

S.No. of proceedings	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	16.05.2016	<p style="text-align: center;"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>CAMP COURT ABBOTTABAD</u> <u>APPEAL NO. 353/2015</u></p> <p style="text-align: center;"><u>Azra Versus Government of Khyber Pakhtunkhwa through the Secretary</u> <u>E&SE, Peshawar and others.</u></p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:</u></p> <p>Counsel for the appellant and Mr. Zahid Gul, ADO alongwith Mr. Muhammad Siddique, Senior Government Pleader for respondents present.</p> <p>2. Mst. Azra D/O Abdul Khaliq hereinafter referred to as the appellant has preferred the instant appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 12.12.2014 vide which Mst. Shazia Bano (private respondent No.4) was adjusted at Govt. Girls Middle School, Maira Muzaffar Abbottabad and appellant ignored despite serving since 13.03.2004 at Government Girls Middle School Riyala Abbottabad.</p> <p>3. During the course of arguments learned counsel for the appellant as well as learned Sr.GP agreed that the appellant is to be adjusted against the nearest station at the first available vacancy acceptable to the appellant.</p> <p>4. In the light of the above, the appeal is disposed of with the directions to the respondents-department that the appellant be transferred/adjusted at</p>

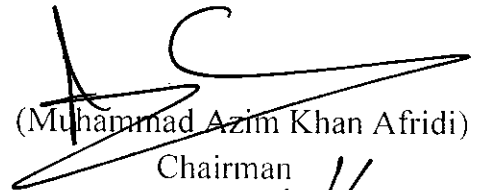
Handwritten signature and date:
16.05.16

the nearest station at the moment a vacancy suitable to the appellant accrues.

Parties are left to bear their own costs. File be consigned to the record room.



(Abdul Latif)
Member



(Muhammad Azim Khan Afridi)
Chairman
Camp Court A/Abad.
16.05.16

ANNOUNCED

16.05.2016

19.08.2015

Counsel for the appellant, Mr. Zahid Gul, ADO alongwith Mr. Muhammad Tahir Aurangzeb, GP for official respondents No. 1 to 3 and Ayaz Ahmad on behalf of private respondent No. 4 present. Requested for adjournment. Adjourned to 16.11.2015 for written reply/comments before S.B at camp court A/Abad.


Chairman
Camp Court Abbottabad

16.11.2015

Counsel for the appellant, Mr. Zahid Gul, ADO alongwith Mr. Muhammad Siddique, Sr.G.P for official respondents No.1 to 3 and Mr. Ayaz Ahmad on behalf of private respondent No.4 present. Comments submitted. The appeal is assigned to D.B for rejoinder and final hearing for 16.5.2016 at Camp Court A/Abad.


Chairman
Camp Court A/Abad.

18.5.2015

Agent of counsel for the appellant present. Seeks adjournment. Adjourned for preliminary hearing to 15.6.2015 at Camp Court A/Abad.



Chairman

Camp Court A/Abad

15.6.2015
Mst. Azra

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as D.M in BPS-15 at GGMS Riyala for the last 11 years. That the said school is situated at a distance of 70 k.m from the abode of appellant. That a vacancy near the house of appellant approved in GGMS Maira Muzaffar and the appellant was entitled to be posted against the same but vide impugned order dated 12.12.2014 private respondent No.4, Shazai Bano, was appointed against the said post despite the fact that she was having no preferential right vis-à-vis the status of the appellant. That the appellant preferred departmental appeal on 17.12.2014 which was not responded and hence the instant service appeal on 22.4.2015.

That the appellant is entitled to be posted against the post of D.M at GGMS Maira Muzaffar in preference to private respondent No.4.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 19.8.2015 before S.B at camp court A/Abad.


Chairman
Camp Court A/Abad

Appellant Deposited
Security & Process Fee





Form- A

FORM OF ORDER SHEET

Court of _____


Case No. 353/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	22.04.2015	<p>The appeal of Mst. Azra resubmitted today by Mr. Muhammad Shoaib Gul Jadoon Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	22-4-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>18-5-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Azra D/o Abdul Khaliq DM Female GGMS Riyala Abbottabad received to-day i.e. on 03.04.2015 which is returned to the counsel for the appellant with the direction to submit Six more copies of the appeal alongwith annexures i.e. complete in all respect, with in 15 days.

No. 455/S.T,

Dt. 7/4/2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Shoaib Gul Jadoon
Adv. High Court Abbottabad

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

Service Appeal No. 353 /2015

Azra D/a Abdul Khaliq DM female GGMS Riyala Abbottabad
R/O Jhangi Khoja Mandian Abbottabad

..... Appellant

VERSUS

Government of Khyber Pakhtunkhwa

...RESPONDENTS

SERVICE APPEAL

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Azra
... APPELLANT

Through:

Dated: 01/04/2015

M. Shoaib Gul Jadoon
(Muhammad Shoaib Gul Jadoon)
Advocate High Court Abbottabad

BEFORE THE KHYBER PAKTHUNKHAWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 353 /2015

Azra D/a Abdul Khaliq DM female GGMS Riyala Abbottabad
R/O Jhangi Khoja Mandian Abbottabad

A.W.F. Province
Service Tribunal
Diary No. 300
dated 3/4/2015

...Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa Through the Secretary Elementary and Secondary Education Department Peshawar .
2. Directorate of Elementary and Secondary Education Department Peshawar Through Director .
3. District Education Officer Female Abbottabad
4. Shazai Bano DM Female BPS 15 Presently Posted at GGMS Maira Muzaffar Abbottabad

...RESPONDENTS

APPEAL UNDSER SECTION 4 OF THE NEFP

SERVICE TRIBUNAL ACT 1974 AGAINST

OFFICE ORDER DATED 12/12/2014 BEARING NO. 8693-96 WHEREBY THE RESPONDENT NO. 4 HAS BEEN POSTED BY RESPONDENT NO. 3 AS AN ADJUSTMENT TO NEWLY UPGRADED GGMS MAIRA MUZAFFAR ABBOTTABD ON POLITICAL BASIS AND APPELLANT HAS BEN IGNORED

re-submitted to-
and filed.

Registrar

22/4/15

DESPITE OF THE FACT THAT APPELLANT HAS BEEN POSTED FOR LAST ABOUT 11 YEARS AT FAR FROM STATION GGMS RIYALA AND THE IMPUGNED ORDER IN RESPECT OF RESPONDENT NO. 4 IS PREMATURE , ILLEGAL , AGAINST THE LAW AND TRANSFER POLICY OF THE GOVERNMENT OF KHYBERPAKHTUNKHWA ,UPON POLITICAL BASIS AND HIGH HANDEDNESS OF THE RESPONDENTS.

Respectfully Sheweth:-

1. That the appellant has been inducted in the year 2003 as DM (Female) vide order No. 7158-7207 dated 15/11/2003 .The applicant firstly posted at GG Middle School Leeran vide orders issued EDO Abbottabad and vide order 13/03/2004.

Copy of order is annexed as A

2. That the appellant was firstly posted at GGMS Leeran Abbottabad and later on an adjustment was made and applicant was transferred /posted to GGMS Riyala Abbottabad and since then the applicant is posted there.

Copy of letter is annexed as B

3. That the applicant is resident of Jhangi Khoja Abbottabad and post at far away station approximately 70 Km journey daily. That the applicant has completed his tenure of posting since more than 7 years ago . That applicant variously applied for transfer to some other station preferably near to home /residence but in vain. That on 08-05-2014 the applicant came to know that GGMS Maira Muzaffar a newly upgraded school had a

vacant post of DM and applicant submitted written application .

Copy of application is annexed as C

4. That the applicant was fit and entitled to be adjusted/transferred to GGMS Maira Muzaffar but instead of that vide order 12/12/2014 Shazia Bano DM female was adjusted while the applicant has been ignored despite of the fact above said DM female had not completed her tenure of posting at GGMS Karrach and within 8 month she has been again transferred /posted again which is against law policy and service conditions.

Copy of Impugned order is annexed as D

and earlier order as E

5. The appellant filed departmental appeal on 17-12-2014 through courier but despite of the elapse of 90 days that has not been decided by the department yet

Copy of Appeal is annexed as E

and Courier Receipt as E/I

Since the applicant is aggrieved from above said posting order and is entitled and deserving the post above said as such as proffering the instant appeal on following grounds

GROUND:

a).That the impugned order has been passed by Respondent no. 3 in hasty manner and being unlawful, illegal against the facts is not maintainable in the eyes of law.

b)That the impugned order is malafide , discriminatory and against the public as well as government policy , hence liable to be set aside .

c)That the learned Respondent no. 3 has by-passed policy of government and the precedents laid

down by superior courts and thus on this sole ground the impugned order is not sustainable.

d)That , impugned order is against the tenure policy of the government and is in violation of principle of natural justice .

e)That the impugned order has been passed tentatively/ surfacely without going through and compliance of law .

f)That operation of impugned order caused serious miscarriage of justice and irreparable loss to the appellant and from none angle is sustainable and thus liable to be set aside being against the norms and principles of law.

g)That despite of the fact that appellant has served more than tenure at far from station and was entitled to be transferred to the above said being senior One but the Respondent No. 3 posted/transferred Respondent No 4 who was junior to the appellant and further 8 month prior to impugned transfer the Respondent no. 4 was transferred to GGMS Karaach on mutual basis and tenure of posting was not completed. Thus the impugned transfer order was pre-mature illegal , void , without lawful authority , arbitrary , preserve , and smacks of favoritism , nepotism, result of illegal excercise of power and has been issued under the political influence.

h)That the instant appeal has been filed within time.

i)that counsel for applicant craves leave to add/ argue/ leave any grounds with the kind permission of this Honourable Court at the time of arguments.


It is, therefore, humbly prayed that on acceptance of instant petition, Honourable Tribunal may be pleased to order To Respondent No 3 to withdraw impugned order /set aside the impugned order cancel the posting/transferred of Respondent No 3 and appellant be allowed to be .posted/transferred at GGMS Maira Muzaffar .

Prayed accordingly in the interest of justice .


... APPELLANT

Through:

Dated; 01/04/2015


(Muhammad Shoaib Gul Jadoon)
Advocate High Court Abbottabad

VERIFICATION;

Verified that the contents of the foregoing petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.


PETITIONER

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL
, PESHAWAR

Service Appeal No. _____ /2015

Azra D/a Abdul Khaliq DM female GGMS Riyala Abbottabad
R/O Jhangi Khoja Mandian Abbottabad
..... Appellant

VERSUS

Government of Khyber Pakhtunkhwa & Ors ...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Muhammad Shoaib Gul Jadoon, Advocate , do hereby declare on that the contents of service appeal are true and correct as per information furnished conveyed by me client and nothing has been concealed from this Honourable Tribunal.

Date. 01/04/2015



Muhammad Shoaib Gul Jadoon
DEPONENT

Advocate High Court Abbottabad

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL
, PESHAWAR

Service Appeal No. _____/2015

Azra D/a Abdul Khaliq DM female GGMS Riyala Abbottabad
 R/O Jhangi Khoja Mandian Abbottabad
 Appellant

VERSUS

Government of Khyber Pakhtunkhwa & Ors ...RESPONDENTS

SERVICE APPEAL

CERTIFICATE

Certified that no such Service appeal is pending or filed prior to
 this before this Hon'ble Tribunal.

Azra
APPELLANT

Through

Date. 01/04/2015

M. Shoaib Gul Jadoon
Muhammad Shoaib Gul Jadoon
 Advocate High Court Abbottabad

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. /2015

SERVICE APPEAL

ADDRESSES OF THE PARTIES

APPELLANT

Azra D/a Abdul Khaliq DM female GGMS Riyala Abbottabad
 R/O Jhangi Khoja Mandian Abbottabad

RESPONDENTS .

1. Government of Khyber Pakhtunkhwa Through the Secretary Elementary and Secondary Education Department Peshawar .
2. Directorate of Elementary and Secondary Education Department Peshawar Through Director .
3. District Education Officer Female Abbottabad
4. Shazai Bano DM Female BPS 15 Presently Posted at GGMS
 Maira Muzaffar Abbottabad

Azra
APPELLANT

Through

Date. 01/03/2015

M Shoaib Gul Jadoon
Muhammad Shoaib Gul Jadoon
 Advocate High Court Abbottabad

9

Amended "A"

OFFICE OF THE DISTRICT COORDINATION OFFICER ABBOTTABAD.

ORDER

The District Government Abbottabad is pleased to appoint the following DM (Female) in BPS-09 on Contract Basis, (Rs.2410-145-6760) plus usual allowances as admissible under the rules for a period of Two years and posted in the schools as noted against each with effect from the date of taking over charge subject to terms and conditions mentioned below. The order bearing No.7158-7207 dated 15/11/2003 issued by Executive District Officer Education Abbottabad to this effect stands withdrawn

(OPEN MERIT) FEMALE DM.

Table with 7 columns: S/NO, MERIT, NAME OF CANDIDATES, FATHER'S NAME, ADDRESS, PLACE OF POSTING, REMARKS. Rows include candidates like NIGHAT ASHI, SYEDA SHAISTA, SOBIA ABDUL KHALIQ, etc.

SESSION WISE/BATCH WISE MERIT FEMALE DM.

Table with 7 columns: S/NO, SESSION, NAME OF CANDIDATES, FATHER'S NAME, ADDRESS, PLACE OF POSTING, REMARKS. Rows include candidates like SHAGUFTA BIBI, ZARQA ISHAQ, MAHJABEEN, etc., with session numbers ranging from 1993 to 2000.

11

10

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY ABBOTTABAD.

ADJUSTMENT :-

Annexure "B"

Mst: Azra (DM) Govt: Girls Middle School Leeran is hereby adjusted at Govt: Girls Middle School Riyala (Meman Abad) against vacant DM post on her own pay and BPS in the interest of public service with effect from the date of her taking over charge.

Note :-

- 01 :- No TA/DA & TG is allowed.
- 02 :- Charge report (in duplicate) should be sent to all concerned.

sd
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LIT: ABBOTTABAD.

Endst No 5242-46 /DM(F)

Dated Abbottabad the 13/3/2004.

Copy to the :-

- 01:- The District Co-ordination Officer Abbottabad.
- 02:- The District Account Office Abbottabad.
- 03:- The Account Branch Local Office.
- 04:- The Headmistress GGMS Leeran / Riyala.
- 05:- Office order File.

sd
13/3/04
DISTRICT OFFICER
SCHOOLS & LIT: ABBOTTABAD.

11

Annexure C₃

To,

The District Education Officer,
(Female) Abbottabad.

Subject: Request for Transfer From Govt. Girls Middle School Reyala Momenabad to Govt. Girls Middle School Maira Muzaffar

Dear Madam,

It is stated that I am serving as a drawing mistress (DM) at Govt. Girls Middle School Reyala Momenabad, since December 2003. My stay in the school is of more than ten years now. I am a resident of Jhangi Khoja, Mandian Abbottabad. The school I teach is at a distance of more than 70 km from the place of my residence. I cannot return home daily due to non availability of transport and the heavy cost of transportation charges. Moreover, my parents are also aged and require extra care and I am the one looking after them in the home.

Through some reliable sources I have come to know that the post of DM is created at the newly upgraded Middle School in the village of Maira Muzaffar. As my stay in the subject school has been of more than ten years now, so you are requested to kindly post me at Middle School Maira Muzaffar near to my residence keeping in view my personal problems.

Thanking you in anticipation.

DEO (F) Abbottabad
For vacant post in subject school
of ban under the rules/policy

[Signature]
Private Secretary to Minister for
Elementary & Secondary Education
Khyber Pakhtunkhwa
18/6
Azra
28/5/14

Yours Sincerely,
Azra
Drawing Mistress,
Govt. Girls Middle School
Reyala Momenabad.

[Signature]
[Signature]

MUSHTAQ AHMAD GHAM
Minister For Higher Education
Khyber Pakhtunkhwa

(12)

Ammeuse D 22


OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

ADJUSTMENT:

Mst Shazia Bano DM BPS 15 GGMS Karrach is hereby adjusted at GGMS Maira Muzaffar Atd against the vacant post on her own pay & grade in the interest of public service with effect from the date of her taking over charge.

Note:

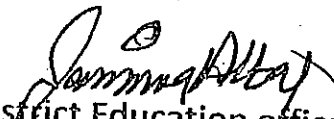
1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.


 District Education officer
 Female Abbottabad

Endst No 8693-96 /Adjustment/DM dated A.Abad the 12/12 014

Copy to the:-

1. District Account Officer Abbottabad.
2. H/M GGMS Maira Muzaffar and GGMS Karach Atd.
3. Budget & Accounts Officer Local Officer.
4. Official concerned.


 District Education officer
 Female Abbottabad

2000	NAHEED AKHTER	AKHTER HUSSAIN	N/SHER	GGMS TAKIA HALL.	-do-
					-do-

(13)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

TRANSFER/ADJUSTMENT.

Annexure E

The following transfer/adjustment of DM teachers BPS-15 are hereby ordered in their own pay & scale in the school noted against each in the interest of public service from the date of taking over charge.

S/N	NAME OF TEACHER	FROM.	TO	REMARKS
1.	Rukhsana shaheen, DM BPS-15	GGMS Karach..	GGMS Dheri Maira.	Vice Sr:No.2
2	Shazia Bano, DM BPS-15	GGMS.Dheri Mairaira.On (Tenure) basis W.e.from 30/11/2008	GGMS Karach.	Vice Sr:No.1

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

Sd/---
**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

Endstt: No. 1282-88 /EB-II /Adj: (F/S)/

Dated A/Abad the 7/4 /2014.

Copy to the:-

1. The District Accounts Officer Abbottabad.
2. The H/M GGMS Dheri Maira Abbottabad.
3. The H/M GGMS Karach, Abbottabad.
4. Budget & Account Officer Local Office.
5. K.P.O Local Office.
6. Teacher concerned.

[Signature]
**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

14

To

The Director Elementary And Secondary Education
Khyber Pakthun Khawa Peshawar .

Sub = Appeal against posting order dated 12-12-2014

Respected Sir ;

With due respect it is submitted that the applicant has been inducted in the year 2003 as DM (Female) vide order No. 7158-7207 dated 15/11/2003 .The applicant firstly posted at GG Middle School leeran vide orders issues EDO Abbottabd and vide order 13/03/2004 an adjustment was made and applicant was transferred /posted to GGMS Riyala Abbottabad and since then the applicant is posted there. That the applicant is resident of Jhangi Khoja Abbottabad and post at far away station approximately 70 Km journey daily. That the applicant has completed his tenure of posting since more than 7 years ago . That applicant variously applied for transfer to some other station preferably near to home /residence but in vain. That on 08-05-2014 the applicant came to know that GGMS Maira Muzaffar a newly upgraded school had a vacant post of DM and applicant submitted written application .

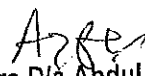
That the applicant was fit and qualified to be adjusted and entitled to be transferred to GGMS Maira Muzaffar but instead of that vide order 12/12/2014 Shazia Bano DM female was adjusted while the applicant has been ignored despite of the fact above said DM female had not completed her tenure of posting at GGMS Karrach and within 8 month she has been again transferred /posted again which is against law policy and service conditions.

Since the applicant is aggrieved from above said posting order and is entitled and deserving the post above said as such as proffering the instant appeal with prayer that above said transfer order date 12-12-2014 may kindly be set aside and applicant be posted at GGMS Maira Muzaffar .

Prayer is made accordingly

Abbottabad

Date. 17/12/2014


Azra D/a Abdul Khaliq

DM female GGMS Riyala Abbottabad

R/O Jhangi Khoja Mandian Abbottabad

Cell No. 0314-4004753

15

وکالت نامہ

بعدالت جناب _____
سروس ٹریڈنگ کمپنی خیرپور خٹکواہ پشاور
عنوان: _____ نام: _____
مخانب: _____
نوعیت مقدمہ: _____
علت نمبر: _____
تھانہ _____ زیر دفعہ _____

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی اہماری طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام _____

کیلیئے محمد شعیب گل جدون ایڈووکیٹ ہائی کورٹ و سید توصیف الحسن شاہ ایڈووکیٹ کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے اقبال دعویٰ اور بصورت دیگر ذگری کرانے اجراء وصولی چیک روپیہ عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کیلیئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور ان کا ساختہ برداشتہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختیار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بے سبب مفلسی کے دائرہ کرنے اور اسکی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

العبد _____ Azhar _____ العبد _____

المرقوم ۱ اپریل ۲۰۱۵ء بمقام _____ منظور کیا گیا۔

M. Shauq

سید توصیف الحسن شاہ ایڈووکیٹ

محمد شعیب گل جدون ایڈووکیٹ ہائی کورٹ

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 353/2015

Azra D/o Abdul Khaliq DM (female) GGMS Riyala Abbottabad

VS

Govt: of KPK, Peshawar & others

RESPECTFULLY SHEWETH:-

Written Reply on behalf of Respondent No.4

PRELIMINARY OBJECTIONS:-

1. That the appellant has no cause of action/ locus standi to file the present appeal.
2. That the appellant is estopped to sue through his own conduct.
3. That the appellant did not come to this Hon'ble Court with clean hands.
4. That the appellant has concealed distorted facts from this Hon'ble Tribunal, hence his appeal is liable to be dismissed on score alone.
5. That the instant appeal has been filed to pressurize the respondent department.
6. That the instant appeal is not maintainable in its present form.
7. That every civil servant is bound to serve anywhere in the District/ Province in the interest of public service.
8. That the instant appeal is not maintainable because no order has been passed against the appellant.

FACTUAL OBJECTIONS:-

1. In reply to Para No.1, it is submitted that it pertains to the records.
2. In reply to Para No.2, it is submitted that it pertains to the records.
3. In reply to Para No.3, it is submitted that it pertains to the records, moreover, appellant is bound to serve anywhere in the best interest of public service. The reference of application given by the appellant in her appeal as annexure "C" is duly recommended by the Private Secretary to Minister for Elementary & Secondary Education KPK, Peshawar & Mushtaq Ahmed Ghani Minister for Higher Education KPK, Peshawar/Local MPA PK-44 as well. Through said application the appellant try to influence the Respondents by putting the political influence at the respondents, which is totally violation of the Judgments of the Hon'ble Supreme Court of Pakistan under 2007 SCMR, 599 & 2005 SCMR, 17.
4. In reply to Para No.4 it is submitted that the Para No.4 is incorrect because the respondent No.4 was transferred under the KPK posting/transfer's Spouse Police.
5. In reply to Para No.5 it is submitted that it pertains to the records. The appellant

was not aggrieved by the order dated 12.12.2014 because no order was passed against the appellant.

GROUND

1. That Para (a) is not related with the respondent No.4
2. That Para (b) is incorrect because the said transfer is lawful as per policy of the Govt: of KPK and has been passed in the best interest of public service.
3. That the Para (c) is incorrect because it has no concern with me.
4. That the Para (d) is also incorrect, because comprehensive reply has been given in the above preliminary & Factual objections.
5. That the Para No. (e) is incorrect and I denied it, because the transfer order was according to the Policy and under merit.
6. That Para (f) is incorrect, because the transfer order issued under law.
7. That Para (g) is also incorrect and deniable because the appellant/any Govt servant is bound to serve anywhere and could not use his own choice in this regard according to the section 10 of the constitution 1973 of Pakistan
8. In reply to Para No.1, it is submitted that it pertains to the records.

It is therefore very humbly prayed that in the light of foregoing reply, the appeal of the appellant may graciously be dismissed with cost throughout.

Dated: 16/11/2015

Shazia Bano
Shazia Bano (DM)
GGMS, Maira Mazafar,
District, Abbottabad
.....Respondent No.4

AFFIDAVIT

I, Mrs. Shazia Bano respondent No.4 /(DM) GGMS Maira Mazafar, District Abbottabad, do hereby affirm and declare that the contents of foregoing reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Dated: 16/11/2015

Shazia Bano
Shazia Bano (DM)
GGMS, Maira Mazafar,
District, Abbottabad
.....Respondent No.4

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR, CAMP COURT ABBOTTABAD.

Appeal No. 353 /2015

MST AZRA

Appellant

VS

GOVERNMENT OF K. P. K THROUGH SECRETARY (E & SE)
DEPTT: PESHAWAR & OTHERS (Respondents)

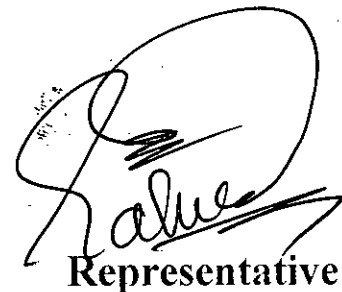
Respondents

WRIT PETITION INDEX

S. No.	Description	Annexure	Page No
1.	Para Wise Comments/reply & Affidavit		0-4
2.	Annexures	"A"	5-29
3.		"B"	NIL

....Respondents

Through


Representative

Dated: 30-08-2015

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

Appeal No. 353 /2015

MST AZRA (Appellant)

VS

GOVERNMENT OF K. P. K THROUGH SECRETARY (E & SE)

DEPTT: PESHAWAR & OTHERS (Respondents)

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS 1 to 3

Respectfully Sheweth:

Para wise comments on behalf of the respondents no 1 to 3 are as under;

PRELIMINARY OBJECTIONS:

1. That the appellant has no locus standi to file the instant appeal.
2. That the appellant is estopped to agitate the instant matter before this Honorable Tribunal.
3. That the transfer was made on merit.
4. That the appellant has not come to this Honourable Tribunal with clean hands.
5. That the appellant has filed instant appeal with malafide intention for wrongful gain and suppressing the original facts, hence, the appeal is liable to be dismissed.
6. That the appellant concealed the facts.
7. That the transfer of the respondent No 4 was made on medical ground.

FACTURAL OBJENTIONS:

1. Para No.1 is correct. No comments.
2. Para No.2 is correct. Appellant was transferred in GGMS Riyala Abbottabad, and already serving at GGMS Riyla, appellant would be adjusted of the availability of the DM post at nearest.
3. Reply of this Para is that the appellant firstly appointed at GGMS Leerain and then appellant was adjusted at GGMS Riyala. Where the appellant is serving presently, appellant submitted application for transfer in new upgraded school GGMS Mair Muzaffar but she had not adjusted at GGMS Maira Muzaffar, due to that respondent No 4 applied for this post along with her medical reports/certificate, on these medical reports respondent No 4 was adjusted at GGMS Maira Muzaffar Mirpur Abbottabad. Application and medical reports are annexed as Annexure "A"
4. Para No.4 is incorrect. Respondent No 4 is treated according with law and rules. Respondent NO 4 is adjusted on medical and humanitarians grounds.
5. Para No 5 is correct that appellant submitted an application for transfer/adjustment, appellant application was not entertain letter on after the issue of adjustment order of the Respondent No 4, appellant filled departmental appeal but her appeal was also not entertain/decided in appellant favor. Appellant treated accordance with law and rules. In near future appellant would be adjusted nearest on the availability of DM post. Appellant is not aggrieved by respondent No 4 order, respondent No 4 is adjusted on medical ground.

GROUNDS

- a. Incorrect. The appellant has been treated in accordance with law and rules respondent No 4 was adjusted on medical and humanitarian grounds.
- b. Incorrect. Reply is that appellant serving in education department since 2003; appellant was submitted application but not adjusted at GGMS Maira Muzaffar, respondents No 4 applied along with medical reports, Respondent No 4 has been adjusted at GGMS Maira Muzaffar Mirpur, Abbottabad. Appellant and the Respondent No 4 treated accordance with rules and law/policy.
- c. Incorrect. Appellant treated according with law and rules.
- d. Incorrect. The respondent No 4 is adjusted on medical and humanitarian grounds. She was adjusted Government policy. Adjustment of the respondent on medical grounds.
- e. Incorrect. Respondent No 4 is transferred on free independent mind and also with in the medical grounds.
- f. Incorrect. Order of the respondent No 4 in with independent mind and in the interest of public and in purpose of education.
- g. Incorrect. Detail reply has already been given in above Paras.
- h. Incorrect. Appeal has badly time bard.

i. Incorrect appellant is not aggrieved it is the wastage of precious time of Honourable Tribunal.

It is therefore humbly prayed that in the light of foregoing comments, the appeal may graciously be dismissed with cost throughout.

District Education Office
Female, Abbottabad

Jammyal
(Respondent No. 3)

[Signature]
DIRECTOR
Primary & Secondary Education
NWFP, Peshawar.
Director (E & SE)
Khyber Pakhtunkhawa
Peshawar.

[Signature]
(Respondent No. 2)

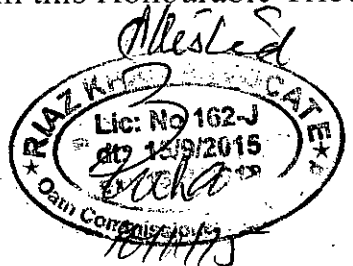
Secretary Education (E & SE)
Khyber Pakhtunkhawa
Peshawar.

(Respondent No. 1)

[Signature]
Through Representative

AFFIDAVIT:

Stated on oath that the contents of instant Para wise comments are true and correct to the best of my Knowledge and belief and nothing has been concealed from this Honourable Tribunal.



Jammyal
Respondent No 3

found correct
& vetted
M. Lari
GP ST AD
31/8/15.

محترم جناب ڈی ڈی امی۔ او صاحبہ (زنانہ) سٹارٹ اپ ایڈیٹریز

صفحہ

دو خواستے برائے ٹرانسپیر
Annexure A

جناب عالیہ!

موردبانہ گزارش ہے کہ سائلہ محکمہ تعلیم میں بحیثیت
ڈائریکٹ ماسٹر گورنمنٹ گرنرز مڈل سکول لڑ چھ پیسے اپنے فرانس
انجام دے رہی ہے جناب یہ سکول سائلہ کی دیالٹس سے بہت
دور دراز واقع ہے۔

سکول دور دراز ہونے کی وجہ سے آنے جانے میں بہت دشواری
کا سامنا کرنا پڑتا ہے۔

یہ کہ سائلہ کے چار (4) اپریشن ہو چکے ہیں جس کی وجہ سے
سائلہ کو سفر کی وجہ سے بہت تکلیف ہوتی ہے۔

جناب عالیہ سائلہ کو قریب ذرائع سے معلوم ہوا ہے کہ گورنمنٹ
گرنرز مڈل سکول پیرامظفر اپ گریڈ ہوا ہے اور اسے پید عام کینڈرز
کی پوسٹوں کی Sanction پوائنٹ ہے سائلہ ملتفت ہے کہ ڈی ایم
پوسٹ پر تعینات فرعا کر شکرہ یہ کا موقع حیرت

المعارفہ
Shazia Bano

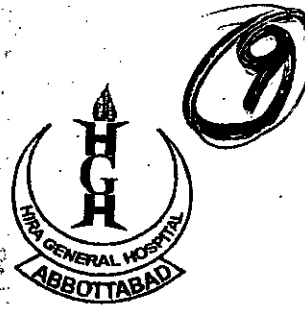
شازیہ بانو ڈی ایم

گورنمنٹ گرنرز مڈل سکول لڑ چھ

Hira General Hospital

Sarban Chowk Link Road,
Abbottabad.

Phone: 0992-336063
: 0992-334403



حراجنرل ہسپتال

سر بن چوک لنک روڈ ایبٹ آباد

فون نمبر: 0992-336063
0992-334403

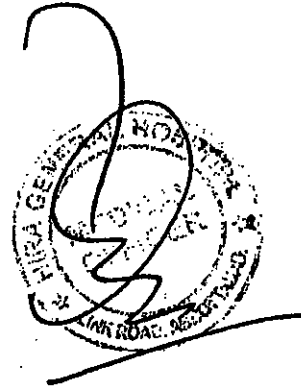
Name Shazia Bano Age 20 yrs Sex F Date 30/06/14

MEDICAL FITNESS CERTIFICATE

Weight

It is certified that Shazia Bano came to us with cholelithiasis for which she under gone cholecystectomy. Now she had no problem regarding her health & her condition is healthy.

So, I declare her medically fit



Investigation

24 گھنٹے ایمر جنسی کی سہولت

Not Valid for Court (For Treatment Purpose Only)

Hira General Hospital (PVT) Ltd.

Sarban Chowk Link Road,
Abbottabad.

Phone: 0992-336063

0992-334403



حراجنرل ہسپتال پرائیویٹ لمیٹڈ

سر بن چوک لنک روڈ ایبٹ آباد

0992-336063

0992-334403

Name Shazier Bano Age 40y Sex fe Date 18/04/2024

Weight

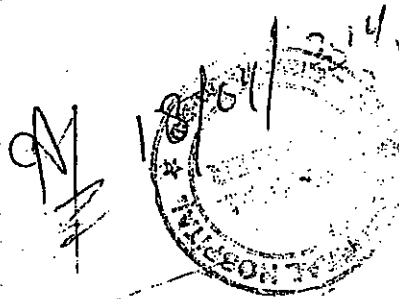
patient had cholelithiasis and her

Cholecystectomy had done at 3/04/2024.

She was on ~~the~~ leave of 10 days but

upto now no improvement is there so

she needs rest of one week more.



Investigation

24 گھنٹے ایمر جنسی کی سہولت

Not Valid For Court (for Treatment Purpose Only)

Hira General Hospital

Sarban Chowk Link Road,
Abbottabad.

Phone: 0992-336063
: 0992-334403



حراجزل ہسپتال

سر بن چوک لنک روڈ ایبٹ آباد

فون نمبر: 0992-336063
0992-334403

Name Shazia Bano Age 40y Sex F Date 8.4.14

Weight

Patient had Cholelithiasis and
her cholecystectomy done. (gall bladder
removed) and she needs at
least 10 days bed rest.

Investigation

24 گھنٹے ایمر جنسی کی سہولت

Not Valid for Court (For Treatment Purpose Only)

M 2027

(12)

Lady Dr.

Sr #

Nadia Haroon

General Practitioner & Gynae OPD

M.B.B.S, R.M.P

Ayub Hospital College

Abbottabad

Ph # (Clinic) _____

Cell #: 0345-6395301

کلینک

نزد شمع بیکری مری روڈ جگیاں ایبٹ آباد

اوقات شورو: موسم سرما 4:00 بجے تا شام 7:30 بجے

موسم گرم: 5:00 بجے تا شام 9:00 بجے

پہنچتی روز اتوار

لیڈی ڈاکٹر نادیہ ہارون

جنرل پریکٹیشنر اینڈ گائنی اوپن ڈی

ایم بی بی ایس، آر ایم پی

ایوب میڈیکل کالج ایبٹ آباد

Pt's Name Shezib Sultan

Age: — Date: 20-1-14

Clinical Notes

Rz Abs All
LBB 2/2y

Rx

cytology done
→ 4 cm
left kidney held
→ in septum
kneel to
upheld

- sup
- Rx

W.D. 14-14

q

- Rt. femur

cat

pan

Cur

- Basilar

Rx

- Rt. leg

cat

pan

Rx

q

BR 140/80mm

Cur

sup

Rx

دو ہفتے کی تاریخ: Beemin Yu sc (5)

درد

Meliane

درد

cur 2mg

vel

درد Quil D. (2)

درد

Rx. oceli sup

vel

Mu scul

vel

Gawen

24 24

du

Lady Dr.

Nadia Haroon

General Practitioner & Gynae OPD

M.B.B.S, R.M.P

Ayub Hospital College

Abbottabad

Ph # (Clinic) _____

Cell #: 0345-6395301

کلینک

13

Sr #

نزد شمع بیکری مری روڈ جھکیاں ایبٹ آباد

اوقات مشورہ: موسم سرما 4:00 بجے تا شام 7:30 بجے

موسم گرم: 5:00 بجے تا شام 9:00 بجے

پیشہ بروڈا تواری

لیڈی ڈاکٹر نادیہ ہارون

جنرل پریکٹیشنر ایبٹ آباد کانسٹی اوپن ڈی

ایم بی بی ایس، آرا ایم پی

ایوب میڈیکل کالج ایبٹ آباد

Pt's Name

Shezib Bhat

Age: _____

Date: _____

30-9-13

Clinical Notes

G/R Abz Abz

Rx

1 B 2 2 1/2
2 L 1 1/2 1/2

Both by
epent

Adus

EAC

UMR 20-6-13

EMR 27-3-14

Abz. 14ml kaly.

ef
p

- Anal
anal
3ml

- No stein
of u
2ml

f BR 14/9/13

دوبارہ معائنہ کی تاریخ:

Jwadh

Lady Dr. Ruqia Sultana

GYNAECOLOGIST



لیڈی ڈاکٹر رقیہ سلطانہ

Assistant Professor

M.B.B.S, F.C.P.S

Ayub Medical College

Abbottabad.

Clinic Ph #: 0992-385666

کلینک + میسرینی ٹھکانہ

بالتقابل مقدس ٹاور عقب مبارک پلازہ

ہائپر روڈ منڈیاں ایبٹ آباد

او۔ پی۔ ڈی کلینک 4 تا 8 بجے

(ماہر امراض نسوان) گائناکالوجسٹ

اسٹنٹ پروفیسر ایوب میڈیکل کالج ایبٹ آباد

ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ بی۔ ایس

Pt's Name

Shazia

Date 23 / 7 / 2011

BR

Not Valid for Medico Legal Purpose

Clinical Notes

PLOP

Le. Fol. Ovaria

1 + 1

Fol. Vellera

1 + 1

Cap. Cervic. vil

1 + 1

Lady Dr. Ruggia Sultana

GYNAECOLOGIST

Assistant Professor

M.B.B.S, F.C.P.S

Ayub Medical College

Abbottabad

Ph #: Clinic: 385666

15

ڈاکٹر رقیہ سلطانہ

(ماہر امراض نسوان) گائناکالوجسٹ

اسٹنٹ پروفیسر

ایم۔ بی۔ بی۔ ایس۔ ایف۔ سی۔ پی۔ ایس

ایوب میڈیکل کالج ایبٹ آباد

کلینک + میسرینی شہاد

بالمقابل مقدس ٹاور عقب مبارک پلازہ

نزد برٹش سنگ سنٹر ماٹرنہ روڈ منڈیاں ایبٹ آباد

او۔ پی۔ ڈی کلینک 2 سے 8 بجے

Pt's Name

Shazia Bano

Date 13-1-2011

Bp. 110/70

Not Valid for Medico-Legal Purpose

Clinical Notes

MF 6yrs

G₇P₁Ab₂Al₁-3

LBB: 4yrs
Flb-C/ee

L.M.P.: 27-10-2010

EDD: 3-8-2011

POG: 14 wks

- Yc:-
- GA - 2 months
 - Anchedy
 - Sore throat & cough
 - Due to cough pain in lower abdomen.

USG:

- SAF

BPD = CRL = 42.6

POG = 11⁺ wks

EDD = 20-05-2011

Rx:

Tab Augmentin 625mg

ODS - 1+1

Tab Panadol CF

ODS - 1+1+1

→ cyp. hydaline DM.

ODS - 2+2+2

Tab Abet folie

ODS - 2+2+2

Tab. Calson.

ODS - 2+2+2

ایمرجنسی کے علاوہ اتوار کو چھٹی ہے۔

Lady Dr. Ruggia Sultana

GYNAECOLOGIST

Assistant Professor

M.B.B.S, F.C.P.S

Ayub Medical College

Abbottabad

Ph #: Clinic: 385666



لیڈی ڈاکٹر رقیہ سلطانہ

(ماہر امراض نسوان) گائناکالوجسٹ

اسٹنٹ پروفیسر

ایم۔بی۔بی۔ایس۔ایف۔سی۔پی۔ایس

ایوب میڈیکل کالج ایبٹ آباد

کلینک + میسرنس شوہم

بالتقابل مقدس ناور عقب مبارک بازارہ

نزد برنس سنگ سٹرا نمبر ۲ روڈ منڈیاں ایبٹ آباد

او۔پی۔ڈی کلینک ۲ سے ۸ بجے

Pt's Name

Shazia Bano

Date: 13-12-10

Not Valid for Medico-Legal Purpose

Clinical Notes

MF-6yr

P, Abt, - 13

UBB-4yr

fb 4/3

L.M.P.: 27-10-2010

Yc: For Confirmation of pregnancy. previous hx for operated Cyst-1yr.

B.p. 110/80

Rx. - IVF - 25000000

گڈ ٹی ٹی ۲ کر لیں - ۱۲

Sals Duphaston

۱۲۹ x ۱۱۵

Sals Folic Acid 5mg

۱۲۹ x ۱۱۵

Sals Loprin 750

۱۲۹ x ۱۱۵

Signature

ایمر جنسی کے علاوہ اتوار کو چھٹی ہے۔

Lady Dr. Ruzqia Sultana

GYNAECOLOGIST

M.B.B.S, F.C.P.S
Assistant Professor

Ayub Hospital Complex

Abbottabad

Clinic Ph. #: 0992-385666

Pt's Name Shazia

(ماہر امراض نسوان) گائناکالوجسٹ

ایم۔ بی۔ بی۔ ایس۔ ایف۔ سی۔ پی۔ ایس

اسٹنٹ پروفیسر ایوب میڈیکل کالج ایبٹ آباد

ایمرضی 24 گھنٹے

Date 23/11/2007

لیڈی ڈاکٹر رقیہ سلطانہ

کلینک + میٹرنٹی ہوم

بالقابل مقدس نادری عتبہ مبارک بازارہ

ماسمہ روڈ منڈیاں ایبٹ آباد

اور۔ پی۔ ڈی کلینک 4 تا 8 بجے

Clinical Notes

post-op

ت/ع

wound clean

Rx:-

Tab. onelox

5 دن — 1+1

spricel

سے صبح شام 2 گیم صاف کرے

Tab. veru

7 دن — 1+1+1

1

کلینک آنے سے ایک دن پہلے فون پر نمبر لیں

ایمرضی کے علاوہ اتوار کو چھٹی ہے۔

RIJA CLINIC & MATERNITY HOME

OPPOSITE GRID STATION MURREE ROAD ABBOTTABAD

Reviews C. S. 24 Hours Service
A.T.H.

Name: Faziz

Age: 30y

Date: 10/4/08

Referral:

OBSTETRICAL ULTRASOUND REPORT

Number of foetus : 1/2/3
Foetal cardiac activity : Press / Abs
Foetal Body Movement : Press / Abs / Sluggish
Lie : Longitudinal / transverse / oblique
Presentation : Cephalic / breech / shoulder
Amniotic fluid : Adequate / Scanty / in excess
Placenta : Fundal-anterior / Posterior
Loweruterinesegment
Covering Os / Not covering Os

Diameter of gestational sac : 40 mm ... & wks
Biparietal Diameter : mm wks
Abdominal circumference : mm wks
Femoral Length : mm wks
Gestational Age : 8wks +/- 1 weeks
Expected Date of Delivery : 19-6-08 + 15 days

amp

Facilities are available: whole body ultra sound scanning with out any side effects or radiation, scanning for DVT, Tubal Potency test True cut or Fine needle aspiration biopsies.

رجاء کلینک اینڈ میٹرنٹی ہوم بالقابل بجلی گھر نزد کالائیل مری روڈ ایبٹ آباد

Lady Dr. Ruggia Sultana

GYNAECOLOGIST

Assistant Professor

M.B.B.S, F.C.P.S

Ayub Medical College

Abbottabad

Ph #: Clinic: 385666



لیڈی ڈاکٹر رقیہ سلطانہ

(ماہر امراض نسوان) گائنا کالوجسٹ

اسسٹنٹ پروفیسر

ایم۔ بی۔ بی۔ ایس۔ ایف۔ سی۔ پی۔ ایس

ایوب میڈیکل کالج ایبٹ آباد

ایمرجنسی 24 گھنٹہ

کلینک + میٹرنٹی ہوم

بلدقابل مقدس نادور عقب مبارک پلازہ

نزد برٹش سلنگ سٹرا سٹرو روڈ منڈیاں ایبٹ آباد

او۔ پی۔ ڈی کلینک 4 سے 8 بجے

Shazia Bano

Date 3/11/20

Pt's Name

Clinical Notes

// Laparotomy - 16 days back.

Uo. Pain however

Medical leave B.R. 11/10/20
Laparotomy

for ovarian cyst.

Now she has advised
leave from 5.11.20
- 20.11.20.

DR. RUGGIA SULTANA
M.B.B.S, F.C.P.S
Assistant Professor
Ayub Medical College
Abbottabad

ایمرجنسی کے علاوہ اتوار کو چھٹی ہے۔

ڈاکٹر نسرت آرا
 previous experience in
 gynecology & surgery

25

Dr. Nusrat Ara

M.B.B.S, R.M.P

Physician & Surgeon

Mobile: 0300-5617644

Pt's Name:

Shaziq

Age:

3yrs

Sex:

M

Date:

3/11/08

ڈاکٹر نسرت آرا

ایم۔ بی۔ بی۔ ایس، آر۔ ایم۔ پی

فزیشن اینڈ سرجن

ماہر امراض زچہ و بچہ، حاملہ و بانجھ پن

Clinical Record

10 2 1/2 yrs
 - 1 abnorm 3 mths
 - E & C done in hospital

410 Norm
 - dyspepsia
 - Nausea
 - Vomiting

L.M.P.
 7-9-08
 400
 14-6-08

10 2 1/2 yrs
 - 1 abnorm 3 mths
 - E & C done in hospital

Rx

Am Gravilamin
 - 1000 mg daily

1000 mg daily
 - 1000 mg daily

1000 mg daily
 - 1000 mg daily

1000 mg daily
 - 1000 mg daily

1000 mg daily

بالمقابل بجلی گھر نزد کالائیل مری روڈ ایبٹ آباد

Treatment At Home

2 sup amoxicil
1+1+1

U=5
=.

Tabs Pansterin

1+1+1

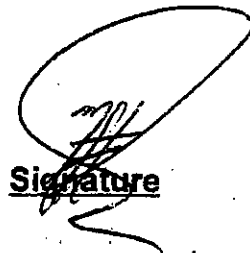
Tabs Z cutter

1+1

~~sup Cramox~~

sup Cerazyme

1+1


Signature

Phone Off: 334403
Exchange: 336063



HIRA GENERAL HOSPITAL (PVT) LTD.

Opp: Taj Mehal Cenima, Link Road, The Mall Abbottabad

DISCHARGE SLIP

Name of the Patient Shazida bi bi

Age 40 yrs Sex Female

Date of Admission 2-4-14 Date of Operation 3-4-14

Date of Discharge 05-04-14

Diagnosis Cholelithiasis

Procedure Cholecystectomy done



History

Pain abdomen.
↓ epistaxis

Anesthesia

G.A

Procedure

Cholestyramine given
multiple stones removed.

Investigation

Treatment At Hospital

5% G/saline
1000 cc $\frac{1}{6}$ x O.D

inj Zimox 1g $\frac{1}{6}$ x B.D

inj vamin $\frac{1}{m}$ x B.D

inj Wellsin/paracetamol $\frac{1}{m}$ S.O.S

Consultant

Dr. _____

Sam San Sits.

7. Treatment for Home

(2)

- 1). Cap. Naproxen 400mg 1+1 دن
- 2). Tab. Flajj 400mg 1+1 دن
- 3). Tab. Panetan forte 1+1 دن
- 4). Tab. Neurtral 1+1 دن
- 5). Taj - Voren 75mg گوشت میں لگاؤ اس دود
3 سے 4 دن
- 6). Glucosa Drops 36 قطرے فٹہ میں پیئیں
3 سے 4 دن

8. Instructions

- 7) Ensure Powder دود میں دود میں کھائیں
- 8) Polymer Ointment
(1) صفائی کا خیال رکھیں۔ اس کا استعمال کریں۔
(2) دوا باقاعدگی سے لیں۔ بیچے کے ناف پر لگائیں۔
(3) کسی بھی مسئلے کی صورت میں فوراً ہسپتال سے رابطہ کریں۔
(4) بیچے کو حفاظتی ٹیکوں کا کورس مکمل کروائیں۔

9. Follow up

1 to 2 دن بعد دوبارہ آکر دیکھائیں



Dr. Ruqia Sultana Clinic & Maternity Home
Behind Mubarik Plaza, Opp Muqaddas Tower
Mansehra Road, Mandian, Abbottabad
Ph #: 0992-385666

1. Name: Shazia Hayat

Age: 30 yr

Address: ATD

D.O.A. - 18-7-2011 D.O.O. - 18-7-2011 D.O.D. - 20-7-2011

Operation: C-SECTION

indication: C₂ PA₁ + FTP + previous 1 sec + CPD

2. Surgeon: DR. Ruqia Sultana

Anaesthesia: SPINAL

Blood Transfusion: _____

Condition at Discharge

23

23

REHMAN HOSPITAL

Zarbat Medical Center, Abbottabad
Ph: # 0992-335082, Reception: 0992-330608

Histopathology Report

DISCHARGE CARD

گھر کے لئے علاج و مشورہ

Tab Amclaw 625mg

وٹس — 1-1-14

Tab Ponstan 400

وٹس — 1-1-14

Tab cytopar

وٹس — 1-1-14

Tab Pantent PA

Signature: _____

Glubiron Tab/Syp

Cephride Cap/Susp
250/500mg, 125/250mg

Lady Dr. Shazia Younis
(Gynaecologist)

Dr. Muhammad Younis
M.B.B.S, M.C.P.S, F.C.P.S
Orthopaedic Surgeon

Patient's Name Shazia Bano Age 50

Husband's Name Ayaz Ahmed

Date of Admission 1-10-13 Date of Operation: 1-10-13

Date of Discharge 1-10-13 Serial No: _____

Diagnosis Grand G5 P2^{e2} @ 8 weeks missed
Abortion

Operation Dande

24

Pre-Operative Investigation

Blood gb Aev

Hb% 108/dl

HBS AG -u

Anti HCV -u

Pit. Count _____

CT/BT _____

BSR _____

Pre-Operative Treatment

inf. hepatobiliary tract
e. 60 unit syringe

Post-Operative Treatment

Investigation

Hb% _____

Urine RE _____

Baby Blood Gp _____

Blood Gp Husband _____

Operation Note

Date: _____

placenta of RPOC's removed
followed by gentle curettage

Baby Notes

Sex: _____

Wt: _____

A/S: _____

Complications