


31st Oct., 2022

Assistant to counsel for the appellant present. Mr. Naseerud Din Shah, Assistant Advocate General for the respondents present.


Request for adjournment was made due to engagement of learned senior counsel for the appellant before Honourable Peshawar High Court today. Adjourned To come up for arguments on 14.12.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

14th Dec. 2022

Due to strike of the Bar and Mrs. Rozina Rehman, learned Member (J) being on leave, this matter is adjourned to 03.03.2023 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


(Fareeha Paul)
Member(E)

SCANNED
KPST
Peshawar

15/4/2022.

Appellant in person. Mr. Ghassanullah, ASI alongwith Mr. Kabirullah Khattak Addl. AG for the respondents present and submitted written reply on their behalf. The appellant may submit rejoinder within a fortnight, if so, advised. To come up for arguments on 3.08.2022 before D.B.

CHAIRMAN

3-8-2022

Proper DB not available the case is adjourned to 14-10-2022

H
Reader

14.10.2022

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District for the respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on

31.10.2022.

(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

22.09.2021

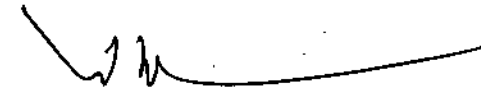
Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.


Chairman

Stipulated period passed reply not submitted.

11.11.2021

Learned counsel for the appellant present. Mr. Masroor Ahmed, Junior Clerk alongwith Mr. Javed Ali, Assistant Advocate General for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for submission of reply/comments as well as arguments on 04.02.2022 before the D.B.


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


(Salah-Ud-Din)
Member (J)

04.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 15.04.2022 for the same as before.


Reader

17.02.2021

The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 29.06.2021.

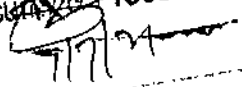

Reader

29.06.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections including limitation. 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, the office shall submit the file with a report of non-compliance. File to come up for arguments on 11.11.2021 before the D.B.

Appellant Deposited
Security & Process Fee




Chairman

15.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 13.07.2020 for the same. To come up for the same as before S.B.

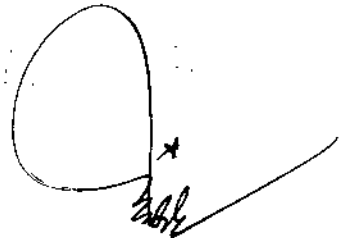

Reader

13.07.2020

Counsel for the appellant present.

Learned counsel for the appellant requests for adjournment.

Adjourned to 22.09.2020 before S.B.


(Mian Muhammad)
Member(E)

22.09.2020

Counsel for the appellant present.

Learned counsel requests for adjournment of instant matter to a date after the decision of proposition regarding retrospective punishment by a Larger Bench of this Tribunal.

Adjourned to 02.12.2020 before S.B.

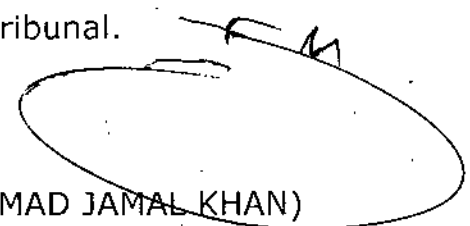

Chairman

02.12.2020

Counsel for appellant is present.

Learned counsel requests for adjournment to a date after the decision of proposition regarding retrospective punishment by a Larger Bench of this Tribunal.

Adjourned to 17.02.2021 before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1730/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/12/2019	<p>The appeal of Mr. Samiullah resubmitted today by Mr. Muhammad Irshad Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p><i>[Signature]</i> REGISTRAR 11/12/19</p>
2-	13/12/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/01/20</u></p> <p><i>[Signature]</i> CHAIRMAN</p>
	16.01.2020	<p>Appellant present in person. Requests for adjournment due to general strike of the Bar. Adjourned to 02.03.2020 before S.B.</p> <p><i>[Signature]</i> Chairman</p>
	02.03.2020	<p>Counsel for the appellant present and seeks adjournment. Adjourned to 15.04.2020 before S.B.</p> <p><i>[Signature]</i> (MUHAMMAD AMIN KHAN KUNDI) MEMBER</p>

SCANNED
Registrar

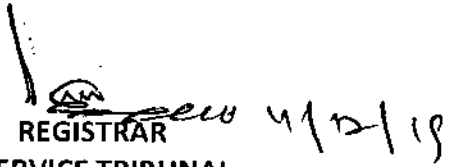
P-72
delay

The appeal of Mr. Samiullah Blet No. 1885 son of Murtaza Khan District Peshawar received today i.e. on 03.12.2019 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Copy of revision petition mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal may be attested.

No. 2122 /S.T,

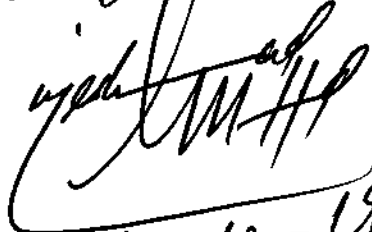
Dt. 4-12-2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Arshad Mohmnd Adv. Pesh.

Respected Sir:

The copy of Revision petition is not available with the Appellant, however Revision Order is place on file as Annex "E", therefore kindly be put up before Honorable Court.


11-12-19

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No: 1730 /2019

Sami Ullah

(Appellant)

VERSUS

**Provincial Police Officer Khyber Pakhtunkhwa Peshawar &
others
(Respondents)**

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Sami Ullah

**Appellant: Sami Ullah
Through**

Muhammad Irshad Mohmand

**Muhammad Irshad Mohmand
Advocate High Court
Off: 15-D, Haroon Mension
Peshawar**

Dated: -28/11/2019

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No: 1730 /2019

Sami Ullah (Blet No 1885) S/o Murtaza Khan R/o Mohallah
Kandari Regi Aftize P/o Khas Tehsil and District Peshawar

(Appellant)
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1712

Dated 03/12/2019

VERSUS

1. **Provincial Police Officer** Khyber Pakhtunkhwa Peshawar
C.P.O Peshawar.
2. **Commandant** Frontier Reserve Police KPK Peshawar Police
Line Peshawar
3. **Deputy Commandant** Frontier Reserve Police KPK Peshawar
Police Line Peshawar.

(Respondents)

Filed to-day

[Signature]
Registrar

03/12/19

**APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE REVISIONAL & APPELLATE ORDER DATED 7-11-2019**

**Re-submitted to -day
and filed.**

[Signature]
Registrar

11/12/19

**& 17/10/2019 OF RESPONDENT NO.1 & 2 WHEREBY THE
REVISION PETITION & DEPARMENTAL APPEAL OF THE
APPELLANT WAS DISMISSED AGAINST THE INITIAL
ORDER OF REMOVEL OF THE APPELLANT FROM
SERVICE VIDE ORDER DATED 25/02/2012 PASSED BY THE
RESPONDENT NO.3 WAS MAINTAINED.**

②

PRAYER

On acceptance of this Service Appeal the impugned Revisional & Appellate order as well as initial order dated 7-11-2019, 17-10-2019 & 25/02/2012 respectively be set aside and the Appellant be reinstated to his service along with back benefits.

Any other remedy which this August Tribunal deems fit and appropriate may also be granted to the appellant.

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Respectfully Sheweth:-

The brief facts leading up to the filing of this Appeal are as under:-

1. That the Appellant has joined the Frontier Reserve Police Khyber Pakhtunkhwa Peshawar as Constable, vide appointment order dated 4/12/2009. **(Copy of Appointment Order is Attach as Annex "A")**
2. That after joining of his service the appellant was performing his duty regularly and remained punctual up to the entire satisfaction of his superior and no complaint, what so ever has been made against the appellant.
3. That during performing duty up to the satisfaction of superior , the appellant was transferred vide transfer order No 789 / 2011

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from Peshawar to Kohat and thereafter the appellant left for Kohat to take over the charge of his duty but unfortunately during travelling, the appellant met with accident and the appellant was hospitalized that is why appellant was unable to make his arrival / take charge in Kohat, and thereafter the appellant accordingly inform / contacted his concerned officer regarding the accident being extreme / severe and badly injured. **(Copy of Medical Certificates are Attach as Annex "B")**

4. That as the appellant was hospitalized due to extreme injuries that is why appellant was not able to make his presence due to serious condition and the appellant filed application for grant of leave to his concerned officer and one month leave was granted to the Appellant, and after passing of one month, the appellant request to the concerned officer being badly injured to grant more leave due to injuries, and for the extension of leave, as the appellant was lying on bed treatment.
5. That thereafter the appellant was informed, that the concern authority has recommended leave to the appellant and the appellant was advised to continue his treatment, therefore the appellant due to accident / continuous treatment did not attend his duty and was lying on continuous bed treatment.

6. That when the appellant was recovered from illness and thereafter reported to his duty, the appellant was informed that he was absent from duty, and he has been removed from service vide order dated 25/02/2012 passed by the Respondent No.3 without any proper legal inquiry, despite of accident and being badly injured, moreover the removal from service order was not conveyed to the appellant according to law.**(Copy of Removal Order dated 25/02/2012 is attached as Annex "C")**

7. That the appellant preferred departmental appeal against his Removal order before the Respondent No.2 which was dismissed being barred by time without adverting to other grounds, vide order dated 17/10/2019.**(Copy of Departmental Appeal & Order dated 17/10/2019 is attach as Annex "D")**

8. That the Appellant then filed Revision Petition before the Respondent No 1 and the same was also dismissed being barred by time (**Copy of Revisional Order is Attach as Annex "E")**

9. That the appellant being aggrieved from the impugned Revisional & Appellate order as well as initial order respectively dated 7/11/2019, 17/10/2019 & 25 /02 /2012 prefer this Appeal Before This Honorable Tribunal on the following grounds:-

GROUND

5
GROUND

- A. That the Revisional & Appellate Order as well as Initial Order of Respondents No.1,2 & 3 regarding the Removal of appellant from service is totally illegal, against the police rules and similarly the revisional & appellate authority also failed to exercise its authority properly and legally in the matter of dismissal of Revision & Departmental appeal of the appellant.
- B. That no proper inquiry was conducted in case of the appellant, what to speak of inquiry even the show cause notice and statement of allegation was not issued to the appellant and all the proceedings were carried out on the back of appellant, therefore all the impugned orders of Respondents No.1, 2 & 3 are in violation of Police Efficiency & Disciplinary Rules 1975 and nor the order of removal from service was conveyed to the Appellant.
- C. That the alleged charge of absence on the basis of which the appellant has been removed from service was not intentionally, to avoid his duty or willfully absent from duty, but due to serious illness and injured condition of the appellant who remained on bed and this fact was properly conveyed by the appellant to the authority through application for leave but the respondents did not bother to inquire about the accident / treatment of the appellant and straightaway removed the Appellant from service,

⑥

therefore the impugned order of Respondents are not based on any legal and properly proof, and liable to be set aside.

- D.** That no information by the competent authority has been given to the appellant by the Respondents regarding the inquiry neither the inquiry officer has summoned the appellant for appearance or asked the appellant to face the charge leveled against the appellant, therefore the alleged inquiry is an ex-parte inquiry, which has no legal sanctity and amounts to condemned unheard.
- E.** That after conducting the alleged inquiry & finding rendered by the inquiry officer no final show cause notice has been served on the appellant by the Respondents, which is also violation of law / justice and rules, therefore the impugned orders of respondents are not sustainable.
- F.** That the departmental appeal & Revision of the appellant was also dismissed by the appellate authority and Revisional authority without providing proper opportunity for defense, therefore the impugned orders of appellate authority & revisional authority is also suffered from legal infirmity and amounts to condemned unheard the appellant, which is against the natural justice.

- G. That the appellant has served the police department for sufficient time and in this period none of his superiors had ever made any complaint against the appellant, but the appellant had served the police force with great zeal and devotion, therefore the punishment imposed upon the appellant of removal from service is very harsh and does not commensurate with the alleged charge of absentia.

- H. That under the law the appellant is entitled for each and every piece of evidence / order / documents and the respondents have no authority to refuse the appellant any documents as under Article 19-A of the Constitution, the appellant has a right to information, which could not be refused but the Respondents with mala fide intention, did not supply the alleged inquiry as well as the alleged show cause notice and statement of allegations and other material relevant to the appellant's case, which further shows the mala fide intention of the Respondents.

- I. That the Appellant has not been treated in accordance with law not extended equal protection of law which is an inalienable right of appellant and deprived the appellant from his defense which is a violation of Article 10-A of the Constitution.

- J. That any other ground will be raised at the time of final arguments with the permission of the court.

It is therefore prayed that On acceptance of this Service Appeal the impugned Revisional & Appellate order as well as the initial order of Respondents dated 7/11/2019, 17/10/2019 & 25/02/2012 be set aside and the appellant be reinstated to his service with all back benefits.

Any other remedy which this August Tribunal deems fit and appropriate may also be granted to the appellant.

Sami Ullah

Appellant: Sami Ullah
Through

Muhammad Irshad Mohmand

Muhammad Irshad Mohmand
Advocate High Court

Atta Ullah Mashwani

& Atta Ullah Mashwani
Advocate

Off: 15-D Haroon Mension
Peshawar

Dated: -28/11/2019

(9)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No: /2019

Sami Ullah

(Appellant)

VERSUS

**Provincial Police Officer Khyber Pakhtunkhwa & Others
(Respondents)**

AFFIDAVIT

I **Sami Ullah (Blet No 1885) S/o Murtaza Khan R/o Mohallah Kandari Regi Aftize P/o Khas Tehsil and District Peshawar** do hereby solemnly affirm and declare that all the contents of the accompanied Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable court.

Sami Ullah
DEPONENT

Identified by

Muhammad Irshad Mohmand
**Muhammad Irshad Mohmand
Advocate High Court
Peshawar**



(10)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No:

/2019

Sami Ullah

(Appellant)

VERSUS

**Provincial Police Officer Khyber Pakhtunkhwa Peshawar &
others**
(Respondents)

ADDRESSES OF PARTIES

**Sami Ullah (Blet No 1885) S/o Murtaza Khan R/o Mohallah
Kandari Regi Aftize P/o Khas Tehsil and District Peshawar
(Appellant)**

VERSUS

1. **Provincial Police Officer Khyber Pakhtunkhwa Peshawar
C.P.O Peshawar.**
2. **Commandant Frontier Reserve Police KPK Peshawar Police
Line Peshawar**
3. **Deputy Commandant Frontier Reserve Police KPK Peshawar
Police Line Peshawar.**

(Respondents)

Sami Ullah
**Appellant: Sami Ullah
Through**

Muhammad Irshad Mohmand
**Muhammad Irshad Mohmand
Advocate High Court
Off: 15-D, Haroon Mension
Peshawar**

Dated: -28/11/2019

⑪ Annex "A"

FROM : S. P. FRP.

OFFICE KOHAT

FAX NO. : 09229260134

28 Nov. 2019 2:33PM P1

Attention!

S-1 Legal

LR

10/11/19

ENLISTMENT ORDER

Mr. Sami Ullah S/o Mustaza Khan

r/o Aftaza Razi

PS Razi Distt: Peshawar

is hereby Enlisted as Constable in BPS (5) with effect from _____

and allotted Constabulary No. 1885 He

Height 5' 11³/₄" Chest 34" X 36"

Education 10th D/O 10.3.1990

Age on enrolment 19 Years 08 Months 25 Days.

His service is purely on temporary basis and liable for termination at any time without any notice.

Amal Khan

DY: COMMANDANT,
Frontier Reserve Police,
N.W.F.P, Peshawar.

OB No. 1532

Date. 4/12/2019

ATTACHED

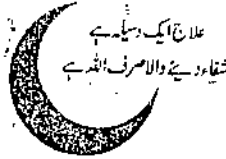
Neurosurgeon
Dr. Farooq Azam

MBBS, FCPS (NEUROSURGERY)
CONSULTANT NEUROSURGEON

Hayatabad Medical Complex Peshawar

Pt's Name: Sonullah I

Date: 30-4-11



Annex "B"

نیوروسرجن
ڈاکٹر فاروق اعظم

ایم بی بی ایس، ایف سی پی ایس (نیوروسرجری)

کنسلٹنٹ نیوروسرجن

حیات آباد میڈیکل کمپلیکس پشاور

Clinical Record

Rx

Backache in the leg,

DR 90°
SR 90°

urine R/L

9

2g medical

توتھ میں 2g میڈیکل

(7)

7ah Pauslay 11 7ah 7am 40

7ah mibel 6-4 7ah 7am 40

7ah Urim 10 7ah 7am 40

رابطہ کیلئے نمبر
0333-9259505

کلینک: کمرہ نمبر B-9 خٹک میڈیکل سنٹر ڈبگری گارڈن پشاور شہر

ATTESTED



Khyber Medical Laboratory

13

1st Floor Khattak Medical Centre, Dabgar Garden Peshawar City. Tel: 091-2581588

Dr. M. Riaz
MBBS FCPS-1-2
Khyber Teaching
Hospital Peshawar.

Mr. Saïd Akbar Khan
MSc. Biochemistry
Gomal University (Pak)

Mr. Mazhar Ali Khan
MSc. Biological Science
Gomal University (Pak)

NAME : SAMI ULLAH
SEX : MALE
AGE : ?
SPECIMEN : URINE
TEST REQUIRED : URINE R/E

DATE : 30/04/2011
TIME : 17:37:39
REPORT # : 1846
REFERED BY : DR.FAROOQ AZAM

URINE R/E

PHYSICAL EXAMINATION

Quantity	20 ml
Colour	Pale Yellow
pH	Acidic

CHEMICAL EXAMINATION

Albumin	Nil
Sugar	Nil

MICROSCOPIC EXAMINATION

Pus Cells	01 - 02	/HPF
Red Cells	Rare	/HPF
Epith Cells	Nil	/HPF

Lab Incharge *Ji*

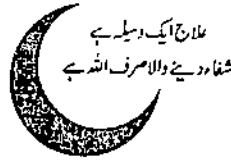
IMMUNOASSAY AUTOMATION ELISA (MEIA & FPIA) FACILITIES ARE ALSO PROVIDED FOR DIAGNOS

TESTED

Neurosurgeon
Dr. Farooq Azam

MBBS, FCPS (NEUROSURGERY)
CONSULTANT NEUROSURGEON

Hayatabad Medical Complex Peshawar



(14)

نیوروسرجن
ڈاکٹر فاروق اعظم

ایم بی بی ایس، ایف سی پی ایس (نیوروسرجری)

کنسلٹنٹ نیوروسرجن

حیات آباد میڈیکل کمپلیکس پشاور

Pt's Name: Saniatol J

Date: (2-6-11)

Clinical Record

Rx

Ba kach / Pa ly,

Dr

Tab

Intauctin 100

3

11

Tab

Furapow 2

3

11

Tab

Suber 2

4

11

Dr

رابطہ کیلئے نمبر

0333-9259505

کلینک: کمرہ نمبر B-9 خٹک میڈیکل سنٹر ڈگری گارڈن پشاور شہر

ATTESTED

15



کے والد

Neuro Surgeon

Dr. Mumtaz Ali

MBBS, FCPS (Neurosurgery)

Department of Neurosurgery Postgraduate Medical Institute

Govt. Lady Reading Hospital Peshawar (Pakistan).



15 JUL 2011

H/O Trauma 21

LBP

SLR (N)

R

Tae ROTEC

14

3

Tae MOWAX

14

Cap Ruling

14

Tae Ufrim

14

Handwritten signature

Marhaba Poly Clinic Rehman Baba Colony Peshawar

Handwritten signature

ATTESTED

Small printed text at the bottom



16

PATIENT NAME : Sami Ullah
SEX : Male
AGE : ?
REFERRED BY : Dr. Muntaz Ali Sb
TEST REQUIRED : FBC, ESR, RA FACTOR & RBS & UREA.

DATE : 15/07/2011
TIME : ?
LAB. NO : 14
SPECIMEN : BLOOD

TEST	RESULT	NORMAL VALUE
Haemoglobin	12.1 G/dl	12----16 G/dl
TLC	8900 /Cmm	4,000----11,000 /Cmm
DLC:-		
Neutrophils:	61 %	40----70 %
Lymphocytes:	36 %	20----40 %
Eosinophils:	02 %	00----06 %
Monocytes :	01 %	06----10 %
ESR (Westergren) :	17 mm/1st hr.	
RA FACTOR Latex Agglutination Test	"NEGATIVE "	
Blood Sugar (RS)	128 mg/dl	Upto 160 mg/dl
Blood Urea	18 mg/dl	14 ----50 mg/dl

MARHABA
Medical Lab


Signature

Rehman Baba Colony Dabgari Garden Peshawar

ATTESTED

Rehab Care Clinic

17



Mohammad Bin Afsar Jan

Neuro physiotherapist

MSPT (Aus), GCRS (Aus) BSPT (Pak)

Institute of Physical Medicine & Rehabilitation
Karachi

Dow University of Health Science,

Khyber Medical University, Peshawar

Liaqat National Hospital, Karachi

Assistant Professor

Visiting Faculty

Age: 27

Sami Ullah

Date: 15/7/14

C/o: LBP

of 25-

Exe-

- Reflexes: ↓↓
- Weak m/s Scapular stab, Ham, hip ext. AS Flex.
- Tight- Trap, hip flex, AS ext.
- M/s Power 3+
- weak Plant/Dorsi flex.
- Neck ROM: Ext ↓

- i) STW Trap.
- ii) Stretches Tight m/s.
- iii) Strengthening Prog.
- iv) Scapular Stability
- v) Posture/PT Education

Δ Scapular Instability

Δ Muscular Dystrophy??

15/7/14

ATTESTED

Dr. Hamran Burhan
M.B.B.S. (Pesh) MRCP (UK)

تھرو ڈیوٹی کلینک

ڈاکٹر کامران برهان

کرو نمبر ۷، اسی خیبر میڈیکل سنٹر
ڈبگری کارڈن پشاور

- ۱: نائٹ لوگ کیت کریں۔
- ۲: دوکھت ملوڑا مابیات نہ کریں۔
- ۳: کمرات سے استفسار کرتے رہیں۔
- ۴: اپنی استطاعت کے مطابق صاف کریں۔

ایم ای بی ایس ایم آر سی پی (ایکے)
ایکے سے دو پہرا بجے تک
تفصیلی ریزومہ مفت و آثار

Saminullah

18/8/11

Lower Thoracic Back pain

rest / activity - 1 1/2

Headache, ↓ sleep

ع
ب
و
Tanger
Depress
Palp

ایک ہفتہ مکمل آرام اور صحت پر

- Prolen domp 1 00

- Sensival 2 2 1/2

- Biersid tab 1-1

- Mervin tab 1-1

- Mergal 1-1

ایک ہفتہ نو آرام

(Signature)

پری مشنل، بدخادر جمعات 9 بجے دو پہرا بجے تک

ارتات کار:

(Signature)

0300-9326739-0343-9007750 موبائل نمبر: مریضوں کے لئے سائبر منف ہوگا۔

ATTESTED

(19)

MRI. Thoracic & Lumbar
Spine

Indrap D. G.

(P) - 20 - 10 - 2011

Cstobalium by

day 3



ATTESTED



PESHAWAR MEDICAL IMAGING

Rehman Baba Colony, Dabgari Gardens, Peshawar.
Tel: +92-91-2592838-9 Fax: +92-91-2550694

20

Radiologist

Dr. Abid Ali Qureshi
M.B.B.S, F.C.P.S
Asst. Professor of Radiology
The Children's Hospital and
Institute of Child Health, Lhr

Patient Name : Sami Ullah
Patient Age : 21 Years / Male
Patient R. Date : 05.10. 2011
Patient Referred : Dr. Kamran Burhan

MRI THORACO-LUMBAR SPINE

History:

Discussion: T1W and T2W sequences were performed in sagittal and axial planes through thoraco-lumbar spine.

Vertebral bodies show normal signal and morphology. All visualized intervertebral discs demonstrate normal MR signals. Normal MR signal and morphology through the visualized thoracic cord with conus lying in its normal location. No intra or extra medullary mass is noted. No evidence of compressive disc disease. There is no evidence of Disco-vertebral Osteomyelitis. Posterior osseous elements and paravertebral soft tissue are normal.

Impression:

- Normal MRI thoraco-lumbar spine.

Dr. Abid Ali Qureshi
Consultant Radiologist

Thank you for referral. This is a computer generated report

ATTESTED



POSTGRADUATE MEDICAL INSTITUTE
HAYATABAD MEDICAL COMPLEX Peshawar
PESHAWAR

Out-Patients Department

Name Wife / ROSHNA / Female / Age 40

Department _____ Address _____

Hospital Yearly No. _____ Dated _____

History

R/-

Burkade

Clinical Examination

R 9NS
Neurmet

Provisional Diagnosis

1) FP/PP/INT
⑥

Investigations Required

Physiocalc 70h Volten 5
2 1+1+
70h Paracetamol 4

ATTESTED

Dr. Muhammad Tariq Safi
Professor of Neurosurgery
FRCS (Edin), FRCS (Glasgow),
FRCS (Dublin)



ڈاکٹر محمد طارق صافی
پروفیسر آف نیوروسرجری
ایف آئی ایس (ایڈنبرا) ایف آئی ایس (گلاسگو)
ایف آئی ایس (ڈبلن)

Website: www.pimc.edu.pk

Peshawar Institute of Medical Sciences
Phase-5, Plot-2 Sector B-2, Hayatabad
Peshawar - Pakistan.
Tel: +92-91-5892730-7 Fax: 92-91-5892739

پشاور انسٹیٹیوٹ آف میڈیکل سائنسز
فیز 5، پلاٹ 2، سیکٹر B-2 حیات آباد پشاور پاکستان
فون: +92-91-5892730-7 فیکس: +92-91-5892739

Date 09 MAY 2012

Saminullah

214

Asadkhan

MRI LIS-2

R Cap Nexa
HU
ES 20ml 40
HU

Wb /

Zylar 200
HU

Soft cervical collar

Joy
HU
HU
HU

Wb /

This Document is Not Valid For
Medico Legal Purpose

تعمیل روز اتوار

95 سے 5 تک

پشاور انسٹیٹیوٹ آف میڈیکل سائنسز پشاور

ATTESTED

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

RS: 10/-



S.No: 237737

Patient ID: 9303000712
Name: SAMI ULLAH
Gender: MALE
Referred To: *[Signature]* 21 YEARS
Date: 16-JUL-12
Address: PESHAWAR
Time: 10:15:07
Ret. 10

Cap Baricitabine

Tab Erimin 75mg

CSS

Tab Casicef 400mg

CSS

Tab Skelgesic

CSS

ATTESTED

Khyber Teaching Hospital, Peshawar OUT - PATIENTS DEPARTMENT

RS-10/-



S.No. 422595

Pain in Neck & low back

*Rx. - Tab. Hamilcam 20mg
i.i.d. ①*

Patient ID: 0412100712

Name: SAMI HILCH

Gender: MALE

21 YEARS

Form: 10

Referred To: MEDICINE

Date: 25/03/12

Time: 10:23 AM

Address: PESHAWAR

*- Tab. Opicid
i.i.d. ①*

*- Tab. Capso
i.i.d. ①*

*- Cap. Enoxix 15mg SR
i.i.d. ①*

*- Cap. Eper 40mg
i.i.d. ①*

ATTESTED



Department of Pathology
Plot #2, Sector B-2, Phase-5,
Hayatabad Peshawar.

پتھالوجی ڈیپارٹمنٹ
پلاٹ نمبر 2 سیکٹر B-2، فیز 5، حیات آباد پشاور

26

Name:	Samitulah	Date Time:	5/9/2012 11:36:53 AM
Sex:	Male	Referred by:	Dr. Muhammad Tariq Saif
Test:	Investigation	Lab No:	80603

Chemistry

Test	Results	Units	Normal Ranges:
Calcium	9.6	mg/dl	8.5-----10.5
Uric Acid	5.1	mg/dl	Male: 3.5-----7.0, F: 2.5-----6.0
Glucose-Random	116	mg/dl	75-----140
Serology			
Rheumatoid Factor	14	UI/ml	30
ASO Titer	461	UI/ml	Adult : 200 Children (Less than 02 year): 150 Children (School Age): 250

Prof. Dr Sajid Shah
M.B.B.S F.C.P.S
Consultant Histopathologist
Director Path Labs

Prof. Dr Khalid Bokhari
M.B.B.S M.Phil
Consultant Chemical Pathologist

Prof. Dr Tabira Zaffar
M.B.B.S F.R.C Path (UK)
Consultant Hematologist

Prof. Dr Shohid Rali
M.B.B.S F.C.P.S
Consultant Microbiologist

Clinical correlation is suggested. In case of any discrepancy, please discuss so that test can be repeated and further analysed.
It is not valid for Court of law.

Authorized by:

Fax: 5892739

ATTESTED

DATE

No.

Rs. 9/-

GOVERNMENT DEPARTMENT

NAME

Samullah

THREAT NO

DATE

17-11-13

OFFICE

FACE VALUE RUPEES &

*to
incomplete
defecation*

Flag

10

0.7

Nov date 500

10

unm...

Formal

10

Dam... 32

ATTESTED



POSTGRADUATE MEDICAL INSTITUTE
HAYATABAD MEDICAL COMPLEX
PESHAWAR

R
Y

Sami Ullah

27 Years Male
Accident & Emergency Service Deptt

Name 130428031 Adm. Apr 2012 Sex

Address

Hospital Yearly No. Dated

AYAZ / EVENING / 15:33:58

Rate :- 10

Pl. Status.

D.O.TI

Pl. Hist.

Tab. Cipral 500mg
WS - 1H

Clinical Examination

Tab. Zeepp
WS - 1H/1H

Provisional Diagnosis

Tab. Voltal 50mg
WS - 1H

Investigations Required

Cap. Helezole 20mg
WS - 1H

Handwritten signature and date: 27/4/12

APPROVED



KUWAIT TEACHING HOSPITAL PESHAWAR MEDICAL COLLEGE

Rs 60



Abdara Chowk, Jamrud Road, Peshawar-Pakistan Ph: 091-5853486 / 5711418

OPD Consultation Form

Male Counter

Name: **SAMI ULLAH** Age: 22 Years Gender: M Address: Peshawar Weight: kg Date: 10-05-13 10:23:40 AM

Consultant: **Dr. Rehmat Ullah** Last Visit: -- Department: **Surgery** MRN: **2013-05-34115**

1-3 اپنا MRN نمبر یاد رکھیں۔ اور دوبارہ آنے کی صورت میں یہ نسخہ ضرور ساتھ لائیں۔

Diagnosis:

Lt Flank Pain & weakness
on 10FF constipation

✓ Hx. of Fever
- Polyarthralgia

Complaints:

o/e: mild tender Lt. Flank

Adx

ULS Abt Pelvis
Ur in R (E)
urine FS

U/S

Ro
= Tab. Cipval 500mg
1+1

Tab. Ceflam 500mg
(+)

Syp. Citrates.
2+2+2

Ref to Med OPD
for raised ASO Titer

اپنی زبانی (5) مائیکریسی

Amikacin 1.2 lakh units IM - every
month.

ESR.

Dr. Naveed

ATTI (STED)

30



KUWAIT TEACHING HOSPITAL

ABDARA CHOWK, UNIVERSITY ROAD, PESHAWAR - PAKISTAN.
TEL: 091-5853486, 6711418 - EXT 106, FAX: 091-5843968



DEPARTMENT OF PATHOLOGY

MRN	2013-05-34115	Lab No	30055
Name	sami ullah	Date	10 / 05 / 2013
Gender	M	Age	22
Ref. By	Dr. Rehmat Ullah	Specimen	Blood

Test	Result	Reference Range
SEROLOGY		
ASO Titre	> 400 < 800IU/ml	(< 200)

NOTE:
 This is a computer generated report and does not require signature.
 In case of any clinical discrepancy, the test will be repeated free of cost, with in 24 hours of the report.

ATTESTED



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TEL: 091-5853486, 5711418 - EXT 106, FAX: 091-5843968



DEPARTMENT OF PATHOLOGY

MRN	2013-05-34115	Lab No	30055
Name	sami ullah	Date	10/05/2013
Gender	M	Age	22
Ref. By	Dr. Rehmat Ullah	Specimen	Urine

Test	Result	Reference Range
URINE R/E		
Physical Examination		
Color	P/Yellow	
Chemical Examination		
pH	Acidic	
Proteins(Albumin)	NIL	
Sugar	NIL	
Microscopic Examination		
Pus Cells	01---02/HPF	
Red Cells	Rare/HPF	

NOTE:
 This is a computer generated report and does not require signature.
 In case of any clinical discrepancy, the test will be repeated free of cost, with in 24 hours of the report

ATTESTED

32



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TEL: 091-5853486, 5711418 - EXT 106, FAX: 091-5843968



DEPARTMENT OF PATHOLOGY

MRN	2013-05-34115	Lab No.	30072
Name	sami ullah	Date	10 05 2013
Gender	M	Age	22
Ref. By	Dr. Rehmat Ullah	Specimen	

Test	Result	Reference Range
HEAMATOLOGY		
ESR	10mm/1st hrs	(00 - 20)

NOTE:
This is a computer generated report and does not require signature.
In case of any clinical discrepancy, the test will be repeated free of cost, with in 24 hours of the report

AI LAB

33



PESHAWAR MEDICAL COLLEGE KUWAIT TEACHING HOSPITAL

ABDARA CHOWK, UNIVERSITY ROAD, PESHAWAR - PAKISTAN.
Tel: 091-5711432, 091-5853486, 5711418 - Ext: 106, Fax: 091-5843968



DEPARTMENT OF RADIOLOGY

Pt. Name: Sami Ullah
Sex: Male

Age: 22 yrs
Date: 10/05/2013

Ref by: Med-OPD

U/S ABDOMEN & PELVIS

Few concretions are seen in left kidney without obstructive changes.

Right Kidney is normally situated, having smooth cortical echopattern. No calculi, hydronephrosis or mass lesion seen.

Liver is of normal size, shape and parenchymal echotexture. No focal lesion is detectable.

Portal vein caliber is within normal limits.

Gall bladder shows normal wall thickness. No stone sludge or mass lesion seen in it.

Extra- and intrahepatic biliary channels have normal caliber.

Pancreatic head, body and tail have normal size and parenchymal echotexture.

Spleen is of normal size having normal parenchymal echotexture. No focal lesion seen.


No free or loculated fluid is seen in the peritoneal cavity.

No para-aortic lymphadenopathy seen.

Urinary bladder is suboptimally filled.

Impression:

- Left renal concretions without obstructive changes.


Dr. Ghazala Wahid
Junior Registrar

ATTESTED



85 (34)

KUWAIT TEACHING HOSPITAL PESHAWAR MEDICAL COLLEGE

Rs 60



Abdara Chowk, Jamrud Road, Peshawar-Pakistan Ph: 091-5853486 / 5711418

OPD Consultation Form

Male Counter

Name: SAMI ULLAH **Age:** 23 Years **Gender:** M **Address:** Peshawar **Weight:** kg **Date:** 17-05-13 09:37:49 AM

Consultant: Dr. Rehmat Ullah **Last Visit:** -- **Department:** Surgery **MRN:** 2013-05-35723

1-3

اپنا MRN نمبر یاد رکھیں۔ اور دوبارہ آنے کی صورت میں یہ نسخہ ضرور ساتھ لائیں۔

Diagnosis:

- Polyarthralgia
- Neckache.

ASO titer >400.

Advised 1m Benzobiotic
injection by
medical colleagues.

Complaints:

R_s
=

Tab. Morax 2mg

1-1-1

10 @ 20

Tab. Trobar 100mg

1-1-1

درد پس کا علاج جاری رکھیں

ATTESTED

Consultant's Signature

~~AR~~

X.R Cervical spine
AP LSL

R₂

Tab Mylex 4000

1-1-1

Tab. Porexin

1-1-1

Tab Cystone

1-1-1

2 (2)

[Handwritten signature]

دکتر محمد علی نوروزی

کلیه: غیر متزلزل سند پزشکی

دکتر محمد علی نوروزی
کلیه: امان متزلزل سند پزشکی

ATTESTED



PESHAWAR MEDICAL COLLEGE
Diagnostic and Research Laboratories
 Warsak Road, Peshawar, Pakistan.

36

Tel: 091-5200982-3, Ext: 130
 Fax: 091-5200980
 Email: dignostics@pmc.primc.edu.pk
 Website: www.pmc.primc.edu.pk

Prof. Dr. Sajjad Ahmad
 MBBS, M.Phil, Ph.D
 Professor & Head Pathology Department

OPD No _____
 ID No 4305/B
 Lab Report No 34/5
 Date: 20/5/2018

Name: Samiullah Age 25 Sex M
 Bed No _____ Ward _____ Hospital _____ Referred by: MT/H

Specimen: Urine Examination required CS

LABORATORY REPORT
Microscopic Examination
 (The Deposit/ Smear shows)

Direct: _____

Grams stain: _____ Z.N. Stain _____

(CULTURE (Aerobic/ Anaerobic))

Culture Yielded: No growth at 37°C after 24 hours/days Incubation.

Remarks: _____

Lab. Technologist

Prof. Col (R) Mahmud Ur Rehman
 MBBS, M.Phil (Micro) FCPS (Micro)
 Consultant Microbiologist

ATTENDED

37

Counter / Main OPD

Lady Reading Hospital

Peshawar

Rs. 10/-

Out-Patients Department

Yearly No:

Room

Date:

Name: 5702641013

7

04-OCT-13 09:45:13

OPD:

CASH/PAID

MEDICAL (MALE)

EM/Other

فری ایجوکیشن سروس کیلئے 137 پر کال کریں۔

Pain Nuchal

Spine

Spine

Act with

OB. Nuchal

of Cervical

neck

171

Spine

lateral view

M/L

OB

Sinuous extra

M/L

171

Sp

Flex

M/L

ATTESTED



Lady Reading Hospital Peshawar Out-Patients Department

38

Yearly No:

6331351113

Room

7

Name:

EMMULLAH

Age: 23

(OPD) - 1150412

F.H Name (KHA): - فری ایجوکیشن سروس کیلئے 137 پرکال کریں

c/c:

- Burning micturition
- Left lumbar pain
- Constipation

N. S. S. S.

tab Muberal
Jade

5/10 - 1+1

ATTESTED

Professor

Dr. Manzoor Ahmad Khan

M.S ORTH., F.I.C.S., F.C.P.S., F.P.A.M.S., F.B.O.A., M.I.S.P.O., M.I.C.D.R

WINNER OF LIFE TIME ACHIEVEMENT AWARD,

FROM SICOT, AIMS, SAARC, AND PAK, ORTH, ASSOCIATION FOR
OUT-STANDING SERVICES FOR ORTHOPAEDIC SURGERY

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Medical College, Peshawar.
Dean, Faculty of Medicine
University of Peshawar.

Head of Orthopaedic Department
Khyber Medical College
Visiting Orthopaedic Surgeon, K.T.H.
Honorary Director, Artificial,
Limb Centre/Petcol. Peshawar.

Honorary Consultant Orthopaedic Surgeon
Pakistan Air Force Peshawar.
Honorary Group Captain P.A.F.
Honorary Consultant Orthopaedic Surgeon
UNHCR/PRCS. Peshawar.
Honorary Chairman, Bom, Pipes.

Winner Of The Man Of The Year Award For 2009,
From American Biographic Institute,
For Out-Standing Services For Pakistan.
Consultant Orthopaedic Surgeon

Phone: (091)5851947
(091)5851138
6-B Park Road,
University Town,
Peshawar.

09 DEC 2013

Sacmialat

Waltrol 7cl
~~*Waltrol 7cl*~~
Waltrol 1+1

Inflarox 7cl
~~*Inflarox 7cl*~~
Waltrol 1+1

Deptra 7cl
~~*Deptra 7cl*~~
Waltrol 1+1

Selenium 7cl
~~*Selenium 7cl*~~
Waltrol 1+1

Pollen B 7cl
~~*Pollen B 7cl*~~
Waltrol 1+1

ماہنامہ نکرین

ATTESTED

Professor
DR. MANZOOR AHMAD KHAN
M.S Orth., F.I.C.S., F.C.P.S., F.P.A.M.S.
F.B.O.A. M.I.S.P.O. M.I.C.D.R

Professor
DR. MANZOOR AHMAD KHAN
M.S. ORTH., F.I.C.S., F.C.P.S., F.P.A.M.S.
F.B.O.A., M.I.S.P.O., M.I.C.D.R
Consultant Orthopaedic Surgeon

Professor

Dr. Manzoor Ahmad Khan

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Head of Orthopaedic Department
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Visiting Orthopaedic Surgeon, K.T.H.
Honorary Director, Artificial,
Limb Centre/Petcol. Peshawar.
Honorary Consultant Orthopaedic Surgeon
Pakistan Air Force Peshawar.
Honorary Group Captain P.A.F.
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UNHCR/PRCS. Peshawar.
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Consultant Orthopaedic Surgeon

Phone: (091:5851947
(091:5851138
6-B Park Road,
University Town,
Peshawar.

11 JAN 2014

Samullah

*Mobiler Phys Cap
Lith 1+1
Pissomed
Lith 1+1
Pantular
Lith 1+1
Adegal
Lith 1+1
Lith 1+1*

الاش کریں

ATTESTED

Professor
DR. MANZOOR AHMAD KHAN
M.S ORTH., F.I.C.S., F.C.P.S., F.P.A.M.S., F.B.O.A., M.I.S.P.O., M.I.C.D.R
Consultant Orthopaedic Surgeon

DR. MANZOOR AHMAD KHAN
M.S. ORTH., F.I.C.S., F.C.P.S., F.P.A.M.S.
F.B.O.A., M.I.S.P.O., M.I.C.D.R.
Consultant Orthopaedic Surgeon

41

Professor

Dr. Manzoor Ahmad Khan

M.S. ORTH., F.I.C.S., F.C.P.S., F.P.A.M.S., F.B.O.A., M.I.S.P.O., M.I.C.D.R.

WINNER OF LIFE TIME ACHIEVEMENT AWARD.

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OUT-STANDING SERVICES FOR ORTHOPAEDIC SURGERY

Ex. Consultant. Principal Khyber
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Honorary Consultant Orthopaedic Surgeon
Pakistan Air Force Peshawar.
Honorary Group Captain P.A.F.
Honorary Consultant Orthopaedic Surgeon
UNHCR/PRCS. Peshawar.
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Consultant Orthopaedic Surgeon

Phone: (091)5851947
(091)5851138
6-B Park Road,
University Town,
Peshawar.

14 FEB 2014

Samiullah

✓ Ternelin 7h 2mgm
W.C.T 1+1
~~Dexamethasone~~ BC 20 7h
W.C.T 1+1
Aplon 7h
Emergin cap
W.C.T 1+1
E sold 7h
Calcane 7h
W.C.T 1+1

ماشاء اللہ کریں

Professor

DR. MANZOOR AHMAD KHAN

M.S. ORTH., F.I.C.S., F.C.P.S., F.P.A.M.S.

F.B.O.A., M.I.S.P.O., M.I.C.D.R.

Consultant Orthopaedic Surgeon

ATTESTED

(42)

Khyber Teaching Hospital, Peshawar OUT - PATIENTS DEPARTMENT

Rs. 10/-



173

S.No: 36980

Patient ID: 17827930514

OPD

Name: SAMI ULLAH

Gender: MALE 24 YEARS

Rate: 10

Referred To: ORTHROPAEDIC

Date: 31-MAY-14 Time: 11:18:07

Address: PESHAWAR

*Pain in Neck and
upper Back ... 3 years
Hx of Spain to Neck. 3 yrs.
No Improvement in treatment*

ATTESTED

(44)

Asst. Pharm by MS
21/10/2014
Ravi Kumar
Senior Superintendent
Sri Lanka State Training Hospital

S. No: 790/14
Reg No. 18063560614

Name: Samudra

Age: 24y Sex: M

Diagnosis: C6-7 Radiculopathy

Treatment:

1. Cervical Traction

2. MWD

3. Active neck/shoulder exs

4. _____

Treatment Sessions:

S. No.	Date	Sign	S. No.	Date	Sign
01	19/6	[Signature]	08		
02	21/6	[Signature]	09		
03	23/6	[Signature]	10		
04	24/6	[Signature]	11		
05	25/6	[Signature]	12		
06	26/6	[Signature]	13		
07	27/6	[Signature]	14		

Progress Notes:

Physical Therapist

[Signature]

ATTESTED

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

45

Rs: 10/-



S.No: 163952

Patient ID: 181337306149
Name: SAMI ULLAH
Gender: MALE | 23 YEARS
Referred To: ORTHOPAEDIC
Date: 21 JULI-14
Address: PESHAWAR

ATTESTED

(46)

Dr. Khushnood Ali Baz

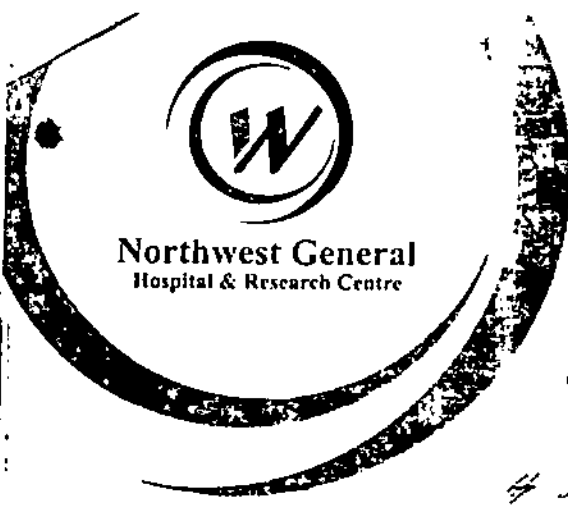
M.D., M.S (Ortho) Ph-D (Ortho)

Orthopaedic & Hand Surgeon

Sector A-3, Phase-V, Hayatabad, Peshawar.

Ph: 091-5822612-21, Fax: 091-5822620

Email: kabaz@nwgh.pk, Web: www.nwgh.pk



Northwest General
Hospital & Research Centre

Samueli

Date: 20/11/2014

4 braces 1.5m
 2 J Level 2 1.5m
 3 For Cobane 1.5m
 1 For [unclear] 1.5m

[Handwritten signature]

..... اور بعد معائنے کیلئے تشریف لائیں۔

A project of ALLIANCE HEALTHCARE (Pvt) Ltd.

زحمت سے بچنے کیلئے مریضوں سے درخواست ہے کہ ڈسٹ کیلئے پیشگی نمبر حاصل کریں۔

ATTESTED



QUANTUM BODY ANALYZER

(Bone disease)
Data Analysis

(47)

Name: sami ullah

Sex: Male

Age: 24

Figure: Standard body weight(182cm,69kg)

Testing Time: 2014-12-27 15:38

Actual Testing Results

Testing Item	Normal Range	Actual Measurement Value
Lumbar Fiber Protruding Dimension	No Direction	No Direction
Adhesion Degree of Shoulder Muscle	< u0.2	u0.17
Limbs Circulation Limit	+	+
Age of Ligament		

ATTACHED

HOMOEOPATHIC GENERAL CLINIC

Clinic Registration No. HRA / 500 / R / PR / HP / 96. NCH Registration No. 41439

ڈاکٹر محمد عثمان
ہومیوپیتھک
ایم ایف ایچ



ڈاکٹر کلثوم صدیقی
ہومیوپیتھک
ایم ایف ایچ

D.H.M.S. (Pesh), R.H.M.P.
Member Pakistan Homoeopathic Medical Association

D.H.M.S. (Pesh), R.H.M.P.
Lecturer Khushaf Homoeopathic Medical College

Name & Add: سمیع اللہ - رنگے

Date: 27/12/2014

1) Cap. Embryonum 15
ایم ایف ایچ

40
- Neckache.
- Cervical
spondylitis.

2) Tr. Kamul 30
ایم ایف ایچ
1300

3) Tr. P.E.P. 30
ایم ایف ایچ

4) O. Paris 2
ایم ایف ایچ

[Signature]
27/12/14

جو کہ وزن کا کم ہونے سے - جو مائیکرو اسٹیمائٹس ہیں

ایڈریس: ہومیوپیتھک جنرل کلینک، گلشن برودر ہسپتال ٹاؤن، باغیچہ گلشن، گلشن، لاہور۔
اوربٹل نمبر: 091-2262443

ATTESTED

49

HOMOEOPATHIC GENERAL CLINIC

Clinic Registration No. HRA / 500 / R / PR / HP / 96. NCH Registration No. 41439

ہومیوپیتھک
ڈاکٹر محمد عثمان
ہومیوپیتھک
D.H.M.S. (Pesh), R.H.M.P.
Member Pakistan Homoeopathic Medical Association



ہومیوپیتھک
ڈاکٹر کلثوم صدیقی
ہومیوپیتھک
D.H.M.S. (Pesh), R.H.M.P.
Lecturer Khushal Homoeopathic Medical College

Name & Add: سمیع اللہ - ریگت

Date: 10 JAN 2015

- 22 JAN 2015 40
- ① Tar Peeli / Chai ③۰
۱۱۲۱ کانت - لہ
① P.C.P. ⑤۰
۱۱۲۱ کانت - لہ
- Neckache.
- Cervical.
- Spondylitis.
 - ② Tar Cabal ②۰
۱۱۲۱ کانت - لہ
② Cap Sars ①۵
۱۱۲۱ کانت - لہ
③ Siltan ⑤۰
۱۱۲۱ کانت - لہ
 - ③ Vitis Prins ③۰
۱۱۲۱ کانت - لہ
تول = ۱۶۶۵
۲۲/۱/۱۵
 - ④ Golden Star ②۰
۱۱۲۱ کانت - لہ
تول = ۲۴۲۵
۲۰/۱/۱۵
۲۰۰۰
تول = ۲۰۰۰
تول = ۲۰۰۰
- بوجہ وزن کا کاپیہ - حوثا تلبہ استعمال نہ کرے۔

ہومیوپیتھک جنرل کلینک کراچی یورہ نزد بلال ٹاؤن بالقابل شہر آباد جی ٹی روڈ شاپار
اور سات شورہ: ۹ بجے ۱۲ بجے دوپہر، شام ۴ بجے ۷ بجے روزانہ - طبی سہولتیں بروڈ الوار ٹون 091-2262443

ATTESTED

(50)

مہدیو پیننگ جرنل کلینک، فارم پیسی

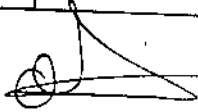
CASH MEMO

No 124043

Date 10/1/15

Name دستی

Qty	Particulars	Rate	Amount
30	Tab Peeli Goli	10	300
20	Tab Cobal	200	200
1	Vita-Pain	365	365
20	Golden Jar	25	500
	D & F	300	300

Sign 


1500 روپے

Total 1665

ATTESTED

(51)

ہومیو پیتھک ہیرال گائیڈ فارمیسی

CASH MEMO

No 124242

Date 22/1/15

Name علی

سید علی

Qty	Particulars	Rate	Amount
50	P.E.P	10	500
15	cup Shan	375	375
50	Silver Jm	25	1260
	D.V.F	300	300

ATTESTED

HOMOEOPATHIC GENERAL CLINIC

Clinic Registration No. HRA / 500 / R / PR / HP / 96. NCH Registration No. 41439

ہومیوپیتھک
ڈاکٹر محمد عثمان
ہومیوپیتھک

D.H.M.S. (Pesh), R.H.M.P.
Member Pakistan Homoeopathic Medical Association



ہومیوپیتھک
ڈاکٹر کلثوم صدیقی
ہومیوپیتھک

D.H.M.S. (Pesh), R.H.M.P.
Lecturer Khushal Homoeopathic Medical College

Name & Add: سید علیہ - ریگے

Date: 21 MAR 2015

۲

۱۰

① TM P.E.P. ② ③

۱+۱

- Neckache

- Dribbling of

Urine

② Herb marrow

۱+۱

21.8.15

③ J - Bains TM ②

۱+۱

T - 20.10
R - 20.00

④ Tartrate Crp ③

۱+۱

21/3/15

⑤ ARV Palina

۱+۱

بو جو - وزن کا

091-2262443

AT (ESTED)



QUANTUM BODY ANALYZER

QBA, ECG, ULTRASOUND & CLINICAL LABORATORY

53

Name: Samiullah
Date: 21 Mar 2015

Sex: Male
Referred By: Dr Usman

Age: 24 Y

Both kidneys show normal in size, shape with echogenic calyx. No calculus seen.

Liver is normal in volume & wall thickness. No focal lesion seen. Portal vein is of normal size.

Gall bladder is normal in shape, size and echotexture.

Pancreases and spleen is normal in size shape and echotexture, no focal lesion noted.

Enlarged abdominal lymph nodes seen. No ascities seen.
Gas bubbles seen in generalized abdomen.

Urinary bladder is empty that's why pelvic ultrasound not possible.

CONCLUSION:

ENLARGED ABDOMINAL LYMPH NODES, GAS BUBBLES IN GENERALIZED ABDOMEN.

Dr Kulsoom
Dr Kulsoom

URINE EXAM

pH: Alkaline
Albumin: Nil
Glucose: Nil

ATTENDED

(54)

موسسه تنظیم و نشر کتاب ایران


CASH MEMO

No 125194

Date 21-3-1357

Name (P) معاد

Qty	Particulars	Rate	Amount
80	P.E.O.	10	800
1	4/8 Manif.	80	80
2	Drain	360	720
3	Ten wire. 20.	150	450
1	ARG Pochini	150	150
	DR Pcc	—	800

Sign 

2000

Total 2010

ATTESTED

CRP CASH RECEIPT
CMH PESHAWAR

(55)

Date 18.5.15 No. 57624

Name Samiullah

S/O, D/O, W/O _____

Age _____ Sex M No. of Visit 1

Address PSC

Tel _____

Physician Dr. Javed Khan

Amount Paid in Cash Rs _____

in words 1000/-

Sig. & Stamp

اطلاع ہر انفر سبیل مریضیان
کی ایم ایچ پیٹرن میں ہر قسم کی فیس صرف CRP کاؤنٹر پر ہی کی جائے گی۔ اور سید ضرور حاصل
کریں۔ اگر آپ کو کسی قسم کا نینٹ یا دیگر دوائی دینے کا مشورہ ملے تو اس کی فیس بھی
CRP کاؤنٹر پر ہی کی جائے گی اور کسی دوسری جگہ حاصل نہیں کریں۔ مطلع کیا جاتا ہے کہ CRP کاؤنٹر
کے علاوہ ہسپتال کے کسی اور گھنٹے کا فیس لیا جاتا ہے۔ فیس جب بھی دیں اور سید
ضرور حاصل کریں۔ شکایت یا کسی مشکل کی صورت میں ہسپتال انتظامیہ سے رابطہ کریں۔

ATTESTED

CRP CASH RECEIPT

CMH PESHAWAR

(56)

Date 18-5-15 No 23826

Name Samiullah

S/O, D/O, W/O _____

Age 24 Sex F

Address Pee Tel _____

Physician _____ Disease _____

Investigation done _____ Charges _____

1. M.B.C. Spine Rs. 5000

2. _____ Rs. _____

3. _____ Rs. _____

4. _____ Rs. _____

5. _____ Rs. _____

6. _____ Rs. _____

7. _____ Rs. _____

Total Amount to be Paid Rs. 18/5/15

(In words) Six hundred only

[Signature]

[Signature]

[Signature]

ATTESTED

HOMOEOPATHIC GENERAL CLINIC

Clinic Registration No. HRA / 500 / R / PR / HP / 96. NCH Registration No. 41439

ڈاکٹر محمد عثمان
ہومیوپتھک
ہومیوپتھک

D.H.M.S. (Pesh), R.H.M.P.
Member Pakistan Homoeopathic Medical Association



(57) ڈاکٹر کلثوم صدیقی
ہومیوپتھک
ہومیوپتھک

D.H.M.S. (Pesh), R.H.M.P.
Lecturer Khushal Homoeopathic Medical College

Name & Add: سید علیہ - راجہ Date: 22-17-15

C/o - Neckache
- red pain on
movement R/L up/down
Constipation

R ① Tab Kali Phos (40)

R ② Tab Komb (20)

T 29.80 ① R 28.00 ③ D - faint pain (2)

B. 300 ④ Cap Nat Phos (40)

⑤ Tab Nuxy (20)

⑥ Cap Tab - (10)

091-2262443

ATTESTED

58

هوٽيل ۽ ٽوراڻي جا ڪاروبار

CASH MEMO

No 127308

Date 22/7/15

Name (K) M. I. Khan

Qty Particulars Rate Amount

Qty	Particulars	Rate	Amount
40	Kali PM	10	400
20	Mud	10	200
2	Spice	365	730
40	Nat PM	25	1000
1	Lozzy	86	86
1	Chili	300	300
			300

Signature and Stamp

ACCEPTED

(59)

Dr. Muhammad Siddiq
M.B.B.S FCPS Neurosurgery

NEUROSURGERY CLINIC

نیوروسرجری کلینک

ڈاکٹر محمد صدیق

ایم بی بی ایس۔ ایف سی پی ایس نیوروسرجری

2 PM TO 8PM
SUNDAY HOLIDAY

ایسوسی ایٹ پروفیسر شعبہ نیوروسرجری لیڈی ریڈنگ ہسپتال پشاور نماز، استغفار اور توبہ کا اہتمام کریں۔

تعطیل بروز اتوار

کمرہ نمبر C7-C6، خیبر میڈیکل سنٹر ڈگری گارڈن پشاور
2 بجے سے شام 8 بجے تک

Name:

سعید اللہ

Age:

Sex:

Date:

CLINICAL RECORD

Rx

Pain neck

Disc/osteophyte

Complete

C5-6

Power/normal

- Tab. Melor

ایک روٹی 15g

(38)

- Tab. Oxypric

ایک روٹی 15g

(30)

- Tab. Neuronid

ایک روٹی 15g

(50)

جمعہ کے دن دوپہر 2 بجے سے شام 6 بجے تک غریبوں کے لئے معائنہ مفت ہوگا۔

معائنہ کے لئے وقت اوقات کار کے دوران کلینک سے حاصل کریں، یا بذریعہ ٹیلی فون رابطہ کریں اور آنے سے پہلے پوچھ لیں۔

موبائل: 0335-5057140 - 0345-9398544

ATTESTED



نارتھ ویسٹ جنرل
ہسپتال اینڈ ریسرچ سنٹر

18

(60)

Prof: Tariq Khan (Hashim)

M.B.B.S, F.R.C.S.

Consultant Neurosurgeon

Northwest General Hospital & Research Centre

Sector A-3, Phase-V, Hayatabad, Peshawar.

Ph: 091-5838800, Fax: 091-5822620

Email: tariq.k@nwgh.pk, Web: www.nwgh.pk

Date: 25 APR 2017

264

neck pain @ our house practice
@ arm - @ hand - @ by use was -
wishes gurgled wealdest
%o gaiter oriented - painful neck. no
Darius diph.

TUB BROZA
h1

20 APR 2017
h1

2017

C56

needs attention

Amend

descending

Pyrosis re
inpatient

explains

more than 6hr

..... اور بعد معائنے کیلئے تشریف لائیں۔

زحمت سے بچنے کیلئے مریضوں سے درخواست ہے کہ وزٹ کیلئے پیشگی نمبر حاصل کریں۔

A project of ALLIANCE HEALTHCARE (Pvt) Ltd.

پیشگی بروز بخت اتوار

ATTENDED

701000
25000
801000
175000

دائره
افسوس
م
م
م

دائره

61



Northwest General
Hospital & Research Centre

DEPARTMENT OF RADIOLOGY
Sector A-3, Phase-V, Hayatabad, Peshawar.
Ph: 091-5838800, Fax: 091-5822620
Email: radiology@nwgh.pk, Web: www.nwgh.pk

Name: SAMI ULLAH	Reg No: 041706315	A project of ALLIANCE HEALTHCARE (Pvt) Ltd.
Age: 26-Year(s)	Performed: 25-Apr-2017	0417-19611
Gender: Male	Reported: 25-Apr-2017 05:47 PM	Ref By: Tariq Hashmi Khan

MRI CERVICAL SPINE

CLINICAL FEATURES: *Neck and right arm pain.*

TECHNIQUE:
Multiplanar and multiecho imaging done through cervical spine.

FINDINGS:

- There is partial fusion of C6 /C7 vertebrae.
- Diffuse disc bulge is seen at C3 /C4 level.
- There is diffuse disc bulge at C5 /C6 level with right nerve root compression.
- Normal bone marrow signal is noted. Vertebral body heights are maintained.
- There are no fractures or dislocations. Disc heights are maintained.
- No para vertebral mass seen. Prevertebral soft tissues appear normal.
- No evidence of any extra-dural/intradural mass.
- Spinal cord shows no abnormal signal.
- There is normal craniocervical junction. No cerebellar tonsillar herniation is seen.

IMPRESSION:

Please see the underlined comments.


Dr. Inayat Shah Roghani
 DMRD, FCPS, Consultant Radiologist.

ACCEPTED

62

ED

MRI



63

Associate Professor

Dr. Farooq Azam

MBBS, FCPS, (Neuro Surgery)

Associate Professor Neuro Surgery Deptt

PGMI Lady Reading Hospital

Peshawar.



PMDC-No. 7382-N

ایسوسی ایٹ پروفیسر
ڈاکٹر فاروق اعظم

ایم بی بی ایس، ایف سی پی ایس (نیوروسرجری)

ایسوسی ایٹ پروفیسر نیوروسرجری ڈیپارٹمنٹ

پی جی ایم آئی لیڈی ریڈنگ ہسپتال پشاور

Pt's Name

Samuel /

Date

24 July 2017

Clinical Record

Rx

R Cervical Redupally

C5/6 AM

my

ATTESTED

70 رابطہ نمبر
0344-4922966

چھٹی بروز اتوار

کلینک: B-9 خٹک میڈیکل سنٹر ڈبگزی گارڈن پشاور شہر



Department of Pathology

Plot #2, Sector B-2, Phase-5,
Hayatabad Peshawar.

64

پشاور انسٹیٹیوٹ آف میڈیکل سائنسز

پلاٹ نمبر 2، سیکٹر B-2، فیز 5، حیات آباد پشاور

Patient Name	SAMI ULLAH	Receipt No	17051104
Age	26 Years	Date	01-May-17 06:58 PM
Gender	Male	Consultant	Farooq Azam
Patient Type:	In-patient	Bed No	322

Viral Profile

HBs Ag	0.10	Non Reactive	Cut off index for Non Reactive < 1.0
HCV Antibody	0.08	Non Reactive	Cut off index for Non Reactive < 1.0
HIV Antibodies	0.14	Non Reactive	Cut off index for Non Reactive < 1.0

AI (ESTED) 

Prof. Dr. Liaqat Ali
MBBS, DCP, M. Phil (Microbiology)
Chairman Laboratory Services &
Consultant Microbiologist

Prof. Dr. M. Shiraz Khan
MBBS, M. Phil (Histopathology)
Consultant Histopathologist

Dr. Inamullah
MBBS, MCPS (Pathology)
M. Phil (Hematology)
Associate Professor &
Consultant Hematologist

Dr. Shabir Ahmed Orakzal
MBBS, M. Phil (Chemical Pathology)
MPH (KMU-IPHSS)
Assistant Professor &
Consultant Chemical Pathologist

Dr. M. Tariq Hamayun
MBBS, M. Phil (Hematology)
Director Laboratory Services
Assistant Professor &
Consultant Hematologist

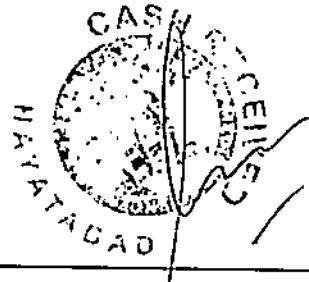
65

Patient Copy		Peshawar Institute of Medical Sciences, Hayatabad Peshawar		Created By: Farzan	
Patient	SAMI ULLAH	Consultant	Farooq Azam		
Receipt #	17051104	Registration #	1705189		
Receipt Date	01-May-2017 16:40	Patient Age	26 Years		
Patient Type	General Out-Patient	Origin	Pakistan, Peshawar		

Viral Profile	1	3350
---------------	---	------

Total Amount 3350 Reg. Fee 100 Discount 0 Net Amount 3450

Dress 800
4250 =



NOTE: Registration Fee is not Refundable.

ANNEXED

66



Peshawar Institute of Medical Sciences
Hayatabad Peshawar.

Date 1/5/17

Patient Name: Samiullah

Room No 322

Date of Admission _____

Surgeon Name Dr Farooq Azim

MEDICINE REQUIRED

1. 1ml Oxidil 1gm - (1) NOS
2. 1ml Dexamethasone - (4)
3. 1ml Zantac - (2)
4. 1ml R/L (1000mg) - (2)
5. D/E Symploc - (4)
6. cc sec - (1)
7. as p set - (2)
8. 1ml Voltal - (2)
9. _____
10. _____

Staff Nurse

Doctor On Duty

ATTESTED



Peshawar Institute of Medical Sciences

Plot# 2, Sector B-2, Phase 5, Hayatabad Peshawar.
Ph: 091-5892730-7 - Fax: 091-5822780

(67)

CASH RECEIPT

Security Charges

Room

R. No:

9521

Date: 21.01.17

1/5/2017

Received with thanks from Mr./Mrs. Sami Ullah

Admitted by, Dr. Farooq Azam

Amount in words Ten thousand only

Rs. 10,000/-

Seal & Sign
Peshawar Institute Of Medical Sciences

ATTESTED

68

O. T. NOTES

CONDITION ON DISCHARGE

Date: 7/5/17

Operation: CS-6 And cervical Discs

Surgeon: Dr Farooq Alam

Assistant: _____

Proceders: CS-6 And cervical

Discs

Wound (Closed)

Am ok

S. Adani

ATTENDED

69

یہ ہسپتال پاک انٹرنیشنل میڈیکل کالج کا نیٹ ورک ہسپتال ہے۔

اس ہسپتال کے وڈو میں سرکاری ہسپتالوں کے طرز پر مریضوں کا داخلہ اور علاج کیا جاتا ہے۔

جس میں خصوصاً کارڈیالوجی، نینوروجری، کینیسر، جنرل میڈیسن، آنکھ، پیڈیاٹرک، بچوں، آئی اور ای این ٹی

(E.N.T) کے مرینٹوں کا داخلہ ہوتا ہے۔

MRI Seimens 1.5 Tesla Essenza کی سہولت سرکاری ہسپتالوں سے

بہتر قیمت پر موجود ہیں۔

اس ہسپتال میں 8 اور 8 پریشن تھینر 9.9 لیسٹروں کا آئی سی 7 لیسٹروں سے CCU

Aquilion سی ٹی سکین ڈیجیٹل ایکسرے، کینیڈا ڈیڈلیبارڈی، نائرسٹی اور

نزیو تھریاپی کی سہولت بھی موجود ہے۔

ایئر کنڈیشننگ کے لئے ہینڈ اور آؤٹ اور گھی معائنہ کیا جاتا ہے۔

اوقات معائنہ نینوروجری

روزانہ صبح 9:00 بجے سے 5:00 بجے تک نینوروجری

پشاور انسٹیٹیوٹ آف میڈیکل سائنسز

PIMS



پشاور

Discharge Slip

Pt. Name Sami Ullah

Age 26/1 Sex M

Address T. M. S. S. S.

Ward Private Rooms 3rd Room No 302/4

D/A [Signature] D/D [Signature]

D/o Of [Signature]

Diagnosis C5-6 P111

Specialty

Operation Antinuclear

Peshawar Institute Of Medical Sciences
Plot-2 Sector B-2, Prof Dr. M. Daud Khan Road,
Phase-5, Hayatabad, Peshawar, Pakistan
Tel: +92-91-5892730-5 Fax: 5822780

ATTESTED

70

Annex "C"

O.R.D.E.R

This office order relates to the disposal of formal departmental enquiry against, Constable Sami Ullah NO. 1885 of FRP/HQrs: Peshawar who remained absent from duty w.e. from 09.01.2011 to 07.03.2011 his total absence period (57) days, without any leave/permission of the competent authority.)

In this connection formal departmental proceedings was initiated against him and I/C Mess/FRP HQrs: Peshawar was nominated as Enquiry Officer. He conducted enquiry into the matter and submitted his report.

Keeping in view the recommendation of the Enquiry Officer and other material available on record it has become crystal clear that the delinquent official is habitual absentee. Therefore, in exercise of Powers vested to me under the KPK, (N.W.F.P) Removal from Service (Spl: Powers) Ordinance 2000³ Constable Sami Ullah NO. 1885, of FRP/HQrs, is hereby removed from Service under the above mentioned rules w.e from³ the date of his absence i.e. 09.01.2011 with immediate effect.

Order announced.

268
20-3-12

[Signature]
DY: COMMANDANT
FRONTIER RESERVE POLICE
KPK PESHAWAR

No. 538-42 PA/FRP/HQrs: dated Peshawar, the 25/02/2012

Copy of the above is forwarded to:-

1. The Commandant FRP/K.P.K. Peshawar
2. The Accountant /FRP/HQrs: Peshawar.
3. The SRC/FRP/HQrs: Peshawar
4. The OSI FRP/HQrs: Peshawar
5. The FMC/ FRP/HQrs: Peshawar with original Enquiry file.
6. The SPP FRP Kohat Peshawar for later enquiry and submission for

[Stamp]
O.B. No. 139
25-2-2012

OASi /SRC/PO

This office
OB 159
24-3-2012

[Signature]

[Signature]

ATTESTED

ORDER

This order will dispose of the departmental appeal preferred by ex-constable Sami Ullah No. 1885 of FRP Kohat Range, against the order of Deputy Commandant FRP KP, Peshawar, wherein he was awarded major punishment of removed from service on 25.02.2012. The applicant was proceeded against on the allegations that he was remained absent from lawful duty with effect from 09.01.2011 to 07.03.2011 for period of 57 days, without any leave or prior permission from the competent authority.

In this regard, proper departmental enquiry was initiated against him, as he was issued Charge Sheet alongwith Summary of Allegations and Incharge Mess FRP HQrs; Peshawar was nominated as Enquiry Officer with the direction to make probe into the matter. After completion of enquiry, the Enquiry Officer submitted his findings, wherein the delinquent constable was found guilty of the charges leveled against him and recommended for suitable punishment.

In the light of recommendation of Enquiry Officer and other relevant record, therefore he was awarded major punishment of removal from service vide order Endst; No. 538-48/PA, dated 25.02.2012.

Feeling aggrieved against the impugned order of Deputy Commandant FRP KP, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 16.10.2019.

During the course of personal hearing, the applicant failed to present any justification regarding to his innocence. From perusal of record the instant appeal has found badly barred in time. The law helps the diligent and not indolent. The one, who wish to enforce his claim, must do it at the earliest a lacks deprive the litigant from enforcing his right.

Based on the findings narrated above, I, Sajid Ali PSP Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being badly time barred and meritless.

Order Announced.

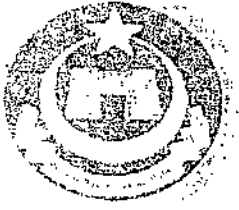
AT (SIGNED)

Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar

No 9742-43/EC, dated Peshawar the 17/10/2019.

Copy of above is forwarded for information and necessary action to the:-

1. SP FRP Kohat Range, Kohat. His service record alongwith D-file sent herewith.
2. Ex-constable Sami Ullah No. 1885 S/O Murtaza Khan, Police Station Ragi, Village Aftazai, District Peshawar.



(73)

Amlex "E"

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 3908 /19, dated Peshawar the 07/11/2019.

To : The Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

Subject: - REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Sami Ullah No. 1885 of FRP Kohat Range against the punishment of removal from service awarded by Deputy Commandant FRP, KP Peshawar vide order Endst: No. 538-48/PA, dated 25.02.2012, being badly time barred.

The applicant may please be informed accordingly.

(SYED ANIS-UL-UASSAN)

Registrar,




For Inspector General of Police,

Khyber Pakhtunkhwa

Peshawar.

05-11-2019

ATTESTED

قیمت 50 روپے	27122	  
ایڈوکیٹ: <u>Mirza Haid</u>		
بار کونسل/ایسوسی ایشن نمبر: <u>BC-12-3483</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ
رابطہ نمبر: <u>0300-5917744</u>		

بجاءت جناب: سر سید سید سید کمال

مخانب: <u>مسلم</u>	دعویٰ:
	علت نمبر:
	موضوع:
	جرم:
	تھانہ:

باعث تحریر آنکہ

بسم اللہ بنام سید سید سید کمال

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کاروائی متعلقہ

آن مقام سید سید کمال کیلئے محمد ابراہیم کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 28-11-2019

Accepted
with interest

العبد گواہ شد العبد

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

0300-5917744

محمد ابراہیم

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1730/2019.

**Sami Ullah belt No. 1885 S/o Murtaza Khan R/o Mohallah Kandari Regi Aftize P.O
Khas, Tehsil & District Peshawar.....Appellant.**

VERSUS

**Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar &
others.....Respondents.**

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
1.	Para-wise Comments		03
2.	Affidavit		01
3.	Index		01
Total			05

RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1730/2019.

Sami Ullah belt No. 1885 S/o Murtaza Khan R/o Mohallah Kandari Regi Aftize P.O Khas, Tehsil & District Peshawar.....Appellant.

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar & others..... Respondents.

PARAWISE REPLY BY RESPONDENTS 1 to 3.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant is trying to conceal the material facts from this Honorable Tribunal.

FACTS:-

1. Pertains to the appellant record, as the appellant was employee of respondent department.
2. Incorrect. The appellant found a habitual absentee and did not take interest in his official duty.
3. Incorrect. The appellant was deliberately failed to make his arrival report at his new place of posting and remained absent from lawful duty with effect from 09.01.2011 to 07.03.2011 for period of 57 days, without any leave or prior permission from the competent authority. The plea taken by the appellant in the Para regarding to his illness is a propounded story as the medical certificates annexed by the appellant with the instant appeal are found after the removal of the appellant. Moreover, the appellant also failed to inform his seniors regarding the alleged accident
4. Incorrect. The appellant neither submitted leave application nor he was granted any leave as per available record, even he failed to inform his seniors regarding his injuries.
5. Incorrect. The appellant was not permitted any leave by the authority concerned, while he remained absent from lawful duty with effect from 09.01.2011 to 07.03.2011 without any leave or prior permission of the competent authority and at that time he was summoned time and again with the directions to report arrival and join the duty, but he did not turn-up.

6. Incorrect. On the allegations of willful absence, the appellant was dealt with proper enquiry and after fulfillment of all codal formalities he was awarded major punishment of removal from service accordingly. Moreover, the appellant was less interest in the service of Police Department therefore, he failed to submit any application for obtaining of the copy of removal order.
7. Incorrect Departmental appeal submitted by the appellant was thoroughly examined and rejected being barred by law and limitation as the order of his removal from service was passed in the year 2012 and after lapse of more than 07 years he was preferred departmental appeal.
8. The revision petition submitted by the appellant was also thoroughly examined and rejected on the ground of badly time barred.
9. Incorrect the appellant has no cause of action to file the instant appeal and which is not considerable in this belated stage in the eye of law.

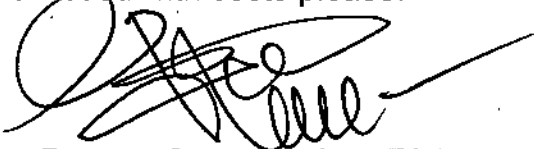
GROUND:-


- A. Incorrect. The orders so far passed by the respondents in the case of appellant are legally justified and in accordance with law / rules as the same were passed after fulfillment of all codal formalities required as per law / rules.
- B. Incorrect. On the allegations of willful absence the appellant was proceeded under applicable law i.e (removal from service) Special Power Ordinance 2000 accordingly. The appellant was issued Charge Sheet with summary of allegations and Enquiry Officer was nominated to conduct proper enquiry into the matter. Thus the removal order and subsequent rejection orders of the appellant are legally justified and in accordance with law rules. Moreover, the appellant did not approach for procuring of the copy of removal order.
- C. Incorrect. The appellant deliberately remained absent from his lawful duty without any leave or prior permission of the competent authority. The plea taken by the appellant regarding his illness is after thought story and he supposed to have taken this plea before the enquiry officer or before the competent authority during the course of enquiry. After completion of enquiry the Enquiry Officer submitted his findings report, wherein the allegations were fully established against the appellant and after fulfillment of all codal formalities the appellant was awarded major punishment of removal from service as per law/rules.
- D. Incorrect. The appellant absolutely treated in accordance with law/rules by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with existing law/rules. Moreover, for participation with enquiry proceedings the appellant was summoned time and again with the directions to appear before the Enquiry Officer, but he intentionally failed to avail this opportunity by meaning thereby that he was no more interested in the service of Police Department.


- E. Incorrect. As the appellant was proceeded against the (Special Power Ordinance 2002) and according to this rules the service of Show Cause Notice is not mandatory. Thus the orders passed by the respondents in the case of appellant are legally justified and in accordance to law/rules.
- F. Incorrect. The allegations are false and baseless. For disposal of departmental appeal the appellant was summoned and heard in person by the appellate authority in orderly room held on 16.10.2019, but he failed to present any justification regarding his innocence as well as delay in departmental appeal. Thus departmental appeal as well as revision petition of the appellant was thoroughly examined and found badly time barred and meritless as well, thus rejected as per law/rules.
- G. Incorrect. The appellant was enlisted in Police Department on 04.12.2009 and during his short length of service he was found insufficient and malingering type officer in account of official duty and was found not suitable for the service of Police Department as per Police Rules 12-21. However, the punishment awarded to the appellant is commensurate with the gravity of his guilt.
- H. Incorrect. It is a matter of facts that the appellant did not approach for obtaining of record. However, the respondents were not denied from the provision of such record.
- I. Incorrect. The allegations are false and baseless. As the appellant was treated in accordance to law /rules within the meaning of Article 4 of the constitution by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with the applicable law/rules. Thus the respondents have not violated any Article of the Constitution of Islamic Republic of Pakistan in the case of appellant.
- J. The respondents may also be permitted to raise additional grounds at the time of arguments.

PRAYERS:-

Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal being not maintainable may kindly be dismissed with costs please.


Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 03)


Commandant FRP
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)


Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1730/2019.

Sami Ullah belt No. 1885 S/o Murtaza Khan R/o Mohallah Kandari Regi Aftize P.O Khas, Tehsil & District Peshawar.....Appellant.

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar & others.....Respondents.

AFFIDAVIT

I, Ghasan Ullah ASI FRP HQrs; do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments on behalf of Respondents No. 1 to 3 is correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.

GA
Deponent
Ghasan Ullah
17101-9891560-3

ATTESTED



AS
15-4-2022