

24.02.2023

Nemo for appellant.


Muhammad Jan, learned District Attorney for respondents present.

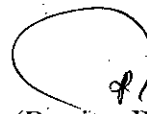
Preceding date was adjourned on a Reader's Note, therefore,

**SCANNED  
KPST  
Peshawar**

notice of the instant service appeal be issued to appellant and his counsel for 02.05.2023 for arguments before D.B.

On 19/04/2023, the  
counsel was informed  
telephonically for the date  
fixed (02/05/2023)  
Prof  
Moharrir

  
(Muhammad Akbar Khan)  
Member (E)

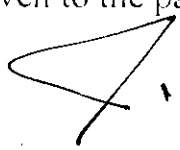
  
(Rozina Rehman)  
Member (J)

02<sup>nd</sup> May, 2023

**SCANNED  
KPST  
Peshawar**

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

2. Learned counsel for the appellant seeks adjournment for preparation of arguments. Adjourned. To come up for arguments on 04.07.2023 before the D.B. Parcha Peshi is given to the parties.

  
(Salah-ud-Din)  
Member (J)

  
(Kalim Arshad Khan)  
Chairman


\*Nacem Amin\*


4<sup>th</sup> July, 2023

**SCANNED  
KPST  
Peshawar**

1. Appellant in person present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

2. Lawyers are on strike. Therefore, case is adjourned to 01.11.2023 for arguments before D.B. P.P given to the parties.

  
(Rashida Bano)  
Member (J)

  
(Kalim Arshad Khan)  
Chairman

\*Mutazem Shah\*

01.09.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents have already been submitted. Learned counsel for the appellant requested for adjournment to further prepare the brief. Adjourned. To come up for preliminary hearing on 19.09.2022 before S.B.

(Mian Muhammad)  
Member (E)

19.09.2022

Mr. Mir Zaman Safi, Advocate for the appellant present. Preliminary arguments heard.

Reply/comments on behalf of respondents have already been submitted. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Case to come up for arguments before the D.B on 30.11.2022.

(Mian Muhammad)  
Member (E)

Rs 100  
Appellant Deposited  
Security & Process Fee  
- 22/9/22

30/11/22

24/2/23

deleted from list to come up on

13<sup>th</sup> June, 2022

Clerk to counsel for the appellant present.

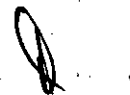
Counsel are on strike. To come up for preliminary hearing on 30.06.2022 before S.B.



(Kalim Arshad Khan)  
Chairman

30.06.2022

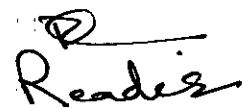
Clerk of learned counsel for the appellant present. Mr. Sultan Shah, Superintendent for respondent present and submitted written reply/comments on behalf of respondents which is placed on file. A copy of the same is handed over to the clerk of learned counsel of the appellant. To up for preliminary hearing on 18.08.2022 before S.B.



(Fareeha Paul)  
Member (E)

8.8.2022

Due to The Public Holiday The  
Case is Adjourned to 1-9-2022



Reader







Form- A

FORM OF ORDER SHEET

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

Case No.- 385 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/03/2022	<p>The appeal of Mr. Fazal Qadir presented today by Mr. Mir Zaman Safi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>11.04.2022</u></p> <p> CHAIRMAN</p>
	11.04.2022	<p>Learned counsel for the appellant present and heard. To come up for consideration tomorrow on 12.04.2022 before this S.B.</p> <p></p>
	12.04.2022	<p>Counsel for the appellant present. Chairman</p> <p>Let a pre-admission notice be issued to the respondents for the date fixed. To come up for reply/ preliminary hearing on 13.06.2022 before S.B.</p> <p> Chairman</p>

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

APPEAL NO. 385 /2022

FAISAL QADIR                      VS                      ADMINISTRATION DEPTT:

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5	Medical prescriptions	B	7- 13.
6	Application	C	14.
7	Impugned order	D	15.
8	Departmental appeal	E	16.
9	Appellate order	F	17.
10	Wakalat nama	.....	18.

APPELLANT

THROUGH:

  
MIR ZAMAN SAFI  
ADVOCATE

Office: Room No. 6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, Hashtnagri,  
Peshawar.

Cell: 0333-9991564

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

SERVICE APPEAL NO. 385 /2022

Mr. Faisal Qadir, Ex-Driver (BPS-06),  
Administration Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.  
.....APPELLANT

VERSUS

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary, Administration Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.

.....RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 22.03.2018 WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE HAS BEEN IMPOSED ON THE APPELLANT AND AGAINST THE IMPUGNED APPELLATE ORDER DATED 22.08.2019 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS**

**PRAYER:**

That on acceptance of this service appeal the impugned orders dated 22.03.2018 and 22.08.2019 may very kindly be set aside and the appellant be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be granted in favor of the appellant.

**R/SHEWETH:**  
**ON FACTS:**

- 1- That the appellant was serving in the respondent department as Driver (BPS-06) and right from the date of appointment the appellant was performing his duty quite efficiently and up to the entire satisfaction of his superior. Copy of the appointment order is attached as annexure.....A.
- 2- That during service a message was received to the appellant about serious illness of his wife, so the appellant left his duty and reached to his home by putting his wife to the Ayub Teaching Hospital, Abbottabad for examining of her illness. That after detail checkup the doctor concerned opined that wife of the appellant has been affected by diabetes, high blood pressure and kidney problem. Copies of the medical prescriptions are attached as annexure.....B.
- 3- That due to severe illness wife of the appellant was admitted in the said hospital and during such period of illness there was no any other male or female member available in family of the appellant to look after of his ailing

wife. That it is pertinent to mention here that due to the above mentioned reason the appellant could not approach his department to inform his high ups regarding the facts.

- 4- That later on the appellant due to the aforementioned illness of his wife and her look after preferred an application for his transfer to district Abbottabad but no reply was received to the appellant on the said application. Copy of the application is attached as annexure.....C.
- 5- That wife of the appellant after a little bit recovery from the above said illness, the appellant approached his department for re-joining of his duty but the authorities were not willing to do so. That later on the appellant was informed that he has been removed from service vide impugned order dated 22.03.2018. Copy of the impugned order is attached as annexure.....D.
- 6- That appellant feeling aggrieved from the impugned order dated 22.03.2018 preferred Departmental appeal before the respondent No.1 but the same was rejected on no good grounds. Copies of the Departmental appeal & appellate order are attached as annexure.....E & F.
- 7- That appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned orders dated 22.03.2018 & 22.08.2019 are against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.
- C- That no absence notice has been served on the appellant before issuing the impugned order dated 22.03.2018.
- D- That no publication has whatsoever been made by the respondent Department before issuing the impugned order dated 22.03.2018 which is necessary as per Rule-9 of the Civil Servant (Efficiency & Discipline) Rules, 2011.
- E- That absence of appellant was not willful but due to the cause of illness, therefore, the impugned orders dated 22.03.2018 and 22.08.2019 are not tenable in the eyes of law and liable to be set aside.
- F- That the absence of the appellant was neither deliberate nor intentional but because of serious illness of his wife due which he could not remain on duty, therefore, the impugned order dated 22.03.2018 is not tenable and liable to be set aside.


G- That no chance of personal hearing/defense has been provided to the appellant before issuing the impugned order dated 22.03.2018.

H- That the appellant seeks permission to advance any other ground and proofs at the time of hearing.

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

Dated: 14.03.2022.

APPELLANT  
  
FAISAL QADIR

THROUGH:   
MIR ZAMAN SAFI  
&

ABDULLAH KHAN KHATTAK  
ADVOCATES

**CERTIFICATE:**

It is certified that no other earlier appeal was filed between the parties.

  
DEPONENT

**LIST OF BOOKS:**

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED



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

APPEAL NO. \_\_\_\_\_/2022

FAISAL QADIR

VS

ADMINISTRATION DEPTT:

**AFFIDAVIT**

I Mir Zaman Safi, Advocate, High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



MIR ZAMAN SAFI,  
Advocate  
High Court, Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

APPEAL NO. \_\_\_\_\_/2022

FAISAL QADIR                      VS                      ADMINISTRATION DEPTT:

**APPLICATION FOR CONDONATION OF  
DELAY IN FILING THE ABOVE NOTED  
APPEAL**


**R.SHEWETH:**

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

**GROUND OF APPLICATION:**

- A- That valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.
- B- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather on technicalities including the limitation. The same is reported in 2002 PLC C.S 1388, 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is, therefore, prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

APPELLANT  
THROUGH:   
MIR ZAMAN SAFI  
ADVOCATE

(17)

A-6

**GOVERNMENT OF N.W.F.P**  
**ADMINISTRATION DEPARTMENT**

Dated Peshawar the 30.07.2008

**ORDER**

**NO.E&A(A.D)4(4)/2008.** Under rule 10 sub rule-2 of the N-WFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 read with amendment made vide notification No.SOR.VI(E&AD)1-13/2005 dated 10.08.2005, Mr. Faisal Qadar S/O Abdul Qadar, resident of Naju Mandi, P.O, Sum Elahi Mang, Teh: & Distt:, Mansehra is hereby appointed as Driver (BS-04) (3240-140-7440) against an employees sons quota an existing vacancy in FATA Secretariat, NWFP with immediate effect on the following terms and conditions:-

- i. He will get pay at the minimum of BS-04 including usual allowances as admissible under the rules. He will be entitled to annual increment as per existing policy.
- ii. He shall be governed by the N-WFP Civil Servants Act 1973 and all the laws applicable to the Civil Servants and Rules made there-under.
- iii. He shall, for all intents and purposes, be Civil Servant except for purpose of pension or gratuity. In lieu of pension and gratuity, he shall be entitled to receive such amount as would be contributed by him towards Contributory Provident Fund (C.P.F) alongwith the contributions made by Government to his account in the said fund, in the prescribed manner.
- iv. In case, he wishes to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited
- v. He shall produce a Medical Certificate of fitness from Medical Superintendent, Services Hospital, Peshawar, before joining duties in the Civil Secretariat, as required under the rules.
- vi. He has to join duties at his own expenses.

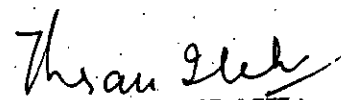
2. If he accepts the post on these conditions, he should report for duties to the undersigned within 14 days of the receipt of this order.

**SECRETARY TO GOVT: OF NWFP**  
**ADMINISTRATION DEPARTMENT.**

**ENDST: NO. & DATE EVEN.**

Copy forwarded to:-

1. Accountant General, NWFP, Peshawar.
2. Section Officer (Estab), FATA Secretariat w/r to his letter No.FS/E/100-1(Adi)Vol-3/3135-36 dated 03.04.2008
3. P.S to Secretary, Administration Department.
4. Section Officer (Transport), Admn: Department.
5. Mr. Faisal Qadar S/O Abdul Qadar, resident of Naju Mandi, P.O, Sum Elahi Mang, Teh: & Distt:, Mansehra.
6. Personal file.
7. Office Order file.

  
(EHSAN ELAHI)  
SECTION OFFICER (ADMN)

دوبارہ عیاشیہ سے روز سوموار OPD فرموت

**Treatment At Home**

inj. ampicillin 500 units 1+1+1  
تین روزانہ ہر 4 گھنٹے پر

Tab. Calveon D ایک گونہ دو روزانہ جاری

Tab. Arromax ایک گونہ دو روزانہ جاری

**Advice on Discharge**

گھر کیلئے ہدایات

پیشاب کی چھریوں سے پتہ لگائیں کہ آپ کی چھریوں میں کچھ نہیں ہے، چھریوں کی صفائی کریں۔  
باقاعدگی سے اپنا سٹوکر چیک کرنا جاری رکھیں۔  
طبیعت خراب ہونے کی صورت میں فرموت  
ڈاکٹر سے رجوع کریں۔  
اسی خوراک میں گوشت و دودھ شامل نہ کریں۔  
گھبراہٹ سے پرہیز کریں۔  
درد سے نمٹنے کے لیے 500mg آسپرین لیں۔  
باقاعدگی سے چھریاں

Signature

Cefamax 400mg - AVellon 400mg - D.Care

**AYUB TEACHING HOSPITAL**

ABBOTTABAD  
GYNAE UNIT "A"

**DISCHARGE CARD**

HEAD OF DEPARTMENT  
Prof Dr. Aziz un-Nisa Abbasi  
FRCOG, MRCOG (London)  
FCPS DGO, MCPS (Pakistan)

Associate Professor  
Dr. Aneesa Fawad  
M.B.B.S, F.C.P.S

Associate Professor  
Dr. Aneesa Islam  
M.B.B.S, F.C.P.S, M.C.P.S

Associate Professor  
Dr. Sadia Bibi  
M.B.B.S, M.C.P.S

Name Fatima

Husband's Name Fazal

Date of Admission 9/11/18 Date of Operation     

Date of Discharge 14/11/2018

Serial Number      U.No 5911/18A

Hospital Admission Number 1554427

Diagnosis G6D, Abs Al, 37 42 weeks

OPERATION slightly premature + chronic Diabetes

and Dr. Bishop

Treatment At Home		
Investigation	Pre-Op	Post Op
Blood Group & RH	A Rh +ve	
HB%	9.5g/dl	
Platelets	330 x 10 <sup>3</sup> /dl	
Blood Urea	14mg/dl	
Blood Sugar	230mg/dl	
Urine R/E	150mg/dl	
Ultrasound		
HBS	Negative	
HCV	Negative	
<b>Pre-Operative Treatment:</b> 1mg Diclofenac 12mg 1/4 stat. (2 Nos. 3 yrs) 1mg insulin 30 units 5c TDS		

*Managed Conservatively*

**OPERATION / DELIVERY NOTES**

Surgeon: \_\_\_\_\_

Anaesthetist: \_\_\_\_\_

Indication: \_\_\_\_\_

Incision: \_\_\_\_\_

Findings: \_\_\_\_\_

Procedure: \_\_\_\_\_

*Antenatal*

Histopathology Report: \_\_\_\_\_

Baby Notes: \_\_\_\_\_

# AHMED CLINICAL LABORATORY



03013003139

ID No: D1	Date 23/07/2018
Name: Fatima	Sex: Female
Ref By: Dr Qazi Ijaz Ahmed	Age: ***

## BIOCHEMISTRY

TEST	RESULT
Blood Sugar (Fasting)	mg/dl
Normal Value:	70 - 110 mg/dl
Blood Sugar (Random)	205 mg/dl
Normal Value:	80 - 160 mg/dl

Dr. Qazi Ijaz Ahmed

M.B.B.S Peshawar,  
DMJ Lahore

(Not Valid for Court)

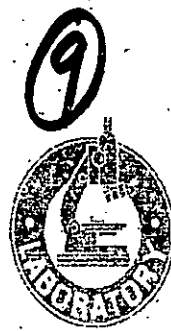
Signature:

IQBAL AHMED ALVI  
Microbiologist(M.Phil)

Near Raja Hotel, Pano Road, Lari Adda Manshra

ATTESTED

M. Ijaz



# AHMED CLINICAL LABORATORY

☎ 03365065568

ID No	107	Date	17/04/2018
Name	Fatima bibi	Age/Sex	Female
Ref By	Self	Spec	

## BIOCHEMISTRY

TEST	RESULT
------	--------

Blood Sugar (Fasting)

\*\*\* mg/dl

Normal Value:

70 - 110 mg/dl

Blood Sugar (Random)

276 mg/dl

Normal Value:

80 - 160 mg/dl

Signature:

Dr. Qazi Ijaz Ahmed

M.B.B.S Peshawar,  
DAJ Lahore

(Not Valid for Court)

IQBAL AHMED ALVI  
Microbiologist(M.Phil)

Near Raja Hotel, Pano Road Lari Adda Mansehra

ATTESTED



KING ABDULLAH TEACHING HOSPITAL  
MANSEHRA

10

FILTER OUT PATIENT DEPARTMENT

10

Patient Name: FATIMA BIBI

Patient ID:

Patient Sex:

Patient Yearly No: 156759

Patient Age

Patient Date & Time: 24 Oct 18 09:37 AM

Address

OPD:

Amount Rs. 10

Computer Operator: JAWAD

1st visit

prev NVD

COPD

Hx of diabetes

UGB → 2 1/2 yrs

in this pregnancy on  
oral Rx

LMP - 11-3-2018

END - 18-12-2018

DOP - 32wks

Pk

- G/A - 8 months

B P 110/70

- ANC

Ads

- Blood CP

- Urine R/E

- BSR

- Blood group

- HbSA

- Ant HCV

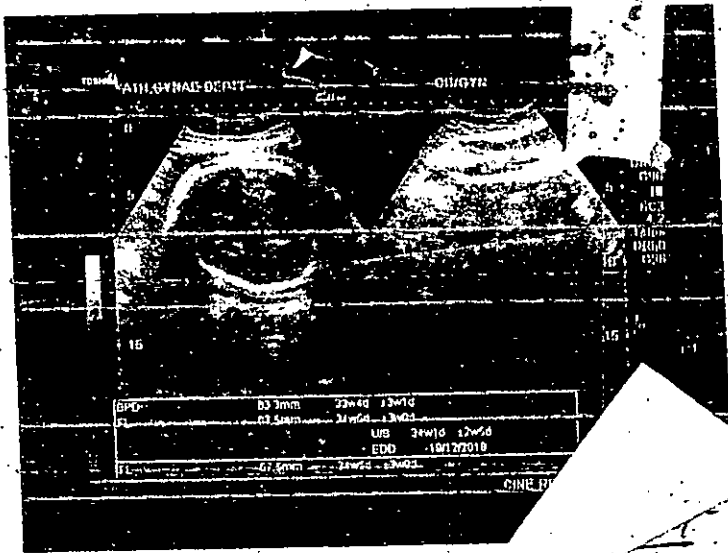
- obs USG

M. Kamran

[Signature]



**CHAIKES FAMILY  
HOSPITAL  
MATERNITY HOME**



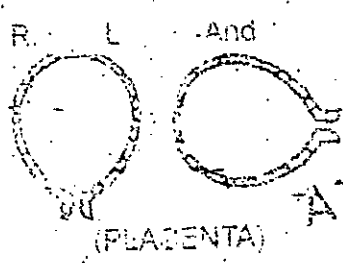
1

Name: Fatma Zeki

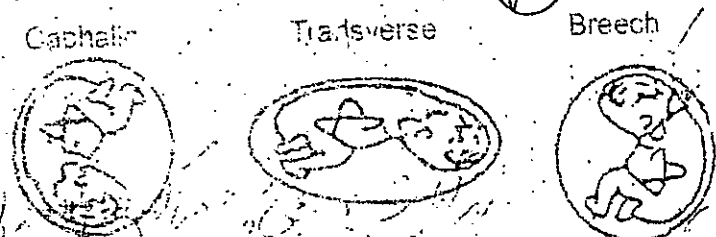
- \* Ultrasound Findings *CL A*
- \* No of Foci *DW b One II*
- \* Lie *Longitudinal/Transvers...*
- \* Presentation *Cephalic / Breech*
- \* Fetal Heart Beat *Present / Absent*
- \* Fetal Movements *Present / Absent*
- \* Crown Rump Length .....cm
- \* Biparietal Diameter .....cm
- \* Femur Length .....cm
- \* Gestational Age On Measurement .....wke
- \* E.d.d .....cm
- \* FUNDAL-ANTERIOR/POSTERIOR
- \* RIGHT/LEFT UTERINE WALL
- \* UPPER SEGMENT/LOWER SEGMENT
- \* PLACENTAL LING
- \* ..... COVERING INT OS/
- \* ..... NOT COVERING INT OS/

*6/15 AP 4 10 BD*  
*all nbs LBB*  
*in labour 24 hrs*

*Q baby delivered via NVD for home - as glucose 1-1 cap relocated 1-1-15 PLAGY 1-1-15 PONSIS 1-1-15*



**ATTESTED**



NOT VALID FOR COURT



12

VIEW: 08-Nov-2018 12:08:39

Haematology Report

Page 1 of 1

MRNO : K04-00001552214  
Name : FATIMA BIBI  
Age/Sex : 30 Year(s)/Female  
Address : ABBOTTABAD - PAKISTAN

Ordered By  
In-house Consultant : Anisa Fawad  
Report Destination : Main Reception  
Requested : 08-NOV-2018 10:12:23  
Specimen Received : 08-NOV-2018 10:20:05  
Reported : 08-NOV-2018 11:54:33

Hematology - Misc

TEST(s)	NORMAL RANGE(s)	UNIT(s)	K04HEM181861 29 08-NOV-18 11:54:33
ESR	0 - 20	mm/1st hr	80

ATTESTED  
*M. Arshad*

Note : Lab values should always be correlated with clinical picture. Normal Range(s) and Unit(s) shown are for most recent results.

MOHAMMAD ARSHAD  
Sr. Medical Technologist

Electronically verified report, no signature(s) required.

ADY  
**DR. NAVEED BAHADUR**  
 M.B.B.S., R.M.P



**SONOLOGIST**

Residence: Bajna Road,  
 Chinkiani  
 Ph: (0997) 530332

Patient's Name: \_\_\_\_\_ Age: \_\_\_\_\_ Sex: \_\_\_\_\_

Clinical Notes

M.F  
 G \_\_\_ P AB AL

Amenorrhoea  
 No  
 Gas no Pain  
 Kidney Pain  
 L.Ba Pain

B.P \_\_\_\_\_ /mmhg  
 Oedema  
 Temp

UMP Unsure  
 EOL

Investigations  
 Blood Group  
 HB  
 HBSAG  
 Anti HCV  
 3SR Urea  
 Jintan RE

**OBS U/S**

**No of Fetuses:** One. Two. Three  
**Lie:** Longitudinal / Transverse / Oblique  
**Presentation:** Cephalic/Breech/Shoulder  
**Liquor:** Adequate / Scanty / Excess  
**Placenta:** Not Pravia / Low Lying  
**Cardiac Activity (CA)**  
**Fetal Movement:**

**Any Anomaly**  
 BPD / CRL \_\_\_\_\_ cms  
 POG \_\_\_\_\_ Weeks  
 Edd \_\_\_\_\_ (+1)  
 (+1 Week)

**Abd & Pelvic U/S**

Allabd & Pelvic Organs Including  
 IVC, Aorta Liver, G. Bladder  
 Spleen, Kidneys, Uterus,  
 Ovaries have been scanned  
 All show normal echo Patterns  
 & no Pathology & no free fluid  
 in pelvic cavity except

*Handwritten notes and signatures:*  
 G. M...  
 Can...  
 4...  
 20...  
 2...  
 Sample...  
 20...  
 Sup...  
 20...  
 at [Signature]



Tab Genfolate      Tab Santribe      Syp E.Max

*Handwritten notes:*  
 شہزادہ  
 52+  
 52+  
 52+

اوقات کینٹ: صبح 9 بجے سے شام 4 بجے

Tab Santribe      ناغہ پروزاتوار

بہت صاحب سیکرٹری صاحب ایڈمنسٹریٹیشن ڈیپارٹمنٹ و فیڈریشن خواہ اس کے سیکرٹری

(14) - ج

درخواست برائے ٹرانسفر

صاحب عالیہ صاحبہ

کہہ سکتے ہیں آپ صاحبان نے زمرہ سائبہ بطور ڈرائیور ٹرانسفر سے فراہم کر دیا ہے اور  
2008 سے مسلسل اپنی ڈیوٹی پوری اہلیانہ پوری اور دلی لگاؤ کے ساتھ سرکاری کاموں  
کے دوران کمالیہ میں کئی عہدے کی ذمہ داری ادا کرتے ہوئے اپنے فرائض کو  
کوششاً پوری طور پر انجام دیا ہے۔

صاحبہ عالیہ۔ دوران ڈیوٹی صوبہ زخمی و خطرناک بیماریوں کا علاج کرتی رہیں  
اپنی ڈیوٹی پوری طور پر کرانے کا دل سے لگاؤ تھا جس سے انہی سبھی کا علاج ہوتا رہا  
شروع کیا اور پھر صوبہ زخمی کو کئی بلڈنگ اور شہر اور زونوں کی بیماریوں کا علاج کرتی  
اور انتہائی تریشیاں سے دوچار ہو کر رہنے لگیں اور ان کا علاج نہ ہو سکا  
تعمیرات میں سب سے پہلے آپ صاحبان سے درخواست کرانے کہ سبھی ٹرانسفر ایسٹ آباد  
کا علاج کیا جائے تاکہ میں اپنی ڈیوٹی کے ساتھ ساتھ اپنی ذمہ داریوں کو بھی ادا کر سکیں  
صوبہ زخمی میں صوبہ علاوہ کوئی دوسرا اور ایسے ہی نہ ہو سکیں اور ان کا علاج نہ ہو  
کہ اس کا علاج حاصل کر سکیں۔ صاحبہ عالیہ صاحبہ جھوٹے جھوٹے جھے ہیں اور ان  
کا خیال نہ کرنا کہ ٹرانسفر ایسٹ آباد کرانے کے احکامات صادر کرنا کہ

22  
2018

علیہ صاحبہ

فصلیہ ڈرائیور

ایڈمنسٹریٹیشن ڈیپارٹمنٹ  
سول سیکرٹری

علیہ صاحبہ



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

Dated: 22-03-2018

D-15

ORDER

No.E&A(AD)2(264)/2008. WHEREAS, Mr. Faisal Qadar, Driver (BPS-06) was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges mentioned in the Charge Sheet and Statement of Allegations dated 08-01-2019.

2. AND WHEREAS, Mr. Taj Muhammad Section Officer (Cabinet) Administration Department was appointed as Enquiry Officer by the competent authority to conduct enquiry against the accused.

3. AND WHEREAS, the inquiry officer called the accused on 28-01-2019 and 07-02-2019 for personal hearing and to record written statements but he did not appear before the inquiry officer for inquiry proceedings. Therefore, the inquiry officer after having examined the charges and evidence on the record of the accused official, submitted report.

4. AND WHEREAS, a show cause notice was served on the accused official on 22-02-2019 and he was directed to show cause as to why penalty of removal from service should not be imposed on him. The accused was also directed to intimate whether he desires to be heard in person, but he neither resumed duty nor submitted reply within 15 days i.e. up to 08-03-2019.

5. NOW, THEREFORE, the Competent Authority after having considered the charges, evidence on record and exercising his powers under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, has been pleased to impose a major penalty of "Removal from Service" on Faisal Qadar, Driver (BPS-06) with immediate effect.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

ENST OF EVEN NO & DATE.

Copy forwarded to the: -

- 1) Accountant General, Khyber Pakhtunkhwa.
- 2) Section Officer (Transport) Administration Department
- 3) Bill Assistant, E&A Department.
- 4) Mr. Faisal Qadar, Ex-Driver S/O Abadul Qadar R/O Janu Mandi, PO Sum Elahi Mang, Tehsil & District, Mansehra.
- 5) Personal File

SECTION OFFICER (ADMN)

25/3/019

ATTESTED

M. J. Khan

BEFORE THE WORTHY CHIEF SECRETARY  
K. P. K. PESHAWAR

Subject: - APPEAL FOR REINSTATEMENT  
IN SERVICE WITH BACK  
BENEFITS.

E - 16

PRAYER: -

On acceptance of appeal the order of Secretary Government of Khyber Pakhtunkhwa Administration Department, Removal from Service may kindly be set aside and appellant may kindly be reinstated in service with back benefits.

**Respectfully Sheweth!**

- 1) That, appellant was appointed as a Driver in Administration Department Khyber Pakhtunkhwa in the year 2007 and served as such for considerable period and never afforded any chance of complaint to his higher officials.
- 2) That, appellant was serving in Peshawar a message received about the illness of his wife, so appellant left Peshawar and reached to his native village Sum Illahi Mang, Mansehra. After reaching came to know that my wife was serious ill so, I alongwith my wife went to Abbottabad Ayub Teaching Hospital where doctor examined my wife and opined that my wife is suffering from diabetic, high blood pressure and kidney problems.  
(Copies of medical certificates are here attached with)
- 3) That, the illness of my wife was so sewer, doctor admitted my wife in hospital during to serious illness no other male or female members were available at my home or village, the appellant was only member to look-after his ailing wife and due to this reason appellant could not intimate to his department, appellant's parents and my wife parents has been died, so, the

ATTESTED

*[Signature]*

*[Signature]*

appellant is only sole member to look after my wife and beside my children.

(16/A)

- 4) That, the appellant was served charge sheet alongwith summary of allegation and appellant gave detailed reply, appellant has never received any show cause notice or final show cause notice. In the absent of appellant the procedure of inquiry conducted by department has been blatantly violated by the Inquiry Officer.

(Copies of charge sheet alongwith summary of allegation and appellant detail reply to the charge sheet are herewith attached).

- 5) That, the inquiry office has not applied his independent mind rather has acted in according with his sweet will and choice which is not object of law.
- 6) That, the absence of appellant is not deliberate nor intentional but on account of serious illness of my wife and account of above noted reason appellant resumed his duty nor could informed that authority.
- 7) That, appellant is belongs to a poor family and his entire family members are depended upon him and appellant is only source of earning the livelihood.
- 8) That, on account of impugned order not only the appellant but his entire family members are passing hard time.

It is, therefore, most humbly prayed and requested that the order of Secretary removal from service may kindly be set aside and appellant may kindly be reinstated in service with back benefits.

Dated 28.06.2019

Faisal Qadar

Ex-Driver (BPS-6)

Govt. of K.P.K.

Administration Department  
Presently Village Sum Illahimang  
Tehsil and District Manshira



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

F-17

No. E&A(AD)Pfile/Faisal Qader, Driver  
Dated Peshawar the -08-2018

To,

Mr. Faisal Qader, ex-Driver  
S/O Abdul Qader,  
R/O Janu Mandi, PO Sum Elahi Mang,  
Tehsil & District Mansehara.

Subject:

DEPARTMENTAL APPEAL FOR RE-INSTATEMENT IN SERVICE.

I am directed to refer to your Departmental Appeal for re-instatement in service dated 28-06-2019, and to inform you that after examination of your case the Appellate Authority has regretted your appeal being time barred.

SECTION OFFICER (ADMN)

Endst of even No. & date.

Copy forwarded for information to:

1. Section Officer (Transport), Administration Department.
2. PS to Secretary Administration Department.

SECTION OFFICER (ADMN)

ATTESTED



**VAKALATNAMA**

**BEFORE THE** Khyber Pakhtunkhwa Service  
Tribunal, Peshawar

OF 2022

Faisal Qadir

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Administrative Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We Faisal Qadir

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_/\_\_\_/2022

Faisal Qadir  
CLIENT

Mir Zaman Safi  
ACCEPTED  
MIR ZAMAN SAFI

Said Rehman  
&  
SAID REHMAN  
ADVOCATES

OFFICE:  
Room No.6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, G.T Road,  
Hashtnagri, Peshawar.  
Mobile No.0323-9295295  
0317-9743003

Abdullah Khan  
Abdullah Khan  
Advocate

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

**SERVICE APPEAL NO. 385/2022**

Mr. Faisal Qadir.....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa through Chief Secretary & Others .....Respondents

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

SERVICE APPEAL NO: 385 / 2022

Mr. Faisal Qadir, Driver.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa through Chief Secretary, KP.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. 01 & 02

Respectfully Sheweth,

PRELIMINARY OBJECTIONS.

- 1) The appellant has got no cause of action and locus standi.
- 2) The appeal is not maintainable in the present form. As such this Honorable Tribunal has no jurisdiction to entertain the instant appeal.
- 3) The appeal is not based on facts.
- 4) The appellant has not come to the Tribunal with clean hands.
- 5) The appeal is bad for non-joinder and mis-joinder of necessary parties.
- 6) The appellant has concealed material facts from this Honorable Tribunal
- 7) That the appellant is estopped by his own conduct.

ON FACTS:

1. **Incorrect as laid.** Brief facts covering this case are that Mr. Faisal Qadir, Ex-Driver was absent from duty w.e.f 10-08-2018 on account of which show cause notice dated 12-12-2018 was served upon him on his home address in terms of Rule-9 E&AD Rules, 2011 (**Annex-I**). In response to that the ex-official submitted a reply which was found unsatisfactory by the Competent Authority (Secretary Administration). Therefore, the Competent Authority authorized an inquiry to be conducted in the charge sheet and statement of allegations. Section Officer (Budget & Development) of this Department was nominated as Inquiry Officer. He conducted the inquiry and submitted findings. As per the findings of the inquiry officer, all the charges leveled against him stood proved. Accordingly, a show cause notice with tentative penalty of "removal from service" was served upon him to which he neither replied nor reported for duty. Therefore, after seeking approval from the competent authority i.e. Secretary Administration Department, the penalty of removal from service against the ex-official was imposed vide this Department order dated 22-03-2019 (**Annex-II**).
2. **Incorrect.** The stance of the appellant is not based on facts as the track record of the official is also not up to the mark. The statement is false.
3. **Incorrect as laid.** The inquiry officer in his report has mentioned that the wife of the official was admitted in hospital from 09-11-2018 to 14-11-2018 (06 days) as per record of the hospital while he remained absent from 10-08-2018 to 26-12-2018 (**Annex-III**).
4. **Incorrect as laid.** The official being a civil secretariat employee cannot be posted in District Abbottabad as the same is not covered under the rules.

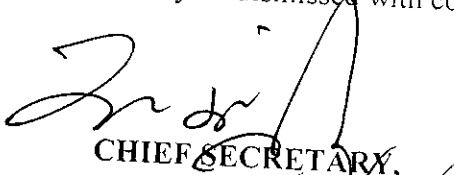
- 3
5. **Incorrect as laid.** In light of his poor performance in official duty, fact finding inquiry was conducted against him in which he was penalized with major penalty of removal from service w.e.f 22-03-2019 (**Annex-IV**).
6. **Incorrect as laid.** The departmental appeal submitted by the appellant was duly processed and regretted by the appellate authority on the ground of being time barred and being devoid of merit. The appellant was duly informed of outcome of his departmental appeal vide this Department letter No. E&AD/P.file/Faisal Qader/ Driver, dated 22-08-2019 (**Annex-V**).
7. **No comments.** \*


**ON GROUNDS:**

- A. **Incorrect as laid.** Both the orders dated 23-03-2019 and 22-08-2019 (duly annexed) are fully covered under the rules / existing policy of the provincial government. They are tenable and not liable to set aside.
- B. **Incorrect as laid.** The appellant has been treated in accordance with law and rules on the subject and no violation whatsoever of the Constitution of Pakistan has been committed.
- C. **Incorrect as laid.** -A show-cause notice was served on the accused official on 12-12-2018 through registered Dak directing him to submit reply within seven days failing which an ex-parte action shall be taken against him (**Annex-VI**).
- D. **Incorrect as laid.** The appellant after 4 months submitted an application to the Chief Secretary, Khyber Pakhtunkhwa and requested for his reinstatement into service with back benefits. His application was processed but the same was regretted / not approved being time bared/ devoid of merit.
- E. **Incorrect as laid:** The absence of the appellant was intentional and willful as false statements have been recorded by him before the inquiry officer. His request cannot be accepted.
- F. **Incorrect as laid:** The order of his removal from service is fully justified and covered under the rules / existing policy of the provincial government and cannot be set aside.
- G. **Incorrect as laid:** The appellant has been provided opportunity of personal hearing and self-defence and had asked to appear before inquiry officer as per law. His entire career is replete with number of explanations and show-cause notices. Thus it can be concluded that his career is not an unblemished one.
- H. **Incorrect as laid:** No comments.

**PRAYER**

It is, therefore, most humbly prayed that the instant petition, being devoid of merit, may very graciously be dismissed with costs.

  
CHIEF SECRETARY,  
Khyber Pakhtunkhwa  
(RESPONDENT NO. 01)

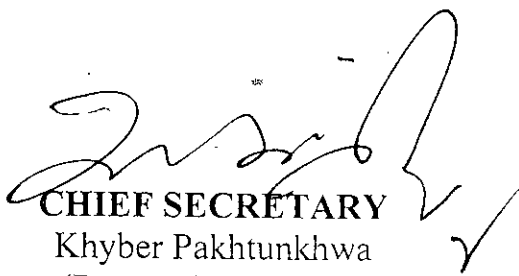
  
SECRETARY ADMINISTRATION  
Administration Department  
(RESPONDENT NO. 02)

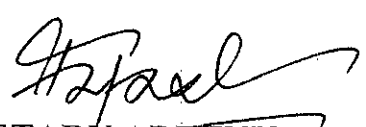
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**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ESTABLISHMENT & ADMINISTRATION DEPARTMENT**

**AUTHORITY LETTER**

Mr. Sultan Shah, Superintendent Litigation Section-I, Establishment Department, Government of Khyber Pakhtunkhwa is hereby authorized to submit Parawise Comments before the Khyber Pakhtunkhwa Service Tribunal, Peshawar in S.A No. 385/2022 titled Faisal Qadir Versus Govt. of Khyber Pakhtunkhwa, on behalf of Respondents.

  
**CHIEF SECRETARY**  
Khyber Pakhtunkhwa  
(Respondent No. 01)

  
**SECRETARY ADMINISTRATION**  
Administration Department  
(Respondent No. 02)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 385/2022

Faisal Qadair.....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa & Others.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

AFFIDAVIT

I Sultan Shah Superintendent (Litigation) Establishment Department do hereby solemnly declare that contents of the Parawise Comments are correct to the best of my knowledge and record and nothing has been concealed from this Honourable Tribunal.

**Deponent**

**(Sultan Shah)  
Superintendent (Lit)  
E & A Department  
CNIC.17301-1286739-5**

Annex I & VI

6



THROUGH REGISTERED DAK

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

No. E&A(AD)/02(264)2008

Dated Peshawar the 12-12-2018


To

Mr. Faisal Qader (Driver)  
S/O Abdul Qader  
R/O Janu Mandi, PO Sum Elahi Mang,  
Tehsil & District Mansehara.

SUBJECT: SHOW-CAUSE NOTICE.

You are absent from duties since 10-08-2018 with  
intimation or prior approval which amount to misconduct and makes you  
be proceeded against under the Khyber Pakhtunkhwa Government  
(Efficiency & Discipline) Rule, 2011.

2- You are, therefore, directed to report for duty and  
your position within fifteen (15) days failing which stern disciplinary action  
be initiated against you under the rules ibid.

  
(MUHAMMAD YOUSAF  
SECTION OFFICER (A)

Endst of even No & date

A copy is forwarded to Section Officer (Tra  
Administration Department

  
SECTION OFFICER (A)

Annex-II

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**TO BE SUBSTITUTED FOR ORDER OF EVEN NO. DATED 22-03-2018**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

**ORDER**

Dated: 22-03-2019

**No.E&A(AD)2(264)/2008.** WHEREAS, Mr. Faisal Qadar, Driver (BPS-06) was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges mentioned in the Charge Sheet and Statement of Allegations dated 08-01-2019.

2. **AND WHEREAS,** Mr. Taj Muhammad Section Officer (Cabinet) Administration Department was appointed as Enquiry Officer by the competent authority to conduct enquiry against the accused.

3. **AND WHEREAS,** the inquiry officer called the accused on 28-01-2019 and 07-02-2019 for personal hearing and to record written statements but he did not appear before the inquiry officer for inquiry proceedings. Therefore, the inquiry officer after having examined the charges and evidence on the record of the accused official, submitted report.

4. **AND WHEREAS,** a show cause notice was served on the accused official on 22-02-2019 and he was directed to show cause as to why penalty of removal from service should not be imposed on him. The accused was also directed to intimate whether he desires to be heard in person, but he neither resumed duty nor submitted reply within 15 days i.e. up-to 08-03-2019.

5. **NOW, THEREFORE,** the Competent Authority after having considered the charges, evidence on record and exercising his powers under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, has been pleased to **impose a major penalty of "Removal from Service" on Faisal Qadar, Driver (BPS-06) with immediate effect.**

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

ENST OF EVEN NO & DATE.

Copy forwarded to the: -

- 1) Accountant General, Khyber Pakhtunkhwa.
- 2) Section Officer (Transport) Administration Department
- 3) Bill Assistant, E&A Department.
- 4) Mr. Faisal Qadar, Ex-Driver S/O Abadul Qadar R/O Janu Mandi, PO Sum Elahi Mang, Tehsil & District, Mansehra.
- 5) Personal File

SECTION OFFICER (ADMN)

25/3/019





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

Dated: 22-03-2018

ORDER

No.E&A(AD)2(264)/2008 WHEREAS, Mr. Faisal Qadar, Driver (BPS-06) was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges mentioned in the Charge Sheet and Statement of Allegations dated 08-01-2019.

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SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

ENST OF EVEN NO & DATE.

Copy forwarded to the: -

- 1) Accountant General, Khyber Pakhtunkhwa.
- 2) Section Officer (Transport) Administration Department
- 3) Bill Assistant, E&A Department.
- 4) Mr. Faisal Qadar, Ex-Driver S/O Abadul Qadar R/O Janu Mandi, PO Sum Elahi Mang, Tehsil & District, Mansehra.
- 5) Personal File

SECTION OFFICER (ADMN)

25/3/019

Annex-TIA

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258  
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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT AND ADMN: DEPARTMENT

No. SOB/(AD)/15(41)/General/M-F/2019/Faisal  
Dated Peshawar the 15<sup>th</sup> February, 2019.

To

The Section Officer (Admn)  
Administration Department.

S.O. (Admn) Administration Deptt:  
Diary No. 683  
Date 15-2-19

SUBJECT: INQUIRY INTO THE CASE OF MR. FAISAL QADER, DRIVER.

Refer to your letter No. E&A(AD)02(264)2008 dated 08-01-2019 on the subject cited above and to enclose herewith inquiry report conducted against Mr. Faisal Qader, Driver, Administration Department for further necessary action.

Enclosed. P/ File (P. 1-266/C)  
Note sheets (paras 1-263/N)  
ENDST: OF EVEN NO. & DATE

(TAJ MUHAMMAD)  
SECTION OFFICER (CABINET)

Copy forwarded to the PS to Secretary Administration Department.

SECTION OFFICER (CABINET)

P-4 - P  
28  
18/2/19

## INQUIRY REPORT

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The undersigned was appointed as inquiry officer by the competent authority vide Administration Department letter dated 08-01-2019 (F/A) to conduct inquiry against Mr. Faisal Qader, Driver Administration Department.

### GROUND S:-

The competent authority has been pleased to serve charge Sheet / statement of allegations upon Mr. Faisal Qader, Driver Administration Department under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline ) Rules, 2011 on account of following irregularities (F/B & C):-

- i. That you absented yourself from duty w.e.f 10.08.2018 to 26.12.2018 (128 days) without any intimation/prior approval of the competent authority.
- ii. That following a report of Section Officer (Transport), a show-notice dated 12.12.2018 was served on you in terms of Rule-9 of E&D Rule, 2011, at your home address directing you to resume duty and explain your position within 15 days.
- iii. That you submitted a reply dated 26.12.2018 whereby you not only admitted your guilt but also sought pardon, but again you absented yourself from duty even until 31.12.2018.
- iv. That reply you submitted was found utterly unsatisfactory because you again absented yourself from duty; and that from perusal of documents/prescriptions it reveal that your wife remained in Hospital just for 07 days (for some gynecological procedure), whereas you absented yourself from duty for 128 days without any intimation/prior approval on the pretext of your wife's illness.
- v. That your conduct mentioned above is highly prejudicial to good order or service discipline.

### INQUIRY PROCEEDINGS:

To probe into the matter the accused was called twice on 28.01.2019 and 07.02.2019 through Section Officer (Transport) Administration Department for personal hearing to record his verbal /written statement concerning factual position regarding the allegations framed against him (F/D & E). However, Mr. Faisal Qader, Driver Administration Department could not appear before the inquiry officer on aforementioned dates for proceedings of the inquiry. Moreover, the matter was discussed with Section Officer (Transport) Administration Department telephonically on 12.02.2019 and asked him to

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direct the concerned officials of Transport Section to appear before the undersigned for recording their statements as well as the accused.

Accordingly Mr. Kifayat Khan, Superintendent, Transport Section and Mr. Kareem Khan, Driver (working as Supervisor of Pool Drivers) Transport Section were appeared before the undersigned for their statements on 12.02.2019. Mr. Kifayat Khan, Superintendent and Karim Khan, Driver (Supervisor Pool Drivers) Transport Section Administration Department were given their statements stating that the accused official Mr. Faisal Qader, Driver Administration Department is absent from duty w.e.f 10.08.2018 till date (12.02.2019) and they are not known regarding his where about **(F/F & G)** and also added that the accused is not willing worker.

Furthermore, perusal of the personal file of the accused official (Mr. Faisal Qader, Driver) revealed that his track record regarding official duty is unsatisfactory. He was reported absent from duty by several departments in his entire service. On the same offence, he was charge sheeted in 2015 and Mrs. Farzana Afzal, Section Officer (Aviation-I) Administration Department was appointed as inquiry officer and in light of her inquiry report he was penalized **(F/H)**.

He was again reported absent from duty on 11-02-2016 **(F/I)** and charge sheeted on 01.04.2016 and inquiry was assigned to Mr. Saleem Shah, Section Officer (R-III) Establishment Department. So, in light of his inquiry report the accused official was penalized with major penalty "removal from service" w.e.f 14.03.2017 **(F/J)**. Later on, on his appeal his major penalty "removal from service" was modified by the appellate authority (Chief Secretary) into minor penalty of "Stoppage of two increments for two years" on 13.09.2017 **(F/K)**.

Mr. Faisal Qader, Driver Administration Department is of the view in his reply to the show cause notice served upon him on his home address under Rule-9 of Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 **(F/L)** that due to illness of his wife he remained absent from duty w.e.f 10.08.2018 to 26.12.2018, while his wife remained admitted in hospital (Ayub Teaching Hospital) from 09.11.2018 to 14.11.2018 (06 days) in Gynae Unite-A as per discharge slip of the hospital **(F/M)**.

12 24  
3103  
Mr. Faisal Qader, Driver Administration Department in his entire service from 16.02.2009 to 14.02.2019 has availed the following leave without pay:-

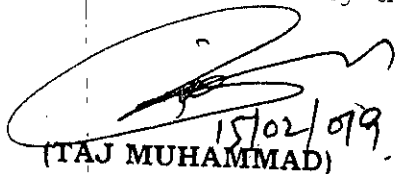
- i. 05.07.2013 to 22.07.2013 (18 days)
- ii. 17.11.2014 to 30.11.2014 (13 days)
- iii. 05.12.2014 to 13.07.2015 (7 months and 8 days)
- iv. 02.02.2016 to 13.03.2017 (1 year, 1 month and 11 days)
- v. Now absent from duty w.e.f 10.08.2018 till date.

**FINDINGS:-**

Mr. Faisal Qader, Driver Administration Department did not bother to appear before the undersigned for inquiry proceedings to defend himself inspite of twice directions through the Section Officer (Transport) Administration Department.

Therefore, the Charges leveled against him have been proved because he is still absent from duty.

Inquiry report is submitted for perusal and further action by the competent authority.

  
15/02/09  
(TAJ MUHAMMAD)  
Section Officer (Cabinet)  
Administration Department  
(Inquiry officer)

اوقات کلینک: بجے 9 سے 5 بجے

Tab Santribe

ناغہ بروز اتوار

MP C. Max

13  
35

Lady  
**DR. NAVEED Bahadur**  
M.B.B.S., R.M.P



اکسٹرنوید بہادر

ایم بی بی ایس، آر ایم پی

یوجسٹ

مان جی کلینک اینڈ میٹرنٹی ہوم

بجنہ روڈ شنگیاری

فون (0997)530332

**SONOLOGIST**

Residence: Bajna Road,  
Shinkhari

Ph: (0997) 530332

Pt's Name: \_\_\_\_\_ Age: \_\_\_\_\_ Sex: *f* R/O: \_\_\_\_\_ Date: *25-8-18*

**Clinical Notes**

*M.P.*  
G 6 P 5 AB 0 AL 5  
Amenorrhoea *810*  
G/O  
Gastric Pain  
Kidney Pain  
L.Ba Pain  
B.P. 110 /mmhg  
Oedema 70  
Temp  
LMP: Unsure.  
EDD

**OBS U/S**

No of Fetuses: One, Two, Three  
Lie: Longitudinal / Transverse / Oblique  
Presentation: Cephalic / Breech / Shoulder  
Liquor: Adequate / Scanty / Excess  
Placenta: Not Pravia / Low Lying  
Cardiac Activity (CA) ++  
Fetal Movement: ++

Any Anomaly: *FLG3*  
BPD / *83* cms  
POG 33 w 2 Weeks  
Edd 11/12/18 (+1)  
(+1 Week)

**Abd & Pelvic U/S**

All abd & Pelvic Organs Including  
IVC, Aorta Liver, G. Bladder  
Spleen, Kidneys, Uterus,  
Ovaries have been scanned  
All show normal echo Patterns  
& no Pathology & no free fluid  
in pelvic cavity except

*Je Co Moepe*  
*Cep Omegru*  
*tu Bnyf*  
*tu Eanyr*  
*Sin Mauch*

*Investigations*  
*Group*  
*AG*  
*area*  
*HE*

△ Tab Genfolate Tab Santribe Syp E.Max

شام - 4 بجے سے شام  
اوقات کلینک: صبح 9 بجے سے شام 4 بجے  
Tab Santribe ناغہ بروز اتوار

NOT VALID FOR COURT OF

14 # 38

# AWAMI CLINICAL LABORATORY

ID No:	311	Date:	12 / 05 / 2019
Name:	Fasial Qadar	Age:	***
Ref by:	Awami Clinic	Sex:	M

## BIOCHEMISTRY

### Blood Sugar

TEST	RESULT	NORMAL
Blood sugar (Fasting)	***	70----110 mg/dl
Blood Sugar (Random)	90	80----160 mg/dl

Husnain Riaz  
MSc Pathology

Signature  
Ahmed Raza  
(B.S HONS) Microbiology

Awami Health Center, Pano Road, Near Nehari Hotel, Main Lari Adda Mansel  
Mobile Number: 03123591321, 03328987

NOT VALID FOR COURT OF LAW

03123591321, 03328987544  
NOT VALID FOR COURT OF LAW

15  
36  
40

SBA 733 Plus Report

Date : 00/04/28 23:15

ID : 001

Test : GLUCOSE

Result : 90mg/dL

Range : 60 -- 180

Lab : AWAMI-LAB

# AWAMI CLINICAL LABORATORY

ID No:	311	Date:	12/05/2019
Name:	Fasial Qadar	Age:	****
Ref by:	Awami Clinic	Sex:	M

## TYPHIODOT TEST

TEST	RESULT	NORMAL
IgG Antibodies	Negative	Negative
IgM Antibodies	Positive	Negative

Husnain Riaz  
MSc Pathology

Signature  
Ahmed Raza  
(B.S HONS) Microbiology

Awami Health Center, Pano Road, Near Nehari Hotel, Main Lari Adda Mansehra.  
Mobile Number: 03123591321, 03328987544

NOT VALID FOR COURT OF LAW

03328987544  
NOT VALID FOR COURT OF LAW



16 39 43

SEA-733 Plus Report

Date : 00/06/52 13:39  
ID : 001  
Item : GLUCOSE  
Result: 309mg/dL  
Range : 60 -- 180  
Lab: AWAMI-LAB

# AWAMI CLINICAL LABORATORY

ID No:	3056	Date:	26-03-2019
Name:	C.O Dani	Age:	**
Ref by:	Dr	Sex:	F

## BIOCHEMISTRY

### Blood Sugar

TEST	RESULT	
Blood sugar (Fasting)	***	NORMAL
Blood Sugar (Random)	309	70---110 mg/dl
		80---160 mg/dl

Husnain Riaz  
MSc Pathology

Signature  
Ahmed Raza  
(B.S HONS) Microbiology

Awami Health Center, Pano Road, Near Nehari Hotel, Main Lari Adda Mansehr  
Mobile Number: 03123591321, 033289875

NOT VALID FOR COURT OF LAW

17 44 38 32  
یزدی ڈاکٹر

Dr. **MRS WAGMA UMER**

MBBS (Pak), RMP  
Gynae, Obs & Ultrasound  
Specialist

Near Fouji foundation  
Hospital, Mansehra

مسز وگمہ عمر

میم بی ایس (پاک)، آراکیم پی  
ہر امراض زنانہ و ذکی، الٹراساؤنڈ  
پیشلسٹ  
د فوجی فاؤنڈیشن ہسپتال، مانسہرہ

Pt's Name Fatima Address \_\_\_\_\_ Age \_\_\_\_\_ Sex f Date 1/8/18

### OBSTETRICAL ULTRASOUND

LMP \_\_\_\_\_

- 1 Number of Fetuses :- ONE / TWO / THREE
- 2 Foetal Cardiac activity :- PRESENT / ABSENT
- 3 Lie :- LONGITUDINAL / TRANSVERSE / OBLIQUE
- 4 Presentation :- CEPHALIC / BREECH / SHOULDER
- 5 Placenta :- ANTERIOR / POSTERIOR / LATERAL
- 6 Amniotic fluid :- ADEOUATE / INCREASED / DECREASED
- 7 Biparietal diameter :- 2.7 cms.
- 8 Gestational Age 14 Weeks 4 days.
- 9 Expected date of delivery 29/12/18.

Conclusion:

Single, alive fetus of 14 weeks  
+ 4 day  
gestat

389  
18  
325  
45



**AYUB TEACHING HOSPITAL, ABBOTTABAD**

**Accident & Emergency Service Department**

3202

Book No.

S. No. 031

Patient ID:

Patient Name:

Patient Age:

Patient Sex:

Patient Date & Time:

Patient Mode:

OPD:

Address:

IDP Status:

Amount:

G

70

318

دوبارہ چھاننے سے پورے سو موٹار OPD تقریباً

**Treatment At Home**

inj. insulin 5/c 30 units 1+1+1  
صبح دوپہر شام جاری

Tab Calures D ایک گولی روزانہ جاری

Tab fironae ایک گولی روزانہ جاری

**Advice on Discharge**

گھر کیلئے ہدایات

طبیعت خراب ہونے کی صورت میں برومٹ  
طیبت خراب ہونے کی صورت میں برومٹ  
طیبت خراب ہونے کی صورت میں برومٹ

اسی خوراک میں گوشت، دودھ، سبز چولہا، سلاڈ  
تجا استعمال کریں، دو ہفتے بعد OPD میں لوٹ لائیں  
دوبارہ چھاننے سے پورے سو موٹار

Signature

Cefamax 400mg

Avellon 400mg

D.Care

Signature  
14/11/18

**AYUB TEACHING HOSPITAL**

ABBOTTABAD  
GYNAE UNIT "A"

**DISCHARGE CARD**

HEAD OF DEPARTMENT  
Prof Dr. Aziz-un-Nisa Abbasi

FRCOG, MRCOG (London)  
FCPS DGO, MCPS (Pakistan)

Associate Professor  
Dr. Aneesa Fawad  
M.B.B.S, F.C.P.S

Associate Professor  
Dr. Aneesa Islam  
M.B.B.S, F.C.P.S, M.C.P.S

Associate Professor  
Dr. Sadia Bibi  
M.B.B.S, M.C.P.S

Name Fatima

Husband's Name Faisal

Date of Admission 9/11/18 Date of Operation           

Date of Discharge 14/11/2018

Serial Number            U.No 5911/12A

Hospital Admission Number 1554927

Diagnosis G6D, Abs Al, 30 at 37<sup>th</sup> week

OPERATION e oligohydromnios + chronic Diabetes  
and poor Bishop

A jmair Press Atd 0321-9835364

19/11/18

20/11/14

Treatment At Home

Investigation	Pre-Op	Post_Op
Blood Group & RH	A, B +ve	
HB%	9.5g/dl	
Platelets	330 x 10 <sup>3</sup> /dl	
Blood Urea	1mg/dl	
Blood Sugar	83mg/dl	
Urine R/E	150mg/dl	
Ultrasound		
HBS	Negative	
HCV	Negative	

Pre-Operative Treatment:  
 inj Decadron 12mg IM stat (2 doses given)  
 inj insulin 30 units SC TDS

Managed Conservatively  
 OPERATION / DELIVERY NOTES

Surgeon: \_\_\_\_\_  
 Anaesthetist: \_\_\_\_\_  
 Indication: \_\_\_\_\_  
 Incision: \_\_\_\_\_  
 Findings: \_\_\_\_\_  
 Procedure: *Antenatal*  
 Histopathology Report: \_\_\_\_\_  
 Baby Notes: \_\_\_\_\_

48 42  
21 47



# AHMED CLINICAL LABORATORY

☎ 03365065568

ID No	107	Date	17/04/2018
Name	Fatima bibi	Age/Sex	Female
Ref By	Self	Spec	

## BIOCHEMISTRY

TEST	RESULT
Blood Sugar (Fasting)	*** mg
Normal Value:	70 - 110 mg/dl
Blood Sugar (Random)	276 mg/dl
Normal Value:	80 - 160 mg/dl

Signature:

Dr. Qazi Ijaz Ahmed

M.B.B.S Peshawar,  
DMJ Lahore

(Not Valid for Court)

IQBAL AHMED ALVI

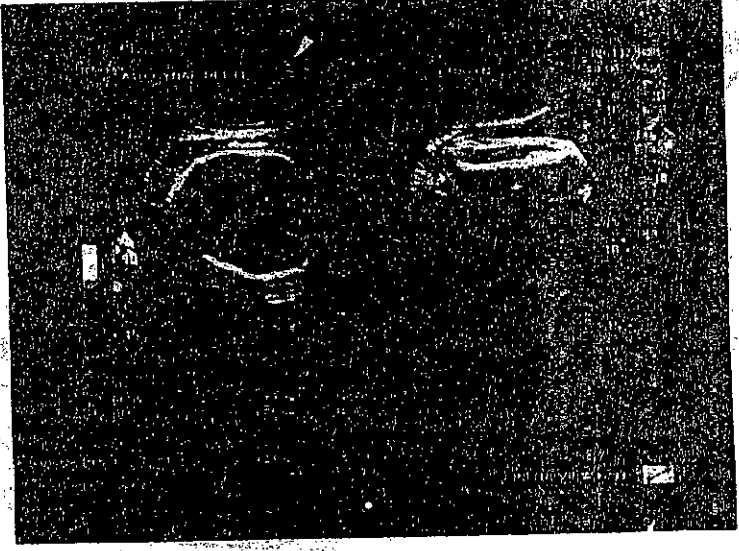
Microbiologist(M.Phil)

Near Raja Hotel, Pano Road Lari Adda Mansehra

NOT VALID FOR COURT

Handwritten notes and signatures at the bottom of the page, including the word 'last' and a signature.

**CHANZEB FAMILY  
HOSPITAL  
MATERNITY HOME**



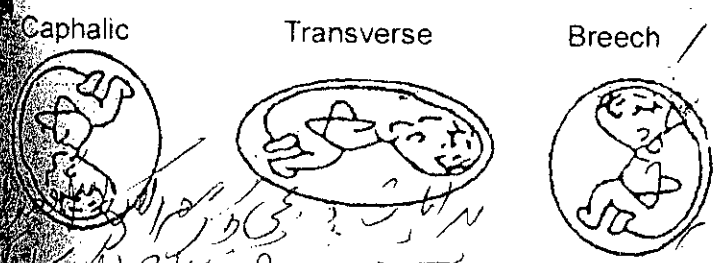
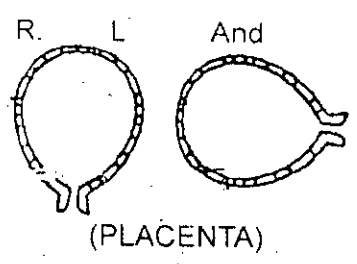
Name: Fatma Ziki

- \* Ultrasound Findings *Clot*
- \* No of Foetuses *pw bl*
- \* Lie *One / Tw* Longitudinal / Transverse
- \* Presentation *prim* Cephalic / Breech
- \* Foetal Heart Beat Present / Absent
- \* Foetal Movements Present / Absent
- \* Crown Rump Length .....cme
- \* Dipartal Diameter .....cme
- \* Femur Length .....cme
- \* Gestational Age On Measurement .....wke
- \* E.d.d .....cme

*6/15 AT 4 138 BD*  
*SH NVD 1 BB*  
*In labour 2yrs*

- \* FUNDAL ANTERIOR/POSTERIOR
- \* RIGHT/LEFT UTERINE WALL
- \* UPPER SEGMENT/LOWER SEGMENT
- \* PLACENTAL LYING
- \* \_\_\_\_\_ COVERING INT OS/
- \* \_\_\_\_\_ NOT COVERING INT OS/

*grossly I baby delivered via NVD for home; at Glucocance; 1-11*  
*Cap veloce*  
*1-11 500*  
*Plagyl 4mg*  
*1-11*  
*1mg/5ml folic*  
*1-11*  
*Perin*  
*1-11*



NOT VALID FOR COURT

231  
 23  
 23

**KHAN JEE**  
 CLINICAL LABORATORY  
 Shinkari



Patient's Name Mrs. Shamim Afzal Age & Sex F  
 Referred by abg Lab: No 694  
 Specimen Blood Date 25/10/2018

**BIOCHEMISTRY**

TEST	NORMAL RANG	RESULT	TEST	NORMAL RANG	RESULT
Glucose (F)	70-110	mg/dl	Magnesium	2.1-5.2	mg/dl
Glucose (R)	Hr. Pc	128 mg/dl	Lithium	TL 0.5-1.5	mEq/L
Lipids Total	400-800	mg/dl	Serum iron (total)	50-150	ug/dl
Cholesterol	150-250	mg/dl	TIBC	250-450	ug/dl
Triglycerides	50-150	mg/dl	L.F.T.		
HDL	M >15 F >65	mg/dl	Bilirubin (total)	0.1-1.0	mg/dl
LDL	< 150	mg/dl	Direct	upto 0.25	mg/dl
<b>CARDIAC ENZYME</b>			Indirect	0.75	mg/dl
SGOT	upto 12	U/L	SGPT	upto 12	U/L
LDH	80-285	U/L	Alk Phos	15-70	U/L
CPK	25-100	U/L	Total Proteins	6.0-8.0	G/dl
Acid Phos	0-7.1	U/L	Albumin	3.2-4.8	G/dl
Amylase	60-160	Su/dl	Globulins Total	2.5-3.6	G/dl
Urea	18-40	mg/dl	Gamma Globulins	1.5-1.6	G/dl
Uric Acid	M.2.5-7 F.2-6	mg/dl	<b>URINE CHEMISTRY</b>		
Creatinine	0.5-1.5	mg/dl	Calcium	100-300	G/dl
Creatinine Clearance	M 113-197 F 92-132	mg/min	Creatinine	1.5-1.5	mg/dl
Sodium	136-165	mmol/L	Chloride	110-250	mg/day
Potassium	3.5-5.5	mmol/L	Creatinine	1.5-2.0	G/day
Chloride	98-107	mEq/L	Phosphorus	upto 1000	mg/day
Calcium	9-11	mg/dl	Uric Acid	300-800	mg/day
Phosphorus	3.0-4.5	mg/dl	Urine Proteine 24 hours	25-150	mg/day
Remarks					

Signature

*[Handwritten signature]*



KING ABDULLAH TEACHING HOSPITAL

MANSEHRA

45 313  
5/24

FILTER OUT PATIENT DEPARTMENT

Patient Name: FATIMA BIBI

Patient ID:

Patient Sex:

Patient Yearly No: 156759

Patient Age

Patient Date & Time: 24 Oct 18 09:37 AM

Address

OPD:

Amount Rs. 10

Computer Operator: JAWAD

1st visit

prev. NVD.

C<sub>15</sub>P<sub>15</sub>A<sub>14</sub>

Hx of diabetes  
in this pregnancy on  
oral Rx.

WB → 2 1/2 yr

LMP - 11-3-2018  
EDD - 18-12-2018  
DOP - 32wks -

Pk - C/A - 8 months

B. P 110/70

- ANC

Adv

- Blood CP
- Urine R/E
- BSR

- Blood group
- Hb<sub>s</sub>A<sub>1c</sub>
- Anti HCV
- obs. USG

46 31  
15  
25



# AHMED CLINICAL LABORATORY

03013003139

ID No: 01	Date: 23/07/2018
Name: Fatima	Sex: Female
Ref By: Dr Qazi Ijaz Ahmed	Age: ***

## BIOCHEMISTRY

TEST	RESULT
Blood Sugar (Fasting)	mg/dl
Normal Value:	70 - 110 mg/dl
Blood Sugar (Random)	205 mg/dl
Normal Value:	80 - 160 mg/dl

**Dr. Qazi Ijaz Ahmed**

M.B.B.S Peshawar,  
DMJ Lahore

(Not Valid for Court)

Signature:

**IQBAL AHMED ALVI**  
Microbiologist(M.Phil)

Near Raja Hotel, Pano Road Lari Adda Mansehra



# AYUB TEACHING HOSPITAL ABBOTTABAD

## FILTER OUT PATIENT DEPARTMENT

52/47 31/26

B.Code No: \_\_\_\_\_

Book No: A5805

Patient Name: \_\_\_\_\_

Appointment Time: 08:29

Patient Sex: FATIMA BIBI

Patient Yearly No: K0400001552214

Patient Age: Female

Date & Time: \_\_\_\_\_

Address: 30 Year(s)

O.P.D: 08-10-2018 08:28:25

Amount: \_\_\_\_\_

Computer Operator: GYNEA-D - OPD

10.00

**Token# 004**

*Handwritten notes:*  
C.P. Ab  
BS  
30/10

*Handwritten notes:*  
Advis - urgent plz  
① USG for fetal well being  
② Mwdp c/n  
10/11/18  
8:30

*Handwritten notes:*  
1. Dig. Tablets plus  
2. Tab. MPCA  
Admit Gynae Dw -  
Patient refused admission  
despite 9 nurses  
Enter today

2748  
31

**MEDICAL TEACHING INSTITUTION ABBOTTABAD**

Ayub Teaching Hospital Phone: 0992-380813, Fax: 0992-380328  
Email: info@ath.gov.pk, Website: www.ath.gov.pk



**Department of Radiology**

VIEW: 08-Nov-2018 09:59:02

**Ultra Sound Report**

Page 1 of 1

MRNO : K04-00001552214  
Dept Ref# : 18-0022496  
Name : FATIMA BIBI  
Age/Sex : 30 Year(s)/Female  
Address: , ABBOTTABAD - PAKISTAN

Order By : Sohrab  
Referring Physician :  
In-house Consultant : Anisa Fawad  
Destination(s) of Report: **Main Reception**  
Request Date : 08-Nov-2018 09:40:53 AM  
Perform Date : 08-Nov-2018 09:52:44 AM  
Report Date : 08-Nov-2018 09:57:03 AM

**CPT : ULTRASOUND PELVIS (OBSTETRICS)**

**HISTORY** : OK

**REPORT** : Findings:

Gravid uterus with single alive fetus

Presentation: cephalic  
Liquor: 1.2+1.3+2.1+0= 4.6 AFI  
Placenta: anterior

BPD:8.3cm  
FL:6.7cm: POG:34w1d EDD: 19/12/18

fetal kidneys visualized, appear normal .

**CONCLUSION** : oligohydromnios  
scan by Dr Aniq

**DR. GHAYYUR KHAN**  
**DR. ANIQA KHURRAM**

Electronically verified report, no signature(s) required.

PROF DR MJEHANZAIB  
Consultant Radiologist

DR GHAYYUR KHAN  
Associate Professor

DR FAIZA AKRAM  
Associate Professor

DR AZMAT ALI  
Assistant Professor

28 49 30  
47

KING ABDULLAH TEACHING HOSPITAL MANSEHRA

RADIOLOGY DEPARTMENT

Name Fatma Age \_\_\_\_\_ Sex \_\_\_\_\_ Dated 7/9/2016

ULTRASOUND REPORT

GRAVID UTERUS HAVING SAF Low

Foetal Cardiac activity

Foetal movements 1 Point

Lie Longitudinal

Presentation Cephalic

Liquor Decreased AFI: 2.0 cm

Placenta anterior

B.P.D 8.5 cm

Femur Length 6.6 cm

Abdominal Circumference

Head Circumference

Gestational Age 34 w 3 d

E.D.D 26-12-2015 week

[Signature]  
Radiologist/Sonologist

# KHAN JEE

CLINICAL LABORATORY

Shinkiari



Patient's Name

Mrs. Shamim Afzal

Age & Sex

Referred by

Lab: No

Specimen

Urine-Pregnancy Blood

Date

03/08/12

## IMMUNOLOGY

TEST	RESULT	TEST	RESULT
V.D.R.L.		WIDAL TEST	
A.S.O. Titre		S. Typhi "O"	
C-Reactive Protein (CPR)		S. Typhi "H"	
Rheumatoid Factor		Paratyphi "AH"	
Montoux - 1. Tu		Paratyphi "BH"	
Montoux - 5. Tu.		Brucella Test	
Blood Group	(AB +ve)	Toxoplasma	
Rh Factor	positive	HBS Ag	Negative
Comb's Test (Direct)		HCV	Negative
Comb's Test (Indirect)		H.I.V. Ant	
Pregnancy Test			

Remarks

32

30  
29/1  
81  
15/1

گھنور صاحب سیکشن امسٹر عاصف محلہ ایڈمنسٹریٹیشن گھنور

26-12-2018

جواب طلبی

صاف عالی

مودہ ماہہ ترا میں ہے کہ سائل محلہ ایڈمنسٹریٹیشن  
غیر کھیتوں خواہ میں لغور ڈرا ہیور ملازم ہے۔ سائل کی بہو  
شدید بیمار تھی جسکی وجہ سے سائل نے اسے ایس ایف ٹیجنگ  
ہسپتال میں داخل کرا یا۔ کاغذات لف ہیں۔ جسکی وجہ سے  
سائل 10-8-2018 سے غیر حاضر رہا۔ اور اب صاف کے  
سائل سے ہر دئے جھٹی لٹر 2008 (264) 02 (AD) E4A تاریخ 12-2018  
غیر حاضر رہنے پر جواب طلبی کی ہے

چونکہ سائل امیر جنسی میں بہو کے شدید بیمار  
تھوہ سے لغیر اخلدع دیے جاؤں چلا گیا۔ اور 12-2018  
کو موٹو توره بلا جھٹی ملاتے ہی سائل ڈیوٹی پر حاضر  
لیڈا انسانی خمد دی کی بنا پر سائل کو تعاف کیا گیا  
اور سائل ابیدہ محنتا رہیگا۔

2018

سائل فصیل قادر ڈرا ہیور ایڈمنسٹریٹیشن گھنور  
غیر کھیتوں خواہ کے

Pt. Name: Fatma

300

Wt: Faisal

Bed No: 9

31  
52

Abetic Diet chart.

دودھ و ابی چائے (بغیر چھنی کے)  
دو عدد رسک یا اسی کے بدل روٹی  
ایک گلاس دودھ یا اسی کے بدل سو اونس (100 ml)  
دودھ کے ساتھ کارٹ ملیک

صبح 6 بجے

پ، آرد، خربانی، امرود

صبح 11 بجے

بھنڈی گوہی سبز، چنڈا، پاپ  
کے پتے، ٹماٹر، سلیم، کرلا

دوپہر دو بجے

ایک کپ چائے بغیر چھنی، ایک یادو بیکریٹ  
پارسل

سٹام 5 بجے

بھی یا مازن سوپ، بغیر چھنی آٹے کی دو  
ایک سو فی جاؤل مچلی، جلی بریٹ یا دال

رات 8 بجے

دال سبز کر پی، چھنی، جاؤل، آلو، تیر مرچیں  
مچھی سمروں سے، خشک پیاز



ID = 4652  
 ID2 =  
 SEQ = 182  
 DATE = 07/11/2018  
 TIME = 09:32:43  
 BLOOD OT  
 Normal ranges  
 RBC = L 2.96  $10^{12}/l$  3.50 : 5.50  
 MCV = 77.1 fl 75.0 : 100.0  
 RDW% = 13.4 % 11.0 : 16.0  
 HCT = L 22.9 % 35.0 : 55.0  
 PLT = 254  $10^9/l$  100 : 400  
 MPV = 8.4 fl 8.0 : 11.0  
 WBC = 5.9  $10^9/l$  3.5 : 10.0  
 HGB = L 7.7 g/dl 11.5 : 16.5  
 MCH = 26.2 pg 25.0 : 35.0  
 MCHC = 33.9 g/dl 31.0 : 38.0  
 LYM = 2.3  $10^9/l$  0.5 : 5.0  
 GRAN = 3.1  $10^9/l$  1.2 : 8.0  
 MID = 0.5  $10^9/l$  0.1 : 1.5  
 LYM% = 38.8 % 15.0 : 50.0  
 GRA% = 52.5 % 35.0 : 80.0  
 MID% = 8.7 % 2.0 : 15.0

~~53~~  
 303  
 32  
 301

FBS 95 mg/dl  
 IP AB +ive  
 Hbs Ac -> Negative  
 for Hbs -> Negative

S.M. Jh  
 02-03  
 10-8  
 2

# MEDICAL TEACHING INSTITUTION ABBOTTABAD

Ayub Teaching Hospital. Phone: 0992-380813, Fax: 0992-380328  
Email: info@ath.gov.pk, Website: www.ath.gov.pk



33  
304  
54  
91

Nov-2018 12:08:39

## Haematology Report

Page 1 of 1

Order ID : K04-00001552214  
Name : FATIMA BIBI  
Age/Sex : 30 Year(s)/Female  
Address : , ABBOTTABAD - PAKISTAN

Ordered By :  
In-house Consultant : Anisa Fawad  
Report Destination : Main Reception  
Requested : 08-NOV-2018 10:12:23  
Specimen Received : 08-NOV-2018 10:20:05  
Reported : 08-NOV-2018 11:54:33

### Haematology - Misc

TEST(S)	NORMAL RANGE(S)	UNIT(S)	RESULT
	0 - 20	mm/1st hr	80

K04HEM181861  
29  
08-NOV-18  
11:54:33

Lab values should always be correlated with clinical picture. Normal Range(s) and Unit(s) shown are for most recent results.

MOHAMMAD ARSHAD  
Sr. Medical Technologist

Electronically verified report, no signature(s) required.



34-307/55/81

08-11-2018 12:08:40

**Haematology Report**

Page 1 of 1

04-00001552214

FATMA BIBI

30 Year(s)/Female

ABBOTTABAD - PAKISTAN

Ordered By

In-house Consultant : Anisa Fawad

Report Destination : Main Reception

Requested : 08-NOV-2018 10:12:23

Specimen Received : 08-NOV-2018 10:20:05

Reported : 08-NOV-2018 11:25:51

NORMAL	UNIT(s)	K04HEM181861 29 08-NOV-2018 11:25:51
4 - 11	x10.e 3/ $\mu$ l	6.7
4 - 6	x10.e 6/ $\mu$ l	3.46
11.5 - 17.5	g/dL	8.9
36 - 54	%	27.5
76 - 96	fL	79.5
27 - 33	pg	25.7
33 - 35	g/dL	32.4
11.5 - 14.5	%	14.4
150 - 400	x10.e 3/ $\mu$ l	334
7.2 - 11	fL	10.3
40 - 75	%	60.3
20 - 45	%	36.3
2 - 10	%	3.4
1.9 - 8	x10.e 3/ $\mu$ l	4.1
0.9 - 5.2	x10.e 3/ $\mu$ l	2.4
0.16 - 1	x10.e 3/ $\mu$ l	0.2

Lab values should always be correlated with clinical picture.  
 Normal Range(s) and Unit(s) shown are for most recent results.

**Muhammad Ameen**  
 Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR. MUHAMMAD IDRESS  
 MBBS, FCPS Clinical Hematology

DR. SHABANA NAZ  
 MBBS, FCPS (Histopathology)  
 Assistant Professor Pathology

DR. SHAGUFTA NAEEM  
 MBBS, FCPS (Histopathology)

DR. FIAZ AHMAD  
 MBBS, FCPS-1, M.Phil

S.O. (Admin.) Administration Deptt. 56 300/35  
Diary No. 2387  
Date 3-7-18

PA.DS (Administration Deptt.)  
Dairy No. 2185 Dated 02/07/18  
**BEFORE THE WORTHY CHIEF SECRETARY  
K.P.K. PESHAWAR**

PS/C.S Khyber Pakhtunkhwa  
Diary No. 6644/18  
Date 01/07/2018

Subject: - **APPEAL FOR REINSTATEMENT  
IN SERVICE WITH BACK  
BENEFITS.**

**PRAYER: -**

Ps to Secy Admin  
Dairy No. 2635 Date: 02/07/18

On acceptance of appeal the order of Secretary Government of Khyber Pakhtunkhwa Administration Department, Removal from Service may kindly be set aside and appellant may kindly be reinstated in service with back benefits.

**Respectfully Sheweth!**

1) That, appellant was appointed as a Driver in Administration Department Khyber Pakhtunkhwa in the year 2007 and served as such for considerable period and never afforded any chance of complaint to his higher officials.

2) That, appellant was serving in Peshawar a message received about the illness of his wife, so appellant left Peshawar and reached to his native village Sum Illahi Mang, Mansehra. After reaching came to know that my wife was serious ill so, I alongwith my wife went to Abbottabad Ayub Teaching Hospital where doctor examined my wife and opined that my wife is suffering from diabetic, high blood pressure and kidney problems.

(Copies of medical certificates are here attached with)

3) That, the illness of my wife was so sewer, doctor admitted my wife in hospital during to serious illness no other male or female members were available at my home or village, the appellant was only member to look-after his ailing wife and due to this reason appellant could not intimate to his department, appellant's parents and my wife parents has been died, so, the

2007  
SECY:(ADMIN)  
Jafar Khan

Secy Admin

Chief Secretary  
Khyber Pakhtunkhwa

30/07/18  
S.O. (A)

Supervisor

38  
3/7/19

36  
16/301  
59

appellant is only sole member to look-  
after my wife and beside my children.

- 4) That, the appellant was served charge sheet alongwith summary of allegation and appellant gave detailed reply, appellant has never received any show cause notice or final show cause notice. In the absent of appellant the procedure of inquiry conducted by department has been blatantly violated by the Inquiry Officer.

(Copies of charge sheet alongwith summary of allegation and appellant detail reply to the charge sheet are herewith attached).

- 5) That, the inquiry office has not applied his independent mind rather has acted in according with his sweet will and choice which is not object of law.
- 6) That, the absence of appellant is not deliberate nor intentional but on account of serious illness of my wife and account of above noted reason appellant resumed his duty nor could informed that authority.
- 7) That, appellant is belongs to a poor family and his entire family members are depended upon him and appellant is only source of earning the livelihood.
- 8) That, on account of impugned order not only the appellant but his entire family members are passing hard time.

It is, therefore, most humbly prayed and requested that the order of Secretary removal from service may kindly be set aside and appellant may kindly be reinstated in service with back benefits.

Dated 28.06.2019

*Faisal Qadar*  
**Faisal Qadar**

Ex-Driver (BPS-6)

Govt. of K.P.K.

Administration Department

Presently Village Sum Illahimang

Tehsil and District Mansehra



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

13  
37

Dated: 22-03-2019

ORDER

No.E&A(AD)2(264)/2008 WHEREAS, Mr. Faisal Qadar, Driver (BPS-06) was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges mentioned in the Charge Sheet and Statement of Allegations dated 08-01-2019.

2. AND WHEREAS, Mr. Taj Muhammad Section Officer (Cabinet) Administration Department was appointed as Enquiry Officer by the competent authority to conduct enquiry against the accused.
3. AND WHEREAS, the inquiry officer called the accused on 28-01-2019 and 07-02-2019 for personal hearing and to record written statements but he did not appear before the inquiry officer for inquiry proceedings. Therefore, the inquiry officer after having examined the charges and evidence on the record of the accused official, submitted report.
4. AND WHEREAS, a show cause notice was served on the accused official on 22-02-2019 and he was directed to show cause as to why penalty of removal from service should not be imposed on him. The accused was also directed to intimate whether he desires to be heard in person, but he neither resumed duty nor submitted reply within 15 days i.e. up-to 08-03-2019.
5. NOW, THEREFORE, the Competent Authority after having considered the charges, evidence on record and exercising his powers under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, has been pleased to impose a major penalty of "Removal from Service" on Faisal Qadar, Driver (BPS-06) with immediate effect.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

ENST OF EVEN NO & DATE.

Copy forwarded to the: -

- 1) Accountant General, Khyber Pakhtunkhwa.
- 2) Section Officer (Transport) Administration Department
- 3) Bill Assistant, E&A Department.
- 4) Mr. Faisal Qadar, Ex-Driver S/O Abadul Qadar R/O Janu Mandi, PO Sum Elahi Mang, Tehsil & District, Mansehra.
- 5) Personal File

*[Signature]*  
25/3/2019  
SECTION OFFICER (ADMN)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

64  
24859  
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Dated :13-09-2017

**ORDER.**

**No.E&A(AD)02(264)2008.** In partial modification of Administration Department's order of even No dated 15-03-2017, I, the Appellate Authority, after having considered the charges, evidence on record, and exercising the powers under *Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011*, have decided to modify the penalty of Mr. Faisal Qader, Driver (BPS-06) from 'removal-from-service' to 'stoppage of two increments for two years' w.e.f 14-03-2017 (A/N). The absence period of the official w.e.f 02-02-2016 to 13-03-2017 will also be treated as leave-without-pay.

-sd-  
CHIEF SECRETARY  
KHYBER PAKHTUNKHWA.

Endst of even No & date.

ole

Copy forwarded to the :

1. Accountant General , Khyber Pakhtunkhwa
2. PS.to Secretary (Admn) Administration Dept.
3. Bill Assistant, E&A Department
4. PA to Deputy Secretary (Admn) Administration Dept.
5. Official concerned
6. Personal File

19/9/17

13/9/17

14-09

(KAMRAN KHATTAK)  
SECTION OFFICER (ADMN)

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Annex - V



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

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No. E&A(AD)Pfile/Faisal Qader, Driver  
Dated Peshawar the 08-2019

To:

Mr. Faisal Qader, ex-Driver  
S/O Abdul Qader,  
R/O Janu Mandi, PO Sum Elahi Mang,  
Tehsil & District Mansehara.

Handwritten signature and date: 23/08/19

Subject: DEPARTMENTAL APPEAL FOR RE-INSTATEMENT IN SERVICE.

I am directed to refer to your Departmental Appeal for re-instatement in service dated 28-06-2019, and to inform you that after examination of your case the Appellate Authority has regretted your appeal being time barred.

SECTION OFFICER (ADMN)

Handwritten signature and date: 22/08/19

Endst of even No & date.

Copy forwarded for information to:

- 1. Section Officer (Transport), Administration Department.
- 2. PS to Secretary Administration Department.

Handwritten note: 23/8/19

SECTION OFFICER (ADMN)

Handwritten signature and date: 22/08/19

Handwritten initials: Q/C

The hours of attendance in the court are...  
Always quote Case No. While making any correspondence

Handwritten signature





THROUGH REGISTERED DAK

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ADMINISTRATION DEPARTMENT

No. E&A(AD)/02(264)2008  
Dated Peshawar the 12-12-2018

To

Mr. Faisal Qader (Driver)  
S/O Abdul Qader  
R/O Janu Mandi, PO Sum Elahi Mang,  
Tehsil & District Mansehara.

SUBJECT: SHOW-CAUSE NOTICE.

You are absent from duties since 10-08-2018 without intimation or prior approval which amount to misconduct and makes you liable to be proceeded against under the Khyber Pakhtunkhwa Government Service (Efficiency & Discipline) Rule, 2011.

2- You are, therefore, directed to report for duty and occupy your position within fifteen (15) days failing which stern disciplinary action will be initiated against you under the rules ibid.

(MUHAMMAD YOUSAF K  
SECTION OFFICER (AI

End of even No & date

A copy is forwarded to Section Officer (Training & Administration Department

SECTION OFFICER (AI