

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_/2023

In Service Appeal No. 1610/2023

**Muhammad Zeeshan**

**VERSUS**

**IGP , ETC.**

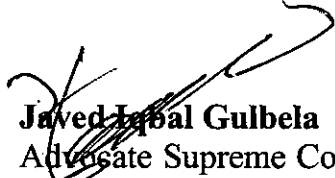
**I N D E X**

<b>S NO.</b>	<b>DESCRIPTION OF DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1.	Grounds of Application		1
2.	Affidavit		2
3.	Documents	"A"	3-9

**Dated: 04-10-2023**

  
**Appellant**

*Through*

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

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_\_/2023

In Service Appeal No. 1610/2022

**Muhammad Zeeshan**

**VERSUS**

**IGP and Others.**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 8078

Dated 4/10/23

**Application for Placing on File Additional Documents**

*Respectfully Sheweth,*

1. That the Appellant had earlier filed a Service Appeal No. 1610/2023, which is pending adjudication before this Hon,ble Service Tribunal and is fixed for arguments on 02/11/2023.
2. That the Petitioner had been wanted to place on file the hereby annexed documents. (Copies of Documents are annexed as annexure "A").
3. That for the ends of justice the above mentioned document must be placed on file and be read as part and parcel of the original case.
4. That there is no legal hedge in allowing the same.

*It is therefore most humbly prayed that on acceptance of the instant application, the appellant be granted permission to place on file the additional documents.*

*Dated: 04/10/2023*

*Ali*  
Appellant

*Rizq*  
Javed Jabal Gulbela  
Advocate, Supreme Court  
Pakistan.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_/2023

In Service Appeal No. 1610/2022

**Muhammad Zeeshan**

VERSUS

**IGP and Others.**

**AFFIDAVIT**

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



Deponent

CNIC. 17101-5699200-1

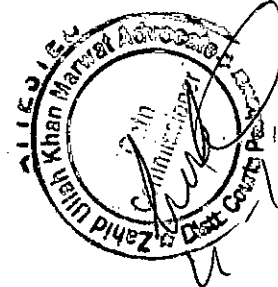
0318-4667200

Identified by:

  
Mr. Jayed Iqbal Gulbela

Advocate Supreme Court,

Pakistan



# Kidney Care Center



Prof. Dr. Isa Khan  
M.B.B.S., (Sind), M.S. (Pb), D.U. (Vien)  
UROLOGIST  
DIR MEDICAL TOWER  
Opp Turaqi Masjid  
Hospital Road, Peshawar

U/L

U/L 9  
34yrs

Date: 26/11/12  
L.V. 28/12/11

BP: 120/80

on L.V. 1000

H/O R.T.A → # Pelvis  
+ Retention of urine  
w/son's pelvic scan } 2 1/2 months

Change Cath.

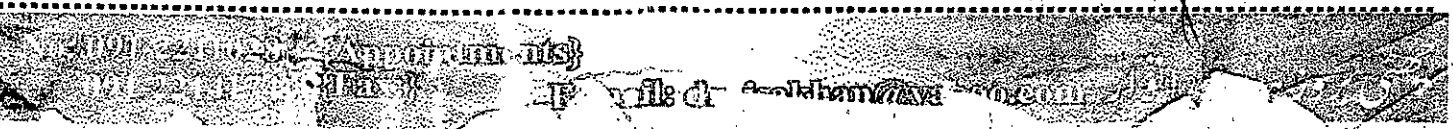
R.R.C done  
Catheter retained for 3 wks  
x 3 months.

For F.U.

① Pel. Negram  
U/L 2 + 2 + 2



Handwritten notes and scribbles at the bottom right of the page.



# Kidney Care Center

(4)



**Prof. Dr. Isa Khan**  
M.B.B.S., (Sind), M.S. (Pb), D.U. (Vienna)  
UROLOGIST  
DIR MEDICAL TOWER  
Opp Turaqul Masjid  
Hospital Road, Peshawar

BP: 120/80

2/16

Urine 9  
3145

Date: 2/7/12

L.V. 28/3/12

K/c

R.R.C. done in K.C.C.  
on 28/12/11

Catheter was retained  
for 3 wks x 3 months.

on L.V. was again  
developed structure with stone

100 done on 29/3/12.  
Catheter retained for  
3 wks. x 3 wks.

For F.U.

Remove cath  
&

follow up

delatation

ARIGEM 320 - 7

Ph. No: 091-2214123 (Appointments)

091-2214174 (Fax)

E-mail: dr\_isakhan@yahoo.com

پیشوا ہسپتال اورال ٹاور

Date 31/7/12

op: 10u done under G.A

Call Reston for 15 days

after change

(5)

18

18/07/12

ڈاکٹر میاں نوشاد علی کا کاخیل

ایف آئی ایس (آئر لائنز) ایف آئی ایس (ایئر برا)  
ایف سی پی ایس - یورالوجی (پاک) ڈیپارٹمنٹ یورالوجی (لندن)

کنسلٹنٹ یورالوجسٹ

نارتھ ویسٹ جنرل ہسپتال بکسر A-3 فز 5 حیات آباد

فون: 091-5822612-21 فیکس: 091-5822620

Email: miannaushad@gmail.com

Date: 11/7/12

Northwest General  
Hospital & Research Centre

RFA

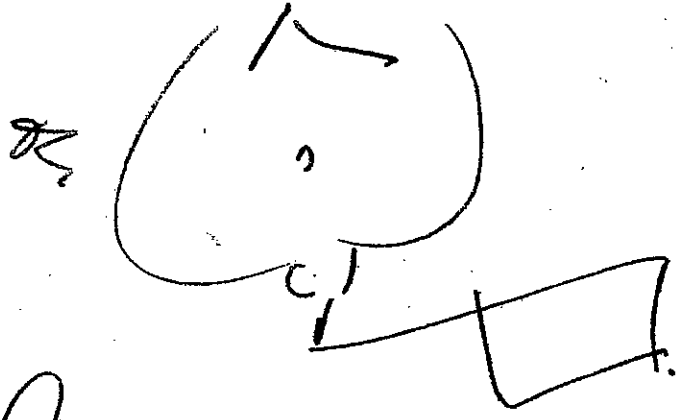
# felis

Reproductive  
leveling

→ Str. Chordae  
valvulae

Operated by Dr. IFA Khan  
Optical brooms x 3

to see Retraction



Ch

Urterogram

ماہ بعد معائنہ کیلئے تشریف لائیں۔

A project of ALLIANCE HEALTHCARE (Pvt) Ltd.

JAVED I. NIJPELA  
Surgeon  
11/7/12



Northwest General  
Hospital & Research Centre

RTA fracture pelvis

rupture urethra → stricture  
urethra.

operated by dr Isa Khan  
optical urethrotomy

C/C retention of urine.

Adv

cystoscopy & suprapubic  
cathetrization.

*[Handwritten signature]*

(6)

اکٹر میاں نوشاد علی کا کاخیل

ف آری ایس (آئر لینڈ) ایف آری ایس (ایڈمبرا)  
ف سی پی ایس - یورالوجی (پاک) ڈیپلومسان یورالوجی (لندن)

کنسلٹنٹ یورالوجسٹ

آرٹھرویسٹ جنرل ہسپتال سیکٹر A-3 فز 5 حیات آباد

فون: 091-5822612-21 فیکس: 091-5822620

Email: miannaushad@gmail.com

Date: 27/07/12

ماہر معائنے کیلئے تشریف لائیں۔

A project of ALLIANCE HEALTHCARE (Pvt) Ltd.

JAVEDICHAUL GULBELA  
Advocate  
Supreme Court of Pakistan  
4250 83471



Surgeon

Dr. Hazrat Ali

MBBS (Pesh)  
MCPS (Pak)  
FCPS (Surgery)

Consultant General Surgeon / Urologist

CLINIC:

Habib Medical Complex,  
Dabgari Garden, Peshawar.



سرجن

ڈاکٹر حضرت علی

ایم بی بی ایس - پشاور

ایم سی پی ایس - پاک

ایف سی پی ایس - سرجری

کنسلٹنٹ جنرل سرجن ایورا الوجسٹ

کلینک: حبیب میڈیکل کمپلیکس ڈبگری گارڈن پشاور

موبائل: 0301-5921863 - 0345-9170150

Name Waheda JAN Age 28 Sex F Date 08-09-201

Admit

Jw Suprapubic  
Cystostomy  
an OPD

Urethral  
Injury  
pelvic Disruption  
E screws in  
S1-2

Discharge on.

Suprapubic  
Cystostomy done  
Lower Spinal

- 1) in Loban U<sub>3</sub> 5
- 2) Tab. Floxip 16w U<sub>3</sub> 10
- 3) Tab. Rotal 50 1-11

JAVED IOZAI - M.BELA  
Advocate  
Supreme Court of Pakistan  
(M.C. 16617)

# Kidney Care Center



**Prof. Dr. Isa Khan**  
M.B.B.S., (Sind), M.S. (Pb), D.U. (Vienna)  
**UROLOGIST**  
**DIR MEDICAL TOWER**  
Opp Turaqul Masjid  
Hospital Road, Peshawar

8

on 11/3 26/11/12  
31/12

Date: 28/12/12  
1. v. 24/1/13

BP. 120/80

K/K

K.R.C. was done on

28/12/11

Catheter retained for

3 wks + 3 months

Removal Cath

observed

For F.U.

the best  
evaluation

after 2 weeks

Structure remains

Appointments: E-mail: [dr\\_isakhan@kcc.com](mailto:dr_isakhan@kcc.com)

ADVOCATE  
Advocate  
Supreme Court of Pakistan  
ISC # 2317

# Prof. Dr. Khursheed Anwar

Clinic : 2270201  
Res : 2250662

MB, FRCS, Dip. Urol (London)  
Urologist & Transplant Surgeon  
Ex. Head of Urology Department  
QPGMC, PIMS, ISLAMABAD.

Name Mr Waheed Jass Age/Sex 28 y ♂ Date: 27.5.2015

- Traumatic post. method long stricture

- Had ~~Radical~~ procedure in 2011

followed by distal urethroplasty  
& urethral dilatation x 3

- Distal urethroplasty x 2 at RGH

2013 &

Had 10/12 bank (buccal mucosa) augmented urethroplasty

- Pt. has never been able to void  
/ urethra being R7A. & n  
still a S/P catheter.

پروفیسر ڈاکٹر خورشید انور

The Margalla Clinic  
64-E, Masco Plaza,  
Blue Area, Islamabad.  
E-mail: khursheed\_anwar@hotmail.com

دی مارگلہ کلینک  
ای-64 ماسکو پلازہ، نزد جہانگیر زینت  
بلیو ایریا، اسلام آباد

INTERNATIONAL LABELA  
20000  
P.O. Box 1000  
Faisalabad  
63717