


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** \_\_\_\_\_

**1610/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/08/2023	<p>The appeal of Mr. Muhammad Zeeshan resubmitted today by Mr. Javed Iqbal Gulbela Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <b>9-8-23</b>.</p> <p>By the order of Chairman  REGISTRAR</p>

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL, PESHAWAR**

In Service Appeal No. 1610 /2023

**Muhammad Zeeshan**

VERSUS

**Inspector General of Police etc.**

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Dated: 27/07/2023

Appellant

Through

Javed Iqbal Gulbela  
Advocate, Supreme Court,  
Pakistan,

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

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL, PESHAWAR**

In Service Appeal No. 16/10 /2023

*Muhammad Zeeshan*, Ex-Constable (Belt No. 718), Special Security Unit,  
District Charsadda.

.....*Appellant*

**VERSUS**

1. *Inspector General of Police*, Khyber Pakhtunkhwa, Peshawar.
2. *Commandant*, Special Security Unit (CPEC), Khyber Pakhtunkhwa  
Police, Central Police Offices, S.A.Q Road, Peshawar Cantt.
3. *Superintendent Police Admin & Minority*, Special Security Unit  
(CPEC), Khyber Pakhtunkhwa, Peshawar.

.....*Respondents*

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL ACT -1974 AGAINST THE  
IMPUGNED ORDER NO. OB430 DATED: 11-04-2023 OF  
THE COMMANDANT SSU (CPEC) WHEREBY THE  
DEPARTMENTAL APPEAL OF THE APPELLANT  
AGAINST THE IMPUGNED ORDER NO. 9630-37 EC/SSU  
DATED: 16-11-2022 OF THE OFFICE OF THE SP SSU  
(CPEC) WHEREBY THE APPELLANT WAS  
DISCHARGED FROM THE SERVICE, WAS TURNED  
DOWN IN CLASSICAL CUROSRY & WHIMSICAL  
MANNER.**

*Respectfully Sheweth,*

1. That initially the Appellant applied against the subject post and was appointed and inducted as Constable onto the rolls of Respondent Police Department vide Appointment Order dated 15/12/2021, after the fulfilment of the codal and procedural formalities required for the subject post and thereby was allotted the Belt No 718 by the Respondent Department.
2. That after appointment the Appellant was posted to perform duties in District Charsadda in Special Security Unit (CPEC) Department whereby the Appellant served a quality of service with honesty and vigor.

3. That back in the days when Appellant was rendering his service with zeal and zest, in the preceding month of September 2022, the tragedy that befell upon the Appellant was the brother of the Appellant named Waleed Jan got critically ill and so to save his precious life was admitted in Sindh Institute of Urology and Transplantation (SIUT), Karachi for treatment.
4. That it equally important to address the fact that the Appellant is the sole sibling of the patient and having said that, the Appellant in dire straits had no one else apart from himself to take care for his ailing brother.
5. That it would be appropriate to mention here that the Appellant had only that ailing brother as having no other brother as well as their father had also passed away years back, so except the Appellant there was no other male member in the whole family either to take his ailing brother to hospital in case of emergency as usually frequent fits used to fall upon his brother nor there was anyone to look-after him while he was hospitalized in SIUT and all these reasons constrained the Appellant to have frequent absence from his duties, but as now the brother namely of the Appellant has passed away and met his Creator , so, there can be no reason left with the Appellant to remain absent ever.
6. That for the aforementioned reasons and purposes, the Appellant with the regular intervals had to fly to another city, whereas it is also pertinent to highlight the fact the Appellant never left a vacuum of communication with his Department but promptly and repeatedly informed and communicated the same to his high-ups and Respondent Department via every possible mean, even for the very reason the reason behind absentia of the Appellant has been reflected in the Impugned Discharge Order as well.
7. That then thereafter, the Appellant was served with the **Impugned Order No.9630-37EC/SSU** dated: 16/11/2022 without conducting inquiry but even then the major penalty of "Discharge from Service" was imposed

upon the Appellant. (Copy of the Impugned Order is annexed here as Annexure "A")

8. That the Appellant thereby assailed the Impugned Order of the competent authority and preferred a Departmental Appeal to the Respondent Commandant Office SSU (CPEC), Peshawar on 20/02/2023, whereby the same was regretted on 16/11/2022 and so the Respondent officer maintained the penalty imposed upon the Appellant and dismissed the Appellant from service. (Copy of the Departmental Appeal & Regret Order is annexed here as Annexure "B & C")
9. That afterwards, the Appellant again preferred another Appeal against the Impugned Order dated 11/04/2023 to the Respondent Inspector General of Police which is still pending and is yet to be decided. (Copy of the Appeal & Dairy Dispatch Number is annexed here as Annexure "D & D-1")
10. That feeling aggrieved from the Impugned Discharge Order and impugned Appellate Order the Appellant approaches this Hon'ble Tribunal for his reinstatement into service with all back benefits upon the following grounds, inter-alia:

**GROUND:**

- A. That the Impugned Discharge/Dismissal order is wrong, illegal, unlawful, void hence the same is liable to be set aside.
- B. That under the mandate of Article 4 of the Constitution, no one should be treated otherwise than in accordance with law, but here the case of the Appellant is *volta-facie* and a totally different yardstick has been taken to treat the Appellant.
- C. That it is pertinent to mention here that the Appellant made several successful attempts to communicate his state of direness to his high-ups' via digital means of cellphone and others, in order to do justice his prestigious duty and Respondent Department, and hence it would totally wrong to suggest that the Appellant went aloof of his duties and lacks

any interest in the same, as reflected and alleged by the Respondents in the Impugned Discharge Order.

D. That it is even settled principle of the law that when everyone must be given equal opportunity to defend himself after which the imposition of any major penalty could be justified in the eyes of the law but here the Respondent has complete departure from the settled cannons of the law.

E. That the Appellant was discharge/dismissal from service through an Impugned Order dated 16/11/2022, which was imposed as a major penalty. The dismissal appears to be unjust and disproportionate considering the circumstances surrounding the Appellant's absence from duty.

F. That it is a cherished principle of law that where a law requires a thing to be done in a particular manner, the same is to be done in that manner and not otherwise.

G. That it also important to address here that when the Appellant got the knowledge of the gravity of the situation, he ensured his participation in the departmental proceedings but that is another tragic episode of condemning the Appellant unheard, as the Respondents' entire proceedings were based on malafide and malfeasance hence they negated the due course of law adopted to conduct the free and fair departmental proceedings

H. That the Appellant had genuine reasons for seeking leave. His brother fell critically ill and was admitted to a hospital in Karachi, which necessitated the Appellant's presence to take care of him. The Appellant acted responsibly by communicating it to the Respondents but he was unable to do procure his attendance in person, likely due to the distance between the cities. The Appellant's inability to reach the authorized officer led to his absence, which was later cited as a reason for discharge of the Appellant's services, resulted in an unfair penalty. **(Copy of the Medical Documents & Death Certificate is annexed here as Annexure "E & F")**

I. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

*It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, the Impugned Discharge Order No. 9630-37EC/SSU Dated: 16/11/2022 and Impugned Appellate Order No. 3554-58/EC Dated: 11/04/2023 of "Dismissal from Service" of the office of the Respondents, may kindly be set aside and by doing so the Appellant be reinstated into service with all back benefits.*

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

Dated: 27/07/2023

Appellant

Through

Javed Iqbal Gulbela  
Advocate, Supreme Court,  
Pakistan,  
Syeda Ume Habiba  
&  
Alamzeb Khan  
Advocates.

**NOTE: -**

As per information of my client, no such like appeal for the same Appellant, upon the same subject matter have earlier been filed, prior to the instant one.

Advocates.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL, PESHAWAR**

In Service Appeal No. \_\_\_\_\_/2023

*Muhammad Zeeshan*, Ex-Constable (Belt No. 718), Special Security Unit, District Charsadda.

**VERSUS**

*Inspector General of Police*, Khyber Pakhtunkhwa, Peshawar.

**AFFIDAVIT**

I, Appellant (Muhamamd Zeeshan) Ex- Constable do hereby solemnly affirm & declare on oath that all contents of the instant service appeal are true & correct to the best of my knowledge and belief, and nothing has been kept concealed from this Hon'ble Tribunal.

Identified by:  
Mr. Javed Iqbal Gulbela  
Advocate Supreme Court,  
Pakistan  
BC 10-79-24  
0332-92793/10

Deponent

  
Ali



-7-

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL, PESHAWAR**

In Service Appeal No. \_\_\_\_\_/2023

**Muhammad Zeeshan**

VERSUS

**Inspector General of Police etc.**

**ADDRESSES OF PARTIES**

**ADDRESS OF THE APPELLANT:**

*Muhammad Zeeshan*, Ex-Constable (Belt No. 718), Special Security Unit,  
District Charsadda.

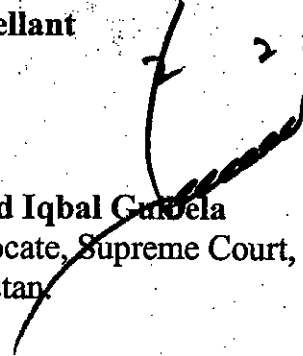
**ADDRESSES OF RESPONDENTS:**

1. *Inspector General of Police*, Khyber Pakhtunkhwa, Peshawar.
2. *Commandant*, Special Security Unit (CPEC), Khyber Pakhtunkhwa  
Police, Central Police Offices, S.A.Q Road, Peshawar Cantt.
3. *Superintendent Police Admin & Minority*, Special Security Unit  
(CPEC), Khyber Pakhtunkhwa, Peshawar.

**Dated: 27/07/2023**

**Appellant**

*Through*

  
**Javed Iqbal Gubela**  
Advocate, Supreme Court,  
Pakistan.

OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT (SSU)  
KHYBER PAKHTUNKHWA POLICE

CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-9214056)



9630-37 EC/SSU

dated Peshawar the 16/11/2022.

ORDER

This order will dispose the formal departmental inquiry against Recruit Constable Muhammad Zeeshan No. 718 of Special Security Unit (CPEC), District Charsadda.

Brief facts of the case are that as reported by LO/SSU HQs: vide DD report No. 16, dated 13.09.2022 that Recruit Constable Muhammad Zeeshan No. 718 had remained absent from his lawful duties w.e.f. 28.02.2022 up to 13.09.2022 (197 days) and once again absented himself from his Basic Recruit Course at PTS Kohat w.e.f. 18.09.2022 till date, due to which he also returned as unqualified to home district.

In this regard, his pay was stopped and a proper departmental inquiry was initiated against him. He was issued charge sheet alongwith summary of allegations vide this office Endst: No. 7167/EC, dated: 16.09.2022 and Mr. Fazle Mabood Khan DSP SSU (CPEC), Kohat Region was appointed as enquiry officer to conduct inquiry into the matter. Who after fulfilling all Codal formalities submitted his findings report, wherein he reported that the charge sheet was served upon the delinquent constable to which he replied that his brother was admitted in SIUT Hospital at Karachi and he was with him for his care but failed to submit any medical documents to prove himself innocent of the charges leveled against him. Furthermore, the EO stated that the reply of Recruit Constable is not satisfactory & he is a student of BS English and has no interest in the discharge of his official obligations. Thus, the EO recommended him for major punishment

Later on he was served/issued with final show cause notice vide this office No. 7885/EC, dated 10.05.2022 to which he replied but remained absent from his lawful duties and failed to make his arrival.

Keeping in view all the above facts as well as recommendation of enquiry officer & material available on record that the above named constable is not taking interest in the discharge of his official obligations and found guilty of the above charges leveled against him. Therefore, I, Superintendent of Police, Admin & Minority Wing SSU (CPEC), being the competent authority in the exercise of powers vested to me under section 5(4) of Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014) hereby awarded him major punishment of "Discharge from Service", his absence period is treated as leave without pay and the Accountant SSU HQs: is directed to reckon & recover the amount if paid to him during his absence.

GR No. 841

Date 16/11/2022

(FAZAL HANIF)

SP Admin & Minority SSU (CPEC),  
Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa.
2. District Police Officer, Charsadda.
3. SP SSU (CPEC), Mardan Region.
4. PSO to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
5. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
6. Accountant, SRC, LO, OASI, I/C HRMS, I/C KOT and VC Clothing Godown HQs. SSU (CPEC).
7. All concern.

JAVED IQBAL GALBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

**BETTER COPY NO (8)**

**OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT (SSU)  
KHYBER PAKHTUNKHWA POLICE**

CENTRAL POLICE OFFICES S.A.Q ROAD PESHAWAR CANTT (PH: 091-9214056)

S. No 9630-37 EC / SSU

dated Peshawar the 16 / 11 / 2022

**ORDER:**

This order will dispose the formal departmental inquiry against Recruit Constable Mohammad Zeeshan No. 718 of Special Security Unit (CPEC), District Charsadda.

Brief facts of the case are that as reported by LO SSU HQst vide DD report No. 16 dated 13.09.2022 that Recruit Constable Muhammad Zeeshan No. 718 had remained absent from his lawful duties w.e.f 28.02.2022 up to 13.09.2022 (197 days) and once again absented himself from his Basic Recruit Course at PTS Kohat w.e.f 18.09.2022 till date, due to which he also returned a unqualified to home district.

In this regard, his pay was stopped and a proper departmental inquiry was initiated against him, he was issued sheet alongwith summary of allegations vide this office Endst: No. 7167/EC dated 16.09.2022 and Mr. Fazle Mabood Khan DSP SSU (CPEC), Kohat Region was acquainted as enquiry officer to conduct inquiry into matter. Who after fulfilling all Codal formalities submitted his findings report, wherein he reported that the charge sheet was served upon the delinquent constable to which he replied that his brother was admitted in SIUT Hospital at Karachi and he was with him for his care but failed to submit any medical documents to prove himself innocent of the charge leveled against him. Furthermore, the EO stated that the reply of Recruit Constable is not satisfactory & he is a student of BS English and has no interest in the discharge of his official obligations. Thus, the EO recommended him for major punishment.

Later on he was served/issued with final show cause notice vide this office No. 7885/EC dated 10.05.2022 to which he replied but remained absent from his lawful duties and failed to make his arrival.

Keeping in view all the above facts as well as recommendation of enquiry officer & material available on record that the above named constable is not taking interest in the discharge of his official obligations and found guilty of the above charges level against him. Therefore, I, Superintendent of Police. Admin & Minority Wing SSU (CPEC), being the competent authority in the exercise of powers vested to me under section 5(4) of Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014) hereby awarded him major punishment of "Discharge from Service", his absence period is treated as leave without pay the Accountant SSU HQrs: is directed to reckon & recover amount if paid to him during his absence.

**(FAZAL HANIF)**

**SP Admin & Minority SSU (CPEC)**  
Khyber Pakhtunkhwa, Peshawar

**GB No. 841**

**Dated: 16.11.2022**

Copy of the above is forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa.
2. District Police Officer Charsadda.
3. SP SSU (CPEC), Mardan Region.
4. PSO to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
5. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
6. Accountant SRC, LO, OASI, I/C HRMS I/C KOT and I/C Clothing Goddown HQrs: SSU (CPEC).
7. All Concern.

**JAVED IQBAL GULBELA**  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

Commandant office SSU.(CPEC)  
Peshawar KPK.

KP Police,

Subject: - Departmental appeal against order dated 16/11/2022 No. 9630-37 EC/SSU for restoration of the appellant to the constable post and for release of salary from date 28/02/2022 till now

Respected Sir,

It is stated that the Appellant is the permanent resident of Turangzai Tehsil and district charsadda who has applied in September 2020 for the post of constable and was selected in the department and secure first position in the ETEA Test in district charsadda. And got appointment letter on 15/12/2021 and got constable No. 718 in your department and was on duty in the SSU(CPEC) District Charsadda and honestly and punctually performed his duty.

That the brother of Appellant namely waheed Jan was seriously ill in February 2022 and was admitted in hospital at Karachi (SIUT) sindh institute of urology and transplantation for treatment and Appellant was there on the said date for the care of his brother and there was no other person in his family or relative who can take care of his brother.

That the appellant for the above purpose submitted an application to the authorized officer in February 2022 for leave which was accepted for 10 days only and the appellant was with his brother in Karachi who contacted the authorized officer through mobile phone in march 2022 for further leave several times but the request was rejected and the Appellant was unable to appear before the authorized officer personally because of unavoidable circumstances of his brother health because he was with his brother in hospital at Karachi and the absence of the Appellant was not intentionally but was because of the said unavoidable condition because of which the Appellant was discharged from duty in 16 October 2022(annex) and his salary/pay was payed in September 2022 after then stopped and charged was framed in the absence of the Appellant without giving him an opportunity to give plausible and satisfactory explanation to the concern officer which is against the law and justice.

It is therefore most humbly requested of your good self to so kindly issue directions for the restoration of the appellant to the constable post and for release of salary from date 28/02/2022 till now of the appellant, with such other benefits that the appellant is entitled to, may also be given to him.

Yours Most Truly  
JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC #5317)

Date - 20-02-2023

Constable Muhammad Zeeshan  
No. 718

OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT (SSU)  
KHYBER PAKHTUNKHWA POLICE

CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-9214056)

3554-58 /EC;

dated Peshawar the 11 / 04 / 2023.

**ORDER**

This order will dispose of the formal departmental appeal preferred by ex- recruit constable Muhammad Zeeshan No. 718 of Special Security Unit (CPEC) against the order of SP Admin SSU (CPEC), wherein he was awarded major punishment of "Discharge from Service" on the allegations that he remained absent from his lawful duties w.e.f. 28.02.2022 to 13.09.2022 (197 days) & once again from 18.09.2022 till date.

In this regard, proper departmental inquiry was carried out. He was issued charge sheet and given enough opportunity to prove himself innocent of the charges leveled against him. He was also heard in person in OR by enquiry officer but failed again. Thus the EO recommended him for major punishment.

Later on he was issued/served with final show cause notice, to which he submitted reply but remained absent from his lawful duties & despite time and again direction to report for his duties, he failed.

In the light of recommendation of enquiry officers and other material available on the record, he was awarded major punishment of "Dismissal from Service" and his absence period w.e.f. 28.02.2022 to 13.09.2022 & once again from 18.09.2022 till date was treated as leave without pay.


Feeling aggrieved against the impugned orders of SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 08.03.2023.

During the course of personal hearing, the applicant failed to prove himself innocent. From perusal of enquiry file it has been found that the allegations were fully established against him by the Enquiry Officer during the course of enquiry. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on findings narrated above, I, Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

**Order announced.**

GB No. 430  
Dated 11/04/2023

  
(MOHAMMAD ZAFAR ALI)<sup>PSP</sup>  
COMMANDANT,  
Special Security Unit (CPEC),  
Khyber Pakhtunkhwa, Peshawar.

- Copy of the above is forwarded for information to the:
1. SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
  2. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
  3. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
  4. Ex- Recruit Constable Muhammad Zeeshan No. 718.

JAVED IQBAL GILBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

same was rejected on no good grounds vide order dated 11-04-

To

THE WORTHY INSPECTOR GENERAL OF POLICE,  
Khyber Pakhtunkhwa, Peshawar.

Subject: 11-A PETITION AGAINST THE ORDER DATED 11-04-2023  
PASSED BY COMMANDANT (CPEC), KP PESHAWAR  
COMMUNICATED & RECEIVED TO THE PETITIONER ON  
26-05-2023

Respected Sir,

Petitioner states as under that:


1. I was appointed as Constable vide order dated 15/12/2021 after fulfilling all the legal and codal formalities required for the post and was allotted with belt no. 718 by the Department.
2. I submitted arrival and started performing my duties with full devotion and enthusiasm.
3. Unfortunately, my elder has severe illness and his treatment was in process from Sindh Institute of Urology & Transplant for the same he was admitted there in Sindh and there was no one except me to look after my brother in such like situation hence, I admitted my brother at SIUT Karachi.
4. I submitted application for leave before the competent authority stating therein my situation of not attending work place (original is placed in my personal file) which was accepted, but the disease prolonged as my brother was suffering from the said disease from so many years.
5. Astonishingly, I was served with the order dated 16-11-2022 where I have been Discharge from Service and my absence is treated as leave without pay.
6. While I was busy with nursing my brother at Hospital as and when my brother got a little bit health, I approached my duty place where I was informed that you have been Discharged from duty vide order dated 16-11-2022, the same was communicated to me hence, through my own efforts I got a copy of the impugned order dated 16-11-2022 in the month of February 2023.
7. I filed Departmental Appeal against the impugned order dated 16-11-2022 before the Commandant SSU (CPEC) Peshawar but the same was rejected on no good grounds vide order dated 11-04-2023, the copy of which is communicated & received to the petitioner on 26-05-2023, hence the instant 11-A petition.

JAVED IQBAL GULZAR BELA  
Advocate  
Supreme Court of Pakistan  
(ASC# 5317)

8. The impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 is against the law and prevailing rules on the subject matter.
9. The impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 have not been passed in its true sense of judicious mind hence liable to be set aside.
10. The impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 have been passed without fulfilling the legal formalities required for issuance of the major penalty.
11. The impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 without conducting regular inquiry in the matter.
12. The impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 has been passed without going through the whole record of the matter.
13. It well settled principle laid down by the apex court of Pakistan that when the absence is less than 365 days a civil servant cannot be terminated/discharge from duty and on this score the impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 are liable to be set aside.
14. The penalty issued to me is very harsh and I am willing to perform my duty with full enthusiasm but the impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 has snatched the livelihood of my life hence natural justice demands that the impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 be set aside.

It is, therefore, most kindly requested that the impugned discharge order dated 16-11-2022 and whereafter order dated 11-04-2023 may very kindly be set aside and I may be reinstated into service, I shall be careful in future.

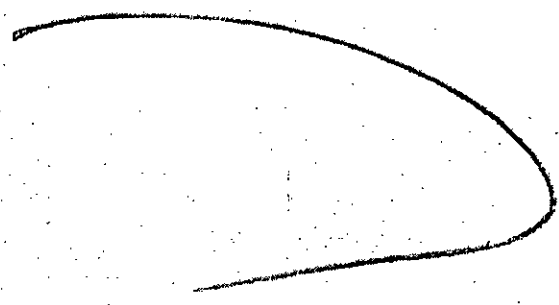
Obediently Yours,

  
Muhammad Zeeshan  
Constable, Belt No. 718  
0318-4667200

JAVED IQBAL GUXBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

APPEAL TO IGT  
CR# 12207/SB

Dated:- 17/07/2023



FROM: DPO HANGU

F





PATIENT REGISTRATION SLIP

STRICTURE CLINIC - OPD14

Token # 21 MR# 1000000248396



Visit Date: 04/10/2022 07:32 Patient Name: Waheed S/O Gulzada

Gender: Male CNIC: 1710102934539 Age: 40 Y, 05 M, 22 D

Height Weight (kg)

K/C: HTN

Δ Stricture Urethra

8/ps Urethroscopy (22/9/20) Urethrotomy (9/2/21)

Ant + Retrograde cystoscopy (29/9/22)

Very small capacity bladder. Complete stricture @ Bulbo-membranous junction not negotiable. Bladder neck not identified

Plan: Currently on S/C since 5 days

1) FWDI → Failed - Bulbo-membranous EPA - 2017

Bulbo - Bladder neck stricture Presence of stricture - 2018

- Current cystoscopy shows

- ① BM - stricture
- ② No bladder neck
- ③ Small capacity bladder

2) Date for EPA via PAPA LGA

used history of UT

8/B Prof. SAT

- Issue:
- ① small capacity bladder
  - ② Bulbo-bladder neck stricture
  - ③ No sphincter + High risk of incontinence failure

JAVED IQBAL GULBELA Advocate Supreme Court of Pakistan (ASC # 5317)

PATIENT REGISTRATION SLIP

STRICTURE CLINIC - OPD14

Token #: 29 MR #: 1000000248396



Visit Date: 07/02/2023 07:30 Patient Name: Waheed S/O Gulzada

Gender: Male CNIC: 1710102934539 Age: 40 Y, 09 M, 26 D

Height:(cm) Weight:(kg) BP<sub>2</sub> 165/94

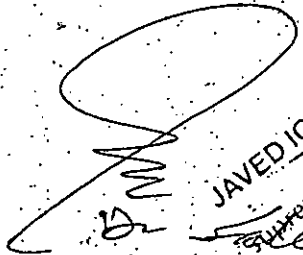
Δ PFUDD

s/p Excision + Bulbo prostatic anastomosis  
2017

Previously Planned for cystogram  
but Pt lost to follow

PLAN SB Dr. Raballah

- Tab. Mirabet 30mg 1+1
- Antegrade + Retrograde Cysto with trigon
- Day time clamping + Night  
time drainage

  
 JAVED IQBAL GUSBELA  
 Advocate  
 Supreme Court of Pakistan  
 (ASC # 5317)



# Karachi 16 - X-RAYS &

## CT Scan / Ultrasound Centre



### Quality Lab

**DR. HAJI HAROON**  
MBBS, DMRD (Eng), FRCR (Eng)

**DR. SYED MAHMOOD**  
MBBS, DMRD (Eng), FRCR (Eng), FCPS (Pak)

**DR. FAHD HAROON**  
MBBS, FCPS (Pak), FRCR (London),  
EDIR (European Board)

DIGITAL X-RAYS  
MAMMOGRAM

FLUOROSCOPY  
OPG & CEPHALOMETRY

CT SCAN  
INTERVENTION

ULTRASOUND  
DOPPLER STUDIES

LABORATORY  
ECHOCARDIOGRAPHY

Slip No. N24082016141  
Patient Name MR. WAHEED JAN GUL ZADA  
Examination URETHROGRAM

Date 24/03/2022  
Age 40 YRS  
Ref Dr. ADEEB RIZVI  
Page 1

CLINICAL INDICATION: Urinary retention for 5 years. Suprapubic catheter placed. History of RTA 5 years back, multiple surgeries done, vesicolithotomy, ureteroplasty.

### CONTROL FILM

Surgical intervention noted over symphysis pubis. Surgical intervention noted over right iliac bone medially. Radio opaque calculus noted in membranous urethra.

Suprapubic catheter noted

### CONTRAST EXAMINATION

#### ASCENDING URETHROGRAM

After all aseptic measures, ascending urethrogram was done.

Complete obstruction noted in distal prostatic urethra.

Calculus noted in membranous urethra.

Normal penile and bulbous urethra.

#### BLADDER

Bladder was filled to its maximum capacity through suprapubic catheter.

Small capacity of bladder noted with considerable deformity.

Grade-V vesicoureteric reflux seen on both sides.

Patient could not micturate, hence prostatic urethra not seen.

### CONCLUSION:

Old fracture seen symphysis pubis and right iliac blade with surgical intervention.

Complete obstruction noted at the level of distal prostatic urethra.

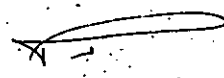
Irregular narrowing seen membranous urethra with calculus present at this level.

Small capacity irregular urinary bladder noted due to previous operative intervention.

Grade-V vesicoureteric reflux seen bilaterally.

Prostatic urethra not visualized as patient could not micturate.

Normal penile and bulbous urethra.

  
DR. FAHD HAROON  
CONSULTANT RADIOLOGIST

  
DR. HAJI HAROON  
CONSULTANT RADIOLOGIST

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

CT Scan (Multislice) Facility Available

PATIENT CLINIC  
EMERGENCY

O.P.D. No. 46 S1  
Date 13/03/2022

Name Waheda

S/o, D/o, W/o 40

Age 40 Sex F

Address \_\_\_\_\_

Date of Registration \_\_\_\_\_

~~Amir (Case 2011)~~

Acute urinary retention

S/P catheter inserted

Structure within, H/O of trauma 5 yrs back

↳ vesicourethral, SPC

- Subst. urethral fistula (Buccal pouch)

- opened to per ure. (Grade 3) 11/9/13

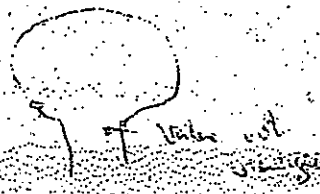
in 2011

wellness of BUA - (11/9/13)

L was planned for

EPA urethoplasty

erectile dysfunction intact



fistula not visualized

f complete

healing

Bulbo-urethral junction

OIC

S/P catheter

- Abdominal Effusion for dx

M. tuberc. positive

Δ P.F.U.D.D.

Fit Date \_\_\_\_\_ Resk. 7.E  
Date \_\_\_\_\_  
03 2 800 C

PLAW

Bulbo-urethral fistula

Prof. Dr. Imran

MAVEDIOBAL GUIBELA  
Advocate  
Supreme Court of Pakistan  
ASC # 53171

Department of Radiology  
Appointment Slip



10000000248396

Wahed  
Male / 40 Year(s)

Appointment Date:  
Tue Mar 21, 2023

Appointment Time:  
09:00 AM

Clinic:  
FLUOROSCOPY

Procedure:  
RL URETHROG

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

LAB REQUEST FORM

Name: Wahid Age: \_\_\_\_\_

No: 2473916 Location: Riad Date: 16/07/23

Clinical Diagnosis: Prostate Cancer

Tests

Javed  
Wahid

JAVED IQBAL GUXBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)



SINDHI INSTITUTE OF UROLOGY &  
FRANSPIANTATION

Department of Radiology

Appointment Slip



#0000000248396

WARHEED

Male / 40 Year(s)

Appointment Date

~~10 OCT 2022~~

Appointment Time

~~09:00 AM~~ 8:30

10 - NOV - Thursday  
Clinic

Procedure

FL CYSTOGRAM

FLUOROSCOPY

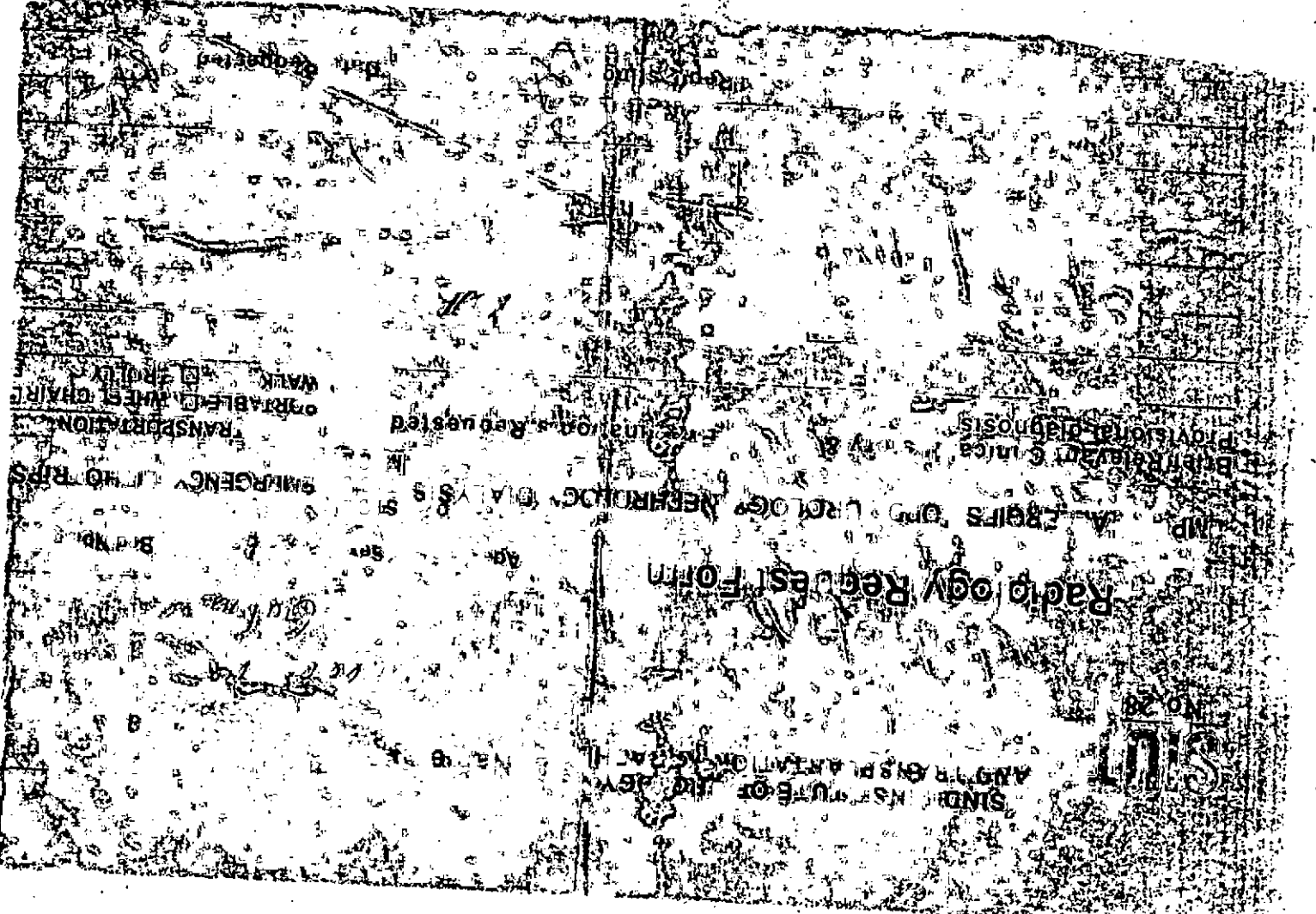
JAVED IQBAL GUBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

Printed On: Oct 04 2022 10:22 AM

Printed By: LAIBA KHAN (600-74663)

-20-

JAVED IOBAL GILBERT  
 ADVOCATE  
 Supreme Court of Pakistan  
 (ASC # 5317)



SINDH UNIVERSITY OF MEDICAL SCIENCES  
 RAJSHAHI CAMPUS  
 H-8, KARACHI

Radio logy Request Form

NAME	
AGE	
SEX	
DATE	
DEPARTMENT	
EXAMINATION	
TEST REQUESTED	
DATE REQUESTED	
APPROVAL	
APPROVED BY	
APPROVED DATE	

APPROVED BY: \_\_\_\_\_

APPROVED DATE: \_\_\_\_\_





# OFFICE OF THE AIRPORT HEALTH OFFICER B.K.I.A PESHAWAR

GOVERNMENT OF PAKISTAN  
DIRECTORATE OF CENTRAL HEALTH ESTABLISHMENTS  
M/o National Health Services Regulations & Coordination, Islamabad  
\*\*\*\*\*

Ph: 091-9213341

Ref. No. \_\_\_\_\_ Date: 15/3/23

## AIR-TRAVEL FITNESS CERTIFICATE

### PERSONAL INFORMATION

Passenger Name: Wahed Jan Age: 40yr Sex: (M)  
Flight Date/Time: 6:10 15/3/23 Dom/Int: Dom Destination: Karachi

Passport No 

--	--	--	--	--	--	--	--	--	--

CNIC No 

1	7	1	0	1	-	0	2	9	3	4	5	3	-	9
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

This Medical Certificate must be produced at Check in

### PRESENTING COMPLAINT:

Short History: patient is breathless, febrile, having Suppurative Cerebral  
General Physical Condition: unstable with

### EXAMINATION FINDINGS:-

Vitals: Pulse 54 B.P. 90/50 Temp. 99F RR 24 dramatic  
pus + white

### FURTHER OBSERVATION ADVICE:

Needs companion during Flight  Yes  No SpO<sub>2</sub> 54%

Contagious /Infection  Yes  No

### FITNESS STATUS FOR TRAVEL

FIT  UNFIT

Additional Medical Information/Remarks(If any): patient is due for some procedure in SIUT but his  
current condition is unstable, he needs hospital care

Issued by (Dr. Name) Dr. Saad Khan Signature [Signature] Airline Flyjinnal

Date of Issue: 15/3/23 Time of Issue: 5:35 A.M/P.M.

[Signature]

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)

- 23 -

SINDH INSTITUTE OF UROLOGY AND TRANSPLANTATION  
Karachi.

*Duplicate*

**SIUT**

No. 29



1000000248396

SIUT

Date	Follow up

DISCHARGE CARD

No. 298396 Date 29/09/12  
Name Wahed & Gulzed

Age 30 Sex M

Address Chas addy WPK

Tel No. 0300-5460705  
0313-0993483

I.D. CARD

--	--	--	--	--	--	--	--	--	--	--	--	--	--

JAVED IQBAL GULBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)



اندراج وفات سرٹیفکیٹ

-24-

"F"

Tracking Id: 91100020005410  
CRMS No. 0843255942  
OLO/M REG #:

Death Registration Certificate

SARKI TITARA\_500820 : دفتر اندراج  
Old CRMS No.:

Deceased Person's Details		متوفی کے کوائف	
Name :	Waheed Jan	نام :	وحید جان
Nationality :	Pakistani	قومیت :	پاکستانی
CNIC No :	17101-0293453-9	شناسی نمبر :	17101-0293453-9
Date of Birth :	12-Apr-1982	تاریخ پیدائش :	12-Apr-1982
Gender :	Male	جنس :	مرد
Religion :	Islam	مذہب :	اسلام
Sickness Period :	16 Days 00 Months 01 Years	مدت علالت :	16 دن 00 ماہ 01 سال
Date of Death :	29-Mar-2023	تاریخ وفات :	29-Mar-2023
Date of Burial/Last rite :	30-Mar-2023	تاریخ تدفین/آخری رسومات :	30-Mar-2023
Place of Death :	home	جائے وفات :	گھر
Reason of Death :	Natural	وجہ وفات :	قدرتی
Nature of Death :	Normal	کیفیت وفات :	عام
Buried/Last rite at :	Ocha Kanda	جگہ تدفین/آخری رسومات :	اوجہ کندہ

Parental Information		والدین کے کوائف	
Father's Name :	Gul Zada	والد کا نام :	گل زادہ
CNIC No :	17101-0351176-5	شناسی نمبر :	17101-0351176-5
Mother's Name :	Sajida Begum	والدہ کا نام :	ساجدہ بیگم
CNIC No :	17101-0271712-2	شناسی نمبر :	17101-0271712-2

Address		پتہ	
Address :	sheraan malak korona Village Ghazli Office ghazli	شورین ملک کورونہ گاؤں غزلی	Office ghazli
Tehsil :	Charsadda	تھسیل :	چارسدہ
District :	Charsadda	ضلع :	چارسدہ

Applicant's Details		درخواست دہندہ کے کوائف	
Name :	Zeeshan Ali	نام :	زیشان علی
CNIC No :	17101-5699200-1	شناسی نمبر :	17101-5699200-1
Relation with Deceased :	Brother	متوفی سے رشتہ :	بھائی

Information of Burial/Last rite by		تدفین/آخری رسومات کنندہ کے کوائف	
Name :	Muhammad Khalid	نام :	محمد خالد
CNIC No :	17101-9212010-3	شناسی نمبر :	17101-9212010-3
Relation with Deceased :	Brother in Law	متوفی سے رشتہ :	بھتیجی
Entry Date :	11-Apr-2023	تاریخ اندراج :	11-Apr-2023
Issue Date :	11-Apr-2023	تاریخ اجراء :	11-Apr-2023
Entry Status :	Late	اندراج اسٹیٹس :	لیٹ
Additional Information :		اضافی معلومات :	



دستخط سیکرٹری  
ویج کونسل سرکی ٹیٹارہ  
تھسیل و ضلع چارسدہ  
Sarkhi Titara

JAVED IQBAL GUMBELA  
Advocate  
Supreme Court of Pakistan  
(ASC # 5317)