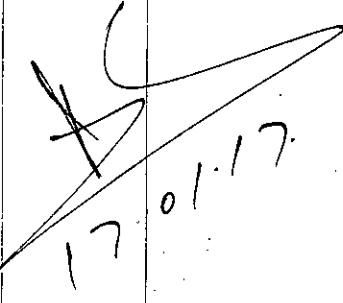


S.No. of proceedings	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	17.01.2017	<p align="center"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>CAMP COURT ABBOTTABAD</u></p> <p align="center">Service appeal No. 11/2016</p> <p align="center">Mst. Suriya Bibi Versus Government of Khyber Pakhtunkhwa through Secretary Health Department, Peshawar and two others.</p> <p align="center"><u>JUDGMENT</u></p> <p align="center"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:</u></p> <p>Counsel for the appellant and Mr. Muhammad Siddique, Senior Government Pleader alongwith M/S Amjad Ali, Assistant, Dr. Muhammad Irshad, Mst. Sobia L.H.V and Dr. Muhammad Daud, M.S for respondents present.</p> <p>2. Mst. Suriya Bibi wife of Syed Kifayat Hussain Shah hereinafter referred to as the appellant has preferred the instant service appeal under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against original order dated 08.10.2011 vide which the appellant was dismissed from service and that of appellate authority dated 06.11.2015 vide which her departmental appeal was rejected and hence the instant service appeal on 04.01.2016.</p> <p>3. Brief facts giving rise to the present appeal are that the appellant was appointed as Dai BPS-02 in the Health Department Batagram when</p>

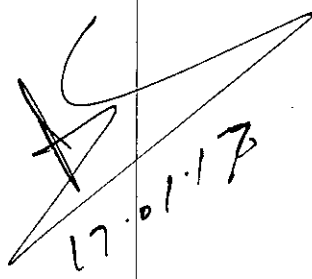
dismissed from service vide original order dated 08.10.2011 on the allegations of wilful absence and due to securing appointment on the basis of a fake diploma. Aggrieved from the said original order she preferred departmental appeal on 05.03.2012 and finally service appeal No. 877/2012 before this Tribunal which was decided vide judgment dated 16.09.2015 directing the appellate authority to decide the departmental appeal of the appellant on merits which was rejected vide impugned final order referred to above.

4. Learned counsel for the appellant has argued that the appellant has secured 3 months leave as her minor child was suffering from heart disease and which leave was allowed to her by the District Health Officer Batagram on 12.09.2011. He further argued that neither any enquiry was conducted nor opportunity of hearing afforded to the appellant. That in case of illegal appointment the authority making such appointment should have been proceeded against under the Government Servants (E&D) Rules. That despite the judgment of this Tribunal the departmental appeal of the appellant was rejected in a slip shod manner.

5. Learned Government Pleader has argued that the enquiry was conducted in the mode and manners prescribed by rules and that the appellant remained absent and therefore he was rightly dismissed from service. That she failed to produce any evidence in support of disease and treatment of her child.

6. We have heard arguments of learned counsel for the parties and perused the record.

7. We are constrained to observe, at the very first instance, that the

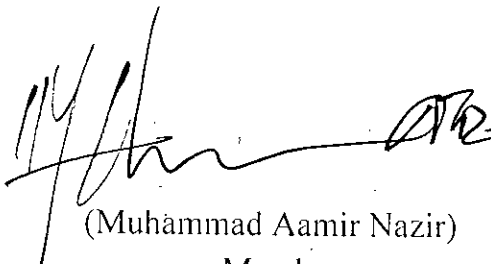

17.01.17


Director General Health Services Khyber Pakhtunkhwa Peshawar failed to pay due attention to the judgment of this Tribunal dated 16.09.2015 and passed the final order in a cursory and irresponsible manner. Had he perused the record of the case of the appellant he would have come to know that either EDO (Health) Batagram or another officer of his establishment had allowed the application for leave of the appellant vide order dated 12.09.2011. It is also evident from the record that no enquiry whatsoever was conducted by Dr. Muhammad Arshad, the stated enquiry officer. It is a sorry state of affairs that a female serving against a lower post is treated by the all concerned in irresponsible and undesirable manner and is compelled to run from the pillar to post. Since the appellant was afforded no opportunity of hearing and the enquiry was not conducted in the mode and manner prescribed by rules as such we are left with no option but to accept the present appeal reinstate the appellant in service with all back benefits by placing the respondents at liberty to conduct denovo enquiry against the appellant within a period of 2 months from the date of receipt of this judgment.

8. We also direct that in case appointment order of the appellant is found illegal then all those who had facilitated and participated in the said process of illegal appointment shall be departmentally proceeded against. We further direct that in case the application of the appellant for leave was found to have been allowed by a person other than the concerned authority then the person allowing the application be also proceeded against beside those who failed to initiate action and, instead, extended him protection.

17.01.17

9. We direct that if the enquiry against appellant is not conducted and concluded within a period of 2 months from the date of receipt of this judgment then the respondents shall have no privilege to proceed against the appellant and, in such eventuality, the financial benefits payable to the appellant on reinstatement shall be recoverable from the authority passing the impugned order. Parties are left to bear their own costs. File be consigned to the record room.


(Muhammad Aamir Nazir)
Member


(Muhammad Azim Khan Afridi)
Chairman
17-01-17
Camp Court, Abbottabad

ANNOUNCED

17.01.2017

11/16

19.5.2016


Counsel for the appellant and Mr. Muhammad Arshad SO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 17.08.2016 at camp court, Abbottabad..


Chairman

Camp court, A/Abad

17.08.2016

Appellant with counsel, M/S Amjad Ali, Assistant and Shah Rahman, Assistant alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Counsel for the appellant seeks adjournment. To come up for rejoinder and final hearing before the D.B on 17.1.2017 at camp court, Abbottabad.


Chairman

Member

Camp court. A/Abad.

20.1.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Dai when subjected to inquiry on the allegations of wilful absence and dismissed from service vide impugned order dated 8.10.2011 which was assailed in departmental appeal and where-after service appeal was preferred which was decided on 16.9.2015 wherein directions were issued to the appellate authority to decide the appeal of the appellant within a period of two months. That the appellate authority rejected the appeal on 6.11.2015 but the same was not communicated to the appellant which came in her notice on 29.12.2015 where-after the instant service appeal was preferred on 4.1.2016.

Appellant Deposited
Security & Process Fee

That the appellant has never remained absent wilfully as she was granted three months leave and during the said period she was considered absent and subjected to inquiry which was also not conducted in the prescribed manners as no show cause notice was ever issued to the appellant and, moreover, the appellant has never posed to hold any diploma as such the proceedings are nullity.

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 16.3.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad

16.03.2016



Counsel for the appellant and Mr. Muhammad Arshed, SO alongwith Mr. Muhammad Saddique, Sr. GP for respondents present. Requested for adjournment. To come up for written reply/comments on 19.5.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. _____ 11/2016 _____

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	04.01.2016	<p style="text-align: center;">The appeal of Mst. Suriya Bibi received today by post through Mr. Hamayun Khan 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	5-1-16	<p style="text-align: center;">This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>20-1-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL, KHYBPER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 11 /2016

Mst. Suriya Bibi W/o Syed Kifayat Hussain Shah, Ex-Dai, resident of Village Tarmaki Garam Thoon, Khanpur, Tehsil & District, Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Health, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Service Appeal	1 to 8	
2.	Application for condonation of delay	9 to 10	
3.	Copy of appointment order	11	"A"
4.	Copy of application	12	"B"
5.	Copy of termination order	13	"C"
6.	Copy of departmental appeal	14	"D"
7.	Copy of appeal	15-20	"E"
8.	Copy of comments	21-24	"F"
9.	Copy of judgment dated 16/09/2015	25-27	"G"
10.	Copy of order dated 06/11/2015	28	"H"
11.	Wakalatnama		


 ...APPELLANT

Through;

Dated: 01st January, 2016


 (HAMAYUN KHAN)

Advocate High Court Abbottabad
Office No. 4, Hayat Sherpao Lawyer
Plaza, Kutchery Compound,
Abbottabad

Cell No. 0345-9557912, 0312-0861681

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

Service Appeal No. 11 /2016

Mst. Suriya Bibi W/o Syed Kifayat Hussain Shah, Ex-Dai, resident of Village Tarmaki Garam Thoon, Khanpur, Tehsil & District, Haripur.

...APPELLANT

VERSUS

S.W.F. Province
Service Tribunal
Diary No. 08
dated 04-01-2016

1. Govt. of Khyber Pakhtunkhwa, through Secretary Health, Peshawar.
2. Director General Health Service, Khyber Pakhtunkhwa, Peshawar.
3. District & Health Officer, Battagram.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974, AGAINST THE IMPUGNED ORDER NO.
11518-19/PERSONAL DATED 06/11/2015
PASSED BY RESPONDENT NO. 2 AND
ORDER DATED 08/10/2011 PASSED BY
RESPONDENT NO. 3 ARE ILLEGAL,
UNLAWFUL, WITHOUT LAWFUL
AUTHORITY, MISUSE OF POWER, AB-

Handwritten:
The to-day
Law
Register
4/1/2016

INITIO, AGAINST THE LAW, AGAINST THE
FUNDAMENTAL RIGHTS, AND AGAINST
THE PRINCIPLE OF NATURAL JUSTICE,
HENCE, LIABLE TO BE SET ASIDE.

PRAYER: ON ACCEPTANCE OF THIS
APPEAL, THE TERMINATION ORDER
DATED 08/10/2011 AND ORDER DATED
06/11/2015 MAY KINDLY BE DECELED AS
NULL, VOID AB-INITIO, AGAINST THE LAW,
RULES, AGAINST THE FUNDAMENTAL
RIGHTS OF THE APPELLANT AND
APPELLANT MAY KINDLY BE REINSTATED
WITH ALL BACK BENEFITS AND ANY
OTHER RELIEF WHICH THIS HONOURABLE
TRIBUNAL MAY DEEM FIT AND PROPER IN
THE CIRCUMSTANCES MAY ALSO BE
GRANTED TO APPELLANT.

Respectfully Sheweth:-

1. That appellant was appointed as "Dai" in BPS-02
in Health Department, Battagram. Copy of
appointment order is annexed as Annexure "A".

2. That thereafter appellant continuously performed duty with full devotion and liability.
3. That unfortunately the daughter of the appellant got seriously sick as she had earlier undergone Open Heart Operation. That for treatment of daughter in Rawalpindi Hospital appellant applied for leave of three months vide application dated 12/09/2011 which was allowed by Executive District Health Officer (DHO)/ respondent No. 3. Copy of application is annexed as Annexure "B".
4. That when appellant along with her daughter was in Rawalpindi Hospital for treatment, respondent No. 3 initiated so-called inquiry against the appellant on so-called and self made allegations in absence of appellant and without any show cause notice or giving any opportunity to appellant and terminated her service vide letter No. 4510-15 dated 08/10/2011. Copy of termination order is annexed as Annexure "C".
5. That feeling aggrieved appellant filed department appeal before the respondent No. 2 on 05/03/2011.

but no response given to the appellant and similarly not passed any order on the said appeal. Copy of departmental appeal is annexed as Annexure "D".

6. That thereafter appellant filed service appeal No. 877/2012 before this Honourable Tribunal. Copy of appeal is annexed as Annexure "E".
7. That thereafter respondents submitted comments/ reply after laps of 3 year and did many time Hanky Panky with this Honourable Court. Copy of comments is annexed as Annexure "F".
8. That on 10/06/2015 appellant submitted rejoinder and appeal was fixed for arguments.
9. That on 16/09/2015, after hearing of arguments of learned members of the Tribunal remit the appeal of the appellant to appellate authority/ respondent No. 1 because appellate authority was not passed any order on the departmental appeal of the appellant dated 05/03/2011. Copy of judgment dated 16/09/2015 is annexed as Annexure "G".

10. That thereafter Registrar of this Tribunal send judgment dated 16/09/2015 to DHO/ respondent No. 3 and he send the said judgment to respondent No. 2 on 28/10/2015 and similarly through another letter No. 2654 dated 14/10/2015 Registration No. 1577 send to respondent No. 1 for disposal of the appeal.

11. That appellant time and again visited to the offices of respondents No. 1 & 2 in respect on the decision on the judgment dated 16/09/2015 passed by this Tribunal but officials of respondents Nos. 1 & 2 not informed about actual position. On 05/11/2015 respondent No. 2 passed order on the judgment dated 16/09/2015 through order No. 11518-19/Personal dated 06/11/2015 and respondent No. 1 till date not passed any order on the judgment dated 16/09/2015 and order dated 06/11/2015 not delivered and not informed to the appellant about order of respondent No. 2 and passed without personal hearing and recently appellant received the said impugned order on 29/12/2015 from the office of respondent No. 3 after many request which is show the malafide of the respondents and

personal enmity with the appellant. Copy of order dated 06/11/2015 is annexed as Annexure "H".

12. That feeling aggrieved of the orders passed by respondents No. 2 & 3 appellant assails the same, through the instant appeal, inter-alia, on the following grounds among many others;-

GROUNDS:-

- a. That the termination order dated 08/10/2011 and 06/11/2015 is illegal, unlawful, without lawful authority, perverse, capricious and is against the constitutional guaranteed rights of the appellant, hence, untenable in the eyes of law and is liable to be set-aside.
- b. That neither any charge sheet was served upon the appellant nor she was associated with any inquiry, hence, the termination order is based on political influence, exparte inquiry, therefore, liable to be set-aside.
- c. That if the opportunity had been granted to the appellant, she would have prove her

7

valid, credentials and the facts that her leave was dully approved by the respondent No. 3.

- d. That the appellant was condemned unheard and she did not given opportunity for personal hearing to bring the real and true facts on the screen.
- e. That even otherwise the impugned order dated 08/10/2011 and 06/11/2015 is liable to be set-aside on the grounds that no right of defense or personal right of hearing which are mandatory to provision of law was given to the appellant before being proceeded against her.
- f. That the impugned order was passed against the appellant with malafide, against law as void and without jurisdiction.
- g. That the whole disciplinary proceedings initiated against the present appellant have been done in contravention to the rules, regulation and law and therefore, the whole proceedings are liable to be set-aside and appellant be reinstated to her original post.

- h. That the addresses of the parties have been correctly given in the heading of the appeal.
- i. That other points shall be urged at the time of arguments with due leave of this Honourable Court.

It is, therefore, humbly prayed that on acceptance of this appeal, the termination order dated 08/10/2011 and order dated 06/11/2015 may kindly be declared as null, void ab-initio, against the law, rules, against the fundamental rights of the appellant and appellant may kindly be reinstated with all back benefits and any other relief which this Honourable Tribunal may deem fit and proper in the circumstances may also be granted to appellant.

نزیاء بی بی
...APPELLANT

Through;

Dated: 01st January, 2016


(HAMAYUN KHAN)
Advocate High Court Abbottabad

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

نزیاء بی بی
...APPELLANT

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

Service Appeal No. _____/2016

Mst. Suriya Bibi W/o Syed Kifayat Hussain Shah, Ex-Dai, resident of Village Tarmaki Garam Thoon, Khanpur, Tehsil & District, Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Health, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR CONDONATION OF DELAY IF ANY

Respectfully Sheweth:-

1. That the above titled appeal is being filed before this Honourable Tribunal. Ingredients of the same may kindly be treated as integral part of this application.
2. That the appellant has brought a good prima facie, arguable case and balance of convenience also lies in his favour. Moreover, there is every likelihood of his success.
3. That impugned order dated 06/11/2015 received on 29/12/2015 and respondents intentionally malafide not deliver orders as well as actual position about order dated 06/11/2015 to the appellant and they did joking on every visit when appellant went to offices of respondents.

It is, therefore, humbly prayed that on acceptance of instance application, condonation of delay may graciously be condoned if any.

سُریا بی

...APPELLANT

Through;

Dated: 01st January, 2016


(HAMAYUN KHAN)

Advocate High Court Abbottabad

AFFIDAVIT:-

I, Mst. Suriya Bibi W/o Syed Kifayat Hussain Shah, Ex-Dai, resident of Village Tarmaki Garam Thoon, Khanpur, Tehsil & District, Haripur, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

سُریا بی

DEPONENT



Annexure 'A'

OFFICE OF THE EXECUTIVE DISTRICT
OFFICER (HEALTH) BATTAGRAM

No. 1535 /PF Dated: 16/03/2009

To:

Miss Soryia Bibi W/O Syed Kefayat Hussain Shah
R/O Village Tarmaki Khanpur District & Tehsil Haripur

Subject:

APPOINTMENT ORDER AS DAI

Memo:

Reference your application dated Nil. You are hereby appointed as Dai BPS-02 (3035-100-6035) against the vacant post of Dai at BHU Sakargah on the following terms and conditions:-

1. You will be placed as B/S BPS-02 (3035-100-6035) Per Month with other facilities as permissible to the Government servant of the same scale.
2. Your services will be governed under the Government of NWFP contract policy 2005.
3. Your appointment will be subject to provide Medical Fitness Certificate (Health & Age) for Government service from Medical Superintendent DHQ Hospital Battagram.
4. If you wish to resign from service, two month advance notice or to deposit two month salary in lieu of.
5. Your service can be terminated at any time with out any reasons by the competent authority.
6. You will be provided the same facilities under C.P fund as admissible to the Government servant as the rates to be prescribed by the government 05% of minimum pay be the employee and 05% contribute by the Government.
7. You will not contribute to GP Fund and shall not be entitle for pension and gratuity benefits.
8. Where the employee remains absent with out leave for a period of Seven (07) days he/she shall be deemed to have violated the relevant contract provisions and shall be terminated from service.
9. The contract employee shall be responsible for all utility bills and other charges of residential accommodation as is applicable to the same category of staff.
10. The contract employee shall be subject to all rules of Govt: pertaining to a Civil Servant rules, in respect of efficiency and discipline, conduct, liability to criminal proceeding etc and any special rules, instructions issued by the Health Department specified to employees for breach of discipline or unsatisfactory service. The Health Department competent to terminate the contract employee without notice or compensation.
11. No contract employee shall indulge in any trade, business or occupation or any activities, which is prohibited for a regular Govt: servant.
12. Spouse policy shall not be applicable to the contract employee.
13. Yours appointment is purely temporary basis.
14. No TA/DA will be allowed for joining the duty or Medical fitness certificate
15. If you accept the offer of appointment on above terms and conditions, you should produce Health and Age Certificate from Medical Superintendent DHQ Hospital Battagram and report to Incharge BHU Sakargah with in 15 days of the issuance of this order. The offer will be cancelled, if you fail to report for duty with in the above mentioned period.

No. 1536-61/PF

Copy forwarded to the:-

1. Director General Health Services, NWFP Peshawar.
2. Senior Manager Save the Children Battagram.
3. District Coordination Officer Battagram.
4. District Accounts Officer Battagram
5. Incharge BHU Sakargah
6. Accounts Section undersigned office.

Executive District Officer
Health Battagram

Executive District Officer
Health Battagram

Attested

[Signature]

ATTESTED

Attested
A. J. [Signature]

12/29/11

12/29/11

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Annexure 'B'

12

(11)

Annexure

"C"

13

OFFICE OF THE EXECUTIVE DISTRICT
OFFICER HEALTH BATTAGRAM.

OFFICE ORDER.

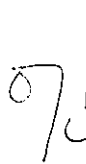
Mrs: Sorrya Bibi W/o Kafayat Hussain Shah was appointed as Dai against the vacant post of the Dai by the than EDO Health Battagram office order No. 1555 dated 16.07.2009. but during the verification of her documents/Certificate was found fake and bogus vide EDO Health Abbottabad office No. 5921/Estab:/EDO Health ATD dated 31.09.2011. later on then the Directive of DGHS Khyber Pakhtoonkhwa Peshawar No. 7632-33/Personal dated 29.08.2011 asked about verification of her document/Certificate and furnished comments on request of Dai vide this office order No. 4272 dated 08.09.2011. in this regards DGHS K.P.K Peshawar telephonic directive that the undersigned is competent authority to terminate her in the light of her fake certificate.

Further more she is continuously absent and not taken interest in her duty, as the undersigned call explanation on 12.09.2011 and show cause given and charge sheeted on 16.09.2011 under letter No. 4369 on dated 26.09.2011. Dr. Mohammad Arshid Coordinator EPI appointed as enquiry officer. But she were still absent. In this regard the undersigned office issued Show Cause.

On the ground of above allegation and according to the recruitment policy she must trained and having training certificate which should be verified from DGHS K.P.K Peshawar office but she could not full fill the terms and conditions according to service recruitment rule

Further more she is found guilty regarding continuously absentee without any information or prior permission from the undersigned.

Therefore the service of Mrs: Sorrya Bibi W/o Kafayat Hussain Shah is hereby terminated under E&D rule with immediate effect


Executive District Officer,
Health Battagram.

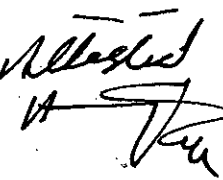
No. 4510-15 / Dated Battagram the,

08/10/2011.

Copy forwarded to the:-

1. Director General Health Services K.P.K Peshawar for information
2. District Coordination Officer Battagram for information.
3. Project Manager Save the Children Battagram
4. Incharge RGC Kuza Bana
5. Official Concerned


Executive District Officer,
Health Battagram

Attested


ATTESTED

Attested
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Annex
14

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Amendment Eⁿ 15

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 877 /2012

Mst. Suriya Bibi wife of Syed Kifayat Hussain Shah R/o Village Tarmaki
Khanpur Tehsil & District, Haripur.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary.
2. Secretary Health Khyber Pakhtunkhwa, Peshawar.
3. Executive District Officer Health Battagram. - DHO Battagram
4. Administrator BHU Sakargah.

...RESPONDENTS

AMENDED APPEAL

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHAWA SERVICE TRIBUNAL ACT 1974
FOR DECLARATION TO THE EFFECT THAT ORDER
OF EXECUTIVE DISTRICT OFFICER HEALTH
BATTAGRAM DATED 08/10/2011 IS ILLEGAL,
UNLAWFUL, WITHOUT LAWFUL AUTHORITY, AB-
INITION, AGAINST THE LAW AND PRINCIPAL OF
NATURAL, THEREFORE LIABLE TO BE SET-ASIDE.

Attested
A. Ra

=====

PRAYER: ON ACCEPTANCE OF THIS APPEAL, THE TERMINATION ORDER DATED 08/10/2011 MAY KINDLY BE DECLARED AS NULL, VOID, AB-INITIO, AGAINST THE LAW, RULES AND AGAINST THE FUNDAMENTAL RIGHTS OF THE APPELLANT. THEREFORE, APPELLANT MAY KINDLY BE REINSTATED WITH ALL BACK BENEFITS ^{and} OR ANY OTHER RELIEF WHICH THIS HONOURABLE COURT MAY DEEM FIT AND PROPER IN THE CIRCUMSTANCES MAY ALSO BE GRANTED TO THE APPELLANT.

=====

Respectfully Sheweth:-

1. That the appellant was appointed as DAI BPS-02 at BHU Sakargah on 16/07/2009. Copy of the appointment order is attached as Annexure "A".
2. That the appellant performed her duty with full devotion and dedication at RHC Kuzabanda and she was transferred to Haripur vide letter/office order No. 7647-5 dated 05/09/2011 by Director General Health Services Khyber Pakhtunkhwa. Copy of office order dated 05/09/2011 is attached as Annexure "B".

Attested
H. J. Khan

3. That unfortunately the daughter of the appellant got seriously sick as she had earlier undergone a heart operation. The appellant had to take her daughter to Rawalpindi hospital. Hence, the appellant applied for leave of three months vide application dated 12/09/2011, which was allowed by Executive District Officer Health Battagram. Copy of the doctors prescription and leave application dated 12/09/2011 is attached as Annexure "C" & "D".
4. That when the appellant alongwith her daughter was in Rawalpindi hospital for treatment, it transpired that the Executive District Officer Health Battagram had initiated inquiry against the appellant for her willful absence and without any show cause notice or giving any opportunity to the appellant had terminated her services vide letter No. 4510-15 dated 08/10/2011. Copy of the termination order, recently received on 07/02/2012 is attached as Annexure "E".
5. That feeling aggrieved, appellant filed departmental appeal before the Director General Health on 05/03/2011 but no response has yet been given to the appellant nor her child health has recovered. Copy of departmental appeal is attached as Annexure "F".

Attested
A. J. Khan

6. That, the appellant seeks indulgence of this Honourable court for her redressal, inter-alia on the following grounds:-

GROUNDS:-

- a. That the termination order dated 08/10/2011 is illegal, unlawful, without lawful authority, perverse, capricious and is against the constitutional guaranteed rights of the appellant, hence, untenable in the eyes of law and is liable to be set-aside.
- b. That neither any charge sheet was served upon the appellant nor she was associated with any inquiry, hence, the termination order is based on political influence, ex-parte inquiry, therefore, liable to be set-aside.
- c. That if the opportunity had been granted to the appellant, she would have prove her valid, credentials and the facts that her leave was dully approved by the respondent No. 3.
- d. That the appellant was condemned unheard and she did not given opportunity for personal

Attested
M. J. J. J.

hearing to bring the real and true facts on the screen.

- e. That even otherwise the impugned order dated 08/10/2011 is liable to be set-aside on the grounds that no right of defense or personal right of hearing which are mandatory to provision of law was given to the appellant before being proceeded against her.
- f. That the impugned order was passed against the appellant with malafide, against law as void and without jurisdiction.
- g. That the whole disciplinary proceedings initiated against the present appellant have been done in contravention to the rules, regulation and law and therefore, the whole proceedings are liable to be set-aside and appellant be reinstated to her original post.
- h. That the addresses of the parties have been correctly given in the heading of the appeal.

Attested
H. [Signature]

- i. That other points shall be urged at the time of arguments with due leave of this Honourable Court.

It is, therefore, humbly prayed that on acceptance of this appeal, the termination order dated 08/10/2011 may kindly be declared as null, void, ab-initio, against the law, rules and against the fundamental rights of the appellant, therefore, appellant may kindly be reinstated with all back benefits or any other relief which this Honourable Court may deem fit and proper in the circumstances may also be granted to the appellant.

Through

شریانی
...APPELLANT

Dated: 13/01/2014

H
Council

VERIFICATION:-

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

شریانی
APPELLANT

Attested
H
H

Annexure "F" 21

BEFORE THE HONORABLE KHYBER PAKHTUNKHAWA SERVICE
TIBUNAL, PESHAWAR

Services Appeal No 877/12

MISS SORYA BIBIAPPELLANT / PETITIONER

VERSUS

1. THE GOVERNMENT OF KHYBER PAKHTUNKHAWA
THROUGH SECRETARY HEALTH PESHAWAR
2. DISTRICT HEALTH OFFICER
BATTAGRAM.....RESPONDENT

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO 1 & 2

Respected sheweth,

Preliminary objection

1. That the appeal is not acceptable and not maintainable.
2. That the appellant has neither cause of action nor locus standi.
3. That the appellant is estopped by her own conduct to bring the present appeal.
4. That the appeal is badly time barred.

Attested
24/11/12
[Signature]

ON FACTS

1. Incorrect. The appellant was appointed as Dai at BHU Sakargah vide this office order no. 1556-61 dated 16.07.2009. (After that she was posted at Civil Dispensary Phagora vide office order No. 1940-44 dated 01.10.2010. During her service at CD Phagora due to her personal problems and FIR against her, later on honorable court given decision against her during the trial she was suspended from service and after that she was transferred to RHC Kuza Banda)
2. The undersigned office sent her certificate of Dai for verification to EDO Health Abbottabad. The same certificate found fake / bogus.
3. Miss. Sorya Bibi Dai were remained absent from her duty with effect from 09.09.2011. The undersigned office called explanation for clearness of her position of will full absence, but she failed to resume her duty or explain her position. When her reply not reached in time, this office charge sheeted vide this office No. 4369 dated 16.09.2011 but she failed to resume her duty.

Attested
H. Khan


4. The appellant has been attached an application with her appeal that she granted three months leave. The said application not submitted to the EDO Health Office Battagram nor forwarded from the RHC Kuza Banda. The application signed by her self and attached with her appeal. It seems that she is performing / involved in bogus and fake activities.
5. This^o office conducted an enquiry through Dr. Muhammad Arshad Coordinator EPI. He submitted his enquiry report in which he reported that Mst: Sorya Bibi Dai did not appear before inquiry officer and still absent from her duty from the last 20 days with out any information.
6. According to her appointment order clause 8 (when the employee remain absent with out leave for a period of seven days. She shall be deemed to have violated the relevant contract provision and shall be terminated from service.
7. In the light of above facts (1. Having bogus certificate on which she got job, 2. Regular absentee from duty with out any information.) the services of Miss Sorya Bibi Dai was terminated vide this office order No.4510-15 dated 08.10.2011.

Mst. Sorya Bibi Dai
[Signature]

GROUNDS


1. The termination order is with in law, rules and no violation has been done.
2. As explained in Para "3" above.
3. As explained in Para "4" above.
4. As explained in Para "5" above.

It is humbly prayed that the appeal in hand may be dismissed with cost.


 District Health Officer
 Battagram
 Respondent No. 2

Secretary Health
 Government of KPK Peshawar
 Respondent No. 1

Veli
also please submit
the counter affidavit
Sub - along with relevant
documents if any.

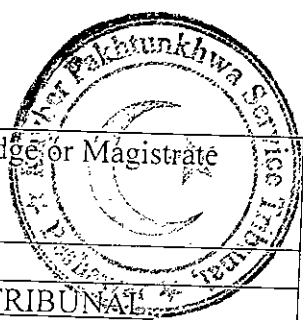

 Addl. Advocate General
 (Service Tribunal) KPK
 Peshawar.

Attested


~~Ammeave "G"~~

25

Ammeave "G"



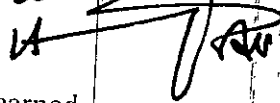
S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	16.09.2015	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> <u>PESHAWAR.</u></p> <p style="text-align: center;">APPEAL NO.877/2012</p> <p style="text-align: center;">(Mst. Suriya Bibi -vs- Secretary Health, KPK, Peshawar and others).</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER:</u></p> <p>Appellant with counsel (Mr. Hamayoon Khan, Advocate) and Mr. Shah Jehan, Assistant alongwith Government Pleader (Mr. Muhammad Jan) for respondents present.</p> <p>2. Appellant Mst. Suriya Bibi was appointed as DAI (BPS-02) vide appointment order dated 16.07.2009 issued from the office of EDO Health, Batagram. At the relevant time she was posted at RHC Kuzabanda. The Competent Authority vide his order dated 08.10.2011 on the charges of fake documents and absence from duty w.e.f 12.09.2011, terminated her from service. According to appellant, her departmental appeal dated 05.03.2012 was not responded by D.G Health Khyber Pakhtunkhwa, Peshawar, hence this service appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.</p> <p>3. Arguments of the learned counsels for the appellant and Learned GP heard at length and record perused with their assistance.</p> <p>4. In defense of the appellant about her absence it was argued that she</p>

Attested
vs
PR

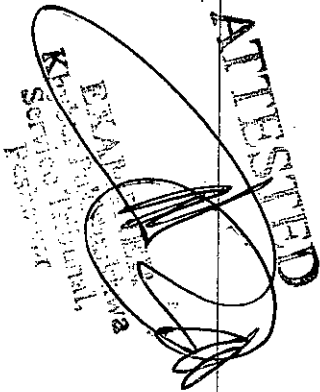
ATTESTED

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

was on leave dully allowed by the DHO (EDO Health) Dr. Aqeel Bangash, therefore the charges of absence against the appellant is false. It is worth mentioning that according to the respondent-department even this leave application is bogus and self-prepared. So far the issue of fake documents is concerned plea of the appellant is that no diploma is required for the post of DAI therefore, the charge of producing fake diploma is also false. We have perused the record in which we found letter of EDO (Health) Abbottabad bearing No. 5921 dated 31.05.2011 according to which as the appellant had not attended one year training course therefore her certificate for such course was not genuine. Evidently, the issue is not about fake diploma but about fake course certificate. The record further reveals that the charges of absence were inquired into by Dr. Muhammad Arshad. In this regard learned counsel for the appellant submitted that there never was any Doctor with the said name.

Attested


5. After hearing learned counsel for the appellant and learned Government Pleader for the respondent-department at quite length, the Tribunal is of the considered opinion that as the departmental appeal of the appellant has not yet been decided and the controversy highlighted above is factual in nature, therefore, we would like to remit the case to the appellate authority with the direction to decide the same within a period of two months after receipt of this judgment. The appellate authority may determine as to whether such course certificate/diploma was required for the post of DAI and if required as to whether the one produced by appellant was genuine or otherwise? and Secondly also to determine as to whether the appellant remained willfully absent from duty or not as she relies on a leave application. The appeal is remitted to the appellate authority. In case, the appellate authority failed to decide the appeal within

ATTESTED


two months, without valid reason this service appeal of the appellant then be deemed to have been accepted. Parties are left to bear their own costs.

File be consigned to the record.

Sd/- Mir Bahkhat Ghani,
member
Sd/- Abdul Latif,
member

ANNOUNCE
16.09.2015

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Mir Bahkhat Ghani
Asst. Secy

Date of Filing of Appeal 1-10-2015
Amount of Appeal 1200
Date of Hearing 8
Date of Judgment 2
Date of Appeal 10
Date of Filing of Appeal 1-10-2015
Date of Filing of Appeal 1-10-2015

Annexure "H" 28

REGISTERED/ FAX



DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA PESHAWAR
NO 11 518-19 /Personnel
Dated 06 /11/2015

To,

The District Health Officer
Battagram.

Subject: **JUDGMENT OF SURIYA BIBI EX-DAI.**

Memo:

Reference your letter No. 7096 dated 28.10.2015, on the subject noted above.

Since the termination order in respect of Mr. Suriya Bibi Ex: Dai has been issued after observance of all the codal formalities as required under the E&D Rules 2011 on account of bogus/fake Dais training certificate, and absence from duty, therefore, she cannot be re-instated.

The Dai concerned may be informed accordingly.

DIRECTOR GENERAL HEALTH SERVICES, K.P.K PESHAWAR

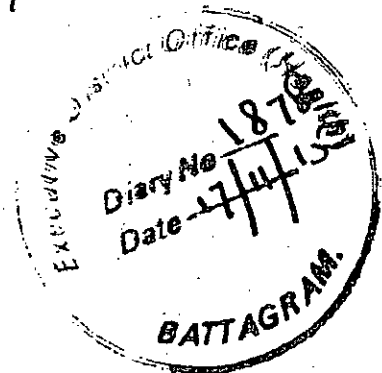
28/11/2015

C.C

Registrar Peshawar Service Tribunal Khyber Pakhtunkhwa Peshawar for information w/r his judgment in appeal No. 877/2012 announced on 16.09.2015.

*H/c,
Dai be informed,
Saeed
16/11*

*Attested
H [Signature]*



کورٹ فیس

وکالت نامہ

BEFORE THE KHIBER PUKHTUN KHAWAR ^{Semi} Tribunal

عنوان: Ms. Saniya Bibi نام Govt

منجانب: Appellent

نوعیت مقدمہ: Semi Appeal

باعت تحریر آنکہ
ABBOTTABAD and PESHAWAR
مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام

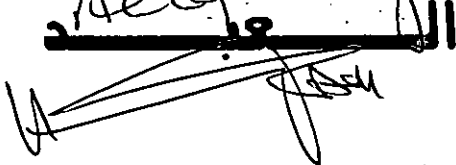
Hameem Khan Advocate High Court

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داخبتہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد استجارت نالش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم: 1/1/2015

بمقام: ABBOTTABAD

Accepted by




صاحبہ سانیہ بی بی
مشیرہ بی بی

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR
CAMP COURT ABBOTTABAD.

Appeal NO. 11/ 2016

Suriya Bibi

Appellant

VERSUS

1. Secretary Govt Of KPK Peshawar (Respondent No.1)
2. Director General Health Services Khyber Pakhtunkhwa Peshawar. (Respondent No.2)
3. District Health Officer Battagram. (Respondent No.3)

JOINT COMMENTS ON BEHALF OF RESPONDENT NO. 1 TO 3 DISTRICT HEALTH OFFICER BATTAGRAM

Respectfully Sheweth:-

Preliminary Objections:-

1. That the appellant did not come to this Service Tribunal with clean hands.
2. That the appellant has no cause of action/ locus standi to file the instant appeal.
3. That the instant appeal is hit by laches and barred by law of limitation.
4. That the appeal has been filed to pressurize the respondents.
5. That the appellant has suppressed the original fact from this honorable tribunal have not entitled for any relief and appeal is liable to be dismissed.

FACTUAL OBJECTIONS:-

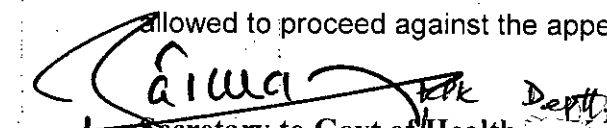
1. Incorrect the appellant was appointed as a Dai at BHU Sakargah vide this office letter No. 1556 -61 Dated 16/07/2009 after that she was posted at Civil Dispensary Phagora vide this office letter No. 1940-44 Dated 01/10/2010. During her service at CD phagora due to her personal problem and FIR against her later on Honorable Court given decision against her during the Trial she was suspended from service and after that she was transfer to RHC Kuza Banda.
2. Incorrect the appellant perform her duty off and on.
3. Incorrect hence denied infect the appellant did not produced a solid proof of her daughter operation from Rawalpindi nor she submitted her leave application forward from incharge and she left duty before sanction of her leave.
4. Incorrect and hence denied that the appellant did not submit application for leave nor she produced her daughter operation documents before inquiry officer and even not till the termination of her service.
5. Reply as in previous para of appeal relates to record.

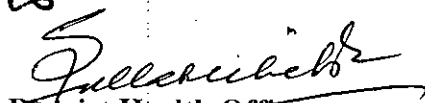
6. Correct to the extent that the appellant filed in appeal before this honorable tribunal and honorable tribunal dispose the appeal of with same direction.
7. Incorrect hence denied the copy of respondent judgment is attached.
8. Para No.8 is relates to record.
9. That in reply of Para No. 9 is humbly submitted that the judgment of honorable tribunal is dated 16/09/2015 is self explanatory in this respect.
10. Para No.10 is relates to record.
11. Incorrect hence denied infact there is no evidence that the appellant visit to Director General Health Services office Peshawar. Secondly Director General Health Services passed an office order No. 11518-19/ Personnel dated 06/11/2015 along with a copy of this Tribunal. Thirdly appellant received the copy of said letter from this office.
12. That the order passed by the authority after fulfillment of all the codal formalities hence the appeal is liable to dismissed.


GROUND.

- (a) Incorrect hence denied Termination of the appellant is according to law and rules.
- (b) Incorrect hence denied Appellant was terminated from service by adopting all codal and legal formalities.
- (c) Incorrect hence denied respondent No. 3 has not passed any order in respect of leave of the appellant.
- (d) Incorrect hence denied the appellant remained absent from service without information, she was fully given opportunities.
- (e) Incorrect hence denied both the order passed by the authority as per law and rules.
- (f) Incorrect hence denied the order passed by authority is according to the law.
- (g) Incorrect hence denied the proceeding done according by the authority according to the law and procedures as lied down in service rules.
- (h) No Comments.
- (i) Once this court given the decision on the basis of the facts cannot be altered. That the respondent will be disclosed other points at time of argument with the permission of this honorable tribunal.

It is therefore humbly prayed that on acceptance of above written statement the instant appeal may graciously be dismissed with cost and despondence may also be allowed to proceed against the appellant.

16/3/16

 Secretary to Govt of Health
 Peshawar Respondent No. 01


 District Health Officer
 Battagram
 Respondent No. 03


 Director General Health Services
 KPK Peshawar Respondent No. 02

14/3/16

BEFORE THE HONORABLE COURT KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR ABBOTTABAD BENCH.

SUBJECT:- WRIT PETITION NO.11/2016

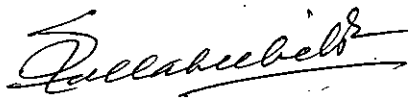
Suriya Bibi Appellant.

VERSUS.

GOVERNMENT OF KHYBER PAKHTUNKHWA Respondent.

AFFIDAVIT.

I Dr. Saifullah Khalid District Health Officer Battagram do hereby affirm and declare that the contents of para wise writ petition are true and correct as per my knowledge and available record that nothing material has been suppressed this honorable court.


RESPONDANT NO. 3

Order-10
20.02.2012

APP for the state present. Accused in person on bail along with learned counsel present. Pws Kafayat Hussain present and his statement is recorded as PW-2. Arguments on application under section 249-A Cr.P.C heard. File perused.

Perusal of record shows that accused was arrested in the present case with the allegation that he along with two unknown accused was charged by the complainant Mst. Sorya Bibi for outraging her modesty punishable under section 354/34-PPC. Hence, the present case in hand.

After the registration of case, accused was admitted to bail. On 09.06.2011, the complete challan was submitted before court and provision of 241-A CrPC were complied with on 30.06.2011; and formal charge was framed on 14/07/2011 to which the accused/petitioner pleaded not his guilt and claimed trial.

Prosecution was allowed to produce its evidence in support of its claim. Complainant got recorded her statement as PW-1 wherein she stated that she did not want to prosecute the accused/petitioner furthermore and has got no objection if the accused/petitioner is acquitted.

Kafayat Hussain, the husband and alleged eye witness examined as PW-2 stated that he has wrongly been shown the eye witness by the local police and neither he got recorded his statement before the local police nor he is the eye witness of the occurrence. He also stated that his wife had registered false case against the accused/petitioner. After the statement of complainant and alleged eye witness PW-2, the whole case of the prosecution has been made doubtful. The learned APP was not able to oppose the application of the accused/petitioner for his acquittal under section 249-A CrPC.

Civil Judge J.M.
Batalagram

P 7
Certified U/A 87 of 1984
(Q-c-s order) 1984


Examiner
District & Session Court
Batalagram

23 - 2 - 12


As sequel to these findings, I am of humble opinion that no probability of conviction of accused on the basis of available evidence. Proceeding with instant case seems to be a futile exercise. Therefore, the accused/petitioner namely Ghulam Hazrat /o Ghulam Ahmed is acquitted under section 249-A from the charges leveled against him. Sureties are discharged from their liabilities. File be consigned to Record Room after its completion and compilation.

Order announced in open court in the presence of accused.

Announced
20.02.2012


Muhammad Riaz
Judicial Magistrate-I,
Battagram

2
Certified U/A 87 of the
Q-4-s order 1984


Examiner
District & Session Court
Battagram.

23 - 02 - 12

REGISTERED/ FAX



DIRECTORATE GENERAL HEALTH
SERVICES, KHYBER PAKHTUNKHWA
PESHAWAR
NO 11518-19 /Personnel
Dated 06 /11/2015

To,

The District Health Officer
Battagram.

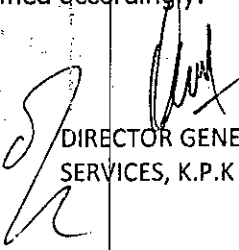
Subject: JUDGMENT OF SURAYA BIBI EX-DAI.

Memo:

Reference your letter No. 7096 dated 28.10.2015, on the subject noted above.

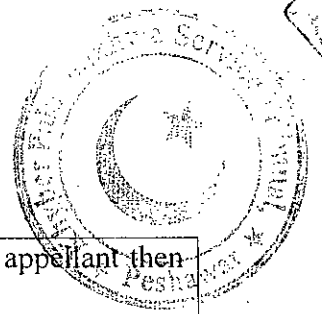
Since the termination order in respect of Mr. Surya Bibi Ex: Dai has been issued after observance of all the codal formalities as required under the E&D Rules 2011 on account of bogus/fake Dais training certificate, and absence from duty, therefore, she cannot be re-instated.

The Dai concerned may be informed accordingly.


DIRECTOR GENERAL HEALTH
SERVICES, K.P.K PESHAWAR

C.C

Registrar Peshawar Service Tribunal Khyber Pakhtunkhwa Peshawar for information w/r his judgment in appeal No. 877/2012 announced on 16.09.2015.



two months, without valid reason this service appeal of the appellant then
be deemed to have been accepted. Parties are left to bear their own costs.

File be consigned to the record.

Sd

Sd

(PIR BAKHSH SHAH)
MEMBER

(ABDUL LATIF)
MEMBER

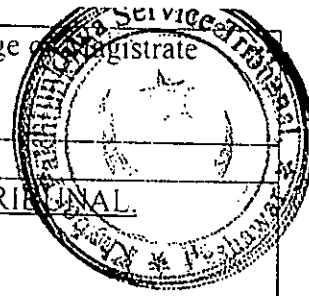
Certified to be true copy

ANNOUNCED
16.09.2015



EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.		
APPEAL NO.877/2012		
(Mst. Suriya Bibi -vs- Secretary Health, KPK, Peshawar and others).		
JUDGMENT		
PIR BAKHSH SHAH, MEMBER:		
16.09.2015	Appellant with counsel (Mr. Hamayoon Khan, Advocate) and Mr. Shah Jehan, Assistant alongwith Government Pleader (Mr. Muhammad Jan) for respondents present.	



ATTESTED

[Handwritten Signature]

EXAMINER

**Khyber Pakhtunkhwa
Service Tribunal,
Peshawar**

2. Appellant Mst. Suriya Bibi was appointed as DAI (BPS-02) vide appointment order dated 16.07.2009 issued from the office of EDO Health, Batagram. At the relevant time she was posted at RHC Kuzabanda. The Competent Authority vide his order dated 08.10.2011 on the charges of fake documents and absence from duty w.e.f 12.09.2011, terminated her from service. According to appellant, her departmental appeal dated 05.03.2012 was not responded by D.G Health Khyber Pakhtunkhwa, Peshawar, hence this service appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
3. Arguments of the learned counsels for the appellant and Learned GP heard at length and record perused with their assistance.
4. In defense of the appellant about her absence it was argued that she

was on leave dully allowed by the DHO (EDO Health) Dr. Aqeel Bāngash; therefore the charges of absence against the appellant is false. It is worth mentioning that according to the respondent-department even this leave application is bogus and self-prepared. So far the issue of fake documents is concerned plea of the appellant is that no diploma is required for the post of DAI therefore, the charge of producing fake diploma is also false. We have perused the record in which we found letter of EDO (Health) Abbottabad bearing No. 5921 dated 31.05.2011 according to which as the appellant had not attended one year training course therefore her certificate for such course was not genuine. Evidently, the issue is not about fake diploma but about fake course certificate. The record further reveals that the charges of absence were inquired into by Dr. Muhammad Arshad. In this regard learned counsel for the appellant submitted that there never was any Doctor with the said name.

ATTESTED



EXAMINER

**Khyber Pakhtunkhwa
Service Tribunal,
Peshawar**

5. After hearing learned counsel for the appellant and learned Government Pleader for the respondent-department at quite length, the Tribunal is of the considered opinion that as the departmental appeal of the appellant has not yet been decided and the controversy highlighted above is factual in nature, therefore, we would like to remit the case to the appellate authority with the direction to decide the same within a period of two months after receipt of this judgment. The appellate authority may determine as to whether such course certificate/diploma was required for the post of DAI and if required as to whether the one produced by appellant was genuine or otherwise? and Secondly also to determine as to whether the appellant remained willfully absent from duty or not as she relies on a leave application. The appeal is remitted to the appellate authority. In case, the appellate authority failed to decide the appeal within

original

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

Service Appeal No. _____/2016

Mst. Suriya Bibi

VERSUS

Govt. of KPK & others.

SERVICE APPEAL

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2.	Copy of treatment prescription	6-56	"A"
3.	Copy of application	57	"B"
4.	Copy of appeal	58-60	"C"

...RESPONDENTS

Through

Dated: 17-08/2016



(HAMAYUN KHAN)

Advocate High Court, Abbottabad

(1)

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

Service Appeal No. _____/2016

Mst. Suriya Bibi **VERSUS** Govt. of KPK & others.

SERVICE APPEAL

REJOINDER

Respectfully Sheweth;-

Brief facts of the instant rejoinder are as under;-

REPLY OF PRELIMINARY OBJECTIONS;

1. Para No. 1 of the reply is incorrect.
2. Para No. 2 of the reply is incorrect.
3. Para No. 3 is incorrect, that time run from the communication/knowledge in present appeal appellant got information of the impugned order received on 29/12/2015 and respondent intentionally malafide not deliver orders as well as actual position about order dated 06/11/2015 passed by respondent No. 2 and they did joking on

every visit when appellant went to the office of respondents and this score appellant also filed condonation of delay application if any along with appeal for caution and respondent not given any reply of the said application with their comments/reply and departmental appeal of the appellant not dismissed on the ground of limitation it means that they accepted condonation application and appeal is within time.

4. Para No. 4 is incorrect.

5. Para No. 5 is incorrect.

REPLY OF FACTUAL OBJECTION:-

1. Para No. 1 is correct to the extent appointment and transfer and rest of para is totally incorrect hence denied and para of appeal is correct.
2. Para No. 2 is incorrect appellant performed her duty with fully devotion and liability despite and para of appeal is correct.
3. Para No. 3 is incorrect that appellant performed her duty with full devotion and liability till 12/09/2011 and there after appellant preferred application before respondent No. 3 for leave which was allowed by respondent No. 3 and thereafter appellant went to Hospital in Rawalpindi for treatment of her daughter and respondent No. 3 initiated so called explanation and inquiry without any prior information/notice in absence of

appellant without any justification and respondent not annexed any documents in this regard, so all proceeding are bogus and self made. Copy of treatment prescription is annexed as annexure "A".

4. Para No. 5 of the reply is incorrect because all proceeding mentioned in para is so called without any notice, information, showcause and conducted through anonymous/ghost like doctor/inquiry officer namely Dr. Muhammad Arshid, the said name doctor not performed any duty in Health Department Battagram as medical officer as well as EPI coordinator since last 30 years, when above mention facts about so called inquiry officer came in the knowledge of appellant, appellant filed application for some documents in respect of the said doctor Inquiry Officer, i.e transfer to District Battagram, notification/order as EPI coordinator, present posting and concern pages of attendance register as EPI coordinator and respondent No. 3 did not delivered any record of the said doctor, which is clear shows that all inquiry proceeding were conducted through so called doctor. Copy of application is annexed as Annexure "B".

5. Para No. 5 of comments need no comments.
6. Par No. 6 of comments need no comments.
7. Para No. 7 of the comments is incorrect and apra of appeal is correct.
8. Para No. 8 need no comments.

9. Para No. 9 need no comments.
10. Para No. 10 need no comments.
11. Para No. 11 of the comments is incorrect hence denied and para of appeal is correct.
12. Para No. 12 of the appeal is correct because respondent No. 2 passed order without any personal hearing in absence of appellant and there after the appellant filed another appeal before respondent No. 1 and till date respondent No. 1 not passed any order on that appeal. Copy of appeal is annexed as Annexure "C".

REPLY OF GROUNDS:-

- a. Para A is incorrect hence denied all proceeding was conducted on political pressure without any show cause notice and without inquiry.
- b. Para B is incorrect inquiry was conducted through bogus doctor inquiry officer.
- c. Para C is incorrect and para of appeal is correct.
- d. Para D is incorrect and para of appeal is correct.


- e. Para E is incorrect and para of appeal is correct.
- f. Para F is incorrect and para of appeal is correct.
- g. Para G is incorrect and para of appeal is correct.
- h. Para H is incorrect and para of appeal is correct.
- i. Para I is incorrect and para of appeal is correct.

It is therefore, humbly prayed in the light of above circumstances appeal of appellant may kindly be accepted alongwith all benefits.

...RESPONDENTS

Through

Dated: 17-08 /2016



(HAMAYUN KHAN)

Advocate High Court, Abbottabad

Amex A²³

6

Armed Forces Institute of Cardiology &
National Institute of Heart Diseases
Rawalpindi
Tel: Mil GHQ - 32236
No. 1107/Account/Estimate
30 Jul 2008

To: TO WHOM IT MAY CONCERN

Subject: ESTIMATED EXPENDITURE OF OPERATION OPEN HEART SURGERY
IN RESPECT OF CNE RIDA ZAINAB

1. Approximate expenditure of operation open heart surgery (TOF) along with normal stay of the patient in the hospital will be Rs. 250,000.00 (Rupees two hundred fifty thousand only) in respect of above named patient. The detail is as under:-

a.	Hospital Charges (NHI and Patients Care Charges)	Rs.	15000.00
b.	Surgeon/Anest & Surgeon Consultation fee	Rs.	100000.00
c.	Surgery investigations charges	Rs.	65000.00
d.	Consumable Medical Items / Disposable Equipment charges	Rs.	70000.00
G. TOTAL			Rs. 250000.00

2. This estimate pertains to the particular operation mentioned above and for a stay of 14 days in the hospital. If due to medical necessities, the stay is prolonged or any additional procedure is needed, additional charges would have to be levied for treatment of the patient. Medicine will be provided by the patient himself. However, in case of non availability of medicine during emergency help will be provided.

3. The cheque /Bank draft may please be issued in favour of Comdt/Exec Dir AFIC/NIHD Rawalpindi under covering letter and deposit the same before admission.


Maj
For Comdt
(Ahmed Farid Malik)

7

3 Q-78 AFIC-F-4

AFIC-NIHD RAWALPNDI

11522

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/ROUTINE	DATE 16-9-11	TIME	LAB NO.	DATE & TIME RECEIVED
NATURE OF SPECIMEN		URINE ROUTINE EXAMINATION		
NO.	COLOUR	MICROSCOPIC EXAMINATION		
RANK <i>CNP</i>	SP GRAVITY	RBC	/HPF	
NAME <i>Rida</i>	REACTION	PUSS CELLS	/HPF	
UNIT/WARD	PROTIEN	CASTS	/HPF	
AGE <i>14</i> Sex <i>F</i>	SUGAR	BACTERIA		
Date Of Admission	BILE SALTS/PIGMENTS	OTHERS	<i>Epith cells of fecal /HPF</i>	

Clinical Notes

REMARKS

TOT

SOCIAL WELFARE DEPT
 CHE-ZARAT, BAITUL MI
 Charges *Grants*
 Sig. *[Signature]*

[Signature]
 SIGNATURE
 MO/IC

AFIC/NIHD
 PATH LAB
[Signature]
 HRL

[Signature]
 ASAD ET AL
 CLASICO
 B.C.S (HAEMATOLOGY)
 SIGNATURE
 PATHOLOGIST

AFIC-F-371

Echocardiogram
Armed Forces Institute of Cardiology
&
National Institute of Heart Diseases
Rawalpindi

6964

Phone: 861-33236
Ex: 3032

No. _____ Rank CNE Name Rida Samra Date: 30/1/12
Unit _____ Age 13 1/2 Sex F
Hospital A & D No. _____ Ward / Deptt OPD Height _____ W _____

Mitral Valve	Diastolic Closure Rate (D.C.R)	70-120 mm/sec
	Excursion of Anterior cusp	20-25 mm
Aortic Valve	Aortic Root Diameter	20-37 mm
	Excursion 16-27 mm	
	Septal Thickness at R-Wave	6-12 mm
	Post Wall Thickness - Systole	14-18 mm
	- Diastole	6-12 mm
Left Ventricle	Systolic Diameter (Ds)	25-41mm
	Diastolic Diameter (Ds)	35-56 mm
	Fractional Shortening	25-45 %
Right Ventricle	Int. Diameter	Less than 30 mm
Left Atrium	Int. Diameter (end Systole) (end Systole)	15-40 mm

- A. Doppler Studies
 - Mitral Valve
 - Area
 - M.H Grade-I, II, III & IV
 - B. Aortic Valve
 - Normal
 - A.S.
 - Pressure gradient
 - C. Aortic Regurgitation I, II, III, IV & VI
 - D. Pulmonary Valve
 - Normal
 - PVS
 - Pressure Gradient
 - E. Left Vent
 - Size : Normal / Enlarged
 - Contractility : Good/ Reduced
 - Ejection Fraction : _____
 - F. Sequential Analysis of Congenital Heart Diseases

Transoesophageal Echo

Tof
Superior (P.S)
suitable for T. echo
OPINION / DIAGNOSIS

S. Solitus
Curve normal
Normal aortic conduction
Aortic valve competence
No ASD
Bij-malaligned AV valves
& Aortic overlie
Discrete Supracardiac Pulmonary stenosis
(77-115)
well developed lungs 12-15cm

non-dilatation
low impedance
normal pulmonary valve
L valve

Colony
AFIC
National Institute of Heart Diseases
Rawalpindi

ARMED FORCES INSTITUTE OF CARDIOLOGY &
NATIONAL INSTITUTE OF HEART DISEASES
RAWALPINDI-PAKISTAN
X-RAY DEPARTMENT

35143

Date: 11.5.11

Received with thanks from Rida

in sum of Rupees One Hundred Fifty

on account of X-Ray Chest 18207-

Rs 150-

Sign _____

10
received with thanks from
a sum of Rs
on acc

X-RAY REPORT
A.F.I.C. N.I.H.D. RAWALPINDI

No. _____ Rank Capt

Name Rida Janjoo Sex F

Age 14y Unit 4 Ward OPD

1. Previous exam (date) 17/7/11 Nature of injury or disease

X Ray chest Paucy

2. Date of on set _____ Exact part of the body to be X-rayed _____

3. Brief clinical notes

T.O.F

SOCIAL WELFARE OFFICER
GENE SARHAT BAITUL MAL
Charges Full Charge
Sig. [Signature]
11-82-11

LT [Signature]
M.A.S.
Classy AFIC Rawal Pindi
MO/IC
case

AFIC-NIHD RAWALPNDI

PATHOLOGY LABORATORY REQUEST & REPORT FORM

3 R-78 AFIC-F-4
11/5/2

URGENT/ROUTINE	DATE 16-9-11	TIME	LAB NO.	DATE & TIME RECEIVED
NATURE OF SPECIMEN		URINE ROUTINE EXAMINATION		
NO.	COLOUR	MICROSCOPIC EXAMINATION		
RANK <i>MR</i>	SP GRAVITY	RBC	/HPF	
NAME <i>Rida</i>	REACTION	PUSS CELLS	/HPF	
UNIT/WARD	PROTIEN	CASTS	/HPF	
AGE <i>14</i> Sex <i>F</i>	SUGAR	BACTERIA		
Date Of Admission	BILE SALTS/PIGMENTS	OTHERS	<i>Epith cells in feces</i>	
Clinical Notes	REMARKS			

TOT

SOCIAL WELFARE OFFICER
 CHE ZAVAT, DAITUL MI
 Charges
 Sig. *[Signature]*

AFIC-NIHD
 PATH LAB
[Handwritten marks]

SIGNATURE
 MO/C

ASAD
 CLASSIFIED
 PCS (BANKING)

SIGNATURE
PATHOLOGIST

12

AFIC-NIHD RAWALPINDI

AFIL-F

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/ROUTINE	DATE 22-10-11	TIME	LAB NO	DATE & TIME RECEIVED
----------------	---------------	------	--------	----------------------

NATURE OF SPECIMEN	
--------------------	--

No	COAGULATION PROFILE		REMARKS
----	---------------------	--	---------

RANK <i>CN-6</i>	BLEEDING TIME (IVY'S METHOD)	Normal: 2-7 min	
------------------	------------------------------	-----------------	--

NAME <i>Rizwan</i>	CLOTTING TIME (Lee & White Method)	Normal: 2-11 min	
--------------------	------------------------------------	------------------	--

UNIT/WARD	PROTHROMBIN (PT) TIME	PATIENT Sec: 18.5 Control Sec: 12.0	
-----------	-----------------------	--	--

AGE <i>19</i> SEX <i>M</i>	PITTK (APTT)	PATIENT Sec: 28 Control Sec: 20	
----------------------------	--------------	------------------------------------	--

Date of Admission	PLATELET COUNT	Normal: (150-400) /mm ³	
-------------------	----------------	------------------------------------	--

Clinical Notes/Remarks	INR: International Normalized Ratio (Therapeutic Range 2-5.4)	1.29	
------------------------	---	------	--

	FDP	Normal: <10 mg/ml	
--	-----	-------------------	--

	Plasma Fibrinogen	Normal: >2.4 g/l	
--	-------------------	------------------	--

	D-Dimers	Normal: <250 mg/ml	
--	----------	--------------------	--

SIGNATURE <i>M. Asif</i>	SOCIAL SECURITY CARD	ASAD M... SIGNATURE PATHOLOG
--------------------------	----------------------	------------------------------------

SOCIAL SECURITY CARD
GENE: ZAKAT / BAITU
Gin: 1053 / Kati
SIU

270

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R

X-RAY REPORT

A.F.I.C. - N.I.H.D. RAWALPINDI

No. _____ Rank capt
Name Rida Janib Sex F
Age 14y Unit 4 Ward OPD

1. Previous exam (date) 22/11/11 Nature of injury or disease.

X Ray Chest Pain

2. Date of on set _____ Exact part of the body to be X-rayed _____

3. Brief clinical notes :

T.O.F

SOCIAL WELFARE OFFICER
CNE SARHATUL MAAL
Charges *full charges*
Sig *R*

LT. COL. INIYAM HILLARI
MBBS
CIN. INIYAM HILLARI
AFIC/IC Rawalpindi
R
MO/IC
case

LAB REPORTS/REPORT FORM

PATHOLOGY DEPARTMENT
 ARK-NIND RAVAMPINDI
 BLOOD CHEMICAL PROFILE

ATC-1405

[Handwritten notes and signatures]

111

Date: 11.12.11
 Time: 11:15 AM
 No: 111

Name: *[Handwritten Name]*
 Sex: Male/Female
 Age: *[Handwritten Age]*
 Unit/Ward: *[Handwritten Unit/Ward]*

Ref Range Analyte Result Unit

Ref	Range	Analyte	Result	Unit
52	200	CHOL ESTEROL	200	mg/dl
22	200	TRIGLYCERID	22	mg/dl
10	1.0	HDL	1.0	mmol/l
38	mg/dl	HDL	38	mg/dl
39	mmol/l	LDL	39	mmol/l
150	mg/dl	VLDL	150	mg/dl
38	mg/dl	VLDL	38	mg/dl
40	Ratio	LDL/HDL	4.0	Ratio
21-26	mmol/l	CALCIUM	21.26	mmol/l
84-104	mg/dl	CALCIUM	84.194	mg/dl
0.87-1.45	mmol/l	INORGANIC PHOSPHORUS	0.87	mmol/l
2.6-4.4	mg/dl	INORGANIC PHOSPHORUS	2.644	mg/dl
66-87	g/l	TOTAL PROTEIN	66.87	g/l
35-48	g/l	ALBUMIN	35.48	g/l
1.2-1.8	Ratio	ALT RATIO	1.218	Ratio
200-420	mmol/l	URIC ACID	200.420	mmol/l
33-70	mg/dl	URIC ACID	33.70	mg/dl
96-108	mg/dl	CHLORIDE	96.108	mg/dl

ALT 96.5
 ALP 1399
 VLDL 140

CLINICAL NOTES, REMARKS

[Handwritten notes and stamps]

1110532009
 1399

PATHOLOGIST

[Handwritten notes]

15

58

AFIC-3003

AFIC-NIHD RAWALPINDI

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/Routine: DATE: 11/12/11 TIME: 11:00 AM LAB NO: 11111111 DATE/TIME RECEIVED: 11/12/11

NATURE OF SPECIMEN: *WBC*

NO: *11111*

RANK: *1111*

NAME: *1111*

UNIT/WARD: *1111*

SEX: *1111*

Date of Admission: *11/12/11*

Clinical Notes: *1111*

BLOOD COMPLETE PICTURE

	MALE	FEMALE
RBCs $\times 10^{12}/l$	(4.5-6.5)	(3.8-5.8)
HAEMOGLOBIN (g/dl)	(130-180)	(115-165)
PCV (%)	(0.40-0.54)	(0.37-0.47)
Mcv (fl)	(78-98)	(78-98)
MCH (pg)	(27-32)	(27-32)
MCHC (g/dl)	(30-35)	(30-35)
Retenocyte count (Normal 0-2%)		

TOTAL & DIFFERENTIAL WBC COUNT

Neutrophils $\times 10^9/l$	6.0	BASOPHILS (%)	0.5
(Normal 4.0-10.0)		(Normal 0.1%)	
Eosinophils $\times 10^9/l$	5.0	LYMPHOCYTES (%)	65.0
(Normal 0.5-7.5)		(Normal 20-45%)	
Monocytes (%)	0.5	MONOCYTES (%)	9.0
(Normal 1-6%)		(Normal 2-10%)	
Platelets $\times 10^9/l$	160	PLATELETS $\times 10^9/l$	160
(Normal 150-400)		(Normal 150-400)	

RBC'S MORPHOLOGY

Polycythemia	0	Poikilocytosis	0
Polycythemia	0	Macrocytosis	0
Polychromasia	0	Polychromasia	0
Microcytosis	0	RBC Fragmentation	0
Target Cells	0	Target Cells	0
Nucleated RBC's / 100 WBC's	0	Nucleated RBC's / 100 WBC's	0

ESR in mm at the end of 1st hour (Westergren's) *0* (Normal Male 1-10 Female 3-15)

MARKS:

11/12/11

1111

SIGNATURE

PATHOLOGIST

16

7 P-37517



AFIC-NIHD RAWALPINDI

AFIC - F

PATHOLOGY LABORATORY & REPORT FORM

URGENT/ROUTINE	DATE 14/12/14	TIME 12:47	LAB NO.	DATE & TIME RECEIVED
----------------	---------------	------------	---------	----------------------

NATURE OF SPECIMEN	HbSag Anti HCV	LIPID PROFILE
--------------------	----------------	---------------

	TESTS	RESULT	DESIRED THERAPEUTIC VALUE
RANK			mg/dl 200
NAME	CHOLESTEROL		m.mol/l 3-5.2
UNIT/WARD			mg/dl 5-200
AGE 14yr	TRIGLYCERIDES		m.mol/l 55-22
SEX M			mg/dl 400-1000
Date Of Admission	TOTAL LIPITDS		m.mol/l 4-10
Clinical Notes TST	HDL		mg/dl 35-55
			mm.mol/l 0.91-143
	LDL		mg/dl <150-190
			m.mol/l <3.9-4.9
	VLDL		mg/dl 10-40
			m.mol/l 0.26-1.04
	CHO/TRIG		RATIO 0.1-2.0
	LDL/HDL		RATIO <4.0

REMARKS

SOCIAL WELFARE OFFICER
 AFIC-NIHD RAWALPINDI
 CNE ZAKAT, BAITUL MAL
 Charges. Full charges
 Sig. [Signature]

SIGNATURE
 MO/IC
 [Signature]

SIGNAT PATHOI

17

RADIOLOGY DEPARTMENT AFIC & NIHD RAWALPINDI

BRIG DR

MALIK MUHAMMAD KHALID

MBBS, MCPS (Pak)

Classified Radiologist &

Head of Department

Ph: 051-9272932 Ext 3019, 3021

Cell: 0321-5424618

LT COL DR

MUHAMMAD ATIF MIAN

MBBS, MCPS, FCPS (Pak), OJT (USA)

Classified Radiologist

Ph: 051-9274094 (051-9271002)

(Ext) 3019, 3021

Cell: 0333-4704289

Name Rida Age 14y Date 11/12/11
 EXAMINATION Chest Pa Film No 18207

Chest Pa
No lung lesion noted.
Heart size is normal.

WWW

[Signature]
 BRIGADIER
 MALIK MUHAMMAD KHALID
 MBBS, MCPS, FCPS
 CLASSIFIED SPEC IN RADIOLOGY
 & HEAD OF DEPARTMENT
 AFIC-NIHD RWP

49

PATHOLOGY DEPARTMENT
AFIC-NIHD-RAWALPINDI

AFIC 11/5/11

BLOOD CHEMICAL PROFILE

LAB REQUEST/REPORT FORM

Date: 11-5-11	Time:	Urgent	Routine
No:	Rank: CMB	Name: Rida Jamil	
Unit/Ward:	Age: 14.2	Sex: Male/Female	

Analyte	Result	Unit	Ref Range	Analyte	Result	Unit	Ref Range
CPK		U/L	Upto 190	CHOLESTEROL		mmol/L mg/dL	<5.2 <200
CK-MB		U/L	0-24	TRIGLYCERIDE		mmol/L mg/dL	<2.2 <200
LDH		U/L	240-480	HDL		mmol/L mg/dL	<1.0 <38
GLUCOSE FASTING		mmol/L mg/dL	3.3-6.1 60-110	LDL		mmol/L mg/dL	<3.9 <150
GLUCOSE 2h ABF		mmol/L mg/dL	3.3-7.8 60-140	VLDL		mmol/L mg/dL	<1.0 <38
GLUCOSE RANDOM		mmol/L mg/dL	3.3-11.1 60-200	LDL/HDL		Ratio	<4.0
UREA	2.4	mmol/L mg/dL	1.7-8.3 10-50	CALCIUM		mmol/L mg/dL	2.1-2.6 8.4-10.4
CREATININE	0.6	umol/L mg/dL	62-106 0.7-1.19	INORGANIC PHOSPHORUS		mmol/L mg/dL	0.87-1.45 2.6-4.4
SODIUM	140	mmol/L	135-145	TOTAL PROTEIN		g/L	66-87
POTASSIUM	3.9	mmol/L	3.2-5.2	ALBUMIN		g/L	35-48
TOTAL BILIRUBIN	14.0	umol/L mg/dL	3.4-17.1 0.2-1.0	AG RATIO		Ratio	1.2-1.8
DIRECT BILIRUBIN		umol/L mg/dL	<5.1 <0.29	URIC ACID		mmol/L mg/dL	200-420 3.3-7.0
INDIRECT BILIRUBIN		umol/L	<11.9 <0.69	CHLORIDE		MEq/L	96-108
ALP	96.5	U/L Adult U/L Children	65-306 Upto 645				
ALT	16	U/L	Upto 41				

CLINICAL NOTES/REMARKS

SOCIAL WELFARE OFFICER
CNS ZAKARI
11-5-11

LI COL
ASAD MAHMOOD ABBASI
CLASSIFIED PATHOLOGIST
F.C.P. MALIATU QADRI

PATHOLOGIST

MOVC
1399
1110502009

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Mar k @ c n
Family count
Marriage
7/7/14

u.d.l

20

0-2
25-2015

AFIC-F-3003
11/5

AFIC-NIHD RAWALPINDI

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/ROUTINE | DATE 22-12-11 | TIME | LAB NO. | DATE & TIME RECEIVED

NATURE OF SPECIMEN *Platlets + ESR* BLOOD COMPLETE PICTURE + *ESR*

		MALE	FEMALE
NO. OF RBC'S	9.13 X10 ¹² /l	(4.5-6.5)	(3.8-5.8)
HAEMOGLOBIN	17.4 g/dl	(13.0-18.0)	(11.5-16.5)
PCV	62 %	(0.40-0.54)	(0.37-0.47)
MCV		(78-96)	
MCH		(27-32)	
MCHC		(30-35)	
Reticulocyte Count (Normal: 0.2-2%)			

Age 74 | SEX M | Rank *Capt* | Name *Rida* | Unit/Ward | Date of Admission | Clinical Notes

TOTAL & DIFFERENTIAL WBC COUNT

Neutrophils	60 %	(Normal 40-75%)	
Lymphocytes	30 %	(Normal 20-45%)	
Monocytes	02 %	(Normal 2-10%)	
Eosinophils			
Basophils		(Normal <01%)	
Platelets	169 X10 ⁹ /l	(Normal 150-400 X10 ⁹ /l)	

Mrs Farhat Zai Mifti
JUDGE Family Court
Haripur

RBC'S MORPHOLOGY

Poikilocytosis	
Macrocytosis	
Polychromasia	
RBC Fragmentation	
Target Cells	
Nucleated RBC's/100 WBC's	
ESR in mm at the end of 1st hour (Westergens)	0.4 (Normal Male 1-10 Female 3-15)

MARKS:

WBC + ESR

SOCIAL WELFARE OFFICER
CHIEF EXECUTIVE OFFICER
Signature
Sig

DR. MAHMOOD AKBAR
CLASSIFIED PATHOLOGIST
FCPS (HAEMATOLOGY) AFIC-NIHD
SIGNATURE
PATHOLOGIST

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0.0.67

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AFIC-NIHD RAWALPINDI
PATHOLOGY LABORATORY & REPORT FORM

AFIC - F - 406

7 1-37317
N.S. 2013

URGENT/ROUTINE	DATE 20/10	TIME	LAB NO.	DATE & TIME RECEIVED
NATURE OF SPECIMEN		HOSPITAL AND HC V LIPID PROFILE		
RANK	TESTS	RESULT	DESIRED THERAPEUTIC VALUES	
NAME	CHOLESTEROL		mg/dl	200
UNIT/WARD			m.mol/l	3.5.2
AGE 14 SEX F	TRIGLYCERIDES		mg/dl	5-200
Date Of Admission			m.mol/l	55-22
Clinical Notes Tof	TOTAL LIPIDS		mg/dl	400-1000
			m.mol/l	4-10
	HDL		m.mol/l	35-55
			mg/dl	0.91-143
	LDL		mg/dl	<150-190
			m.mol/l	<3.9-4.9
	VLDL		mg/dl	10-40
		m.mol/l	0.26-1.04	
	CHO/TRIG		RATIO	0.1-2.0
	LDL/HDL		RATIO	<4.0

W

SIGNATURE
MOIC

SOCIAL WELFARE OFFICER
ONE ZAKAT SAHUL HIND
Charges. Full charges
Sig.

Miss Farhat Zia Mifti
Judge Family Court
Haripur

SIGNATURE
PATHOLOGIST

O.D.P.

201

X-RAY REPORT
A.F.I.C. - N.I.H.D. RAWALPINDI

No. _____ Rank CO-15

Name Rida Jan 15 Sex F

Age 14y Unit 4 Ward AD

1. Previous exam (date) 1.10.11 Nature of injury or disease.

073
2.5.2012

X Ray chest R/w

of - 3
Miss Farah Zia Magsi
Family Court
6.11.11

2. Date of on set _____ Exact part of the body to be X-rayed _____

3. Brief clinical notes :

T.O.F

SOCIAL WELFARE OFFICER
CHIEF SOCIAL WELFARE OFFICER
Charges full charges
Sig. [Signature]
11-5-09

LT. COL. IMRAN HILLI
MBBS
Class. A.F.I.C. - N.I.H.D. Rawalpindi
MO/IC
case

23

3 0-78

AFIC-F-402

AFIC-NIHD RAWALPNDI

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/ROUTINE	DATE <u>20-10-78</u>	TIME	LAB NO.	DATE & TIME RECEIVED
NATURE OF SPECIMEN	URINE ROUTINE EXAMINATION			
NO.	COLOUR <u>Pale Yellow</u>	MICROSCOPIC EXAMINATION		
RANK <u>CAF</u>	SP GRAVITY <u>1.016</u>	RBC	- /HPF	
NAME <u>Rida</u>	REACTION <u>Acidic</u>	PUSS CELLS <u>WBC 02-03</u>	/HPF	
UNIT/WARD	PROTIEN <u>NIL</u>	CASTS	- /HPF	
AGE <u>14</u> Sex <u>F</u>	SUGAR <u>NIL</u>	BACTERIA	-	
Date Of Admission	BILE SALTS/PIGMENTS	OTHERS <u>Epith Cells a few /HPF</u>		

9/10/78
20/10/78

Clinical Notes

REMARKS

TOP

CHE ZAKAT KHITULAH
Charges Qatss
Sig

SIGNATURE
MO/IC

AFIC-NIHD
PATH LAB
11/5/78

Mrs. Farhat Zia Mughl
Judge Family Court
Rawalpur

ASST. CLASS. CLERK
PCFS (HAEN)

SIG P/

0.01

24

AFIC-NIHD RAWALPINDI

AFIL-F-404

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/ROUTINE DATE 27-12-11 TIME LAB NO. DATE & TIME RECEIVED

NATURE OF SPECIMEN

COAGULATION PROFILE

NO

RANK *CMK*

BLEEDING TIME (IVY'S METHOD) Normal: 2-7 min

REMARKS

NAME *Rida*

CLOTTING TIME (Lee & White Method) Normal: 2-11 min

UNIT/WARD

AGE *14y* SEX *F*

PROTHROMBIN (PT) PATIENT Sec. *13.9*
Control Sec. *11.0*

Date Of Admission

PTTK (APTT) PATIENT Sec. *29*
Control Sec. *26*

Clinical Notes/Remarks

PLATELET COUNT Normal: *9/1*
(133-400) 10

TOT

INR: International Normalized Ratio: *1.29*
(Therapeutic Range 2.5-4.0)

FDP Normal <10mg/ml

Plasma Fibrinogen Normal: <2.4 g/l

D-Dimers Normal: <250 mg/ml

SIGNATURE *MOVO*

Dr. (S) Inamullah

CHIEF ZAKAT/PAITHA Chargesy

SIGNATURE PATHOLOGIST

67
5/12/11
10/12/11

0.415

20/9/11
 11-9-11
 Dr. Ghafoor

PATHOLOGY DEPARTMENT
 AFIC-NIHD RAWALPINDI

11-7-11
 AFIC File

BLOOD CHEMICAL PROFILE

LAB REQUEST/REPORT FORM

Date: 11-9-11 Time: _____
 No: _____ Rank: C.M.C. Urgent: _____ Routine: _____
 Unit/Ward: _____ Age: 14y Name: Rida Jamil Sex: Male/Female

Analyte	Result	Unit	Ref Range	Analyte	Result	Unit	Ref Range
CPK		U/L	Upto 190	CHOLESTEROL	0	mmol/L	3.5-2.5
CK-MB		U/L	0-24	TRIGLYCERIDE		mmol/L	<200
LDH		U/L	240-480	HDL		mmol/L	<1.0
GLUCOSE FASTING		mmol/L	3.3-6.1	LDL		mmol/L	<3.9
GLUCOSE 2H ABF		mmol/L	3.3-7.8	VLDL		mmol/L	<1.0
GLUCOSE RANDOM		mmol/L	60-140	LDL IDL		Ratio	<38
UREA	24	mmol/L	1.7-8.3	CALCIUM		mmol/L	2.1-2.6
CREATININE	0.6	umol/L	10-50	INORGANIC PHOSPHORUS		mmol/L	0.87-1.45
SODIUM	140	mmol/L	62-106	TOTAL PROTEIN		g/L	2.6-4.4
POTASSIUM	3.9	mmol/L	0.7-1.19	ALBUMIN		g/L	66-87
TOTAL BILIRUBIN	14.2	umol/L	3.4-17.1	AG RATIO		Ratio	35-48
DIRECT BILIRUBIN		umol/L	0.2-1.0	URIC ACID		mmol/L	1.2-1.8
INDIRECT BILIRUBIN		umol/L	<5.1	CHLORIDE		MEq/L	200-420
ALP	965	U/L Adult	<0.29				333-700
AET	1.6	U/L Children	<0.69				96-108
		U/L	Upto 41				

CLINICAL NOTES/REMARKS:

1399
 1110502009

SOCIAL WELFARE OFFICER
 CHE. ZAKI
 CH. J. S. S. S.

LI Coll.
 ASAD H. M. D. O. O. A. B. S. S. I.
 CLASIFIC. V. I. N. O. L. O. G. I. S. T.
 P. P. H. W. S. A. T. O. R. Y. D. E. P. T.

PATHOLOGIST

17

11.0.11

27

PATHOLOGICAL LABORATORY

ARMED FORCES INSTITUTE OF CARDIOLOGY

THE MALL ROAD, RAWALPINDI.

Tel:

No. 27438

Date 30/12/11

Received with thanks from Ridda Zainab

the sum of Rupees 750/- only

on account of GPRHE + CP

Rs.

300/5

0-7
2.5.2012

45

29

Signature

Miss Sajid Zia Akhbar
Judge Family Court
Haripur

[Handwritten Signature]

ARMED FORCES INSTITUTE OF CARDIOLOGY &
NATIONAL INSTITUTE OF HEART DISEASES

THE MALL, RAWALPINDI. Ph : 561-31114, 34566, 9271002 Ext: 3125

CASH RECEIPT

Ser. No. 0369

Patient's Registration No.

Date 07/12/11

Name of Patient: CASE RIDA ZAHEDI

Name of Specialist: COL MAAD ULLAH

Received with Thanks a sum of Rs. 15900/-

(In words): Fifteen Thousand and nine hundred only.

As per following details:

a. Cath lab (Procedure fee) Rs. 10000/-

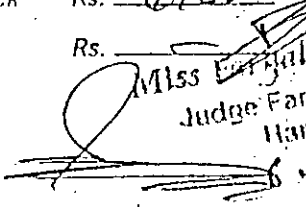
b. Bn Pack Rs. 5900-00

c. Detention charges Rs. 1000/-

d. ECG Rs. _____

e. Misc charges Rs. _____

Cashiers Name cell. M. Ayub

Signature 

Miss Farhat Zia Mishti
Judge Family Court
Haripur

~~30~~

30

4

Judicial

(2)

Tel:

PATHOLOGICAL LABORATORY
ARMED FORCES INSTITUTE OF CARDIOLOGY
THE MALL ROAD, RAWALPINDI.

gms

No. **27438**

Date: 30/9/2011

Received with thanks from Ridda zainab

the sum of Rupees Three 11/- only

on account of GPRAE + CP

Rs. 300/-

Signature [Signature]

30

ARMED FORCES INSTITUTE OF CARDIOLOGY
&
NATIONAL INSTITUTE OF HEART DISEASES
RAWALPINDI
ELETROCARDIOGRAM

22/2/12

1510

Date 22/2/12

Received with thanks from CN2 Rida Zangab

the sum of Rupees ONE HUNDRED FIFTY

in account of ECG charges

Rs 150/-


Signature

255
Dr. Lt Col Khurram Akhtar

MBBS, DCH (AFPGMI), MCPS (Peds),
FCPS (Pediatric Medicine),
FCPS (Pediatric Cardiology)
Classified Children Medical Specialist &
Pediatric Cardiologist



Department of Pediatric Cardiology
Armed Forces Institute of Cardiology &
National Institute of Heart Diseases
The Mall, Peshawar Road, Rawalpindi. Ph: 51-9274096

15
ڈاکٹر
لیفٹننٹ کرنل خرم اختر

ایم بی بی ایس، ڈی سی ایچ (ایف۔ پی۔ سی۔ ایم۔ آئی)، ایم سی پی ایس (پیڈز)
ایف سی پی ایس (پیڈز میڈیسن)، ایف سی پی ایس (پیڈز کارڈیالوجی)
کاسٹیفائیڈ چلڈرن سپیشلسٹ اینڈ پیڈز کارڈیالوجسٹ

ڈیپارٹمنٹ آف پیڈز کارڈیالوجی
قومی و فوجی ادارہ امراض قلب (دی مال، پشاور روڈ، راولپنڈی)
فون: 051-9274096

Rida Zanib

B. & M. D. O. I. O.

TOF

Post op

H/O

1 ECG
2 EATB 90°

patient had a
seizure history 5-7 min
h/o intracranial abscess
operated 2 years ago -
please show to Lt Col Tanq.
CI Neurologist Dr. H. Raza

Jade
LT COL
KHURRAM AKHTAR
MBBS, MCPS, FCPS (PAEDS)
FCPS (PAED CARDIOLOGY)
AFIC / NIHD RAWALPINDI
22-2-12

32



Care Clinical Laboratory

Opp. Madni Masjid, Near Christian Hospital, Faisal Shaheed Road, Taxila.
Cell: 0311-5157515 Cell: 0300-5494948

08:00 a.m.
To
10:00 p.m.

کینراور کوالٹی ساتھ ساتھ

FINAL REPORT

Patient Name: Rida Zainab Age/Gender: 17y/F
 Lab. No: Gc-3601 Ref. No: Nil
 Specimen Date: October 7 2012 Phone No: Nil
 Referred By: Dr. Asghar Mehmood


①

BIOCHEMISTRY

<u>TEST NAME</u>	<u>RESULT</u>	<u>NORMAL RANGE</u>
<u>Electrolytes:</u>		
Sodium	140 mmol/l	135-145
Potassium	3.5 mmol/l	3.5-5.3
Chlorides	102 mmol/l	90-110

Note: Results are generated on State of the Art EasyLite (Na/K/Cl Analyzer) by Medica.

New Test Information: Renal Function Tests are now available in Care Clinical Laboratory on daily basis.


Muhammad Adnan
 M.Sc. Biochemistry (PMAS AAUR)
 M.B.Sc. MLT (PU), DMT (NIH/WHO)

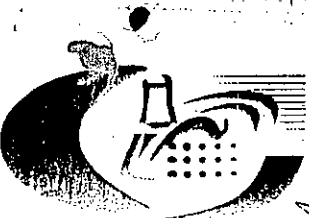
M.A. Faiz
 DMT, B.Sc. MLT
 Medical Technologist

Dr. Shakil Ahm
 MBBS, MCPS, M.F
 Consultant Pathologist

IF YOU HAVE ANY QUERY PLEASE FEEL FREE TO CONTACT US.

M.S.
3.St

33



Care Clinical Laboratory

Opp. Madni Masjid, Near Christian Hospital, Faisal Shaheed Road, Taxila.

Cell: 0311-5157515 Cell: 0300-5494948



کینراور کو الٹی ساتھ ساتھ

FINAL REPORT

(NOT FOR COURTYUSE)

Patient Name: Rida Zainab Age/Gender: 17y/F
 Lab. No: Gc-3601 Ref. No: Nil
 Specimen Date: October 7 2012 Phone No: Nil
 Referred By: Dr. Asghar Mehmood.

2

BIOCHEMISTRY

<u>TEST NAME</u>	<u>RESULT</u>	<u>NORMAL RANGE</u>
<u>Liver Function Tests:</u>		
Total Bilirubin	0.4 mg/dl	0.2-1.0 (Adult) < 12.0 (Neonate)
SGPT (ALT)	25 U/L	9-40
Alkaline Phosphatase	165 U/L	65-306 (Adult) < 705 (Children)

New Test Information: HBsAg and Anti-HCV by ELISA method are now available in Care clinical laboratory on daily basis.

Muhammad Adnan
 Sc. Biochemistry (PMAS AAUR)
 ic. MLT (PU), DMT (NIH/WHO)

M.A. Faiz
 DMT, B.Sc. MLT,
 Medical Technologist

Dr. Shakil Ahmed
 MBBS, MCPS, M.Phil
 Consultant Pathologist

IF YOU HAVE ANY QUERY PLEASE FEEL FREE TO CONTACT US.

34



Care Clinical Laboratory

Opp. Madni Masjid, Near Christian Hospital, Faisal Shaheed Road, Taxila.

Cell: 0311-5157515 Cell: 0300-5494948

08:00 a.m.
To
10:00 p.m.

کینراور کو الٹی ساتھ ساتھ

FINAL REPORT

Patient Name: Rida Zainab Age/Gender: 17y/F
 Lab. No: Gc-3601 Ref. No: Nil
 Specimen Date: October 7, 2012 Phone No: Nil
 Referred By: Dr. Asghar Mehmood

3

HAEMATOLOGY

TEST NAME	RESULT	NORMAL RANGE
Blood Complete Picture (Adult):		
WBC Count	8000 /cmm	4000-10,000
RBC Count	4.30 mil/cmm	4.5-6.0 (Male) 3.8-5.8 (Female)
Haemoglobin	13.0 g/dl	14.0-18.0 (Male) 12.0-16.0 (Female)
Haematocrit	41 %	40-50
MCV	86 fl	82-98
MCH	28 pg/dl	27-31
MCHC	32 g/dl	32-36
RDW-CV	14 %	11-16
Platelet Count	230,000 /cmm	140,000-425,000

Differential Count:

Neutrophils	60 %	55-70
Lymphocytes	36 %	25-40
Monocytes	02 %	02-06
Eosinophils	02 %	00-04
Basophils	00 %	00-01
Bands	00 %	00-01

Note: Results are generated on State of the Art Medonic CA 620 (Haematology Analyzer) by Merck Diagnostic Germany.

Muhammad Adnan
 Sc. Biochemistry (PMAS AAUR)
 Sc. MLT (PU), DMT (NIH/WHO)

M.A. Faiz
 DMT, B.Sc. MLT
 Medical Technologist

Dr. Shakil Ahmed
 MBBS, MCPS, M.Phil
 Consultant Pathologist

IF YOU HAVE ANY QUERY PLEASE FEEL FREE TO CONTACT US.

35 3 9-78

AFIC-NIHD RAWALPNDI

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/ROUTINE	DATE 9-2-11	TIME	LAB NO.	DATE & TIME RECEIVED
NATURE OF SPECIMEN		URINE ROUTINE EXAMINATION		
NO.	COLOUR	MICROSCOPIC EXAMINATION		
RANK	SP GRAVITY	RBC	— /HI	
NAME Rida	REACTION	PUSS CELLS	WBS 02 - 03 /H	
UNIT/WARD	PROTIEN	CASTS	— /H	
AGE 14 Sex F	SUGAR	BACTERIA	—	
Date Of Admission	BILE SALTS/PIGMENTS	OTHERS	Epith. cells of	

Clinical Notes

REMARKS

TOT

SOCIETY OF MEDICAL OFFICERS
 CHE. JAKAT. BAITUL MUHAMMADIYAH
 Charges **Grants**
 Sig **h**

AFIC-NIHD
 PATH LAB
452
11/5/12

SIGNATURE
MO/C

ASAD MAJID
 CLASSIFIED
 P.C.P.S (HAEMATOLOGY)

SIG
PI

AFIC-NIHD RAWALPINDI

PATHOLOGY LABORATORY REQUEST & REPORT FORM

URGENT/ROUTINE DATE 10-10-11 TIME LAB NO DATE & TIME RECEIVED

NATURE OF SPECIMEN		✓			REMARKS
NO		COAGULATION PROFILE			
RANK <u>CNK</u>	BLEEDING TIME (IVY'S METHOD)	Normal: 2-7 min			
NAME <u>Rida</u>	CLOTTING TIME (Lee & White Method)	Normal: 2-11 min			
UNIT/WARD	PROTHROMBIN (PT) TIME	PATIENT Sec	Control Sec	<u>12.8</u> <u>11.0</u>	
AGE <u>14y</u> SEX <u>F</u>	PTTK (APTT)	PATIENT Sec	Control Sec	<u>28</u> <u>20</u>	
Date Of Admission	PLATELET COUNT	Normal: (150-400) /mm ³		<u>9.1</u>	
Clinical Notes/Remarks <u>TST</u>	INR: International Normalized Ratio (Therapeutic Range 2.5-4.0)			<u>2.9</u>	
	FDP Normal: <10mg/ml				
	Plasma Fibrinogen Normal: <2.4g/l				
	D-Dimers Normal: <250 mg/ml				

SIGNATURE
MOIC/ 1783
1115

Dr. CSI Inamullah

SOCIAL WELFARE
CHE ZAKAT BANK
Charles
511

SAD M H
SIGNATURE
PATHOLOGIC

37

Care Clinical Laboratory

Opp. Madni Masjid, Near Christian Hospital, Faisal Shaheed Road, Taxila.

Ph: 051-4544642 Cell: 0300-5494948



کیئر اور کوالٹی ساتھ ساتھ

FINAL REPORT

NOT FOR COURT USE

Patient Name: Rida Zainab Age/Gender: 17y/F
 Lab. No: Gc-2423 Ref. No: Nil
 Specimen Date: August 11, 2012. Phone No: Nil
 Referred By: Dr. Asghar Mehmood

BIOCHEMISTRY

<u>TEST NAME</u>	<u>RESULT</u>	<u>NORMAL RANGE</u>
<u>Electrolytes:</u>		
Sodium	140 mmol/l	135-145
Potassium	4.3 mmol/l	3.5-5.3
Chlorides	101 mmol/l	90-110

Note: Results are generated on State of the Art EasyLite (Na/K/Cl Analyzer) by Medica.

New Test Information: Renal Function Tests are now available in Care Diagnostic Centre on daily basis.

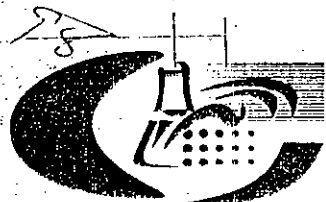
Muhammad Adnan
 Biochemistry (PMAS AAUR)
 MLT (PU), DMT (NIH/WHO)

M. A. Faiz
 DMT, B.Sc. MLT
 Medical Technologist

Dr. Shakil Ahmed
 MBBS, MCPS, M.PHII
 Consultant Pathologist

IF YOU HAVE ANY QUERY PLEASE FEEL FREE TO CONTACT US.

38



Care Clinical Laboratory

Opp. Madni Masjid, Near Christian Hospital, Faisal Shaheed Road, Taxila.

Ph: 051-4544642 Cell: 0300-5494948



کینراور کو الٹی ساتھ ساتھ

FINAL REPORT

NOT FOR COURT USE

Patient Name: Rida Zainab Age/Gender: 17y/F
 Lab. No: Gc-2423 Ref. No: Nil
 Specimen Date: August 11, 2012. Phone No: Nil
 Referred By: Dr. Asghar Mehmood

BIOCHEMISTRY

TEST NAME	RESULT	NORMAL RANGE
-----------	--------	--------------

Liver Function Tests:

Total Bilirubin	0.4 mg/dl	0.2-1.0 (Adult) < 12.0 (Neonate)
-----------------	-----------	-------------------------------------

SGPT (ALT)	21 U/L	9-40
------------	--------	------

Alkaline Phosphatase	195 U/L	65-306 (Adult) < 705 (Children)
----------------------	---------	------------------------------------

Urea	17 mg/dl	10-50
------	----------	-------

Creatinine	0.4 mg/dl	0.4-1.3
------------	-----------	---------

Note: Results are generated on State of the Art Microlab 300 (Chemistry Analyzer) by Merck Diagnostic Germany.

New Test Information: HBsAg and Anti-HCV by ELISA method are now available in Care clinical laboratory on daily basis.

Muhammad Adnan
 M.Sc. Biochemistry (PMAS AAUR)
 B.Sc. MLT (PU), DMT (NIH/WHO)

M. A. Faiz
 DMT, B.Sc. MLT
 Medical Technologist

Dr. Shakil Ahmed
 MBBS, MCPS, M.Phil
 Consultant Pathologist

IF YOU HAVE ANY QUERY PLEASE FEEL FREE TO CONTACT US.

Doctor

Syed Asghar Mehmood

M.B.B.S., RMP

Ex. Med. Officer POF Hospital, Wah Cantt.



ڈاکٹر سید اسرار محمود

ایم بی بی ایس - آر ایم پی

ایکس میڈیکل آفیسر پی او ایف ہسپتال واہ کینٹ

Date: 1-10-11

Patient's Name: Rida Jamat

Age

(NOT VALID FOR COURT OF LAW)

h
 1-10-11
 Epilepsy
 7ab Epival 500
 1/2 TADAP
 1/2 AIA
 1/2 KOP
 1/2 Polykhan fke
 1/2 ...
 1/2 ...

صبح	دوپہر	شام	رات

AL-IMRAN HOSPITAL

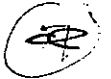
Khan Pur Road, Tofkian
0312-5152673 - 0314-5811380

ATTESTED

ال عمران ہسپتال

0512

40



Doctor

Syed Asghar Mehmood

M.B.B.S., RMP

Medical Officer POF Hospital, Wah Cantt.



ڈاکٹر سید اسرار محمود

ایم بی بی ایس آر ایم پی

ایکس میڈیکل آفیسر پی او ایف ہسپتال واہ کینٹ

Date: 20-10-11

Patient's Name: Rida Zaid

Age

(NOT VALID FOR COURT OF LAW)

Temp. Afebrile

Known case of epilepsy

EEG is normal
ECS not conducted

Tab Epival 500mg
R & N x 200

Tab Valproic acid
x 200 / 1 month

[Signature]

صبح

دوپہر

شام

رات

ATTESTED

05-12

AL-IMRAN HOSPITAL

Khan Pur Road, Tofkian
0312-5152673 - 0314-5811380

ال عمران ہسپتال

Doctor
Syed Asghar Mehmood
 M.B.B.S., RMP
 Medical Officer POF Hospital, Wah Cantt.



ڈاکٹر سید اسرار محمود

نیم بی بی ایس۔ آراین پی

انکس میڈیکل آفیسر پی او ایف ہسپتال واہ کینٹ

Date: 21-11-11

Patient's Name: Riba Zauab

Age: _____

(NOT VALID FOR COURT OF LAW)

	صبح	دوپہر	شام	رات
Keupn A/c				
of table				
Δ Epi Lepsy				
1/2 Feb Epinal sound	1	-	1	
1/2 Feb Epinal sound	1	-	1	
1/2 Feb Epinal sound	1	-	1	
1/2 Feb Epinal sound	1	-	1	

05-12

AL-IMRAN HOSPITAL

Khan Pur Road, Tofkian
 0312-5152673 - 0314-5811380

ال عمران ہسپتال

ATTESTED

Syed Asghar Mehmood
M.B.B.S., RMP
Medical Officer PGI Hospital, Wah Cantt.



ڈاکٹر سید اسرار محمد
مہربانی ایس۔ آر ایم پی
سینئر میڈیکل آفیسر پی او ایف ہسپتال واہ کینٹ

Date: 05-12-11

Patient's Name: Rida Javed Age: _____

(NOT VALID FOR COURT OF LAW)

	صبح	دوپہر	شام	رات
<p>Group 2nd of grade Epilepsy LFTL WNL area (normal) WNL</p>				
<p>tab. Epival 500mg x 20</p>	1	-	1	
<p>tab. Refral 200mg x 20</p>	1	-	-	
<p>tab. Thal' 250mg x 20</p>				
<p>Cap Omega 200</p>				

05-12

AL-IMRAN HOSPITAL

Khan Pur Road, Tofkian
0312-5152673 - 0314-5811380

ال عمران ہسپتال

ATTESTED

43



Dr. Asghar Mehmood
M.B.B.S., RMP
Medical Officer FOR Hospital, Wah Cantt.



ڈاکٹر سید اسرار محمود

ایم بی بی ایس - آرا ایم پی
ایکس میڈیکل آفیسر پی او ایف ہسپتال داد کینٹ

Date: 26-12-11

Patient's Name: Rida Nawab

Age: _____

(NOT VALID FOR COURT OF LAW)

	صبح	دوپہر	شام	رات
<p>میں نے اس کے ساتھ</p> <p>اور اس کے</p> <p>Condition Improved</p> <p>↳ Epilepsy</p> <p>↳ 2ab Epinal 500mg</p> <p>↳ 2ab Refal 100mg</p> <p>↳ 2ab (bet) 100mg</p> <p>↳ 2ab - 4FTG</p> <p>↳ 4ab (medic)</p>	1	-	1	-

AL-IMRAN HOSPITAL

Khan Pur Road, Tofkian
0312-5152673 - 0314-5811380

ال عمران ہسپتال

1171

ATTESTED

44

PAFM-1319

X-RAY DEPT

FS
4/6

C.M.H. CNE

1. No. Rank and Name D/O Kifayat

2. Age 15/8 3. Unit Cash 4. Ward FS

5. Previous Exam (Date) _____ nature of Injury or disease: _____

~~6668~~
23/12

6. Date of on set _____ Exact part of the body to be X rayed _____

7. Brief clinical report. U/S Brain

no brain
abscess

Date 23/12/12

[Signature]
M.O. I/C Case

ATTESTED


USG Brain

Due to hair on scalp, the access to brain is poor

Skull is hyperechoic area measuring 0.8 cm in diameter is seen just below the (right) BWH hole.

Surrounding edema is also noted

please share off the side for better visualization & localization


 میجر ڈاکٹر
 رانا محمد اجمیل
 کانسٹیبل سونو لوجسٹ آرینڈر ریڈیا لوجسٹ
 پی او ایف ہسپتال واہ

46

DISCHARGE SLIP AND FOLLOW UP PROFORMA

NAME OF PATIENT KARAT HUSSAIN PL. No. RANK C.A
FACTORY GROUP CASH AGE 16 YRS SEX M DATE 11.12
DISEASE Brain Abscess SPECIALIST INCHARGE

29.12.11

HISTORY HC of T.O.F.

clb realized fits for both the low
epileptic, both sides facial palsy.
No Hx of vomiting, No Hx of head
MRI / Echo done in APIC

INVESTIGATIONS MRI - Shows large hypodense lesion
in RT parietal region
Blooded WBC's $\rightarrow 9.77 \times 10^3 / \mu l$
Hb $\rightarrow 16.8 \text{ gm / dl}$

16-12-11 \rightarrow Drainage for RT
parietal Abscess done

EXAMINATION/FINDINGS

Rx at Hospital
- My - Naph - 500mg - TDS
- My - Rocapha - 250 - OD
P-FU - My - Valin - 500

ATTESTED



- 1/2 Gewinde - 85
- 1/2 - 2er - 1/2
- 1/2 - 2er - 1/2 - 1/2

R. 2/2

~~1/2~~ 1/2 - 2er

1/2

1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2



48

7

R. MASOOD MUKHTAR
MBBS, FCPS (General Surgery)
FCPS (Neuro Surgery), PGT (UK)
Consultant Neuro Surgeon
POF Hospital, Wah Cantt.



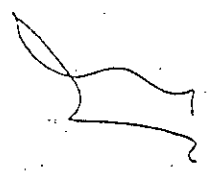
Clinic:
UMER HOSPITAL
Minar Road, Lala Rukh,
Wah Cantt. Tel. 051-4511596

Dated 3/8/10

Patient's Name _____ Age 16y Sex F 14

For CT scan done
without contrast if need
be the of contrast

Dr. Epinal
Surg / 02/10/10



18/9/10

Dr. Epinal
Surg / 06/10/10



ATTESTED

DR. MASOOD MUKHTAR
MBBS, FCPS (General Surgery)
FCPS (Neuro Surgery), PGT (UK)
Consultant Neuro Surgeon
POF Hospital, Wah Cantt.



UMER HOSPITAL
Minar Road, Lala Rukh,
Wah Cantt. Tel. 051-4511596

49

Dated 2/4/09

Patient's Name _____ Age _____ Sex F 15

Brain ab

2

Subst 2
Cerebellum

3rd ventricle
Cerebellum

OK

Dr. Masood Mukhtar

ATTESTED

Umer Hospital Wah Cantt.

50

16 9



UMER HOSPITAL
Minar Road, Lala Rukh,
Wah Cantt. Tel. 051-4511596

MASOOD MUKHTAR
MBBS, FCPS (General Surgery)
FCPS (Neuro Surgery), PGT (UK)
Consultant Neuro Surgeon,
POF Hospital, Wah Cantt.

Dated 9/1/09

Patient's Name د. د. زینب Age 144 Sex F

Pallo
Tehroly.

brod abou (op)

CT

AV

CT upatiki

AV

TO have CT sea

brod without A with

cuter eubid

د. ماسود مڪھٽار

ATTESTED



CITY HOSPITAL

A-23/1-, Quaid Avenue, Near Akhri Stop, Wah Cantt.
Ph: 051-4540425, 051-4539242, Fax: 051-4540418

51 16

(17)

Discharge Notes

Patient Name: Rida Zainab Date of Admission: 01-02-09

Diagnosis: Brain abscess Date of Discharge: 02-02-09

- TOP


History Real case of brain abscess presented
with H/o. Febrile rigors CT scan Brain shows
central abscess seen

Treatment given in Hospital

Ty Nils 1000 cc V. Kflow

Discharge Treatment

Tabs. Levofloxacin 1H1 Penicillin G 600,000 i.u. q 6h
with paracetamol 500mg with 100mg of 3000


Medical Officer

D. Masood Mukhtar
Consultant

ATTESTED

POF Hospital, Wah Cantt
Patient Tests Result Report

www.pofvsn.com.pk

Reception ID: 24039
Paid Rec No: P-303

52 11

Entered By: Mr Chams Uz
Dec 17, 08 12:14
Printed On: Dec 23, 08 17:24
Cytology No: 565/08

Patient Name: Miss KIFAI H
Sex / Age: Female 18

(18)

Test	Result
CYTOLOGY STUDIES	
Referred by:	NA
Specimen: ABCESS.	
Micro Findings, Aspiration / Fluids: The smear show:	
a) Necrotic material = ++	
b) Polymorph neutrophils = +++	
OPINION: ABCESS MATERIAL	

Report Authorised by: Dr. Javed Iqbal

This report is a computer generated report which is verified by a pathologist. Therefore signatures are not required.

ATTESTED

Suprema Test Software (Pvt) Ltd
http://www.suprematest.com
LMS 001 01

DEPARTMENT OF MICROBIOLOGY
POF HOSPITAL WAH CANTT

53
199

Telephone-566031-9
Fax: 5267

Patient's Name D/o. Gula Kipini Hussein Age 16/12/88
Referred by _____ Sex Female
Nature of Test Brain Abscess CULTURE & SENSITIVITY.

LABORATORY REPORT

1. The Smear Deposit Shows Dub. cells etc
2. The Culture has Yielded growth of Anaerobic Bacteria

at 37°C/24 hrs incubation

SENSITIVITY PATTERN

1. FORTUM (Coftazidimo) _____
2. CEFODID (Cefoperazone) Resistance S
3. CLAFORAN (Cefotaxime) _____
4. CEFIZOX (Ceftizoxime) Ceftizoxime S
5. CIPROFLOXACIN _____
6. TARIVID (Ofloxacin) Metacridazole S
7. NOROXIN (Norfloxacin) _____
8. URIXIN (Pipemidic Acid) _____
9. AZACTAM (Aztreonam) _____
10. GETAMICIN S
11. NEBCIN (Tobramycin) _____
12. AMIKIN (Amikacin) _____
13. GEOPEN/PYOPEN (Carbapenem) _____
14. PIPRIL (Piperacillin) _____

Key: R-RESISTANT 383
S-SENSITIVE
INTERMEDIATE 12 to 20
POF Hospital Wah Cantt

PATHOLOGIST
POF HOSPITAL
WAH CANTT

ATTESTED

54 13
②0

CTC

DEPARTMENT OF MICROBIOLOGY

POF HOSPITAL WAH CANTT

Telephone-566031-9
Ext:- 5267

Patient's Name D/o Late K. P. Huzair Age 16/1/88

Referred by _____ Sex Female

Nature of Test Brain Abscess CULTURE & SENSITIVITY.

LABORATORY REPORT

1. The Smear Deposit Shows D/G with G.O

2. The Culture has Yielded growth of Amesbia Pasteurii

at 37°C/24 hrs incubation

SENSITIVITY PATTERN

1. FORTUM (Ceftazidime) _____
2. CEFODIN (Cefoperazone) _____
3. CLAFORAN (Cefotaxime) Penicillin S
4. CEFIZOX (Ceftizoxime) Ceftazidime S
5. CIPROFLOXACIN _____
6. TARIVID (Ofloxacin) Metroidazole S
7. NOROXIN (Norfloxacin) _____
8. URIXIN (Pipemidic Acid) _____
9. AZACTAM (Aztreonam) _____
10. GETAMICIN S
11. NEBCIN (Tobramycin) _____
12. AMIKIN (Amikacin) _____
13. GEOPEN/PYOPEN (Carbenicillin) _____
14. PIPRIL (Piperacillin) _____

Key:- R-RESISTANT 383
S-SENSITIVE
INTERMEDIATE 1209
POF Hospital Wah Cantt.

PATHOLOGIST
POF HOSPITAL
WAH CANTT
POF HOSPITAL WAH CANTT.

ATTESTED

POF Hospital, Wah Cantt

Patient Tests Result Report

www.pofwah.com.pk

Reception ID: 36039

Paid Rec. No.: P-283

Entered By: Mr St

Dec 1

Printed On: Dec 2

Cytology No: 566

55

(21)

Patient Name: Miss KIFAT -1
Sex / Age: Female 16

Test Result

CYTOLOGY STUDIES

Referred by: NA

Specimen: ABSCESS

Major Findings: Aspiration / Fluids :

The smear show:

- i) Necrotic material = ++
- ii) Polymorph neutrophils = +++

OPINION: ABSCESS MATERIAL

Report Authorized by: Dr. Javed Iqbal

Note: This is a computer generated report duly verified by a pathologist, therefore signatures are not required.

ATTESTED

ISTAN
NITIVE
MEDIA
Hospital

POF HOSPITAL

Department Tests conducted by
www.pofwah.com.pk

DMS

56
(23)

پشاور ایسٹ آباد اسلام آباد اور کراچی سے ایک وقت شائع ہونے والا سیرالاشاعت قومی روزنامہ

روزنامہ

سیرالاشاعت قومی

لیٹ آؤٹ پاکستان

جلد 16 | 22 فروری 2012ء | 29 دسمبر 1433ھ | قیمت 7 روپے | شمارہ 124

ایک ٹی ڈی او ہتھیار بھگرا آئے غریب ملازمین کو نوکری سے نکال دیا

پشاور (پشاور) اور کراچی (کراچی) کے ملازمین کی طرف سے ایک ٹی ڈی او کے خلاف احتجاجی مظاہرے ہوئے۔

پشاور (پشاور) اور کراچی (کراچی) کے ملازمین کی طرف سے ایک ٹی ڈی او کے خلاف احتجاجی مظاہرے ہوئے۔

پشاور (پشاور) اور کراچی (کراچی) کے ملازمین کی طرف سے ایک ٹی ڈی او کے خلاف احتجاجی مظاہرے ہوئے۔

پشاور ایسٹ آباد اسلام آباد اور کراچی سے ایک وقت شائع ہونے والا سیرالاشاعت قومی روزنامہ

روزنامہ

سیرالاشاعت قومی

لیٹ آؤٹ پاکستان

جلد 16 | 28 فروری 2012ء | 5 دسمبر 1433ھ | قیمت 7 روپے | شمارہ 130

بچے فوری انصاف فراہم کیا جائے تریا بی بی کی اپیل

پشاور (پشاور) اور کراچی (کراچی) کے ملازمین کی طرف سے ایک ٹی ڈی او کے خلاف احتجاجی مظاہرے ہوئے۔

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پشاور (پشاور) اور کراچی (کراچی) کے ملازمین کی طرف سے ایک ٹی ڈی او کے خلاف احتجاجی مظاہرے ہوئے۔

ATTESTED

انگریزی میں لکھی ہوئی ہے۔

درج ذیل باتوں پر غور کیا گیا ہے۔

۱۔

یہ کہ سالانہ سرکاری اہلی زمرہ جو کہ غیر محفوظ قرار دیا گیا ہے۔

۲۔ اس سال کے صرف مقررہ جگہوں پر ماہوار اہلی زمرہ انگریزی

۳۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

۴۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

۵۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

۶۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

۷۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

۸۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

۹۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

۱۰۔ اس سال کے صرف مقررہ جگہوں پر انگریزی اہلی زمرہ کی

Ammanve 'C' کنڈرٹ صاحب سکریٹری ایف ایم ایف پیپر کنٹون واہ کراچی اور

58

حماہ شریانی بی زوم سید کفایت حسین شاہ سکریٹری تعلیمی
گرم خون ما پیپر کھیل و تعلیم شریانی اور۔ (سابقہ ڈائری)
سائلر -

اپریل بریفنگ حکم کردہ 11/15/14 ڈائری کراچی میں بلوچستان
KPK حکم کردہ 6/11/14 ڈی ایچ اور حکم کردہ
14/10/15
پیر جاری کردہ 8/11/14 ڈی ایچ اور حکم کردہ 11/15/14 کراچی اور۔

اسٹیٹ پیپر سٹیٹ کوٹنگ پیپر بحال کرنا جاری اور حکم
آرڈر جاری کردہ 6/11/14 ڈی ایچ اور حکم کردہ
8/10/11 جاری کردہ DHO سٹیٹ کوٹنگ پیپر و منسوخ کرنا
جائے۔

صاف کاری:۔ اپریل ذیل عمل ہے۔

1۔ سٹیٹ کوٹنگ پیپر کفایت کفایت ڈائری BPS 2 میں صرف 10/9/09
کو برقی۔

2۔ یہ اسٹیٹ کوٹنگ پیپر ایف ایم ایف پیپر میں اسٹیٹ کوٹنگ
ایف ایم ایف پیپر میں اسٹیٹ کوٹنگ پیپر 2011 میں اسٹیٹ کوٹنگ
پیپر کے لیے پیپر ڈیولپمنٹ آفیس آف ایف ایم ایف پیپر سے
پورا کیا جائے۔ دوبارہ عدالت عالیہ سٹیٹ کوٹنگ پیپر سے
شروع کیا گیا اور اسٹیٹ کوٹنگ پیپر 14/9 کو کفایت
3۔ 10/11/14 کے ذریعے DHO سٹیٹ کوٹنگ پیپر کے لیے اسٹیٹ کوٹنگ
صاف کاری کے سٹیٹ کوٹنگ پیپر 3 ماہ کے لیے بھیج دیا۔
تفصیلات اسٹیٹ کوٹنگ پیپر کے نقل لف ہے۔

3. یہ کہ OHSO سٹیٹم کے ساتھ غیر موجودگی میں ایک فرد ساہلیہ
اور اس کے حققت انٹرا سٹیٹ کی سٹیٹم کو سرپرست کے لئے 15-4510
قرارداد 8/10 کو نوٹری سے سرپرست کو نقل کر دیا۔

4. یہ کہ مذکورہ آرڈر میں سٹیٹم کے حقوق من حققت انٹرا
بابت جی ڈی ایف کے ساتھ دیا گیا ہے۔ مذکورہ ڈی ایف من حققت
جس کے ساتھ آرڈر میں سٹیٹم کو اس کے ساتھ ساتھ اور
اسی طرح مذکورہ سٹیٹم کو اس کے ساتھ ساتھ اور
مذکورہ سٹیٹم میں اور سٹیٹم کے ساتھ ساتھ اور
دائروں کے ڈی ایف کے ساتھ ساتھ اور سٹیٹم کے ساتھ ساتھ اور

5. یہ کہ سٹیٹم کے ساتھ ساتھ 40 کے قریب دستاویز
جس کے ساتھ ساتھ اور اس کے ساتھ ساتھ اور
نہ ہے اور سٹیٹم کے ساتھ ساتھ اور
دائری کے ساتھ ساتھ اور اس کے ساتھ ساتھ اور
نیل ہیں۔

- 1. صحیح تاج النساء 2. صحیح سٹیٹم لی بی 3. صحیح لی بی 4.
 - 5. لی بی تسلیم 5. جمل نظیرہ 6. لی بی انٹرا سٹیٹم 7. صحیح لی بی
 - 8. لی بی انٹرا سٹیٹم 9. لی بی سٹیٹم 10. لی بی سٹیٹم
 - 11. لی بی انٹرا سٹیٹم 12. لی بی سٹیٹم 13. لی بی سٹیٹم
 - 14. لی بی سٹیٹم 15. لی بی سٹیٹم
 - 16. حققت لی بی 17. لی بی دل اور جانہ 18. لی بی سٹیٹم 19. لی بی سٹیٹم
- مذکورہ سٹیٹم کے ساتھ ساتھ اور سٹیٹم کے ساتھ ساتھ اور

6. یہ کہ مذکورہ غیر قانونی آرڈر کے ساتھ ساتھ اور
سٹیٹم کے ساتھ ساتھ اور سٹیٹم کے ساتھ ساتھ اور
سٹیٹم کے ساتھ ساتھ اور سٹیٹم کے ساتھ ساتھ اور
سٹیٹم کے ساتھ ساتھ اور سٹیٹم کے ساتھ ساتھ اور
سٹیٹم کے ساتھ ساتھ اور سٹیٹم کے ساتھ ساتھ اور
سٹیٹم کے ساتھ ساتھ اور سٹیٹم کے ساتھ ساتھ اور

7:- یہ کم سے کم 09 پہلوئے ساتھ کو دوبارہ 11/15 کو اپیل پر مبنیہ کر کے نوکری پر عمل کرنا۔

8:- یہ کم سے کم 0110 ٹیگٹرام کے لپٹی کی شہور ماڈرن لیس انڈیا کے لئے نوکری سے بہتر ہے۔ جبکہ دیگر کسی بھی دکان نوکری سے بہتر نہیں ہے۔ کیا ضروریہ ڈیلووم پورے پاکستان اور ٹیگٹرام میں ساتھ کئی بہتر ہے۔

9:- یہ کم سے کم انوکریہ آؤٹریہ DH0 کے اپنے آرڈر 8/10 میں ڈیکریہ ایس نام کا لپٹی ڈائریہ ایسڈ نام کا کسی ڈائریہ نے ٹیگٹرام میں گنٹریہ 30 سال میں ڈیوٹی نہیں کی ہے۔ اور DH0 نے خود ساختہ نام آرڈر میں ڈیکریہ ہے۔

10:- یہ کم سے کم کے ساتھ اسے خداداد ذوالکفای ہے کیونکہ ساتھ کے حقوق جو انڈیا DH0 نے طاعت ہے ہیں وہ سب کے سب من گھڑت اور خود ساختہ ہیں۔

لسٹڈ اسٹریٹ جی ایم ساتھ و عہد نام
سابقہ سرکار نے نوکری پر عمل کیا جانے
اور لسٹڈ 2654 3110 14/15 پر کم
صدر فرمایا جاوے۔

انروم 21/2015

حماہ شرایبی بزور کفایت لکھنؤ سیکرٹری ٹریڈ یونین ضلع پورہ ضلع پورہ

(سابقہ دانی) جسٹس جگت ضلع ٹیگٹرام

ٹریڈ یونین

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 207 /ST Dated 25 /1 / 2017

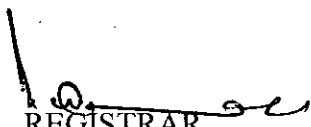
To

The Director General, Health Services,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - JUDGMENT

I am directed to forward herewith a certified copy of Judgement dated 17.01.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.