

Sr. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	02.11.2015	<p data-bbox="613 423 1409 506" style="text-align: center;"><b>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</b></p> <p data-bbox="784 549 1214 589" style="text-align: center;">Service Appeal No. 305/2015.</p> <p data-bbox="639 632 1422 715" style="text-align: center;">Mst. Surriya Begum Versus Chief Secretary, Govt. of KPK, Peshawar etc.</p> <p data-bbox="756 758 951 798" style="text-align: center;"><u>JUDGMENT</u></p> <p data-bbox="613 841 1468 1212"> <u>PIR BAKHSH SHAH, MEMBER.-</u> Counsel for the appellant (Nasar Mahmood Advocate), Asstt. Advocate General (Mr. Kabeerullah Khattak) for official respondents and counsel for private respondent No. 4 (Mr. Noor Muhammad Khattak, Advocate) present. </p> <p data-bbox="613 1312 1468 2018"> 2. The appellant was transferred from GGHS Islamia College, Peshawar vide order dated 29.01.2015. There-from she was transferred to GGHS Begum Shahabud Din vide impugned order dated 03.04.2015, wherefrom private respondent No. 4 was transferred in her place. Her departmental appeal was also rejected vide order dated 08.04.2015, hence this appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. </p> <p data-bbox="613 2111 1295 2152">3. Arguments heard and record perused.</p> <p data-bbox="613 2245 1468 2371">4. The learned counsel for the appellant submitted that the appellant was transferred prematurely, after two</p>

months and four days, hence the impugned order is not sustainable. He further submitted that private respondent No.4 (Mst. Zuhra Bibi) has been transferred from GGHS Begum Shahabud Din to GGHS Islamia Colligate, Peshawar through the impugned unlawful order. He prayed that the impugned order may be set aside.

5. The learned counsel for private respondent No. 4 while assisting the learned Assistant Advocate General resisted the appeal and stated that post at Islamia Colligate was became vacant on which respondent No. 4 on completion of her tenure at GGHS Begum Shahabud Din submitted application to the authority to be transferred to GGHS Islamia Colligate Peshawar on humanitarian ground as her blind daughter Mss. Lalarukh Yousazai was also studying in MA Arabic Previous Examination, 2015 as a regular student in Department of Arabic, University of Peshawar. He further submitted that both the schools are in the city of Peshawar and that the tenure policy would not apply in this case.

6. It transpired from perusal of the record as well as arguments, that Departmental authority while disposing of departmental appeal of the appellant, has given cogent reason that private respondent No. 4 was transferred on humanitarian ground as her dependant blind daughter Mss. Lala Rukh is studying in Arabic Department, University of

Peshawar. Both the schools Islamia College and Begum Shahabud Din fall in the city of Peshawar. Hence, the Tribunal in these circumstances is reluctant to interfere in the matter. Consequently, the appeal is dismissed and impugned order is left intact. The stay order, if any, is vacated. During the course of arguments, it was pointed out by learned counsel for the appellant that since private respondent No. 4 is going to be promoted soon and she may vacate her post at Islamia College in which eventuality, the department if deems proper may also consider case of the appellant purely on merit. Parties are left to bear their own costs.

ANNOUNCED  
02.11.2015.



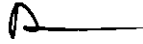
(ABDUL LATIF)  
MEMBER



(PIR BAKHSH SHAH)  
MEMBER

08.09.2015

Junior to counsel for the appellant and Mr. Khurshid Khan, SO alongwith Addl: A.G for official respondents No. 1 & 2 present. Junior counsel for the appellant requested for adjournment as senior counsel for the appellant is stated busy before the august Supreme Court of Pakistan. To come up for arguments on 22-9-15. Status-quo is extended till the date fixed.



Member



Member

22.09.2015

Counsel for the appellant, Mr. Muhammad Jan, GP with Khursheed Khan, SO for the official respondents and Mr. Noor Muhammad Khattak, Advocate for private respondent No. 4 present. Arguments of the learned counsel for the appellant partly heard. The plea of the learned counsel for the appellant is that having a blind daughter private respondent No. 4 was transferred to Islamia Collegiate Peshawar through the impugned order. This reason has not been given in the impugned order. Therefore, the Tribunal deems it appropriate to requisition posting/transfer record of private respondent No. 4 for the last five years. To come up for such record and further arguments on 2-11-2015. In the meanwhile status quo be maintained.



MEMBER



MEMBER

26.06.2015

Clerk of counsel for the parties and Asstt. AG for the official respondents present. Due to general strike of the bar, counsel for the parties are not available. Therefore, case is adjourned to 15.07.2015 for arguments. Till then status quo is extended.


  
Member

  
Member

13.07.2015

Junior to counsel for the appellant (Syed Abdul Hafiz Advocate), Asstt. AG with Khursheed Khan, SO for the official respondents and Mr. Noor Muhammad Khattak, Advocate for private respondent No. 4 present.

Junior to counsel for the appellant submitted an application stating therein that the learned senior counsel for the appellant is appearing before the august Supreme Court of Pakistan, Islamabad in CPLA No. 800/2015 "titled Habibullah Wazir Versus SMBR etc.". Application placed on file. As such the appeal is adjourned. The learned counsel for private respondent No. 4 stated that the matter pertains to transfer, and requested that the case may be fixed shortly. Therefore, case to come up for arguments by way of last chance on 13-08-2015 the date convenient to the diaries of the learned counsel for the parties. Status-quo is extended till the date fixed.

  
Member

  
Member

13.08.2015

Counsel for the appellant and Muhammad Jan, GP for the respondents present. Learned counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 08-09-2015 Status-quo is extended till the date fixed.

  
Member

  
Member

4

30.04.2015

Counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1, Javed Ahmed, Supdt. for respondent No. 2 alongwith Addl: A.G for official respondents No. 1 to 3 and agent of counsel for private respondent No. 4 present. Reply to application as well as comments by respondents No. 1 to 3 submitted, while Wakalat Nama on behalf of private respondent No. 4 submitted and request for adjournment was made. To come up for written reply on behalf of private respondent No. 4 and arguments on stay application on 15.5.2015. Till then status-quo be maintained.

  
Chairman

5

15.05.2015

Counsel for the appellant, M/S Khurshid Khan, SO, Javed Ahmed, Sudpt. alongwith Addl: A.G for official respondents No. 1 to 3 and counsel for private respondent No. 4 present. Written reply submitted on behalf of private respondent No. 4. The appeal is assigned to D.B for rejoinder, arguments on stay application as well as main appeal on 10.6.2015. Till then status-quo be maintained.

  
Chairman

11.06.2015

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Rejoinder submitted. Copy handed over to the learned GP. To come up for arguments on 26.06.2015. Till then status-quo be maintained.

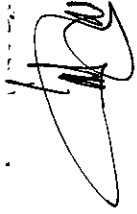
  
Member

  
Member

3. 14.04.2015

Counsel for the appellant and Asstt: AG for the respondents present. Learned counsel for the appellant argued that appellant was serving as Principal (BPS-18) at GGHS Hassan Zai Charsadda when transferred and posted as Principal (BPS-18) at GGHS Islamia Collegiate, Peshawar against the vacant post vide notification dated 29.01.2015. That after lapse of about two months and four days the appellant was transferred and posted from the said school to GGHSS Begum Shahabuddin as Vice Principal which order is violative of the approved policy of the government being pre-mature. That the appellant preferred departmental appeal against the impugned order dated 03.04.2015 on 06.04.2015 which was rejected vide order dated 08.04.2015 and hence the instant service appeal on 09.04.2015.


Appellant Deposited  
Security & Process Fee



11 - W - 111  
That the impugned transfer order is against the approved policy of the provincial government and is therefore liable to be set aside.

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/comments for 30.04.2015 before S.B.

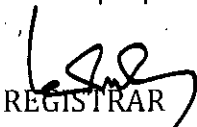

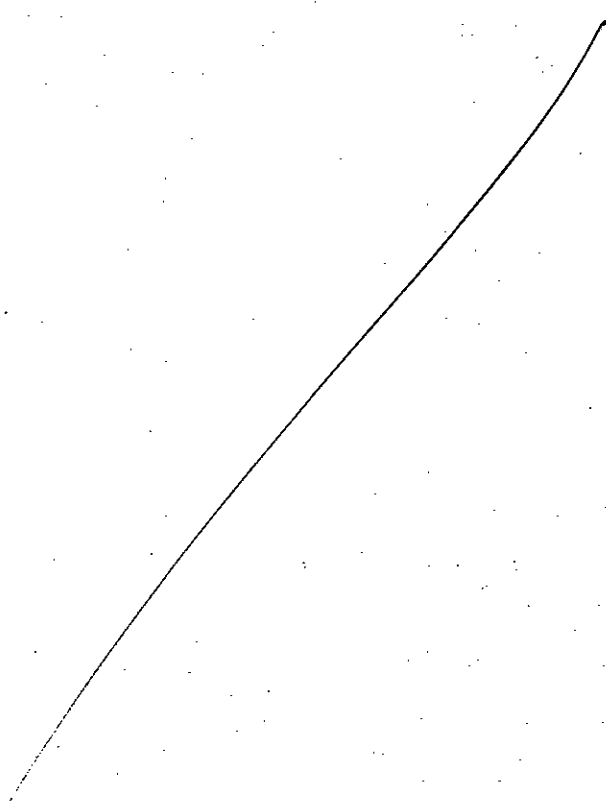
Notice of stay application be also issued for the date fixed. Till then status-quo be maintained.

  
Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 305/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09.04.2015	<p>The appeal of Mst. Surriya Begum presented today by Mr. Nasir Mahmood 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		<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>14-4-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 



BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO... 305 ..... 2015

Ms. Surriya Begum, Principal, BPS-18 Govt. Girls High School Islamia  
Collegiate, Peshawar..... Appellant

Versus

Chief Secretary Govt. of KPK Civil Secretariat  
Peshawar..... Respondents

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4.	Departmental Appeal	C	8 + 8A
5.	Order dated 08.04.2015	D	9
6.	Waklat Nama		

*Surriya*  
Appellant

Through

*Nasir Mahmood*  
Nasir Mahmood Advocate, 9/4/15  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.  
Mob.No.0333-9176275

①

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.....305.....\2015

A.W.F PROVINCE  
Service Tribunal  
Diary No 320  
Dated 09-4-2015

Ms.Surriya Begum, Principal, BPS-18 Govt. Girls High School Islamia  
Collegiate, Peshawar.....Appellant

Versus

1.Chief Secretary Govt. of KPK Civil Secretariat Peshawar.

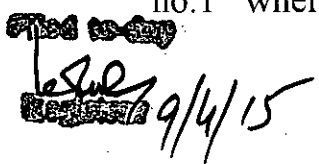
2.Secretary Elementary & Secondary Education Department Civil Secretariat  
KPK Peshawar.

3.Director Elementary & Secondary Education Dabgari Gardens KPK Peshawar.

4.Ms.Zuhra Bibi V\Principal GHSS Begum Shahabuddin,  
Peshawar.....Respondents

**Service Appeal U\Section 4** of the KPK Service Tribunal Act, 1974 against the order dated 08-04-2015 passed by respondent no.1 whereby departmental appeal of the appellant against order dated 03.04.2015 passed by respondent no.2 whereby appellant was transferred from Govt. Girls High School Islamia Collegiate, Peshawar to GHSS Begum Shahabuddin, Peshawar, hence the instant appeal.

**Prayer in Appeal;** To set-aside the order dated 08-04-2015 passed by respondent no.1 whereby departmental appeal of the appellant against order dated

  
9/4/15

dated 03.04.2015 passed by respondent no.2 and appellant be allowed to complete his term in Govt. Girls High School Islamia Collegiate, Peshawar.

Respectfully Sheweth;

1. That the appellant was transferred from Govt. Girls High School Hassan Zai, Charsadda to Govt. Girls High School Islamia Collegiate, Peshawar vide office order dated 29.01.2015. (Copy of the transfer order is attached as annexure-A).
2. That the appellant had hardly completed Two months and four days in Govt. Girls High School Islamia Collegiate, Peshawar that she was transferred to GHSS Begum Shahabuddin, Peshawar vide office order dated 03.04.2015. (Copy of the transfer order is attached as annexure-B).
3. That the appellant preferred departmental appeal (Copy attached as annexure-C) to respondent No. 1 which was rejected by the said respondent through order dated 08.04.2015 (Copy attached as annexure-D) hence the present appeal 1 inter alia on the following grounds;

### Grounds

- A. That the respondents have not treated the Appellant in accordance with law and rules on the subject and acted in violation of article-4 and 25 of the constitution of Islamic republic of Pakistan, 1973 and unlawfully transferred the appellant from one place to another before the completion of her which is unjust, unfair hence not sustainable in the eye of law.
- B. That the transfer order dated 03-04-2015 is politically motivated and has been in colorful exercise of power thus is liable to set-aside on this score alone.
- C. That the impugned transfer order dated 03-04-2015 passed by respondent no.2 and up held by respondent no.1 is highly illegal, malafide, arbitrary, discriminatory, and whimsical untenable, without jurisdiction and without lawful authority and is thus liable to set-aside.
- D. That the impugned transfer order is malafide, pregnant with ulterior motive and is the outcome of political pressure which appears to be a classical

example of favoritism, nepotism on one hand and an abusive exercise of official authority on the part of the persons at the helm of affair on the other.

- E. That the ground put forward in the rejection of departmental appeal order is no order in the eye of law and further the appellant is also having small kids in home to look after thus the order is not maintainable.
- F. That the appellant seeks leave of this honorable tribunal to argue additional grounds at the time of final hearing of this appeal.
- G. That the fundamental rights of the appellant have been badly violated because he has been made rolling stone by transferring from one place to another in short span of time.

Any other remedy not specifically asked for but appropriate in the circumstances of the case may also be awarded to the appellant.

*Sunaf*

Appellant

*Nasir Mahmood*

Through

Nasir Mahmood Advocate,  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.

Affidavit

I, do hereby declare, and affirm on oath that the contents of accompanying writ petition are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble court.

*Sunaf*

Deponent



9/09/015

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.....\2015

Ms.Surriya Begum, Principal, BPS-18 Govt. Girls High School Islamia Collegate, Peshawar..... Appellant

Versus

Provincial Govt. through Chief Secretary KPK Civil Secretariat Peshawar and others..... Respondents

Application for suspending the operation of impugned order dated 03-04-2015 passed by respondent no.1 till the final disposal of the instant appeal.

Respectfully sheweth;

1. That the captioned appeal is being filed before this Honorable Tribunal in which no date of hearing has yet been fixed.
2. That the grounds mentioned in the appeal may be read as an integral part of this application.
3. That on face of it the applicant\appellant has got a strong prima facie arguable case in her favor and is sanguine about its success.
4. That the balance of inconvenience tilts in favor of grant of interim relief.

5. That the interim relief if not granted to the applicant\appellant she would suffer irreparable loss not redeemable in terms of money.

It is, therefore, respectfully prayed that on acceptance of this application interim relief as prayed for in the heading of the application may be granted to the applicant's\appellant till the final disposal of the instant appeal.

*Surray*

Appellant

Through

*Nasir Mahmood*

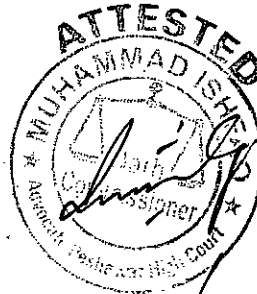
Nasir Mahmood Advocate  
13-D Haroon Mansion Peshawar.

Affidavit

I do hereby declare and affirm on oath that the contents of the above application are true and correct to the best of my knowledge and belief and noting has been concealed from this honorable court.

*Surray*

Deponent



9/04/15



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar January 29, 2015.

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2015/Surraya Begum: Ms. Surraya Begum Principal (BS-18) GGHS Hassan Zai, Charsadda is hereby transfered and posted as Principal (BS-18) at GGHS Islamia Collegate, Peshawar against the vacant post with immediate effect.


2. No TA / DA allowed.

SECRETARY

Endst.of even No & date

Copy forwarded to the:-

- 1. Accountant General, Khyber Pakhtunkhwa Peshawar.
- 2. Director, E&SE, Peshawar.
- 3. District Education Officer (F) Charsadda & Peshawar.
- 4. District Accounts Officer Charsadda.
- 5. Incharge EMIS, E&SE Department.
- 6. PS to Secretary E&SE Department.
- 7. Officer concerned.
- 8. Office order file.

  
(FOZIA NAZ)  
SECTION OFFICER (S/F)

  
**Certified to be  
True Copy**



**7P**  
KHYBER PAKHTUNKHWA Amexite "B"  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar April 3, 2015.

**NOTIFICATION**

**NO.SO(S/F)E&SE/4-16/2015/Zuhra Bibi & Surrava Begum (P):** The following posting / transfer of female officers are hereby ordered in the public interest with immediate effect:-

S.No	Name, Designation & place of posting	To	Remarks
1	Ms. Zuhra Bibi V/Principal (BS-18) GGHSS Begum Shahabuddin, Peshawar	Principal (BS-18) GGHS Islamia Collegiate, Peshawar.	Vice S.No.2
2	Ms. Surrava Begum Principal (BS-18) GGHS Islamia Collegiate, Peshawar	V/Principal (BS-18) GGHS Begum Shahabuddin, Peshawar	Vice S.No.1

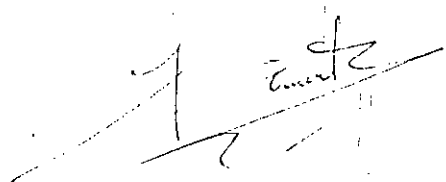
2. No TA / DA allowed.

Endst.of even No & date

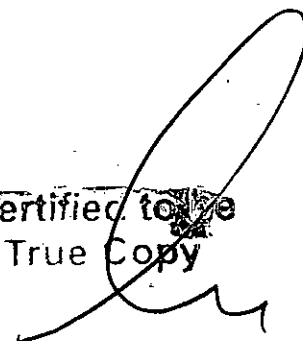
**SECRETARY**

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. District Education Officer (F) Peshawar.
4. Incharge EMIS, E&SE Department.
5. PS to Secretary E&SE Department.
6. Officer concerned.
7. Office order file.

  
(FOZIA NAZ)  
SECTION OFFICER (S/F)

**Certified to be  
True Copy**





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Annexure "C"

To

1. The Honorable Chief Secretary, Khyber Pakhtunkhwa.
2. The Honorable Secretary, E&SE Department.
3. The Director, E&SE Khyber Pakhtunkhwa.

Through: - **PROPER CHANNEL.**

Subject: - **DEPARTMENTAL APPEAL AGAINST PRE-MATURE TRANSFER ORDER DATED 03.04.2015.**

Sir,

With due respect and humble submission that I was serving as Principal at GGHS Hassan Zai Charsadda. Later on I submitted an application for transfer to Peshawar being ~~Arbitrarily~~ patient. Accordingly the worthy Secretary E&SE was very kindly transferred me as Principal GHHS Islamia Collegiate University of Peshawar against the vacant post vide notification No. SO(S/F)E&SE/4-16/2015 dated 29.01.2015 (copy enclosed), where I took over the charge on the same day (copy enclosed). After my arrival to the said school I have taken the following steps in the interest of the said school: -

1. Necessary arrangements made on the security points of view of the school i.e. installation of cameras and raising of boundary walls etc.
2. Compile the complete and detailed data of the students enrollments.
3. Issued necessary instructions regarding entry of the outsider/visitors in the schools, to ensure security of the school.
4. Properly updated and maintained the admission and withdrawal registers.
5. Fortnightly meetings were arranged of the teachers to observe the performance of the students.
6. Arrangements made for the installation of electric bells for the smooth running of the institutions, and carried out repair/maintenance work.

Sir, it is astonishing enough that I was again transferred after serving as Head of the said school for about two months and five days vide Notification No. SO(S/F)E&SE/4-16/2015 dated 03.04.2015 (copy enclosed) without any reason.

Sir, the said transferred order is the clear violation of the transfer and posting policy being premature transfer. I, therefore earnestly requested your good honour through this departmental appeal that the transfer of the undersigned may kindly be cancelled so that I may be able to come out from the gulf of uncertainty. I hope my this departmental appeal will be given favour and due consideration.

Dated 06.04.2015

Yours faithfully,



(Surraya Begum)  
Principal Islamia Collegiate  
GHHS University of Peshawar.

  
Certified to be  
True Copy

8A



Most Immediate

PSO TO CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

No. PSO/CS/KPK/I - 9 / 2014

Dated Pesh: the 6<sup>th</sup> April, 2015

To

The Secretary,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa,  
Peshawar.

Subject:- DEPARTMENTAL APPEAL AGAINST PREMATURE TRANSFER,  
DATED 03-04-2015

Dear Sir,

I am directed to forward herewith a departmental appeal, dated 06-04-2015 in respect of Mst. Surraya Begum, Principal Islamia Collegiate, GGHS University of Peshawar with the request to furnish report within 03 x days, positively.

Encl. As above

Yours faithfully,

(CAPT(R) FARRUKH ATTIQUE)  
PSO to Chief Secretary  
Tel: 091-9210355  
Fax: 091-9210447

Certified to be  
True Copy



90

Most Immediate

Amexuxa "D"

**PSO TO CHIEF SECRETARY  
KHYBER PAKHTUNKHWA**

No. PSO/CS/KPK/I-9/2014

Dated Pesh: the 8<sup>th</sup> April, 2015

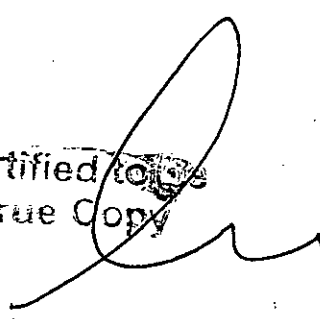
To

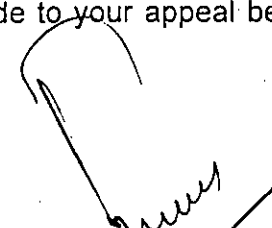
Mst. Surayya Begum,  
Principal,  
GGHS Islamia Collegiate,  
Peshawar.

Subject:- DEPARTMENTAL APPEAL AGAINST PREMATURE TRANSFER,  
DATED 03-04-2015

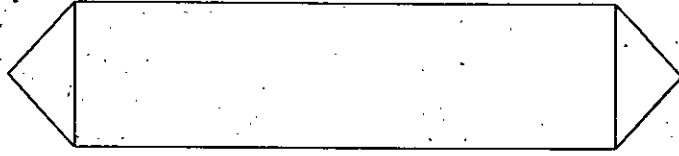
Your appeal, dated 06-04-2015 was referred to Elementary & Secondary Education Department. In response, E&SE department has informed that you are basically Deputy District Education Officer (F) from Management Cadre and were serving as Principal (BS-18) at GGHS Civil Quarters Peshawar. Due to upgradation of the said post to BPS-19 under 4-tier formula, you were adjusted as Principal (BS-18) at GGHS Hassan Zai Charsadda. You were transferred on your own request to GGHS Islamia Collegiate, Peshawar. Meanwhile, Mst. Zohra Bibi, Vice Principal (BS-18) GGHS Begum Shahab ud-din, Peshawar has also requested for her transfer against the said post. Her request was considered and approved by the department on humanitarian grounds as being a mother of blind / ailing daughter, who is student of MA in Arabic Department, University of Peshawar; it was troublesome for her to facilitate her daughter in time due to difference in official and university timings.

2. Department has there/ regretted to accede to your appeal being not based on cogent ground.

  
Certified to be  
True Copy

  
(CAPT(R) FARRUKH ATTIQUE)  
PSO to Chief Secretary  
Tel: 091-9210355  
Fax: 091-9210447

بعذالت سروس ٹریڈیوٹل KPK پشاور



2015ء منجانب  
شریابیلیم بنام چیف سیکٹری وغیرہ

9 اپریل

مورخہ  
مقدمہ  
دعویٰ  
جرم

سروس اپیل

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

آن مقام پشاور  
کلیئے ناہر محمود سید سید محمد حفیظ ایڈووکیٹ صاحب  
اللہ ایڈووکیٹس پشاور

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے  
سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Attested

۶

Accepted

Handwritten signature

2015

9 اپریل

9

المرقوم

Handwritten signature

Handwritten signature

العبد گدگ الواع العبد

کے لئے منظور ہے۔

پشاور

مقام

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

Service Appeal # 305/2015.

Surraya Begum Principal GGHS, Islamia Colligate, Peshawar. ....Appellant  
VERSUS

Secretary E&SE, Department Khyber Pakhtunkhwa & others..... Respondents

Parawise reply Comments for & on behalf of Respondents No.1-3.

**Respectfully Sheweth,  
Preliminary Objections:-**

1. That the instant appeal is badly time barred.
2. That the appellant has got no cause of action/ locus standi.
3. That the appellant has not come to this Hon'able Tribunal with clean hands.
4. That the appeal is not maintainable in its present form.
5. That the appellant has concealed important material facts from this Hon'able Tribunal.
6. That the appellant has filed this appeal with malafide motives.
7. That the instant appeal has been filed to pressurize the respondents.
8. That the present appeal is bad for mis-joinder/non-joinder of necessary parties.
9. That the appellant is not competent to file the instant appeal against the respondents.
10. That the appellant is not entitled for the relief she has claimed.
11. That the order dated 03-04-2015 is legally competent & liable to be maintained.
12. That under Section-10 of the Khyber Pakhtunkhwa Civil Servant Act 1973.  
"Every civil Servant shall be liable to serve any where within the Province, including the appellant.
13. That the civil servant can hold a post during the pleasure of the competent authority.
14. That the appellant want to stick to the post of Principal post and thus pursuing posting of the choice in violation of the provisions, contained in Khyber Pakhtunkhwa Civil Servant Act, 1973 and posting transfer policy of the Provincial Government.
15. That the post of Principal I Provincial Cadre and also not a tenure oriented post.
16. That the appellant has completed her normal tenure.
17. That the appellant is basically from the management cadre.
18. That this Hon'albe Tribunal has got no jurisdiction to entertain the instant service appeal.

30.11.15

## ON FACTS.

1. That Para-1 is incorrect & misleading, the appellant was inducted in the E&SE Department against the post of Deputy Education Officer (Female) in the light of recommendation of the Public Service Commission Peshawar in management care. She has been serving as a Principal BPS-18 at GGHS, Civil Quarter Peshawar Cant; but due to the up-gradation of the said post in the mentioned school from BPS-18 to BPS-19 under the 4-tier formula, the appellant was adjusted as a Principal BPS-18 at GGHS, Hassanzai District Charsadda by the competent authority. The appellant then filed an application for her transfer from GGHS, Hassanzai Charsadda to GGHS, Islamia Colligate Peshawar and order dated 29-01-2015 issued by the Respondent No.2 on the request of the appellant.

However, in the meantime Mst: Zuhra Bibi Vice Principal BS-18 of GGHS, Begum Shahabud Din Peshawar City has filed an application for her transfer to GGHS, Islamia Colligate Peshawar which was accepted by the competent authority on humanitarian grounds as being a mother of a blind/ailing daughter a student of Master in Arabic Department University of Peshawar in order to facilitate her blind daughter in time due to the difference in official and University timings of duty, hence the appellant was transferred & adjusted at GGHS, Begum Shahabud Din Peshawar against the Vice Principal post in BPS-18 in the light of the above mentioned facts & circumstance of the case.


2. That Para-2 is also incorrect & denied on the grounds as mentioned in Para-I of instant reply.
3. That Para-3 is correct that the Respondent No.1 has rejected the departmental appeal of the appellant vide order dated 08-04-2015 in the light of the above mentioned circumstance of the case as agitated in Para-I of the instant reply of the Respondents.


## ON GROUNDS.

- A. That ground A is incorrect & denied. The mentioned order dated 03-04-2015 is legally issued by competent authority in the light of the facts and circumstances of the case, hence is liable to be maintained in favour of the respondents having no question of rules violation in the instant case because the appellant is working against the management cadre post in the E&SE Department & can be posted where over her services are required by the competent authority.
- B. That ground-B is incorrect & not admitted. Detail reply of this Para/ground has been given in para-I & ground A of the instant reply, hence no further comments.

- C. That the ground-C is incorrect and not admitted, reply to this para has been given in ground-A & other paras, hence no further comments.
- D. That ground-D is incorrect and not admitted. The order dated 03-04-2015 is legally issued in public interest & is liable to be maintained in favour of the respondents.
- E. That ground-E is incorrect and not admitted. The statement of the appellant in this para is false, baseless against law, rules, facts manufactured one, without any legal proof & support, based on malafide motives and even against the norms justice. Hence, denied.
- F. That ground F needs no comments, however, the Respondents seek leave of this Hon'able Tribunal to submit additional grounds & record at the time of arguments.
- G. That ground-G is incorrect & denied, the appellant has been treated as per law, rules & policy in the instant case by the Respondents under the discretionary mandate of the relevant provision of Law.

In view of the above made submissions, it is, therefore, most humbly requested that this Honourable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favour of the Respondents Department.

  
Director  
Elementary & Secondary Education,  
Peshawar.

  
Secretary,  
Elementary & Secondary Education,  
Department.

**(For & on behalf of Respondents. 1-2)**

**VAKALATNAMA**

IN THE COURT OF KPK Service Tribunal Peshawar

Appeal No. 305 OF 2015

Suriyya Begum (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

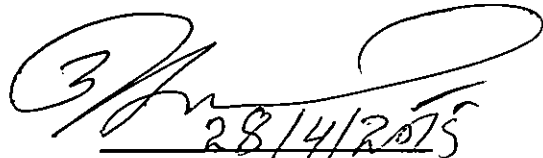
**VERSUS**

Chief Secretary KPK (RESPONDENT)  
(DEFENDANT)

I/We Fuhsra Bibi (Respondent No. 4)

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, 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. \_\_\_/\_\_\_/2015

  
28/4/2015

CLIENT

  
ACCEPTED

**NOOR MOHAMMAD KHATTAK  
(ADVOCATE)**

OFFICE:  
Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.  
Phone: 091-2211391  
Mobile No.0345-9383141



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESAHWAR**

**APPEAL NO. 305/2015**

**SURAYYA BEGUM**

**VS**

**GOVT: OF KPK**

**REPLY ON BEHALF OF RESPONDENT No.4 (Mst:  
ZUHRA BIBI) IN RESPONSE TO THE APPLICATION  
SUBMITTED BY APPELLANT FOR THE GRANT OF  
STATUS QUO**

**R/SHEWETH:**

- 1- That the above mentioned appeal is pending for adjudication before this august Service Tribunal and is fixed for 15.5.2015.
- 2- That this august Tribunal has issued a status quo order on 14.4.2015 in the above noted appeal.
- 3- That the appellant cannot satisfy all the three necessary ingredients under order 39 rule 1 and 2 which is must according to the Supreme Court judgments.
- 4- That as the transfer order has been passed by a proper Government authority; therefor under 56 (d) of Specific Relief Act such orders can not be stayed/suspended.
- 5- That if the stay order dated 14.4.2015 is vacated then the appellant will not suffer irreparable loss.
- 6- That under order 39, rule 2A stay cannot be granted for more than fifteen days.
- 7- That no prior notice of the stay application was given which is also mandatory under section 80 of the Civil Procedure Code 1908.

It is therefore most humbly prayed that on acceptance of this application the stay order issued on 14.4.2015 may very kindly be vacated/set aside.

**RESPONDNET NO.4**

  
**ZUHRA BIBI**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.305\2015

Ms.Surriya Begum.....Appellant

Versus

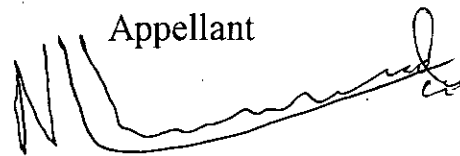
Chief Secretary Govt. of KPK .....Respondents

INDEX

S.No	Description of Documents	Annexure	Pages
1.	Rejoinder with Affidavit		1-3
2.	Reply to Stay Application with Affidavit		4-5
2.	Transfer Orders	A-1,A-2,A-3	6-8
3.	Pay Slips	A-4	9-11
4.	Certificate of Transfer of Charge	A-5	12-13
5.	Explanation and Reply	A-6, A-7	14-15
6.	Application	A-8	16
7.	Medical Prescription	A-9	17-38

Through

Appellant



Nasir Mahmood Advocate,  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.  
Mob.No.0333-9176275

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.305\2015

Ms.Surriya Begum.....Appellant

Versus

Chief Secretary Govt. of KPK and others.....Respondents

Rejoinder to the Para wise comments of the respondent no.1, 2&3 on behalf of appellant

Preliminary Objections;

All the preliminary objections have been taken in routine and all the preliminary objections are wrong and incorrect. The appeal is within time and the appellant has got a cause of action. The appellant has come to this honorable tribunal with clean hands and the appeal is very much maintainable. The appellant has not concealed facts from this honorable tribunal and the appeal has bonafidley been filed. The appeal has been filed by the appellant to safeguard her interest and not to pressurize the respondents. All the necessary parties have been arrayed as respondents. The appellant is competent to file the appeal and is also entitled to the relief claimed. The order impugned is illegal and is liable to be set-aside.

In reply to Preliminary objection no.12&13 it is stated that Provincial Govt. has formulated Transfer and posting which has been trampled by the respondents and the competent authority cannot deviate from the policy.

Preliminary Objections no.14 is wrong and incorrect. The respondents have himself violated the policy.

Preliminary Objections no.15&16 is wrong and incorrect and preliminary objections no.17 needs no rejoinder.

Preliminary Objections no.18 is wrong and incorrect.

ON FACTS:

1. In reply to Para-1 of the comments it is stated that the respondents have narrated half truth before this honorable tribunal. The appellant was posted DDEO (F) at Buner when vide order dated 14.02.2013 she was transferred to Peshawar and her services were placed at the disposal of Directorate E&SE KPK Peshawar. The appellant was thereafter adjusted vide order dated 03.06.2013 against the post of Principal in GGHS Civil Quarter, Peshawar. The appellant was then transferred to GGHS, Hassan Zai Charssada and again vide order dated 29.01.2015 she was transferred to Islamia Collegiate Peshawar thereby making her a rolling stone. The appellant within a short span of three years was five times transferred from one place to another. The appellant is still working in Islamia Collegiate Peshawar. Copy of the orders, pay Slips and Certificate of transfer of the charge is attached as annexure-A-1, A-2, A-3, A-4 and A-5 respectively.

Moreover respondent no.4 on 09.04.15 has broken different locks of the School in absence of the appellant which shows the mighty hands behinds her. The appellant then sought explanation of the same from class-IV employees. Copy of the explanation and reply is attached as annexure-A-6&A-7. The appellant has also brought this occurrence into the notice of the Secretary Education. Copy of the application attached as annexure-A-8.

It may be noted here that there is no ground for transfer of civil servant from one place to another on humanitarian ground however respondent no.4 is mother of step daughter while the appellant is himself **Arthritis patient** and cannot walk without the help of other so the need of the appellant is more then respondent no.4. Copy of the Medical prescription is attached as annexure-A-9.

2. Para-2 of the comments is wrong and incorrect.
3. Departmental appeal of the appellant has wrongly been rejected.

**Grounds:**

- A. Para wise comments of Ground-A is wrong and incorrect and Ground-A of the appeal is reiterated. The respondents have violated the transfer policy and transferred the appellant before the completion of tenure.
- B&C. Para wise comments of Ground-B&C are wrong and incorrect and Ground-B&C of the appeal are reiterated.
- D. Para wise comments of Ground-D is wrong and incorrect and Ground-D of the appeal is reiterated. The impugned order has been passed just to accommodate their blue eyed.
- E. Para wise comments of Ground-E is wrong and incorrect and Ground-E of the appeal is reiterated.
- F. Para wise comments of Ground-F needs no rejoinder.
- G. Para wise comments of Ground-G is wrong and incorrect and Ground-G of the appeal is reiterated.

It is, therefore, respectfully prayed that in the light of facts mentioned above the appeal may be accepted.

Through

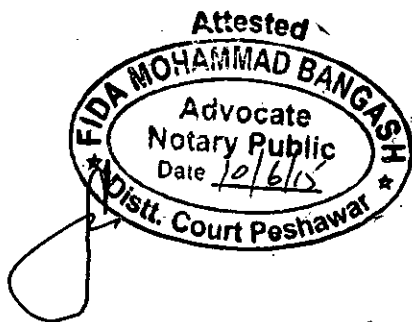
*Sunam*  
Appellant

Nasir Mahmood Advocate  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.

**Affidavit**

I, do hereby declare, and affirm on oath that the contents of accompanying rejoinder are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble tribunal.

*Sunam*  
Deponent



4

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.305\2015

Ms.Surriya Begum.....Appellant

Versus

Chief Secretary Govt. of KPK and others.....Respondents

Rejoinder to the Reply of the stay application of the respondent no.1, 2&3 on behalf of appellant

Preliminary Objections;

All the preliminary objections have been taken in routine and all the preliminary objections are wrong and incorrect. The appeal is within time and the appellant has got a cause of action. The appellant has come to this honorable tribunal with clean hands and the appeal is very much maintainable. The appellant has not concealed facts from this honorable tribunal and the appeal has bonafidley been filed. The appeal has been filed by the appellant to safeguard her interest and not to pressurize the respondents. All the necessary parties have been arrayed as respondents. The appellant is competent to file the appeal and is also entitled to the relief claimed. The order impugned is illegal and is liable to be set-aside.

In reply to Preliminary objection no.12&13 it is stated that Provincial Govt. has formulated Transfer and posting which has been trampled by the respondents and the competent authority cannot deviate from the policy.

Preliminary Objections no.14 is wrong and incorrect. The respondents have himself violated the policy.

Preliminary Objections no.15&16 is wrong and incorrect and preliminary objections no.17 needs no rejoinder.

5

Preliminary Objections no.18 is wrong and incorrect.

ON FACTS:

1. Para-1 of the reply needs no rejoinder.
2. Para-2 of the reply needs no rejoinder. However facts mentioned in para-2 of the stay application is reiterated.
3. Para-3 of the reply is wrong and incorrect and para-3 of the stay application is reiterated.
4. Para-4 of the reply is wrong and incorrect and para-4 of the stay application is reiterated.
5. Para-5 of the reply is wrong and incorrect and para-5 of the stay application is reiterated.

It is, therefore, respectfully prayed that in the light of facts mentioned above the application may be accepted.

Through

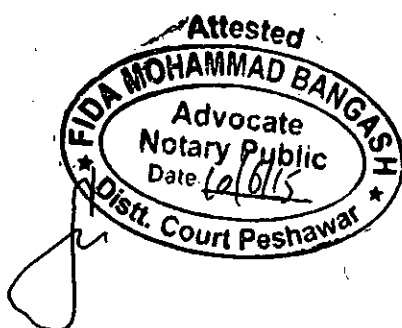
*Sunay*  
Appellant

Nasir Mahmood Advocate  
Supreme Court of Pakistan  
13-D Haroon Mansion Peshawar.

Affidavit

I, do hereby declare, and affirm on oath that the contents of accompanying rejoinder are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble tribunal.

*Sunay*  
Deponent



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SE DEPARTMENT

Dated Peshawar the February, 14, 2013.

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2013/Surriya Begum: The services of Mst. Surriya Begum Deputy District Education Officer (F) (BS18) Bunir are hereby placed at the disposal of Directorate E&SE Khyber Pakhtunkhwa Peshawar immediate effect in the interest of public service.

2. Consequent upon the above, Mr. Raj Muhammad DEO(M) Bunir is hereby allowed to look after the affairs of the post of DEO(F) Bunir till further order.

3. No TA/DA is allowed.

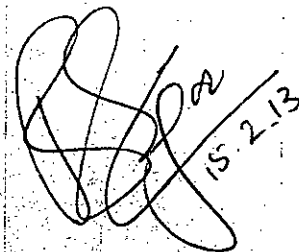
SECRETARY

Endst. of even No & date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. Divisional Education Officer (F) Bunir.
4. District Account Officer Bunir.
5. Incharge EMIS, E&SE Department.
6. P.S to Secretary E&SE Department
7. Officer concerned.
8. Office order file.

**Certified to be  
True Copy**



(BEENISH IMRAN)  
SECTION OFFICER (S/F)



7

Annexure "A2"

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SE DEPARTMENT



Dated Peshawar the June 3, 2013.

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2013/Surraya Begum: Mst. Surraya Begum Ex-DEO (F) (BS-18), District Buner (awaiting posting) is hereby adjusted as Principal (BS-18) GGHS Civil Quarter, Peshawar against the vacant post in the interest of public service with immediate effect.

2. No TA/DA is allowed.

SECRETARY

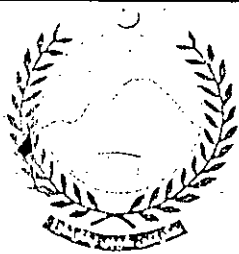
Endst.of even No & date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. District Officer Education (F) Peshawar.
4. Incharge EMIS, E&SE Department.
5. P.S to Secretary E&SE Department.
6. Officer concerned.
7. Office order file.

(BEENISH MIRAN)  
SECTION OFFICER (S/F)

**Certified to be  
True Copy**



GOVERNMENT OF 8  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Annexure "A3"

Dated Peshawar: January 29, 2015.

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2015/Surraya Begum: Ms. Surraya Begum Principal (BS-18) GGHS Hassan Zai, Charsadda is hereby transferred and posted as Principal (BS-18) at GGHS Islamia Collegiate, Peshawar against the vacant post with immediate effect.

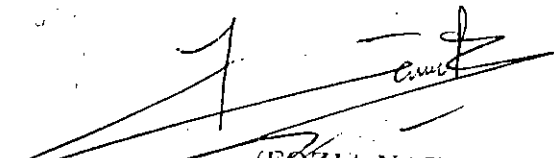
2. No TA / DA allowed.

Endst.of even No & date

SECRETARY

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE, Peshawar.
3. District Education Officer (F) Charsadda & Peshawar.
4. District Accounts Officer Charsadda.
5. Incharge EMIS, E&SE Department.
- ✓ 6. PS to Secretary E&SE Department.
7. Officer concerned.
8. Office order file.

  
(FOZIA NAZ)  
SECTION OFFICER (S/F)

**Certified to be  
True Copy**





# CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that we have on the fore/afternoon of this day respectively made over and receive charge of this office of the Mst. Suraya Begum, B-18 Principal, GHS, Islamia Collegiate Peshawar transfer from GHS, Hassan Bai Charsadda with and to SOCS/FE/SE/4-16/2015/Suraya Begum, dated 29/01/2015.
2. Particulars of cash and important secret and confidential document handed over are noted on the reverses.

Signature of Relived  
 Government Servant. ROSHAN JABEEN  
 SET B-17

Station Peshawar

Signature of Receiving  
 Government Servant. SURAYA BEGUM  
 Principal

Dated 29/01/2015

Office of the Principal, Govt: Girls High School Islamia Collegiate Peshawar

Endst. No. 201

Dated 29/01/2015

Suraya  
 PRINCIPAL  
 G.H.S. Islamia  
 Peshawar

- Copy are forwarded to the:
1. Accountant General, KPK, Peshawar.
  2. Principal/Headmistress concerned.
  3. Principals concerned.
  4. Master File.
  5. Manager, HBL, University Campus Peshawar
  6. Manager, UBL, University Campus Peshawar

Suraya  
 PRINCIPAL  
 G.H.S. Islamia  
 Collegiate Peshawar

**Certified to be True Copy**  
[Signature]

جواب طلبی

بتاریخ

طلبی

آپ کلاس فور ولانڈ میں سے جواب طلبی کیجاتی ہے۔ کہ

مورخہ ۰۹<sup>۰۶</sup>/<sub>۱۵</sub> کو میں اپنے تبارے کے سلسلے میں سرورسٹریٹول

گئی تھی۔ اگلے روز ۱۰<sup>۰۶</sup>/<sub>۱۵</sub> کو جب میں سکول آئی۔ تو میرے آفس میں

وجود سرکاری ریکارڈز، ضروری کاغذات اور مختلف سبکدوشی کی

الحامی کا تالا، آفس ٹیبل کی درواز کا تالا اور سرکاری سبکدوشی کی

تالا ٹوٹے ہوئے تھے اور سکول کا تمام ریکارڈ غیر محفوظ رہا تھا۔

آپ سے جواب طلبی کیجاتی ہے۔ کہ یہ تالے کس کی اجازت سے کھلے اور

کس نے توڑے تھے۔ جبکہ ایس سکول کی ڈائری کی صفحہ ۱۰ میں

جارج کس کو لکھا گیا ہے۔ غیر عوامی سرکاری تالے توڑنا خلاف

قانون ہے۔ اور سرکاری امور میں زبردستی مداخلت کی گئی ہے اور غیر قانونی

کارروائی کی گئی ہے۔

میں روشن رائس ڈائری میں سے التجا ہے۔ کہ یہ آرڈر تمام کلاس فور ولانڈ

پر حکم سجا دیں۔ اور تمام کلاس فور جو شین دن کے اندر تحریری رپورٹ

لکھ کر مباحث کریں۔

۱۴-۶-۱۵

GGHS. PESHAWAR (PRINCIPAL)

Govt. Girls High School  
Islamia Collegiate Peshawar

Certified to be

- ۱:- جہانزیب - جوئر کلر
- ۲:- افتخار - نائب قاصد
- ۳:- معروف خان - جوکیدار
- ۴:- نذر محمد - جوکیدار

۵:- طارق

۶:-

خبرداران اور پرنسپل کے لئے 49415 ...

Annexure "A7"

عنوان Explanations کے جواب

جواب دیا گیا ہے۔ آپ کے سوال کے Explanations کے وصول کے بعد۔ اور اس کو جوابی طور پر دیا گیا ہے۔

1) جناب عالیہ! جس کے آپ سے صبراً کہہ رہے ہیں کہ اس وقت آپ کے آفس میں ...

2) اس کے پرنسپل کے لئے ...

- 1) جناب عالیہ! اس کے پرنسپل کے لئے ...
- 2) جناب عالیہ! اس کے پرنسپل کے لئے ...
- 3) سو ویزا ...
- 4) آفیس میں ...
- 5) ...

Certified to be True Copy



17

Annexure "A-9" پروفیسر

Professor

Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)



ڈاکٹر امجد تقویم کا کاخیل  
گولڈ میڈلسٹ  
ایم بی بی ایس (پشاور)  
ایف سی پی ایس (میڈیسن)  
ایم آر سی پی ایس (آئرلینڈ)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

♀

27/2/19

To whom it may concern

It is certified that Mrs Suraya Begum w/o Professor Abbas Ichan is having Arthritis, she is my patient for last many yrs and requires life long treatment and is not fit for field duty & long travels.

Certified to be True Copy

*[Signature]*

ڈاکٹر امجد تقویم  
M.B.B.S. M.R.C.P. F.C.P.S.  
ایسوسی ایٹ پروفیسر

درد کی گولی کے ساتھ معدے کی دوائی ضرور کھائیں۔

ناغہ بروز ہفتہ، اتوار

Clinic: 29-30 A, Karachi Market, Khyber Bazar Peshawar  
Mob: 0300-5908048 - 0321-9772311



Professor

Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)



Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

پروفیسر  
ڈاکٹر امجد تقویم کاکاخیل  
گولڈ میڈلسٹ  
ایم بی بی ایس (پشاور)  
ایف سی پی ایس (میڈیسن)  
ایم آر سی پی ایس (آئر لینڈ)

Suraya

♀

6/2/15

Fibromyalgia

Rx

Xanax 100

Ms → SA

Aepo 5

Ms → SA + 1/2

Call tree soft

M.com

fenrol

Certified to be  
True Copy  
Am

Ms

Ms

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Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

Surraya

D  
+

27/2/14

AMS  
DA  
EM

Tiboprase  
1 203 x

2 X Bone  
A + C

3 Mepra  
A + C

4 Pseud  
A + C

UT Reading  
A + C

Certified to be  
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Dr 4

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Mob: 0300-5908048 - 0321-9772311

Associate Professor

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(Gold Medalist)



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ایف سی پی ایس (میڈیسن)  
ایم آر سی پی ایس (آنر لینڈ)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Associate Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

f

24/4/13

Mr. / Mrs. / ...?

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درد کی گولی کے ساتھ معدے کی دوائی ضرور کھائیں

ناغذ بروز ہفتہ، اتوار

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Mob: 0300-5908048 - 0333-9389085

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Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)



ایسوسی ایٹ پروفیسر

ڈاکٹر امجد تقویم کاکاخیل

گولڈ میڈلسٹ

ایم بی بی ایس (پشاور)

ایف سی پی ایس (میڈیسن)

ایم آر سی پی ایس (آئرلینڈ)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Associate Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

کلی

♀

۱۵/۸

GA

Captain  
Fairuz  
Khan  
3-0

Certified to be  
True Copy

درد کی گولی کے ساتھ معدے کی دوائی ضرور کھائیں

ناغہ بروز ہفتہ، اتوار

نوٹ: صبح 9:00 بجے سے شام 6:00 بجے تک نمبر حاصل کریں۔

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Associate Professor

Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)



22

ایسوسی ایٹ پروفیسر

ڈاکٹر امجد تقویم کا کاخیل

گولڈ میڈلسٹ

ایم بی بی ایس (پشاور)

ایف سی بی ایس (میڈیسن)

ایم آری بی ایس (آنر لینڈ)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Associate Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

♀  
35y

△ PM

4/7/13

Fibroids

Prolex

< 1 1/2

Alp 0.25 X

1/2 - 1/2

- Colair (calber) 2-2

Lawsoloc

1-1

X Bone 0.5ug X

ع ①

S/R

ob ②

Certified to be True Copy

CP  
ESR  
SGPT // Sugar  
Creatinin

درد کی گولی کے ساتھ معدے کی دوائی ضرور کھائیں

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(Gold Medalist)



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گولڈ میڈلسٹ

ایم بی بی ایس (پشاور)

ایف سی پی ایس (میڈیسن)

ایم آری پی ایس (آئرلینڈ)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Associate Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

Surgeon

♀

29/1/2000  
2

Son R  
Far

ARTER ER 200

1st

Paracetamol  
2000

Paracetamol

2000

Paracetamol

Mr  
Sp  
ER

Certified to be  
True Copy

Handwritten signature

درد کی گولی کے ساتھ معدے کی دوائی ضرور کھائیں

ناغہ بروز ہفتہ، اتوار

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(Gold Medalist)



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ایسوسی ایٹ پروفیسر

ڈاکٹر امجد تقویم کا کاخیل

گولڈ میڈلسٹ

ایم بی بی ایس (پشاور)

ایف سی پی ایس (میڈیسن)

ایم آری پی ایس (آئرلینڈ)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Associate Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

♀

19/3/13

Amjad  
FM

148/105

Metformin  
1000

Metformin  
1000

Metformin  
1000

Renin Inhibitor / ACE Inhibitor  
1000

SANCOBROW  
1000

ASPIRIN  
1000

Certified to be  
True Copy

(G & R)

درد کی گولی کے ساتھ معدے کی دوائی ضرور کھائیں

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6

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Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)



Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Associate Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

98

ایسوسی ایٹ پروفیسر

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گولڈ میڈلسٹ

ایم بی بی ایس (پشاور)

ایف سی پی ایس (میڈیسن)

ایم آری پی ایس (آئر لینڈ)

URRATA ♀

9/7/22

IRBRO

1 AIRTAL  
1-1-1

2 MOKUP  
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3. Pseudoc  
1-1-1

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درود کی گولی کے ساتھ معدے کی دوائی ضرور کھائیں

ناغہ بروز ہفتہ، اتوار

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ایم بی بی ایس (پشاور)  
ایف سی بی ایس (میڈیسن)  
ایم آر سی پی ایس (آئر لینڈ)

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10

درد کی گولی کے ساتھ معالجے کی دوائی ضرور کھائیں

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Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

ایم بی بی ایس (پشاور)  
ایف سی پی ایس (میڈیسن)  
ایم آر سی پی ایس (آئر لینڈ)

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F.C.P.S. (Pak) MRCP (Ireland)

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Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

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گولڈ میڈلسٹ  
ایم بی بی ایس (پشاور)  
ایف سی پی ایس (میڈیسن)  
ایم آر سی پی ایس (آئرلینڈ)

19/1/19

Fibromyalgia  
G.S.  
— NA Responding

R

1 Zeezap 78  
Q.S. - 10

2 Lecozib  
Q.S. - 20  
3 fentanyl Ectas  
Q.S. - 10  
4 Prevacid 30  
Q.S. - 10

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Associate Professor

Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)



ایسوسی ایٹ پروفیسر

ڈاکٹر امجد تقویم کا کاخیل

گولڈ میڈلسٹ

ایم بی بی ایس (پشاور)

ایف سی پی ایس (میڈیسن)

ایم آر سی پی ایس (آنر لینڈ)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Associate Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

85.

Fr

28/1/19

Fibromyalgia  
OA

R

1. Zeeqyp 50

2. Braxican 20

1. Leg 1+1

3. Fenibroc 40

vb. - 1-1

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درد کی گولی کے ساتھ معدے کی دوائی ضرور رکھائیں

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ایف سی پی ایس (میڈیسن)  
ایم آر سی پی ایس (آئر لینڈ)

دب

ف 1

27/5/22

Fibromyalgia

- 1 Zuclopax 75  
1/3 - 1/2
- 2 ...
- 3 ...
- 4 Relaxapax 50  
1/3 - 1/2
- 5 ...

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Mob: 0314-9081509 - 0300-5908048 - 0333-9389085

Assistant Prof.

Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)

Mob: 0304-9081509  
Mob: 0333-9389085  
Mob: 0300-5908048

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Assistant Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

SS

♀

16142

FRANKLYN  
OA.

Rx

- 1 Zeeqap 50
- 2 72/2x | 4/2x
- 3 1ans 1p 30

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*[Signature]*

*[Signature]*

3

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Assistant Prof.

Mob: 0304-9081509  
Mob: 0333-9389085  
Mob: 0300-5908048

Dr. Amjad Taqweem Kakakhail  
(Gold Medalist)

Physician & Rheumatologist  
F.C.P.S. (Pak) MRCP (Ireland)

Assistant Professor Medicine  
Post Graduate Medical Institute  
Lady Reading Hospital Peshawar.

Mrs. Saeed

7/35

1075/3

FIBROMYALGIA

- 1 Tensional  
vib 3920
- 2 VASCO 20  
L-100
- 3 SANA 20  
L-100

Long Rx  
Knee  
erect  
up  
L-100

10

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*(Signature)*

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Mob: 0304-9081509 - 0300-5908048 - 0333-9389085

# New Al-Hilal

MEDICAL LABORATORY

Quality Lab Service  
For Diagnostic Tests

Patient Name : SUREYA Date : 24/4/2013 12:59 PM  
Sex : Female Referred By : Dr. AMJID TAQWEEM  
Age : ?-Year Lab No : 2026  
Test Required : CBC,ESR,RBS Specimen : EDTA Blood+SERUM

Clinical Hematology:

Test	Result	Units	Normal Value
Hemoglobin	12.3	G/dl	M:14 - 18 F: 12-16
TLC (Total Leucocytes Counts)	7.400	/cmm	4,000 - 11,000
<u>DLC (Differential Leucocytes Count)</u>			
Neutrophils	67	%	40 ----- 70
Lymphocytes	30	%	20 ----- 40
Eosinophils	02	%	02 ----- 05
Monocytes	01	%	02 ----- 08
ESR (Erythrocyte sedimentation Rate)	65	mm/1 <sup>st</sup> Hour	02 --- 15

CHEMESTREY

Test	Result	Units	Normal Value
Glucose Random	75	Mg/dl	70 ---- 150

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**Dr.Fazle-e-Haq**

M.B.B.S Peshawar  
D.C.P Karachi

**Gul Habib**

M.Sc Micro Biology  
M. Phil Micro Biology  
Quid-e-Azam University  
Islamabad.

**M.Tariq Gui**

D.M.L.T (N.L.S) Islamabad  
C.M.L.T. Peshawar  
Consultant Pathology Technician  
L.R.H Peshawar

**Mr. M. Kamran**

D.M.L.T (C Path) Med, Faculty (KPK)  
Consultant Pathology Technician  
L.R.H Peshawar.



34

# New Al-Hilal

MEDICAL LABORATORY

Quality Lab Service  
For Diagnostic Tests

Patient Name : SUREYA Date : 4/7/2013 1:43 PM  
Sex : Female Referred By : Dr. AMJID TAQWEEM  
Age : ?-Year Lab No : 2020  
Test Required : CBC,ESR Specimen : EDTA Blood

### Clinical Hematology:

Test	Result	Units	Normal Value
Hemoglobin	11.3	G/dl	M::14 - 18 F: 12-16
TLC (Total Leucocytes Counts)	7.400	/cmm	4,000 - 11,000
DLC (Differential Leucocytes Count)			
Neutrophils	65	%	40 ----- 70
Lymphocytes	32	%	20 ----- 40
Eosinophils	02	%	02 ----- 05
Monocytes	01	%	02 ----- 08
ESR (Erythrocyte sedimentation Rate)	55	mm/1 <sup>st</sup> Hour	02 ---- 15

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**Dr. Fazole-e-Haq**  
M.B.B.S Peshawar  
D.C.P Karachi

**Gul Habib**  
M.Sc Micro Biology  
M. Phil Micro Biology  
Quid-e-Azam University  
Islamabad.

**M. Tariq Gul**  
D.M.L.T (N.I.H) Islamabad  
C.M.L.T. KPK Peshawar.  
Consultant Pathology Technician  
L.R.H Peshawar.

**Mr. M. Kamran**  
D.M.L.T (C Path) Med, Faculty (KPK)  
Consultant Pathology Technician  
L.R.H Peshawar.

Add: karachi Market 1st Floor, Room.28 Peshawar.Mob:0307-7499842

35

# New Al-Hilal

MEDICAL LABORATORY

Quality Lab Service  
For Diagnostic Tests

Patient Name	: SUREYA	Date	: 29/5/2013 1:53 PM
Sex	: Female	Referred By	: Dr. AMJID TAQWEEM
Age	: ?-Year	Lab No	: 2020
Test Required	: CBC,ESR	Specimen	: EDTA Blood

**Clinical Hematology:**

Test	Result	Units	Normal Value
Hemoglobin	12.1	G/dl	M::14 – 18 F: 12-16

TLC (Total Leucocytes Counts)	6.900	/cmm	4,000 – 11,000
-------------------------------	-------	------	----------------

**DLC (Differential Leucocytes Count)**

Neutrophils	60	%	40 ----- 70
Lymphocytes	36	%	20 ----- 40
Eosinophils	02	%	02 ----- 05
Monocytes	02	%	02 ----- 08

ESR (Erythrocyte sedimentation Rate)	60	mm/1 <sup>st</sup> Hour	02 --- 15
---	----	-------------------------	-----------

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*[Signature]*

**Dr.Fazle-e-Haq**

M.B.B.S Peshawar  
D.C.P Karachi

**Gul Habib**

M.Sc Micro Biology  
M. Phil Micro Biology  
Quid-e-Azam University  
Islamabad.

**M.Tariq Gul**

D.M.L.T (N.I.H) Islamabad  
C.M.L.T. K.P.K Peshawar.  
Consultant Pathology Technician  
L.R.H Peshawar.

**Mr. M. Kamran**

D.M.L.T (C Path) Med. Faculty (KPK)  
Consultant Pathology Technician  
L.R.H Peshawar.

Add: karachi Market 1st Floor, Room.28 Peshawar.Mob:0307-7499842

**POST GRADUATE MEDICAL INSTITUTE**  
Govt. Lady Reading Hospital, Peshawar.



**PATHOLOGY DEPARTMENT**  
Ph: 091-9211430-49, Ext. 3246

Name ..... Suwayy ..... Age ..... Sex .....  
Ward/OPD: ..... Bed No. ....  
Poor/Ent/Receipt No: Free ..... Lab No. ....  
Test Required: RA Factor ..... Dated: 6/9/14 .....

01 WIDAL AGGLUTINATION TEST:

To ..... Ao ..... Bo .....  
Th ..... AH ..... BH.....

02 BRUCELLA AGGLUTINATION TEST:

B. Abortus ..... B. Melitensis .....

Certified to be  
True Copy  
*[Signature]*

03 Rheumatoid Factor:  
(Method-Latex Agglutination)

**Negative**

ANF/Anti DNA: .....  
(Method-Latex Agglutination)

05 ASO Titre: ..... (Normal Range: < 200 iu/ml)  
(Method-Latex Agglutination)

06 TOXOPLASMOSIS: .....  
(Method-Latex Agglutination)

07 C-Reactive Protein: .....  
(Method-Latex Agglutination)

08 RPR/VDRL: .....  
(Method-Latex Agglutination)

09 Echinococcus G: .....  
(Method-Latex Agglutination)

10 Infectious Mononucleosis: .....  
(Method-Latex Agglutination)

Date: .....

11 Pregnancy Test (Undiluted): .....  
(Method-Latex Agglutination)

12 Pregnancy Test (In dilutions): .....  
(Method-Latex Agglutination)

Remarks/Opinion: .....

*[Signature]*  
Chief Technician / Technician

Microbiologist / Immunologist

**POST GRADUATE MEDICAL INSTITUTE**  
Govt. Lady Reading Hospital, Peshawar.



**PATHOLOGY DEPARTMENT**  
Ph: 091-9211430-49, Ext. 3247

**CHEMICAL PATHOLOGY**

Name ..... Surayya ..... Age ..... Sex ..... F  
 Ward/OPD: ..... P. Fee ..... Bed No. ....  
 Poor/Ent/Receipt No: ..... Lab No. 92  
 Test Required: ..... LFT, RFT, RBS, U. Acid. ..... Dated: 06-9-14.

TEST	RESULT	REF. RANGE	TEST	RESULT	REF. RANGE
Glucose Fasting		60 - 115 mg/dl	Total Protein		6.0 - 8.0 g/dl
Glucose 2 Hrs ABF		60 - 140 mg/dl	Albumin		3.8 - 5.1 g/dl
Glucose Random	<u>114</u>	65 - 155 mg/dl	Globulin		1.7 - 3.7g/dl
Glycated HbA <sub>1c</sub>		Normal: 6.5 - 8.0 %	A/G Ratio		1.5 - 2.7
		Diabetic:	CPK		24 - 195 U/l
		Good Control: 5.5-6.8%	CK - MB		Up to 25 U/l
		Fair Control: 6.8-7.6%	AST (SGOT)		Up to 35 U/l
Poor Control: > 7.6%		LDH		Up to 490 U/L	
Urea	<u>14</u>	20 - 40 mg/dl			Desirable < 200 mg/dl Borderline high 200 - 239mg/dl High >240 mg/dl
Creatinine	<u>0.64</u>	0.6 - 1.3 mg/dl	Total Cholesterol		
Sodium		135 - 140 mmol/l	Triglycerides		Up to 200 mg/dl
Potassium		3.4 - 5.5 mmol/l	HDL - Cholesterol		> 35 mg/dl
Uric Acid	<u>7.3</u>	M: 3.5 - 7.2 mg/dl F: 2.6 - 6.0 mg/dl	LDL - Cholesterol		< 130 mg/dl
Bilirubin (Total)	<u>0.2</u>	0.2 - 1.1 mg/dl	Phosphorus		Adult: 2.5 - 5.0 mg/dl Children: 4.0 - 7.0 mg/dl
Bilirubin (Direct)	<u>0.1</u>	up to 0.25 mg/dl	Calcium		8.0 - 10.5 mg/dl
Bilirubin (Indirect)		mg/dl	Acid Phosphatase		M: up to 5.4 U/l F: up to 4.2 U/l
ALT (SGPT)	<u>23</u>	Upto 42 U/L	Amylase		35 - 140 U/l
Alkaline Phosphatase	<u>93</u>	Adult :98 - 306 U/l Child: 250-630 U/L	Lithium		Therapeutic Range 0.6 - 1.2 mmol/l
Gamma - GT		M: 11 - 61 U/L F: 09 - 39 U/L			

REMARK: .....

BIOCHEMIST

*[Handwritten Signature]*

**Certified to be True Copy**

*[Handwritten Signature]*

CHEMICAL PATHOLOGIST

POST GRADUATE MEDICAL INSTITUTE  
Govt. Lady Reading Hospital, Peshawar.



PATHOLOGY DEPARTMENT  
Ph: 091-9211430-49, Ext. 3248

**HAEMATOLOGY**

Name Surajger Age ..... Sex .....  
Ward/OPD: ..... Bed No. ....  
Poor/Ent./Receipt No: Fm Lab No. ....  
Test Required: FBC e ESR Dated: 06-09-14

**BLOOD SMEAR REPORT**

Hb... 11.6 g/dl (Normal 14 -18) Total RBC Count: ..... Million/cmm (Normal 4.5-5.5)  
Hct. .... % (Normal 39-52) MCV .....fl (Normal 78-96), MCH .....pg (Normal 27-32)  
MCHC .....g/dl (Normal 32-36) TLC : 6:600 / 2 ..... /cmm (Normal 4000-11000)

**Differential Leucocyte Count (DLC):**

Neutrophils: 50 % Lymphocytes: 46 % Monocytes: 02 %  
Eosinophils: 02 % Basophils: ..... % Band: ..... %  
Metamyelocytes: ..... % Myelocytes: ..... % Promyelocytes: ..... %  
Blasts: ..... % Normoblast: ..... / 100 WBC

Platelet count: 20 8000 /Cmm (Normal 150,000-450,000) ESR: 55 mm at end of 1st hr.

RBC Morphology: .....

Reticulocytes count: ..... %, Haemoparasites: .....

Sickling Test: ..... Hb.F with acid Elution .....

Bleeding Time: ..... Clotting Time: .....

OPINION/COMMENTS: .....  
Certified to be True Copy

Medical Technologist / Technician

29

Haematologist

Before the court of service tribunal KPk. Peshawar.

MST: Surrang Begum

vers

Govt

15/7/2015

Application for Adjournment of Instant case.

Respectfully sheweth:

1) That the above noted appeal is pending before this honourable tribunal and is fixed for today.

2) That Senior counsel of appellant is appearing before the August Supreme Court Islamabad in CP NO: 800/2015 titled "Habibullah Wajir vs SMBR"

3) That it would be in the interest of justice that the appeal may kindly be adjourned to any other date, convenient to this honourable tribunal.

It is therefore respectfully prayed that on acceptance of this application, the case may kindly be adjourned to some other date.

Applicant

Dated: 15/7/15

through Syed. Abdul Hafiz  
Advocate

15/7/15

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1753 ST

Dated 6 / 11 / 2015

To

The Secretary,  
E&SE,  
Peshawar.

Subject: - Judgment

I am directed to forward herewith a certified copy of Judgment dated 2.11.2015 passed by this Tribunal on the above subject for strict compliance.



REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.