAR.

NO. 1862629
/LRH;

Copy forwarded to the:-

1. Dy: Medical Supdt. (Admn:) LRH, Peshawar.
2. Registrar, Chest Unit, -do-
3. Chief Accounts Officer, -do-
4. Head Sweeper, -do-

for information and n. action.

(For No. 2) for information and with a request to furnish details of Total Absence of Mr. Zahid Ali, Muslim Sweeper during August, 2001.

(For No. 3) for information and to stop Salary of Mr. Zahid Ali, Muslim Sweeper till further order.

Attached
tid

Pi. Goh
MEDICAL SUPERINTENDENT
GOVT. L.R.H. PESHAWAR.

No. _____ / LHM,

Dated. _____ / 5.2002.

10
18

OFFICE ORDER:-

As reported by the Incharge/Head, that the following Sweepers were found absent from their duties without any information.

1. Javed Sweeper Casualty Surgical Ward (03 days)
2. Ali Haidar M. Sweeper General Duty (03 days 15, 16, 30/4/2002.)
3. Murad Ali M. Sweeper Chest Ward (One day 27.4.2002.)
4. Zahid Ali Sweeper Skin Unit (One day 30.4.2002.)

Their absence period is hereby treated as leave without pay. Further they are directed to explain their position as to why not disciplinary action should be taken against them under the rules 2000.

Reply should reach this office within three days after the receipt of this letter.

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

Dated. _____ / 5.2002.

No. 10,047-5 / LHM,

Copy forwarded to the:-

1. D.M.S. Admn: Govt: LHM Peshawar.
2. Chief Accounts Officer Govt: LHM Peshawar.
3. Senatory Inspector Govt: LHM Peshawar.
4. Official concerned.

For information and n/action.

Attended
[Signature]

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

[Handwritten marks]

GOVT: L.A.Y. HOSPITAL

No. 14585/LRH

Date: 7/7.2002.

(6)
(11)

To,

Sabite

1. Amir Hussain Ward Orderly
C.S.W.
2. Muhammad Tahir Ward Orderly
General duty.
3. Shafiq Ahmad Insh Dishes
Surgical "C" Ward.
4. Zahid Ali M. Sweeper
Skin Ward.
5. Khan Wali W/Orderly
General duty.
6. Farid Ullah Chowkidar
C.O.T.

SUBJECT: WARNING.

From,

Your reply is not satisfactory, you are warned to be careful in future, otherwise ex-parte action will be taken against them.

MEHMOOD SUPERINTENDENT
GOVT. READING HOSPITAL
CHAWAR.

No. 14585/LRH

Date: 7/7.2002.

Copy forwarded to the:-

1. D.M.S. Admin: Govt: L.A.Y. Peshawar.
2. Chief Accounts Officer Govt: L.A.Y. Peshawar to release their Salaries.
3. Head Ward Orderly Govt: L.A.Y. Peshawar.
4. Sakka For information.

Attested
[Signature]

[Signature]

MEHMOOD SUPERINTENDENT
GOVT. READING HOSPITAL
CHAWAR.

(12) (28)

OFFICE OF THE MEDICAL SUPERINTENDENT GOVT: LRH PESHAWAR.

No. 23531 /LRH

Dated 04/8/2005.

To

Mr. Zahid Ali S/O Mahmood Gul
P.O Village Nisata Mohallah Shafi Abed
Tehsil and District Charsadda.

Subject:- EXPLANATION.

It has been reported that you are absent from duty w.e.f 31/7/2005 without information or application which is contrary to rules.

You are directed to appear for duty within 07 days of the receipt of this letter and explain the reason of your absence, failing which strict disciplinary action will be taken against you.

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

No. 23532-34 /LRH

Dated 2/8/2005.

Copy to:-

1. The Director Finance Govt: LRH Peshawar please stop pay of the official till further order.
 2. DMS(Admn) Govt: LRH Peshawar.
 3. Sanitary Inspector Govt: LRH Peshawar.
- for information and necessary action.

Attended
[Signature]

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

13

OFFICE OF THE MEDICAL SUPERINTENDENT GOVT: LAHORE HAWAR.

OFFICE. C.M.R.

Three days absence from 31/7/2005 to 2/8/2005 of Mr. Zahid Ali S/O Mahmood Gul Muslim Sweeper is hereby treated as leave without pay.

Moreover, he is warned to be careful in future.

Sd/-
MEDICAL SUPERINTENDENT
GOVT: LAHORE HAWAR HOSPITAL

No. 23796-99/LRH

Dated 8/8/2005.

Copy to:-

- 1. Director Finance Govt: LRH Feshawar.
- 2. M.D. (Adm) Govt: LRH Feshawar.
- 3. Sanitary Inspector Govt: LRH Feshawar.
- 4. Official Concerned.

for information and necessary action.

Attended *[Signature]*

[Signature]
MEDICAL SUPERINTENDENT
GOVT: LAHORE HAWAR HOSPITAL

9/8/2005

OFFICE OF THE MEDICAL SUPERINTENDENT GOVT: LRH PESHAWAR.

14

30

No. 25596 /LRH

Dated 3/8/2005.

To

Mr. Zahid Ali S/O Mahmud Gul
Muslim Sweeper of Casualty
Govt: LRH Peshawar.

Subject:- EXPLANATION.

It has been reported that you were absent from duty on 28/8/2005 without information or application which is contrary to rules.

You are directed to explain the reason of your absentia within three days of the issuance of this letter, failing which strict disciplinary action will be taken against you.

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

No. 25597-98 /LRH

Dated 31/8/2005.

Copy to:-

1. DMS(Admn) Govt: LRH Peshawar.
 2. Sanitary Inspector. Govt: LRH Peshawar.
- for information.

Attested
id

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

2/30/8

GOVERNMENT LADY READING HOSPITAL, PESHAWAR:

15
38

NO. 27429 /LRH/E.IV:

DATED: 19/09/2005.

To:

Mr. Zahid Khan, Muslim Sweeper,
Govt: L.R.H., Peshawar.

Subject: EXCUSE AND WARNING:

Memo:

Reference your reply of explanation dated 10/09/2005.

Your above quoted reply of explanation is not satisfactory, however
this time you are excused and hereby warned to be careful in future.

Medical Superintendent,
Govt: Lady Reading Hospital,
Peshawar.

NO. 27430-31 /LRH/E.II:
Copy forwarded to :-

01. The D.M.S. (Admin), Govt: L.R.H., Peshawar.
02. The Incharge, Casualty Department, Govt: L.R.H., Peshawar.
03. The Head Sweeper, Govt: L.R.H., Peshawar.

for information.

Medical Superintendent,
Govt: L.R.H., Peshawar.

Attended
by
jid

(16) (28)

OFFICE OF THE MEDICAL SUPERINTENDENT GOVT: LRH PESHAWAR.

No. 34726-27 /LRH

Dated 14 12/2005

To

1. Mr. Sahar Gul
2. Mr. Zahid Ali
Muslim Sweeper,
Surgical B Unit Govt: LRH Peshawar.

Subject:- EXPLANATION.

It has been reported by Incharge Surgical B Unit that on 4/12/2005 you both were absent from duty, as a result there was no washing and cleaning on Sunday and male Surgical B Ward found extremely dirty on Monday.

You are directed to explain the reason within three days after the issuance of this letter, failing which strict disciplinary action will be taken against you.

Muzaffar
MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

No. _____ /LRH

Dated 12/2005.

Copy to:-

1. Professor Incharge Surgical B Unit Govt: LRH Peshawar.
2. DMS(Admn) Govt: LRH Peshawar.
3. Sanitary Inspector Govt: LRH Peshawar.

for information and necessary action.

Affected
[Signature]

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

17

OFFICE OF THE MEDICAL SUPERVISOR GOVT: LRH PESHAWAR.

No. 89 /LRH

Dated 04/1/2006.

To

Mr. Zahid Ali S/O Mehmud Gul
Muslim Sweeper, Male Surgical B Unit
Govt: LRH Peshawar.

Subject:- WARNING.

Your reply of explanation is not satisfactory
However this time you are excused and
warned to be careful in future.

MEDICAL SUPERVISOR GOVT: LRH PESHAWAR
GOVT: LAHORE MEDICAL COLLEGE HOSPITAL
PESHAWAR. 96

No. 90-91 /LRH

Dated 04/01/2006

Copy to:-

- 1. JAS(Admin) Govt: LRH Peshawar.
 - 2. Associate Professor Surgical B Unit Govt: LRH Peshawar.
- for information.

Affected
Zahid

MEDICAL SUPERVISOR GOVT: LRH PESHAWAR
GOVT: LAHORE MEDICAL COLLEGE HOSPITAL
PESHAWAR. 96

(18)

~~At 6~~

OFFICE OF THE MEDICAL SUPERINTENDENT GOVT: LRH PESHAWAR.

No. 21283 /LRH

Dated 13/9/2006

To

Mr. Muhammad Zahid
Muslim Sweeper Male Surgical B Ward
Govt: LRH Peshawar.

Subject:- EXPLANATION

It has been reported that ^{on} 11/9/2006, you were absent from duty without prior permission, which is contrary to rules.

You are directed to explain the reason within three days after issuance of this letter, failing which strict disciplinary action will be taken against you under the rules.

MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

No. 21284-85 /LRH

Dated 13/9/2006

Copy to:-

1. The DMS(Admn) Govt: LRH Peshawar.
2. Registrar Surgical B Unit Govt: LRH Peshawar.

for information and necessary action.

Affected
[Signature]

[Signature]
MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

[Signature]
13/9

19

OFFICE OF THE MEDICAL SUPERINTENDENT GOVT: LRH PESHAWAR.

OFFICE ORDER.

One day absence on 11/9/2006 of Mr. Zahid Ali Muslim Sweeper of Male Surgical B Ward is hereby treated as Leave without pay.

More-over, he is ^{finally} warned to be careful in future.

Sd/-
MEDICAL SUPERINTENDENT
GOVT: LADY READING HOSPITAL
PESHAWAR.

No. 22880-81 /LRH

Dated 02/10/2006.

Copy to:-

1. The DMS(Admn) Govt: LRH Peshawar.
2. The Director Finance Govt: LRH Peshawar.
3. Registrar Surgical B Unit Govt: LRH Peshawar.
4. Official Concerned.

for information and necessary action.

Attended
id.

CH
MEDICAL SUPE INTENDENT
GOVT: LADY READING HOS. ITAL
PESHAWAR.

27/10/06

20 ST

OFFICE OF THE MEDICAL SUPERINTENDENT
GOVERNMENT LADY READING HOSPITAL PESHAWAR.

No. _____ /L.R.H.
Dated 31/10/2006.

To,

Mr. Zahid Ali
Muslim Sweeper, M.S.B. ward,
Govt. Lady Reading Hospital Peshawar

Subject: -EXPLANATION.

It has been reported that on 27.10.2006 you were absent from duty with out information, which is contrary to the rules.

You are directed to explain the reason with-in three days after issuance of this letter, failing which strict disciplinary action will be taken against you.

25268-70

OK
Medical Superintendent.
Govt. Lady Reading Hospital
Peshawar. *ST*

No. _____ L.R.H.

Copy forwarded to:-

1. The Director Finance Govt. Lady Reading Hospital Peshawar. Please consider the above said absence as leave without pay.
2. The Deputy Medical Superintendent (Admn.).
3. Sanitary Inspector Govt. Lady Reading Hospital Peshawar
For information and necessary action.

Attested
Tid.

OK
Medical Superintendent.
Govt. Lady Reading Hospital
Peshawar. *ST*
31/10

4.

Handwritten notes in Urdu at the bottom of the page, including names and dates.

Govt. Lady Reading Hospital, Feshawar.

21

NO. 700-03/LRH

Dated 10/1/2007

To

1. Mr. Fayaz Ali, Sweeper Nephrology Unit,
 2. Mr. Mahid Ali, Sweeper, N. Surgical "B" ward
 3. Mr. Alizbeth Javed, Sweeper on contract, M. Medical C ward
 4. Mr. Arshad Masih, Sweeper on contract, M. Medical "B" unit
- Govt:LRH.Feshawar.

53

Subject:- Explanation

It has been reported that you leave ^{your} ~~the~~ wards dirty at evening and dis-appear from duty places before time, it shows your negligence in work.

You are directed to explain the reason of your negligence within three days after the issuance of this letter, failing which strict disciplinary action will be taken against you.

A. S. Khan
Medical Superintendent
Govt: Lady Reading Hospital,
Feshawar.

NO. _____/LRH

Dated _____/1/2007

Copy forwarded to:-

1. The MIA (Admin) Govt. LRH, Feshawar.
2. The Accounts Officer Govt:LRH. Please deduct one pay from the above officials (sweepers) on account of leaving wards dirty at evening.
3. Sanitary Inspector Govt:LRH, Feshawar.

For information and necessary action.

Attested
[Signature]

Medical Superintendent
Govt: Lady Reading Hospital,
Feshawar.

.....

GOVERNMENT LADY READING H.S. I.P.L. PESHAWAR.

22

SSS

OFFICE ORDER

Whereas following Sweepers remained absent from duty on the dates mentioned against their names, therefore two days salaries are hereby deducted from their pay.

CS 10/1

- | | |
|-------------------------------|-----------------|
| 1. Zahid Ali Male Surgical B | 04 January 2007 |
| 2. Akhtar Munshi Bolton Block | 03 January 2007 |

More-over, they are directed to explain the reason of their absence within three days after issuance of this letter, failing which strict disciplinary action will be taken against them.

Sd/-
MEDICAL SUPERINTENDENT
GOVT. LADY READING H.S. I.P.L.
PESHAWAR.

No. 1190-93 /LRH

Dated 16/1/2007

Copy to:-

1. The DMS (Admn), Govt: LRH Peshawar.
2. The Account Officer Govt: LRH Peshawar.
3. Sanitary Inspector Govt: LRH Peshawar.
4. Officials concerned.

for information and necessary action.

Appended
[Signature]

[Signature]
MEDICAL SUPERINTENDENT
GOVT. LADY READING H.S. I.P.L.
PESHAWAR.

Govt: Lady Reading Hospital, Peshawar.

23
87

1957 /LRH

Dated 23 / 1 / 2007

To

Mr. Sahid Ali,
Muslim Sweeper, Male Surgical Ward,
L.H. Peshawar.

Subject:- Final Warning

Your reply of explanation is not satisfactory. However this time you
are finally warned to be careful in future.

OK

Medical Superintendent
Govt: Lady Reading Hospital,
Peshawar.

To

1958-59 /LRH

Copy forwarded to:-

- 1. The D.S. (Gen) Govt: LRH, Peshawar.
- 2. Sanitary Inspector, Govt: LRH, Peshawar.

For information and n/action.

Attended
H. T. id.

OK

Medical Superintendent
Govt: Lady Reading Hospital,
Peshawar.

To H. 28/1

Govt: Lady Reading Hospital, Peshawar

Dated 25/4/2007

18
24

NO. 9279/LRH

Mr. Zahid Ali, Muslim Sweeper,
Surgical ward, LRH, Peshawar.

Sub: MALNUTRITION

Your reply of explanation is not satisfactory. However, this time you are warned to be careful in future.

Medical Superintendent
Govt: Lady Reading Hospital
Peshawar. *TV*

NO. ~~9280:8~~ /LRH

Copy forwarded to:-

1. The DMS (Admn) Govt: LRH, Peshawar.
 2. The Sanitary Inspector, Govt: LRH, Peshawar.
- for information.

*Attended
Zahid*

Medical Superintendent
Govt: Lady Reading Hospital
Peshawar. *TV*

*76
29/4*

Received 13/12/08
Time: 11-45 AM

25
42

To

The Dy: Medical Superintendent (Admn)
Lady Reading Hospital Peshawar.

SUBJECT: ENQUIRY REPORT.
Sir,

I have conducted enquiry in the complaint of Dr. Jehan Ara against
Zahid Sweeper of this Hospital.

The detail is under:-

On 12/12/2008 Zahid came to OPD. As screen is installed in
female OPD to stop male in the area. Mr. Zahid tried to remove screen & when he was
stopped by Dr. Jehan Ara he abused her. He was called by BMO for investigation. He
told that he abused the Dai as he thought that he was stopped by Dai.

It is mentioned that one of the dai was busy in cleanliness & other
was busy in adjacent Room with patients & he abused Doctor intentionally.

As for his statement that he abused Dais is also illegal & he has no right to abuse for his
illegal acts.

It is recommended that his two increments may be stopped. Final warning may be given
him for improvement. He may be posted in General duty. Sanitary Inspector may be asked
to report his performance on weekly basis.

Report submitted for necessary action please.

Sir I agree with the recommendation of
Enquiry officer and would suggest
that (1) One increment may be deducted from Zahid Sweeper in
cumulative effect.

[Signature]
DR. GHAZALI KHAN
ENQUIRY OFFICER
13/12/08

M.S. KHAN
18/12/08

Agreed
BMS/HQ
18/12/08

Attended
[Signature]



[Handwritten initials]

GOVT. LADY READING HOSPITAL, PESHAWAR

26

73

OFFICE ORDER.

Where as *Mr. Zahid Ali S/O Mohammad Gul, Muslim Sweeper* used abusive language when enquiry conducted against him so as a result of enquiry, one annual increment on cumulative effect is hereby stopped of the official.

More over he is finally warned to be careful in future & improve himself.

Further instructions posted in General duty & Sanitary Inspector is directed to have a glance and submit his performance report on weekly basis.

MEDICAL SUPERINTENDENT
GOVT. LADY READING HOSPITAL
PESHAWAR

No. 40179-83 LPH Peshawar Dated 20 12 2006
Copy to:-

- | | | |
|----|-----------------------------------|--------------|
| 1. | Dr. Ghazal Khan M.D.C.E | LPH Peshawar |
| 2. | The Registrar (Gen. Dept.) Credit | LPH Peshawar |
| 3. | The Engineer in Charge Officer | LPH Peshawar |
| 4. | Sanitary Inspector | LPH Peshawar |
| 5. | Official concerned | LPH Peshawar |

For information & necessary action.

✓

*Accepted
Zahid*

18/12
Dy. Medical Superintendent
For MEDICAL SUPERINTENDENT
GOVT. LADY READING HOSPITAL
PESHAWAR
19/12

J*

27
78

LADY READING HOSPITAL, PESHAWAR

OFFICE ORDER

Where as Mr. Zahid Ali, Muslim Sweeper of Male Surgical C ward left his duty on 30/11/2009 & also his work is satisfactory. therefore on the recommendation of Registrar of the unit as a punishment his three days salary is hereby deducted.

Moreover, he is warned to be careful in future.

Sd/
Medical Supdt. (Admin.)
Lady Reading Hospital
Peshawar

No. 29788-92 LRH, Peshawar. Dated. 18/12/2009
Copy:

- | | | |
|---|-------------------------------|---------------|
| 1 | The Budget & Accounts Officer | LRH, Peshawar |
| 2 | Registrar Surgical C Unit | LRH Peshawar |
| 3 | P. A to Medical Supdt. | LRH, Peshawar |
| 4 | Sanitary Inspector | LRH Peshawar |
| 5 | Officials concerned | LRH, Peshawar |

For information and necessary action

Accepted
[Signature]

[Signature]
Medical Supdt. (Admin.)
Lady Reading Hospital
Peshawar
[Signature]
18/12

LADY READING HOSPITAL PESHAWAR.

28

No. 1724 LRH-E-IV, Peshawar

Dated. 15 01 2011.

(Signature)

To:

✓ Mr. Zahid Ali, Sweeper,
M. Surgical B Ward,
LRH, Peshawar.

Subject: **EXPLANATION.**

It has been reported that you are not working properly, due to which ward's cleanliness suffered badly, it shows your negligence towards Govt. duties.

You are hereby directed to explain the reason within three days, after issuance of this letter, failing which strict disciplinary action will be taken against you.

Dy. *(Signature)* Supdt. (Admin.)
Lady Reading Hospital
Peshawar.

No. LRH/E IV, LRH, Peshawar:

*Copy to Sanitary Inspector, LRH, Peshawar for information.

Affected
(Signature)

Dy. Medical Supdt. (Admin.)
Lady Reading Hospital
Peshawar.

77 (29)

No. 8668 LADY READING HOSPITAL PESHAWAR
/E-IV/LRH

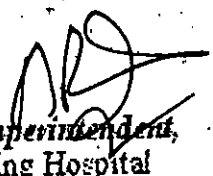
Dated 2 /03/2011.

To,

Mr. Zahid Ali Muslim Sweeper,
Main Surgical C Ward, LRH Peshawar.

Subject:- WARNING.
Memo:-

Though your reply to explanation is not satisfactory however this time taking a lenient action you are hereby warned to be careful in future as continued irresponsible behavior like this will prompt this office to initiate disciplinary action against you.


Medical Superintendent,
Lady Reading Hospital
Peshawar. *W*

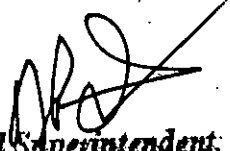
No. 8668-70 /E-IV/LRH dated 2 /03/2011.

Copy forwarded to the:-

1. DMS Admin.
 2. Sanitary Inspector
- For information.

LRH Peshawar
LRH Peshawar.

Applied
W


Medical Superintendent,
Lady Reading Hospital
Peshawar. *W*

W
W
01/3

78

30

LADY READING HOSPITAL PESHAWAR.

21197 ERHE-IV

Dated: 27/06/2011

To

Mr Zahid Ali
Muslim Sweeper Male Surgical Unit
Lady Reading Hospital Peshawar

Subject: EXPLANATION

Memorandum

It has been reported by Head Nurse dated 23-06-2011 that you were left the ward at 10:00 am without any information, which is contrary to rule.

You are directed to explain your position with in 7 days after the receipt of this letter, failing which strict disciplinary action will be taken against you.

[Signature]
25/6/11
DR. MEDICAL SUPERVISOR
LADY READING HOSPITAL
PESHAWAR

No. 21198-200
ERHE-IV
Copies to

Dated: 27-06-2011

- 1. The Head Nurse M.S. Ward Lady Reading Hospital Peshawar.
- 2. The Budget & Account Officer Lady Reading Hospital, Peshawar
- 3. To stop the salary till further order. (Disbursement only)
- 4. Head Sweeper Lady Reading Hospital Peshawar

Affected
[Signature]

[Signature]
25/6/11
DR. MEDICAL SUPERVISOR
LADY READING HOSPITAL
PESHAWAR

[Large handwritten signature]

31

LADY READING HOSPITAL PESHAWAR.

No. 22047 RH/IV Dated 01-07-2011

To,
Mr. Zahid Ali S/O Mahmood Gul
Muslim Sweeper Surgical.C. Unit
L.R.H Peshawar.

Subject WARNING.

Your reply of explanation is not satisfactory. However, this time you are hereby warned to be careful in future.

[Signature]
01/07/11
Dy. Medical Superintendent (Admin)
Lady Reading Hospital
Peshawar.

No. 22048-49 E-II dated 01-07-2011

Copy forwarded to the :-

- 1- Budget & Account Officer LRH Peshawar to release his pay.
- 2- Sanitary Inspector LRH Peshawar for information & necessary action.

Attended
[Signature]

[Signature]
01/07/11
Dy. Medical Superintendent (Admin)
Lady Reading Hospital
Peshawar.

LADY READING HOSPITAL PESHAWAR

No. 33841 /LRH/E.IV Dated 11 /11/2011

To

Mr Zahid Ali S/O Mahmood Gul
Surgical.C.Unit LRH Peshawar.

Subject;

EXPLANATION.

It has been reported by Senior Registrar Surgical.C.Unit vide his report No.320/S.C. dated 01-11-2011 that you were found absent from duty without prior permission/information.

You are directed to explain reason within three days of the issuance of this letter, otherwise strict disciplinary action will be taken against you.

Dy;Medical Supdt(Admn)
Lady Reading Hospital
Peshawar.

No. 33842-44 /LRH/E.IV
Copy to the:-

- 1- Senior Registrar Surgical.C.Unit LRH Peshawar.
- 2- Budget & Account Officer to stop his pay till further order(Disbursement only)
- 3- Head Sweeper LRH Peshawar.
for information and n/action.

Attested
id.

Dy;Medical Supdt(Admn)
Lady Reading Hospital
Peshawar.

LADY READING HOSPITAL PESHAWAR.

33

OFFICE ORDER.

One day absence on 1-11-2011 in the current month 2011 of Mr Zahid Ali S/O Mahmood Gul Sweeper Surgical .C.Unit Unit L.R.H is hereby treated as leave without pay.

He is hereby warned to be careful in future.

Sd/-xxx

Dy; Medical Supdt;(Admn)
Lady Reading Hospital
Peshawar.

No. 35891-94
/LRH/E.IV
Copy forwarded to:-

30-11-2011

- 1- Budget & Account Officer L.R.H Peshawar
- 2- P.A to Medical Supdt; LRH Peshwar.
- 3- Head Sweeper L.R.H Peshawar.
- 4- Official concerned. LRH Peshawar.
for information & n/action.

Dy; Medical Supdt. (Admn)
Lady Reading Hospital
Peshawar.

Attested

Wiqar

91

(34)

LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION PESHAWAR

No. 2350 /LRH/E-IV,

Dated 25 /01/2016

To

Mr. Zahid Ali S/O Muhammad Gul
Dish Washer, MTI/ LRH, Peshawar

Subject:- **EXPLANATION**

Memo:

It has been reported that you were found absent from your duty on 11.01.2016 without prior permission and information, which is contrary to Rules.

You are hereby directed to explain the reason within 03 days after the issuance of this letter, otherwise strict disciplinary action will be taken against you under the E&D rules.

No. 2351-52 /LRH/E-IV

Dated. 25 /01/2016

Subl. aw
Dy: Medical Supdt :(Admn)
LRH/MTI Peshawar *21/1/16*

Copy to:

1. Registrar Surgical D Unit LRH/MTI Peshawar
 2. Head Ward Orderly LRH/MTI Peshawar
- For information.

Attended
at Tid

Subl. aw
Dy: Medical Supdt :(Admn)
LRH/MTI Peshawar *21/1/16*



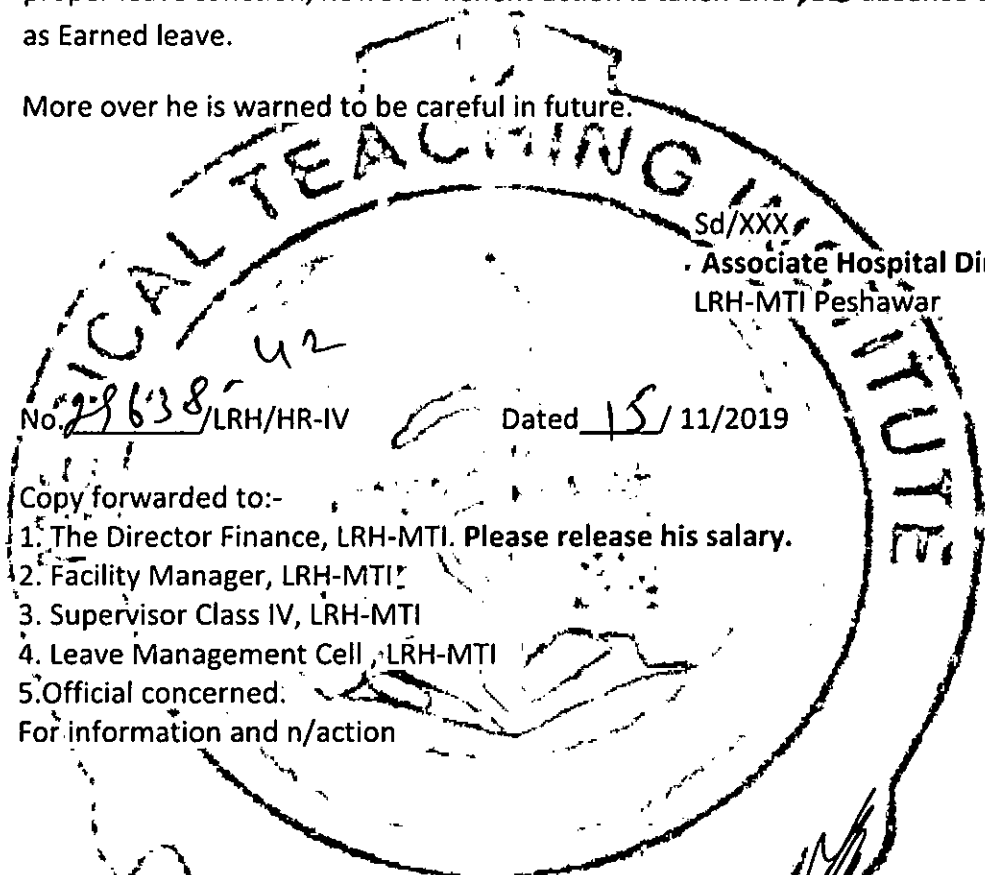
95
**LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR**

35

OFFICE ORDER

Whereas Mr. Zahid S/O Muhammad Gul was absent on 02.11.2019 without any information and proper leave sanction, however lenient action is taken and ~~his~~ absence day is hereby treated as Earned leave.

More over he is warned to be careful in future.



Sd/XXX
Associate Hospital Director
LRH-MTI Peshawar

No. 29638 /LRH/HR-IV

Dated 15 / 11/2019

Copy forwarded to:-

1. The Director Finance, LRH-MTI. Please release his salary.
2. Facility Manager, LRH-MTI
3. Supervisor Class IV, LRH-MTI
4. Leave Management Cell, LRH-MTI
5. Official concerned.

For information and n/action

HR DEPARTMENT

Associate Hospital Director
LRH-MTI Peshawar

Attested
[Signature]

[Signature]
11/11/19



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

36

No. 4755 /HR-IV

Dated. 02/03/2021

To

Mr. Zahid Ali S/o. Muhammad Gul
Dish Washer (HRID: 0959)
LRH-MTI Peshawar

Subject: EXPLANATION

It has been reported that your response to official duty is poor, late comer and also misbehaved with seniors which is breach to discipline.

I am directed to ask you to explain the reason within 07-days of the receipt of this letter, otherwise, strict disciplinary action will be initiated against you.

Accepted
[Signature]

[Signature]

HR Management Officer
LRH Medical Teaching Institution,
Peshawar

7c

0237
0232021

Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221

Arsala Khom ho Yousaf Khan

Rfid #146

[Signature]

DT



106 DWSM-10

37

LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

OFFICE ORDER

Whereas, the following staff remained absent from duty detailed mentioned below.
Therefore, their absence period is hereby treated unpaid: -

S#	Name	Date of absence	RFID #
1	Mehad Ali	22/04/2021 (01-Day)	1139
2	Abdullah	21/04/2021(01-Day)	0344
3	Imtiaz Khan	22/04/2021 (01-Day)	0119
4	Zahid Ali	21-22/04/2021(02-Days)	7-959
5	Muhammad Arif	21/04/2021(01-Day)	1413

They are hereby warned to be careful in future.

Sd/xxx
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

No. 11654-06/HR-IV,

Dated 17/05/2021

Copy forwarded to:

1. Director Finance
2. Manager Housekeeping
3. Officials concerned

For information & necessary action:

Attended
[Signature]

HR Management Officer
Lady Reading Hospital - MTI,
Peshawar

17/5/2021

Arsala Khan 40 Yousaf Khan

Rfid # 146

[Signature] DT



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

38

Enquiry No. 94/IPM/LRH/2022

OFFICE ORDER

Whereas, enquiry committee was constituted via No. 320/HD/LRH, dated; 08-03-2022 to probe into the matter of MPA's visit to MedSurg building dated; 25-02-2022 along with his security guard carrying weapon, the committee concluded that responsibility laid both with Security Staff of LRH-MTI and Askari Guards company but they are unwilling to accept.

Therefore, upon the recommendations of the enquiry report, following decisions are hereby made;

- Manager Security to write to the Askari Guards company for replacement of their guards, (Mr. Ali Gohar, Mr. Asim, Mr. Abdul Ahad, Mr. Usman Ghani, Mr. Ahmad Sher, Mr. Imdad Hussain and Mr. Fazal Ghafoor) with energetic, vigilant and responsible guards who are responsible and be able to avoid such mishaps in future through consent of LRH-MTI administration.
- Walkie-Talkie sets to be provided to the security guards at the gates and the ones on surveillance rounds for effective communication.
- QRF's (Quick Response Force) extension number to be displayed in all wards with proper instructions for on time contact.
- Tea/Coffee and any other food items are prohibited during duty hours and HR department to circulate a memo to all HoDs in the matter.
- Proper SOPs to be prepared by the Manager Security/Security Officer and to ensure proper handing/taking over of charge through Supervisors.
- Admin Officer MedSurg building to be informed beforehand of any transfer, replacement/change of security staff.
- Mr. Husnul Wahab, Security Supervisor (ID: 6-1012), Mr. Salman, Security Guard (ID: 6-4102), Mr. Fazal Qadeem, Security Guard (ID: 6-4110) & Mr. Zahid Ali, Dish Washer (7-0959) are strictly warned to be careful in future.

Sd/-xxx
Hospital Director
Lady Reading Hospital MTI,
Peshawar.

Dated 20/4/2022

No. 10335-41/HR-VII/LRH

Cc:

1. Director Finance, LRH-MTI.
2. Manager Security/Security Officer, LRH-MTI.
3. Manager House Keeping, LRH-MTI.
4. Secretary to HD, LRH-MTI.
5. PA to AHD, LRH-MTI.
6. Personnel File, LRH-MTI.
7. Officials concerned, LRH-MTI.

For information and n/action.

16/15/4/22
Hospital Director
Lady Reading Hospital MTI,
Peshawar.

Alerted
Zahid



117

39

**LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR**

OFFICE ORDER

The absent period of the following Class-IV Staff, dates mentioned against their names is hereby termed as unpaid.

S. #	HRID	NAME	DESIGNATION	ABSENT DATE	NO. OF DAYS
1	6-0320	Muhammad Tahir Ullah	Ward Orderly	29 & 30-03-2022	(02-Days)
2	6-1413	Muhammad Arif	Social Guide	28-03-2022	(01-Day)
3	6-0390	Muhammad Sadiq	Ward Orderly	29 & 30-03-2022	(02-Days)
4	6-3753	Shakeel Ahmad	Porter	30-03-2022	(01-Day)
5	7-0959	Zahid Ali	Dish Washer	29-03-2022	(01-Day)
6	6-2370	Muhammad Raziq	Patient Attendant	30-03-2022	(01-Day)
7	6-0379	Shoaib	Ward Orderly	29-03-2022	(01-Day)
8	6-0217	Alam Zeb	Ward Orderly	19-03-2022	(01-Day)
9	6-0372	Naveed Ahmad	Ward Orderly	13-03-2022	(01-Day)

Moreover, they are hereby warned to be careful in future.

Sd/-xxxx
Hospital Director
Lady Reading Hospital MTI,
Peshawar

No. 10884 /HR-IV/LRH

Dated 25/4/2022

Cc:

1. Director Finance LRH-MTI
2. Manager Housekeeping LRH-MTI
3. Officials Concerned LRH-MTI

Assistant Director HR
Lady Reading Hospital MTI,
Peshawar

o/c

21/4/2022
21/4/2022

Attended
fid



12B
Annex "C"
40

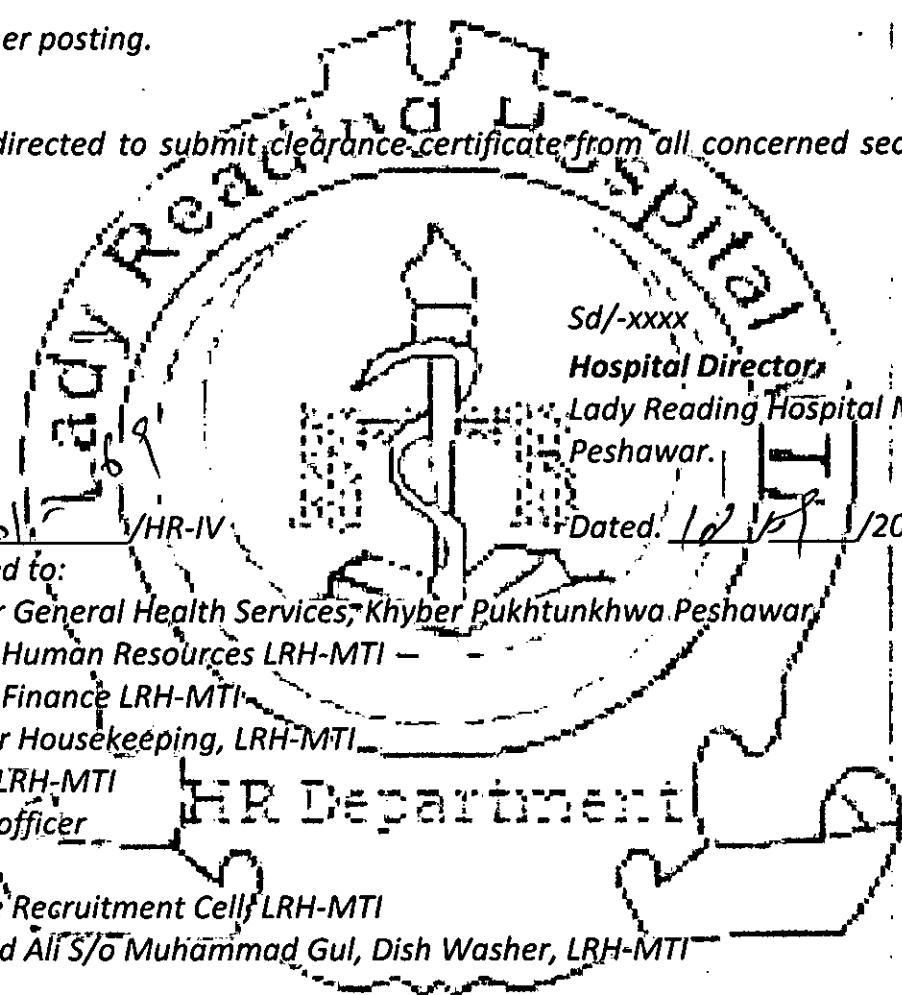
**LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR**

ID: 7-0959

OFFICE ORDER

Mr. Zahid Ali S/o Muhammad Gul, Dish Washer (Civil Servent) is hereby relieved from Lady Reading Hospital MTI and his services are hereby placed at the disposal of Diector General Health Services, Khyber Pakhtunkhwa, Peshawar with immediate effect for further posting.

He is hereby directed to submit clearance certificate from all concerned sections of LRH.



Sd/-xxxx
Hospital Director,
Lady Reading Hospital MTI,
Peshawar.

No. 22661/HR-IV Dated. 12/05/2022

Copy forwarded to:

1. Director General Health Services, Khyber Pukhtunkhwa Peshawar.
2. Director Human Resources LRH-MTI
3. Director Finance LRH-MTI
4. Manager Housekeeping, LRH-MTI
5. Provost LRH-MTI
6. Dealing officer
7. HRMIS
8. Incharge Recruitment Cell, LRH-MTI
9. Mr. Zahid Ali S/o Muhammad Gul, Dish Washer, LRH-MTI

HR Department

Appsted
M. Jid.

Hospital Director
Lady Reading Hospital MTI,
Peshawar.

olc

Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221



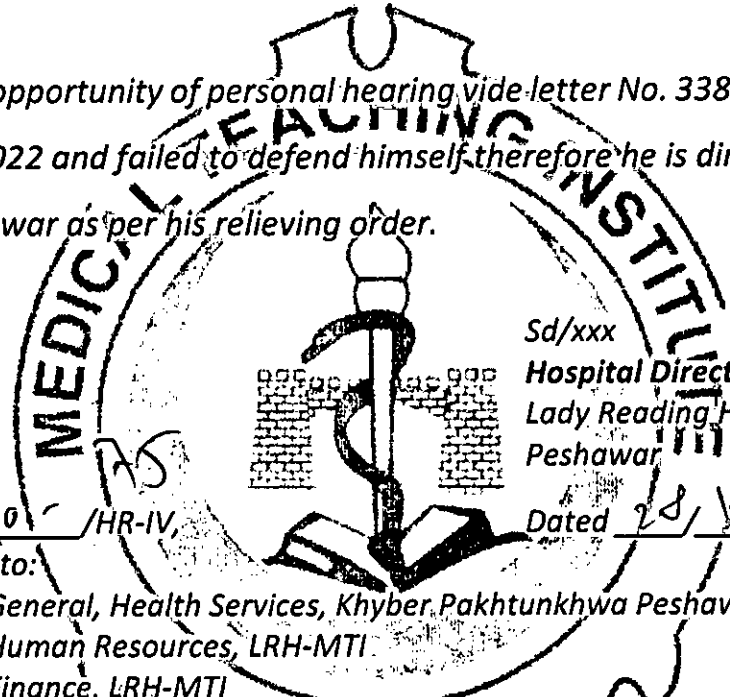
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

41

OFFICE ORDER

Whereas Mr. Zahid Ali, Dish Washer (HRID: 7-0959) relieved to DGHS Khyber Pakhtunkhwa Peshawar vide officer order No. 22661-69/HR-IV, dated 12/09/2022 and subsequent request of DGHS KP via letter No. 13065/Personnel, dated 21/11/2022 for withdrawal of his relieving order.

He availed the opportunity of personal hearing vide letter No. 33883-85/HR-IV/LRH, dated 06/12/2022 and failed to defend himself therefore he is directed to report to DGHS KP Peshawar as per his relieving order.



Sd/xxx
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

No. 36970 /HR-IV,

Dated 28/12/2022

Copy forwarded to:

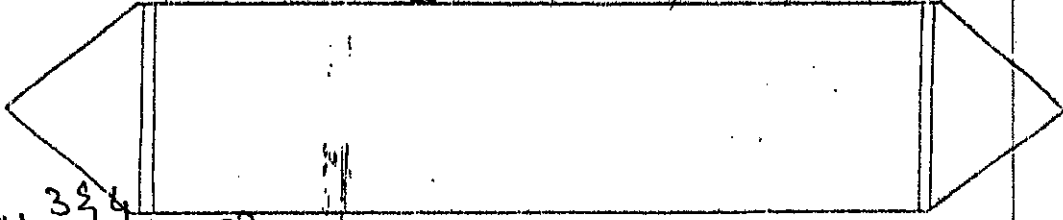
1. Director General, Health Services, Khyber Pakhtunkhwa Peshawar.
2. Director Human Resources, LRH-MTI
3. Director Finance, LRH-MTI
4. Manager Housekeeping, LRH-MTI
5. P.A to Associate Hospital Director, LRH-MTI Peshawar
6. Mr. Zahid Ali S/o Muhammad Gul, Dish Washer.

Accepted
[Signature]

[Signature]
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

109.
[Signature]
26/12/2022

پشاور ہسپتال کیس نمٹیلو لٹاؤ



LRH 344
2023

زاہد علی

14-06-2023

Appeal

موزخہ
مقدمہ
دعوی
جیم

بنام سپرنٹنڈنٹ
کے
دعویٰ

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام پشاور کیلئے سپرنٹنڈنٹ ایبراہیم خان آفریدی
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار دیا گیا۔ نیز
دیکھل صاحب کو راضی نامہ کرنے و تقررات لے فیصلہ پر حلف دینے جہاں دہی اور اقبال دعویٰ اور
بمسورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار دیا گیا۔ نیز مسورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برادگی اور مندرجہ
نیز دائر کرنے اپیل نگرانی و نظارتی و پیروی کرنے کا اختیار دیا گیا۔ از بسورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور دیکھل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
دیا گیا۔ اور صاحب مقرر شدہ کو بھی دہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پر داخستہ مندرجہ ذیل ہوگا۔ دوران مقدمہ میں ہر چیز چاہے جتنا اسے مقدمہ کے سبب سے دیا گیا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دیکھل صاحب پابند ہوں گے۔ کہ پیروی
مہر کو کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

14 جون 2023

Attested & Accepted by
Barrister Ibrahim Khan Afridi

پشاور

HOSPITAL DIRECTOR
Lady Reading Hospital-MLH
Peshawat

16