

22.08.2016


Appellant in person present. Due to strike of the Bar learned counsel for the appellant is not in attendance before the Tribunal therefore, case is adjourned for preliminary hearing to 27.09.2016 before S.B.


Chairman

27.09.2016

Counsel for the appellant and Addl. AG present. Preliminary arguments heard and record perused.

Vide our detailed order of to-day in appeal No. 144/2015, titled "Hidayatullah Versus Government of Khyber Pakhtunkhwa through Secretary Health Department, Peshawar etc.", the instant service appeal also stands disposed of in limine. File be consigned to the record room.


CHAIRMAN
27.09.16.

ANNOUNCED

27.09.2016


26.4.2016

Counsel for the appellant present. Learned counsel for the appellant has impugned orders dated 8.09.2014 vide which he was not promoted to BPS-18 and order dated 30.08.2007 vide which his absence was treated as leave without pay. Let pre-admission notice be issued to the respondents for Preliminary hearing for 19.05.2016 before S.B.


Chairman


19.05.2016

Appellant in person present. Notice could not be issued to the respondents due to non-submission of spare copies of the service appeal. The appellant/counsel for the appellant is directed to submit spare copies of the appeal where-after as already ordered pre-admission notice be issued to the respondents for 25.07.2016 before S.B.


Member

25.07.2016




Appellant in person present. Spare copies of appeal not submitted. Appellant is directed to submit the same within 3 days where-after pre-admission notice be issued to the respondents. To come up for preliminary hearing on 22.08.2016 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 319/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	30.03.2016	<p>The appeal of Dr. Hidayat Ullah resubmitted today by Mr. Asad Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2	31-3-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>12.4.16</u>.</p> <p> CHAIRMAN</p>
	12.04.2016	<p>Appellant in person present. Submitted an application for adjournment. Adjourned for preliminary hearing to 26.4.2016 before S.B.</p> <p> Chairman</p>

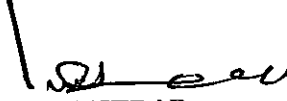
The appeal of Dr. Hidayatullah son of Gul Akram Khan F.R Bannu received to-day i.e. on 21.03.2016 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Copy of adjustment letter mentioned in para-3 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copies of 1st and 2nd stoooped salary sheet mentioned in the memo of appeal Annexure-E & F are not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- 4- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.

No. 477/S.T,


Dt. 22/3/2016

Mr. Asad Jan Adv. Pesh.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Reported SW

Resubmitted after completion


Asad Jan Adv. Pesh.
ASJC

Handwritten notes and date: 319/16

27.09.2016

Counsel for the appellant and Addl. AG present.
Preliminary arguments heard and record perused.

Vide our detailed order of to-day in appeal No. 144/2015, titled "Hidayatullah Versus Government of Khyber Pakhtunkhwa through Secretary Health Department, Peshawar etc.", the instant service appeal ^{stands} is also disposed of in limine. File be consigned to the record room.



CHAIRMAN

ANNOUNCED

27.09.2016

BEFORE THE KHYBER PUKHTUN KHWA, SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1437 of 2015.

Hussain Khan Ex-Sub Inspector now ASI, District Chitral.

.....Appellant

Versus

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Malakand at Saidu Sharif, Swat.
3. District Police Officer, Chitral.

.....Respondents

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District Police Officer,
Chitral

IN THE COURT OF SERVICE TRIBUNAL KPK PESHAWAR

S A No. 319 / 2016

DOCTOR HIDAYAT ULLAH S/O GUL AKRAM KHAN R/O PRESENTLY
F.R. BANNU

----- PETITIONER

VERSUS

1. THE GOVT. OF KHYBER PAKHTUNKHWA THROUGH SECRETARY HEALTH, CIVIL SECRETARY, HEALTH CIVIL SECRETARETARIAT, PESHAWAR.
2. THE DIRECTOR GANERAL, HELTH SERVICES, ATTACHED DEAPARTMENT, COMPLEX, KHYBER ROAD PESHAWAR.

-----RESPONDENTS

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PETITIONER

THROUGH

ASAD JAN
(ADVOCATE HIGH COURT)



OFFICE: ROOM NO. 211 AL-MUMTAZ HOTEL HASHTNAGRI PESHAWAR.

CELL NO. 0333-9117513

1

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

W.F. Province
Service Tribunal
Diary No. 250
Dated 21-03-2016

S.A. NO. 319...../2016

DOCTOR HIDAYAT ULLAH S/O GUL AKRAM KHAN R/O PRESENTLY
F.R. BANNU

.....APPELLANT

VERSUS

1. THE GOVT. OF KHYBER PAKHTUNKHWA THROUGH SECRETARY HEALTH, CIVIL SECRETARIAT, PESHAWAR.
2. THE DIRECTOR GENERAL, HEALTH SERVICES, ATTACHED DEPARTMENT, COMPLEX, KHYBER ROAD PESHAWAR.

.....RESPONDENTS

APPEAL U/ S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE OFFICE ORDER DATED 25.03.2014 TO THE EXTENT WHEREBY HIS ABSENCE PERIOD FROM 12.03.2008 TO 31.10.2008 WAS TREATED AS EXTRA ORDINARY LEAVE WITHOUT PAY AND ALSO FROM THE OFFICE ORDER DATED 30.08.2007 TO THE EXTENT WHEREBY THE ABSENCE PERIOD FROM 02.03.2005 TO 29.03.2006 WAS TREATED AS EXTRA ORDINARY LEAVE WITHOUT PAY AND ALSO FROM THE ACT OF RESPONDENTS BY NOT ALLOWING HIM HIS DUE PROMOTION TO PBS-19 BEING HAVING QUALIFIED AND FULFILLING ALL CRITERIA AND ALSO FROM THE ACT OF RESPONDENTS BY NOT TREATING HIM AS RETIRED IN BPS-19 AS WELL AS FROM THE ACT OF RESPONDENTS BY NOT RELEASING HIS PENSIONARY BENEFITS / PERK AND PRIVILEGES AND AS SUCH APPELLANT APPEAL WAS NOT ACCEPTED AS EVIDENT FROM THE OFFICE ORDER DATED 25.03.2014

Respectfully Sheweth;

The appellant submits as under:-

- 1- That Appellant was appointed as a dental surgeon on 26th August 1987, in Rural Health Centre (R.H.C) Sabir Abad, district Karak, ever since his appointment the Appellant was performing his duty with full devotion and there is no complaint what so ever regarding his performance. During the course of his service he has served in various hospitals without any complaint.
- 2- That the promotion of the Appellant was due from 1999 from BPS 17 to BPS 18 and in this regard the Directorate General Health Services, NWFP Peshawar through letter No. 974-84 ADD Dated 08/09/2004 also accepted the same and the Appellant was directed to complete their ACRs synopsis for the period mentioned against the Appellant required, the same was also provided by the Appellant but till now Appellant was not promoted to BPS 18 and 19 malafidely. (Copy of letter is annexed as annexure "A").

Filed to dir
21/3/16

re-submitted to dir
and filed.
30/3/16

- 3- That while serving in the said capacity the Appellant was transferred from Dir to RHC Nizam Pur Nowshehra/KCD and then placed at the disposal of EDO (H) Mansehra on 01/03/2005, but due to some domestic problems in which the study of children at Peshawar and suffering of Appellant wife from a permanently Schizophrenia disease which is a severe mental

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disorder and such patient can not be left alone and the Appellant remained absent from duty in Mansehra from March 2005 till March 2006 which was not willful absence and even in this regard the Appellant has written to the Minister for Health NWFP Peshawar, dated 30/05/2005, Dairy no. 1491, for adjustment at Peshawar but all in vain.

(Copy of the medical reports of the Appellant's wife disease and adjustment letter is annexed as annexure "B")

- 4- That during the absence from service for the above mentioned reasons the Appellant was suspended from service with a show cause notice, the Appellant's appeal was accepted and again regularized without pay, for said period the salary of the Appellant was stopped from March 2005 till March 2006, without hearing and no proper explanation. The Appellant appealed for the release of his pay without issuing show cause notice or inquiry by health department but was unheard. Though Appellant was reinstated in service but the said period considered as leave with out pay in illegal manner. **(Copy of departmental appeal, EOL order is annexed as annexure "C" & "D")**
- 5- That in March 2008 the D.H.O visited Shehbaz Garri and stopped the salary of the Appellant from March 2008 till October 2009 on the plea that the Appellant is absent from his duty while the Dental Register Record is clearly evident that Appellant is a man of duty and all the allegations are false and concocted one. The attendance was marked by the Nazim and due to his error and mistake he made the Appellant absent from duty while the Dental Register Record clearly shows his presence. So stopping the salary from March 2008 till October 2008 is against law and justice. **(Copy order is annexed is Annexure "E")**
- 6- That the Appellant serve for requisite period i.e. five years in BPS 17 required for promotion from 17 to 18 and similarly the other required services for promotion in BPS 19 but was illegally and with ulterior motive not promoted and as such discriminated in service which act of respondents is in violation of his constitutional and guaranteed right, moreover Appellant was made retired in BPS 17 and therefore Appellant fundamental right was also violated and even pension of the Appellant was withheld illegally for long period and as such discriminated in service and continued so far. **(Copy of the letter of retirement is annexed as Annexure "F")**
- 7- That act of respondent is affecting pensionary benefit, hence fresh cause of action and recurring cause of action.
- 8- That due to non-release and with holding of Appellant pension, Appellant is maintaining his family in very miserable conditions.
- 9- That Appellant was retired from service vide notification dated 18.10.2014 but respondents due to malafide reasons are not releasing all back date monthly pensions till to date which appellant right to be even given as per his due promotion in BPS-19 this act of respondents is illegal and in violation of the rules.
- 10- That appellant is aggrieved from the office order dated 25.03.2014 to the extent whereby his absence period from 12.03.2008 to 31.10.2008 was treated as Extra Ordinary Leave without pay and also from the office order dated 30.08.2007 to the extent whereby the absence period from 02.03.2005 to 29.03.2006 was treated as Extra Ordinary Leave without pay and also from the act of respondents by not allowing him his due promotion to PBS-19 being having qualified and fulfilling all criteria and also from the act of respondents by not treating him as retired in BPS-19 as well as from the act of respondents by not releasing his pensionary benefits / perk and privileges , hence prefer instant appeal on the following grounds amongst others:-

GROUND

- I- That respondents have not treated Appellant in accordance with law, rules and policy on the subject and acted in violation of article 4 of constitution of Islamic Republic of Pakistan 1973 and unlawfully refused to promote the Appellant from BPS-17 to BPS-18 and BPS-19 which is unjust, unfair and hence not sustainable in the eye of law.
- II- That the Appellant was never allowed opportunity of personal hearing thus he was condemned unheard.
- III- That the Appellant has never absented himself from duty since March 2008 till October 2008 and thus the allegations that he remained absent from duty is false and baseless.
- IV- That the absent from duty since March 2005 till March 2006 was not willful but beyond the control of Appellant due the serious disease of his wife and as such Appellant for all service benefits during said period.
- V- That the Appellant has been retired from service since October 2014 but respondents have not released the Appellant pensionery benefits as per his.
- VI- That the pension of the Appellant is with held illegally and not releasing pension to Appellant.
- VII- That as per settled law, pensionery benefit as well as monetary benefits refusal gives recurring cause of action, hence the instant appeal is within time.
- VIII- That appellant approached Peshawar High Court Peshawar for redressal of his grievances but the writ petition was sent to this Hon,able court for proceeding in accordance with law, however, on the previous date, the appellant was directed to present his grievances through service appeal, hence instant appeal as per direction of this Hon,able court and on these grounds too appellant appeal is within time.

IT IS THEREFORE, MOST HUMBLY PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE OFFICE ORDER DATED 25.03.2014 TO THE EXTENT WHEREBY HIS ABSENCE PERIOD FROM 12.03.2008 TO 31.10.2008 WAS TREATED AS EXTRA ORDINARY LEAVE WITHOUT PAY AND ALSO THE OFFICE ORDER DATED 30.08.2007 TO THE EXTENT WHEREBY THE ABSENCE PERIOD FROM 02.03.2005 TO 29.03.2006 WAS TREATED AS EXTRA ORDINARY LEAVE WITHOUT PAY AND ALSO FROM THE ACT OF RESPONDENTS BY NOT ALLOWING HIM HIS DUE PROMOTION TO BPS-19 BEING HAVING QUALIFIED AND FULFILLING ALL CRITERIA AND ALSO THE ACT OF RESPONDENTS BY NOT TREATING HIM AS RETIRED IN BPS-19 AS WELL AS THE ACT OF RESPONDENTS BY NOT RELEASING HIS PENSIONERY BENEFITS / PERK AND PRIVILEGES AND AS SUCH APPELLANT DEPARTMENTAL APPEAL WAS NOT ACCEPTED IN ILLEGAL MANNER WHICH NEEDS TO BE SET ASIDE BY ALLOWING APPELLANT ALL HIS DUE BENEFITS AS REQUIRED UNDER THE LAW TO WHICH APPELLANT IS FOUND ENTITLED

Asad Jan

APPELLANT

Through

Asad Jan

ASAD JAN

(Advocate Supreme Court of Pakistan)

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

S.A. NO..... /2016

DOCTOR HIDAYAT ULLAH S/O GUL AKRAM KHAN R/O PRESENTLY F.R. BANNU

.....APPELLANT

VERSUS

1. THE GOVT. OF KHYBER PAKHTUNKHWA THROUGH SECRETARY HEALTH, CIVIL SECRETARIAT, PESHAWAR.
2. THE DIRECTOR GENERAL, HEALTH SERVICES, ATTACHED DEPARTMENT, COMPLEX, KHYBER ROAD PESHAWAR.

.....RESPONDENTS

APPLICATION FOR CONDONATION OF DELAY IF ANY IN FILING OF THE ABOVE TITLED SERVICE APPEAL

Respectfully Sheweth,

The appellant / petitioner submits as under:-

- 1- That Appellant/petitioner has filed writ petition before Hon,able Peshawar Court Peshawar but the same was sent to this Hon,able Court.
- 2- That due to above mentioned fact the delay if any needs to be condoned in the interest of justice because there is no willful delay rather the same was due to litigating before wrong forum.
- 3- That above-mentioned reason is a sufficient reason for condonation of delay.
- 4- That law favour adjudication on merits.

IT IS THEREFORE, MOST HUMBLY PRAYED THAT ON ACCEPTANCE OF THIS APPLICATION THE DALEY IF ANY MAY KINDLY BE CONDONED IN THE INTEREST OF JUSTICE

PETITIONER / APPELLANT

 Through

ASAD JAN
(Advocate Supreme Court of Pakistan)

(4)

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

S.A. NO...../2016

DOCTOR HIDAYAT ULLAH S/O GUL AKRAM KHAN R/O PRESENTLY

F.R. BANNU

----- **PETITIONER**

VERSUS

1. THE GOVT. OF KHYBER PAKHTUNKHWA THROUGH SECRETARY HEALTH, CIVIL SECRETARY, HEALTH CIVIL SECRETARIAT, PESHAWAR.
2. THE DIRECTOR GENERAL, HEALTH SERVICES, ATTACHED DEPARTMENT, COMPLEX, KHYBER ROAD PESHAWAR.

----- **RESPONDENTS**

AFFIDAVIT

As per instruction of my client I, Asad Jan advocate (Peshawar high court) do hereby solemnly affirm and declare that the contents of the appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed or kept secret from this Hon, able court.

DEPONENT



21-23-16

(9)

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

S.A. NO...../2016

DOCTOR HIDAYAT ULLAH S/O GUL AKRAM KHAN R/O PRESENTLY

F.R. BANNU

----- **PETITIONER**

VERSUS

1. THE GOVT. OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY HEALTH, CIVIL SECRETARY, HEALTH CIVIL
SECRETARIAT, PESHAWAR AND ANOTHER.

..... **RESPONDENTS**

ADDRESSES OF THE PARTIES

APPELLANT

DOCTOR HIDAYAT ULLAH S/O GUL AKRAM KHAN R/O PRESENTLY

F.R. BANNU

VERSUS

RESPONDENTS:

1. THE GOVT. OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY HEALTH, CIVIL SECRETARY, HEALTH CIVIL
SECRETARIAT, PESHAWAR.
2. THE DIRECTOR GENERAL, HEALTH SERVICES, ATTACHED
DEPARTMENT, COMPLEX, KHYBER ROAD PESHAWAR.


Appellant

 Through
ASAD JAN

(Advocate Supreme Court of Pakistan)

6

Annexure A

MOST IMMEDIATE.

DIRECTORATE GENERAL.
HEALTH SERVICES, N.W.F.P. PESHAWAR.

No. 974-84 /ADD-Dated 08 /09/2004.

To

The Principal, K.C.D., Peshawar.
The Executive District Officers (Health),
Peshawar, Charsadda, Nowshera, Haripur,
Bannu, Lakki-Marwat, Tank and Dikhan.
The M/S DHQ Hospital, Swabi.
The Agency Surgeon, North Waziristan, Miranshah.

Subject: PROMOTION OF DENTAL SURGEON FROM BPS-17 TO BPS-18

Memo:

This is to inform you that following Dental Surgeons BPS-17 are due for promotion to BPS-18, but their ACRs for the period mentioned against each are not available in this Directorate NWFP. Peshawar.

In order to complete their ACRs synopsis, the ACRs for the period noted against each are required. You are requested to kindly write the requisite ACRs and sent to this Directorate to proceed further in the matter.

Sl. No.	Name of Dental Surgeon/with Institution.	Period required.
01.	Dr. Zafar Ali Shah, RHC, Ama Khel Distt: Tan.	2003.
02.	Dr. Zafar Iqbal Ahmed, RHC, Badbher Distt: Peshawar.	2001, 2003.
03.	Dr. Rehmatullah CH, Paniala Distt: Dikhan.	2001, 2003.
04.	Dr. Faridullah Shah KCD, Peshawar.	2002, 2003.
05.	Dr. Muhammad Farooq, RHC, Domei Distt: Bannu.	2002, 2003.
06.	Dr. Iftikhar Ahmed Khattak KCD, Peshawar.	2001, 2002, 2003.
07.	Dr. Muhammad Afzal, On leave.	89, 90, 93, 95, 96, 97, 1-1-98 to 29-5-98, 99, 2000, 2001, 2002, 2003.
08.	Dr. Muhammad Tahir Javed CH, Jandola FR: Tan.	89, 01-1-2000 to 16-4-2000, 25-6-2001 to 31-12-2001, 2002, 2003.
09.	Dr. Mian Haroon Shah CH, Ziarat Kaka Sahib District Nowshera.	92, 95, 96, 97, 98, 99, 2000, 2001, 2002, 2003.
10.	Dr. Qazi Amjad Qadus Absent.	94, 95, 96, 97, 98, 99, 2000, 2002 2002, 2003.
11.	Dr. Sanaullah Khan RHC, Kirri Shamoza Distt: Dikhan.	01-1-88 to 31-3-88, 16-10-97 to 31-12-97, 98, 2000, 1-1-2001 to 31-8-2001, 2003.
12.	Dr. Muhammad Naeem Ahmed KCD, Peshawar.	2002, 2003.
13.	Dr. Nasrullah Jan RHC, Landiwah, Lakki.	1-1-88 to 31-3-88, 1-1-91 to 16-3-91, 06-8-91 to 31-12-91 2003.
14.	Dr. Syed Muffareh Shah RHC, Jamalabad, Charsadda.	2003.

ATTESTED
ASAD T. A.
(Advocate High Court)
K-CJ/MIO

P.T.O.

Attested
Advo

7

Dr. Muhammad Arif Shah Bokhari. RHC, Kot-Najibullah, Haripur.	2002, 2003 92, 93, 94, 95, 96, 97, 98, 2001, 2002 2003.
Dr. Taj Nawaz Khan RHC, Serai Gambila, Lakki.	2003.
Dr. Muhammad Azhar CH, Mattani, Peshawar.	25-08-89, to 31-12-89, 1.1.91 to 19-3-1991, 98, 99, 2000, 2003.
Dr. Zakir Hussain KCD, Peshawar.	2003.
Dr. Rafique RHC, Paharpur, DIKhan.	91, 92, 93, 94, 95, 96, 97, 98, 99, 1.1.2000 to 31.3.2000, 2001, 2002, 2003.
Dr. Qazi Hanifur Rehman KCD, Peshawar.	02-06-2001, to, 12.2001, 2002, 2003.
Dr. Muhammad Tayyab KCD, Peshawar.	2001, 2002, 2003.
Dr. Sabir Shah RHC, Nahqi, Peshawar.	94..
Dr. Hidayatullah RHC, Nizampur, Nowshera/KCD.	1.1.90 to 25-5-90, 1.1.91 to 4-6-91, 94, 95, 96, 97, 99, 2000, 2001, 2002, 2003.
Dr. Sher Hasham Khan DHQ: Hospital, Swabi.	95, 11-9-97 to 31-12-97, 18.3.99 31-12-99, 2003.
Dr. Hafiz Muhammad Tahir RHC, Gul Imam, Tank.	90, 92, 98, 1.1.99 to 21-3-99 2003.
Dr. Muhammad Saleem Awan SH, Chowdwan, DIKhan.	98, 99, 2003.

An early action is requested.

(DR. MANZAR ANWAR KHAN)
ASSISTANT DIRECTOR (DENTISTRY)
DGHS NWFP, PESHAWAR.

985-1011 /ADD

Copy forwarded to the:-

- Dr. Zafar Ali Shah Dental Surgeon, RHC, Ama Khel District Tank.
- Dr. Zafar Iqbal Ahmed Dental Surgeon, RHC, Badbher District Peshawar.
- Dr. Rehmatullah Dental Surgeon, CH, Paniala District DIKhan
- Dr. Faridullah Shah Dental Surgeon KCD, Peshawar.
- Dr. Muhammad Farooq Dental Surgeon RHC, Pomei District Bannu.
- Dr. Iftikhar Ahmed Khattak Dental Surgeon KCD, Peshawar.
- Dr. Muhammad Afzal Dental Surgeon HMC, Peshawar.
- Dr. Muhammad Tahir Javed Dental Surgeon CH, Jandola FR: Tank.
- Dr. Mian Muhammad Haroon Shah Dental Surgeon CH, Ziarat Kaka Sahib Nowsh:
- Dr. Qazi Amjad Qadus Dental Surgeon Absent.
- Dr. Sanaullah Dental Surgeon RHC, Kirra Shamoza District DIKhan.
- Dr. Syed Muhammad Arif Shah Bokhari Dental Surgeon CH, Datta Khel NW: Agency
- Dr. Muhammad Naeem Ahmed Dental Surgeon KCD, Peshawar.
- Dr. Nasrullah Jan Dental Surgeon RHC, Landiwah District Lakki-Marwat.
- Dr. Syed Mufarreh Shah Dental Surgeon RHC, Jamalabad Distt: Charsadda.
- Dr. Akhtar Nawaz Khan Dental Surgeon, RHC, Kot-Najibullah Distt: Haripur.
- Dr. Taj Nawaz Khan Dental Surgeon, RHC, Serai Gambila Distt: Lakki-Marwat.
- Dr. Muhammad Azhar Dental Surgeon CH, Mattani District Peshawar.
- Dr. Zakir Hussain Dental Surgeon, KCD, Peshawar.
- Dr. Rafique Muhammad Dental Surgeon RHC, Paharpur District DIKhan.
- Dr. Qazi Hanifur Rehman Dental Surgeon KCD, Peshawar.
- Dr. Muhammad Tayyab Dental Surgeon KCD, Peshawar.
- Dr. Sabir Shah Dental Surgeon RHC, Nahqi District Peshawar.

ATTESTED

ASAD JAN
(Advocate High Court)
X-NJ/1510

P/3.....

Attested
Adv

- 1 | 2 | 3
- 24. Dr. Hidayatullah Dental Surgeon, KCD, Peshawar.
 - 25. Dr. Sher Hasham Khan Dental Surgeon DHQ: Hospital, Swabi.
 - 26. Dr. Muhammad Saleem Awan Dental Surgeon CH, Chowdwan Distt: DIKhan.
 - 27. Dr. Hafiz Muhammad Tahir Dental Surgeon RHC, Gul Imam Distt: Tank.

for information. They are advised to persue the matter at their personal level, immediately.

(Signature)
(D. MANZAR ANWAR KHAN)
ASSISTANT DIRECTOR (DENTISTRY)
DHS, NWFP, PESHAWAR.

No. 1012 /ADD

Copy forwarded to the Secretary to Government of NWFP Health Department, Peshawar for information please.

(Signature)
(D. MANZAR ANWAR KHAN)
ASSISTANT DIRECTOR (DENTISTRY)
DHS, NWFP, PESHAWAR.

8

Annexure : B

DATE.....

No. Rs. 5/-

OUTPATIENTS DEPTT-

NAME *U/S*

YEARLY NO. *19989*

DATE *27/4/05*

DISEASE *Lumbago*

FACE VALUE RUPEES 5/-

- Tab Tilocol
1+

- Tab Neurobion
1+

- Osteoem (reared) **ATTESTED**
1+ + +

Advised complete bed rest for four weeks

was 27/4/2005

Police & Services Hospital
Medical Officer
[Signature]

Attested

[Signature]
Advo

9

YEARLY NO.....

DATE.....

No.

Rs. 5/-

OUTPATIENTS DEPTT-

NAME ... M. J. Khan ...

YEARLY NO... 15782 ...

DATE... 6/4/05 ...

DISEASE ... Amibiasis ...

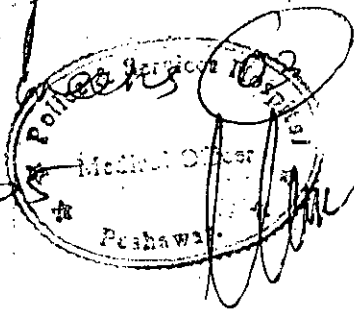
FACE VALUE RUPEES 5/-

- Cap Feldene
1 + 20mg

- Tab Benidox
1 +

- Nintogeno Gaur
1 + +

Advised complete bed rest
for three weeks
wef. 6/4/2005



Attested

Advo

10

12

DATE.....

No.

Rs, 5/-

side 3

OUTPATIENTS DEPT-

NAME *M. N. N.*

YEARLY NO. *12281*

DATE *16/3/05*

DISEASE

FACE VALUE RUPEES 5/-

Ch. Severe pain - the back radiating to the both legs. Also having a bout of depression due to wife's illness - she is suffering from Schizophrenia

FE local tenderness @.

Bending Capability -> limited.

SLR - Rt - 45°

LE - 30°.

ATTESTED

Asad Jan

ASAD JAN

(Advocate High Court)

X-CJ/5/MIC

R (4) Dep. Froben-SR

W (20) - NCR 14/1 2004/3

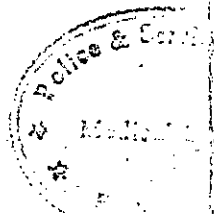
*Attested
Asad Jan
Adv.*

② Tab. Myonal
N^o 10 — 1 + 1

③ Tab. Danzen forte
N^o 10 — 1 + 1

Advised

Three week Bed Rest
at home w.e.f. today.



Jaligar

ULTRASOUND CLINIC

DR. RUKHSANA SOHAIL

M.B.B.S., M.U.S.P., M.A.I.U.M., (America)

Pediatrician Gynecologist & Obstetrician

ULTRASOUND SPECIALIST

D-4, Hayatabad, Phase 1, Near Khyber Park,

Peshawar Ph: 091-5813691

Patient's Name

Handwritten patient name

Date

29/11/2007

Report/Findings

Tab Short - F - 3cm

Handwritten notes

No - cal - detect

Handwritten notes

Tab BUS - 3 x 1 + 1

Handwritten notes

Handwritten notes

ATTESTED

ASAD JAN
(Advocate High Court)
S-CJ/JMO

Signature of Asad Jan

Attested
Signature
Adv

Handwritten signature

Large handwritten signature

لیڈی ڈاکٹر رخسانہ سہیل

ایم بی بی ایس، ایم یو ایس پی، ایم اے آئی یو ایم (امریکہ)

ماہر امراض زچہ بچہ، الزاساؤنڈ سپیشلسٹ

D-4 حیات آباد، فیز 1 نزد کھبر پارک، پشاور

فون: 091-5813691

Maqina

(12)

14

Instrumental U/S

Single, alive, cephalic fetus.

BPD 9cm (37w 10)
FL 7.5 (38w 5D)

Placenta fundus pos
 liquor adequate

BPP

ATTESTED

ASAD JAN

(Advocate High Court)
HMC

HR _____
Resp _____
Tone _____
C/BM _____
Liquor _____

10 / 10

Attested
Adv

Dr. Kaleem

ULTRASOUND CLINIC

DR. RUKHSANA SOHAIL

M.B.B.S., M.U.S.P., M.A.I.U.M., (America)

Pediatrician Gynecologist & Obstetrician

ULTRASOUND SPECIALIST

D-4, Hayatabad, Phase 1, Near Khyber park,
Peshawar 5813691

13

لیڈی ڈاکٹر رخسانہ سہیل

ایم بی بی ایس، ایم یو ایس پی، ایم اے آئی یو ایم (امریکہ)

ماہر امراض زچہ و بچہ، الٹراساؤنڈ سپیشلسٹ

D-4 حیات آباد، فیزا نزد خیبر پارک، پشاور

Patient's Name Nageem

Date 29/11/2007

Report Findings

Single pregnancy in PSOACH
 presentation.
 B.P.D is 87.8mm
 FL is 53.0mm
 Both corresponds to 28 weeks
 E.D.D. - 20-2-08 ± 10 days
 Fetal anatomy is normal.
 Placenta is funo-anterior
 not previa
 Amniotic fluid is adequate.
 Fetal movements are normal.

Single pregnancy
 28 weeks ± 10 days

Result

ATTESTED

ASAD JAN

ASAD JAN
(Advocate High Court)
K-C/J/MC

Attested
Adv
Adv

(14) (16)

HAYATAHAD MEDICAL COMPLEX, PESHAWAR.

Admission (M) = 11729
Admission (B) = 11730
Delivery no = 3717

HSS
HCU 7 - up
Pol-ops = 0

Name of the Patient: Nageena
Husband's Name: Hidayatullah

DOB: 19/11/55 Sex: ♀

DC of admission: 19/11/55

Diagnosis: 274/20 FIP

Operation: On 19/11/55, during delivery, there she delivered a baby as expected. His placenta delivered by the mother at vagina appeared normal, green, minimal bleeding at the end.

TREATMENT RECEIVED

1. Inj. R/S heart stimulant Regentan
2. Inj. - Flageol 102 mg 10/11/55
3. Inj. - Hevone (100 mg)
- 4.

TREATMENT PRESCRIBED

1. Cap. Evigra 100 mg 10/11/55
2. Tab. Panton 100 mg 10/11/55
3. Tab. - Tetracycline 500 mg 10/11/55

Baby notes

Age: 11730
Sex: ♂
ALS: 8/10
CS: 13/2

ATTESTED

Advocate High Court
K-CJ/3MTC

Attested
Advo

15

7



POSTGRADUATE MEDICAL COLLEGE
HAYATABAD
KOSHAHAR

W/O DR. Hidayatullah

Female

Room: SKH

ESHAMAR

Department: 4037

18-01-2009

Hospital Yearly No. --

History:

OP - T. Saeed
F-7

R/-

Admission

Fungal Smear

Clinical Examination

Provisional Diagnosis

DR. MIRAS

KOH- wet mount for fungus.

Delicate fungal hyphae seen in the smear.

(+)

Δ Mycotic infection of Skin.

Dr. Saeed

ATTESTED

ASAD JAN
(Advocate High Court)
X-CJ/JMO

Attested

Adv

1) Lomeni

تعمیراتی کام

20 دن

~~2) 20 دن~~

150V

ایک گڑب گڑب بینہ

4 بینہ

3) Tale. Aland

ایک گڑب گڑب 10 دن

Aerion

The Secretary Health
Govt. of Khyber Pukhtunkhwa

16

Annexure : C

Through: Proper Channels

Sub: **APPEAL FOR RESTORATION OF AS FULL PAY FOR THE
PERIOD OF ABSENCE WEF 2.3.2005 TO 2.3.2006**

Respected Sir,

Most kindly it is submitted that presently I am working as Dental Surgeon Civil Hospital, Jamrud. I have completed my service career 26 years in deptt of health. I have served in most of the hospitals of KPK in different districts, including hard areas as upper Dir.

During the year 2.3.2005 I was transferred from Nizampur, district Nowshera to Mansehra.

During the year 2.3.2005, I was personally ill and my wife was also suffering from Chronic Schizophrenic disease and was also in pregnancy state. I was mentally disturb and was also financially suffered a lot.

I view of the above circumstances, I could not made my arrival report to Mansehra and I was declared absent from service duty for the period 2.3.2005 to 2.3.2006 by health authorities without issuing any explanation/show cause notice or to proceed in enquiring of me by the health department.

Directly my case was referred to the Chief Secretary, Govt of NWFP. The Chief Secretary of NWFP issued a show cause notice which was served upon me (copy attached for your perusal).

I submitted my reply in regard to the show cause notice to the Chief Secretary Govt. of NWFP.

My reply was considered by the competent authority and in exercise of powers conferred upon him under section 03 read with section 08 of RSO 2000.

I was exonerated and the charges leveled against me. I was reinstated in service but for the period of my absence wef 2.3.2005 to 2.3.2006 was considered as without pay.

Now I am going to be retired on 10.10.2013. If the period of absence mentioned above would not be regularized as full pay, I would be affected financially very much in preparation of my pension case.

I have served my service in health department very honestly with dedication and have not given even a single complaint to my superiors.

ATTESTED
ASAD JAIN
(Advocate High Court)
K-CHUNDA

[Handwritten Signature]

Attested
[Handwritten Signature]
Advo

17

In view of the above circumstances I request you that the period of absence wef 2.3.2005 to 2.3.2006 may kindly be regularized as full pay (drawn) instead of without pay.

Obediently Yours,

Sd/-
(Dr. Hidayatullah)
Dental Surgeon
Civil Hospital,
Jamrud
Khyber Agency

ATTESTED



ASAD JAN
(Advocate High Court)
X-CJ/MIC

Attested



Adv

GOVERNMENT OF N.W.F.P.
HEALTH DEPARTMENT.

18

Dated Peshawar, the 30th August 2007.

Annexure

NO. SO(DH-II/3-18/2005). WHEREAS, disciplinary proceedings were initiated against Dr. Hidayatullah (BS-17), Dental Surgeon attached to EDO (H) Mardan under the NWFP Removal from Services (Special Powers) Ordinance, 2000.

2. AND WHEREAS, in terms of Section 5(4) of the Removal from Service (Special Powers) Ordinance, 2000, a show cause notice was served upon him on 14.4.2006.

3. AND WHEREAS, in response to show cause notice the officer submitted his reply and explained his position.

4. NOW THEREFORE, the competent authority after having considered the charges and evidence on record, reply of the accused officer to the show cause notice and in exercise of powers conferred on him under section 3 read with section 8 of RSO 2000, is pleased to exonerate Dr. Hidayatullah, Dental Surgeon of the charges levelled against him and to restate him in service with immediate effect.

5. The period of absence w.e.f. 2.3.2005 to 29.3.2006 is hereby regularized as Extra Ordinary Leave (without pay).

SECRETARY TO GOVT. OF NWFP
HEALTH DEPARTMENT.

For the Secretary to Govt. of NWFP

25/9/07

Director General, Health Services, NWFP, Peshawar.
Mardan.
Dental Surgeon.
Extra concerned.

Section Officer - II.
OFFICE OF THE DIRECTORATE GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

No. 1080-82/ADD. Dated Peshawar the 05/09/2007.
Copy of the above is forwarded to the:-

1. EDO (Health), Mardan.
2. DAD, Mardan.
3. Doctor concerned.

ATTESTED

ASAD TARIQ

Advocate
Peshawar

[Signature]

A record
MS

Attested
[Signature]

Advo

Dr. Manzar Anwar Khan
Asstt. Director Dentistry
Director General Health
Peshawar

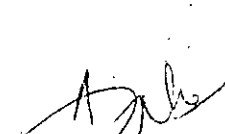
Recd 13/07/07
msl

No. 12817-19/000 dt 29/7/07

Copy forwarded to:

- ① D.A.O. Mardan.
- ② Accounts Section
- ③ District Commr

In signature

 15
Executive District Officer
(H) Mardan



GOVERNMENT OF KHYBER PAKHTUNKHWA

HEALTH DEPARTMENT

Annexure E

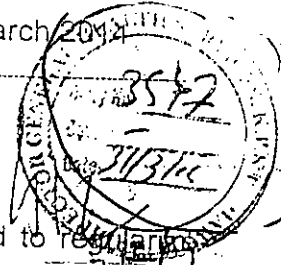
Dated Peshawar the 25th March 2014

19

NOTIFICATION

NO. SOH(E-V)6-23/2013

The competent authority is pleased to regularize the absence period w.e.f. 12-03-2008 to 31.10.2008 as Extra Ordinary Leave (without pay) in respect of Dr. Hidayatullah Dental Surgeon (BS-17) attached to DHO Office, Mardan.



SECRETARY HEALTH
Govt. of Khyber Pakhtunkhwa

Endst. of even No. & Date

Copy to:-

1. The Director General, Health Services Peshawar.
2. The District Health Officer, Mardan.
3. The District Accounts Officer, Mardan
4. The Computer Programmer Health Deptt.
5. PS to Secretary Health Department.
6. PA to Special Secretary Health Department.
7. Doctor concerned.

1125
1/4

(Signature)
(HINA HAFEEZ)

No. 3179
7/10/24

OFFICE OF THE DG HEALTH SERVICES, KHYBER PAKHTUNKHWA PESHAWAR.

No. 7633-36

E.O. Dated Pesh: the 3/14/2014.

- Copy to the :-
01. DHS FATA Peshawar.
 02. Agency Surgeon Khyber.
 03. AAO, Khyber at Jamrud.
 04. Doctor concerned.

For information and necessary action.

(Signature)
DIRECTOR (D-1)
DHS KPK, PESHAWAR.

ATTESTED

(Signature)

ASAD JAN
High Court

OFFICE OF THE DIRECTORATE HEALTH SERVICES FATA, PESHAWAR

NO. 6430-32 DHS/FATA/Admn

Date. 9/04/2014

Copy is forwarded to the:-

1. Agency Surgeon Khyber Agency.
2. Agency Accounts Officer Khyber at Jamrud.
3. Doctor Concerned.

For information and necessary action.

(Signature)
Advo

(Signature)
Director Health Services,
FATA, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Annexide 2Fs

Dated Peshawar the 21st April, 2014

NOTIFICATION

NO.SOH(E-V)16-23/2013 In terms of provisions of Rule-20, Sub Rule (1) of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules 1981 and instructions there under issued from time to time, sanction is hereby accorded to the grant of 365 days leave encashment in lieu of L.P.R in respect of Dr. Hidayatullah s/o Gul Akram Khan Ex-Dental Surgeon (BS-17) Civil Hospital Jamrud, Khyber Agency.

2. In terms of Section-13 of the Khyber Pakhtunkhwa Civil Servants Act 1973, the officer shall stand retire from service on 18/10/2013 (FN) on attaining the age of superannuation.

Health
NO. 5381
5/5/14

SECRETARY HEALTH
Govt. of Khyber Pakhtunkhwa

Endst. No. & Date even.

Copy to:-

1. Director General Health Services, Khyber Pakhtunkhwa Peshawar.
2. Director Health Services FATA, Peshawar.
3. Section Officer(Health) Social Sector Department FATA Secretariat.
4. Agency Surgeon Khyber Agency.
5. In-charge Civil Hospital Jamrud Khyber Agency.
6. Agency Accounts Officer Jamrud Khyber Agency.
7. Computer Programmer Health Dept.
8. PS to Secretary Health.
9. Doctor concerned.

SECTION OFFICER (E-V)

OFFICE OF THE DIRECTORATE HEALTH SERVICES FATA, PESHAWAR
NO. 7720-22 /DHS/FATA/Admn
Dated 5 /05/2014

Copy is forwarded to the:-

1. Agency Surgeon Khyber Agency.
2. Agency Accounts Officer Khyber at Jamrud.
3. Officer concerned.

For information and further necessary action.

Seen
13/5/2014

ATTESTED

ASAD JAN
(Advocate High Court)
E-CJ/MIO

Director Health Services,
FATA, Peshawar

Attested
Advo

(31)
OFFICE OF THE
EXECUTIVE DISTRICT OFFICER,
(HEALTH) MARDAN

NO. 5718 /EDO (H)

DATED 13 / 4 /2008

To,

The Accountant,
EDO(Health) office, Mardan.

Subject: Absent from Duty

Memo:

As desired by the District Govt. Mardan, you are directed to immediately stop the monthly salary (by giving change to the DAO Mardan) of Dr. Hidayat Ullah Dental Surgeon R.H.C. Shanbaz Garhi Mardan, absent from duty without any information / application till further order.

Executive District Officer,
(Health) Mardan

5718-21 EDO (H)

Copy to the:

1. District Nazim, Mardan for information w/ref: to his letter No.442-444 /ZN(M), dated 09-04-2008.
2. D.A.O. Mardan for necessary action.
3. S.M.O. RHC Shanbaz Garhi, Mardan.

RECEIVED

ASAD JAN

ASAD JAN
(Advocate High Court)
Y-C/M/M/O

Asad
Executive District Officer,
(Health) Mardan

Attached

Asad

13/4/08

22

GOVERNMENT OF N.W.F.P.
HEALTH DEPARTMENT.

Dated Peshawar, the 30th August 2007.

ORDER.

NO.SO(E)H-II/3-18/2005. WHEREAS, disciplinary proceedings were initiated against Dr. Hidayatullah (BS-17), Dental Surgeon attached to EDO (H) Mardan under the NWFP Removal from Services (Special Powers) Ordinance, 2000.

2. AND WHEREAS, in terms of Section 5(4) of the Removal from Service (Special Powers) Ordinance, 2000, a show cause notice was served upon him on 14.4.2006.

3. AND WHEREAS, in response to show cause notice the officer submitted his reply and explained his position.

4. NOW THEREFORE, the competent authority after having considered the charges and evidence on record, reply of the accused officer to the show cause notice and in exercise of powers conferred on him under section 3 read with section 8 of RSO 2000, is pleased to exonerate Dr. Hidiyatullah, Dental Surgeon of the charges leveled against him and to reinstate him in service with immediate effect.

5. The period of absence w.e.f. 2.3.2005 29.3.2006 is hereby regularized as Extra Ordinary Leave (without pay).

SECRETARY TO GOVT. OF NWFP
HEALTH DEPARTMENT.

Endst. NO. & date even.

Copy to the:-

1. Director General, Health Services, NWFP Peshawar.
2. EDO (H) Mardan.
3. DAO Mardan.
4. Doctor concerned.

Section Officer - II.

ATTESTED

ASAD JAN
(Advocate High Court)
S-C/J/M/C

Attested
Advocate
Advo

30/8/07



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to The Director General Health Services Peshawar and not to any official by name

Office Ph: 091-9210252 Exchange 091-9210167, 091-9210126 Fax: 091-9210130

No. 9615-1E-1

Dated the Pesh: 22/02/2013

23

To,

1. The Principals KCD Peshawar/KGMC Peshawar.
2. The Principal Bannu Medical College Bannu/BMC Mardan.
3. Director Health Services FATA Peshawar.
4. The M.S SGTH Swat.
5. The District Health Officers,
Charsadda, Nowshera, Mardan, Swabi, Makland, Swat, Buner,
Haripur, Abbottabad, Kohat, Lakki Marwat, and Bannu.
6. The M.S DHQ: Hospitals, (LMH) Kohat, Mardan, Chitral and
Daggar Buner.
7. The M.S AHQ: Hospital Miranshah.
8. The Agency Surgeon Khyber at Landi Kotal.

Directorate General Health Services Peshawar
1725
04/7/17

Subject: - **PROMOTION OF DENTAL SURGEON FROM (BS-17) TO SENIOR DENTAL SURGEON (BS-18).**

Memo,

This is to inform you that following Dental Surgeons (BS-17) are due for promotion to Senior Dental Surgeon (BS-18), but their ACRs for the period mentioned against each are not available in this Directorate General Khyber Pakhtunkhwa Peshawar.

In order to complete their ACRs synopsis the ACRs for the period noted against each are required. You are requested to kindly write the requisite ACRs and furnish Ten fresh Photographs Passport size and also (10-copies) of the certificate regarding No Departmental Judicial/Anti-Corruption/Enquiry etc against them so that a complete promotion case be sent to the Govt.:

S. NO.	NAME OF DENTAL SURGEON WITH INSTITUTE	PERIOD REQUIRED
1.	Dr. Muhammad Azhar, RHC Shargao Charsadda.	2010 to 2012
2.	Dr. Hidayat Ullah, RHC LEO Shalmar Khyber Agency.	2008 & 2010
3.	Dr. Nazir Ahmad, RHC Havelian Abbottabad	2010
4.	Dr. Muhammad Wali, RHC Kallang Mardan.	1994, 1995, 1996, 1997, 1998, 2000 to 2012.
5.	Dr. Shakeel Anwar, KCD Peshawar.	2012.
6.	Dr. Hashim Jamshid Syed, EDO (Health) Kchat.	1992 to 1999, 2001 & 2010.
7.	Dr. Muhammad Ilyas MMMTH D.I. Khan,	2012.
8.	Dr. Mir Dawud, AHQ Hospital Miranshah	1993, 1995, 1997, 1998, 2002 to 2012
9.	Dr. Shazia Mahmood BMC Mardan,	2011.
10.	Dr. Khial Zada AHQ Hospital Landi Kotal Khyber Agency.	2012
11.	Dr. Muhammad Fatooh, Bannu Medical College Bannu.	2012.
12.	Dr. Sajad Ahmad, RHC Khair Abad Nowshera.	2012.
13.	Dr. Sher Ali Khan, SGTH Swat.	11-3-95 to 31-12-1995, 01-01-1996 to 31-12-1996, 23-08-1998 to 31-12-1998, 2002, 2003, 2004, 2006, 2008, 2009 & 2010.
14.	Dr. Hazrat Mir, KCD Peshawar	2005, 2006, 2010 to 2012.

9/13

3
4/3
05

Enclosure

ATTESTED
[Signature]

ASAD JAN

High Court
CJ/MIC

Alam Zeb Khan

Attested
[Signature]
Ad To

14.	Dr. Hazrat Mir, KCD Peshawar	2005, 2006, 2010 to 2012
15.	Dr. Imdad Ullah, KCD Peshawar	15-09-2001 to 31-12-2001 & 2012
16.	Dr. Faria Hassan, Govt: LRH Peshawar.	28-8-1994 to 31-12-1994, 2000, 2003, 2004, 2008, 2009, 21-09-2010 to 31-12-2010 & 2012
17.	Dr. Shazia Nadeem, on deputation to Punjab.	2009, 2010 to 2012.
18.	Dr. Muhammad Saleh, RHC Lora Abbottabad.	25-8-1994 to 31-12-1994, 1995 to 2010 to 2012.
19.	Dr. Taj Muhammad, RHC Jawar Buner.	2012.
20.	Dr. Muhammad Ikram Ullah, DHQ: Hospital (LMH) Kohat.	2012.
21.	Dr. Snarfati Ali, RHC Bari Kot Swat.	2012
22.	Dr. Umar Shah, RHC Domel Bannu.	1997, 2011 & 2012.
23.	Dr. Syed Maqbool Shah, BMC Mardan.	2012.
24.	Dr. Iqbal-ud-Din, DHQ: Hospital Chitral	2012.
25.	Dr. Iftikhar Ahmad, RHC Garam Chishma Chitral.	01-02-1997 to 31-12-1997, 1998, 2001, 2010 to 2012.
26.	Dr. Syed Raiq Shah, KCD Peshawar	1999, 2011 & 2012.
27.	Dr. Alta-ur-Rahman CH, Topi Swabi.	01-02-1997 to 31-12-1997, 1998 to 2010 to 2012.
28.	DR. Huma Jabeen, BMC Mardan	2012.
29.	Dr. Muhammad Islam, RHC Sakhakot Malakand Agency.	01-01-1999 to 28-02-1999, 2010 to 2012.
30.	Dr. Muhammad Tariq, SGT, Swat	2012.
31.	Dr. Abdul Qadoos, BMC Bannu.	2012.
32.	D. Sartaj Ali Shah, DHQ: Hospital Swabi.	2012.
33.	Dr. Sher Bacha, DHQ: Hospital Daggar Buner.	2012.
34.	Dr. Gul Tayaz Khan, RHC Kakki Bannu	2009, 2010 to 2012.
35.	Dr. Ahmad Khan, BMC Mardan.	2011 & 2012.
36.	Dr. Amjad Yousaf, RHC Khanpur Haripur.	2000, 2010 to 2012
37.	Dr. Ijaz Rehman Ullah, DHQ: Hospital Haripur	2011 & 2012
38.	Dr. Muhammad Zameer, Govt, KCD Peshawar	29-08-2004 to 31-12-2004, 2009, 2010 to 2012.
39.	Dr. Bashir Rehman, KCD Peshawar	2009, 2011 & 2012
40.	Dr. Anwar Khan Wazir, KGMC Peshawar.	2012.

A part from the above the following documents may also be furnished in respect of each Dental Surgeons.

1. Passport size photographs. 10 copies.
2. No Departmental Judicial/Anti Corruption/enquiry certificate. 10 copies.

[Signature]
19.2
ASSISTANT DIRECTOR (P-I)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

OFFICE OF THE DIRECTOR HEALTH SERVICES FATA, PESHAWAR

No. 3797-98 /DHS/FATA

Dated 6 / 3 /2013

Copy of the above is forwarded to the:-

1. Agency Surgeon Khyber at Jamrud.
 2. Medical Superintendent Agency Headquarter Hospital Miranshah.
- For information and necessary action.

[Signature]
06/3
Director Health Services,
FATA, Peshawar.

DIRECTORATE OF HEALTH SERVICES FATA
FATA SECRETARIAT WARSAK ROAD PESHAWAR.

24

OFFICE ORDER:

Dr. Hidayat Ullah Dental Surgeon at CH Shalman is here by allowed to perform his duty at Civil Hospital Jamrud Khyber Agency till further orders. He will continue to draw his salary from his original post in the interest of public service with immediate effect.

Sd/-
Director Health Services,
FATA, Peshawar.

No _____ /FATA/Admn

Dated _____ /10/2008

Copy forwarded to the:-

1. Agency Surgeon Khyber at Jamrud.
2. Officer concerned

Director Health Services,
FATA, Peshawar.

ATTESTED



ASAD JAN
(Advocate High Court)
X-CJ/JMIO

Attested
Asad Jan
Advo

To,

The Chief Secretary,
NWFP Peshawar.

Subject: Reply to show Cause Notice

Dear Sir,

Most respectfully it is stated that I was working in Nizampur District Noshehra. I was transferred to Manshehra dated: 2.3.2005. I was ill and my wife is Chronic Schizophrenic patient and was also in pregnancy state. My children are studying in various schools of Peshawar University. Medical Certificates attached vide (Flag-A).

Hence in the circumstance, I made an appeal for posting in Peshawar instead of Manshehra. My request for transfer to Peshawar was acceded to and I was posted in KCD Peshawar (Flag-B).

For unknown reason the said order was cancelled and was posted in Shahbaz Ghari Mardan (Flag-C), where I assumed the charge on 25.3.2006, however in terms of Para XIV of the posting / Transfer policy dated: 15.2005. I submit an appeal against the cancellation order. In response to appeal which is a right of petitioner, I received a show cause notice and suspension order dated: 14.4.2006. It was alleged that I am reluctant to join duty at Shahbaz Ghari. While I was already performing duties since 25.3.2006. Arrival report copy attached (Flag-D).

It is therefore, requested that the show cause notice may kindly be withdrawn and I may be exonerated of the charge. I also wish to be heard in person.

ATTESTED

ASAD JAV
(Advocate High Court)
M-CI/JMIC

(Dr. Hayat ullah)
Dental Surgeon

Attested
Advo
Advo



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

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

OFFICE ORDER

Consequent upon Govt. Khyber Pakhtunkhwa Health Department letter No. SOH(EV)4-22/07 dated 22/02/2012 the following Dental Surgeons (BS-17) are hereby relieved of their duties w.e.f. 22/04/2013 to join the two months training at Category-A/ Teaching Hospitals/KCD, noted against each.

S.NO	Name of Doctors/Place of Posting.	Name of Institution.
1.	Dr. Hadayat Ullah RHC Lesh Shalman Khyber Agency.	KCD Peshawar.
2.	Dr. Faria Hassan LRH Peshawar.	LRH Peshawar.
3.	Dr. Muhammad Islam RHC Skha Kot Malakand.	DHQ: Hospital Mardan.

Sd/xxxxxx
Director General Health Services
Khyber Pakhtunkhwa.

No. 9019-26 IE-I

Peshawar the Dated: 23 /04/2013

Copy forwarded to the: -

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar for information.
2. Principal KCD Peshawar.
3. Director PHSA Peshawar.
4. DHS FATA Peshawar.
5. M.S Govt. LRH Peshawar.
6. DHO Malakand.
7. M.S DHQ: Hospital Mardan.
8. Agency Surgeon Khyber Agency.

For information and necessary action.

ATTESTED

ASAD JAN
Advocate High Court
Peshawar

ASSISTANT DIRECTOR (PH)
Directorate General Health Services
Khyber Pakhtunkhwa

Attested
Ado

(17)

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DISTRICT GOVERNMENT
OFFICE OF THE DISTRICT COORDINATION OFFICER MARDAN

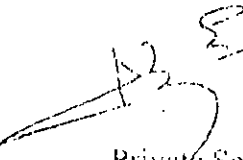
No. 1015-16 /DCO(M)
To:

Mardan, the 6th November, 2007

The P.S to
District Coordination Officer
Karak (the then D.C.O Mdn)

Subject: PER FOR THE YEAR 2006
Memo:

Please find enclosed herewith PERs duly reported upon by Executive District Officer Health Department Mardan for the subject period in the name of Dr. Hidayatullah Dental Surgeon, Mardan for countersigned of the respective tenure and onward submission to D.G Health Services NWFP Peshawar under intimation to this office.


Private Secretary to
District Coordination Officer Mardan.

✓ Copy to: Executive District Officer Health Department Mardan for information.

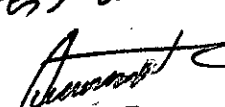
No. 14588/13 D.O. (H) dt 10/11/07
Dr. Hidayatullah Dental
Surgeon Rte. Shalbag
Karak Mardan

ATTESTED

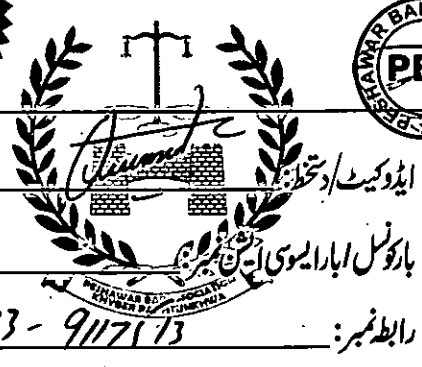
ASAD JAN

Advocate High Court
K-G/J/M/C


Attested


Adv

تہمت
10 روپے



47158

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

ایڈووکیٹ اور محققین
بار کونسل ابار ایسوسی ایشن
رابطہ نمبر: 0333 - 9117173

بعدالت جناب: سرورس ٹریبونل جج صاحب ۱۹۸۸ لٹھام

<p>منجانب: ایبلانٹ</p> <p>ڈاکٹر سید امین اللہ</p> <p>کوئٹہ</p>	<p>دعویٰ: سرورس ٹریبونل</p> <p>علت نمبر:</p> <p>موضوع:</p> <p>جرم:</p> <p>تھانہ:</p>
<p>بابت تحریر آنکہ</p>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام سیمیا میں کی گئی اسد جان اور کوکین سیمیا صاحبہ کے خلاف پشاور بار ایسوسی ایشن کی مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر حالت و فیصلہ برط دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں مدد تخط کرنے کا اختیار ہوگا، نیز بصورت جرم پیروی یا غیر ذمہ داری یا اہل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اہل نگرانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے تجا سے قرار کا اختیار ہو گا اور صاحب
 مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا مانتہ مدعا ختم منظور و قبول ہوگا دوران مقدمہ
 میں جو خرچہ ہر جانہ التوائے مقدمہ کے نتیجے سے ہوگا وہ وکیل موصوف و سول کے لئے کا مختار ہوگا کوئی تاریخ پیشی مقام
 دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی یا مدعا ختم کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

دستخط ایبلانٹ برائین اللہ

۱۹

المرقوم: ۱۹

الع ————— واہ شد ————— الع

مقام

شعبہ

Accepted

Accepted

نوٹ: اس وکالت نامہ کی ذمہ داری کا حامل قبول ہوگی۔

Before Hon,able Service Tribunal Peshawar

Dr. Hidayatullah

vs

Govt

Petition for adjournment

Petitioner submits as under:-

1. That the above titled case is pending before this Hon,able Court and fixed for today.

2. That the counsel for petitioner is busy in Supreme Court and would not be able to attend this Hon,able today.

It is, therefore requested that the above titled case may please be adjourned and fixed for some other suitable date.

Petitioner
through Hassan
Ade Hassan