

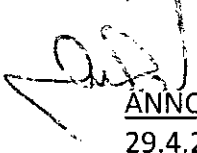
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15.04.2015

Agent of counsel for the appellant present. Counsel for the appellant is not in attendance due to strike of the Bar. Adjourned for preliminary hearing to 29.04.2015 before S.B.

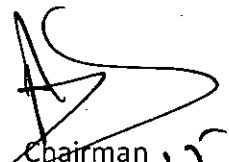
  
Chairman

4  
29.04.2015

None present for appellant. The appeal was called for hearing from time to time but none appeared on behalf of the appellant. The Court time is about to over. The appeal is dismissed for want of prosecution. File be consigned to the record.

  
ANNOUNCED  
29.4.2015

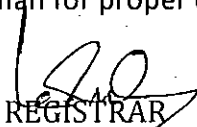


2105-10-71

  
Chairman  
29-04-15

Form- A  
FORM OF ORDER SHEET

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

Case No. 262/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02.04.2015	<p>The appeal of Mr. Mr. Riaz Ahmad resubmitted today by Mr. Amin-ur-Rehman Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	3-4-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>15-04-2015</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

The appeal of Riaz Ahmad son of Mukhtiar Ahmad Assistant Director received to-day i.e. on 24.03.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Status Quo application is unsigned.
- 2- Copy of Arrival report mentioned in para-5 of the memo of appeal (Annexure-F) is not attached with the appeal which may be placed on it.
- 3- Annexures of the appeal may be attested.
- 4- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 381 /S.T,

Dt. 25/3 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Amin-ur-Rehman Adv. Pesh.

*Re-submission*

*Amin*  
31/3/15

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

SERVICE APPEAL NO. 969/2015  
ALONGWITH APPLICATION FOR  
INTERIM RELIEF

Riaz Ahmad..... APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa & others..... RESPONDENTS

**I N D E X**

S.No.	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal		1-7
2.	Affidavit		8
3.	Status Quo Application with Affidavit		8/A-8/B
4.	Addresses of the Parties		9
5.	Copies of Notifications dated 01.09.1993 and 25.07.2013	A & B	10-13
6.	Copy of Employment Record	C	14-17
7.	Copy of Office Order Dated 28.06.2012	D	18
8.	Copy Office Order dated 29.10.2014	E	19
9.	Copy of Arrival Report	F	20
10.	Copies of Application alongwith Form of Leave Account dated 30.11.2014 and Extract From Medical Prescriptions	G-G/1	21-53
11.	Copy of Notification dated 09.12.2014	H	54
12.	Copy of Departmental Appeal/ representation dated 18.12.2014 alongwith Covering Letter	I	55-56
13.	Copy of Office Letter dated 16.02.2015	J	57
14.	Copy of Judgment dated 03.03.2015 of the August Peshawar High Court, Peshawar alongwith memo of Writ Petition.	K	58-68
15.	Wakalatnama		69

THROUGH

**AMIN-UR-REHMAN**

ADVOCATE, PESHAWAR

3-A, PARK AVENUE, BETTANI PLAZA,

UNIVERSITY TOWN, PESHAWAR

CELL No.0321-9022964

DATED: 18.03.2015

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

SERVICE APPEAL NO. 262 /2015  
ALONG WITH APPLICATION FOR  
INTERIM RELIEF

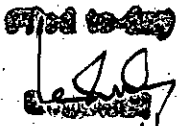
Riaz Ahmad S/o Mukhtiar Ahmad  
R/o Village Manerai, Tehsil & District Swabi  
Assistant Director (under transfer) BS-18,  
Office of the Secretary (LGE&RDD),  
Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar. . . . . APPELLANT

A.W.P. Province  
Service Tribunal  
Diary No. 251  
Dated 24-3-15

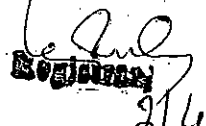
**VERSUS**

1. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. Chief Secretary to Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Secretary to Govt. of Khyber Pakhtunkhwa, LGE&RDD, Civil Secretariat, Peshawar.
4. Accountant General of Khyber Pakhtunkhwa, Fort Road, Peshawar Cantt. . . . . RESPONDENTS

SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, AGAINST NOTIFICATION NO.SO(LG-I)10-433/93 DATED 09.12.2014 OF RESPONDENT NO.3, VIDE WHICH APPELLANT (BPS-18), WAS TRANSFERRED AGAINST LOW GRADE POST i.e. BPS-17, OFFICE LETTER NO.SO(LG-I)10-433/93 DATED 16.02.2015, WHEREBY APPELLANT WAS DIRECTED BY RESPONDENT NO.3 TO ASSUME CHARGE OF THE POST OF A.D, LG&RDD, CHITRAL WITHIN 7 DAYS, OTHERWISE, HE WILL BE PROCEEDED AGAINST UNDER THE KHYBER PAKHTUNKHWA GOVT. SERVANTS (E&D) RULES, 2011 AND IMPLIED REFUSAL OF RESPONDENT NO.3 BY NOT GRANTING TWO YEARS LEAVE WITHOUT PAY TO APPELLANT.

  
24/3/15

re-submitted to-day  
and filed.

  
27/4/15

**PRAYER:** On acceptance of instant Service Appeal, impugned notification dated 09.12.2014, office letter dated 16.02.2015 and implied denial from granting two years leave without pay and all subsequent proceedings, if any, initiated on the basis whereof, may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence be set aside and respondents No.2 & 3 may further be directed to consider application of appellant for two years leave without pay and be allowed in accordance with law, so as to secure the ends of justice.

**Respectfully Sheweth:**

1. That appellant is civil servant within the meaning of section 2(1)(b) of Khyber Pakhtunkhwa Civil Servants Act, 1973 (KP Act No.XVIII of 1973) and was appointed as Assistant Director (BPS-17), vide notification No.SO(LG-I)2-204/90 dated 01.09.1993, on the recommendations of Khyber Pakhtunkhwa Public Service Commission, however, the competent authority/ up-gradation committee approved 17 posts of Assistant Directors/ Planning Officers (LGE&RDD), including appellant, were upgraded from BPS-17 to BPS-18 (personal), vide notification No.SOB(LG)1-4/2003/Vol-II dated 25.07.2013 w.e.f 13.09.2011 (retrospectively).  
(COPIES OF NOTIFICATIONS DATED 01.09.1993 AND 25.07.2013 ARE ATTACHED AS ANNEXURE "A" & "B" RESPECTIVELY).
2. That appellant had remained posted against different positions, including Project Director, Municipal Services Programme, US Aid, TMO Town-II, Peshawar, Project Director (MSDP) etc and always performed duties with zeal and devotion with the entire satisfaction of superiors and having more than 22 years spotless career at his credit.  
(COPY OF EMPLOYMENT RECORD IS ATTACHED AS ANNEXURE "C").

3. That respondent No.2/ competent authority posted appellant as full time Project Director (MSDP), under the supervision of LGE&RDD, on deputation basis, initially for a period of three years, in the public interest, vide office order No.SO(LG-I)2-334/MSDP/2012, dated 28.06.2012.

(COPY OF OFFICE ORDER DATED 28.06.2012 IS ATTACHED AS ANNEXURE "D").

4. That respondent No.3/ Secretary LGE&RDD, Government of Khyber Pakhtunkhwa, while assuming charge of responsibilities, appellant was repatriated prematurely, vide office order No.SO(LG-I)2-334/MSDP/2011 dated 29.10.2014, without mentioning reasons whereof.

(COPY OFFICE ORDER DATED 29.10.2014 IS ATTACHED AS ANNEXURE "E").

5. That appellant, being civil servant and subordinate, obeyed office order dated 29.10.2014 and submitted arrival report to the office of respondent No.3/ Secretary LGE&RDD on 31.10.2014 i.e. on the 2<sup>nd</sup> day of repatriation order.

(COPY OF ARRIVAL REPORT IS ATTACHED AS ANNEXURE "F").

6. That appellant applied for grant of two years leave without pay under the relevant provisions of Khyber Pakhtunkhwa Civil Servants (Revised) Leave Rules, 1981, due to serious illness of his father, suffering from complicated Lungs diseases, since more than two decades and has been declared Cancer patient and referred by the doctors to Shaukat Khanam Memorial Hospital, Lahore, for onward treatment, therefore, appellant has no option, but to proceed with his father, as there exists no legal bar to grant him the desired leave.

(COPIES OF APPLICATION ALONGWITH FORM OF LEAVE ACCOUNT DATED 30.11.2014 AND EXTRACT FROM MEDICAL PRESCRIPTIONS ARE ATTACHED AS ANNEXURE "G" & "G/1" RESPECTIVELY).

7. That respondent No.3, instead to consider application of appellant for leave without pay, got annoyed and issued impugned notification No.SO(LG-I)10-433/93 dated 09.12.2014, vide which he was transferred to Chitral and, that too, against a post of Assistant Director (BPS-17) i.e. low grade.

(COPY OF NOTIFICATION DATED 09.12.2014 IS ATTACHED AS ANNEXURE "H").

8. That appellant feeling aggrieved of impugned notification dated 09.12.2014, preferred departmental representation/ appeal dated 18.12.2014, to respondent No.2/ competent authority/ Chief Secretary, through proper channel i.e. respondent No.3, for grant of two years leave without pay and cancellation of impugned notification ibid, but to no avail so far.

(COPY OF DEPARTMENTAL APPEAL/ REPRESENTATION DATED 18.12.2014 ALONGWITH COVERING LETTER IS ATTACHED AS ANNEXURE "I").

9. That respondent No.3, instead to forward representation/ appeal dated 18.12.2014 of appellant to the competent authority i.e. respondent No.2/ Chief Secretary, for appropriate decision in accordance with law, issued impugned office letter No.SO(LG-I) 10-433/93 dated 16.02.2015, communicated on 19.12.2014, whereby appellant was directed to assume charge of the post of Assistant Director LGE&RDD Chitral, within seven (7) days positively, or ready to face charges of misconduct and proceeding against under the Khyber Pakhtunkhwa Govt. Servants (E&D) Rules, 2011.

(COPY OF OFFICE LETTER DATED 16.02.2015 IS ATTACHED AS ANNEXURE "J").

10. That appellant, feeling dissatisfied due to ill-treatment of the hands of respondent No.3, on the basis of personal grudges and ill-will, was bent upon to humiliate and disgrace appellant and to deteriorate his more than 22 years spotless service career, issued consecutive impugned notifications/ office letters, by extending threats of dire consequences in shape of misconduct charges for non-compliance of his illegal/ impugned notifications and office letters and had no other efficacious remedy, approached the august Peshawar High Court, Peshawar, for redressal of his grievances through Writ Petition No.558/2015, which was dismissed, vide judgment dated 03.03.2015, however, appellant was allowed to seek his legal remedy before appropriate forum, hence the instant appeal, inter alia, on the following grounds,

(COPY OF JUDGMENT DATED 03.03.2015 OF THE AUGUST PESHAWAR HIGH COURT, PESHAWAR ALONGWITH MEMO OF WRIT PETITION IS ATTACHED AS ANNEXURE "K").



**GROUND S:**

- A. That the impugned notification dated 09.12.2014, whereby appellant, being in BPS-18, was transferred to Chitral against the post of Assistant Director BPS-17 and, that too, by not considering his application for leave without pay and subsequent impugned office letter dated 16.02.2015, whereby he was warned to be proceeded against under the Khyber Pakhtunkhwa Govt. Servants (E&D) Rules, 2011 on the charges of misconduct, if he failed to submit arrival report within seven (7) days, is in utter disregard to law and rules governing the subject, rather respondent No.3, author of the impugned notification and office letter, has acted without jurisdiction by stepping into shoes of respondent No.2, the sole competent authority to either repatriate or transfer him or issue warning, therefore, the impugned notification and all subsequent steps thereto, is coram-non-judice, hence deserves to be set at naught.
- B. That appellant, being eldest son, was supposed to proceed with his 68 years old aged father, to Lahore, for advance treatment of his sufferings from serious illness (Cancer), applied for two years leave without pay under the relevant provisions of law and had legal vested right to be granted the same, but astonishingly, his application was neither considered nor result whereof was communicated so far, although, under Rule-12 r/w 23, 29 & 31 of Khyber Pakhtunkhwa Civil Servants (Revised) Leave Rules, 1981, was entitled for 972 days earned leave in view of Leave Account Statement, issued by AGPR, on 01.09.2014 (annexure "G"), however, respondent No.3 did not bother to consider and decide the same in accordance with the existing provisions of law, which speaks volume of malafides on his part. Furthermore, under Rule-23 of the Rules *ibid*, the civil servant may apply for leave, which is due and admissible to him and it shall not be refused on the ground that another type of leave should be taken in the particular circumstances, similarly, under Rule-13 whereof, application for leave must be made to the head of the office where a civil servant is employed and head of the Department, while granting the same, shall notify it in the official gazette, but respondent No.3, entered into another controversy, strange to the normal course of

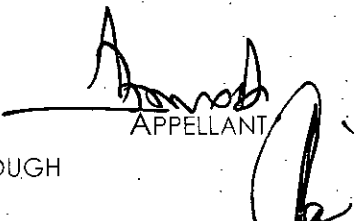
law and is bent upon to compel/ pressurize appellant to surrender before his ego, instead to comply/ surrender before the law, such attitude of respondent No.3 is not only bad in the eye of law, but making him amenable before law, hence indulgence of this Honourable Tribunal is imminent for establishing rule of law and to restrain respondent No.3 from misuse/ abuse of authority, so as to secure the ends of justice.

- C. That appellant was prematurely repatriated by respondent No.3, though, appellant had got cause of action to honour such notification, for being issued by incompetent authority, in view of his appointment as Project Director, for being issued by respondent No.2, the sole competent authority, however, he surrendered before the discipline and obeyed such defective notification, but respondent No.3, instead to put halt to his illegal attitude by humiliating/ disgracing appellant on the basis of personal grudges/ ill-will, issued notifications after notification, which too, issued without lawful authority and the only authority, conferred upon him by the law to grant the desired leave to appellant, was never bothered to act upon, which has caused grave miscarriage of justice.
- D. That curtailment of posting tenure and, particularly, transfer on deputation for stipulated period, is equated to penalty within the meaning of Civil Servants Act, 1973 and Rules framed thereunder, therefore, show cause notice is mandatory and the affectee should have been provided proper opportunity of hearing within the meaning of Article 10-A of the Constitution of Pakistan, 1973, however, appellant has been condemned unheard, therefore, principle of *audi-alterim-partem* is attracted.
- E. That, though appellant is under obligation to obey all orders of superiors, but in accordance with law and, in this regard, binding dictas of the Apex Supreme Court of Pakistan, by restraining Government officials from obeying illegal orders of the superiors, particularly, the principle laid down in prominent case of "Anita Turab", reported in [PLD 2013 SC 195].

- F. That respondent No.3, irrespective of facts and circumstances of the case, disregarded all lawful requests of appellant and, while adopting principle of might is right, issued the impugned notifications on behalf of respondent No.2, for which he was never authorized, either by the law or the said competent authority, therefore, it can safely be adjudged from his actions and inactions that he violated all norms of justice for the sake of ego and to fulfill his inferior designs, without caution and care of its legal consequences, which is unjust, unfair and against the constitutional vested rights of appellant, hence deserves to be proceeded against, in order to ensure fair play and justice.
- G. That any other ground, with the permission of this Honourable Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant Service Appeal, impugned notification dated 09.12.2014, office letter dated 16.02.2015 and implied denial from granting two years leave without pay and all subsequent proceedings, if any, initiated on the basis whereof, may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect, hence be set aside and respondents No.2 & 3 may further be directed to consider application of appellant for two years leave without pay and be allowed in accordance with law, so as to secure the ends of justice.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Tribunal in circumstances of the case may also be granted to the appellant.

  
APPELLANT  
THROUGH  
**AMIN-UR-REHMAN**  
ADVOCATE, PESHAWAR

DATED: 18.03.2015

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

SERVICE APPEAL NO. \_\_\_\_\_/2015  
ALONGWITH APPLICATION FOR  
INTERIM RELIEF

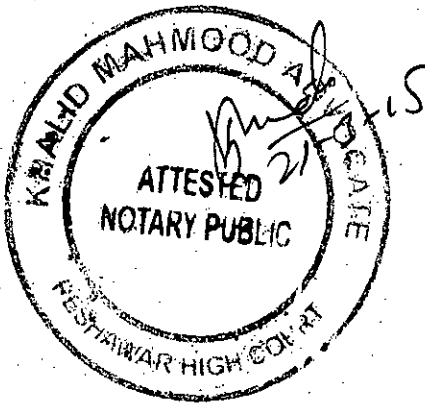
Riaz Ahmad..... **APPELLANT**

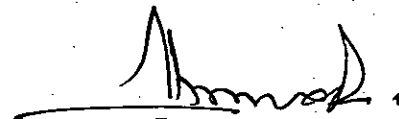
**VERSUS**

Government of Khyber Pakhtunkhwa & others..... **RESPONDENTS**

**AFFIDAVIT**

I, Riaz Ahmad S/o Mukhtiar Ahmad R/o Village Manerai, Tehsil & District Swabi, Assistant Director (under transfer) BS-18, Office of the Secretary (LGE&RDD), Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



  
DEPONENT  
CNIC: 17301-5099095-7

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

C.M.No. \_\_\_\_\_/2015

IN

SERVICE APPEAL NO. \_\_\_\_\_/2015

Riaz Ahmad ..... APPLICANT/APELLANT

VERSUS

Government of Khyber Pakhtunkhwa & others. .... RESPONDENTS

\_\_\_\_\_  
**APPLICATION FOR GRANT OF STATUS QUO TILL  
FINAL DECISION OF THE TITLED SERVICE APPEAL.**  
\_\_\_\_\_

**Respectfully Sheweth:**


1. That the titled Service Appeal is being filed before this Honourable Tribunal.
2. That facts and grounds of the titled Service Appeal may please be considered as integral part and parcel of instant application.
3. That applicant has got good prima facie case in his favour and is very much sanguine of its success, hence deserves to be extended the subject relief.
4. That valuable rights of the applicant are involved and will suffer irreparable loss if the subject relief is not granted.
5. That there is no legal bar to grant the subject relief, rather proprietary demands for maintaining status quo, otherwise, the main appeal would become infructuous.

*Amin-ur-Rahman Khan*  
*Advocate Peshawar*  
*Khan*

It is, therefore, most humbly prayed that on acceptance of instant application, status quo may kindly be maintained till final decision of the titled Service Appeal, so as to secure the ends of justice.

APPLICANT/APELLANT

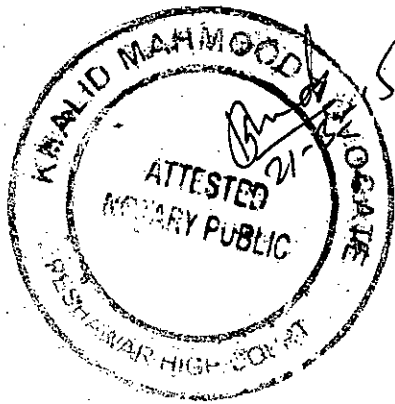
THROUGH


  
**AMIN-UR-REHMAN**  
ADVOCATE, PESHAWAR

DATED: 18.03.2015

**AFFIDAVIT**

I, Riaz Ahmad S/o Mukhtiar Ahmad R/o Village Manerai, Tehsil & District Swabi, Assistant Director (under transfer) BS-18, Office of the Secretary (LGE&RDD), Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



  
DEPONENT  
CNIC: 17301-5099095-7

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

SERVICE APPEAL NO. \_\_\_\_\_/2015  
ALONGWITH APPLICATION FOR  
INTERIM RELIEF

Riaz Ahmad..... APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa & others..... RESPONDENTS

**ADDRESSES OF THE PARTIES**

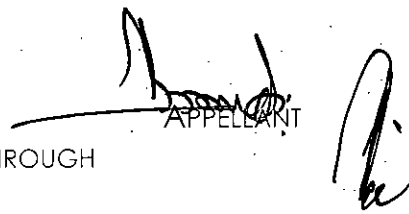
**APPELLANT:**

Riaz Ahmad S/o Mukhtiar Ahmad  
R/o Village Manerai, Tehsil & District Swabi  
Assistant Director (under transfer) BS-18,  
Office of the Secretary (LGE&RDD),  
Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

**RESPONDENTS:**

1. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. Chief Secretary to Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Secretary to Govt. of Khyber Pakhtunkhwa, LGE&RDD, Civil Secretariat, Peshawar.
4. Accountant General of Khyber Pakhtunkhwa, Fort Road, Peshawar Cantt.

THROUGH

  
APPELLANT

**AMIN-UR-REHMAN**  
ADVOCATE, PESHAWAR.

DATED: 18.03.2015

DATED PESHAWAR THE 1st SEPT: " 1993

NOTIFICATION

NO.50(LG-I)-2-204/90.- Consequent upon the recommendations of the NWFP Public Service Commission, the Governor, NWFP is pleased to appoint the following candidates as Assistant Directors in Basic Pay Scale No.17 (2870-315-5450) on temporary basis with effect from the date of their taking over charge:-

1. Mr. Sardar-ul-Mulk S/O Jehani Rome, Malakand Agency.

2. Syed Hasnain Kazmi S/O Mastana Shah, District Mansabera.

3. Mr. Said Rehman S/O Abdul Ghafoor, District Mardan.

4. Mr. Akhtar Muhtir S/O Faqir Mohammad, District Charsadda.

5. Mr. Riaz Ahmad S/O Mukhtar Ahmad, District Swabi.

6. Mr. Sajid Gul S/O Hameed Khan District Dir.

7. Mrs. Khalid Israr Shan S/O Pir Said Badshah, District Bannu.

2. Their appointments will be subject to the following terms and conditions:-

1) They will be governed by the provisions of NWFP Civil Servant Act, 1973 (NWFP Act No. XVII of 1973) and, in matters not specifically mentioned in this notification, shall be governed by such rules and regulations relating to leave, T.A., Medical Attendance, Seniority etc., as have been or may be prescribed from time to time by Government for the category/status of government servants to which they belong.

11) They will be governed by the Government Servants Conduct Rules, 1987, the NWFP Government Servants (Efficiency & Discipline) Rules, 1973 and any other instructions on the subject as may be issued by the Government of NWFP from time to time.

111) They will initially be on probation for a period of two years. Their services will be liable to termination at any time without assigning any reasons before expiry of the period of probation/extended period of probation if their work and conduct during this period is not found satisfactory. In such an event, they will be given a month's notice of termination of service or one month's

ATTESTED

Annex A (10)



(11)

pay in lieu thereof. In case they wish to resign at any time without a month's notice, their pay will be forfeited.

- iv) They have not been previously dismissed or debarred from service of Government, Board, Local Body or Autonomous or Semi Autonomous Organization etc.,
- v) Their employment will not in any case confer upon them any claim or right to permanent employment in the department. They will, however, be eligible for continuance and eventual confirmation on satisfactory completion of probation (including the extended period of probation) if and when a regular substantive vacancy in the post is available for them.
- vi) They will not be entitled to any Travelling Allowance/Daily Allowance on their first appointment except in case of permanent Government Servant.
- vii) They will be liable to serve any-where within or outside NWFP in any post under the Federal Government or any Provincial Government or Local Authority or a Corporation or Body set up or established by any such Government;
- viii) Their pay will be fixed in the Basic Pay Scales of Rs. 2870-215-5450 from the date of their taking over the charge of the post.
- ix) Their inter-se-seniority will be fixed according to the order of merit assigned by the NWFP Public Service Commission.

If the above terms and conditions of appointment are accepted to them, they should immediately communicate their acceptance in writing to this Department and report for duty to the undersigned on or before 15th September, 1993 at the latest, failing which this appointment order may be treated as cancelled in respect of the candidates.

*Attested*  
*[Signature]*

SECRETARY TO GOVERNMENT OF NWFP,  
LOCAL GOVT. ELECTIONS AND RURAL  
DEVELOPMENT DEPARTMENT

Endst. NO. 30(LG-I)2-204/90 Dated the 1ST SEPTEMBER, 1993

Copy forwarded to :-

- 1. The Accountant General, N.W.F.P., Peshawar.

*[Signature]*  
ATTESTED

2. The Director General, LG&RDD, NWFP, Peshawar.
3. The Secretary NWFP Public Service Commission, Peshawar with reference to his letter No.PSC-LG-AD/9996, dated 11-7-1993.
4. Mr.Sardar-Ul-Mulk S/O Jehani Rome, Vill: & P/O Totakan Malakand Agency.
5. Syed Hasnain Kazmi S/O Mastana Shah Moh:Channanai Tehsil and Distt:Mansehra.
6. Mr.Said Rehman S/O Abdul Ghafoor Vill:Fazal Kali P/O Manga P/S Sadar Teh: & Distt:Mardan.
7. Mr.Akhtar Munir S/O Faqir Mohammad Mbh:Uryazai P/O Umarzai Teh: & Distt:Charsadda.
8. Mr.Riaz Ahmad S/O Mukhtar Ahmad, Vill:Maneri Payan Kunda Khel, Teh: & Distt:Swabi.
9. Mr.Sajid Gul S/O Hameed Khan, Research Economist FATA Project, PSR(Unit) Saidu S harif Swat.
10. Mr.S.Khalid Israr Shah S/O Pir Said Badshah P/O Seria Naurang Vill: Nar Pir Mir Abbas Shah Distt:Bannu
11. The Manager Printing Press, Peshawar.
12. Office Order file.

*(Signature)*  
 ( FAZAL UR-REHMAN )  
 SECTION OFFICER-I

H.M/

*(Signature)*  
 ATTESTED

*attested*

*(Signature)*

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13

GOVERNMENT OF KHYBER PAKHTUNKHWA  
LOCAL GOVERNMENT, ELECTIONS & RURAL DEVELOPMENT DEPARTMENT

Dated Peshawar the 25-07-2013.

**NOTIFICATION.**

No.SOB(LG) 1-4/2003/Vol-II. On the recommendations of the Up-gradation Committee in the Finance Department and approval of the Competent Authority, 17 posts of Assistant Directors/Planning Officers, LG,E&RDD are hereby up-graded from BPS-17 to BPS-18 (Personal) and consequently the following officers on the basis of seniority are allowed Personal up-gradation to BPS-18 with effect from 13-09-2011:-

1. Mr.Muhammad Zahoor, AD, FATA Secretariat, Peshawar.
2. Mc.Muhammad Faheem, AD, FATA Secretariat. Peshawar.
3. Mr.Faiz Muhammad, AD, LG,E&RDD/Project Director, SADP, Peshawar.
4. Mr.Israr Ullah, AD, LG,E&RDD, Swabi.
5. Mr.Sardarul-Mulk, AD, LG,E&RDD, Malakand.
6. Mr.Akhtar Munir, AD, LG,E&RDD, Hangu.
7. Mr.Riaz Ahmad, AD, LG,E&RDD/PD, MSDP, Peshawar.
8. Syed Khalid Israr Shah, AD, LG,E&RDD, Lakki Marwat.
9. Mr.Sajid Gul, AD, LG,E&RDD/Secretary, PDA, Peshawar.
10. Mr.Said Rehman, Deputy Director, Dtc: General, LG,E&RDD.
11. Syed Hasnain Kazmi, AD, LG,E&RDD.
12. Mr.Muhammad Jehagir, AD, FATA, Secretariat, Peshawar.
13. Qazi Noorul Wahab, AD, LG,E&RDD, Mohmand Agency.
14. Mr.Alam Zeb, AD, LG,E&RDD, Khyber Agency.
15. Late Sakhi Jan, AD, LG,E&RDD (Deceased).
16. Late Abdul Qadir, AD, LG,E&RDD (Deceased).
17. Qazi Anwar Gul, AD, LG,E&RDD (Retired).

The post shall automatically be downgraded, as and when, vacated by the up-graded Officers.

Sd/xx xx xx  
Secretary to Govt: of Khyber Pakhtunkhwa  
Local Govt:, Elections & Rural Dev: Deptt:

Endst: No.FD/SO(FR)7-14 /2013

dated Peshawar the 26-07-2013.

Copy of the above is forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. All the District /Agency Accounts Officers in Khyber Pakhtunkhwa/FATA.

*F. E. Tahir*  
Section Officer (FR),  
Govt: of Khyber Pakhtunkhwa,  
Finance Department.

Endst: of even No. & Date.

Copy of the above is forwarded to:-

1. The Director General, LG,E&RD, Peshawar.
2. The Director, FATA, LG&RD, Peshawar.
3. All the Assistant Directors, LG&RD in Khyber Pakhtunkhwa/FATA.
4. The Section Officer (FR) Finance Department.
5. The Budget Officer-XI, Finance Department.
6. The Section Officer (Estt:) LG,E&RDD.
7. All the Officers concerned.
8. The PS to the Secretary to Govt: of Khyber Pakhtunkhwa, LG,E&RDD.
9. The PS to the Secretary, Local Council Board, Peshawar.

*Attested*  
*Re*  
*[Signature]*  
Section Officer (Budget)

ATTESTED

Amex C

14

EMPLOYMENT RECORD; (Reverse order)

From	To	Title of Post;
1.07.2012	Till date	Projector Director, Municipal Services Program USAID Funded

Description of Duties

- Defining and articulating MSP's long-term vision and developing strategies for achieving that vision;
- Supervising and supporting administration and operations of the PMU by advising and interfacing with the respective sector specialists;
- Reviewing annual operational plans and budgets that support strategic direction, submitting these for approval and prudently managing PMU's resources within those budget guidelines and according to the prescribed laws and regulations;
- Overseeing planning, design, delivery and quality of various programs, projects and services;
- Managing the human resources of the PMU according to the approved personnel policies and procedures that fully conform to the project policies, government laws and regulations;
- Closely liaising with other government departments, agencies, donors and development organizations;
- Acting as a full time leader to ensure smooth implementation;
- Be responsible for the efficient and judicious utilization of the project finances;
- Developing future leadership within the organization; and
- Any other work assigned by the provincial government

18.05.10	30.6.2012	Administrator /Town Municipal Officer Town 2 Peshawar. PROJECT DIRECTOR MSDP(july2011 till date)
----------	-----------	--

Description of Duties.

- Monitoring & Evaluation of Federal govt schemes and RAHA Schemes.
- Project implementation and Management.
- Administration & Management of Town 2.
- Execution and supervision of Developmental Schemes of Different Projects in multi- sectors.
- Preparation of Presentation of Developmental Activities & Profile.
- Preparation & presentation of PC-Is & tendering documents.
- Liaison among the DCO ,CDG and LCB.
- Participation of community programs in the execution and energization of UNICEP projects.
- Skill and institutional development of town committees and Rural Councils.
- Preparation of PCI and Approval from CDWP and PDWP.
- Liaison with USAID and P&D.
- PREPARATION of MSDP Project and its Financial , HR,M&E and Procurement Manuals.

Attested

ATTESTED

- Opening of different account with State Bank And EAD Islamabad.
- Liaison with the ASP MSDP Consutant.

Date of 1 <sup>st</sup> Appointment;		March 1992,
From 15.11.08	To April 2010	Title of Post; Deputy Director (Monitoring & Evaluation) National Urban Development Project Government Of NWFP Peshawar.

**Description of Duties.**

- Monitoring & Evaluation of National Urban Development Projects in NWFP.
- Project implementation and Management.
- Administration & Management of NUDP.
- Execution and supervision of Developmental Schemes of Different Projects in multi- sectors.
- Preparation of Presentation of Developmental Activities & Profile.
- Preparation & presentation of PC-Is & tendering documents.
- Liaison among the DD Project Implementation Teams and PCU.
- Participation of community programs in the execution and energization of NUDP projects.
- Skill and institutional development of town committees.

09/1993	14.11.08	Assistant Director LG &RDD Govt, of NWFP (BPS.17) Through Public Service Commission.
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Address of Employment. (LG &RDD Govt, of NWFP.)		
--	--	--

**Description of Duties.**

- Rural Development in Rural Area of FATA and NWFP.
- Implementation of rural development Project.
- Community participation.
- Preparation of Developmental Profiles Sector wise and year wise at Agency level.
- Preparation Annual Developmental Programme for different sectors at Agency level.
- Local Govt. Administration at Agency and District Level.
- Administration and Financial Management.
- Execution and supervision of Developmental Schemes of Different Projects in multi- sectors.
- Administration of Project accounts and Govt accounts.

*W. S. Khan*  
*W. S. Khan*

*W. S. Khan*  
**ATTESTED**

- Assistant Project Director of Rural Works Programme and Federal Funded Programme.
- In charge for UNICEF Programme i.e Sanitation and Water Supply.
- Formulating Developmental Policies for the Govt at Agency Level.
- Correspondence and Coordination among different nation building department.
- Preparation of Annual Development Programme for Agency.
- Secretary to Agency Development Sub Committee. (ADSC having the power to approved schemes upto 40 million each.
- Co-coordinator for the Local Bodies activities.
- Formulation and preparation of Progress Reports of all the deptt at Agency Level.
- Preparation of Presentation of Developmental Activities & Profile of the agencies at Khyber, Mohmmmand & Bajour Agency.

From	To	Title of Post:
03/1992	09/1993	Agriculture Officer (Agri, Extension Deptt, Govt, of NWFP.)( BPS.17 )Through FSC.
Address of Employment. AGIRCULTURE DEPARTMENT Govt, of NWFP.)		

#### Description of Duties.

- Sub-division level officer of the deptt.
- Extension of improve and advance agri. Activities & Methods.
- Introduction of advance varieties & techniques for the improvement of Agr, production.
- Awareness of advance commercial agricultural approach.
- Introduction of commercial agri, Marketing.
- Holding of Farmer Field days and Agri, shows.
- Holding of Farmers Training.
- Identification and control of Crops and Plants diseases.
- Introduction of Demonstration Plots and Field Assistants Training.
- Agent of co-ordination between Research Station and Farmers.
- Highlighting of Farmers Problems to the Govt.
- Worked as a Instructor in Agriculture Training Institute Peshawar.

From	To	Title o Post:
07/1991	12/1991	Market Researcher.
Address of Employment. Malakand Fruit & Vegetable Development Project Swat And Kalam Integrated Development Project..)		

#### Description of Duties.

- Conducted Research in Peshawar Fruit & Vegetable Whole sale Markets.
- Introduce Agriculture Marketing Information Programme from Radio Pakistan Peshawar.
- Broadcasting Daily Market NEWS of Fruits & Vegetable from Radio Pakistan

*Attested*

*Attested*  
ATTESTED

Peshawar.

- Broadcasting Weekly marketing summary in the agricultural information programme from Radio Pak. Peshawar.
- Preparation of CBR & IRR for agricultural marketing prices.

**Association with Foreign Funded Projects.**

- Implementation, Management and Monitoring of NAS Scheme, ADB Schemes, Islamic Development Bank Scheme
- Manager and Executing Head of the Local Govt: section in Bajaru Area
- Development Project for 3 years, Mohmand Area Development Project for 3 years, Khyber Area Development Project 3 Years.
- Worked as a executing line depart, Head with (UNICEF Sanitation & Water Supply Programme.
- Worked as a executing line depart, Head with (US AID Water Supply Programme At Orakzai Agency.

**POSTING DURING LAST 15 YEARS.**

* Instructor at ATI Peshawar.	From . Feb,1993 to Sept, 1993.
* AD LG &RDD FATA DG office Peshawar.	From Sept, 1993 to May, 1994
* AD LG &RDD Orakzai Agency .	From May 1994 to Dec, 1996
* AD LG & RDD Mohmmand Agency.	From Jan, 1997 to Jun, 1997
* AD LG &RDD Orakzai Agency. and Kurram Agency.	From Jun, 1997 to July, 1998
*AD LG &RDD (Progress & Monitoring)	From July, 1998 to Nov, 1998
* AD LG & RDD Mohmmand Agency.	From Nov, 1998 to Aug, 2000
* AD LG & RDD Bajaur Agency .	From August, 2000 to Aug,2003
* AD LG&RDD Khyber Agency	From Aug, 2003 to Nov, 2005.
* AD LG&RDD Kurram Agency	From Nov 2005 to March 2006.
* AD LG&RDD Orakzai Agency	From March 2006 to March, 2007.
AD LG & RDD Khyber Agency.	From March, 2007 to Nov,2008.
PD/Deputy Director (M&E) NUDP NWFP ( Lakki Marwat, Hangu, Timergara, Mardan,Swabi, Haripur, Mansehra, Abbotabad	From Nov, 2008 to April,2010
Administrator/Town Municipal Officer Town 2 Peshawar	From 18 <sup>TH</sup> June,2010 to june 2012
Project Director MSDP	From June, 2011to october 2014

*Attestad*  
*[Signature]*

*[Signature]*  
**ATTESTED**

Annex D

18

GOVERNMENT OF KHYBER PAKHTUNKHWA,  
LOCAL GOVERNMENT, ELECTIONS & RURAL  
DEVELOPMENT DEPARTMENT

ORDER

Dated Peshawar the 28<sup>th</sup> June, 2012

No.SO(LG-1)2-334/MSDP/2012.- Consequent upon the approval of the Provincial Project Selection Committee, the Provincial Government in the Local Government, Elections and Rural Development Department is pleased to post Mr.Riaz Ahmad, Assistant Director, LG&RDD (Now TMO, TMA-Town-II, Peshawar) as full time Project Director, Municipal Services and Development Project under the LG&RDD in his own pay scale on deputation basis initially for a period of three years with immediate effect in the public interest.

2. The terms and conditions of deputation of above officer will be settled in due course of time.

SECRETARY TO GOVT.OF KHYBER  
PAKHTUNKHWA, LG&RDD

Endst. Even No. and Date.

Copy is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Planning and Development Department, Peshawar with reference to his letter No.SO(E)P&D/6-6/Contract/LG/2012, dated 19-06-2012.
2. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department.
4. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. The Secretary, Local Council Board, Khyber Pakhtunkhwa, Peshawar.
6. The Project Director, MSDP, LG&RDD, University Town, Peshawar.
7. The Director, Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.
8. The Officer concerned.
9. The Tehsil Municipal Officer, TMA, Town-II, Peshawar.
10. The PS to Senior Minister for LG&RD, Khyber Pakhtunkhwa, Peshawar.
11. The PS to Additional Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
12. The PS to Secretary, LGE&RDD.
13. Office order file.

attested

*[Signature]*

*[Signature]*

*[Signature]*  
(SHAHID KHAN)  
SECTION OFFICER (ESTAB)



Annex E

E

19



Government of Khyber Pakhtunkhwa  
Local Government, Elections and Rural Development Department

**ORDER**

Dated Peshawar, 29<sup>th</sup> October, 2014

No.SO(LG-I)2-334/MSDP/2011.- The Provincial Government in the Local Government, Elections and Rural Development Department is pleased to repatriate Mr.Riaz Ahmad (An officer of RDD), Project Director, Municipal Services and Delivery Project to his parent Department i.e. LG,E&DD with immediate effect in public interest.

2. Consequent upon above, Mr.Muhammad Nacem, Chief Executive, Water Sanitation and Services Project (WSSP) will hold additional charge of the post of Project Director, Municipal Services and Delivery Project (MSDP) in addition to his own duties with immediate effect and until further orders.

SECRETARY TO GOVT.OF KHYBER  
PAKHTUNKHWA, LG,E&RDD

Endst No.SO(LG-I)2-334/MSDP/2011 Dated Pesh: the, 29<sup>th</sup> October, 2014

Copy is forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
3. The Director General, LG,E&RDD, Khyber Pakhtunkhwa, Peshawar.
4. Mr.Riaz Ahmad, Project Director, MSDP, University Town, Peshawar.
5. Mr.Muhammad Nacem, Chief Executive, Water Sanitation and Services Project (WSSP), Peshawar
6. The PS to Minister for LG&RD, Khyber Pakhtunkhwa, Peshawar.
7. The PS to Secretary, LG,E&RDD.
8. Office order file.

Attested  
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(IZAZ ULLAH)  
SECTION OFFICER (ESTAB)

Attested  
ATTESTED

Annex<sup>2</sup>

F

20

ARRIVAL REPORT

In pursuance of Government of Khyber Pakhtunkhwa Local Government, Elections and Rural Development Department Notification No.SO(LG-1)2-334/MSDP/2011 dated 29<sup>th</sup> October, 2014, I Mr. Riaz Ahmad (BPS-18 LG, E&RDD), submit my arrival today i.e. 31<sup>st</sup> October, 2014 afternoon.

Riaz Ahmad  
BPS-18 LG, E&RDD

Copy to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
3. The Director General, LG, E&RDD, Khyber Pakhtunkhwa, Peshawar.
4. Mr. Muhammad Naeem, Chief Executive, Water Sanitation and Services Project (WASSP), Peshawar.
5. P.S to Additional Chief Secretary, Kyber Pakhtunkhwa, Peshawar.
6. S.O Establishment, LG, E&RDD, Khyber Pakhtunkhwa, Peshawar.
7. P.S to Minister for LG, E&RDD, Khyber Pakhtunkhwa, Peshawar.
8. P.S to Secretary, LG, E&RDD, Khyber Pakhtunkhwa, Peshawar.
- ✓ 9. Officer order file.

attested  
[Signature]

[Signature]  
Riaz Ahmad  
BPS-18 LG, E&RDD

[Signature]  
ATTESTED

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21

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Local Government, Elections and Rural  
Development Department, Peshawar

Subject:- APPLICATION FOR THE GRANT OF TWO YEARS (730 DAYS)  
LEAVE WITHOUT PAY.

Dear Sir,

Respectfully it is submitted that due to my personal engagement and unavoidable circumstances, I am in need of two years leave without pay from the date of availing. I had not yet availed any kind of leave during my 22 years service.

It is requested to your kind honour that necessary sanction to the grant of two years (730 days) leave without pay as is admissible under the Civil Servants Revised Leave Rules, 1989 may kindly be accorded so as to enable me to solve my personal as well as long outstanding domestic problems.

Thanks.

Yours faithfully,

  
(Riaz Ahmad)

Assistant Director, LG&RDD

attested



  
ATTESTED

**MEMORANDUM**

FORM OF LEAVE ACCOUNT UNDER THE REVISED LEAVE RULES, 1978/1980

(Approved vide Finance Division's Letter No. F. (13)-Rev. 1/73, dated 16-1-1979)

NAME: RIAZ AHMAD (SSS-18 Acc-210-4000) Assistant Director

POST: Local Govt.

(P.No: 428327)

DATE OF REPORT: 21st September 1993

(N.B. Instructions for filling in the form are printed on the reverse)

To	Y.M.D.	Full Calendar months	Days	Leave at credit (Column 21+0)	LEAVE TAKEN										Remarks	ATTENTION									
					Leave on full pay without medical certificate subject to a maximum of 120 days in case of L.P.R.	Leave on full pay on medical certificate subject to a maximum of 180 days in entire service	LEAVE ON HALF PAY		LEAVE NOT DUE		ABSENCE		Balance on 1-7-1978/1979 from leave (Cols. 7-20)												
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24		
31/12/83	-	4/12/83	04	16																					
31/12/85	-	2-22-85	24	96																					
31/12/86	-	2-29-86	24	96																					
31/12/87	-	3-31-87	36	144																					
31/12/88	-	3-30-88	36	144																					
31/12/89	-	3-31-89	36	144																					
31/12/90	-	4-30-90	48	192																					
30/12/90	-	2-30-90	35	140																					
				<u>972</u>																					

*Completed but the given concerned for 92 days is left upto 30/12/94 out his account*

*Asstt Accounts Officer  
Govt. of Punjab*

*TRD of column 21 of order no. 972/20/93*

*all checked*

(22)



Amie's

23

Dr. Hassan Yaqub

MBBS (KMU), FCPS (PAK)  
FRCS (GLASGOW-UK)

Consultant Ophthalmologist

Sector A-3, Phase-V, Hayatabad, Peshawar.  
Ph: 091-5822612-21, Fax: 091-5822620  
E-mail: dr.hassan@nwhg.pk

Date: 4.10.13

Name: Mirkhator Ahmad Age 70 Sex M

Clinical Record

DM - 7/8 years.

Not well controlled with oral hypoglycemics. Now advised SIC. Insulin - Zimbal by endocrinologist (Dr. Ashad)

Has D/U - few years.

NO record available. Seen by few ophthalmologists before.

(R) mature cataract.

(D) Pseudophakia - Has tiny cba Corneal incision.

Otherwise unremarkable Anterior segments

MTM

✓ Bilateral end stage dry AMD.

No Drabbe retinopathy seen in either eye.

Has used low vision aids before. Not happy with it.

La  
ATTESTER

Pto

A project of ALLIANCE HEALTHCARE (Pvt) Ltd.

ماہ بعد معائنے کیلئے تشریف لائیں۔

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Syrup, 100%

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Alcohol

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+ System ad

- not available

+ provided program for @ Calicut Agency

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+ To review how much and share of

+ provided program approved

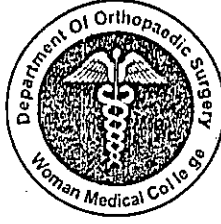
22

(24)

Prof. Dr. Nazir Ahmed

M.B.B.S, F.R.C.S(Ed)

Professor & Head of Orthopaedic Surgery  
Woman Medical College Abbottabad  
CLINIC: Akram Plaza Near to Awan Plaza  
Mandian Abbottabad



Timing: 10:00 AM to 1:00 PM Morning  
4:00 PM to 7:00 PM Evening  
(Sunday Holiday)

Clinic Ph: 0992-384512

Pt's Name: \_\_\_\_\_

Muhammad Amir

(25)

پروفیسر ڈاکٹر نذیر احمد

ایم بی ایس، ایف۔ آر سی۔ ایس (ایڈیٹر)

پروفیسر اینڈ سربراہ شعبہ ہڈی، ہاتھ، و جوت

دوسن میڈیکل کالج ایبٹ آباد

کلینک: اکرام پلازہ نزد امان پلازہ منڈیاں ایبٹ آباد

اوقات کار: صبح 10:00 بجے 1:00 بجے

شام 4:00 بجے 7:00 بجے (جمعہ روز اتوار)

کلینک: 0992-384512

Date: 9/2/2015

RX

① Provenl sup 1000  
دو بار دن 1 + 1

② Geofox plus hb  
دو بار دن

③ Dura gen fort  
دو بار دن

④ Novelat gel  
دو بار دن

⑤ Knee support  
دو بار دن

0120

attested

*[Signature]*

① GA (RT)  
knee

② Pain tips of  
(RT) Shoulder

Diabetic  
Hypertensive

*[Signature]*  
ATTESTED



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-8463080, 8463150

Fax : 051-4863182

26

Dr. Sajjad Hassan Orakzai

MBBS, FRCSI (IRE), FRCS (Tr & Orth)

Fellow Royal College for Surgeons

Intercollegiate Specialty Board

Consultant Orthopedic Surgeon

Head of Department Knee & Hip Replacement

Paediatric Orthopedics Ilizarov External Fixators

Mukhtar

47-62-34

20-11-14

R

Tab. Celbes 100mg (1-0-1)

ایک بار (ب)

Tab. Neutize 2mg (0-0-1)

ایک بار (ب)

Cap. Omnat plus 20mg (1-0-0)

ایک بار (ب)

Tab. Diagesic-P (2-2-2)

دو گریبان (ب) دو بار (ب) - دو بار (ب)

Fastum gel LA (1-1-1)

ایک دو بار (ب)

Adv

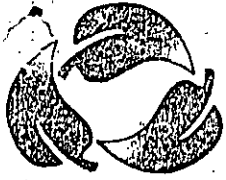
- MRI @ knee
- Vit. D level
- Quad, Hamstrings, VMO

Attested

Signature of Dr. Sajjad Hassan Orakzai

ATTESTED





# Quaid-e-Azam International Hospital Islamabad

27

(A Project of Global Health Services)

M.R No. 51447

Date: 11/1/14

Patients Name: Muhammad Ahmad

Age: \_\_\_\_\_

**Rx**

1. Rheumoids 100mg 1 + 1.

*write*

2. Astrodar

1 + 1.

x 4 wks

*[Signature]*

attested  
*[Signature]*

*[Signature]*  
ATTESTED

Physician's Name	Physician's Signature	Substitution Permissible <input type="checkbox"/>
		Substitution Not Permissible <input type="checkbox"/>

# Vision Care Clinic

28

OPTOMETRIST

We Care For You And Your Eyes

**Mufarrig Shah Umarzai**

ایڈیٹر انچارج  
مفرق شاہ عمرزئی

D.Optom, M.Sc, MISLRR, FIACLE, PGDACO (Australia), FFAO (USA)  
Fellowship International association of Contact Lens Educator

ڈی۔ اوپٹوم، ایم ایس سی، ایم ایس ایل آر آر ایف آئی اے سی ایل ای  
پی جی ڈی اے سی او (آسٹریلیا)، ایف اے اے او (امریکہ)

Refraction, Contact Lenses, Orthoptics  
& Low Vision Specialist

نیوشپ انٹرنیشنل ایسوسی ایشن آف کنٹیکٹ لینز ایجوکیٹر  
نظریہ کا ماسٹر - کنٹیکٹ لینز - بھینکھن اور لوو ویژن اسپیشلسٹ

Department Of Ophthalmology,  
Hayat Abad Medical Complex, Peshawar.

شعبہ امراض چشم، حیات آباد میڈیکل کمپلیکس پشاور

Name..... Prof. M. K. Shah ..... Age..... Sex..... Add..... Date 17/3/11

VA → 32 Met 3 -  
25 Met 3 -

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magnifier

I Rk = -1.00 CY 45° = 6/19  
Ck = -1.5 -0.75 x 120° = 6/31

6 X Telescope

II Rk = Prost -  
Ck = +16.0 D } Per red

III 6 X ocuteca Telescope

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*[Signature]*

Clinic: All Medical Center Opposite  
Lady Reading Hospital OPD Gate  
Hospital Road Peshawar City.

attestical  
*[Signature]*

کلینک: علی میڈیکل سنٹر، مقابل لڈی ریڈنگ ہسپتال  
ہسپتال روڈ پشاور  
فون: 0333-9298262، 9217140-46

Dr. Nafis Ur Rahman

28

M.B.B.S, D.O, F.R.C.S., F.R.C. Ophth  
Consultant Eye Surgeon

Vision Care Centre:

5-C, I-9 Markaz, Islamabad.  
Ph: 051-4431333, 4431444  
Email: r\_nafis@yahoo.co.uk

The Vision Centre:

First Floor, Khayal Plaza,  
Near Ali Medical Centre  
F-8 Markaz, Islamabad.  
Ph: 2254025 - 051-2500379

Prof. Muztar Ahmed

24.11.05

c/o gradual ↓ in central vision - yrs

6/36.  
3/60.

Diabetic

Bilateral cataracts  
RT > LT



Bilateral central chorioidal lesion.

→ central anterior chorioidal dystrophy.

Attested  
[Signature]

[Signature]  
ATTESTED

30

ڈاکٹر شمس الرحمن

ایم بی بی ایس (پشاور) ایف سی پی ایس (پاک) ایف اے سی پی (امریکہ)  
میڈیکل سپیشلسٹ و سینئر رجسٹرار میڈیکل اے وارڈ  
مردان میڈیکل کیمپس مردان

Dr. Shams ur Rahman

MBBS, ECPS (PAK), FACP (USA)

Consultant Physician & Senior Registrar

Medical A Unit  
MMC - Mardan  
E-mail: drshamskhan@yahoo.com

0938-221237: شمال میڈیکل سنٹر سوابی فون: 0301-8342054

بروز اتوار اور جمعہ ایف سی پی ایس (پاک) ایف اے سی پی (امریکہ)

نمبر کیلئے: 0332-9433411

Name Mulehtra Khan Age \_\_\_\_\_ Sex M Date 10/12/11

HTN on Eziday so

Diabetic neuropathy

Bp: 135/80

1. Tab. Duron 30

صبح	دوپہر	رات	کمانے سے 30 منٹ پہلے
			کمانے کے فوراً بعد

2. Tab. Ascaval 150

صبح	دوپہر	رات	کمانے سے 30 منٹ پہلے
			کمانے کے فوراً بعد

3. \_\_\_\_\_

صبح	دوپہر	رات	کمانے سے 30 منٹ پہلے
			کمانے کے فوراً بعد

4. \_\_\_\_\_

صبح	دوپہر	رات	کمانے سے 30 منٹ پہلے
			کمانے کے فوراً بعد

5. \_\_\_\_\_

صبح	دوپہر	رات	کمانے سے 30 منٹ پہلے
			کمانے کے فوراً بعد

6. \_\_\_\_\_

صبح	دوپہر	رات	کمانے سے 30 منٹ پہلے
			کمانے کے فوراً بعد

7. \_\_\_\_\_

صبح	دوپہر	رات	کمانے سے 30 منٹ پہلے
			کمانے کے فوراً بعد

attested  
[Signature]

ATTEST



31

# Dr. Mohammad Javed

FRCP (In.) FRCP (London)  
Professor of Medicine & Consultant Physician  
AYUB MEDICAL COLLEGE & TEACHING HOSPITAL  
Abbottabad

Patient's Name: محمد ادریس Date: 11

Age: 67 Address: سوالی

Weight: 93kg

P	15	
---	----	--

 H.P: 130/80

Diabetes Mellitus  
Peripheral neuropathy

- Noronosem  
- Proger plus

Lopinavir  
-  
-  
-

Neurogenin 300

1 + 1

- Glucose  
- Creatinine

- Nuzib 200

- 1 + 1

- Pentib-an 60

کلینک بروز ہفتہ اور اتوار کو بند رہے گا۔

Note: Clinic closed on Saturdays & Sundays

*[Signature]*  
ATTESTED

شفیق میڈیکل سنٹر  
انسٹروڈ، ایبٹ آباد۔

Attested  
*[Signature]*



32

# Dr. Mohammad Javed

FRCP (Ire.) FRCP (London)  
Professor of Medicine & Consultant Physician  
AYUB MEDICAL COLLEGE & TEACHING HOSPITAL  
Abbottabad

Patient's Name: Muhammad Ahmad Date: 15/11/85

Age: \_\_\_\_\_ Address: \_\_\_\_\_

Weight: \_\_\_\_\_  15  B.P: 136/85

Neurogeni  
Egiday Prognosis

Neurogeni <sup>300</sup>  
C17 - 1 + 1

Neurogeni  
C17 - 1 + 1 + 1

attested

*[Signature]*

*[Signature]*

ATTESTED

کلینک بروز ہفتہ اور اتوار کو بند رہے گا۔

Note: Clinic closed on Saturdays & Sundays

شفیق میڈیکل سنٹر

ٹائٹھ روڈ، ایبٹ آباد۔

33

Surgeon

Abdul Aziz Khan

ڈاکٹر عبدالعزیز خان

For Registrar  
B.B.S (Gold Medalist) RMP MCPS  
CPS (Neuro Surg)  
Ayub Medical Complex Abbot Abad



ایم بی بی ایس (گولڈ میڈلسٹ) ایم سی پی ایس (نیوروسرجری)

ایبٹ آباد، ایوب میڈیکل کمپلیکس، ایبٹ آباد  
ایبٹ آباد، ایوب میڈیکل کمپلیکس، ایبٹ آباد

Name: Mahlag Ahmad Age: 67y Sex: m Date: 20/16/11

Handwritten notes in Urdu:  
سر ایبٹ آباد  
جمنی  
کونکریٹ  
ڈی  
سر

Handwritten notes in Urdu:  
فرضاً  
1-1  
فرضاً  
1-1-1

Handwritten signature

Handwritten signature: *Attested*

اوکی میڈیکل سٹور ڈاکٹر بلازہ العالی ابٹ میڈیکل کمپلیکس

مین گیٹ ایبٹ آباد، سوہیل 0345-9460061

اوقات کار: سہ پہر 2 سے شام 7 بجے تک

افتخار میڈیکل یوز اڈینہ سوہیل: 0344-5367227

اڈار کے دن آنے سے پہلے رابطہ کریں

معاذہ بردہ

Not Valid for Court

ATTESTED





(35)

**Professor Dr. Khaleeq uz Zaman**

BA (Iqbalia) MBBS (Pesh), LRCP (Lond), MRCS (Eng), DCPS (HPE)  
FRCS (Glas), FRCS (Ed), FRCS Neurosurgery (Ed), FCPS (Neurosurgery)  
Consultant Neurosurgeon

Head, Deptt of Neurosurgery

Quaid-e-Azam Postgraduate Medical College  
Pakistan Institute of Medical Sciences, Islamabad  
Phone: 9260196, 9261265, Ex: 2266, 2445

Ali Medical Centre

F-8 Markaz, Islamabad  
Ph: 2255313-15, 2855174-6  
Res: 9261166, Fax: 2256237

*Handwritten signature*

Exy  
SDI  
SDI  
SDI  
24.4.2011  
Ref

Diabetes  
C. I. Q. M.

claudication

no improvement

Rf

- ① *Handwritten*
- ② Neuronal  
1+1+1
- ③ Dragesic  
1+1+1

MRI  
stenosis  
↓

*Handwritten signature*

attested  
*Handwritten signature*

Addressed on 26/04/11

11.8.000/11/04/11  
AY. 1. 05. 10. 11  
*Handwritten notes and signatures*

# Dr. Inayat Ullah Khan

(36)



MBBS, FRCS (Ireland)  
FRCS (Neurosurgery) (UK)  
Intercollegiate Speciality Board in Neurosurgery, (UK)  
Specialist in Brain and spine  
Associate Prof in Neurosurgery  
Shifa College of Medicine, Islamabad.

Mukhtaar Ahmed  
Neurogenic  
Claudication  
March

Date: 30/10/10

0300-5283139



L4/5 Canal  
stenosis

Ad/

Cap C9 In ex 300 cm  
2C 1+1+1

Ad/ Surgery

Las Methycobal  
2C 1+1+1



Attested

Signature

Signature

ATTESTED

Signature



ذیشان میڈیکل سنٹر بالمقابل عید گاہ شمسی روڈ مردان۔ فون: 0937-864879



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-4603666, 4603231

Fax : 051-4863182

Muhammad Ahmed

(37)

Prof. Dr. Inayat Ullah Khan

MBBS, FRCS (Ireland)

FRCS (Neurosurgery) UK

Intercollegiate Specialty Board in Neurosurgery, UK

Specialist in Brain and Spine

Head of Neurosurgery

Shifa College of Medicine

Ad

پیش (3)

Cap Calorex 300 mg  
2 1 + 1 + 1

T/S Zyloric 300 mg  
ibid 1

Cap Phlogin 50 mg  
2 1 + 1

T/S Aboral  
ibid 1

Inayat

29/7/11

Attested  
[Signature]

[Signature]  
ATTESTED

Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistan  
Tel: 051-4603666 Fax: 051-4863182

38

M.R.No. 44-62-34 Date 28/4/11

Patient's Name Muhammad Ahmed Age 67 yrs

Address \_\_\_\_\_

RX

Cap Glucex 300mg  
1 + 1 + 1

Tab Forystk  
1 + 0 + 0

Tab Prozan Plus 15mg  
500  
1 + 0 + 0

Tab Nuronorm 0.5mg  
علاج 3-4  
1 (میں 3-4)

Tab Eziday 25mg  
1 + 0 + 0

Cap Riserx 40mg  
1 + 0 + 0

Muhammad  
6853  
MO (Signature)

Physician's Signature

Substitution Permissible

Substitution Not Permissible

Come to Shifa Pharmacy for Quality Medicine

معیاری دواؤں کے حصول کے لئے شیفہ فارمیسی سے رجوع کریں۔

Attested

Shifa  
ATTESTED



شفا انٹرنیشنل ہسپتال اسلام آباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel : 051-4603666, 4603231

Fax : 051-4863182

(39)

Dr. Inayat Ullah Khan

MBBS, FRCS (Ireland)

FRCS (Neurosurgery) UK

Intercollegiate Specialty Board in Neurosurgery, UK

Specialist in Brain and Spine

Professor Neurosurgery

Shifa College of Medicine

Mukhtar Ahmed

Tas Prozar Plus 15/sw  
? ①

~~Tas~~ Eziday 25 wt  
? ①

Tas Brysk

? ①  
Tas Navonorm 0.5 wt  
(w 1/2 ? ①) ✓

Tas Sumbex - 2  
ib ①

Is Chemical - D

ib ①  
Cap Risk 40 wt

? ①  
Loyal 5/5/11

attested ATTESTED

ib

(2) weeks

Dr. Ossam Khan

Diplomate, American Board of Internal Medicine  
Consultant Physician



REHMAN MEDICAL INSTITUTE (PRIVATE) LIMITED.

5/B-2 Phase - 5 Hayatabad Peshawar Pakistan.  
Phone : (92-91) 5825501-07 ; Fax (92-91) 5810055  
UAN: 111-REH-MAN (734-626)  
E-mail : ossam.khan@rmi.com.pk ; Website: www.rmi.com.pk

(40)

Clinic Timing: 9:00 a.m - 1:00 p.m. Tuesday - Thursday - Saturday (Morning)  
Clinic Timing: 2:00 p.m - 5:00 p.m. Monday - Saturday (Evening)

Ref: \_\_\_\_\_

Date: 29/11/10  
from Pesh.

Mukhtar Ahmad  
67M

FU visit (last seen 9/10)  
for polyarthralgias - Current c/o D elbow pain.

Meds  
Rozar Plus 15/500  
Vovonorm 0.5<sup>2</sup>

Hx of HTN, DM-2 (on oral agents)  
Sugars well controlled at home (usual range fasting/2as)

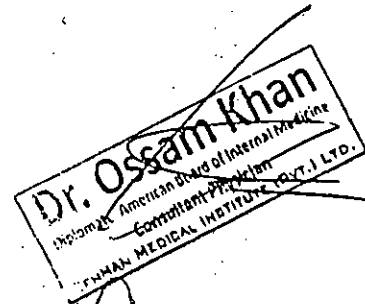
O/E  $\phi$  joint Inflammation / Effusion  
Normal Rom D Elbow.

BP = 138/102  
HR 107

XR knees.  
Uric Acid  
A/C

پیشانی، بازو، رگڑوں

(Rx) - Cytopan 50mg 1+0+1  
(پانچ گھنٹے پر) - پانچ گھنٹے پر  
- Nexum 40mg 1+0+0  
پانچ گھنٹے پر



attested  
*[Signature]*

Dr. Ossam Khan

Diplomate, American Board of Internal Medicine  
Consultant Physician



REHMAN MEDICAL INSTITUTE (PRIVATE) LIMITED

5/B-2 Phase - 5 Hayatabad Peshawar Pakistan.  
Phone: (92-91) 5826501-07; Fax (92-91) 5810055  
UAN: 111-REH-MAN (734-626)  
E-mail: ossam.khan@rmi.com.pk; Website: www.rmi.com.pk

Clinic Timing: 9:00 a.m. - 1:00 p.m. Monday - Thursday - Saturday (Morning)  
Clinic Timing: 2:00 p.m. - 6:00 p.m. Monday - Saturday (Evening)

Ref: \_\_\_\_\_

Mukhtar Ahmad  
67M

Date: 2/9/10  
from Pesh

C  
M  
MM  
Em  
033:  
Nam  
C  
M

HIV  
RM-2

Movonorm 0.5  
Finger PWS

90 polyarthralgias

Most severe is D knee.

DJD spine.

D joint Inflammation.

D Elbow joint mild effusion

✓ KR knees  
✓ Uric Acid  
CBC  
S. Electrolytes.  
A/c

Rx - Celebrex 200mg 1+0+1  
البروفين / سيبريفين  
1 / 0 / 1  
البروفين  
Theagran - m 1+0+0  
S. G

Rtc 2 wks

Attested  
Signature

Dr. Ossam Khan  
Diplomate, American Board of Internal Medicine  
Consultant Physician  
REHMAN MEDICAL INSTITUTE (PVT.) LTD.

Signature

Dr. Shams ur Rehman

MBBS (PESH), FCPS (PAK), FACP (USA)

Consultant Physician & Senior Registrar

Medical A Unit

MMC - Teaching Hospital Mardan

Email: drshamskhan@yahoo.com

فون نمبر: 0332-9433411



ڈاکٹر شمس الرحمن

ایم بی بی ایس (پشاور) ایف سی پی ایس (پاک) ایف اے سی پی (امریکہ)

میڈیکل سپیشلسٹ و سینئر رجسٹرار میڈیکل اے وارڈ

مردان میڈیکل کیمپس، بچنگ ہسپتال مردان

جمال میڈیکل سنٹر صوابی

موبائل: 0301-8342054 روز اتوار الرحمن میڈیکل سنٹر، ٹوبی

Name Mukhtiar Khan Age \_\_\_\_\_ Sex ♂ Date 13/9/11

Clinical Record

Rx

DM on orals

HTN on Ezid

Dank urine

↓ BUN 24

BP: 140/90

Tab: Stros tabs 600

Tab: Zentel

Attested

[Signature]

[Signature]

3x - 172

CP T: 50 mg/L



# IQBAL EYE CLINIC

43

**PROF: MUSTAFA IQBAL**

MBBS, MCophth, FRCS (UK)  
Diabetic & Laser Specialist,  
Vitroretinal & Phako Surgeon

پروفیسر مصطفیٰ اقبال

انچارج آئی بی وارڈ  
خیبر پونجک ہسپتال پشاور

**PROF: ZAFAR IQBAL**

MBBS, MCPS, FRCS (UK)  
Paediatric Ophthalmologist, Strabismologist,  
Phako & Laser Refractive Surgeon.

پروفیسر ظفر اقبال

انچارج آئی وارڈ  
گورنمنٹ لیڈی ریڈنگ ہسپتال پشاور

Date: 7-02-011 Prof. Mukhtar Age 67y. 14 Peshawar.

MODEL: MA60AC  
POWER: 20.0 D  
LENGTH (Ø<sub>T</sub>): 13.0mm  
OPTIC (Ø<sub>O</sub>): 6.0mm  
SN: 11055434 063 Alcon Laboratories, Inc.

EXP DATE 2015-07

UV

ACR 50° IOL



Left Phaco IOL. — SA.  
uneventful

RT Keracool + Luacef  
ASD.

Tab Voltarol 50mg tds  
Tab AZM 250mg

Review Eye OPD KTH at 8:30  
am

Please attested

☎ 2212226 1-A ڈگری گارڈن پشاور

تعطیل بروز ہفتہ اور انوار

Handwritten signature and the word "ATTESTED" stamped below it.

(44)

Remove dressing

Wound

Auftrag

Check for puffiness

(Eudrachellal) (or ?)

Ustata



look out

Be. health

Allesat

DNR 10/24/12

6/80 PM 6/12

all over ?



46

Brig Dr.

Syed Karamat Hussain Shah Bukhari

SITARA-E-IMTIAZ (MILITARY)

MBBS FCPS (Medicine)

Formely Asstt: Professor of Medicine

CMH Lahore Medical College

Classified Medical Specialist

Head Of Medical Department

Gastroenterologist

Cell #: 0321-4336352

بریگیڈیئر ڈاکٹر سید کرامت حسین بخاری

ستارہ امتیاز (میلٹری)

ایم بی بی ایس، ایف سی پی ایس (میڈیسن)

سابقہ اسٹنٹ پروفیسر آف میڈیسن

سی ایم ایچ لاہور میڈیکل کالج پیشکش

ہیڈ آف میڈیکل ڈیپارٹمنٹ

گیٹرو انٹرنال وجسٹ



CMH ABBOTTABAD

ISO9001-2008 Certified

Name: mon khatra Age: \_\_\_\_\_ Date: \_\_\_\_\_

Clinical Record

Rx

*Attest*  
*ta*

ATTESTED

BRIG  
KARAMAT HUSSAIN  
CLASSIFIED MEDICAL SPECIALIST  
CMH ABBOTTABAD

# DOCTOR'S MEDICAL CENTER

47

**Dr. Ashfaq Ali**

Endocrinology Department  
Hayatabad Medical Complex  
Peshawar.  
Scientific Member of  
PAKISTAN ENDOCRINE SOCIETY



ڈاکٹر اشفاق علی

انڈو کرائیالوجی ڈیپارٹمنٹ

حیات آباد میڈیکل کمپلیکس پشاور

سائنٹیفک ممبر آف پاکستان انڈو کرائیالوجی سوسائٹی

کلینک برائے امراض شوگر، خوردہ، بلڈ پریشر، گردہ، کولیسٹرول، موٹاپا

Pt's Name مختار احمد Age 8 Gender M Wt          Date 1/2/13 Add. صوابی

Clinical Record  
Dm 2 - 6/2/13  
Bmi 27.5  
Insulin  
فی الحال نیہ  
2

Rx  
110/70  
C.T. Amgl m SR 1/500  
ع نائے سے  
C.T. Sitagliptin 1+1+0 5/500  
Ascid / Lopu  
روزانہ کا  
Rast  
Gabica 1+1  
ATTESTED

48

**DEPARTMENT OF RADIOLOGY**  
**C.M.H ABBOTTABAD**

**Lt.Col**  
**DR. SYED SHAHID HUSSAIN**  
M.B.B.S Dip.Radio,(AFPGMI)  
MCPS Radiodiagnosis (PAK)FCPS(I)  
Radiologist CMH Abbottabad  
Off # 0992-351-36128

**MAJ**  
**DR. SAJJAD HUSSAIN**  
M.B.B.S Dip.Radio,(AFPGMI)  
FCPS Radiodiagnosis  
Radiologist CMH Abbottabad  
Off # 0992-351-36128

Name..... *M. Uthman Ahmed* ..... Age..... ID NO..... *18241* .....

Part Examined..... *U/S Abd + Pelvis* ..... Date..... *27/7/12* .....

**SONOGRAPHY ABDOMEN**

**Liver :** Normal in size *11.4 cm* Normal homogenous echo texture of liver is seen. No focal lesion detected. Portal vein and hepatic veins have normal Calibers.

**G.Bladder :** Normal in size and shape. No calculus or wall oedema seen. Common bile duct normal caliber.

**Pancreas :** Normal echo texture.

**Spleen :** Normal in size *10.4 cm* and echo texture. No focal lesion seen.

**Rt.kidney :** Normal in size *11.2 cm* and regular contour. No calculus, or hydronephrosis seen. Normal corticomedullary differentiation seen.

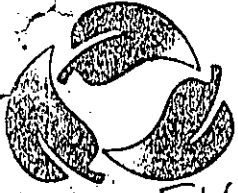
**Lt.kidney :** Normal in size *12.5 cm* and regular contour. No calculus or hydronephrosis seen. Normal corticomedullary differentiation seen.

**U.Bladder:** Urinary bladder is normal. No free fluid seen in pelvis.

**\*Impression:** *Findings are within normal limits.*

*Attestal*  
*Di*

*Sajjad Hussain*  
Radiologist  
ATTES



# Quaid-e-Azam International Hospital Islamabad

(A Project of Global Health Services)

49

M.R No. 51447

Date 21/5/14

Patients Name: \_\_\_\_\_

*Mudabitar Alwal*

Age: \_\_\_\_\_

Rx

1. *Sij. Hyalgan* (1)

*[Signature]*

2. *Acabel 4mg* 1+1  
*2x*

3. *Astrodar* 1+1

*[Signature]*

*[Signature]*  
ATTESTER

*Attested*  
*[Signature]*

Physician's Name	Physician's Signature	Substitution Permissible <input type="checkbox"/> Substitution Not Permissible <input type="checkbox"/>
------------------	-----------------------	--

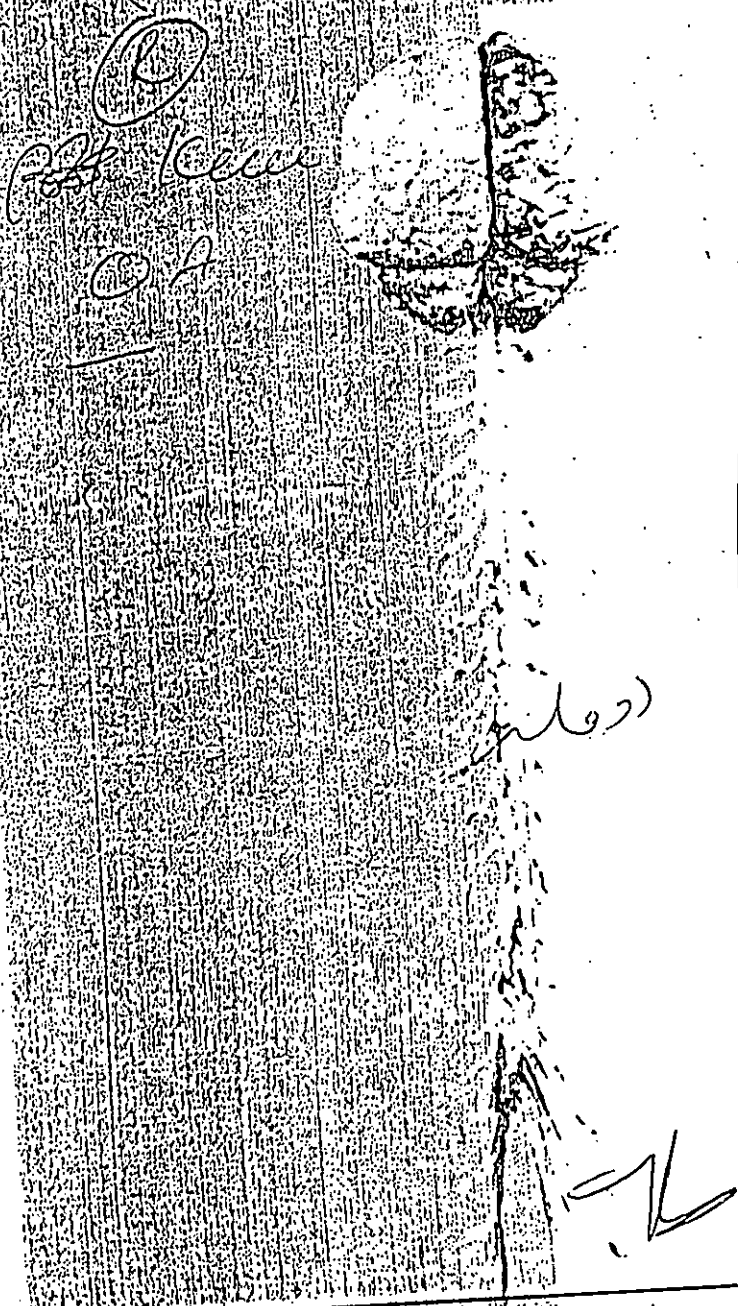
(50)

Assistant Professor Neuro Surgeon  
**Dr. Abdul Aziz Khan**  
M.B.B.S (Gold Medalist) RMP MCPS  
FCPS (Neuro Surg)  
Ayub Medical Complex Abbot Abad



اسٹنٹ پروفیسر نیوروسرجن  
**ڈاکٹر عبدالعزیز خان**  
ایم۔ بی۔ بی۔ ایس۔ گولڈ میڈلسٹ  
آر۔ ایم۔ بی۔ ایم۔ سی۔ بی۔ ایس۔ ایف۔ سی۔ بی۔ ایس۔ (نیوروسرجری)  
ماہر امراض: فانیح احرام منفر، مرگی، جوش، دماغ، مکرر درد، عرق النساء  
ایوب میڈیکل کمپلیکس ایبٹ آباد

Name: Dr. Abdul Aziz Khan Age: 59 yr Sex: M Date: 5/8/11



- Cap Lateral 1-1
- Cap Dice - 4
- 1-1
- Pal. Lorcama A
- 1-1
- Cap Pericap 4
- 1-1

Attested *[Signature]* Attested *[Signature]*  
ATTESTED

روف میڈیکل سنٹر آن نیورال جیٹ نمبر 3  
ماسٹرہ روڈ ایبٹ آباد سوات  
0300-5820422  
اوقات کار: سہ پہر 2 سے شام 7 بجے تک

Not Valid for Court

انٹار میڈیکل یونیورسٹی ایبٹ آباد ضلع صوابی  
ہفتہ، اتوار کے دن آنے سے پہلے رابطہ کریں۔  
نمبر لینے کیلئے فون نمبر: 0302-4108586





Patient's Copy

51

Shifa International Hospital Ltd.

شفا انٹرنیشنل ہسپتال اسلام آباد پاکستان

H-8/4, Islamabad - Pakistan Ph: 051-846.3666 Fax: 051-486.3182

Transfer To Dr \_\_\_\_\_  
 Donate To Shifa Foundat:

DR's Fee Level  
0 1 2 3

Dr's Signature

**\*\* Patient Account Statement \*\***

MR Number: 44-62-34  
Patient: Mr. Mukhtar Ahmed  
S/O Abdul Raheem  
Order By: Dr. Sajjad Hassan Orakzai - 168

Dated: 20/11/14  
Time: 09:17:31

Code	Description	STAT	Date Paid	Service	Remark
DC01-08686	** Consultation ** Sajjad Hassan Orakzai OPD Initial Visit	normal	20/11/2014	1,500	CASH
Rupees One Thousand Five Hundred Only.				Total:	1500

[ORIGINAL]

The test reports can be discussed with consultants within 07 days of initial visit without paying additional consultation fee.

In case of diagnostics, sample must be provided within 72 hours of the issuance of original receipt.  
No refunds will be given after 7 days from the date of this receipt.

Our valued patients are advised to avail diagnostic/pharmacy services from Shifa to ensure that quality is not being compromised.

Cashier: Umar 11993

FORM-0005

Receipt# 00189

میں نے اسے باقی رہ جانے والے تمام کاپیوں کو (مستحقانہ طور پر) وصول کرنے کے لئے جمع کیا ہے۔  
میں نے اسے باقی رہ جانے والے تمام کاپیوں کو (مستحقانہ طور پر) وصول کرنے کے لئے جمع کیا ہے۔  
میں نے اسے باقی رہ جانے والے تمام کاپیوں کو (مستحقانہ طور پر) وصول کرنے کے لئے جمع کیا ہے۔



attested  
[Signature]



# Quaid-e-Azam International Hospital Islamabad

52

M.R No. 51447

(A Project of Global Health Services)

Date: 11-03-14

Patients Name: MR. Mukhtyar Ahmed

Age: \_\_\_\_\_

**Rx**

1. Rheocomb 100mg

r+h.  
w/c

2. Astrolan

r+h.  
x 2 months

Attested  
[Signature]

**ATTESTED**

Physician's Name	Physician's Signature	Substitution Permissible <input type="checkbox"/> Substitution Not Permissible <input type="checkbox"/>
------------------	-----------------------	--

53

# DISCHARGE SUMMARY

Patient Identification  
 Mukhtar Ahmed  
 44-62-34  
 67 yrs 3M - Male

Attending Physician:  
 Dr Inayatullah Khan

Clinical Service:  
 Neuro Surgery.

Date of Admission: 25-04-2011

Date of Discharge: 28/04/2011

Final Diagnosis: L4/L5 canal stenosis.

Secondary Diagnosis (es):

Procedures / Operations: Laminectomy L4 & decompressing L4/L5.

Consultations: Medical Consultation.

Brief History & Hospital Course: Patient 67 yrs old male, was diagnosed the case of L4/L5 canal stenosis and was treated accordingly.

Discharge Medication:  
 Cap Glaxox 300mg x 1 (D&T)  
 Tab Brysk 1xOD  
 Tab Pibzer Plus 15/500mg 1xOD, Tab NANO 0.5mg 1tab AM  
 Tab Eziday 25mg 1xOD, Cap Riserx 40mg 1xOD } 7 days

Activity & Dietary Instructions:

Follow-up Instructions: F/U after one week

Nurse: \_\_\_\_\_ Signature  
 Doctor: *Mukhtar Ahmed* Signature

I have read and understand the given instructions.  
 Patient/Responsible Person's (Name *Fayaz Ahmad*) Signature:

White - Patient, Green - Business Office, Yellow - Medical Record



Amex

H

54

Government of Khyber Pakhtunkhwa  
Local Government, Elections and Rural Development Department

NOTIFICATION

Dated Peshawar, the 9<sup>th</sup> December, 2014

No.SO(LG-1)10-433/93.- The Provincial Government in the Local Government, Elections and Rural Development Department is pleased to post Mr.Riaz Ahmad, Assistant Director (Awaiting posting) against the vacant post of Assistant Director, Local Government and Rural Development Department, Chitral relieving Mr.Abdul Akram, AAC Chitral of the additional duties with immediate effect in public interest.

SECRETARY TO GOVT.OF KHYBER  
PAKHTUNKHWA, LG,E&RDD

Endst No.SO(LG-1)10-433/93

Dated Peshawar, the 9<sup>th</sup> December, 2014

Copy is forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General, LG&RDD, Khyber-Pakhtunkhwa, Peshawar.
3. The Deputy Commissioner, Chitral.
4. The Officer concerned.
5. All Assistant Directors, LG&RDD in Khyber Pakhtunkhwa.
6. The District Accounts Officer, Chitral.
7. The PS to Senior Minister for LG,E&RD, Khyber Pakhtunkhwa.
8. The PS to Secretary, LG,E&RDD.
9. The PS to Special Secretary, LG,E&RDD.
10. The office order file.

(IZAZ ULLAH)  
SECTION OFFICER (ESTAB)

attest  
P.

ATTESTED

35

Amme 2 I

*[Handwritten signature]*  
2/11/14

To,

Section Officer (ESTAB)

Government of Khyber Pakhtunkhwa

Subject: Appeal for approval of leave

Reference your letter No.SO(LG-1)10-433/93 Dated 9 December 2014. It is my honor to request that my attached subject application may kindly be forwarded to the honorable Chief Secretary Government of Khyber Pakhtunkhwa.

Yours truly

Riaz Ahmad

*[Handwritten signature]*  
18/12/14

Assistant Director (BPS18)

Local Government And Rural Development

Government of Khyber Pakhtunkhwa

*[Handwritten signature]*  
ATTESTE

Copy =DG LG and RDD

*[Handwritten signature]*  
24/12/2014  
4:10 PM

Attested  
*[Handwritten signature]*

56

To,

The Chief Secretary

Government of Khyber Pakhtun Khwa

(Through Proper Channel)

**Subject: Appeal for approval of leave**

It is humbly requested, in your honor, that I have submitted a request to the honorable secretary LG and RDD for leave without pay as is admissible under the Civil Servants Revised Leave Rules, 1989. While the department filed my application and I have been posted to Chitral.

It is my honor to state that I have served 16 years of job in hard area of FATA, including Parachinar, Bajur, Orakzai and Mahmand agencies and I have never availed any long leave in my career. I have more than 900 days leave in my leave account as issued by AG office.

I am 50 years old and heart patient. My father is also seriously ill and is in need of proper attention/ treatment and I have certain serious domestic issues in my family that I have to look over.

Therefore, it is requested that kindly on humanitarian bases direction may kindly be issued to my department for grant of leave and cancellation of transfer.

Yours truly

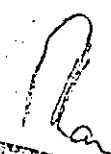
  
Riaz Ahmad

18/12/2014

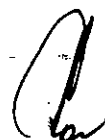
Assistant Director (BPS18)

Local Government And Rural Development

Government of Khyber Pakhtun Khwa

  
ATTESTED

Attested





Amir

J

57

IMMEDIATE

GOVERNMENT OF KHYBER PAKHTUNKHWA  
LOCAL GOVERNMENT, ELECTIONS AND RURAL DEVELOPMENT DEPARTMENT

No.SO(LG-I)10-433/93

Dated Peshawar, the 16<sup>th</sup> February, 2015

To

Mr. Riaz Ahmad,  
Assistant Director,  
LG&RDD, KP, Peshawar

Subject:- ASSUMPTION OF CHARGE AS ASSISTANT DIRECTOR,  
LG&RDD, CHITRAL

Memo:

I am directed to refer to the subject cited above and to say that you were transferred and posted as Assistant Director, LG&RDD, Chitral vide this Department Notification of even number dated 09-12-2015, but despite lapse of more than two months you did not assume charge at Chitral. This act on your part tantamount to misconduct under the relevant law/rules.

I am further directed to ask you to implement order of the Competent Authority and assume charge of the post of Assistant Director, LG&RDD, Chitral within seven days under intimation to this Department positively. In case of failure, you will be proceeded against under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

(IZAZ ULLAH)  
SECTION OFFICER (ESTAB)

Enclst. Even No. & Date.

Copy is forwarded to:-

- 1 The Director General, LG&RDD, Khyber Pakhtunkhwa, Peshawar.
- 2 The PS to Secretary, LG,E&RDD.

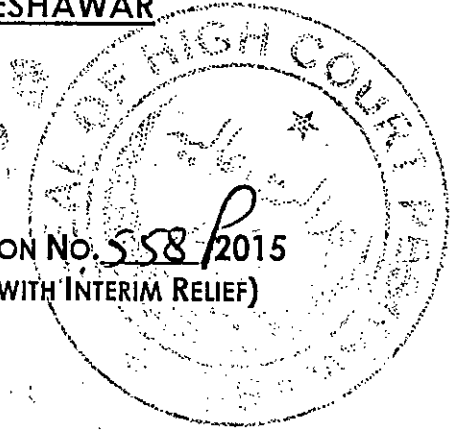
SECTION OFFICER (ESTAB)

Attested  
Riaz

ATTESTED

Amir K (58)

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR



WRIT PETITION No. 558/2015  
(ALONG WITH INTERIM RELIEF)

Riaz Ahmad S/o Mukhtiar Ahmad  
R/o Village Manerai, Tehsil & District Swabi  
Assistant Director (under transfer) BS-18,  
Office of the Secretary (LGE&RDD),  
Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar. . . . . PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary to Govt. of Khyber Pakhtunkhwa, LGE&RDD, Civil Secretariat, Peshawar.
3. Director General, LGE&RDD, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, CM Secretariat, Peshawar.
5. Private Secretary to Minister for LGE&RDD, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
6. Accountant General of Khyber Pakhtunkhwa, Fort Road, Peshawar Cantt. . . . . RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF THE ISLAMIC REPUBLIC OF  
PAKISTAN, 1973.

FILED TODAY  
Deputy Registrar  
23 FEB 2015

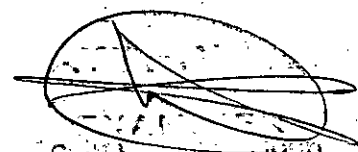
~~ATTESTED~~  
EXAMINER  
Peshawar High Court  
18 MAR 2015



**Respectfully Sheweth:**

1. That petitioner, being law abiding citizen of Pakistan and permanent resident of District Swabi, was appointed Assistant Director (BPS-17), vide notification No.SO(LG-I)2-204/90 dated 01.09.1993, on the recommendations of Khyber Pakhtunkhwa Public Service Commission, however, the competent authority/ up-gradation committee approved 17 posts of Assistant Directors/ Planning Officers (LGE&RDD), including petitioner, were upgraded from BPS-17 to BPS-18 (personal), vide notification No.SOB(LG)1-4/2003/Vol-II dated 25.07.2013 w.e.f 13.09.2011 (retrospectively).  
(COPIES OF NOTIFICATIONS DATED 01.09.1993 AND 25.07.2013 ARE ATTACHED AS ANNEXURE "A" & "B" RESPECTIVELY).
2. That petitioner had remained posted against different positions, including Project Director, Municipal Services Programme, US Aid, TMO Town-II, Peshawar, Project Director (MSDP), etc and always performed duties with zeal and devotion with the entire satisfaction of his superiors more than 22 years spotless career at his credit.  
(COPY OF EMPLOYMENT RECORD IS ATTACHED AS ANNEXURE "C").
3. That the competent authority posted petitioner as full time Project Director (MSDP) under the supervision of LGE&RDD on deputation basis, initially for a period of three years in the public interest, vide office order No.SO(LG-I)2-334/MSDP/2012 dated 28.06.2012.  
(COPY OF OFFICE ORDER DATED 28.06.2012 IS ATTACHED AS ANNEXURE "D").
4. That Secretary LGE&RDD, Govt. of Khyber Pakhtunkhwa, while assuming charge of his responsibilities, repatriated petitioner vide office order No.SO(LG-I)2-334/MSDP/2011 dated 29.10.2014, prior to completion of his tenure i.e. three years, without mentioning reasons whereof.  
(COPY OFFICE ORDER DATED 29.10.2014 IS ATTACHED AS ANNEXURE "E").
5. That petitioner, in pursuance of office order dated 29.10.2014, submitted his arrival report to the office of Secretary LGE&RDD on 31.10.2014 i.e. on the 2<sup>nd</sup> day of repatriation order.  
(COPY OF ARRIVAL REPORT IS ATTACHED AS ANNEXURE "F").

**FILED TODAY**  
Deputy Registrar  
23 FEB 2015



13 MAR 2015

6. That petitioner applied for grant of two years leave without pay under the relevant provisions of Khyber Pakhtunkhwa Civil Servants (Revised) Leave Rules, 1981, due to serious illness of his father, suffering from complicated Lungs diseases since more than two decades; but astonishingly he was declared Cancer patient and the doctors advised him to consult Shaukat Khanam Hospital Lahore for onward treatment, therefore, petitioner has no option, but to proceed with his father, coupled with so many other domestic and personal issues, which needs redressal, even otherwise, petitioner had not availed any kind of leave during his more than 22 years service career.

(COPIES OF APPLICATION ALONGWITH FORM OF LEAVE ACCOUNT DATED 30.11.2014 AND EXTRACT FROM MEDICAL PRESCRIPTIONS ARE ATTACHED AS ANNEXURE "G" & "G/1" RESPECTIVELY).

7. That respondent No.2, instead to consider application for leave supra of petitioner, transferred him against the post of Assistant Director (BPS-17) LRE&RDD Chitral, vide notification No.SO(LG-I)10-433/93 dated 09.12.2014.

(COPY OF NOTIFICATION DATED 09.12.2014 IS ATTACHED AS ANNEXURE "H").

8. That petitioner, in such eventuality, preferred departmental representation/ appeal to the competent authority i.e. Chief Secretary, on 18.12.2014, for grant of two years leave without pay and cancellation of subsequent transfer order dated 09.12.2014, however, to no avail so far.

(COPY OF DEPARTMENTAL APPEAL/ REPRESENTATION DATED 18.12.2014 ALONGWITH COVERING LETTER IS ATTACHED AS ANNEXURE "I").

9. That respondent No.2, vide office letter No.SO(LG-I)10-433/93 dated 16.02.2015, communicated on 19.12.2014, directed petitioner to assume charge of the post of Assistant Director LGE&RDD Chitral within seven (7) days positively and, in case of failure, he will be proceeded against under the Khyber Pakhtunkhwa Govt. Servants (E&D) Rules, 2011 under the charges of misconduct.

(COPY OF OFFICE LETTER DATED 16.02.2015 IS ATTACHED AS ANNEXURE "J").

~~FILED TODAY~~

Deputy Registrar  
23 FEB 2015

~~ATTESTED~~  
EXAMINER  
Peshawar High Court.

18 MAR 2015

10. That petitioner, being aggrieved of non-granting leave without pay, notification dated 09.12.2014, whereby he was transferred against the post specified for BPS-17, not considering/ deciding departmental appeal/ representation dated 18.12.2014 and office letter dated 16.02.2015 of respondent No.2, whereby he was directed for compliance of the impugned notification dated 09.12.2014 within seven (7) days otherwise he will be proceeded against under the Khyber Pakhtunkhwa Govt. Servants (E&D) Rules, 2011 under the charges of misconduct, and having no other efficacious and alternate remedy, approaches this Honourable Court, inter alia, on the following grounds;

**G R O U N D S:**

- A. That the impugned notification dated 09.12.2014, whereby petitioner, being in BPS-18, was transferred to Chitral against the post of Assistant Director BPS-17 and, that too, by not considering his application for leave without pay and subsequent impugned office letter dated 16.02.2015, whereby he was warned to be proceeded against under the Khyber Pakhtunkhwa Govt. Servants (E&D) Rules, 2011 on the charges of misconduct, if he did not submit arrival report within seven (7) days, have been issued in utter disregard to law and rules governing the subject, rather respondent No.2, author of the impugned notification and office letter, has acted without jurisdiction by stepping in the shoes of respondent No.1, being competent to either repatriate or transfer or issue warning to petitioner, hence the impugned notification and all subsequent steps thereto is coram-non-judice and deserves to be set at naught.
- B. That petitioner, due to serious illness of his old aged father, was unable to continue his treatment from Shaukat Khanam Hospital, Lahore, due to his professional engagements, applied for two years leave without pay under the relevant provisions of law and was very much hopeful for granting of the same, but astonishingly his application was neither considered nor result whereof was

LED TO D.S.  
 Public Registrar  
 23 FEB 2015

ATTESTED  
 EXAMINER  
 Peshawar High Court

18 MAR 2015

intimated to him, furthermore, under Rule-12 r/w 23, 29 & 31 of Khyber Pakhtunkhwa Civil Servants (Revised) Leave Rules, 1981, petitioner has legal vested right to be granted leave without pay for a period of 972 days in view of leave account statement issued by AGPR on 01.09.2014 (annexure "G"), while he requested for grant of leave without pay for 730 days, being reasonable as well as his entitlement, however, respondent No.2 did not bother to forward his application to respondent No.1, being competent authority, which speaks volume of malafide on his part. Moreover, under Rule-23 of the Rules *ibid*, the civil servant may apply for leave, which is due and admissible to him and it shall not be refused on the ground that another type of leave should be taken in the particular circumstances, similarly, under Rule-13 whereof application for leave must be made to the head of office, where a civil servant is employed and head of the Department, while granting the same, shall notify it in the official gazette. In such eventuality, it can safely be concluded that petitioner was neither treated in accordance with law, nor his legal vested rights have been appreciated, rather he has been subjected to abuse of authority by respondent No.2 for ulterior motives and malafide intentions, which has caused grave miscarriage of justice.

- C. That the impugned notification is penal in nature, which cannot be issued without providing proper opportunity of being heard and specific inquiry procedure is to be followed, however, disregarding all the norms of natural justice have been violated as petitioner was neither associated with the impugned proceedings, nor any show cause notice was issued to him, hence has been condemned unheard, therefore, principle of *audi-alterim-partem* is attracted.
- D. That the impugned notification/ order etc are based on discrimination and detrimental to more than 22 years spotless service career of petitioner and respondent No.2, without caution/ care and its legal consequences, not only repatriated him prematurely from the post of Project Director, but is bent upon to

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 Deputy Registrar  
 23 FEB 2015

~~TESTED~~  
 EXAMINED  
 Registrar  
 23 FEB 2015

compel him to assume charge of the post of Assistant Director at Chitral, being specified for officer in BPS-17 and, that too, issued another office letter, whereby bare threats of dire consequences have been extended by overlapping his jurisdiction and authority conferred upon him by the law and constitution, therefore, Indulgence of this Honourable Court under Article-199 of the Constitution is attracted in order to ensure fair play and justice and to uphold the constitution and rule of law.

- E. That issuance of the impugned notification/ order is in disregard of the binding dictas of the Honourable Supreme Court of Pakistan, whereby a Government official is restrained not to obey the illegal orders of the superiors, particularly, the principle laid down in prominent case of "Anita Turab", reported in PLD 2013 SC 195.
- F. That the impugned notification/ order has been issued in disregard of the famous judgment in case of Defence of Pakistan, reported in 2013 SCMR 1707, whereby this Honourable Court has jurisdiction under Article-199 to entertain the instant petition and to issue appropriate writ to the concerned quarters by declaring the impugned notification and all subsequent actions of the respondents as coram-non-judice and not able to be acted upon.
- G. That any other ground, with the permission of this Honourable Court, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant Writ Petition, the impugned notification 09.12.2014, office letter dated 16.02.2015 and impugned actions of respondents may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect and respondents may further be directed to allow application of petitioner for leave without pay in accordance with law, so as to secure the ends of justice.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Court in circumstances of the case may also be granted to the petitioner.

FILED TODAY  
Deputy Registrar  
23 FEB 2015

ATTESTED  
Deputy Registrar


(64)

**INTERIM RELIEF:**

By way of interim relief, operation of office letter dated 16.02.2015 may please be suspended till final decision of the titled Writ Petition.

THROUGH

  
 PETITIONER

  
 AMIN-UR-REHMAN  
 ADVOCATE, PESHAWAR

DATED: 23.02.2015

**CERTIFICATE:**

As per instructions of my client, certified that no such **Writ Petition** on subject matter has earlier been filed by the petitioner before this Honourable Court.

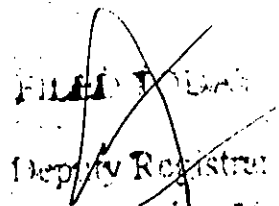
  
 ADVOCATE
**LIST OF BOOKS:**

1. Constitution of Islamic Republic of Pakistan, 1973.
2. Case Law according to need.

  
 ADVOCATE

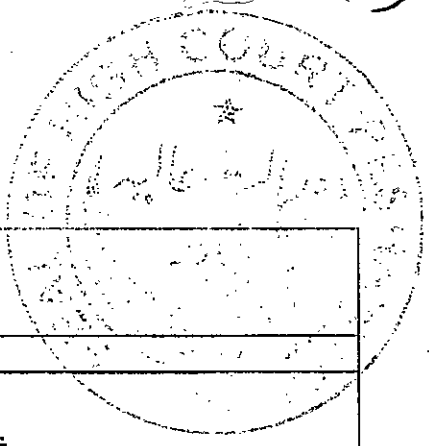
  
 ATTESTED
EXAMINER  
Peshawar High Court

18 MAR 2015

  
 Deputy Registrar  
 23 FEB 2015

Annex - (K) (65)

FORM 'A'  
FORM OF ORDER SHEET  
Court of -----  
Case No. ----- of ----- 200



Serial No of Order or proceedings	Date of Order Or proceedings	
1.	2.	3.
	03.03.2015	<p><u>W.P.No.558-P/2015 with I.R.</u></p> <p>Present: Mr.Amin-ur-Rehman, Advocate, petitioner.</p> <p>-----</p> <p><b>MUHAMMAD DAUD KHAN, J.-</b> Riaz Ahmad,</p> <p>the petitioner, seeks constitutional jurisdiction of this Court praying that:</p> <p><i>“It is, therefore, most humbly prayed that on acceptance of instant Writ Petition, the impugned notification dated 09.12.2014, office letter dated 16.2.2015 and impugned actions of respondents may please be declared as illegal, unlawful, without lawful authority, void-ab-initio and of no legal effect and respondents may further be directed to allow application of petitioner for leave without pay in accordance with law, so as to secure the ends of justice”.</i></p> <p>2. Brief facts of the case are that the petitioner was appointed as Assistant Director (BPS-17) on 19.1993 on the recommendation of Khyber Pakhtunkhwa Public Service Commission and</p>

MDA

~~ATTESTED~~  
EXAMINER  
Peshawar High Court  
18 MAR 2015

66

thereafter, his post was upgraded to BPS-18 vide Notification dated 25.7.2013; that on 28.6.2012, the petitioner was posted as full time Project Director (MSDP) under the supervision of Local Government Elections & Ruler Development Department on deputation for a period of three years; that vide office order dated 29.10.2014, respondent No.2 repatriated the petitioner without completion of his tenure and in compliance thereof, he submitted his arrival report on 31.10.2014; that the petitioner applied to respondent No.2 for grant of two years leave without pay on the ground of serious illness of his father but respondent No.2 instead of considering such application, transferred and posted the petitioner as Assistant Director, Local Government Elections and Rural Development Department, Chitral vide Notification dated 9.12.2014; that on 18.12.2014, the petitioner preferred departmental appeal to respondent No. 1 for grant of two years leave without pay and cancellation of transfer order

m/s

~~ATTESTED~~  
EXAMINER  
Peshawar High Court  
18 MAR 2015



dated 9.12.2014 but of no avail, hence, respondent No.2, vide order dated 16.2.2015, directed the petitioner to assume charge of the post of Assistant Director, Local Government Elections and Ruler Development Department, Chitral within seven days, failing which, he will be proceeded against under the Khyber Pakhtunkhwa Government Servant (Efficiency & Disciplinary) Rules, 2011. Hence, the instant Writ Petition.

3. We have heard the learned counsel for the petitioner and have perused the available record.

4. Admittedly, the petitioner is a civil servant and his grievance relates to '*terms and conditions*' of service, the appropriate remedy for seeking his redressal, would surely be the Services Tribunal.

5. This Court is barred under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 to take cognizance of any matter relating to '*terms and conditions*' of service of a civil servant. It is now settled by the Apex Court that even for matters

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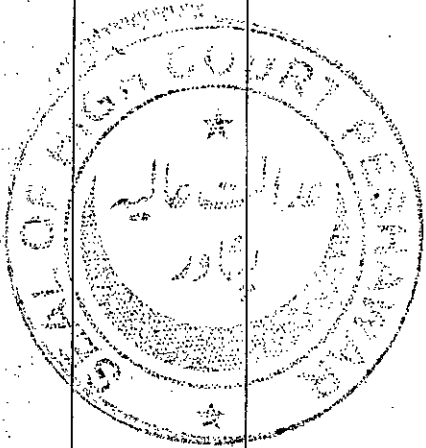
~~ATTESTED~~

~~EXAMINER~~  
Peshawar High Court

18 MAR 2015

relating to the malafide, discrimination or even challenging the vires of the Rules by a civil servant, appropriate forum for the redressal is Services Tribunal.

6. In view of the above, this Writ Petition being not maintainable is hereby dismissed in limine along with Interim Relief. However, the petitioner may seek his legal remedy before appropriate forum.



*Sd/ Nawab Ahmad Seth*  
*Sd/ Muhammad Daud Khan*

JUDGE

CLERK

**CERTIFIED TO BE TRUE COPY**

Examiner  
 Peshawar High Court, Peshawar  
 Authorised Under Article 87 of  
 The Qanun-e-Shahadat Order 1984

18 MAR 2015

No. 16898  
 Date of Presentation of Application 18/3/15  
 No of Pages 11-P  
 Copying fee 1  
 Urgent Fee 1  
 Total 2200  
 Date of Preparation of Copy 18/3/15  
 Date Given For Delivery 18/3/15  
 Date of Delivery of Copy 18/3/15  
 Received By [Signature]

\*Nawab Shah\*