

Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	22.03.2016	<p data-bbox="523 504 1369 542"><u>BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR</u></p> <p data-bbox="751 624 1059 662">Appeal No. 979/2015</p> <p data-bbox="523 703 1329 782">Muhammad Nasir Khan Versus Govt. of KPK through Secretary; Local Govt. &amp; Rural Dev. Deptt. Peshawar etc.</p> <p data-bbox="620 861 809 899"><u>JUDGMENT</u></p> <p data-bbox="620 980 1374 1019"><u>PIR BAKHSH SHAH, MEMBER.</u>- Appellant with</p> <p data-bbox="523 1059 1374 1258">counsel (Mr. Bilal Ahmad Kakaizai, Advocate) and Senior Government Pleader (Mr. Usman Ghani) for the respondents present.</p> <p data-bbox="523 1350 1374 2028">2. According to record, appellant, an office Assistant, was transferred from the office of Assistant Director, Local Government &amp; Rural Development Department, Hangu to Kohat vide order dated 30.6.2014; again transferred from Kohat to Hangu vide order dated 10.7.2012, and once again for third time transferred to Kohat vide impugned order dated 18.8.2015.. His departmental appeal was also rejected vide order dated 04.09.2015, hence this appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p> <p data-bbox="523 2119 1145 2158">3. Arguments heard and record perused.</p> <p data-bbox="523 2249 1374 2372">4. The learned counsel for the appellant submitted that the impugned transfer order is the result of naked political</p>

interference and pressure of the local MPA namely Mr. Shah Faisal Khan, PK-42, Hangu which is evident from letter dated 11.08.2015 issued from the Chief Minister Secretariat. Copy of this letter is available on the file. He further submitted that the impugned order was not passed in public interest which cannot be maintained. Reliance was placed on 2004-PLC (C.S)1036, 2007-SCMR-599 and 2009-SCMR-390. He requested that the appeal may be accepted and the impugned order set aside.

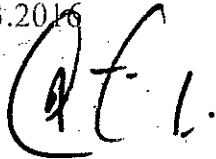
5. The learned Senior Government Pleader resisted the appeal by submitting that the local MPA had requested the quarter concerned for transfer of the appellant in the public interest, He further submitted that no blue eyed chap has been transferred against the post of the appellant. He defended the impugned order and submitted that the appeal may be dismissed.

6. After perusal of the record and hearing pro & contra arguments, it revealed that the impugned order is the result of political interference. Frequent transfer orders of the appellant between Kohat and Hangu within a short span of a few days also cannot be justified. The Tribunal is of the opinion that the impugned order was not passed keeping in view the rules and policy of the government, therefore, it cannot be called a transfer order passed in public interest. Hence, the Tribunal is constrained to set aside the impugned transfer orders dated 18.08.2015 and 04.09.2015. The same

are set aside. The competent authority is however, at liberty that he may pass transfer order even of the appellant strictly on merits in the public interest and in accordance with posting/transfer policy and not under any political influence and interference. The appeal is allowed accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

22.03.2016



(ABDUL LATIF)  
MEMBER



(PIR BAKHSH SHAH)  
MEMBER

15.02.2016

Appellant in person and Addl: AG for respondents present. Arguments could not be heard due to learned Member (Executive) is on official tour to Abbotabad. Therefore, the case is adjourned to 22.3.16 for arguments. The restraint order shall continue.



  
MEMBER

15-2-2016

10.11.2015

Appellant in person and Mr. Abdul Muneeb, Supervisor alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 2.12.2015 before S.B. The restraint order shall continue.

  
Chairman

02.12.2015

Appellant in person and Mr. Mujahid Khan, Progress Officer alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 12.1.2016. The restraint order shall continue.

  
Chairman

~~12.01.2016~~

12.01.2016

~~Counsel for the appellant and Addl: A.G for respondents present. Counsel for the appellant and Addl: A.G for respondents present. Rejoinder submitted copy whereof handed over to learned Addl: A.G. The learned Member (Executive) is on official tour to Swat therefore, Bench is incomplete. To come up for arguments on 15-2-16. The restraint order shall continue.~~

  
MEMBER

11.09.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Assistant (BPS-16) in the office of Director, LG & RDD, Hangu when transferred to the office of Assistant Director, LG & RDD, Kohat vide impugned order dated 18.8.2015 regarding which he preferred departmental appeal on 25.8.2015 which was rejected on 4.9.2015 and hence the instant service appeal on 7.9.2015.

That the impugned transfer order was not made in the interest of public service and was based on the political intervention as evident from original order copy endorsed to Section Officer-IV C.M Secretariat, Khyber Pakhtunkhwa as well as letter of local MPA dated 11.8.2015. Additionally the impugned transfer order is premature as the appellant was appointed against the said post vide order dated 10.7.2015 and transferred within a span of almost 38 days.

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 2.10.2015 before S.B. Notice of stay application be also issued for the date fixed. Till then the impugned transfer order is suspended.

  
Chairman

02.10.2015

Appellant in person and Mr. Abdul Munim Khan, Supervisor alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 10.11.2015 before S.B. Status-quo be maintained.

  
Chairman

Appellant Deposited  
Security & Process Fee





FORM-A

FORM OF ORDER SHEET

Court \_\_\_\_\_

Case No. 979/2015

	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	07.09.2015	<p>The appeal of Mr. Muhammad Nasir Khan presented to-day by Mr. Bilal Ahmad Kakaizai, Advocate, may be entered in the institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2.	11-9-15	<p>This case be put up before the S.Bench for preliminary hearing on <u>11-9-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No: 979 / 2015

MUHAMMAD NASIR KHAN VS Government of KPK etc.

**I N D E X**

DESCRIPTION OF DOCUMENTS		PAGE NO:
<i>Memo of Service Appeal</i>		<i>1 - 4</i>
<i>Affidavit</i>		<i>5</i>
<i>Addresses Sheet</i>		<i>6</i>
<i>Application for Interim Relief along with Affidavit</i>		<i>7 - 8</i>
<b>Annexure-A</b>	Transfer Order dated 30.06.2014.	<i>9</i>
<b>Annexure-B</b>	Office Order dated 10.07.2015.	<i>10</i>
<b>Annexure-C</b>	Impugned Order dated 18.08.2015.	<i>11</i>
<b>Annexure-D</b>	Departmental Appeal / Representation dated 25.08.2015.	<i>12 - 14</i>
<b>Annexure-E</b>	Impugned Appellate Order dated 04.09.2015.	<i>15</i>
<b>Annexure-F</b>	Medical Documents of father of the Appellant.	<i>16 - 40</i>
<b>Annexure-G</b>	Application under Right to Information along with letters	<i>41-43</i>
Wakalatnama		

Appellant,

Through:

*Bilal Ahmad Kakaizai*  
**BILAL AHMAD KAKAIZAI**  
(Advocate, Peshawar)



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

Service Appeal No: 979 / 2015

**K.P. Province  
Service Tribunal  
Diary No 1031  
dated 7-9-15**

**MUHAMMAD NASIR KHAN,**  
Assistant,  
O/o Assistant Director LG&RDD,  
Hangu,

..... **APPELLANT**

**VERSUS**

1. **GOVERNMENT OF KHYBER PAKHTUNKHWA,**  
Through Secretary Local Government Elections & Rural  
Development Department, Peshawar.
2. **DIRECTOR GENERAL,**  
Local Government & Rural Development Department, Peshawar.
3. **ASSISTANT DIRECTOR,**  
Local Government & Rural Development Department, Hangu.
4. **ASSISTANT DIRECTOR,**  
Local Government & Rural Development Department, Kohat.

*[Handwritten signature]*  
7/9/15

..... **RESPONDENTS**

**APPEAL UNDER SECTION 4 OF SERVICE TRIBUNALS ACT, 1974 AGAINST  
IMPUGNED ORDER NO. DIRECTOR(LG)/3-4/POSTING/TRANSFER/  
2014/3616 DATED 18.08.2015 & IMPUGNED APPELLATE ORDER NO.  
DIRECTOR(LG)/3-4/POSTING/TRANSFER/ 2013/3646 DATED 04.09.2015  
ISSUED BY RESPONDENT NO. 2 WHEREBY APPELLANT HAS BEEN  
TRANSFERRED FROM THE OFFICE OF ASSISTANT DIRECTOR LG&RDD,  
HANGU TO THE OFFICE OF ASSISTANT DIRECTOR LG&RDD, KOHAT.**

PRAYER: That, on acceptance of this Service Appeal the Impugned Order as well as Impugned Appellate Order be set-aside being against the law / rules & Appellant be allowed to perform his duties at Hangu with such other relief as may deem fit in the circumstances of the case may also be granted.

*Respectfully Sheweth,*

Short facts, giving rise to present Service Appeal, are as under:

1. That, Appellant was appointed as Assistant in the Respondent's Department in the year 2012.
2. That, Appellant was performing his duties in the office of the Respondent No. 3 when on 30.06.2014, he was transferred to the office of Respondent No. 4, copy of the Transfer Order dated 30.06.2014 is attached as Annexure A. It is important to mention here that the said Transfer Order was infected with melafides / and personal interests of political authorities hence the Appellant agitated his lawful grievance before the Competent Authority.
3. That, after a lapse of about one year, the Competent Authority, while considering the genuine plea of the Appellant, transferred him back to office of the Respondent No. 3, copy of the Office Order dated 10.07.2015 is attached as Annexure B.
4. That, once again, within a span of 40 days, on the directions of political authorities, Impugned Order dated 18.08.2015 is issued whereby Appellant has been transferred to the office of the Respondent No. 4, copy of the Impugned Order is attached as Annexure C.
5. That, against the Impugned Order, Appellant preferred his Departmental Appeal before the Competent Authority which as rejected vide Impugned Order dated 04.09.2015, copy of the Impugned Appellate Order and Departmental Appeal / Representation is attached as Annexure D & E. Hence, this Service Appeal on the following amongst other grounds: -

GROUNDS:

1. That, the Impugned Order as well as Impugned Appellate Order is illegal, unlawful, void and ineffective.
2. That, the same is against the principles of Natural Justice, also.
3. That, Appellant was transferred and posted from the office of Assistant Director, LG&RDD, Kohat to the office of Assistant Director LG&RDD Hangu vide Order dated 10.07.2015 and without observing the codal formalities he is once again displaced by the Respondents without any reason or justification.
4. That, within a span of 40 days, Appellant has, once again, been transferred to Kohat without following the law and the procedure and instructions of ESTACODE etc.
5. That, Appellant has been made a rolling stone between the office of the Assistant Director Hangu and Kohat.
6. That, no reason whatsoever has been mentioned / shown in respect of frequent transfer orders of the Appellant. It is important to mention here that Appellant is involved in any malpractices nor any complaint or inquiry is pending against him.
7. That, keeping in view the deteriorating health condition of the father of the Appellant; he may not be able to proceed again to Kohat. It is worth to mention here that Appellant faced many hardships when he brought his ailing father from Kohat last month, copies of the Medical Documents of father of the Appellant are attached as Annexure-F.
8. That, once again resettlement of the Appellant and his family in Kohat will not be as easy as the subject mentioned Order has been issued by the office with single stroke of pen.
9. That, even otherwise the post of Assistant in the office of the Assistant Director Hangu is still lying vacant and nobody has been ordered to be posted in place of the Appellant.
10. That, Appellant belongs to an average family having no enmity or friendship with any forces (political or non-political) in the locality.
11. That, the Transfer Order has apparently been issued on the recommendations of political personalities and as per information

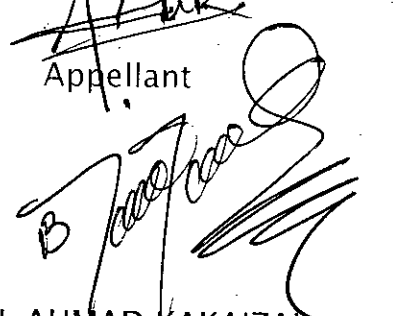
of the Appellant, huge pressure was exerted by the political authorities, in this respect.

12. That, it is evident from the perusal of the subject Transfer Order, that the same has been issued on the whims and wishes of political and influential persons in order to accommodate someone blue eyed. It is important to mention here that the directions of the Political Authority as well as Chief Minister House was sent to the Department vide Section Officer Letter No. SO-IV, / CMS / LG / 2015 / 10560 -61 dated 11/08/2015, but the same has not been provided to the Appellant however Appellant, as per law, has submitted an Application under Right to Information Act, 2014, for provision of information to him, copy of the documents provided to the appellant along with application under RTI are attached as Annexure G.
13. That, the Transfer Order as issued is based on melafide intentions and the instructions and directions as given in the Posting / Transfer policy governing the Province are being violated.
14. That, the Impugned Order as well as Impugned Appellate Order was passed without showing any reason or justification, hence the same is violative of section 24-A of General Clauses Act.
15. That, Appellant has been pre-maturely transferred from one station to another.

It is, therefore, requested that Service Appeal of the Appellant be accepted as prayed for.

  
Appellant

Through:

  
BILAL AHMAD KAKAIZAI  
(Advocate, Peshawar)

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

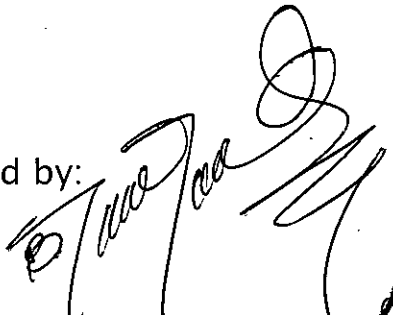
Service Appeal No: \_\_\_\_\_ / 2015

MUHAMMAD NASIR KHAN VS Government of KPK etc.

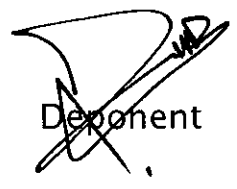
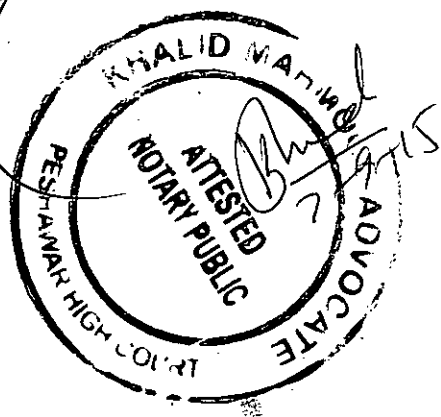
**AFFIDAVIT**

I, MUHAMMAD NASIR KHAN, Assistant, O/o Assistant Director LG&RDD, Hangu, Appellant, do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.

Identified by:



**BILAL AHMAD KAKAIZAI**  
(Advocate, Peshawar)

  
Deponent

6

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

Service Appeal No: \_\_\_\_\_ / 2015

MUHAMMAD NASIR KHAN VS Government of KPK etc.

**ADDRESSES OF PARTIES.**

**APPELLANT:**

MUHAMMAD NASIR KHAN,  
Assistant, O/o Assistant Director LG&RDD, Hangu,

**RESPONDENTS:**

- 1) Government of Khyber Pakhtunkhwa, through Secretary Local Government Elections & Rural Development Department, Peshawar.
- 2) Director General, Local Government & Rural Development Department, Peshawar.
- 3) Assistant Director, Local Government & Rural Development Department, Hangu.
- 4) Assistant Director, Local Government & Rural Development Department, Kohat.

Appellant

Through:

  
BILAL AHMAD KAKAIZAI  
(Advocate, Peshawar)

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

Service Appeal No: \_\_\_\_\_ / 2015

MUHAMMAD NASIR KHAN VS Government of KPK etc.

**APPLICATION FOR INTERIM RELIEF FOR SUSPENSION OF IMPUGNED**  
**TRANSFER ORDER DATED 18.08.2015 TILL THE DISPOSAL OF MAIN**  
**APPEAL.**

Respectfully Sheweth,

1. That, the subject mentioned Appeal has been filed by the Appellant / Applicant in which no date has yet been fixed.
2. That, the contents of the main Appeal may please be read as integral part of this Application.
3. That, from the perusal of Impugned Order dated 18.08.2015, it is crystal clear that the act of the Respondents is pregnant with the melafides and is otherwise has been issued on the whims and wishes of the political authrities.
4. That, till date Applicant / Appellant has not yet relinquish the charge of the post of Assiatnt in Hangu nor the Department has relived him.
5. That, the Applicant / Appellant has got prima facie case in his favour, therefore balance of convenience lies in his favour.

6. That, Applicant / Appellant will suffer irreparable loss if the Impugned Order is acted upon moreover the object of the main Appeal may also fail.

It is, therefore, requested that till the disposal of main Appeal the Impugned Order dated 18.08.2015 be suspended till the decision of main Appeal.

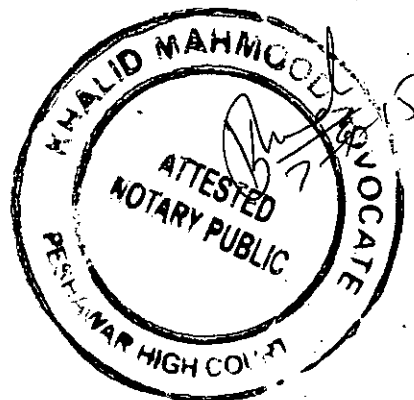
  
Appellant / Applicant

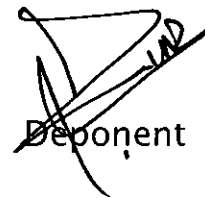
Through:

  
BILAL AHMAD KAKAIZAI  
(Advocate, Peshawar)

AFFIDAVIT

I, MUHAMMAD NASIR KHAN, Assistant, O/o Assistant Director LG&RDD, Hangu, Appellant, do hereby on oath affirm and declare that the contents of the Application are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.



  
Deponent





OFFICE OF THE DIRECTOR GENERAL  
LOCAL GOVERNMENT, ELECTIONS & RURAL  
DEVELOPMENT DEPARTMENT  
KHYBER PAKHTUNKHWA

Annex: A (9)

ANNEXURE

OFFICE ORDER

Dated Peshawar, the 30<sup>th</sup> June, 2014

No. Director(LG)3-4/Posting/Transfer/2013.- In pursuance of the letter of Assistant Director LG&RDD, Hangu, the Competent Authority has been pleased to order the following posting/transfer with immediate effect till further order.

S#	Name & Designation	From	To
1	Mr. Shah Nazar Khan Office Assistant	Office of Assistant Director LG&RDD Kohat.	Office of Assistant Director LG&RDD Karak against the vacant post.
2	Mr. Muhammad Nasir Office Assistant	Office of Assistant Director LG&RDD Hangu.	Office of Assistant Director LG&RDD Kohat.

The above mentioned officials are directed to report to their respective office under intimation to all concerned.

-sd/-

DIRECTOR GENERAL  
LG & RDD

Endst. Of even No. & Date.

Copy of the above is forwarded to the:

1. Mr. Shah Faisal Khan, MPA PK-42 Hangu.
2. Assistant Director, LG&RDD Hangu.
3. Assistant Director, LG&RDD Karak.
- ✓ 4. Assistant Director, LG&RDD Kohat
5. District Accounts Officer, District Hangu.
6. District Accounts Officer, District Karak.
7. District Accounts Officer, District Kohat
8. PA to Director General LG & RD Department.
9. Office File.

  
ATTESTED

  
DIRECTOR  
LG & RDD



Ann: B 10  
ANNEXURE

OFFICE OF THE DIRECTOR GENERAL  
LOCAL GOVERNMENT & RURAL DEVELOPMENT  
DEPARTMENT KHYBER PAKHTUNKHWA

OFFICE ORDER

Dated Peshawar, the 10<sup>th</sup> Jul, 2015;

No. Director (LG)3-4/Posting/Transfer/2012-13/13463 - The Competent Authority has been pleased to transfer the services of Mr. Muhammad Nasir, Office Assistant (BPS-16) Office of the Assistant Director LG&RDD Kohat to the Office of Assistant Director LG&RDD, Hangu against the vacant post of Office Assistant with immediate effect till further order.


-sd-

DIRECTOR GENERAL  
LG & RDD

Endst. No. & Date even.

Copy of the above is forwarded to the:

1. Assistant Director, LG&RDD Kohat.
2. Assistant Director, LG&RDD Hangu.
3. District Accounts Officer, Kohat.
4. District Accounts Officer, Hangu.
5. PA to Director General LG&RDD Khyber Pakhtunkhwa Peshawar.
6. Official Concerned.

  
Deputy Director (Admin)  
DG: LG&RDD

~~ATTESTED~~



Ann: C (11)  
~~ANNEXURE~~

OFFICE OF THE DIRECTOR GENERAL  
LOCAL GOVERNMENT & RURAL DEVELOPMENT  
DEPARTMENT KHYBER PAKHTUNKHWA

ORDER

Dated Peshawar, the 18<sup>th</sup> Aug, 2015

No. Director(LG)3-4/Posting/Transfer/2014-<sup>3616</sup> The Competent Authority has been pleased to order the following posting/transfer with immediate effect.

S #	Name & Designation	From	To
1	Mr. Nasir Khan Assistant (BPS-16)	Office of Assistant Director LG&RDD Hangu.	Office of Assistant Director LG&RDD Kohat.
2	Mr. Sahibzada Mujeeb Ur Rehmani Assistant (BPS-16)	Office of Assistant Director LG&RDD Kohat.	Office of Assistant Director LG&RDD Bannu.

The above mentioned officials are directed to report to their respective office under intimation to this office with immediate effect.

-sd/-  
DIRECTOR GENERAL  
LG & RDD

Endst. Of even No. & Date.

Copy of the above is forwarded to the:

1. Mr. Shah Faisal Khan, MPA PK-42, Hangu
- ✓ 2. Section Officer -IV Chief Minister Secretariat Khyber Pakhtunkhwa
3. P.S to Secretary LG&RDD, Khyber Pakhtunkhwa.
4. Assistant Director, LG&RDD Hangu.
5. District Accounts Officer, District Hangu.
6. Assistant Director, LG&RDD Kohat.
7. District Accounts Officer, District Kohat.
8. Assistant Director, LG&RDD Bannu.
9. District Accounts Officer, District Bannu.
10. PA to Director General LG&RDD, Khyber Pakhtunkhwa.
11. Official Concerned.

~~ATTESTED~~

Deputy Director (Admin)  
DG: LG&RDD

Ann: D (12)

ANNEXURE

GOVERNMENT OF K.P.
Diary No. 9961
Date: 25-8-2015
LG&RDD

To,

THE SECRETARY,  
Local Government Elections & Rural Development  
Department, Government of Khyber Pakhtunkhwa,  
Peshawar.

Through Proper Channel.

SUBJECT: DEPARTMENTAL APPEAL / REPRESENTATION AGAINST ORDER NO. DIRECTOR(LG)/3-4/POSTING/TRANSFER/2014/3616 DATED 18.08.2015 ISSUED BY DIRECTOR GENERAL LG&RDD WHEREBY THE MY SERVICES HAVE, ONCE AGAIN, BEEN TRANSFERRED FROM THE OFFICE OF ASSISTANT DIRECTOR LG&RDD, HANGU TO THE OFFICE OF ASSISTANT DIRECTOR LG&RDD, KOHAT.

PRAYER: On acceptance of this Appeal the subject mentioned order be cancelled to my extent and I be allowed to perform my duties as Assistant in the Office of the Assistant Director LG&RDD Hangu, with such other relief as may deem fit in the circumstances of the case may also be granted.

Respected Sir,

I, Muhammad Nasir Khan, Assistant, Office of the Assistant Director LG&RDD Hangu, submit my Departmental Appeal /- Representation against the subject mentioned Order for your honor's sympathetic and benevolent considerations as under: -

1. That, the subject mentioned Transfer Order is illegal, unlawful, void and ineffective.

2. That, the same is against the principles of Natural Justice, also.
3. That, I was transferred from the office of Assistant Director, LG&RDD, Kohat to the office of Assistant Director LG&RDD Hangu vide Order dated 10.07.2015, copy of the Order dated 10.07.2015 is attached as Annexure A.
4. That, within a span of 40 days, I, once again, have been transferred to Kohat without observing the codal formalities, instructions of ESTACODE etc, copy of the Transfer Order dated 18.08.2015 is attached as Annexure B.
5. That, I have been made a rolling stone between the office of the Assistant Director Hangu and Kohat.
6. That, no reason whatsoever has been shown to me in respect of frequent transfer orders. It is important to mention here that I am not involved in any malpractices nor any complaint or inquiry is pending against me.
7. That, keeping in view my father's deteriorating health condition; I am afraid that I may not be able to proceed again to Kohat. It is worth to mention here that I faced many hardships when I brought my ailing father from Kohat when I was transferred to Hangu last month, copies of the Medical Documents of my father are attached as Annexure-C, for ready reference.
8. That, once again resettlement in Kohat will not be as easy as the subject mentioned Order has been issued by the office with single stroke of pen.
9. That, even otherwise the post of Assistant in the office of the Assistant Director Hangu is still lying vacant and nobody has been ordered to be posted in my place.
10. That, I belong to an average family having no enmity or friendship with any forces (political or non-political) in the locality.
11. That, the Transfer Order has apparently been issued on the recommendations of political personalities and as per my

information huge pressure was exerted by the political authorities, in this respect.


12. That, it is evident from the perusal of the subject Transfer Order, that the same has been issued on the whims and wishes of political and influential persons in order to accommodate someone blue eyed moreover copies of the same had also been sent to politicians for information.
13. That, the Transfer Order as issued is based on melafide intentions and the instructions and directions as given in the Posting- / Transfer policy governing the Province are being violated.
14. That, Appellant has been pre-maturely transferred from one station to another.

It is, therefore, requested that my Appeal / Representation be accepted as prayed for.

Thanking you.

Yours faithfully,

Dated: 25.08.2015

  
(MUHAMMAD NASIR KHAN),  
Assistant,  
O/o Assistant Director LG&RDD,  
Hangu,

  
ATTESTED



Annex E (15)  
ANNEXURE

OFFICE OF THE DIRECTOR GENERAL  
LOCAL GOVERNMENT & RURAL DEVELOPMENT  
DEPARTMENT KHYBER PAKHTUNKHWA

No. Director (LG) 3-4/Posting/Transfer/2013/3696  
Dated Peshawar, the 4<sup>th</sup> September, 2015

To

Mr. Muhammad Nasir Khan  
Assistant, LG&RDD  
District, Hangu.


Subject: - DEPARTMENTAL APPEAL/REPRESENTATION AGAINST ORDER NO.DIRETOR(LG)3-4/POSTING/TRANSFER/2014/3616 DATED 18.08.2015 ISSUED BY DIRECTOR GENERAL LG&RDD WHEREBY MY SERVICES HAVE ONCE AGAIN BEEN TRANSFERRED FROM THE OFFICE OF ASSISTANT DIRECTOR LG&RDD HANGU TO THE OFFICE OF ASSISTANT DIRECTOR LG&RDD KOHIAT.


I am directed to refer to your departmental appeal on the subject noted above and to inform you that your appeal has been regretted by the competent authority.

  
Deputy Director (Admin)  
DG: LG&RDD

Cc:

1. PA to Director General, LG&RDD, Khyber Pakhtunkhwa.

  
Deputy Director (Admin)  
DG: LG&RDD

  
ATTESTED



5/B-2 Phase - 5 Hayatabad Peshawar Pakistan  
 Tel: +92-91-5838000 | UAN: 111-REH-MAN | Fax: +92-91-5838333  
 Appointments: +92-91-5838666  
 healthcare@rmi.edu.pk | www.rmi.edu.pk

(16) Ann: F  
 ANNEXURE REPORT  
 Discharge Sheet

RMI Patients

DISCLAIMER: THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

**Patient Information**

**PRN No:** 13-10-007781  
**Name:** Mr Jhangir Aman  
**Gender:** Male **Age:** 50 Years  
**Phone:** 03319444955  
**Address:** Muhallah sarki piyala distt hangu k.p.p

**Admission Information**

**Admission No:** 14-07-000414  
**Admission Date:** 9/7/2014 10:35AM  
**Ward:** Ward B  
**Room/Bed:** 203/A  
**Discharge Date:** 16/7/2014 9:47AM  
**Discharge Type:** Normal Discharge

**Consultant**

**Primary:** Prof. Muhammad Rehman  
**Secondary:** Prof. Muhammad Rehman

**Package**

o CABG Coronary Artery By-Pass Grafting

**Department**

(Cardiac Surgery)

**Diagnosis**

Triple vessel disease

**Presenting Complaints**

SHORTNESS OF BREATH,  
 CHEST PAIN.

**Clinical Status**

STABLE

**Investigations**

ATTACHED

**Risk Factors**

EXPLAINED

**Treatment At Hospital**

**Operation Notes**

S/P - CABG (1+3)  
 (10/07/2014):  
 SV GHARVESTED, MEDIAN STERNOTOMY DONE, LIMA HARVESTED.  
 AORTA & RT ATRIAL CANNULATION DONE AND CPB ESTABLISHED. COOLING  
 DONE. AORTA X-CLAMPED. ANTEGRADE BLOOD CARDIOPLEGIA USED.  
 FINDINGS: SEVERE DIFFUSE 3 VESSEL DISEASE, GOOD TARGETS WITH  
 GOOD DISTAL RUNOFF.  
 PROCEDURE:  
 GRAFTS: ROUTINE ONBYPASS, LIMA AND SVG HARVESTED, LIMA  
 ANASTOMOSIS TO MID LAD, SVG ANASTOMOSIS TO OM, DIAG AND RCA.  
 REWARMING DEAIRING DONE, UNEVENTFUL OFFBYPASS PASSING WIRE ON  
 RV, 3 DRAINS, HEMOSTASIS SECURED, SUTURING AND CLOSURE DONE ASD.

**Medicines**

INJ AUGMENTIN  
 INJ CLAFRON

ATTESTED

**Post Operative Complication**

NIL

**Precautions**

**Medicines**

CAP. ESSO 40MG	1 TAB - ONCE DAILY	ایک کیپسول صبح (۲ ہفتہ) کھانے سے پہلے
NILSTAT ORAL DROPS		۷ دن کیپسول
SYP COSONE	2 TSF THRICE DAILY	دو چمچ صبح دوپہر شام حسب ضرورت
TAB CORDARONE 200MG	1 TAB TWICE DAILY	ایک گولی صبح شام (جاری)
TAB FEXET -D	1 TWICE DAILY	ایک گولی صبح دوپہر شام (۵ دن)
TAB STEMITIL	1 THRICE DAILY	ایک گولی صبح دوپہر شام (۱ ہفتہ)
TAB. CIPROXIN 500MG	1 TAB - TWICE DAILY	ایک گولی صبح شام (۵ دن)
TAB. CONCOR 2.5MG	1 TAB ONCE DAILY	ایک گولی صبح (جاری)
TAB. LOWPLAT PLUS 75MG	1 TAB - ONCE DAILY.	ایک گولی صبح (جاری)

Handwritten signature and notes in Urdu.



17

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5/B-2 Phase - 5 Hayatabad Peshawar Pakistan  
Tel: +92-91-5838000 | UAN: 111-REH-MAN | Fax: +92-91-5838333  
Appointments: +92-91-5838666

REPORT

Discharge Sheet

healthcare@rmi.edu.pk | www.rmi.edu.pk

RMI Patients

TAB. PANADOL

DISCLAIMER: THIS REPORT IS TO BE USED FOR PATIENT REPORTS

دو گولی صبح دوپہر شام (۱ ہفتہ)

TAB. SPIROMIDE 40MG

1 TAB - ONCE DAILY

ایک گولی صبح (۲ ہفتہ)

Follow Up:

Visit your Consultant ( Prof.Muhammad Rehman ) on 21/07/2014.

Please ensure that you have booked an appointment prior to your visit by calling on the following telephone number: (92-91) 5825501-07 lines

Discharged By:

Nazish  
Masood

Nazish  
Medical Officer

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Discharge Sheet

RMI Patients

**Patient Information**

PR No: 13-10-007781

Name: Mr Jhangir Aman

Gender: Male Age: 50 Years

Phone: 03319444955

Address: Muhallah sarki pehla distt hangu k.p.p

Blood Group: \_\_\_\_\_

Weight: \_\_\_\_\_ kg

Height: \_\_\_\_\_ ft

**Admission Information**

Admission No: 13-10-001156

Admission Date: 22/10/2013 8:17AM

Ward: Ward A

Room/Bed: 104 / A

Discharge Date: 22/10/2013 6:09PM

Discharge Type: Normal Discharge

**Consultant** Prof. Waheed Sahibzada

**Package** o Angiography

**Department** (Cardiology)

**Secondar** Prof. Waheed Sahibzada

**Diagnosis**

**Presenting Complaints** ADMITTED FOR COR ANGIO

**Clinical Status** STABLE

**Investigation** ALL LABS ATTACHED WITH DISCHARGE SLIP

**Risk Factors** EXPLAINED

**Treatment At Hospital**

**Operation Notes** COR ANGIO..... SIGNIFICANT DISEASE LAD , CIRCUMFLEX , OM AND RCA

**Medicines** AS PER ORDERS

RECOMMENDATION..... CABG / PCI

**Post Operative Complication** NIL

**Precautions**

**Care At Home** PROPER MEDICATIONS AS ADVISED  
REVIEW IN CLINIC FOR FOLLOW UP

**Diet** LOW SALT AND LOW FAT DIET

**Medicines** PRESCRIPTION ATTACHED

**Follow Up** Visit your Consultant ( Prof. Waheed Sahibzada ) 7 days after discharge from the hospital.  
Please ensure that you have booked an appointment prior to your visit by calling on the following telephone number: (92-91) 582550-07 lines

**Discharged By:** Mati Ullah Khan Medical Officer

*Mati Ullah Khan*

*Dr. Khizar Hayat*

Dr. Khizar Hayat  
Director Medical Services

RMI Institute Pakistan

DISCLAIMER : THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS.

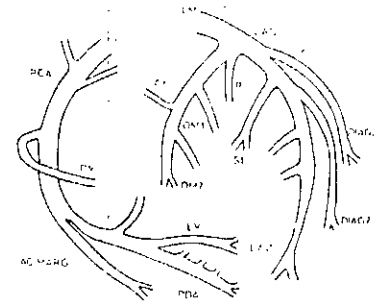
## Angiography

Request No: 13-10-002889	PR No: 13-10-007781	Entered: 22, Oct, 13 10:18AM
Patient Name: Mr. Jhangir Aman	(Male: 50 Years)	Printed: 22, Oct, 13 10:52AM
Consultant: Waheed Sahibzada Prof.		Location: Ward A

### Procedure:

Right Radial Artery entered via Seldinger's technique and 5F sheath inserted. Patient given 2000 units of heparin and 100 micrograms of Nitroglycerine. Standard views taken using a Radial Tiger catheter. Hemostasis secured using TR band inflator.

### Summary of Hemodynamic:



### Left Main Stem:

Normal.

### Left Anterior Descending Artery:

Proximal 70% lesion.

### Diagonals:

- o D1. Small tiny vessel with ostial and proximal 95% lesion.
- o D2 & D3: Small size normal vessel.

### Left Circumflex Artery:

Distal portion has a 90% lesion.

### Obtuse Marginals:

- o OM1: Proximal 70% lesion
- o OM2: Normal.

### Right Coronary Artery:

Proximal to mid long segment of about 90% narrowing. Distal portion has 70-80% narrowing PLV small vessel with proximal 95% disease. PDA small size vessel with proximal 80-90% lesion.

### Final Diagnosis:

Significant disease LAD, circumflex, OM & RCA.

### Recommendation:

CABG/ PCI.

### CD #:

9768 Typed by Roman Ali Khan.

This is computer generated report and is duly verified by the consultant.

Please use this to link to download dicom software: <http://www.rmi.com.pk/dicom/index.php>

*Waheed Sahibzada*  
 Prof. Waheed Sahibzada



**Procedure Confirmation Slip**

**Patient Information**

PR No: 13-10-007781  
 Name: Mr. Jhangir Aman  
 Gender: Male      Age: 50 Years  
 Phone: 03319444955  
 Address: Muhallah sarki pehla distt hangu k.p.p

**Admission Information:**

Admission No: 13-10-001156  
 Admission Date: 22/10/2013 8:17AM  
 Ward: Ward A  
 Room/ Bed: 104 / A

**Booking No.**

**Package / Procedure**

**Surgeon**

**Anesthetist**

13-09894

Angiography

Waheed Sahibzada Prof.

Anesthesia Type: LA

OT : Cath Lab

In Time: 22/10/2013 9:30AM

Out Time: 22/10/2013 9:40AM

Total Time: 10 (min)

**Operation Notes:**

[Large empty box for operation notes]

**Verified By:**

Surgeon: Waheed Sahibzada Prof.      Sign:

Assistant Surgeon:      Sign: \_\_\_\_\_

Anesthetist:      Sign: \_\_\_\_\_

Entered By: Mr Roman Ali

Entered on: 22/10/2013 10:38AM

91

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5/B-2 Phase - 5 Hayatabad Peshawar Pakistan  
Tel: +92-91-5838000 | UAN: J I I -REH-MAN | Fax: +92-91-5838333  
Appointments: +92-91-5838666

REPORT

DISCLAIMER : THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS  
**PATHOLOGY DEPARTMENT**

Reception ID: 14-001-0131891 PR No: 13-10-007781 Entered: (21 Jul 14, 10:28)  
Patient Name: Mr Jhangir Aman (M: 50 Year(s)) Printed: 21, Jul, 14, 15:20  
Referred By:

**Complete Blood Counts**

Haemoglobin	10.9 g/dl	(13.5 - 17.5)	Neu	66.0 %	(40 - 75)
WBC	11.0 x10 <sup>9</sup> /l	(4.0 - 11.0)	Lym	22.7 %	(20 - 45)
Platelets	716 x10 <sup>9</sup> /l	(150 - 400)	Mono	7.51 %	(2 - 10)
RBC	4.45 x10 <sup>12</sup> /l	(4.5 - 6.5)	Eos	3.05 %	(1 - 6)
PCV	0.331 l/l	(0.4 - 0.5)	Baso	0.722 %	(0.1 - 1)
MCV	74.4 fl	(80 - 100)	Neu	7.23 X10 <sup>9</sup> /l	(2.0 - 7.5)
MCH	24.6 pg	(27.0 - 32.0)	Lym	2.49 X10 <sup>9</sup> /l	(1.5 - 4.0)
MCHC	33.1 g/dl	(30 - 35)	Mono	0.823 X10 <sup>9</sup> /l	(0.2 - 0.8)
RDW-CV	12.8 (%)		Eos	0.334 X10 <sup>9</sup> /l	(0.04 - 0.4)
			Baso	0.079 X10 <sup>9</sup> /l	(0.02 - 0.1)

Comment: Hypochromic microcytic RBCs, advise serum ferritin. Reactive thrombocytosis.

Notes: Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this report may be addressed within twenty four hours of reporting, the duration for which the samples are preserved.

Dr. Fazle Raziq  
MBBS, M.Phil, FCP(Haematology), FCPP  
(Hon.)  
Professor, Consultant Haematologist  
Head of Pathology Department & Blood  
Bank  
Dr. Shahtaj Khan  
MBBS, DCP, FCPS

Col (R) Dr. M Ashraf Qamar SI (M); TI (M)  
MBBS, M.Phil, FCPS (Histopath)  
Consultant Histopathologist/Cytopathologist  
Professor & Consultant Histopathologist

Dr. Jehan Zeb  
BSc, MD, M.Phil  
Professor & Consultant Chemical  
Pathologist

Dr. Sayed Sarwar Ali  
MBBS, FCPS (Haematology)  
Asst. Professor & Consultant Haematologist

Dr. Salar Zai  
Dip. Med. Microbiology (Malaysia)  
MSc. M. Phil, Ph.D Micro (England)  
Consultant Microbiologist

92 374



5/B-2 Phase - 5 Hayatabad Peshawar Pakistan  
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REPORT

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### Echocardiography

Request No: 14-07-000840 PR No: 13-10-007781 Entered: 08, Jul, 14 03:16PM  
 Patient Name: Mr. Jhangir Aman (Male: 50 Years) Printed: 09, Jul, 14 05:32PM  
 Consultant: Muhammad Rehman Prof. Location: Cardiology.

Measurements	Observed	Normal Range(mm)	Parameter	Values	Range
Aortic Root Dimension	28	20--40	EPSS		0--9
Left Atrial Dimension	37	19--39	PHT		--
LV End Diastolic Dimension	47	36--56	E Velocity(cm/sec)		34--9
LV End Systolic Dimension	32	25--41	A Velocity(cm/sec)		31--87
IVS Thickness	11	8--12	E: A Ratio		5--1.7
LVPW Thickness	11	7--11	RVSP		--
Rt. Vent. Dimension	24	7--25			
Function Indices					
Fractional Shortening	33%		Ejection Fraction	61%	
IVRT			E. Wave DT		
PAP(mmHg)			Dias		
Sys					

Valves	Gradient (mmHg)		Peak Velocity (cm/sec)	Valve Area (cm) <sup>2</sup>		Regurgitation
	Peak	Mean		Doppler	2-D	
Mitral Valve						
Tricuspid Valve						
Aortic Valve						
Pulmonic Valve						

**Comments:**

- Normal size cardiac chambers.
- Good LV systolic function.
- LV apex appears to be hypokinetic.
- E.A across the mitral valve is reversed with ratio 0.69.
- Valves are normal in structure.
- No clot or pericardial effusion.

**Conclusion:**

Good LV systolic function.

*Dr. Arshad Hussain*

Dr. Muhammad Arshad Hussain

This is computer generated report and is duly verified by Cardiac Sonologist.

Spinal LV  
Zuko - DONE

For: 20  
Zuko

Dr. Mansoor

discharge 40 g breast

di CABG on 10/7/14

Attmt RMI on 9/7/14

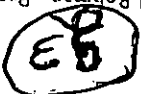
Triples Venous CAD

Cor Argo - 22 OCT 2013

Soyano

Mr. Tariq Khan

8-7-14



X

Dr. P. Haseem, Head of Department, Pakistan  
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Dr. Haseem  
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Dr. Haseem

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Dr. Haseem

21/7/11

Dr. Muhammad Rehman - Professor  
FRCS, FCPS (hon)  
Cardiac Surgeon & Head of the Dept. of Cardiac Surgery  
muhammad.rehman@rmi.edu.pk Direct Tel: +92-91-5838303  
Clinic Timing: 6:00 pm - 9:00 pm (Monday - Friday)

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19/8/14

Dr. Muhammad Rehman  
 (1+3)

AP. KPR/MV  
 5 R.  
 clean clean

5576

# Test  
 1+0+1

2.5mg

# Test  
 1+0+0

2.5mg

# Test  
 1+0+0

2.5mg

AP

5576

Dr. Muhammad Rehman - Professor  
 FRCS, FCPs (hon)  
 Cardiac Surgeon & Head of the Dept. of Cardiac Surgery  
 muhammad.rehman@rmi.edu.pk | Direct Tel: +92-91-5838303  
 Clinic Timing: 6:00 pm - 9:00 pm (Monday - Friday)

21/10/13

Detachment -  
 → Angiogram

72/90 HR

13/10/13

Cardiac N

ADU  
 Car: Ang 2

Dr. Muhammad Rehman  
 Dr. Farooq  
 Dr. Qureshi  
 Dr. Khan  
 Dr. Ahmad  
 Dr. Khan  
 Dr. Khan  
 Dr. Khan

Heart + vessels  
 22/10/13  
 for Car Angiogram  
 Dr. Muhammad Rehman

S/B-2 Phase - 5 Hayatabad Peshawar Pakistan  
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21/10/13

(27) 398

Reception ID: 13-001-0162413 PR No: 13-10-007781

Entered: (21, Oct 13 19:28)

Patient Name: Mr. Jhangir Aman (Male : 50 Year(s))

Printed: 22, Oct. 13. 09:29

Referred By:

Ward: Ward A

**Glucose group**

Plasma Glucose (R) 83 mg/dl (<200)

**Interpretation**  
(ADA 2006)  
Normal: <100 (F), <200 (2hr); Diabetes Mellitus: >126 (F) or >200 (2hr); Pre-diabetes: Impaired Glucose Tolerance (IGT): 140-200 (2hr); Impaired Fasting Glycaemia (IFG): 100-126 (F). All values mg/dl, venous plasma/serum. True Random plasma glucose value, the one having no relationship with meal has limited screening/diagnostic/prognostic value. For clinical purposes, the diagnosis of diabetes should be confirmed by repeating the test unless there is unequivocal hyperglycaemia with acute metabolic decompensation or obvious symptoms.

**Kidney Profile**

Blood Urea 31 mg/dl (10 - 50)  
Serum Creatinine 0.78 mg/dl (0.7 - 1.2)  
Estimated GFR 105.36 ml/min/1.73 sqm (30 - 130)

**Interpretation**  
Estimation of GFR in adults is based on Age, gender and serum creatinine according to the modified MDRD equation (Levey et al, 2007).  
In children upto 18 years of age it is based on serum creatinine and height. 3. Estimated GFR may not correlate with creatinine clearance for healthy population, at the extremes of body size, acute or chronic renal failure, and in patients on dialysis.

**Complete Blood Counts**

Haemoglobin	14.8 g/dl	(13.5 - 17.5)	Neu	55.0 %	(40 - 75)
WBC	7.31 x10 <sup>9</sup> /l	(4.0 - 11.0)	Lym	30.8 %	(20 - 45)
Platelets	216 x10 <sup>9</sup> /l	(150 - 400)	Mono	8.73 %	(2 - 10)
RBC	5.75 x10 <sup>12</sup> /l	(4.5 - 6.5)	Eos	4.49 %	(1 - 6)
PCV	0.484 l/l	(0.4 - 0.5)	Baso	0.961 %	(0.1 - 1)
MCV	84.2 fl	(80 - 100)	Neu	4.02 X10 <sup>9</sup> /l	(2.0 - 7.5)
MCH	25.7 pg	(27.0 - 32.0)	Lym	2.25 X10 <sup>9</sup> /l	(1.5 - 4.0)
MCHC	30.6 g/dl	(30 - 35)	Mono	0.639 X10 <sup>9</sup> /l	(0.2 - 0.8)
RDW-CV	11.5 (%)	(&nbsp;&nbsp;  - &nbsp; &nbsp;)	Eos	0.328 X10 <sup>9</sup> /l	(0.04 - 0.4)
			Baso	0.070 X10 <sup>9</sup> /l	(0.02 - 0.1)

Notes: Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this report may be addressed within twenty four hours of reporting, the duration for which the samples are preserved.

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Reception ID: 13-001-0162413 PR No: 13-10-007781  
Patient Name: Mr. Jhangir Aman (Male : 50 Year(s))  
Referred By:

Entered: (21. Oct 13. 19:28)  
Printed: 22. Oct. 13. 09 29  
Ward: Ward A

### Hepatitis B Profile

Hepatitis B Surface Antigen 0.40 ()  
Result Non-Reactive ()

```
<div style="text-align: justify;">
  <strong>Interpretation</strong></div>
<ol>
  <li style="text-align: justify;">
    The cut-off value for HBsAg varies from 0.05 to 2.00 depending upon the technique/analyser used for the assay. Therefore the values obtained from two different labs/instruments may not be comparable.</li>
  <li style="text-align: justify;">
    Value more than cut-off is REACTIVE. Test is performed by one of the following systems as indicated with the respective cut off value.</li>
</ol>
<ul>
  <li style="text-align: justify;">
    Chemiluminescent Microparticle Immunoassay (CMIA) Architect i 1000 SR System</li>
  <li style="text-align: justify;">
    Electrochemiluminescence Immunoassay (ECLIA) Cobas e 4 11 System Interpretation</li>
</ul>
<ol>
  <li style="text-align: justify;">
    HBsAg indicates exposure to HBV.</li>
  <li style="text-align: justify;">
    Reactive HBsAg indicates active infection and its presence for more than 06 months indicates</li>
  <li style="text-align: justify;">
    chronic infection.</li>
  <li style="text-align: justify;">
    Absence of HBsAg rules out HBV infection with the exception of window-period.</li>
  <li style="text-align: justify;">
    The detection of HBsAg must be correlated with patient symptoms and other hepatitis B viral serological markers.</li>
  <li style="text-align: justify;">
    In positive case the viral load may be determined by quantitative PCR for further confirmation.</li>
</ol>
```

Notes: Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this report may be addressed within twenty four hours of reporting, the duration for which the samples are preserved.

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Reception ID: 13-001-0162413 PR No: 13-10-007781  
Patient Name: Mr. Jhangir Aman (Male 50 Year(s))  
Referred By:

Entered: (21. Oct 13. 19:28)  
Printed: 22. Oct. 13. 09:29  
Ward: Ward A

**Viral Profile**

Anti-HCV (Antibodies) 0.05 ()  
Result Non-Reactive ()

<div style="text-align justify;">  
Value more than cut-off is REACTIVE. Test is performed by one of the following systems as indicated with the respective cut off value. a. Chemiluminescent Microparticle Immunoassay (CMIA) Architect ci 8200 System. b. Electrochemiluminescence Immunoassay (ECLIA) Hitachi E170 System. c. Chemiluminescent Immunoassay Advia Centaure. Interpretation: <strong>REACTIVE Result: A positive Anti-HCV antibodies test requires confirmation by immunoblot test or by PCR. Negative Result: A negative test does not exclude the possibility of exposure or infection with Anti-HCV antibodies. The testing for HCV by PCR is not indicated in cases with negative Anti-HCV sero-status. Gray Zone Result: Please repeat the test with a fresh blood sample for confirmation or preferably it should be repeated after 08 weeks. Indeterminate Result: Please repeat the test with a fresh blood sample after 08 weeks or confirm by PCR. In positive case the viral load may be determined by quantitative PCR for further confirmation. </div>

Notes: Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this report may be addressed within twenty four hours of reporting, the duration for which the samples are preserved.

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Reception ID: 13-001-0162413 PR No: 13-10-007781  
Patient Name: Mr. Jhangir Aman (Male : 50 Year(s))  
Referred By:

Entered: (21. Oct 13. 19:28)  
Printed: 22. Oct, 13. 09:29  
Ward: Ward A

HIV Ag/Ab Combo 0.08 (<1.0 - &nbsp;)&nbsp;)  
Result Non-Reactive (&nbsp;- &nbsp;)&nbsp;)

The cut-off value of Anti-HIV antibodies is 1.00. Value more than cut-off is REACTIVE. Test is performed by: a. Chemiluminescent Microparticle Immunoassay (CMIA) Architect i 1000 SR System (HIV Ag/Ab Combo). The ARCHITECT HIV Ag/Ab Combo assay is a chemiluminescent microparticle immunoassay (CMIA) for the simultaneous qualitative detection of HIV p24 antigen and antibodies to HIV type 1 and 2. b. Electrochemiluminescence Immunoassay (ECLIA) Hitachi E170 System Interpretation Indeterminate/REACTIVE test result must be confirmed by western blot test and or PCR.

Notes: Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this report may be addressed within twenty four hours of reporting. the duration for which the samples are preserved.

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Reception ID: 13-001-0162413 PR No. 13-10-007781  
Patient Name: Mr. Jhangir Aman (Male : 50 Year(s))  
Referred By:

Entered: (21, Oct 13, 19:28)  
Printed: 22, Oct, 13, 09:29  
Ward: Ward A

**Blood Grouping**

ABO grouping  
Rh factor

'A'  
'NEGATIVE'

(&nbsp;-&nbsp;)  
(&nbsp;-&nbsp;)

Notes: Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this report may be addressed within twenty four hours of reporting, the duration for which the samples are preserved.

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Radiology No: 14-07-002431

Consultant: Prof. Muhammad Rehman

Test Date: 10/07/2014

PR No: 13-10-007781

Name: Mr Jhangir Aman

Age: 50 Years

Gender: Male

/\*13-10-007781\*/

### Ultra Sound ( Abdomen )

#### Liver

is normal in size with diffuse increase parenchymal echogenicity - suggestive of diffuse fatty liver. No mass lesion is seen. No intrahepatic biliary dilatation. Normal calibre of CBD and portal vein.

#### Gall bladder

is normal in size having normal wall thickness with no calculus formation.

#### Pancreas

is of normal size with normal parenchymal echopattern.

#### Spleen

is of normal size with no evidence of any focal lesion.

#### Kidneys:

Both kidneys are of normal size with normal cortical thickness and well preserved cortico medullary demarcation. No cyst, mass, calculus or hydronephrosis is seen.

#### Urinary bladder

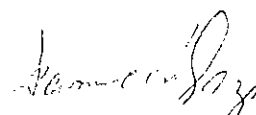
is not optimally filled however appears normal.  
Partially filled bladder prostate appears 31 gms.

#### General abdomen

No ascites / para-aortic lymphadenopathy noted.

#### Impression

1. FATTY LIVER.
2. ENLARGED PROSTATE (ON PARTIALLY FILLED BLADDER).


  
Dr. Samreen Qazi

Sonologist



33

in Patient cash

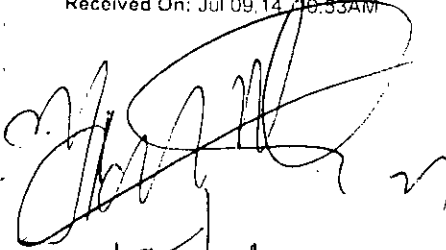
PR No:13-10-007781		Bill No: B14-07-4592
Name: Mr.Jhangir Aman ( M:50 Y )		Paid No: P14-040798
Admission No: 14-07-000414	Admission Date: 09/07/2014 10:35AM	
Consultant: Muhammad Rehman Prof.		

S#	Package	Mode	Payment Made
1	CABG Coronary Artery By-Pass Graft	cash	335,000

Amount in word: Rupees Three Hundred Thirty-Five Thousand Only.  
Total Amount: 335,000

Received By: Mr. Muhammad Hashim Khan

Received On: Jul 09, 14 10:53AM

  
9/7/14



5/B-2 Phase - 5 Hayatabad Peshawar Pakistan  
 Tel: +92-91-5838000 | UAN: 111-REH-MAN | Fax: +92-91-5838333  
 Appointments: +92-91-5838666

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REPORT

DISCLAIMER: THIS FORM CAN ONLY BE USED FOR PATIENT REPORTS

### Echocardiography

Request No: 14-07-000840 PR No: 13-10-007781 Entered: 08, Jul, 14 03:15  
 Patient Name: Mr. Jhangir Aman (Male: 50 Years) Printed: 08, Jul, 14 03:25  
 Consultant: Muhammad Rehman Prof. Location: Cardiology

Measurements	Observed	Normal Range(mm)	Parameter	Values	Range
Aortic Root Dimension	28	20-40	EPSS		0-9
Left Atrial Dimension	37	19-39	PHT		--
LV End Diastolic Dimension	47	36-56	E Velocity(cm/sec)		34-9
LV End Systolic Dimension	32	25-41	A Velocity(cm/sec)		31-87
IVS Thickness	11	8-12	E: A Ratio		5-1.7
LVPW Thickness	11	7-11	RVSP		--
Lt. Vent. Dimension	24	7-25			

**LV Function Indices**

Fractional Shortening 33% Ejection Fraction  
 IVRT E. Wave DT

61%

**PAP(mmHg)**

Sys Dias

Valves	Gradient (mmHg)		Peak Velocity (cm/sec)	Valve Area (cm) <sup>2</sup>		Regurgitation
	Peak	Mean		Doppler	2-D	
Mitral Valve						
Tricuspid Valve						
Aortic Valve						
Pulmonic Valve						

**Comments:**

- o Normal size cardiac chambers.
- o Good LV systolic function.
- o LV apex appears to be hypokinetic.
- o E A across the mitral valve is reversed with ratio 0.69.
- o Valves are normal in structure.
- o No clot or pericardial effusion.

**Conclusion:**

Good LV systolic function.

*Dr. Arshad Hussain*  
 Dr. Muhammad Arshad Hussain



36

# HEARTS INTERNATIONAL (PVT) HOSPITAL

192-A, THE MALL, RAWALPINDI-PAKISTAN

## CARDIAC CATHETERIZATION/ CORONARY ANGIOGRAPHY

Ref. No. \_\_\_\_\_

Date: \_\_\_\_\_

Patient Name : Jhangir Khan  
Age : 45 Years  
Procedure Date : 10.02.2014

Operators: Maj. Gen. ® Ashur Khan.

Procedures: The patient was brought to cath in stable condition. Applying local anesthesia with 2% Xylocaine, right radial approach was used to introduce specific catheters and record Angiograms as followings.

After conclusion of the study. Catheter and guide-wire were removed and adequate Homeostasis was achieved with local pressure. Usual sterile dressing was applied and patient send back to the room.

Complications: None

Result of the Study:

Aortic pressure 115/70 Mean 85

37



# HEARTS INTERNATIONAL (PVT) HOSPITAL

192-A, THE MALL, RAWALPINDI-PAKISTAN

## CARDIAC CATHETERIZATION/ CORONARY ANGIOGRAPHY

Ref. No. \_\_\_\_\_

Date: \_\_\_\_\_

135

Through right radial approach

Left Ventriculogram:

Not done.

Left Main Coronary Artery:

Normal.

Left Anterior Descending Artery:

Long segment of critical stenosis.

Circumflex Coronary Artery:

Critical stenosis in OM & distal Lt. Cx.

Right Coronary Artery:

Dominant, critical in proximal, mid & distal RCA.

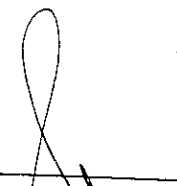
Summary Of Findings:

Triple vessel disease.

Recommendations:

CABG / PCI.

Maj. Gen. (Retd)  
Mohammad Ashraf Khan  
Chief Executive

  
Maj. Gen. Ashur Khan  
Consultant Cardiologist

Phone: 5563855-5510888-5566149-5518931-4, Fax: 5566241

38

Dr. Kamran Bangash

M.D. Dip card 'Pic'  
Cardiologist / Physician  
Consultant Cardiologist  
Hayat Abad Medical Complex  
Peshawar



ڈاکٹر کامران بنگاش

ایم ڈی، ڈپ کارڈیائی آئی سی  
ماہر امراض قلب / فزیشن  
کنسلٹنٹ کارڈیالوجسٹ  
حیات آباد میڈیکل کمپلیکس پشاور

Name Tehangir Age 55yrs Date 6 OCT 21

Tat. Concor  
E<sub>1</sub> 5  
Tat. Dovel Phos  
Tat. Ravista  
3 10  
Eap. Niflyp SR  
1-1 2.6  
Tat. Trikat MK  
H1 /

Chest X-ray  
on med  
examination

HR 130/80  
L, S<sub>2</sub>

ECG  
EAD  
LOC - two

Adm. Cor Angio  
± PCI

بروزیہ کارڈیالوجی او ای ڈی

Bangash

39

اکٹر کامران بنگش

ایم ڈی، ڈپ کارڈیالوجی

ماہر امراض قلب / فریٹیشن

کنسالتنٹ کارڈیالوجسٹ

حیات آباد میڈیکل کولج پشاور

Dr. Kamran Bangash

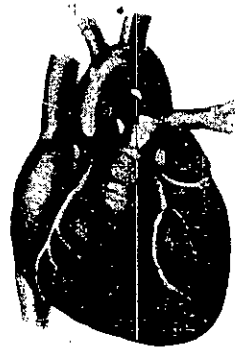
M.D, Dip card 'Pic'

Cardiologist / Physician

Consultant Cardiologist

Hayat Abad Medical Complex

Peshawar



Name: Jehangir

Age: 55 yrs

Date: 22 SEP 20

147W

Tab. Concor

21 2mg

Cap. Nigibay SR

141 2.6

Tab. Ugeval ~~SR~~

1 75

Tab. Roviota

3 10

Bangash

Cardiac Doppler

Unconscious

Chest pain on

effort

170/110 bpm

150/90 - Stomach

6 Ch

Amust

147W

- CAD

- Arrhythmic

ROW

- Cardiac Doppl

- X-ray cervical

- Holter monitor

May need losartan

Tab. Eyleon

6, 7 x 141 500



40

Pt Name Jahangir  
Sex M  
Referred by Dr Kamran Khan

Date 22/09/2013  
Age  
Specimen: Blood

Test Required Lipid Profile

TEST	RESULT	NORMAL VALUES
Total Lipid	-- mg/dl	(450mg/dl -----800mg/dl)
Triglycerides	174 mg/dl	(40mg/dl -----240mg/dl)
Serum Cholesterol	200 mg/dl	(100mg/dl-----200mg/dl)
HDL	66 mg/dl	(M 35 mg/dl-----55 mg/dl) (F 45mg/dl-----65 mg/dl)
LDL	99.2 mg/dl	(Up to 150 mg/dl)
R.B.Sugar	105 mg/dl	(100mg/dl-----140 mg/dl)
Blood Urea	37 mg/dl	(15mg/dl-----40mg/dl)

Lab. Technologist

ATTESTED

Ann: G (41)

ANNEXURE

To

THE INFORMATION OFFICER,  
Under Right to Information Act, 2014,  
Hangu.

Subject: Application under Right to Information Act, 2014 for provision of  
Letter No. SO-IV/CMS/LG/2015/10560-61 dated 11-8-15 along with other  
relevant record.

Dear Sir,

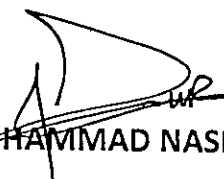
Under the Right to Information Act, undersigned wants to have the  
attested copies of the following documents:

Letter No. SO-IV/CMS/LG/2015/10560-61 dated 11-8-15 sent by the  
Section Officer-IV Chief Minister House along with its enclosures.

It is, therefore, requested that the above mentioned information may  
please be provided to the undersigned.

Thanking you,

Yours Faithfully,

 04-09-2015  
MUHAMMAD NASIR KHAN

Assistant,

Office of the Assistant Director,

Hangu.



(42)



**CHIEF MINISTER'S SECRETARIAT  
KHYBER PAKHTUNKHWA PESHAWAR**

No. SOIV/CMS/KPK/LG/2015 / 1056a-61  
Dated Peshawar the 11<sup>th</sup> August, 2015

To

The Secretary to Govt. of Khyber Pakhtunkhwa  
Local Govt. & Rural Development Department.

Subject: POSTING OF NASIR KHAN ASSISTANT OFFICE OF A.D. LG&RDD  
HANGU.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory D.O letter dated 04-08-2015 from Mr. Shah Faisal Khan, MPA PK-42, Hangu, whereupon the Hon'ble Chief Minister, Khyber Pakhtunkhwa has been pleased to record the following remarks:-

Secy L.C.B.

"Please Transfer"

-- Sd/HCM --

It is, therefore, requested that necessary action may kindly be taken in light of above directive of Hon'able Chief Minister, as per rules / policy, under intimation to this Secretariat.

Yours faithfully,

Encls: As Above

Section Officer-IV

Endst. No. & date Even.

Copy is forwarded to: -

1. Mr. Shah Faisal Khan, MPA PK-42, Hangu.
2. The PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.

Section Officer-IV

SI

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**Shah Jaisal Khan**

Member Provincial Assembly  
Khyber Pakhtunkhwa  
PK-42 Hangu



Mob: 0331-92925

Date: 04-08-201

MRD

SO-IV D.No. 596

To

Dated 11/8/15

The Secretary  
Local Govt: & RDD, KP, Peshawar.

Subject: Posting of Nasir Khan Assistant  
Officer of AD Local RDD Hangu.

Respected Sir!

With due regards, it is submitted that the subject official may please be posted out, because he is creating problems for the locals and the public representatives.

S. . . . .

Transfer.

Parliamentarian

Yours faithfully

CHIEF MINISTER  
KHYBER PAKHTUNKHWA

18

بعد العملیہ  
Before KPK Service

Tribunal, Peshawar

Appellant 2  
بنانا  
Govt. of K.P.R.  
etc

Muhammad Nasir  
Khan

مورخہ

مقدمہ

دعویٰ

جرم

### باعث تحریر آنکد

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

آن مقام Peshawar کیلئے Bilal A. Kakaija Adv

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی 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 کاروائی 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 پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔ 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 سند ہے۔

Muhammad Nasir

المرقوم

07 ماہ

سپتمبر

2015

العبد گواہ العبد

مقام

کے لئے منظور ہے۔



**OFFICE OF THE**  
**ASSISTANT DIRECTOR, LG&RDD**  
**HANGU.**

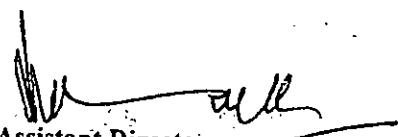
No. 1702-04/AD/LG&RDD (H)  
Dated: 29/09/2015

**AUTHORITY LETTER**

Memo:

Mr. Abdul Munim Khan Supervisor/Secretary Ward Khanbari is hereby authorized to attend the Honorable Court of services Tribunal Peshawar in the case/Appeal No.979/2015, i.e. Mohammad Nasir Khan VS Secretary Local Government and Rural Development Department, Director General, Local Government and Rural Development Department and Assistant Director, Local Government and Rural Development Department Hangu on 02/10/2015, for court proceedings and litigation on behalf of the Government of Khyber Pakhtunkhwa LG&RDD, and others.


It is further directed to coordinate with Government pleader of Khyber Pakhtunkhwa Services Tribunal to defend the case on behalf of prescribed respondents.

  
Assistant Director,  
LG & RDD Hangu.

**Even No. & Date:**

**Copy for information to the:**

1. Director General LG & RDD Khyber Pakhtunkhwa, Peshawar.
2. P.S to Secretary, LG&RDD, Khyber Pakhtunkhwa, Peshawar.

  
Assistant Director,  
LG & RDD Hangu.

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

**REPLY OF SERVICE APPEAL NO. 979/2015.**

Mohammad Nasir Khan

Versus.

1. Secretary, Local Government and Rural Development Department, Khyber Pakhtunkhwa Peshawar.
2. Director General, Local Government and Rural Development Department, Khyber Pakhtunkhwa Peshawar.
3. Assistant Director, Local Government and Rural Development Department, Hangu.

**Respectfully Sheweth:-**

The Para-wise replies in the subject Service Appeal are as under:-

**PRELIMINARY OBJECTIONS**

1. That the appellant has got no cause of action to file instant appeal.
2. That the appellant has got no locus standi.
3. That the instant appeal is not maintainable.
4. That the instant appeal is barred by law.

**FACTS**

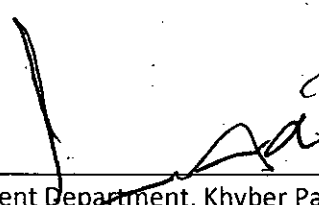
1. **Correct**, the appellant was appointed as Assistant in the Office of the Assistant Director LG & RDD Hangu in the year 2012.
2. **Incorrect**, the appellant was transferred vide Order No. Director(LG)3-4/Posting/Transfer/2013 dated 30/06/2014 purely on Administrative grounds and no malafide and personal interest of any one is involved in this regard.
3. Pertains to record.
4. **Incorrect**, no political intentions/ motivation were involved in the impugned order dated 18/08/2015.

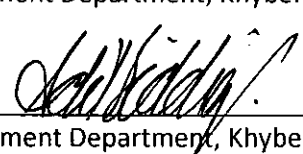
5. **Correct**, the departmental appeal filed by the appellant was rejected in accordance with the rules.

**GROUNDS.**

1. **Incorrect**, the impugned order as well as appellate order is legal, lawful and effective as per rules.
2. **Incorrect**, the same is in-sequence with the principles of natural justice.
3. **Incorrect**, all the codal formalities have been accordingly fulfilled by the Competent Authority and posting/ transfer is a routine matter in the Public Service with no malifide and prejudice.
4. **Incorrect**, the rules and laws have been followed as per instructions and ESTA Code etc.
5. **Incorrect**, due respect is being given to all Government Servants and the story narrated by the appellant is just to gain sympathy of the Court.
6. **Incorrect**, it is important to mention that the appellant is although not involved in an Inquiry but in a complaint may be.
7. Pertains to personal matter of appellant.
8. **Incorrect**, the appellant and his family seems to be residing in the native village and the order was not issued with single stroke of pen.
9. **Correct**, the appellant is working as Assistant in the Office of the Assistant Director LG & RDD Hangu.
10. Pertains to personal matter hence no comments.
11. **Incorrect**, the orders have been issued as per Appointment, Posting & Transfer (APT) Rules and no pressure was exerted on the respondents.
12. **Incorrect**, no such application relating to this matter has been submitted thereof.
13. **Incorrect**, the transfer order is issued as per ESTA Code & APT rules and Policy.
14. **Incorrect**, the impugned order as well as appellate order was passed as per ESTA Code & APT rules and Policy.
15. **Incorrect**, the appellant has been transferred subject to fulfillment of all codal formalities .

It is therefore, requested that the Service Appeal of the appellant may be dismissed in the Public interest, please.

1. Secretary,   
Local Government and Rural Development Department, Khyber Pakhtunkhwa Peshawar.

2. Director General,   
Local Government and Rural Development Department, Khyber Pakhtunkhwa Peshawar.

3. Assistant Director,   
Local Government and Rural Development Department, Hangu.

4. Assistant Director,   
Local Government and Rural Development Department, Kohat.

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

**SERVICE APPEAL NO. 979/2015.**

Mohammad Nasir Khan  
Versus  
Government of Khyber Pakhtunkhwa etc.

**APPLICATION FOR INTERIM RELIEF/ REPLY.**

Respectfully Sheweth:-

1. **Incorrect**, the Learned Court/ Tribunal has fixed the date of 02/12/2015.
2. **Correct.**
3. **Incorrect**, the order dated 18/08/2015 has been issued as per APT Rules and ESTA Code Policy.
4. **Correct.**
5. **Incorrect**, the case has got prima-facie disfavor and balance of convenience lies in favor of the respondents.
6. **Incorrect**, there is no ir-repairable loss to the appellant, if he is transferred from one station to another.

It is therefore, requested that the impugned order dated 18/08/2015 may be restored, please.

1. Secretary,  
Local Government and Rural Development Department, Khyber Pakhtunkhwa Peshawar.
2. Director General,  
Local Government and Rural Development Department, Khyber Pakhtunkhwa Peshawar.
3. Assistant Director,  
Local Government and Rural Development Department, Hangu.
4. Assistant Director,  
Local Government and Rural Development Department, Kohat.



**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 486 /ST

Dated 28 / 3 / 2016

To

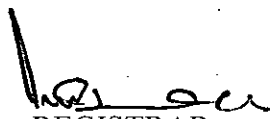
The Director General Health Services,  
Local Govt & Rural Development Department Peshawar.

Subject: -

**JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 22.3.2016 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.