

19.05.2023

Learned counsel for the appellant present. Mr. Abdur Rasheed, Superintendent alongwith Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 10.07.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar

Naeem Amin

(Muhammad Akbar Khan)
Member (E)

(Salah-ud-Din)
Member (J)

10th July, 2023

1. Counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

2. Learned counsel for the appellant seeks adjournment in order to further prepare the brief. Granted. To come up for arguments on 06.11.2023 before the D.B. Parcha Peshi given to the parties.

(Fareeha Paul)
Member (E)

(Kalim Arshad Khan)
Chairman


Fazle Subhan P.S

SCANNED
KPST
Peshawar

05th Dec. 2022

Appellant present in person. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Appellant seeks adjournment due to engagement of his learned counsel in Honourable Peshawar High Court today. Last opportunity is granted. To come up for arguments on 01.03.2023 before the D.B.


(Fareeha Paul)
Member (E)

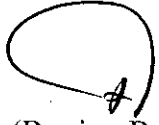

(Kalim Arshad Khan)
Chairman

1st Mar, 2023

SCANNED
KPST
Peshawar

Appellant in person present. Mr. Muhammad Jan, District Attorney for respondents present.

Counsel are on strike. The case is adjourned. To come up for arguments on 19.05.2023 before D.B. PP given to the parties.


(Rozina Rehman)
Member (J)


(Kalim Arshad Khan)
Chairman

2-8-2022

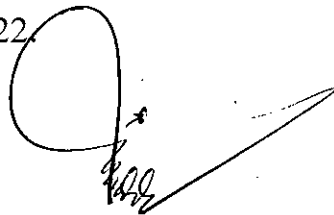
Proper DB not available the
case is adjourned to 31-10-2022


Reader

31.10.2022

Junior of learned counsel for the appellant present. Mr.
Muhammad Jan, District Attorney for the respondent present.

Junior of learned counsel for the appellant requested for
adjournment on the ground that learned counsel for the appellant
is before honourable Peshawar High Court, Peshawar.
Adjourned. To come up for arguments before the D.B on
05.12.2022.



(Mian Muhammad)
Member (E)




(Salah-ud-Din)
Member (J)

06.10.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Written reply/comments of the respondents is still awaited despite extension of time. Last opportunity is granted to respondents to furnish reply/comments within 10 days in office, failing which their right for reply shall be deemed as struck off. Case to come up for arguments before the D.B on 03.01.2022 before the D.B.

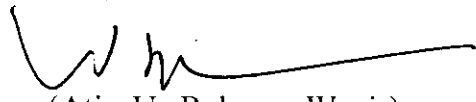

(Mian Muhammad)
Member(Executive)


Chairman

03.01.2022

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, AAG for respondents present.

Reply/comments on behalf of respondents are still awaited. Representatives of respondents sought time for submission of reply/comments. Another last opportunity is granted to respondents to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 12.04.2022.


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

12.04.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak Addl. AG for respondents present.

Learned counsel for the appellant request for adjournment. Request accepted. To come up for arguments before D.B. on 02.08.2022


(Rozita Rehman)
Member (J)


Chairman


31.03.2021

Junior to counsel for the appellant present.

Addl: AG alongwith for respondents present.

Written reply/comments not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments.

Adjourned to 01.06.2021 before S.B.

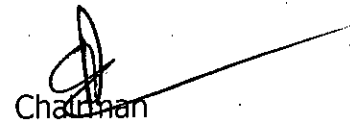

(Atiq Ur Rehman Wazir)
Member(E)

01.06.2021

Junior to counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney alongwith Ubaidullah, Superintendent for the respondents present.

Stipulated time has passed and reply has not been submitted.

Representatives of the respondents seeks further time to furnish reply/comments. Respondents are required to furnish written reply/comments in office within 10 days. If the written reply/comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 06.10.2021 before the D.B.


Chairman

P.S

11.06.2021

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


Chairman

P



17.11.2020

Counsel for the appellant present.

01.02.2021

~~Junior to counsel for the appellant and Addl. AG~~
the respondents present.

Contends that on 21.03.2017 the appellant was suspended from service for allegedly receiving Rs. 4,20,000/- as Tax unlawfully, delaying in attestation of mutation and keeping one Kashif as Munshi. The impugned order dated 31.07.2019, on the other hand, provides that the appellant was penalized for the purpose of willful absence from duty, that too, from the date of his absence. In the order, however, the period of his alleged absence was nowhere provided.

Chairman

In view of the available record and arguments, this appeal is admitted to regular hearing, subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 01.02.2021 before S.B.

Appellant Deposited
Security & Process Fee

17/11/20



Chairman

01.02.2021

Junior to counsel for the appellant and Addl. AG
the respondents present.

Learned AAG requests for time to contact the respondents and furnish reply/comments. Adjourned to 31.03.2021 on which date the requisite reply/comments shall positively be furnished.



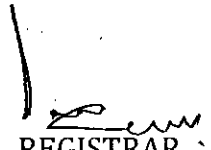


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 8489 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/07/2020	<p>The appeal of Mr. Sher Alam presented today by Mr. Javed Iqbal Gulbella Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	14.09.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14/09/2020</u>.</p> <p> CHAIRMAN</p> <p>Mr. Mansoor Salam, Advocate on behalf of counsel for the appellant present.</p> <p>Requests for adjournment as wife of learned counsel is indisposed and he is attending patient. Adjourned to 17.11.2020 before S.B.</p> <p> Chairman</p>

SCANNED
KFST
Peshawar

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A. 8489/2020

Sher Alam

VERSUS

S.M.B.R through its Chairman & Others

INDEX

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Dated : 24/07/2020

Appellant

Through

JAVED IQBAL GULBELA

Advocate, High Court,
Peshawar.

Off Add: 9-10A Al-Nimrah Centre, Govt College Chowk Peshawar

①

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2020

Sher Alam, Ex- Patwari, District Peshawar.
-----(*Appellant*)

VERSUS

1. Senior Member Board of Revenue through its Chairman, Peshawar
2. Commissioner, Peshawar Division Peshawar.
3. Deputy Commissioner, Peshawar Division, Peshawar.

-----(*Respondents*).

**Appeal U/S 4 Of The Khyber
Pakhtunkhwa Services Tribunal Act -1974
Against The Impugned Order No: 1686/Dk
Dated 31/07/2019 Of The Office Of The
Deputy Commissioner Peshawar, Whereby
The Appellant has been Removed From
Service In An Illegal, Whimsical And
Cursory Manner.**

Respectfully Sheweth;

1. That after going through the mandatorily required criteria laid down the Appellant got inducted into service as Patwari in the year 2005.
2. That Appellant was inducted into service years back, and the Appellant has always remained a dutiful, obedient,

②

hard working & punctual Civil Servant, who never left any stone unturned in performance of his duties.

3. That it was in this back drop that abruptly the Appellant was suspended vide impugned office order No: 5147/DC (P)/EA dated 21/03/2017 of the office of the Deputy Commissioner Peshawar on miserable pretensions **(Copy of the Suspension order dated 21/03/2017 is annexed herewith as annexure "A")**
4. That the impugned event of suspension took place in March 2017, but the Appellant was removed from service, like bolt from the blue, vide impugned office order No: 1686/DK, dated 31/07/2019 by the Deputy Commissioner Peshawar in a classically, cursory and whimsical manner on the alleged ground of absence from duty. **(Copy of impugned removal order dated 31/07/2019 is annexed as annexure "B")**
5. That feeling aggrieved the Appellant preferred departmental appeal for setting aside the impugned removal from service order and for his re-instatement with all back benefits on 20/08/2020, but inspite of lapse of statutory period,

(3)

nothing came out. (Copies of Departmental Appeal are annexure "C")

6. That feeling aggrieved the Appellant prefers the instant Appeal for setting aside the impugned removal from service order & for reinstatement into service with all back benefits upon the following grounds inter-alia:-

GROUND:

- A. That no enquiry has been conducted and the Appellant was removed from service, therefore, the impugned suspension and removal from service order is unlawful, illegal void ab-initio and not sustainable in the eye of law.
- B. That even there is no inquiry dispensation order, and on this score alone the impugned order is illegal and void ab-initio.
- C. That no charge sheet of allegation was issued or served upon the Appellant, and thus the impugned orders are not sustainable at all.
- D. That even no statement of allegation was either issued or served upon the Appellant, hence, the impugned orders

(4)

are illegal, unlawful, void ab-initio and are liable to be set aside.

E. That even no show-cause notice or final show-cause notice was given to the Appellant which is mandatory obligation on the part of competent authority, therefore, the impugned orders are wrong, illegal, whimsical, unlawful, void ab-initio and not sustainable in the eye of law and on this score alone the Appellant is entitle to be reinstated into service with all back benefits.

F. That the Appellant was never called upon by the enquiry officer or any enquiry committee to explain his position or to extend a fair chance of defense to the Appellant, and abruptly removed the Appellant from service which is illegal, unlawful and against the rights of the Appellant.

G. That Appellant is suffering from serious disease of Thyroid Cancer and got his treatment from Shoukat Khannum Memorial Cancer Hospital & Research Center Lahore and in this worst health condition and never willfully remain absent, but even then the competent authority removed the Appellant from

⑤

service without any fault on the part of the Appellant, therefore, the impugned orders are illegal, unlawful, void ab initio and against the law and the Appellant is entitle to be reinstated. (Copies of medical documents are annexed as Annexure "D")

- H. That even in the impugned orders, no period of alleged absence was mentioned or pin pointed wherein the Appellant remain absent, which shows the baselessness of allegations.
- I. That even the competent authority is unaware of the law on the subject that suspension period, if not extended expressly shall automatically concludes after three months, but in the very impugned orders the competent authority writes that "the Appellant found suspended" which is not appealable to a prudent mind and shows the vacuumness and hollowness of the impugned removal order.
- J. That from every angle the impugned removal from service order is wrong, void and illegal and is liable to be set aside and the Appellant is liable to be

(6)

reinstated into service with all back benefits.

K. That the appeal of the appellant was simply shelved without any reason.

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

It is therefore most humbly prayed that on acceptance of this Service Appeal, the impugned removal order No: 1686/DK, dated 31/07/2019 of the office of Deputy Commissioner Peshawar may kindly be set aside and by doing so, the Appellant may kindly be reinstated into service with all back benefits.

Any other relief not specifically asked for may graciously be extended in favor of the appellant, in the circumstances of the case.

Dated: 24/07/2020

Petitioner

Through

Javed Iqbal Gulbela

Israr Ahmad

Saghir Iqbal Gulbela

Ahsan Sardar

&

Tahir Khan

Advocates, High Court

Peshawar

NOTE:-

No such like service appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.

Advocate.

(7)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2020

Sher Alam

VERSUS

S.M.B.R through its Chairman & Others

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth,

1. That the Petitioner/ Appellant is filing the accompanying service appeal the contents of which may graciously be considered as integral part and parcel of the instant petition.
2. That the Petitioner/ Appellant has got a good arguable and prima facie case, besides having balance of convenience in his favor.
3. That the delay occurred in filing the accompanying Service Appeal was due to the reason that firstly paternal uncle of the Petitioner/ Appellant passed away due to COVID-19 pandemic and just after few days, two other close relatives of the Petitioner/ Appellant breathed

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their last because of the Covid 19 pandemic and repeated lock downs thereafter and its impact (Social/Economical) upon the Petitioner/Appellant.

4. That the delay in approaching the Hon'ble Tribunal was never deliberate, but due to the aforementioned reasons which were certainly behind his control.
5. That if the instant application is not allowed the petitioner shall suffer irreparable loss.

It is, therefore, must humbly prayed that delay in filing the accompanying service appeal may graciously be condoned and the same be decided on its merits.

Petitioner/ Appellant

Through

Javed Iqbal Gulbela
Advocate, High Court
Peshawar.

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**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2020

Sher Alam

VERSUS

S.M.B.R through its Chairman & Others

AFFIDAVIT

I, Sher Alam Khan S/o Muhammad Zarin Khan R/o Kodai, Ashab Baba Road, Chagharmatti, Tehsil & District Peshawar, do hereby solemnly affirm and declare that all the contents of the accompanied **appeal** is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

DEPONENT

CNIC:17301-56624-5

CELL NO:

Identified By:

Javed Iqbal Gulbela
Advocate High Court
Peshawar.

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**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2020

Sher Alam

VERSUS

S.M.B.R through its Chairman & Others

ADDRESSES OF PARTIES

APPELLANT.

Sher Alam, Ex- Patwari, District Peshawar.

RESPONDENTS:

1. S.M.B.R through its Chairman, Peshawar
2. Commissioner, Peshawar Division Peshawar.
3. Deputy Commissioner, Peshawar Division,
Peshawar.

Dated : 24/07/2020

Appellant

Through

**JAVED IQBAL GULBELA
Advocate, High Court,
Peshawar.**



(11)

Am-A

OFFICE OF THE
DEPUTY COMMISSIONER
PESHAWAR

Dated Pesh. the 21/08/2017

OFFICE ORDER

No. 5142 /DC(P)/EA

Consequent upon the recommendations of the Inquiry Officer (Additional Deputy Commissioner Peshawar) appointed on the direction of CM Complaint & Redressal Cell received through Section Officer-I (C&RC) vide letter No.SO(C&RC)/CMS/1-28/M.Adnan/App/2193 dated 21/10/2016 on the complaint of Mr. Muhammad Adnan s/o Wali Jan r/o H.No.585 Str-314, Sector F-6, Phase-VI, Hayatabad, Peshawar, Mr. Sher Alam Patwari Halqa Mathra Peshawar is hereby placed under suspension with immediate effect for receiving Rs.4,20,000/- as Tax unlawfully, delaying in attestation of mutation for 14 months, and keeping one Kashif as Munshi against the instructions of Board of Revenue Khyber Pakhtunkhwa.

Deputy Commissioner
Peshawar

Endst: No. 5148-53 /DC(P)/DK

Copy forwarded to the:-

1. Addl. Deputy Commissioner, Peshawar.
2. Assistant Commissioner, Peshawar.
3. Accounts Officer of this office for necessary action.
4. District Kanungo, Peshawar.
5. Tehsildar, Peshawar with the direction to hand over the charge of the Halqa concerned to the contiguous Patwari till further order.
6. Official concerned (under suspension).

Deputy Commissioner
Peshawar

JAVED IQBAL Gul Bala
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0347-9405501

(12)

Am B
2



THE DEPUTY COMMISSIONER, PESHAWAR
Tel: 091-9212301-02, Fax: 091-9212303, DCPeshawar

Dated: 31-July-2019

No. 1686/DK

ORDER:

WHEREAS, Mr. Sher Alam Patwari was found suspended from service since 2018 and absent from office, proceeded under section 9 of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 by issuing a Notice vide No.1185/DK dated 19-06-2019 for making appearance in the office and explaining his position of willful absence within 15 days.

AND WHEREAS, the accused official failed to appear within the stipulated date. The accused was served upon a notice in daily newspaper through Director Information vide letter No.1353/DC(P)/DK dated 02/07/2019 for appearing within 15 days and explaining his position.

AND WHEREAS, the accused official submitted his reply on 09-07-2019, stating that he was called by different officers for personal hearing but did not finalize the case, besides he is facing thyroid cancer and obtaining treatment from Shoukat Khanam Memorial Hospital and still under treatment and requested for his re-instatement.

AND WHEREAS, the accused official was called for personal hearing on 25-07-2019 and heard in person. He could not show any approval of competent for the leave he enjoyed or any valid reason for his absence from duty.

AND WHEREAS, considering the willful absence of accused official, his reply and other circumstances, I, Muhammad Ali Asghar, Deputy Commissioner, Peshawar in the capacity as Competent Authority is of the opinion that the charges of willful absence from duty leveled against him stand proved.

NOW THEREFORE, in exercise of the powers conferred under Rule-04(1)(b)(iii) of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, a major penalty of **Removal from service** is hereby imposed upon Mr. Sher Alam, Patwari from the date of his absence and recovery of salaries thereof wrongfully drawn during the period of absence.

(MUHAMMAD ALI ASGHAR)
DEPUTY COMMISSIONER

Endst: No. and Date Even:

- (i) Commissioner, Peshawar Division, Peshawar.
- (ii) Addl. Deputy Commissioner, Peshawar.
- (iii) Assistant Commissioner, Peshawar.
- (iv) Addl. Assistant Commissioner (HQ), Peshawar.
- (v) Accounts Officer of DC office for necessary action.
- (vi) RBC, Accounts Section for necessary action.
- (vii) Tehsildar Peshawar.
- (viii) Mr. Sher Alam, Ex-Patwari.

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob. 0345-9405501

DEPUTY COMMISSIONER

(13)

Am-C

To,

The Worthy Commissioner
Peshawar Division Peshawar.
Through Deputy Commissioner Office Peshawar

Subject:

DEPARTMENTAL APPEAL AGAINST THE
IMPUGNED REMOVAL FROM SERVICE
ORDER NO: 1686/DK DATED 31/07/2019 OF
THE OFFICE OF THE DEPUTY
COMMISSIONER PESHAWAR.

Respected Sir,

With due deference & obeisance the Appellant very humbly submits, the instant departmental appeal against the impugned office order No: 1686/DK dated 31/07/2019 of the office of the Deputy Commissioner Peshawar, whereby the Appellant has been removed from service in an illegal, whimsical and cursory manner; to the following effects:-

1. That after going through the mandatorily required criteria laid down the Appellant got inducted into service as Patwari in the year 2005.
2. That Appellant was inducted into service years back, and the Appellant has always remained a dutiful, obedient, hard working &

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

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punctual Civil Servant, who never left any stone unturned in performance of his duties.

3. That it was in this back drop that abruptly the Appellant was suspended vide impugned office order No: 5147/DC (P)/EA dated 21/03/2017 of the office of the Deputy Commissioner Peshawar on miserable pretensions (Copy of the Suspension order dated 21/03/2017 is annexed herewith as annexure "A")
4. That the impugned event of suspension took place in March 2017, but the Appellant was removed from service, like bolt from the blue, vide impugned office order No: 1686/DK, dated 31/07/2019 by the Deputy Commissioner Peshawar in a classically, cursory and whimsical manner on the alleged ground of absence from duty. (Copy of impugned removal order dated 31/07/2019 is annexed as annexure "B")
5. That feeling aggrieved the Appellant preferred the instant departmental appeal for setting aside the impugned removal from service order and for his re-instatement with all back benefits, on the following grounds inter-alia:-

JAVED IQBAL Gul Bela
Qaudzar Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

GROUNDS:

- A. That no enquiry has been conducted and the Appellant was removed from service, therefore, the impugned suspension and removal from service order is unlawful, illegal void ab-initio and not sustainable in the eye of law.
- B. That even there is no inquiry dispensation order, and on this score alone the impugned order is illegal and void ab-initio.
- C. That no charge sheet of allegation was issued or served upon the Appellant, and thus the impugned orders are not sustainable at all.
- D. That even no statement of allegation was either issued or served upon the Appellant, hence, the impugned orders are illegal, unlawful, void ab-initio and are liable to be set aside.
- E. That even no show-cause notice or final show-cause notice was given to the Appellant which is mandatory obligation on the part of competent authority, therefore, the impugned orders are wrong, illegal, whimsical, unlawful, void ab-initio and not sustainable in the eye of law and on this score alone the

(16)

Appellant is entitle to be reinstated into service with all back benefits.

F. That the Appellant was never called upon by the enquiry officer or any enquiry committee to explain his position or to extend a fair chance of defense to the Appellant, and abruptly removed the Appellant from service which is illegal, unlawful and against the rights of the Appellant.

G. That Appellant is suffering from serious disease of Thyroid Cancer and got his treatment from Shoukat Khannum Memorial Cancer Hospital & Research Center Lahore and in this worst health condition and never willfully remain absent, but even then the competent authority removed the Appellant from service without any fault on the part of the Appellant, therefore, the impugned orders are illegal, unlawful, void ab-initio and against the law and the Appellant is entitle to be reinstated. (Copies of medical documents are annexed as Annexure "C")

H. That even in the impugned orders, no period of alleged absence was mentioned or pin pointed wherein the Appellant remain absent, which shows the baselessness of allegations.

JAVED IQBAL Gul Bela
Daudpota Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

- I. That even the competent authority is unaware of the law on the subject that suspension period, if not extended expressly shall automatically concludes after three months, but in the very impugned orders the competent authority writes that "the Appellant found suspended" which is not appealable to a prudent mind and shows the vacuumness and hollowness of the impugned removal order.
- J. That from every angle the impugned removal from service order is wrong, void and illegal and is liable to be set aside and the Appellant is liable to be reinstated into service with all back benefits.

It is therefore humbly prayed that on acceptance of this departmental appeal, the impugned removal order No: 1686/DK, dated 31/07/2019 may kindly be set aside and by doing so, the Appellant may kindly be reinstated into service with all back benefits.

Appellant

Sher Alam
Patwari Peshawar.
Khyber Pakhtunkhwa

Dated: 20/08/2019

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

CPT ORDER

18



Internal Medicine

ENDOCRINOLOGY-THYROID CANCER-WS

INTERNAL MEDICINE

Medical Record Number: **00000107975**
Name: **SHER ALAM**
Sex: **Male**
Age: **46 Year(s) 01 Month(s) 0 Day(s)**

Order No: **001/191048231**
Order Location: **OPD COUNTER - LHR**
Order Date: **THU 02-MAY-2019 02:50:54 PM**
Invoice No: **001190741868**

Address: **VILLAGE CHAGHAR MATI,
ASHAB BABA**
City: **Peshawar, Pakistan**
Phone #: **92 0313 9321729,92 0314
4464490,92 0315 9595585**

Patient Status: **CNoAT**
Admission No:
Ordered by: **RABAIL NAZIR**
In-house Consultant: **WAQAS SHAFIQ DR.**
Referring Physician:

Report Dest:

Appointment: **02-MAY-2019 15:30**

Medical Information/Provisional Diagnosis:

CPT Code	CPT Description	Qty	Specimen	Report Date	Request Date	Stat	Remarks
99213	OPD-REPEAT VISIT	1				No	

Discharge

Future Appointment:

JAVED IQBAL Gul Belta
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-3405501

Shaukat Khanum Memorial Cancer Hospital and Research Centre

7-A, Block R-3, M.A. Johar Town, Township P.O. Box No. 13014, Lahore, Pakistan
 Phone # +92-42-35905000, 111-155-555 FAX # 042-35945198



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Invoice

ORIGINAL

Patient Name : SHER ALAM Medical Record No. : 000-00107975
 Father/Husband Name : MUHAMMAD ZARIN Order # : 19-1048231
 Sex : Male Age : 46 Year(s) Visit # : 001190072920
 Date of Birth : 12-03-1973 NIC.#: 1730156624005 Invoice # : 001190741868
 Address : VILLAGE CHAGHAR MATI, ASHAB BABA Peshawar Invoice Date : 02-MAY-2019 02:51 PM
 Pakistan
 Phone Number : 92 0313 9321729,92 0314 4464490,92 0315 9595585

In House Doctor : WAQAS SHAFIQ DR.
 Clinic : ENDOCRINOLOGY-THYROID CANCER

S.No	Cpt Id	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Doctor Name	Bonus Status
1	99213	OPD-REPEAT VISIT	NO	1	2,000.00			2,000.00	Waqas Shafiq Dr.	

Total Amount : 2,000.00 2,000.00

Total Amount 2,000.00

Financial Support Provided 2,000.00

Running Balance Advance: 0

(NOTE: 1. This is a system generated document and does not require any signature/stamp.
 2. Reports / Refund(s) due, if any, will be processed upon production of this original document.

JAVED IQBAL Gul Bela
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob: 0345-9405501

Print date : 02-MAY-2019 02:51 PM Invoice Trn date : 02-MAY-2019 02:51 PM Object Code: S06REP0007
 Ser code : 00160000004414 Invoice Trn User : 00160000004414
 Terminal : WLSLHR1 Invoice Trn Terminal : SKM-1527 Page 1 of

Shaukat Khanum Memorial Cancer Hospital and Research Centre

7-A, Block R-3, M.A. Johar Town, Township P.O. Box No. 13014, Lahore, Pakistan
 Phone # +92-42-35905000, 111-155-555 FAX # 042-35945198

(20)



Invoice

ORIGINAL

Patient Name : SHER ALAM Medical Record No. : 000-00107975
 Father/Husband Name : MUHAMMAD ZARIN Order # : 17-2370022
 Sex : Male Age : 44 Year(s) Invoice # : 001171783351
 Date of Birth : 12-03-1973 NIC.#: 1730156624005 Invoice Date : 15-NOV-2017 11:35 AM
 Address : VILLAGE CHAGHAR MATI, ASHAB BABA Peshawar
 Pakistan
 Phone Number : 92 0313 9321729,92 0314 4464490,92 0315 9595585
 In-House Doctor : WAQAS SHAFIQ DR.
 Clinic : THYROID CANCER-WS

S.No	Cpt Id	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Doctor Name	Bonus/Status
2	83070	Thyroid Cancer Surveillance Panel (Thyroglobulin, Anti-Thyroglobulin, TSH)	NO	1	2,750.00			2,750.00	WAQAS SHAFIQ DR.	
Total Amount :								2,750.00		

Total Amount : 2,750.00
 Financial Support Provided : 2,750.00

Running Balance Advance: 0

JAVED IQBAL Gul Bela
 Daudzai Law Chamber
 Advocate High Court Peshawar
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NTN: 22-11-0786785

Sales Tax Reg. No. : 03-92-9999-304-1

Print date : 15-NOV-2017 11:35 AM Invoice Trn date : 15-NOV-2017 11:35 AM Object Code: S06REP
 User code : 0016000009139 Invoice Trn User : 0016000009139
 Terminal : WLSLHR2 Invoice Trn Terminal : SKM-1472 Page

Shaukat Khanum Memorial Cancer Hospital and Research Centre

-A, Block R-3, M.A. Johar Town, Township P.O. Box No. 13014, Lahore, Pakistan
Phone # +92-42-35905000, 111-155-555 FAX # 042-35945198



Shaukat Khanum Memorial Cancer Hospital and Research Centre
Plot # 5-B, Sector A-2, Office Enclave, Phase Hayatabad Peshawar
Phone # +92 91 5885000 FAX # +92 91 5823 www.shaukatkhanum.org.pk

(21)

Invoice

ORIGINAL

Patient Name :	SHER ALAM	Medical Record No. :	000-00107975
Father/Husband Name :	MUHAMMAD ZARIN	Order # :	17-0938379
Sex :	Male	Age :	44 Year(s)
Date of Birth :	12-03-1973	NIC.# :	1730156624005
Address :	VILLAGE CHAGHAR MATI, ASHAB BABA Peshawar Pakistan	Invoice # :	006170259109
Phone Number :	92 0313 9321729, 92 0315 9595585	Invoice Date :	24-OCT-2017 11:44 AM
		In House Doctor :	AHMED IMRAN SIDDIQI DR.
		Clinic :	THYROID CANCER-AIS

S.No	Cpt Id	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Report Date	Doctor Name	Bonus/Status
1	83070	Thyroid Cancer Surveillance Panel (Thyroglobulin, Anti-Thyroglobulin, TSH)	NO	1	2,750.00			2,750.00	05-05-2017 06:00 PM	AHMED IMRAN SIDDIQI DR.	
Total Amount					2,750.00			2,750.00			

Total Amount : 2,750.00
Financial Support Provided : 2,750.00

شکوہت قائم ہے اسری

Running Balance Advance: 0

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

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NTN : 22 - 11 - 0786785

Sales Tax Reg. No. : 03 - 92 - 9999 - 304 - 6

Print date :	24-OCT-2017 11:44 AM	Invoice Trn date :	24-OCT-2017 11:44 AM	Object Code :	S06REP0
User code :	00160000003247	Invoice Trn User :	00160000003247		
Terminal :	WLSLHR2	Invoice Trn Terminal :	SKMP-0172		Page 1

Shaukat Khanum Memorial Cancer Hospital and Research Centre

7-A, Block R-3 M.A. Johar Town, Township P.O. Box No. 13014, Lahore, Pakistan
 Phone # +92-42-35905000, 111-155-555 FAX # 042-35945198



80749

22

Invoice

ORIGINAL

Patient Name : SHER ALAM	Medical Record No. : 000-00107975
Father/Husband Name : MUHAMMAD ZARIN	Order # : 16-0521358
Sex : Male	Invoice # : 001160434677
Age : 43 Year(s)	Invoice Date : 18-MAR-2016 03:13 PM
Date of Birth : 12-03-1973	
N.I.C. No. : 1730156624005	
Address : VILLAGE CHAGHAR MATI, ASHAB BABA Peshawar Pakistan	In. House Doctor : WAQAS SHAFIQ DR.
Phone Number : 92 0313 9321729,92 0315 9595585	Clinic : THYROID CANCER-WS

S.No	Cpt Id	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Doctor Name	Bonus/Status
General										
1	99203	OPD-FIRST VISIT	NO	1	2,000.00				WAQAS SHAFIQ DR.	
Total Amount :					2,000.00					

Total Amount : 2,000.00
 Financial Support Provided : 2,000.00

Ali

Less

T/U - 6 months

M. S. Khan

JAVED IQBAL Gul Bela
 Daudzar Law Chamber
 Advocate High Court Peshawar
 Phone: 0345-9405501

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NTN: 22-11-0786785 Sales Tax Reg. No.: 03-92-9999-304-64
 Print date: 18-MAR-2016 03:13 PM Invoice Trn date: 18-MAR-2016 03:13 PM Object Code: S06REP00078
 User code: 00160000004767 Invoice Trn User: 00160000004767
 Terminal: WLSW Invoice Trn Terminal: SKM-I534 Page 1 of 1

23

000-00107975
SHER ALAM



Shaikat Khanum Memorial Cancer Hospital and Research Centre
7-A Block R-3, Johar Town, Lahore, Pakistan Tele: +92-42-35905000, 111-155-555
Email: Web: www.shaikalkhanum.org.pk

JAVED IQBAL Gul Bela
Dayazai Law Chamber
Advocate High Court Peshawar
mob: 0345-9405501

(24)

وکالت نامہ

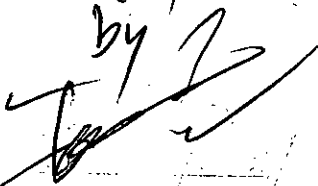
بعدالت: Service Tribunal ^{K.P.K}
شہر عالم بنام S.M.B.R ^{S. A}
مخانب Appellant دعویٰ یا جرم
تھانہ ایف آئی آر تاریخ

باعث تحریر آنکہ مقدمہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی و جوابدہی بمقام سے جاوید اقبال گل بیلہ ایڈووکیٹ ہائی کورٹ کو بدیں شرط وکیل مقرر کیا ہے۔ کہ میں ہر پیشی کا خود یا بزرگیہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظهر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کی کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے۔ اگر مقدمہ علاوہ صدر مقام پکھری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کوکل ساختہ پر داختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپروائشی و راضی نامہ فیصلہ برخلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کطرفہ درخواست حکم امتناعی یا قرقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا ایئر سٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں اور ایسے شیر قانون کے ہر امر وہی اور ویسے ہی اختیارات حاصل ہونگے جیسے کے صاحب موصوف کو حاصل ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا کہ سند رہے۔ مورخہ 24-07-2020۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Attended

Accepted

by



مقدمہ
مختار نامہ