

COC Application in SA No. 402/2015

20.08.2015

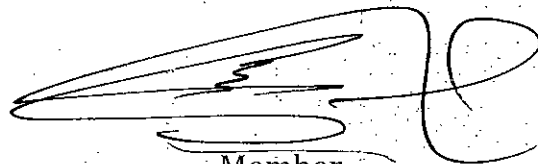
Applicant with counsel, Mr. Ziaullah, GP with Kibaz Khan, SO and Yar Gul, Assistant for respondents No. 1 & 2 and private respondent No. 3 with counsel present. Since Service Appeal No. 402/2015 of the appellant has been disposed off, therefore, the instant application being infructuous is filed. File be consigned to the record room.

ANNOUNCED

20.08.2015.



Member



Member

4

13.07.2015


Counsel for the petitioner, Dr. Parvez Kamal, DG Health in person alongwith Qibaz Khan, SO and Yar Gul, Senior Clerk with Addl: A.G for respondents present. To come up for reply and arguments on 28.7.2015 before S.B.


Chairman

5

28.07.2015

Petitioner with counsel, Mr. Qibaz Khan, SO for official respondents alongwith Addl: A.G and counsel for private respondent No. 3 present. Written replies submitted. Since the original appeal has been assigned to D.B as such the instant petition is also assigned to D.B for further proceedings/arguments on 3.8.2015.


Chairman

3.8.2015

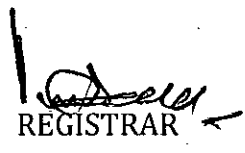


Appellant with counsel, Sr.GP with Yar Gul, Asstt. and Qibas Khan, SO for official respondents and private respondent No. 4 in person. The learned Member (Judicial) is on leave, therefore, case to come up for further proceedings/arguments on 20-08-2015.


MEMBER

FORM OF ORDER SHEET

Court of _____

C.O.C Application No. 62 /2015

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	18/06/2015	<p style="text-align: center;">The C.O.C application submitted by Dr. Shamsul Haq through Amanullah Marwat Advocate may be entered in the relevant Register and put up to the Court for proper order please.</p> <div style="text-align: right;">  REGISTRAR </div>
2-	22-6-15	<p style="text-align: center;">This C.O.C application be put up before S. Bench on <u>23-6-2015</u>.</p> <div style="text-align: right;">  CHAIRMAN </div>
3	23.06.2015	<p style="text-align: center;">Applicant with counsel present. Fresh Wakalat Nama submitted. Notice to respondents be issued for 13.7.2015 before S.B.</p> <div style="text-align: right;">  Chairman </div>

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR

COC No. 62 of 2015

IN

Service Appeal No.402 /2015

Dr. Shams-ul-Haq.....Applicant

VERSUS

Dr. Parvez Kamal and another.....Respondents

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S.No	Description of Documents	Annex	Pages
1.	Grounds of COC with affidavit		1-5
2.	Copies of court orders and applications etc		6-11
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4.	Copies of supportive documents with regard to the violation of orders of Court		17-23
5.	Wakalat Nama		

Applicant/ Appellant

Through


AMANULLAH MARWAT
Advocate Peshawar

Dated: 18.06.2015

1

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR

COC No. 62 of 2015

IN

Service Appeal No.402 /2015

P.W.F Province
Service Tribunal
Disty No. 5/6
dated 18/6/15

Dr. Shams-ul-Haq S/o Habib-ul-Haq

R/o NC Flat No.106, Khyber Road, Peshawar.....Applicant

V E R S U S

1. Dr. Parvez Kamal
Director General Health Services Khyber Pakhtunkhwa
2. Mr. Mushtaq Khan Jadoon
Secretary Health of Khyber Pakhtunkhwa & others
3. Dr. Abdul Rauf DGHS office Peshawar Respondents

**PETITION FOR INITIATING CONTEMPT
OF COURT PROCEEDING AGAINST THE
RESPONDENTS IN VIOLATING OF THE
LAWFUL ORDERS PASSED BY
HONORABLE COURT OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
DATED 13.5.2015, 29.5.2015 & 8.6. 2015.**

Respectfully Sheweth:

1. That the Petitioner was transferred from the post Deputy Director (Admn) DGHS office Peshawar to the post of Deputy DHO Abbottabad on 29.01.2015 while he, being a heart patient was admitted / under

treatment in Cardiac Care Unit HMC Hayatabad. The petitioner is member of Health Management Cadre while the Incumbent (Dr. Abdur Rauf) is a general cadre doctor and hence, cannot be posted on this post, being a post of Management Cadre as per relevant rules. More so the Petitioner has not completed his tenure on the present post.

2. That the Petitioner filed a departmental appeal against the impugned order which was not decided.
3. On expiry of the statutory period, a service appeal was filed before this honorable court, vide Service Appeal No 402 /of 2015 which came up for hearing on 13.05.2015. This honorable court was pleased to pass order which is reproduced as under:

“Till then status-quo be maintained”

The same order was conveyed to DGHS under an application for implementation vide DGHS office Dairy No. 4713 dated 14.5.2015 but the petitioner was not allowed to perform his duty as Deputy Director (Admn) and the Incumbent (Dr. Abdur Rauf) is, illegally performing duty of Deputy Director (Admn) as well as Director (Admn) as a dual charge.

4. That this honorable court was pleased to pass another order on 29.05.2015 which is reproduced as under:

“Till the next date of hearing the impugned order shall remain under suspension”

This order was also conveyed to DGHS with another application vide DGHS office Diary No. 16486 dated 1.6.2015 but again but the petitioner was not allowed to perform his duty as Deputy Director (Admn) and the Incumbent (Dr.Abdur Rauf)is illegally performing the duty of Deputy Director (Admn) as well as Director Admn; as a dual charge.

5. That this honorable court passed a third order on 8.6.2015, which is reproduced as under:

“ Till the next date of hearing, the impugned order stands suspended to the extent of appellant “

Which was also conveyed to respondents with application vide DGHS Diary No. 17381 dated 10.6.2015 and Secretary Health Diary No.6592 dated 10.6.2015. But the petitioner was still not allowed to perform his duty as Deputy Director (Admn) and the Incumbent (Dr. Abdur Rauf) is illegally performing the duty of Deputy Director (Admn) as well as Director Admn; as a dual charge.

6. Original copies of court orders mentioned in Para 3, 4 & 5 and photocopies of same along with applications which were submitted to the respondents are placed at Annexure-A.). Other relevant papers as proof of illegally performed duty by Dr. Abdur Rauf (the Incumbent) as DD(Admn) are attached at Annexure-B.
7. That the respondents have willfully and deliberately violated the lawful orders of this honorable court

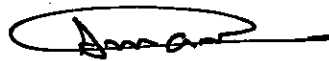
(4)

and still bent upon to violate the court orders, thus exposed themselves for initiating Contempt of Court proceeding.

It is, therefore, respectfully prayed that on acceptance of this petition, the respondents may please be personally called to the court and be proceeded in Contempt of Court for willful violation of court orders dated 13.5.2015, 29.5.2015 and 8.6.2015, passed by this honorable court.

Applicant

Through



AMAN ULLAH MARWAT
Advocate Peshawar

Dated: 18.06.2015

5

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR

COC No. _____ of 2015

IN

Service Appeal No.402 /2015

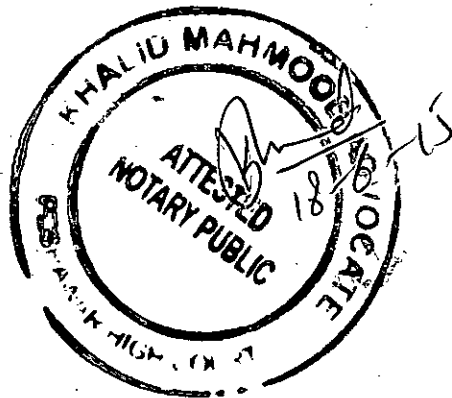
Dr. Shams-ul-Haq.....Applicant

VERSUS

Dr. Parvez Kamal and another.....Respondents

AFFIDAVIT

I, Dr. Shams-ul-Haq S/o Habib-ul-Haq R/o NC Flat No.106, Khyber Road, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying C.O.C are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



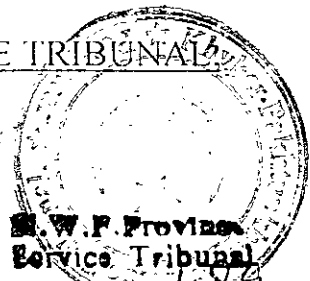

DEPONENT

(6)

Annexure A

(4)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR



K. W. P. Province
Service Tribunal

Diary No. 489

Dated 28/4/15

Service Appeal No. 402 / of 2015

Dr. Shamsul Haq son of Habib ul Haq,
resident of NC Flats # 106, Khyber Road,
Peshawar Cantt... .. Appellant

VERSUS

1. Secretary Health Government of Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
3. Director General Health, Khyber Pakhtunkhwa Peshawar... .. Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER OF RESPONDENT No.1 DATED 29.1.2015 TRANSFERRING THE APPELLANT FROM THE POST OF DEPUTY DIRECTOR (ADMN) DGHS OFFICE TO THE POST OF DEPUTY DHO ABBOTTABAD.

ad to-489
Register
5/5/2015

Respectfully Sheweth:

1. That the appellant is serving in the Health Department since 1.10.1987 and has remained at various posts since then. (Copy of his Service Experience Certificate is attached as annexure 'A').
2. That the appellant was transferred as Deputy Director (Admn) DGHS Khyber Pakhtunkhwa Peshawar on 30.09.2013. (Copy of transfer letter dated 30.09.2013 is attached as annexure 'B').

mitted to-489
led.

Register 5/5/2015

ATTACHED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

29.05.2015

Appellant with counsel; M/S Sabir Khan, SO and Yar Gul, Senior Clerk alongwith Assistant A.G for respondents present. Requested for adjournment as written reply has not be prepared.

One Dr. Abdur Rauf petitioner has submitted application for his impleadment as respondent.. He has also submitted another application for suspending the order dated 15.5.2015. To come up for replies and arguments on applications on 8.6.2015 before S.B. Till the next date of hearing the impugned order shall remain under suspension.


Chairman

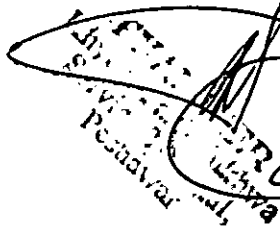
08.06.2015

Appellant with counsel (Mian Muhibullah Kakakhel, Advocate), M/S Sabir Khan, S.O and Yar Gul, Senior Clerk alongwith Mr.Usman Ghani, Sr.G.P for respondents and counsel for applicant present. At the very outset, learned counsel for the appellant requested for withdrawal of his Wakalat Nama. In view of the request of the learned counsel for the appellant, his Wakalat Nama stands withdrawn. Para-wise comments on behalf of respondents No.1 to 3 submitted.

Learned counsel for the applicant Dr. Abdur Rauf argued that he is a necessary party as he is posted against the position impugned by the appellant. In view of the submission of learned counsel for the applicant, the applicant is allowed to contest the appeal. The same is assigned to D.B for rejoinder and final hearing for 22.6.2015. Till the next of hearing, the impugned order stands suspended to the extent of appellant.


Chairman

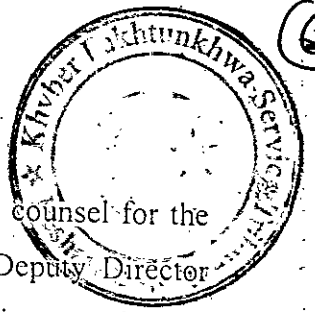
ATTESTED



13.05.2015

8

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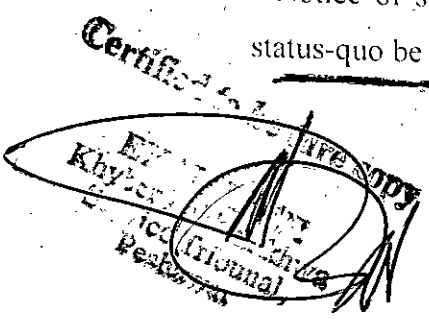
Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Deputy Director (Admn) in Provincial Health Department and vide impugned order dated 29.01.2015 he was pre-maturely transferred from the post of Deputy Director (Admn) DGHS Office and posted as Deputy DHO Abbottabad. That the appellant preferred departmental appeal against the said order on 29.01.2015 which remained un-responded and hence the present service appeal on 05.05.2015.

That the services of the appellant are that of Management Cadre and his posting to General Cadre is violative of the rules. That the pre-mature transfer~~ed~~ is also violative of the posting/transfer policy of the Provincial Government, more particularly Rule-4 of the said rules which guarantees normal tenure of 3 years. That the impugned order is passed due to political intervention and that the appellant is seriously ill and not even in a position to travel having 13 stunts.

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 29.05.2015 before S.B. Notice of stay application be issued for the date fixed. Till then status-quo be maintained.

Amount Deposited.
Process Fee

[Handwritten signature]



[Handwritten signature]
Chairman

Date

15.6.2015

1200

[Handwritten signature]

[Handwritten signature]

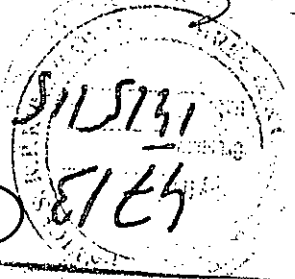
Date

15.6.2015

15.6.2015

No

The Director General Health Services
Khyber Pakhtunkhwa, Peshawar



(2)

(3)

SUB:- Court Stay order in my transfer case.

Dear Sir,

It is humbly submitted that the
Chairman of Khyber Pakhtunkhwa
Transfer Court of Khyber Pakhtunkhwa
has ordered stay order in my transfer
case on 13.5.2015. (copy of order sheet
is enclosed herewith)

As I have not been re-
appointed
The charges of DD(Adm) DCHS, now taken
over the charge of new assignment (DDHO
Assistant), therefore I am to continue
my duty as DD(Adm) DCHS.

It is further requested that
for the month of March 2015 onward
I may also be released from
your faithfully

Dated 14.5.15

C. J.

Dr. Shamsul Haq
DDA DCHS

(Co)
photocopy of the original Notes

DGHS (60)
Diary No 16486
1.6.15

OFFICE NOTE:-
2015.

DATED 29th May,

In continuation of Khyber Pakhtunkhwa Service Tribunal order dated 13th May, 2015

Submitted to Director General Health Service office on 14th May, 2015.

Today on 29th May, 2015, the Honorable court of Chairman Khyber Pakhtunkhwa Service Tribunal suspended the impugned order of my transfer to Abbotabad

(Copy submitted).

It is therefore requested once again, that all concerned sections may be directed to continue the routine process through my office as was before my transfer order, now held suspended.

It is further requested that my salary etc may be released with effect from 1st March, 2015


(DR SHAMS-UL-HAQ)
DEPUTY DIRECTOR (ADMN)

✓
Director General Health Service.

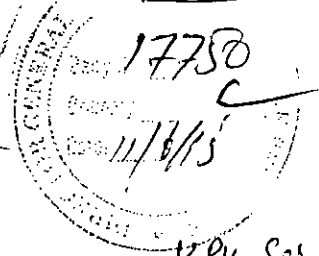


To

(11)

Dated 10-6-15

The D.G.H.S K.P.K
Pescawar



17381
10.6.15

K.P.K. Service Tribunal

SUBJECT:- Implementation of Court orders
dated 13-5-15, 29-5-15 & 8-6-15

Dear Sir,

It is in continuation of previous requests alongwith orders of Honorable K.P.K. Service Tribunal dated 13-5-15, 29-5-15 and now dated 8-6-15 wherein the honorable court has clearly ordered / suspended my the impugned order of my transfer dated 29-1-15 but it is regretted that no action / implementation of the court orders ^{has been} taken including release of my salary which is stopped for the 4 1/2 months. All the above orders have been submitted to your office vide diary No. 4713 dt 14-5-15, No 16682 dt 2-6-15 and No 17381 dt: 10-6-15

It is once again requested that to please order for implementation of court orders & release my stopped salary as my school going children are suffering badly. I have got Gold loan from N.B.P. Khyber Bazar against my wife gold which is also expended yours faithfully
 Dr. Shamsul Haq
 Secretary Health Cantt & K.P.K.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 402 / of 2015

Dr. Shamsul Haq son of Habib ul Haq,
resident of NC Flats # 106, Khyber Road,
Peshawar Cantt... .. Appellant

VERSUS

1. Secretary Health Government of Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
3. Director General Health, Khyber Pakhtunkhwa Peshawar... .. Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER OF RESPONDENT No.1 DATED 29.1.2015 TRANSFERRING THE APPELLANT FROM THE POST OF DEPUTY DIRECTOR (ADMN) DGHS OFFICE TO THE POST OF DEPUTY DHO ABBOTTABAD.

Respectfully Sheweth:

1. That the appellant is serving in the Health Department since 1.10.1987 and has remained at various posts since then. (Copy of his Service Experience Certificate is attached as annexure 'A').
2. That the appellant was transferred as Deputy Director (Admn) DGHS Khyber Pakhtunkhwa Peshawar on 30.09.2013. (Copy of transfer letter dated 30.09.2013 is attached as annexure 'B').

2

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3. That the appellant was transferred to Abbottabad against the post of Deputy DHO Abbottabad on 29.1.2015. (Copy of the transfer order dated 29.1.2015 is attached as annexure 'C').
4. That the appellant filed a Departmental Representation against the impugned transfer order dated 29.1.2015 which has not yet been decided and the statutory period having expired the appellant files the present appeal. (Copy of the representation is attached as annexure 'D').
5. That the appellant is suffering from coronary heart disease and was admitted in Post Graduate Medical Institute for treatment, investigation and analysis. The appellant was advised to remain within the station limits and neither to travel nor to expose himself to extreme heat or cool. The appellant was allowed 2 weeks leave on medical grounds by respondent No.3. On 6.2.2015, subsequently he was allowed similar leave upto 15.4.2015 in line with the decision of Standing Medical Board by respondent No.3. (Copies of the Medical documents are attached as annexure 'E').
6. That during pendency of the sick leave, the Health Minister Khyber Pakhtunkhwa took a benefit of his absence and got the appellant transferred vide the impugned order to bring in a person of his own choice. (Copy of the Summary sent to the Chief Minister Khyber Pakhtunkhwa dated 30.12.2014 having the wish of the Health Minister Khyber Pakhtunkhwa dated 30.12.2014 is attached as annexure 'F').
7. That salary of the appellant was stopped on the orders of the Health Minister mentioned above. (Copy of the letter stopping salary of the appellant is attached as annexure 'G').

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14

8. That the appellant is a Management Cadre Doctor and the General and Management Cadre of the doctors was statutorily separated vide relevant law. The Doctors of General Cadre cannot be appointed against the Executive and Management posts under the rules. The incumbent Doctor Rauf Khattak who is being brought in place of the appellant is a General Cadre Doctor who has served at Karak for only 3 months, hence the tenure of both the appellant and the incumbent were not complete.
9. That the impugned transfer order dated 29.1.2015 is illegal, without jurisdiction and without lawful authority.
10. That the law relating to the tenure of Civil Servants and policy thereon has been violated just to satisfy the whims of the Health Minister and Chief Minister.
11. That the appellant is a chronic Heart patient and was advised to stay at the station of his appointment and is under extreme medical care of his physicians.
12. That the law laid down by the superior Courts is that no transfer can be made on the behest of the Minister and also the tenure of both the transferred officials shall be ordinarily complete unless strong public exigencies are involved. In this case there is neither strong public exigency involved nor the incumbent holds requisite managerial degree to occupy the post, thus the law laid down by the superior Courts in this respect has been violated.
13. That the appellant has not been treated in accordance with law and has been discriminated against.
14. That the rules of Audi alteram partem have utterly been violated as the malafides and political influence is so apparent that the appellant's representation was also not even decided in negative.

(2)

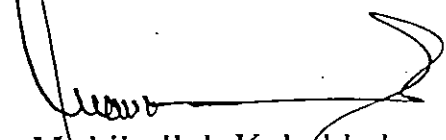
15

It is, therefore, humbly prayed that on acceptance of this Service Appeal the impugned order of transfer dated 29.1.2015 qua the appellant may be set aside and the appellant may be allowed to continue his remaining period of tenure at the present post under the rules.

Any other order deemed appropriate in the circumstances of the case may also be passed. The appellant may be allowed to put forward any other argument/document at the time of hearing of this Service Appeal.


Appellant

Through:



Mian Muhibullah Kakakhel
Senior Advocate,
Supreme Court of Pakistan
And

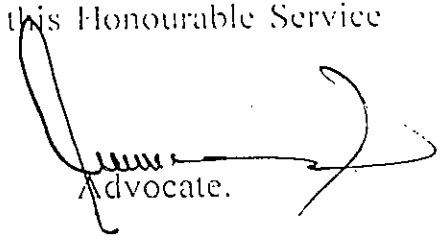
(Saifullah Muhib)
Advocate,

Kakakhel Law Associates
(Advocates & Legal Consultants)
36-C, 2nd Floor Cantonment Plaza,
Saddar Road, Peshawar Cantt
Cell # 0333-9167424

Dated: 28.04.2015

CERTIFICATE:

Certified that as per instructions of my client no such Service Appeal on behalf of the appellant has earlier been filed in this Honourable Service Tribunal on the subject matter.


Advocate.



(16)

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR

COC No. _____ of 2015

IN

Service Appeal No.402 /2015

Dr. Shams-ul-Haq.....Applicant

VERSUS

Dr. Parvez Kamal and another.....Respondents

ADDRESSES OF PARTIES


APPELLANT

Dr. Shams-ul-Haq S/o Habib-ul-Haq
R/o NC Flat No.106, Khyber Road, Peshawar

RESPONDENTS

1. Dr. Parvez Kamal
Director General Health Services Khyber Pakhtunkhwa
2. Mr. Mushtaq Khan Jadoon
Secretary Health of Khyber Pakhtunkhwa & others
3. *Dr. Abdul Rauf DGHS office Peshawar*

Applicant/ Appellant
Through


AMAN ULLAH MARWAT
Advocate Peshawar

Dated: 18.06.2015



(17)

Annex B
(18)

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

Service Appeal No.402/2015

Dr. Shamsul Haq

V/S

Health Department.

NOTICE be
issued to
the respondents
for the date
fixed
24/5

**Application for Suspending the Inter
Office Note dated 15.5.2015 Passed by the
Appellant in violation and
misinterpretation of the Honourable
Tribunal order dated 13.5.2015.**

RESPECTFULLY SHEWETH:

1. That the above noted appeal is subjudiced before this Honourable Tribunal and is now fixed for 29.5.2015 before S.B.
2. That the appeal was heard in preliminary on 13.5.2015 and the Honourable Tribunal was kind enough to pass an order of Status-quo to be maintained till 29.5.2015.
3. That the impugned order was passed on 29.1.2015 in pursuance of which the applicant took over charge on 2.2.2015 and the appellant was relieved by DG Health Service on 20.2.2015 with the direction to report to his new place of posting. Copies of Charge Report and Relieving Order are attached as Annexure-A-1 and A-2.
4. That keeping in view the situation, the august Tribunal passed the order of status-quo to be maintained which means that to remain the situation as it was on 13.5.2015.
5. That the appellant by misinterpreting the order of the Honourable Tribunal passed and inter office note



dated 15.5.2015 wherein he has shown himself to continue his duty as Deputy Director (Admn:). DG Health Services, Peshawar and also occupied the office forcibly by breaking the locks of the office of the D.D.A DG Health Services, Peshawar. Copy of Office Note is attached as Annexure-A-3.

- 6. That since embarrassing position has been created by the appellant by giving his own interpretation to status-quo order which needs proper legal interpretation by this Honourable Tribunal to avoid any untoward incident between the two officers.

It is, therefore, mot humbly prayed that the inter office note dated 15.5.2015 issued by the appellant may be suspended till proper interpretation of status-quo issued by this Honourable Tribunal on 13.5.2015. Any other remedy which this Honourable Tribunal deems fit and appropriate that may also be awarded in favour of applicant/petitioner.

PETITIONER/APPLICANT

Dr. Abdur Rauf
Dy: Director (Admn:),
DG, Health Services, Peshawar.

Through:

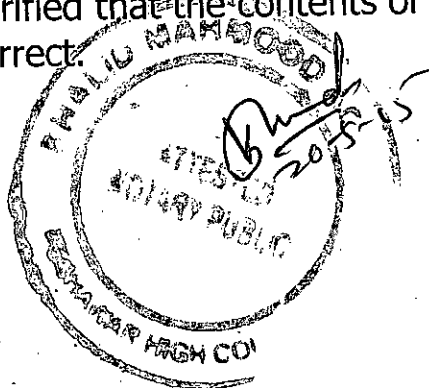
(Signature)
(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

&

(Signature)
(TAIMUR ALI KHAN)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

It is verified that the contents of the above Application are true and correct.



(Signature)
(Signature)

79 (12)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR
APPEAL NO.402 OF 2015

Dr. Shamsul

Haq.....Petitioner.


Versus

Secretary Health Government of KPK and others
Respondent.

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE ORDER OF RESPONDENT No.1 DATED 29.1.2015 TRANSFERRING THE APPELLANT FROM THE POST OF DEPUTY DIRECTOR (ADMN) DGHS OFFICE TO THE POST OF DEPUTY DHO ABBOTTABAD.

NO OBJECTION CERTIFICATE

This Directorate has got No Objection, if Dr. Abdul Rauf Khan Deputy Director (Admn) of this Directorate becomes party in the instant case.


06/06/15

Director General Health Services,
Khyber Pakhtunkhwa Peshawar





26 (18)

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

*All communications should be addressed to The Director General
Health Services Peshawar and not to any official by name.*
Office Ph (091-9210269 Exchange Ph 091-9210187, 091-9210196 Fax (091-9210230

OFFICE ORDER

In pursuance of instruction contained in Govt: letter No. SO (Drugs) HD/2-43/2015/NBMH dated 24.04.2015, the following officers are hereby nominated as "FOCAL PERSON" for the Health institution noted against each.

S.#	NAME OF OFFICER	INSTITUTION
1.	Dr. Abdur Rauf (BS-19) Deputy Director (Admn) DGHS, KPK Peshawar	Naseerullah Khan Babar Memorial Hospital Kohat Road Peshawar
2.	Dr. Shaheen Afridi (BS-19) Deputy Director (Public Health) DGHS office KPK Peshawar.	Sifwat Ghayur Memorial Hospital Peshawar/Govt: Maternity Hospital Peshawar
3.	Dr. Obaid-ur-Rahman (BS-19) Deputy Director (Personnel) DGHS office KPK Peshawar	Sarhad Hospital for Psychiatric Diseases Peshawar (Mental Hospital Peshawar)
4.	Dr. Qaiser Ali (BS-19) Deputy Director (Reproductive Health) DGHS KPK Peshawar	Services Hospital Peshawar
5.	Dr. Jamal Akbar AD (PH) DGHS, KPK Peshawar	Molvi Ameer Shah Memorial Hospital Peshawar

Sd/xxxxxx
Director General Health,
Services Khyber Pakhtunkhwa.

No. 9565-75 /E-I.

Dated: 2 / 6 / 2015.

Copy forwarded to the :-

1. Secretary to Govt: of Health Department for information w/r to his letter No. letter No. SO (Drugs) HD/2-43/2015/NBMH dated 24.04.2015.
2. Dr. Abdur Rauf (BS-19) Deputy Director (Admn) DGHS, KPK Peshawar.
3. Dr. Shaheen Afridi (BS-19) Deputy Director (Public Health) DGHS office KPK Peshawar.
4. Dr. Qaiser Ali (BS-19) Deputy Director (Reproductive Health) DGHS KPK Peshawar.
5. Dr. Obaid-ur-Rahman (BS-19) Deputy Director (Personnel) DGHS office KPK Peshawar.
6. Dr. Jamal Akbar AD (PH) DGHS KPK Peshawar.
7. M.S Govt: Naseerullah Khan Babar Memorial Hospital Kohat Road Peshawar.
8. M.S Sifwat Ghayur Memorial Hospital Peshawar.
9. M.S Molvi Ameer Shah Memorial Hospital Peshawar.
10. M.S Services Hospital Peshawar.
11. P.A to DGHS KPK Peshawar.
For information & necessary action.

Assistant Director (P-I)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

21

(S)

PUC at page-49

dated 26.05.2015

PUC at page-49 and 53. The PUCs only for information and may be filed please.

PUC at page-51.

Mr. Noor-Ullah Khan Restorer attached to Telephone Exchange DGHS office has submitted an application and stated that he availed 90-days earned leave granted by your good honour at page-47, which is going to be ended on 20.6.2015, but some domestic problems in his home due to which he is unable to attend the office for duty.

He has requested that four month earned leave may kindly be extended.

Submitted for perusal / order please.

ADP
27-5-2015

AD (P/II)

Since he has reported arrival for duty on 22/4/2015 performing duty, he should apply for further leave afresh.

22/5/15

What is his problem? Why is he extending his leave without any good reason - Docum

ADP-II / D. Asst.

DOP i. May be rejected

Dr. Adm

Perf. (S)

1.6.15

Rhsia 1.6.15

Rhsia

28.5.15

P-10

(S)

Enc at Page-I 10/6/15

02

The Dist Health Officer Abbottabad has stated that the building of Civil Hospital Khaira Gali (Abbottabad) is more than 70 years old and at the time of construction of the hospital there was no population around the same and most of the land was undeveloped and vacant. The plot No. of the hospital is as "32".

03

He has further stated that the owner of plot no. 38 (Malik Ishtaq) is trying to encroach at the land of C.H. Khaira Gali for his approach road to his plot illegally.

04

C.W. Department Abbottabad constructed a safety wall at the back side of the hospital building for road safety.

05

The DHO Abbottabad has stated that he has requested the Revenue Department as well as Gallyat Devr Authority Abbottabad for the demarcation of said land but with no fruitful result as yet.

06

May the case be referred to the Health Department also for further action?

07

Submitted for perusal/order

08

Supdt (Devr)

Para-06 may be processed for
10/6

DDA

Para 06/11 agreed

(Signature)

10/6
17/6
P20

بخدمت صاحب ڈسٹرکٹ ایجوکیشن آفیسر، حیدرآباد، سندھ، پاکستان

صناب عالی

مورد بیان ترمیم شدہ ہے۔ کمر منبرہ کو ایک عرصہ سے کام کیلئے راہ دہندگی جانا ہے

حسین کیلئے منبرہ کو سلاصہ 16.6.2015 سے 19.6.2015 یعنی 4 ایام کی اجازت کیلئے
صدارت منبرہ پاپا جارتی

السماح
15.6.2015

آپ کا فرمانمہ رقم دام ڈسٹرکٹ ایجوکیشن آفیسر، حیدرآباد، سندھ، پاکستان
میں منظور ہے

موضوع 15/6/16 سے 19/6/16 تک
غائبانہ ڈسٹریکٹ ایجوکیشن آفیسر، حیدرآباد، سندھ، پاکستان
کی خدمت میں سربراہانمہ (کام)

Approved + D. Ad...

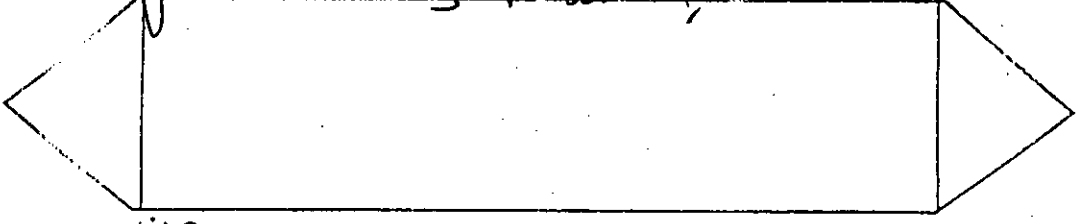
Allowed

[Signature]

15/6/16

[Signature]

بعدالت
Service Tribunal



مورخہ --- Do Show Suit
مقدمہ --- v/s
دعویٰ ---
جرم ---
C.O.C
in
Service Appeal
باعت تحریر آنکہ
20/12/2015

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

آج کے مقام پر کیلئے۔ اعلان کردہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوفہ کے مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور سولی چیک و روپیہ عرضی 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 اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے وکل 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
پرداختہ منظور 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۔

المرقوم 18
ماہ 20

بمقام

Handwritten signatures and stamps at the bottom of the page.