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. 818/2012** (Bahadur Nawaz-vs- District Police Officer Hangu, and others). JUDGMENT
	02.11.2016	PIR BAKHSH SHAH , MEMBER: Counsel for the appellant (Safdar Iqbal Khattak, Advocate) and Mr. Muhammad Jan, GP alongwith Mr. Abdur Rehman, Inspector(legal) for respondents present. 2. Appointed as Constable in the police department, the appellant remained absent from duty for two years w.e.f 30.03.2009, therefore he was dismissed from service vide original order dated 12.04.2011. His first departmental appeal dated 16.12.2011 was rejected on 27.04.2012. He submitted a second departmental appeal dated 17.05.2012 which was rejected on 02.07.2012, hence this service appeal on 17.7.2012. 3. Arguments heard and record perused. 4. Learned counsel for the appellant submitted that the reason of absence from duty was that mother of the appellant was seriously ill therefore he could not come on duty. He further submitted that no charge sheet or statement of allegations was served on the appellant and the departmental enquiry was also conducted at his back. He argued that the

penalty is too harsh and as no opportunity of defense and hearing has been provided to the appellant therefore, the impugned orders may be set aside and the appellant reinstated into service with all beck benefits. To reply to the opposite arguments that the departmental appeals as well as service appeal both were badly time barred, the learned counsel further argued that he had submitted condonation of delay on the ground of illness of mother of the appellant, hence his service appeal may not be dismissed on the ground of limitation.

5. This appeal was resisted by learned G.P who submitted that original order was passed on 12.04.2011 against which first departmental appeal was moved on 16.12.2011 which was badly barred by time and rejected on 27.04.2012. That the appellant submitted second departmental appeal on 17.05.2012 which was also rejected on 02.07.2012. He argued that there is no provision of the second appeal in the law and rules and further that when the departmental appeal was also time barred so this service appeal before Tribunal is incompetent which cannot be entertained. He also argued that the appellant remained absent for sufficient long time without any leave application and his absence was a willful absence. He also stated that as the departmental appeal of the appellant has been rejected on the ground of limitation, therefore application for condonation of delay cannot be considered by this Tribunal. He submitted that the appeal may be dismissed with cost.

6. We have carefully perused the record and heard pro & contra arguments for the parties. It is not denied that the appellant remained absent from duty for two years. There is nothing on record to suggest that he had asked for any type of leave. Though he has appended certain medical papers which according to the appellant pertains to the illness of

his mother but the entire record does not reveal that the appellant was the only attendant of his mother nor that when his mother fell ill so how longer she remained bedridden. These facts were very important for a just decision. His first departmental appeal was also not within time and when a departmental appeal is rejected being time barred, so the service appeal may not be competent as laid down by the august apex court. No convincing ground duly supported by sufficient evidentiary materials in its support, have been adduced by the appellant to show that he had ample justification to remain absence from duty for two long years are that further the delay occasioned by him can be condoned in the circumstances. There is no merit in this appeal. The same is therefore, dismissed. Parties are left to bear their won costs. File be consigned to the record room.

(PIR BAKHSH SHAH)
MEMBER

(ABDUL LATIF)
MEMBER

ANNOUNCED
02.11.2016

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE, PESHAWAR

ORDER

This order is hereby passed to dispose off departmental appeal under Rule 11-a of Khyber Pakhtunkhwa Police Rule 1975 submitted by Ex-Driver FC Rizwan Ullah No. 1738 of CCP, Peshawar against the Punishment Order, i.e. dismissal from service passed against the appellant by SP/HQrs Peshawar vide OB No. 825 dated 13.03.2014.

In the light of recommendations of Appeal Board meeting held on 27.08.2015, the board examined the enquiry in detail & other relevant documents. It revealed that the appellant was served with Charge Sheet/Statement of Allegations and punishment order was announced on the basis of reply to the Charge Sheet and Statement of Allegations.

The official was called and heard in detail. Record perused. The said official was absented for the above period due to involvement in case FIR No. 687 dated: 30.07.2013 u/s 302/324/34 PPC PS Shana Wali Peshawar. His case was dispose off due to compromise in the court. The board accepted his appeal and his punishment of dismissal from service is converted into stoppage of increments for two years without accumulative effect. He is re-instated in service with no back benefits.

Order announced in the presence of appellant.

Sd/-
NASIR KHAN DURRANI
Inspector General of Police,
Khyber Pakhtunkhwa Peshawar.

No. 11331-34/E-IV dated Peshawar the 14.9.2015

Copy of above is forwarded to the:-

1. Capital City Police Officer, Peshawar. The service Roll, Fauji Misal and Enquiry File of the above named official are returned herewith.
2. PSO to IGP/Khyber Pakhtunkhwa Peshawar.
3. PA to Addl. IGP/HQrs Khyber Pakhtunkhwa, Peshawar.
4. PA to DIG/HQrs Khyber Pakhtunkhwa, Peshawar.

(NASIR KHAN DURRANI)
AIG/Establishment
For Inspector General of Police
Khyber Pakhtunkhwa Peshawar.

Grievy documents/Decuments/Grievy/Fistatement orders.docx

818/2012

08.04.2016 Counsel for the appellant and Mr. Abd-Ur-Rehman, Inspector alongwith Asst: AG for respondents present. Enquiry report produced by the respondent-department copy of which is handed over to the learned counsel for the appellant who requested that time may be granted to him to go through the enquiry report. The case is adjourned. To come up for arguments on 04.07.2016.

Member Member

04.7.2016 Clerk of counsel for the appellant and Asstt. AG alongwith Abdur Rahman, Inspector (Legal) for the respondents present. Learned counsel for the appellant is not in attendance. Requested for adjournment. Adjourned for final hearing to 02.11.2016 before D.B.

Member Chairman

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3
~~حفظ~~		~~31-12-2010~~
ایاز نواز	Cost :	12-4-2011
		Absence 30-3-2009
	D.A :	16-12-2011 // 21-4-2012
	Final	17-5-2012 — 2-7-2012
		13-2009 SCMR 1121
		2013 " 911
		2009 " 1435
		2011 " 676

on limitation.

NWFP J.(Criminal) No. 209

GS&PD.NWFP.—327—FS—2000 Pads of 100—10.10.2003—(10)/Disk-10

FORM "A"

FORM OF ORDER SHEET

Court of.....

Case No.....of.....

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3

01.10.2015 Counsel for the appellant and Mr. Farman, ASI alongwith Mr. Muhammad Jan GP for respondents present. Arguments could not heard due to shortage of time. To come up for arguments on 22-12-15.

Member Member

22.12.2015 Counsel for the appellant and Mr. Abdul Rehman, Inspector (Legal) alongwith Mr. Ziaullah, GP for respondents present. During the course of arguments report of the enquiry conducted against the appellant was not found on record. Respondent-department is directed to produce copy of the same on next date. To come up for further arguments on 8.4.2016

Member Member

9.6.2014 Appellant with counsel and Mr. Riaz Muhammad, ASI Hangu on behalf of respondents with AAG present. Arguments could not be heard because representative of the respondents stated that he could not timely handed over record of the case to the learned AAG. Perusal of file revealed that the respondents have also not filed reply to application for condonation of delay. Reply to application for condonation of delay be filed in the meantime for arguments, particularly on the question of limitation in view of the departmental appeal having been declared time barred by the departmental appellate authority, on 25.11.2014.

Chairman

25.11.2014 No one is present on behalf of the appellant. Mr. Aslam, Inspector (legal) on behalf of respondents with Mr. Muhammad Adeel, Advt, ADS present. The Tribunal is incomplete. To come up for further proceedings on 11.5.2015

Reader

11.05.2015 Counsel for the appellant and Mr. Ziaullah, GP with Fazal Muhammad, ASI for the respondents present. Counsel for the appellant requested for adjournment. Therefore, case is adjourned to 01.10.2015 for arguments.

MEMBER MEMBER

29.3.2013 Appellant with counsel and Mr. Azizur Rehman, Inspector (Legal) on behalf of the respondents with Mr. Noorullah, SGP present. Written reply received on behalf of the respondents, copy whereof is handed over to the learned counsel for the appellant for rejoinder on 11.6.2013.

Member Member

11.6.2013 No one is present on behalf of the appellant. Mr. Aziz-ur-Rehman, DSP (Legal) for the respondents with Mr. Muhammad Jan, GP present. Rejoinder has not been received. Another chance is given for rejoinder on 27.9.2013.

Chairman

27.9.2013 Appellant with counsel and Mr. Ibrahim Asghar, Inspector Legal for respondents with AAG present. Rejoinder has not been received, and request for further time made on behalf of the appellant. A last chance is given for rejoinder on 15.1.2014.

Chairman

15.01.2014 Appellant with counsel and Mr. Muhammad Aslam, Inspector on behalf of respondents with AAG present. Rejoinder received on behalf of the appellant, copy whereof is handed over to the learned AAG for arguments on 9.6.2014.

Chairman

Appeal No. 818/2012.
Bahadur Nawaz.

4. 11.10.2012 Counsel for the appellant, and Mr. Shakirullah AGP alongwith Azizur Rehman L.O for the respondents present. Counsel for the appellant heard on preliminary. Contended that the appellant has not been treated in accordance with the law/rules. The appellant has been dismissed from service vide the impugned order dated 12.4.2011, without fulfilling the legal requirements as required under the law/rules. The appellant preferred a departmental appeal but the same has been rejected on 21.04.2012. Counsel for the appellant has also submitted an application for condonation of delay in filing the appeal. Points raised at the bar need consideration. The appeal is admitted to full hearing, subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Case adjourned to 8.1.2013 for submission of written reply on main appeal as well as reply/arguments on application.

Member.

Appellant deposited Security & Process fee Rs 200/- Bank receipt is attached with file

5. 11.10.2012 This case be put before the Final Bench I for further proceedings.

Member

8.1.13 Appellant Present in Person. Mr. Najeeb-ur-Rehman Inspector (Legal) for respondents Present. The Learned Bench is on Tours therefore case is adjourned to 29.3.13.

Reader

3. 29.8.2012 Counsel for the appellant present. The appellant has been dismissed from service vide order dated 12.4.2011 on the ground of absence from duty, against which he preferred a departmental appeal on 21.4.2012. His representation was also rejected on 2.7.2012. In this case the appellant has himself admitted his absence from duty. Notice be issued to the AAG/Respondents to produce the record whether the respondents have tried to contact the appellant to associate in the inquiry proceedings or not. Only this point will be considered. To come up for preliminary hearing on 11.10.2012.

MEMBER

N[illegible] (Criminal) No. 209

GS&PD.NWFP.—327—FS—2000 Pads of 100—10.10.2003—(10)/Disk-10

FORM "A"

FORM OF ORDER SHEET

Court of.....

Case No. 818 /2012 .....of.....

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3
1-	17/07/2012	The appeal of Mr. Badadur Nawaz presented today by Mr. Saffadar Iqbal Khattak Advocate, may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing. REGISTRAR
2-	20-7-2012.	This case is entrusted to Primary Bench for preliminary hearing to be put up there on 29-8-2012. CHAIRMAN

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3

IN THE SERVICE TRIBUNAL ,K.P.K PESHAWAR

Service Appeal No. 818 /2012

Bahadur Nawaz .....***Appellant***

-Vs-

District Police Officer Hangu and others.....***Respondents***

INDEX

S.NO	Description Of Documents	Annex	Pages
1	Service Appeal alongwith affidavit		
2	Condonation of Delay alongwith affidavit		
3	Addresses of Parties		
4	Copy of order	A	10
5	Copy of departmental appeal & order	B	11
6	Copy of Representation	C	12-17
7	Wakalatnama		18

Appellant

Through

Safdar Iqbal Khattak

Advocate Peshawar

Dated: 17.07.2012

IN THE SERVICE TRIBUNAL ,K.P.K PESHAWAR

Service Appeal No. 818 /2012

[redacted] 810
17-07-12

Bahadur Nawaz S/o Iraq Badshah
Constable No. 182/94 R/o Kotki, District Hangu.....***Appellant***

-Vs-

1. District Police Officer Hangu.
2. Deputy Inspector General Police Kohat Region Kohat.
3. Deputy Superintendent of Police Hangu...
4. Provincial Police Officer K.P.K Peshawar..... ...***Respondents***

SERVICE APPEAL U/S 4 OF K.P.K SERVICE TRIBUNAL ACT 1974 AGAINST THE DISMISSAL ORDER DATED 12-04-2011

Prayer in Appeal:

On acceptance of this service appeal, the impugned order dated 12-04-2011 passed by the respondent No.1 may kindly be set aside in the appellant may graciously be reinstated in his service with all back benefits

Respectfully Sheweth:

1. That the appellant was appointed as "Constable in Police Department" on 18-09-2004 at Hangu.
2. That the appellant performing his duties regularly and due to the illness of her mother, the appellant unable to perform his duty for some time.
3. That respondent No.1 issued order to dismiss the appellant from his service on 12-04-2011 ***(Copy of order is attached as annexure A).***
4. That the appellant filed a departmental appeal before the respondent Np.2 which was also turn down on 21-04-2012 ***(Copy of the appeal & order is attached as Annexure B).***

[redacted] 17/7/12

5. That the appellant filed the representation for re-instatement before the respondent No.2 which was also turn down on 02-07-2012 ***(Copy of the representation for re-instatement in order dated 02-07-2012 is attached as Annexure C).***

6. That the appellant is aggrieved from the order dated 12-04-2011, 21-04-201 & 02-07-2012 and come to this Hon,ble Tribunal inter alia on the following grounds.

GROUNDS:

A. That the impugned orders are incorrect based on malafide intentions, against the facts, circumstances of the case and against the principles of natural justice.

B. That the order passed by respondent No.1 is highly illegal and unlawful.

C. That the appellant performed his duty regularly and was efficient and punctual constable of police during his service.

D. That prior to final sow cause notice, no charge sheet, and show cause notice was served upon the appellant.

E. That no inquiry against the appellant was conducted and if any inquiry was conducted that would be one sided inquiry, because the appellant was not served with any show cause notice nor any explanation has been called from appellant nor any statement of allegation was sent to him and as such the appellant was condemned unheard.

F. That the absence of appellant from his service was not deliberate and intentional but due to some urgent and unavoidable reasons i.e. treatment of her mother (Medical documents are attached as annexure).

G. That the appellant was appointed in 18-09-2004 and joined his duty vide daily dairy. And since that he has served the department to the entire satisfaction of all concerns and superiors and there is no complaint against him.

H. That any other ground will be taken at the time of argument with the kind permission of this Hon,ble Tribunal.

It is, therefore, humbly prayed that on acceptance of this appeal,. this Hon,ble Tribunal may kindly be set aside the impugned order dated 12-04-2011passed by respondent No.1 and order dated 21-04-2012 passed by the respondent No.2 and order dated 02-07-2012 passed by the respondent No.3 and the appellant may kindly be reinstated into his service with all back benefits.

Dated: 17-07-2012

Appellant

Through

Safdar Iqbal Khattak

Advocate Peshawar.

AFFIDAVIT:

I Safdar Iqbal Khattak Advocate High Court, as per instruction of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon,ble Tribunal.

ATTESTED
KHALID MAHMOOD ADVOCATE
OATH COMMISSIONER
PESHAWAR HIGH COURT

17-7-12

DEPONENT

(4)

IN THE SERVICE TRIBUNAL ,K.P.K PESHAWAR

Service Appeal No._____/2012

Bahadur Nawaz .....***Appellant***

-Vs-

District Police Officer Hangu and others.....***Respondents***

APPLICATION FOR CONDONATION OF DELAY

Humbly sheweth:

1. That the above appeal is pending before this Hon,ble Tribunal and no date of hearing has yet been fixed.
2. THAT the appeal of the appellant as time barred due to the illness of her mother in cannot filed the appeal against the impugned order before this Hon,ble Tribunal.
3. That the delay of the filling of the appeal of the appellant is not deliberately nor intentionally but due to the aforementioned reason.
4. That is according to the decision of the superior courts the case is decided neither on merit nor on the technicalities.

It is therefore humbly prayed that on acceptance of this application the appeal of the appellant may kindly be condoned and decided on merit.

Appellant
Through

Dated: 17-07-2012.

Safdar Iqbal Khattak
Advocate Peshawar

IN THE SERVICE TRIBUNAL ,K.P.K PESHAWAR

Service Appeal No._____/2012

Bahadur Nawaz .....***Appellant***

-Vs-

District Police Officer Hangu and others.....***Respondents***

AFFIDAVIT:

I Safdar Iqbal Khattak Advocate High Court, as per instruction of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon,ble Tribunal.

17-7-12

ATTESTED
WALID MAHMOOD ADVOCATE
OATH COMMISSIONER
PESHAWAR HIGH COURT

DEPONENT

(6)

IN THE SERVICE TRIBUNAL ,K.P.K PESHAWAR

Service Appeal No._____/2012

Bahadur Nawaz .....***Appellant***

-Vs-

District Police Officer Hangu and others.....***Respondents***

ADDRESSES OF THE PARTIES

APPELLANT

Bahadur Nawaz S/o Iraq Badshah
Constable No. 182/94 R/o Kotki, District Hangu.

RESPONDENTS:

1. District Police Officer Hangu.
2. Deputy Inspector General Police Kohat Region Kohat.
3. Deputy Superintendent of Police Hangu.

Dated: 17.07.2012.

Appellant
Through
Safdar Iqbal Kahttak
Advocate Peshawar

(8)

POLICE

Name: _____

Designation CONSTABLE

Distt. _____

Issuing Authority _____

F/Name [illegible]

N.I.C. No. : 4140[illegible]-2535734-1

Date of Appointment : 18-04-2004

Identification Mark : TT

Height : 5' 0¼ Eyes : [illegible] Bld: Grp: [illegible]

Date of Issue : 06-06-2-07 S.No : 16[illegible]

(10)

Annex (A)

ORDER

This order of mine will dispose off the departmental enquiry ini against Driver Constable Bahadur Nawaz No. 182/94 on the basis of allegations he while posted at Police Lines Hangu, he was proceeding on two days casual leav failed to report back and absented himself from official duty with effect 30.03.2009 till now without any leave or prior permission.

He was served with Charge Sheet together with Stateme Allegations, to which he failed to submit his reply. Inspector Gul Sarwar, RI Lines, Hangu and SI Amirullah, Lines Officer, Hangu were constituted as En Committee to conduct departmental enquiry against him under K.P.K Removal Service (SPECIAL POWERS) Ordinance 2000. After completion of enquiry, the en committee submitted his findings on 07.04.2011, time and again the defaulter Constable Bahadur Nawaz No. 182/94 was summoned but neither has he app before the enquiry committee for enquiry proceeding nor submitted his reply Charge Sheet. There is no hope that he will join police department and earn mon his private vehicle, the said defaulter Constable absented himself from official without any leave or prior permission with effect from 30.03.2009 till now. There the enquiry committee recommended him for major punishment of Dismissal Service from the date of his absence i.e 30.03.2009.

Keeping in view of the above and having gone through ava record, the undersigned has come to the conclusion that the defaulter Constable to appear and defend himself, which indicates that he was not interested to further. Moreover, in these circumstances his retention in Police Department is bu on public exchequer, therefore, I, Abdur Rashid, District Police Officer, Hang exercise of the powers conferred upon me, awarded him major punishment of Dism from Service from the date of his absence.

Order Announced.

OB No. 199

Dated 12/4/2011.

(ABDUR RASHID)
DISTRICT POLICE OFFICER,
HANGU

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU.

No. 1879-83/PA, dated Hangu, the 13/04/2011.

Copy of above is submitted to the Dy: Inspector General of P Kohat Region, Kohat for favour of information please.

2. Pay Officer, Reader, SRC and OASI for necessary action.

(ABDUR RASHID)
DISTRICT POLICE OFFICER,
HANGU

(11)

Anex (B)

بحضور جناب DIG صاحب کوہاٹ ریجن کوہاٹ۔

جناب عالی!

گزارش ہے کہ سائل 2004ء میں بطور کنسٹیبل ضلع ہنگو میں بھرتی ہوکر نہایت خوش اسلوبی سے ڈیوٹی سرانجام دے رہا تھا۔ اور افسران بالا کو کسی قسم کی شکایت کا موقع نہیں دیا تھا۔ سائل کا ماضی بے داغ ہے۔ لیکن بدوران سروس سائل کی والدہ صاحبہ بیمار ہوکر اور کچھ گھریلو مسائل اور تکلیفات کی وجہ سے سائل نوکری کرنے سے قاصر رہا۔ اب سائل کی والدہ صاحبہ بھی صحت یاب ہیں۔ اور گھریلو مسائل بھی حل ہو چکے ہیں۔ سائل دوبارہ اپنی نوکری کرنا چاہتا ہے۔ اور انشاءاللہ آئیندہ بھی افسران بالا کو کسی قسم کی شکایت کا موقع نہیں دے گا۔

بذریعہ درخواست استدعا ہے۔ کہ سائل کو دوبارہ محکمہ پولیس میں بطور کنسٹیبل بحال کرنے کا حکم صادر فرمایا جائے۔ سائل اور سائل کے والدین تازیست دُعا گو رہیں گے۔ (نوٹ:- کاغذات میڈیکل والدہ صاحبہ، کاغذات ڈسچارج لف درخواست ہذا ہیں)۔

عین نوازش ہوگی

مورخہ 16.12.2011

العارض

کنسٹیبل بہادر نواز نمبر 182/94 ولد عراق بادشاہ سکنہ کوٹکی ہنگو۔

No 10176 /EC

Dt. 16-12 /2011

For Needed to D.P.O

Hangu for Comments alongwith Service Record Please.

POLICE DEPARTMENT

(12)

Annex (C)

KOHAT REGION.

ORDER.

This or order is passed on application submitted by Ex constable Bahadar Nawaz No. 182/94 of Hangu district against the order of District Police Officer, Hangu, vide which he was dismissed from service form the date of his absence.

Facts arising of the case are that the applicant while posted at Police lines Hangu had proceeded on 02 days causal leave, but did not turn up and absented himself from duty with effect from 30.03.2009. He was proceeded departmentally under the NWFP Removal from Service (Special Powers)Ord: 2000 by the DPO, Hangu. An enquiry committee comprising of Reserve Inspector and lines Officer Police Lines Hangu was appointed to scrutinize the conduct of the defaulter constable(applicant). He deliberately did not submit reply to the Charge Sheet, nor joint the enquiry proceedings till its disposal. After completion of all codal formalities the applicant was dismissed from service by the competent authority(DPO, Hangu) vide his office OB No. 199, dated 12.04.2011.

Aggrieved from the above order, the applicant preferred the said application on 16.12.2011.

The applicant was heard in person during orderly room held on 18.04.2012 and record perused.

The applicant failed to explain his conduct as well as defend himself.

Perusal of record revealed that the applicant remained absent from duty from a long period(about 02 years) i.e with effect from 30.03.2009 till the disposal of enquiry proceedings initiated against him as well as did not join the proceeding to defend himself. Record further revealed that he also remained absent from duty on two other occasion. The conduct of the applicant transpired, he is not desirable to retain in a disciplined force. Further more the application is contrary to law, badly delayed, hence dismissed.

(MOHAMMAD IMTIAZ SHAH)
PSP, QPM
Dy: Inspector General of Police,
Kohat Region, Kohat.

No. 3724-25/EC, dated Kohat the 21-4 /2012

Copy to District Police Officer Hangu for information w/r to his Memo: No. 5633/Insp:/Legal, dated 31.12.2011.

2. Ex constable Bahadar Nawaz S/O Iraq Badshah R/O Kotki Teh: & District Hangu.

(MOHAMMAD IMTIAZ SHAH)
PSP, QPM
Dy: Inspector General of Police,
Kohat Region, Kohat.

(13)

[illegible] صاحب I.G.P آف پولیس خیبر پختونخوا پشاور

عنوان: [illegible] برائے بحالی سروس

IMMEDIATE

جناب عالی!

[illegible] گذارش ہے کہ سائل نے جناب ڈسٹرکٹ پولیس آفیسر ہنگو کے آرڈر نمبر 1379-93/PA مورخہ 13.04.2011 کو درخواست کیا تھا۔ سائل 2004ء میں بطور کنسٹیبل بھرتی ہو کر نہایت خوش اسلوبی کے ساتھ [illegible] بدوران سروس آفیسران بالا کو کسی قسم کی شکایت کا موقع نہیں دیا تھا۔ سائل کا [illegible] بدوران سروس سائل کے والد صاحب بیمار ہوئے اور کچھ گھریلو مسائل اور تکالیف کی وجہ سے سائل نوکری کرنے سے قاصر رہا۔ اب سائل کی والدہ [illegible] بھی ہیں اور گھریلو مسائل بھی ہو چکے ہیں، دوبارہ اپنی نوکری کرنا چاہتا ہے اور انشاء اللہ آئندہ کسی آفیسران کو بالا کو کسی قسم کی شکایت کا موقع نہیں دونگا۔ سائل کے والد صاحب کے میڈیکل کا غرات لف ہے۔

لہذا بذریعہ درخواست استدعا کرتا ہے۔ کہ سائل کے موجودہ حالات کو مدنظر رکھتے ہوئے سائل کو محکمہ پولیس میں بحالی کے مناسب احکامات صادر کرا منظور فرمائیں تاکہ سائل کی معاشی الجھنوں کی تشفی ہو سکے۔ سائل اور سائل کا خاندان آپ صاحبان کے لئے دعا گو اور مشکور و ممنون رہے گا۔

عین نوازش ہوگی

مورخہ 17-5-2012

[illegible]

الراقم

سابق کانسٹیبل بیج نمبر 182/94

[illegible]

IMMEDIATE

CHIEF MINISTER
KHYBER PAKHTUNKHWA

(14)

To

The Dy: Inspector General of Police
Kohat Region, Kohat

No. 2721 /LB, dated Hangu the 11/06/2012.

Subject: **REPRESENTATION FOR RE-INSTATMENT**

Memo:

Kindly refer to your office No.4979/EC dated,30.05.2012.

It is submitted that Ex-Constable Bahadar Nawaz No.182/94 of district Hangu has filed representation application for his re-instatement before Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.

Fact arising of the case are that the applicant while posted at Police Lines Hangu had proceeded on 02 days casual leave, but did not turn up and absented himself from duty with effect from 30.03.2009. He was proceeded departmentally under the NWFP Removal from Service (Special Powers) Ord:2000 by the DPO, Hangu. An enquiry committee comprising of Reserve Inspector and lines Officer Police Lines Hangu was appointed to scrutinize the conduct of the defaulter constable(applicant). He deliberately did not submit reply to the Charge Sheet, nor join the enquiry proceeding till its disposal. After completion of all codal formalities the applicant was dismissed from service by the competent authority(DPO,Hangu) vide his office OB No.199, dated 12.04.2011.

Aggrieved from the above order, the applicant preferred appeal before the next high authority on 16.12.2011.

Perusal of record revealed that the applicant remained absent from duty for a long period (about 02 years) i.e with effect from 30.03.2009 till the disposal of enquiry proceedings initiated against him as well as did not join the proceeding to defend himself. Record further revealed that he also remained absent from duty on two other occasion. The conduct of the applicant transpired that he is not desirable to be retained in a disciplined force.

His application being legally defective, devoid of merit and badly time barred was accordingly dismissed by your good office vide No.3724-25/EC dated 21.04.2012.

The applicant has furnished lame excuses in his application which are totally irrelevant.

(15)

Phone No: 9260112.
Fax No: 9260114.

From: - The Dy: Inspector General of Police
Kohat Region, Kohat.

To: - The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. 5715 /EC Dated Kohat the 20 / 06 /2012.

Subject:- **REPRESENTATION FOR RE-INSTATEMENT**

MEMORANDUM.

Kindly refer to your office Endst: No. 10596/E-II, dated 25.05.2012.

It is submitted that Ex constable Bahadar Nawaz No. 182/94 of district Hangu has filed representation for his re-instatement before Provincial Police Officer Khyber Pakhtunkhwa Peshawar.

Fact arising of the case are that the application while posted at Police Lines Hangu had proceeded on 02 days causal leave, but did not turn up and absented himself from duty with effect from 30.03.2009. He was proceeded departmentally under the NWFP Removal from Service (Special Power Ord: 2000 by the DPO, Hangu. An enquiry committee comprising of Reserve Inspector and Lines Officer Police Lines Hangu was appointed to scrutinize the conduct of the defaulter constable (applicant). He deliberately did not submit reply to the Charge Sheet, nor join the enquiry proceeding till its disposal. After completion of all codal formalities the applicant was dismissed from service by the competent authority (DPO Hangu) vide his office OB No. 199, dated 12.04.2011.

Aggrieved from the above order, the applicant preferred appeal to the undersigned on 16.12.2011.

Perusal of record revealed that the applicant remained absent from duty for a long period (about 02 years) i.e with effect from 30.03.2009 till the disposal of enquiry proceedings initiated against him as well as did not join the proceeding to defend himself. Record further revealed that he also remained absent from duty on two other occasion. The conduct of the applicant transpired that he is not desirable to be retained in a disciplined force.

His application being legally defective, devoid of merit and badly time barred, was accordingly dismissed by this office vide No. 3742-25/EC, dated 21.04.2012.

The applicant has furnished lame excuses in his application which are totally irrelevant.

The representation filed by the applicant is legally defective, without substance, devoid of merit, badly time barred and fit to be filed please.

Encl: (Service Record & Fuji Missal)

Dy: Inspector General of Police,
Kohat Region, Kohat.

No. _____/EC

Copy to District Police Officer, Hangu for information w/r to his Memo: No.2721/LB, dated 11.06.2012.

Dy: Inspector General of Police,
Kohat Region, Kohat.

(17)

From : The Provincial Police Officer,
Khyber Pakhtunkhwa.
Peshawar.

To : The Deputy Inspector General of Police,
Kohat Region, Kohat.

No. 13278 /E-II dated Peshawar the 02 / 7 /2012.

Subject: **REPRESENTATION FOR RE-INSTATEMENT**

Memo:

Please refer to your office Memo: No. 5715/EC, dated: 20.06.2012.

The case of Ex-Constable Bahadar Nawaz No. 182/94 of District Police Hangu has been examined & filed by the competent authority, being time barred.

The Region chief has already filed his appeal. There is no provision in the rules for second appeal/representation.

The Service Record & Fauji Missal of the above named Ex-FC received with your Memo under reference is returned.

Fil SR & Fauji Missal

AIG/ESTABLISHMENT
For Provincial Police Officer,
Khyber Pakhtunkhwa.
Peshawar.

No 6207 /EC
9 5/12 /12
Copy of above with encl. is forwarded to DPO/Hangu for inf. & n/a. Encl. to make entries in his SR Records please

DIG POLICE
KOHAT
4/7/12

E:\My Documents(2)\E-II-3(2)\bahadar nawaz.doc

DR. MOHAMMAD SAEED

M.B.B.S, D.CARD

HEART SPECIALIST

DIVISIONAL HEADQUARTER HOSPITAL KOHAT.

☎ 0922-511175

(18)

Pt's Name Habib Jan Age 55 Sex M Date 7/3/22

Clinical Record

BP 120/90

Adm [illegible]

[illegible]

CCP

TC

TC

TC

CCP

CCP

TC

TC

تعطیل بروز جمعہ

NOT VALID FOR COURT

(19)

Dr. Multan Khan Orakzai
M.B.B.S. M.U.S.P.
G.P. & Ultrasound Specialist
Clinic: MEHMOOD MEDICOSE
Near Bab-al-Madina, Thall Road Hangu
Mob: 0333-9678010

هوالشافی

(17)

ڈاکٹر ملتان خان اورکزئی
ایم۔بی۔بی۔ایس،ایم۔یو۔ایس۔پی
جی۔پی/الٹراساؤنڈ سپیشلسٹ
کلینک: محمود میڈیکوز نزد باب المدینہ، ٹل روڈ ہنگو

Name Mo Nawaz Age Old Sex M Date 11-6-11

Clinical Record

Bil. Hub Pw

/

Temp 99°F
BP 150/90

/

Check Hbd) Clin

/

Rx

Tab Rowell 200 — (2)
1-0-1

Tab Amoxicillin 500 — (2)
1-0-1

Tab. Antacid forte — (2)
1-0-1

Citra Seeds Sachets — (2)
1-0-1

/

(2)

Dr. Multan Khan Orakzai
M.B.B.S M.U.S.P
P. & Ultrasound Specialist
Clinic: MEHMOOD MEDICOSE
Near Bab-al-madina, Thall Road Hangu
Mob: 0333-9193960

هوالشافی

ڈاکٹر ملتان خان اورکزئی
ایم۔بی۔بی ایس،ایم۔یو۔ایس۔پی
جی۔پی/الٹراساؤنڈ سپیشلسٹ
کلینک: محمود میڈیکوز نزد باب المدینہ، ٹل روڈ ہنگو

Name: M/o U. Nawaz Age: Old Sex: F Date: 11-6-21

ABDOMINAL ULTRASOUND EXAMINATION

LIVER	Size Normal ✓ Enlarged	Parenchyma Normal ✓ Fatty Focal	Bile Duct Normal ✓ Dilated	
GALL BLADDER	Size Normal ✓ Enlarged	Calculi Absent ✓ Present	Wall Normal ✓ Thickened	Not visualized
PANCREASE	Size Normal ✓ Enlarged	Paronchyma Normal ✓ Abnormal Focal Lesin		
SPLEEN	Size Normal ✓ Enlarged	Parenchyma Normal ✓ Abnormal		
KIDNEYS	Right Kidney Size Normal	Left Kidney Size Normal	Parenchyma Rk Lk / Normal	Calculi Rk Lk ? Wid. cure.
URINARY BLADDER	Empty Full ✓	Calculi Absent ✓ Present Focal Lesion	Wall Normal ✓ Thickened	
PROSTATE SIZE	Normal ✗	Enlarged ✗		
ASCITES	Present	Absent ✓		

Comments: - No U/S Study

Signature

(21)

OUTDOOR REFERE FORM TO FAUJI FOUNDATION HOSPITAL PESHAWAR / RAWALPINDI

Patients Name HABIB SULTAN W/O, D/O, S/O Ex No 40318

Rank SUBMAJ Name IRAB BAD SHAH Unit: EME Age 62 Years

Date: 12-7-10 2011

Address
Village: ~~Koki~~ Koiki
P.O: Hangu
Tehsil: Hangu
District: Do

Disease:

Clinical Note

C/o Chest Pain

A HTN, IHD, Bunny Michinta

Reff. to FFH Peshawar

Cardiologist → Medical Spec. Advice

Medical Officer Incharge
MS I.E.E. Kohat

FAUJI FOUNDATION HOSPITAL PESHAWAR

(22)

WIMS990

DEPARTMENT OF CARDIOLOGY
ECHOCARDIOGRAPHY REPORT

Dated: 13-APR-2010

Req Num 2989 Reg Num A40318-1 Patient Name HABIB SULTAN Unit EME
Age 62 Gender FEMALE Rank S/M

Diagnosis

Axis: Normal RVH: No LVH: No RBBB: No LBBB: No INFARCT:

Structure	Value	Normal Range
AORTA	32	20 - 31 mm
LT.ATRIUM	34	19 - 40 mm
L.V.E.D	44	36 - 56 mm
L.V.E.S	30	20 - 35 mm
R.V.E.S	23	7 - 23 mm
I.V.S THICKNESS	11	7 - 11 mm
P.W. THICKNESS	11	7 - 11 mm
Ejection Fraction	59	Ejection 50-75%
Shortening Fraction	31	Shortening 25%
M.V.E.E. Slope		70 - 150 mm/sec
M.V. (D.E.) Excursion		18 - 35 mm
M.V.E.S.D		10 mm
AO. Cusp Seperation		15 - 26 mm

Values
M.V
T.V
A.O.V
P.V

Walls
I.V.S MOTION
P.W MOTION
SEG. WALL MOTION

Misc.
ASD
VSD
PE
THROMBUS

COMMENTS:
NORMAL SIZE CARDIAC CHAMBERS.
NORMAL GLOBAL LV SYSTOLIC FUNCTION.
NO REGIONAL WALL MOTION ABNORMALITY AT REST.
VALVES ARE NORMAL IN STRUCTURE.
NO CLOT OR PERICARDIAL EFFUSION.
CONCLUSIONS:
NORMAL GLOBAL LV SYSTOLIC FUNCTION.

Technician

Dr. Shahzad K. Bangash
M.B.B.S. D. Card
Cardiologist
CARDIOLOGIST
F.F.H. Peshawar

ڈاکٹر صاحب علی

ایم بی بی ایس، ڈی ٹی سی ڈی (پاک)

ڈپ کارڈ (لندن)

ماہر امراض قلب، بلڈ پریشر، سینہ، ٹی بی

کلینک: بنگش پلازہ تیراہ بازار، کوہاٹ۔ فون: 516261

بہرام میڈیکل سنٹر، کوہاٹ۔ فون: 512747

23

2 8 MAR 2010

حبیب سلطان

(AH).

cc Bustic, Actim, Disprol, Arzi Sol

C/o Cough, D of

Bp. 180/7mm Adv. CXR PA view

BSR, S. Chol

Rp.

Tab. Mexpot / Mio Mec

Gm P

Zns. APSoni Zap

Zns. Lasoride

Zt. Acefyl

Zt. Relten

دونوں کو نرم پانی میں حل

(24)

...nical Laboratory
...aza Teerah Bazar Kohat.

اورکزئی کلینیکل لیبارٹری
بنگش پلازہ تیراہ بازار کوہاٹ

...ent's Name:- حبیب سلطان
...ge _____ Sex F Date 28/03/10
Test Required RBS, S. Cholestrol

BIO-CHEMISTRY			
TEST	UNITS	RESULT	NORMAL RANGE
Glucose F	mg/dl		60 – 110 mg%
Clucose R	mg/dl	94	Upto 180 mg%
HEPATIC PROFILE			
Bilirubin Total	mg/dl		Upto 1.0 mg%
Bilirubin Direct	mg/dl		0.25 mg%
Bilirubin Indirect	mg/dl		0.1 to 0.5 mg%
SGPT (ALT)	u/l		Upto 40 u/l
Alkaline Phosphatase	u/l		10 – 275
RENAL PROFILE			
Urea	mg/dl		10 – 50 mg%
Creatinine	mg/dl		Upto 1 – 2 mg%
Urid Acid (Urates)	mg/dl		M 3.4-7.0 F 2.4-5.7
OIPID PROFILE			
Cholesterol		157	100 – 240
MISCELLANEOUS			
Calcium	mg/dl		8.1 – 10.4

INCHARGE LAB

(25)

Dr. Abdul Hanan

Medical Specialist & Endoscopist
M.B.B.S, R.M.P

I.M.M (Medicine), FCPS (Medicine)
Ex: Registrar Medical Unit 2
(Banazir Bhatto Hospital Rawalpindi)
Ex: Assistant Incharge Endoscoy & Liver Center
(Banazir Bhatto Hospital Rawalpindi)

Habib Sultan SJT 16/10/10

known
HTN.

c/o
Acute chest pain.
No fever N
cough.

O/E
Euc
P 70
BP 170/75
Sp[illegible]

℞

Tab Osteoloc 1+1 7SY
x 3 دن کھانا

Syp Gaviscon 4ml
7 دن کھانا 2+2+2

Tab Cansel 1 رمضان 5SY
جاری

Tab Loprin 1 رمضان 7SY
جاری

Tab Sutsen 2 1 رمضان
4 ہفتے

سابقہ رجسٹرار اور اسسٹنٹ انچارج میڈیکل یونٹ 2
اینڈوسکوپی سنٹر، بے نظیر بھٹو ہسپتال راولپنڈی

میڈیکل سپیشلسٹ اینڈ اینڈوسکوپسٹ
سول ہسپتال ہنگو

ڈاکٹر عبد الحنان
ایم بی بی ایس، آئی ایم ایم (میڈیسن)
ایف سی پی ایس (میڈیسن)

(26)

ڈاکٹر مصاحب علی

ایم بی بی ایس، ڈی ٹی سی ڈی (پاک)

ڈپ کارڈ (لندن)

ماہر امراض قلب، بلڈ پریشر، سینہ، ٹی بی

کلینک: بنگش پلازہ تیراہ بازار، کوہاٹ۔ فون: 516261

بہرام میڈیکل سنٹر، کوہاٹ۔ فون: 512747

03 JAN 2010

حبیب سلطان

Known HTN

taking medication - now have complaints chest pain → back
BP on presenting. BP 110/80 - 1/7. HS + chest - Normal
Adv. CXR PA view

Rx.

Tab. Sustac 2.6 mg
0-0-1

Tab. Vasitel MR
0-0-1

Tab. Rovista 10 mg
0-0-1

Tab. Disprin CD 100 mg
0-0-1

Tab. Nims 100 mg
1-1-1 0-0

Tab. Meptil 25 mg
1-0-1 0-0

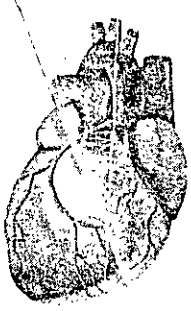
Tab. Hydrochlorothiazide 25 mg
1-0-0 0-0

3. Lisodan
3. Disorthi

Deep
9m

(27)

Dr. Kamran Bangash
M.D,Dip card 'PIC'
Cardiologist / Physician
Consultant Cardiologist
Hayat Abad Medical Complex
Peshawar



ڈاکٹر کامران بنگش
ایم ڈی، ڈپ کارڈ 'پی آئی سی'
ماہر امراض قلب / فزیشن
کنسلٹنٹ کارڈیالوجسٹ
حیات آباد میڈیکل کمپلیکس پشاور

Name Habib Sultan Bibi Age 60yr Date 12 JUL 2009

Rx

Tab. Concor 5mg
Tab. Manis 10-40
Tab. Ascard 75
Tab. Vertaxel-HR 1-1
Cap. Risek 20
Tab. Relaxin

- chest pain on effort
- Pain 4/15
- 120/80
- S1S2
- ETT +ve
- U/S
- CAD/angina

کلینک: کمرہ نمبر 205 دوسری منزل ابراہیمی ہسپتال، ڈبگری گارڈن۔ فون نمبر 2565776-2567448 تعطیل بروز ہفتہ، اتوار

Dr. Mir Raza Shah Orakzai

M.B.B.S. Peshawar
D.M.R.D.1, (F.P.G.M.I) Lahore
Specialist: Ultra Sound C.T. Scan, Mrl
Medical Officer:
Distt: Head Quarter Hospital, Hangu.

هوالشافی

موبائل: 0333-9679455

ڈاکٹر میر رضا شاہ اورکزئی

ایم بی بی ایس (پشاور)
ڈی ایم آر ڈی ا (ایف پی جی ایم آئی) لاہور
سپیشلسٹ: الٹرا ساؤنڈ۔ سی ٹی سکین۔ ایم آر آئی
میڈیکل آفیسر: ڈسٹرکٹ ہیڈ کوارٹر ہسپتال ہنگو

Name HABIB - Sulhan Age Sex Date 12.7.09

CLINICAL RECORD

U/S

Liver is enlarged by 1.3 cm. hard. irregular Texture. G.B is distended. Lumen no Calculus seen.

Both kidneys are normal in size & shape. No stone / hydronephrosis seen.

U/B is full & normal.

No Ascites

Impression: Liver is mildly enlarged

شمس الضیاء میڈیکوز
0332-2203339
0333-9677504

روزانہ کلینک: باب المدینہ میڈیکل سنٹر ٹل روڈ ہنگو

(29)

ڈاکٹر مصاحب علی

ایم بی بی ایس، ڈی ٹی سی ڈی (پاک)

ڈپ کارڈ (لندن)

ماہر امراض قلب، بلڈ پریشر، سینہ، ٹی بی

کلینک: بنگش پلازہ تیراہ بازار، کوہاٹ۔ فون: 516261

بہرام میڈیکل سنٹر، کوہاٹ۔ فون: 512747

0 8 DEC 2009

حبیب سلطان

CAD.

Bp. 100/70 mm.

Rx.

Tab. Sustac 10mg 1-0-1

Tab. Angised SL.

Tab. Vasteril MR 1-0-1

Tab. Rovesta 10mg ① رات کھانے کے بعد

Tab. polypep 20 2

(30)

ڈاکٹر مصاحب علی

ایم بی بی ایس، ڈی ٹی سی ڈی (پاک)

ڈپ کارڈ (لندن)

ماہر امراض قلب، بلڈ پریشر، سینہ، ٹی بی

کلینک: بنگش پلازہ تیراہ بازار، کوہاٹ۔ فون: 516261
بہرام میڈیکل سنٹر، کوہاٹ۔ فون: 512747

1 8 OCT 2009

حبیب سلطان

11+1

BP. 130/80

Tab. Actim 2 tab
ایک ایک

Tab. Lustric 2 tab
ایک ایک

Tab. Dispromin 10 mg
ایک ایک

Inj. Avil 1 ml S/L.
اب ضرورت زبان کا نیچے رکھیں

Tab. Omnidol
درد کی صورت میں

Inj. Trimetabol
ایک ایک گھنٹے میں

(31)

ڈاکٹر مصاحب علی

ایم بی بی ایس، ڈی ٹی سی ڈی (پاک)
ڈپ کارڈ (لندن)
ماہر امراض قلب، بلڈ پریشر، سینہ، ٹی بی
کلینک: بنگش پلازہ تیراہ بازار، کوہاٹ۔ فون: 516261
بہرام میڈیکل سنٹر، کوہاٹ۔ فون: 512747

2 8 JUN 2009

حبیب سلطان

CAD

Bp 100/70

Tab. Sustac

Ins. Dispirico

Ins. Vasteril MR

Syp. Brinetusol

(32)

ڈاکٹر مصاحب علی

ایم بی بی ایس، ڈی ٹی سی ڈی (پاک)
ڈپ کارڈ (لندن)
ماہر امراض قلب، بلڈ پریشر، سینہ، ٹی بی
کلینک: بنگش پلازہ تیراہ بازار، کوہاٹ۔ فون: 516261

3 1 MAY 2009

حبیب سلطان

Know CAD.

BP. 130/80

ECG. Ant. Ischemia

Rx.

Tab. Nitromint

Tab. Diprinova

Tab. Spironidac 20

Tab. Rosiston

Syp. Lopressor

Adv. ETT

the 28/6

Patient: Habib Sultan
PID: 021

Age: 53 y | Height: 68 in | Pacemaker: No | Family: Yes
Sex: Female | Weight: 170 lbs | Smoking: No | Alcohol: No

Referred By: Dr.Masahib Ali

Medication: Tab Nitromint 2.6 mg
TAb Disprin CV
Tab Spiromide

Indications: Chest Pain

Test Details:

Test Site: | Technician: A.Ikram
Test Date: 6/28/2009, 10:51 AM | Report Date: 6/28/2009, 11:01 AM
Software: QRS Card Cardiology Suite (Enu 4.04)
Recorder: qrsltdi.adv (SN: 0306AU03710089Ay) rev V03.04

HR 87

Baseline Measurements
PR: 167 ms
QRS: 79 ms
QT / QTC: 350 ms / 422

BP 130/80

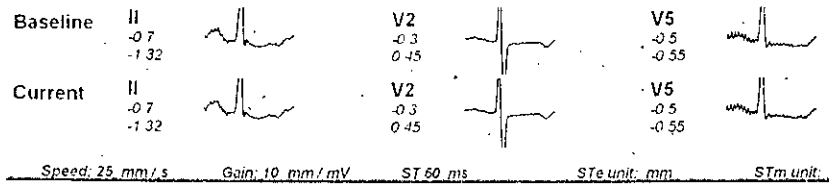
Current Measurements
PR: 167 ms
QRS: 79 ms
QT / QTC: 350 ms / 422

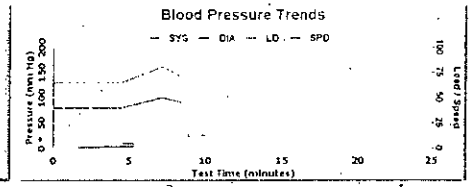
Strip Details:

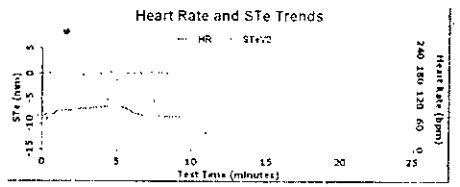
Phase: | Phase Time:
Stage: | METS:
Device Load:

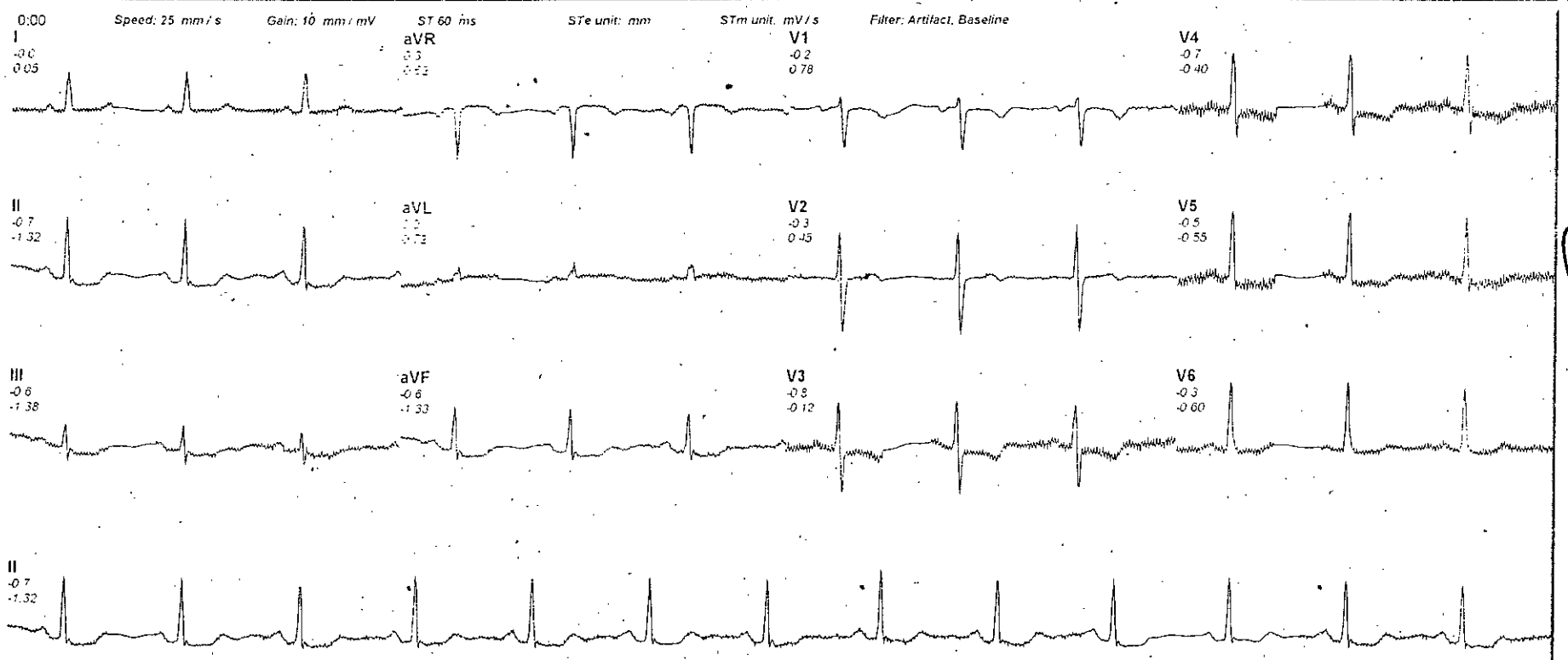
Test Results:

Protocol: Modified | Device: Treadmill (Trackmaster)
Maximum HR: 102 [63 % of THR (162)]
Maximum BP: 160 / | Maximum DP: 12480
Maximum ST: 2.0 mm @ 4:34 [V5]
Maximum Load: 1.7 mi / hr, 5.0 % grade [3.5 METS]
Test Time: 9:21 | Exercise Time: 3:02
Termination Reason: Patient Request









33

1001, Stress ECG Segment (12 lead)

(34)

Stress ECG Stage Complex Summary

Client: Habib Sultan

Age: 58 y | Height: 68 in | Pacemaker: No | Family: Yes
Sex: Female | Weight: 170 lbs | Smoking: No | Alcohol: No

Referred By: Dr.Masahib Ali

PID: 021

Medication: Tab Nitromint 2.6 mg
TAb Disprin CV
Tab Spiromide
Tab Novsta

Test Date: 6/28/2009, 10:51 AM

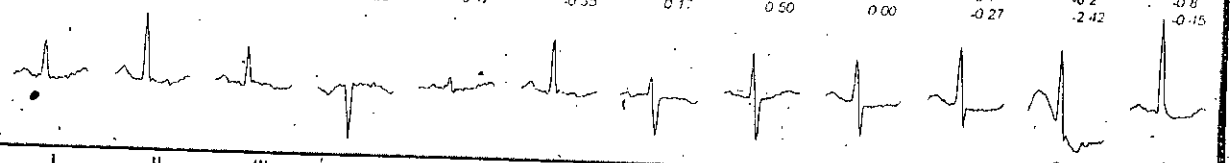
Report Date: 6/28/2009, 11:01 AM

Exercise

Speed: 25 mm / s | Gain: 10 mm / mV | ST 60 ms | STe unit: mm | STm unit: mV / s

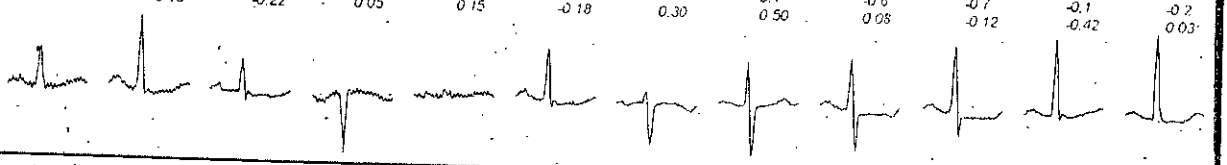
	I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
2	-0.1 / -0.05	-0.2 / -0.38	-0.1 / -0.32	0.2 / 0.22	0.0 / 0.12	-0.2 / -0.35	-0.3 / 0.17	0.2 / 0.50	-0.6 / 0.00	-0.1 / -0.27	-6.2 / -2.42	-0.8 / -0.15

HR: 102
BP: 130 / 80
Phase: 2:01
Stage: 0:50
METS: 3.5
1.7 mi / hr, 5.0 %



	I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
2	0.0 / 0.07	-0.4 / -0.15	-0.4 / -0.22	0.2 / 0.05	0.2 / 0.15	-0.4 / -0.18	-0.0 / 0.30	0.1 / 0.50	-0.6 / 0.08	-0.7 / -0.12	-0.1 / -0.42	-0.2 / 0.03

HR: 86
BP: 130 / 80
Phase: 3:01
Stage: 1:50
METS: 3.5
1.7 mi / hr, 5.0 %

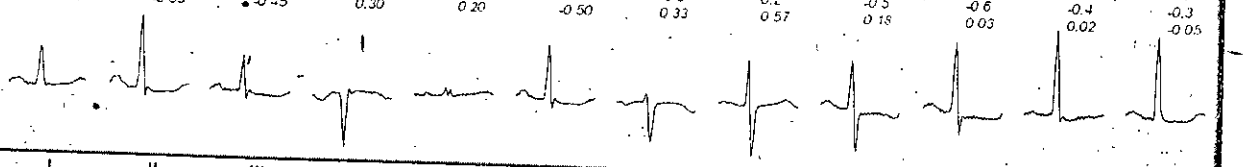


Recovery

Speed: 25 mm / s | Gain: 10 mm / mV | ST 60 ms | STe unit: mm | STm unit: mV / s

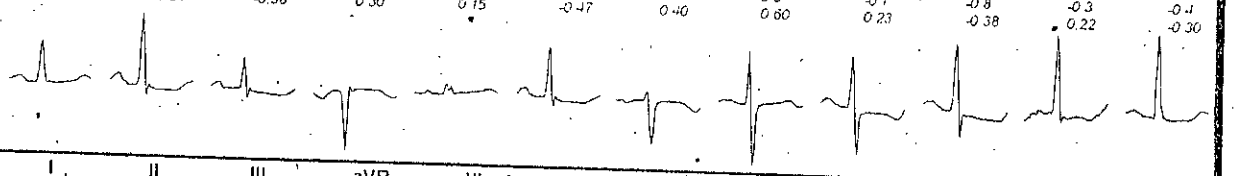
	I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
Cool-Down	-0.1 / -0.08	-0.5 / -0.53	-0.4 / -0.45	0.3 / 0.30	0.1 / 0.20	-0.5 / -0.50	-0.0 / 0.33	0.2 / 0.57	-0.5 / 0.18	-0.6 / 0.03	-0.4 / 0.02	-0.3 / -0.05

HR: 60
BP: ..
Phase: 0:45
Stage: 0:45
METS: 2.1
1.5 mi / hr, 0.0 %



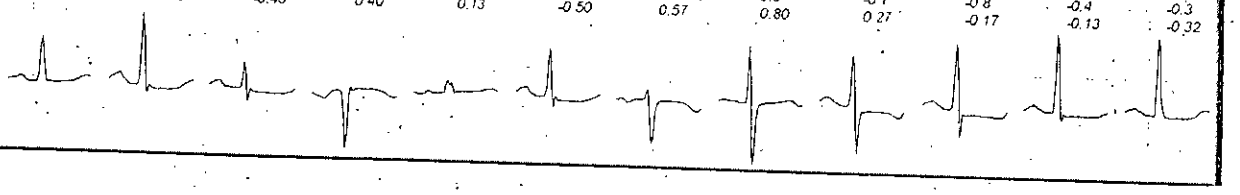
	I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
Recovery	-0.0 / -0.12	-0.5 / -0.50	-0.5 / -0.38	0.2 / 0.30	0.2 / 0.15	-0.5 / -0.47	-0.1 / 0.40	0.0 / 0.60	-0.7 / 0.23	-0.8 / -0.38	-0.3 / 0.22	-0.4 / -0.30

HR: 79
BP: 150 / 95
Phase: 1:50
Stage: 0:50
METS: 1.0
0.0 mi / hr, 0.0 %



	I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
Recovery	0.0 / -0.18	-0.5 / -0.60	-0.5 / -0.43	0.2 / 0.40	0.2 / 0.13	-0.5 / -0.50	-0.1 / 0.57	0.0 / 0.80	-0.7 / 0.27	-0.8 / -0.17	-0.4 / -0.13	-0.3 / -0.32

HR: 78
BP: 150 / 95
Phase: 2:50
Stage: 1:50
METS: 1.0
0.0 mi / hr, 0.0 %



35

Stress Phase ECG Complex Summary

Patient: Habib Sultan

Age: 58 y Height: 68 in Pacemaker: No Family: Yes
Sex: Female Weight: 170 lbs Smoking: No Alcohol: No

Referred By: Dr.Masahib Ali

PID: 021

Medication: Tab Nitromint 2.6 mg
TAb Disprin CV
Tab Suromide
Tab Robista

Test Date: 6/28/2009, 10:51 AM Report Date: 6/28/2009, 11:01 AM

Indications:

Chest Pain

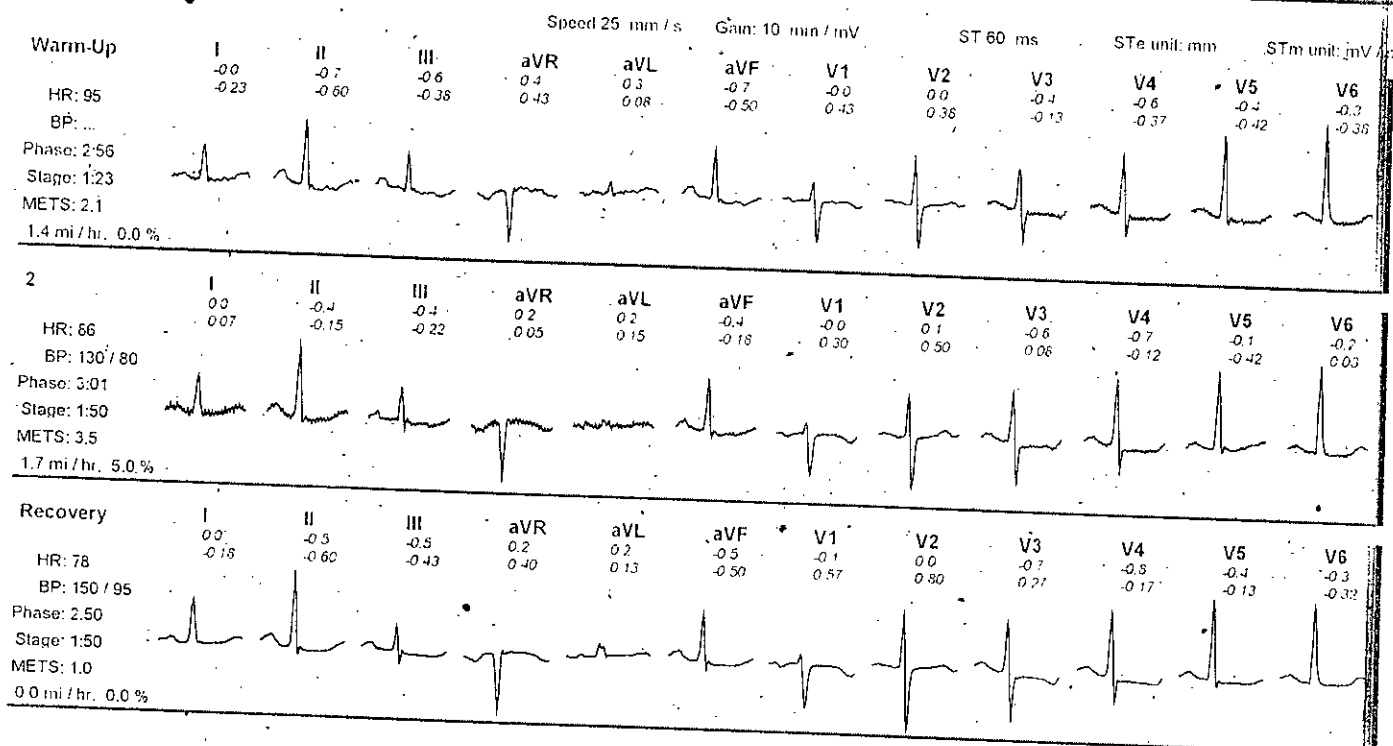
Test Details:

Test Site:
Test Date: 6/28/2009, 10:51 AM Technician: A.Ikram
Software: QRS Card Cardiology Report Date: 6/28/2009, 11:01 AM
Recorder: qrsftdi.adv (SN:

Test Results:

Protocol: Modified Device: Treadmill (Trackmaster Treadmill)
Maximum HR: 102 [63 % of THR (162)]
Maximum BP: 160 / Maximum DP: 12480
Maximum ST: 2.0 mm @ 4:34 [V5]
Maximum Load: 1.7 mi / hr, 5.0 % grade [3.5 METS]
Test Time: 9:21 Exercise Time: 3:02
Termination Reason: Patient Request

Speed 25 mm / s Gain: 10 mm / mV ST 60 ms STe unit: mm STm unit: mV



Conclusions: Habib Sultan exercised on a Treadmill (Trackmaster Treadmill) for 9:21 minutes. Her total exercise time was 3:02 minutes during which she acheived a maximum heart rate of 102 BPM, which was 63 % of her age predicted target heart rate of 162 BPM.

Ms. Sultan's maximum exercise effort was 1.7 mi / hr, 5.0 % grade [3.5 METS]. Her maximum blood pressure was 160 / 100. Her maximum double product was 12480 (Maximum HR x Maximum BP = 16320).

Ms. Sultan's ECG showed 1 leads with ST elevation variation greater than 1 mm. These are V5. The maximum ST elevation variation was 2.0 mm @ 4:34 [V5].

Ms. Sultan's ECG showed 3 leads with ST depression variation less than -1 mm. These are V2, V3, V5. The maximum ST depression variation was -6.8 mm @ 5:19 [V5].

Physician's Signature Date

(36)

Stress ECG Summary Report

Patient: Habib Sultan

Age: 58 y
Height: 68 in
Pacemaker: No
Smoking: No
Medication: Tab Nitromint 2.6 mg
TAb Disprin CV

Sex: Female
Weight: 170 lbs
Family: Yes
Alcohol: No

ID: 021
Address:
Hangu
Hangu,

Telephone:

Indications: Chest Pain

Referring Physician: Dr.Masahib Ali

ID: 021

Address:

Telephone:

Test Details:

Test Date: 6/28/2009, 10:51 AM
Report Date: 6/28/2009, 11:01 AM

Hookup: A.Ikram
Scanned:

Software: QRS Card Cardiology Suite (Enu 4.04)
Recorder: qrsftdi.adv (SN: 0306AU0371O089Ay) rev V03.04

Conclusions:

Habib Sultan exercised on a Treadmill (Trackmaster Treadmill) for 9:21 minutes. Her total exercise time was 3:02 minutes during which she acheived a maximum heart rate of 102 BPM, which was 63 % of her age predicted target heart rate of 162 BPM

Ms. Sultan's maximum exercise effort was 1.7 mi / hr, 5.0 % grade [3.5 METS]. Her maximum blood pressure was 160 / 100. Her maximum double product was 12480 (Maximum HR x Maximum BP = 16320).

Ms. Sultan's ECG showed 1 leads with ST elevation variation greater than 1 mm. These are V5. The maximum ST elevation variation was 2.0 mm @ 4:34 [V5].

Ms. Sultan's ECG showed 3 leads with ST depression variation less than -1 mm. These are V2, V3, V5. The maximum ST depression variation was -6.8 mm @ 5:19 [V5].

* 63% Target heart rate achieved.
* Resting BP was 130/80 mmHg.
* BP was raised upto 160/100 during exercise.
* Limiting factor was fatigue.
* From warm up stage to stage 2 T↓ -0.5mm to -0.8 mm observed in inferior and lateral leads.
* After exercise pt feels mild to moderate left chest pain radiating to left arm.
* Positive for Ischemia and Angina Pectoris.

Physician's Signature

Date 28/6/09

37

Stress ECG Stage Complex Summary

Patient: Habib Sultan
Age: 58 y Height: 68 in Pacemaker: No Family: Yes
Sex: Female Weight: 170 lbs Smoking: No Alcohol: No
Referred By: Dr.Masahib Ali

PID: 021
Medication. Tab Nitromint 2.6 mg
TAb Disprin CV
Tab Spiromide
Test Date: 6/28/2009. 10:51 AM

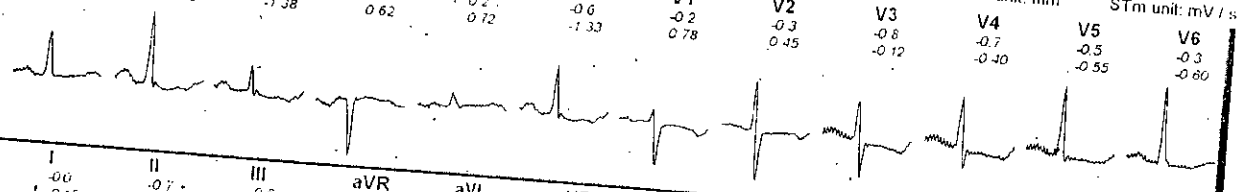
Report Date: 6/28/2009. 11:01 AM

Speed: 25 mm / s Gain: 10 mm / mV ST 60 ms STe unit: mm STm unit: mV / s

Pre-Test

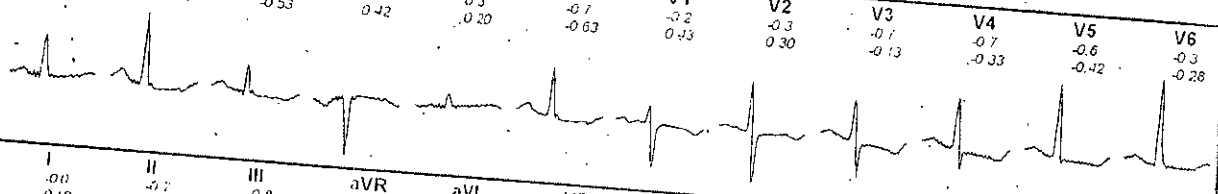
Supine
HR: 67
BP: 130 / 80
Phase: 0:50
Stage: 0:50
METS: 1.0
0.0 mi / hr. 0.0 %

I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
-0.0 / 0.05	-0.7 / -1.32	-0.6 / -1.38	0.3 / 0.62	0.2 / 0.72	-0.6 / -1.33	-0.2 / 0.78	-0.3 / 0.45	-0.8 / -0.12	-0.7 / -0.40	-0.5 / -0.55	-0.3 / -0.60



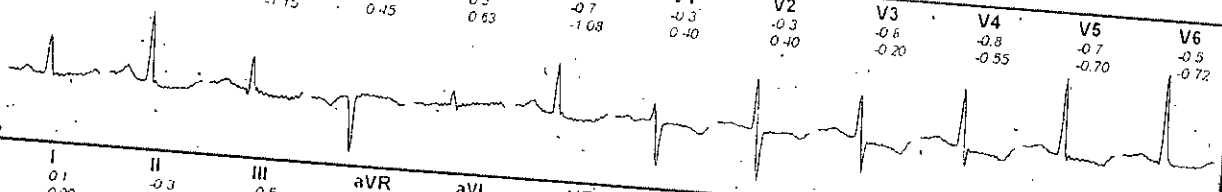
Supine
HR: 68
BP: 130 / 80
Phase: 1:06
Stage: 1:06
METS: 1.0
0.0 mi / hr. 0.0 %

I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
-0.0 / -0.15	-0.7 / -0.68	-0.6 / -0.53	0.4 / 0.42	0.3 / 0.20	-0.7 / -0.63	-0.2 / 0.43	-0.3 / 0.30	-0.1 / -0.13	-0.7 / -0.33	-0.6 / -0.42	-0.3 / -0.28



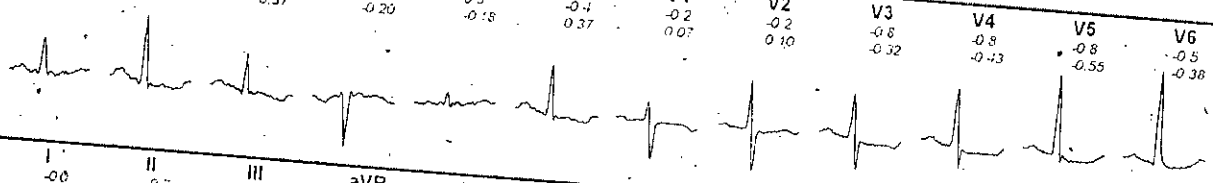
Hypervent
HR: 68
BP: ...
Phase: 1:22
Stage: 0:05
METS: 1.0
0.0 mi / hr. 0.0 %

I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
-0.0 / 0.10	-0.7 / -1.03	-0.8 / -1.15	0.3 / 0.45	0.3 / 0.63	-0.7 / -1.08	-0.3 / 0.40	-0.3 / 0.40	-0.6 / -0.20	-0.8 / -0.55	-0.7 / -0.70	-0.5 / -0.72



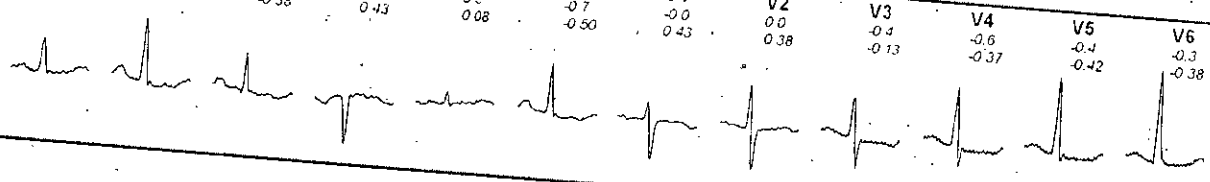
Warm-Up
HR: 96
BP: ...
Phase: 2:24
Stage: 0:51
METS: 2.1
1.4 mi / hr. 0.0 %

I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
0.1 / 0.00	-0.3 / 0.37	-0.5 / 0.37	0.1 / -0.20	0.3 / -0.15	-0.4 / 0.37	-0.2 / 0.07	-0.2 / 0.10	-0.8 / -0.32	-0.8 / -0.43	-0.8 / -0.55	-0.5 / -0.38



Warm-Up
HR: 95
BP: ...
Phase: 2:56
Stage: 1:23
METS: 2.1
1.4 mi / hr. 0.0 %

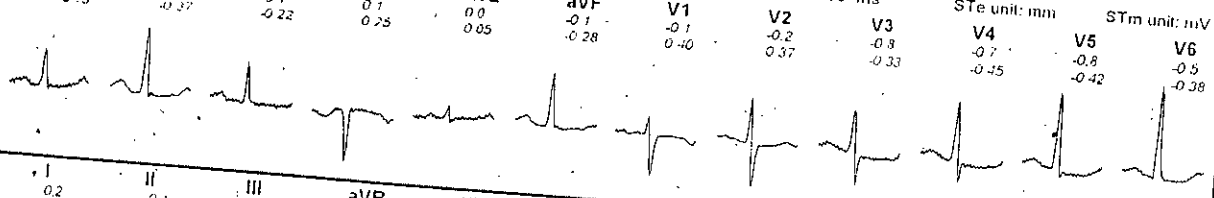
I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
-0.0 / -0.23	-0.7 / -0.60	-0.6 / -0.38	0.4 / 0.43	0.3 / 0.08	-0.7 / -0.50	-0.0 / 0.43	0.0 / 0.38	-0.4 / -0.13	-0.6 / -0.37	-0.4 / -0.42	-0.3 / -0.38



Exercise

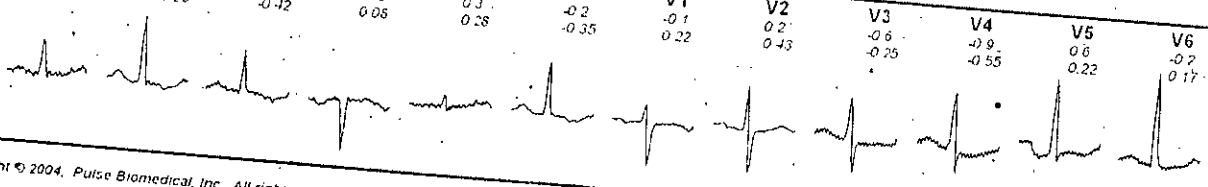
1
HR: 100
BP: 130 / 80
Phase: 0:50
Stage: 0:50
METS: 2.3
1.7 mi / hr. 0.0 %

I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
-0.0 / -0.13	-0.2 / -0.37	-0.1 / -0.22	0.1 / 0.25	0.0 / 0.05	-0.1 / -0.28	-0.1 / 0.40	-0.2 / 0.37	-0.8 / -0.33	-0.7 / -0.45	-0.8 / -0.42	-0.5 / -0.38



1
HR: 102
BP: 130 / 80
Phase: 1:00
Stage: 1:00
METS: 2.3
1.7 mi / hr. 0.0 %

I	II	III	aVR	aVL	aVF	V1	V2	V3	V4	V5	V6
0.2 / 0.13	-0.1 / -0.28	-0.3 / -0.42	-0.0 / 0.05	0.3 / 0.28	-0.2 / -0.35	-0.1 / 0.22	0.2 / 0.43	-0.6 / -0.25	-0.9 / -0.55	0.6 / 0.22	-0.2 / 0.17



Patient: Habib Sultan
PID: 021

6/28/2009, 10:51 AM

HR 87
BP 130/80

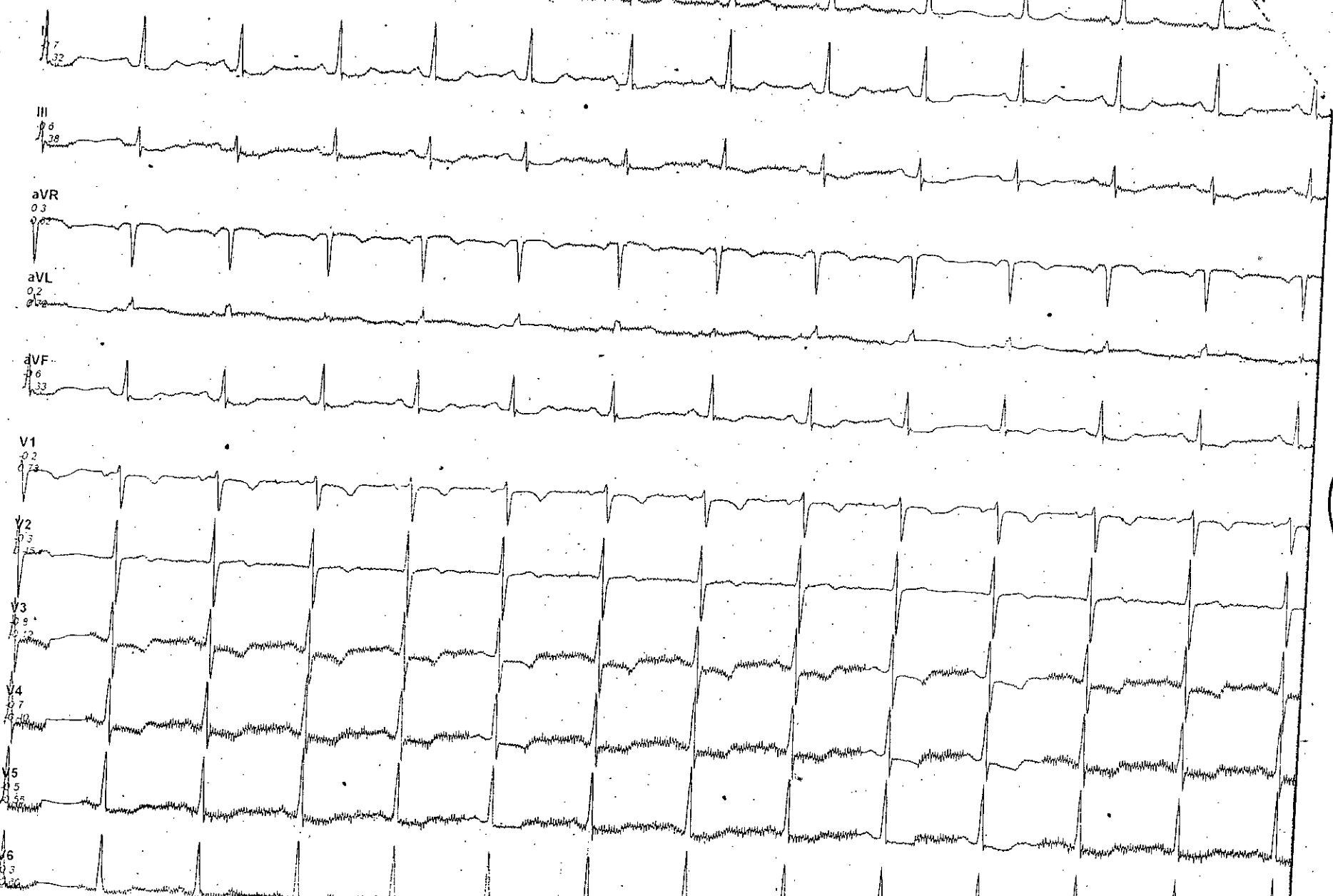
PR: 167 ms
QT / QTC: 350 ms / 422

QRS: 79 ms

Speed:
Modified Bruce

Load:

10:00 Speed: 25 mm / s Gain: 10 mm - mV ST 60 ms STe unit: mm STm unit: mV / s Filter: Artifact, Baseline



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FAUJI FOUNDATION HOSPITAL PESHAWAR
COLOUR DOPPLER ECHOCARDIOGRAPHY REPORT

Name	Bibi Sultan	Age 50 Years	Date	18/06/08	Address	Hango

M-Mode & 2-D Study

S No	M-Mode & 2-D Measurements	Observed (CM)	Normal range according to weight (Lbs)					
			Adult	0-25	26-50	51-75	76-100	101-200
1	Left Vent Diastolic Dimension	4.8	5.7	3.2	3.8	4.5	4.7	4.9
2	Left Vent Systolic Dimension	3.3						
3	Rt Vent Dimension	2.0	2.6	1.5	1.5	2.0	2.0	2.2
4	Inter Vent Septal Thickness	0.9	1.1	0.6	0.7	0.8	0.8	0.8
5	Left Vent Post Wall thickness	0.9	1.1	0.6	0.7	0.8	0.8	0.8
6	Aortic root Dimension	3.1	3.7	1.7	2.2	2.3	2.3	2.8
7	Left Atrial Dimension	3.7	4.0	2.3	2.7	3.0	3.0	3.0
8	LV Fractional Shortening		30%					
9	LV Ejection Fraction	>55%	50%					

Mitral valve area (Cm) 2 _____ 2. V.S.D Size _____ 3. R.P.A _____ 4. L.P.A (Size) _____

COMMENTS ON M-MODE & 2-D

- Normal size cardiac chambers.
- Normal global LV systolic function.
- No obvious regional wall motion abnormality.
- E. A reversal noted.
- Valves are normal in structure.
- No Clot or P.E.

Doppler Study

	Gradient mm Hg		REGURGITATION	HAEMODYNAMICS (MM Hg)	
	Peak	Mean			
Mitral Valve			Trace		
Tricupid Valve				Rt Vent Sys Press	
Aortic Valve					
Pulmonic Valve				Mitral V. Area (Cm) 2	
VSD Gradient					

COMMENTS ON DOPPLER:

⇒ Trace MR,

PROVISIONAL IMPRESSION:

✓ LV Diastolic dysfunction.

Dr. Shahzad K. Bangash
M.B.B.S. D. Card
CARDIOLOGIST
F.F.H. Peshawar.

(40)

Dr. Kamran Bangash
M.D,Dip card 'PIC'
Cardiologist / Physician
Consultant Cardiologist
Hayat Abad Medical Complex
Peshawar

ڈاکٹر کامران بنگش
ایم ڈی، ڈپ کارڈ 'پی آئی سی'
ماہر امراض قلب / فزیشن
کنسلٹنٹ کارڈیالوجسٹ
حیات آباد میڈیکل کمپلیکس پشاور

Name Habib Sultan Bibi Age 60 yrs Date 28 DEC 2008

Rx

Tab. Cardel 1+1 SO
Tab. Lustac 1+1 2.6
Tab. Norplat-S
Tab. Rabip 1 Tab daily 10 days

Tab. Relaxa 1 Tab daily 3 days

Chest pain
on effort
Breathlessness
mild anemia
BP 130/80
S/S
CAD/angina

کلینک: کمرہ نمبر 205 دوسری منزل ابراہیمی ہسپتال، ڈگری گارڈن۔ فون نمبر 2565776-2567448 تعطیل بروز ہفتہ، اتوار

(4t)

COLOUR DOPPLER ECHO CARDIOGRAPHY REPORT

THE CARDIAC CARE CLINIC

SAID ANWAR MEDICAL CENTER

Room 220 1st Floor Dabgari Garden Peshawar

NAME: MRS IRAQ BADSHAH AGE 58 YRS DATE 02.02.2006 ADDRESS HANGU

M-Mode & 2-D Study

M-Mode & 2-D measurements	observed (Cm)	Normal range according to weight (Lbs)					
		Adult	0-25	26-50	51-75	76-100	101-200
1 Left Vent Diastolic Dimension	5.0	5.7	3.2	3.8	4.5	4.7	4.9
2 Left Vent Systolic Dimension	3.5						
3 Rt Vent Dimension	1.8	2.6	1.5	1.5	2.0	2.0	2.2
4 Inter Vent Septal Thickness	0.8	1.1	0.6	0.7	0.8	0.8	0.8
5 Left Vent Post. Wall thickness	0.8	1.1	0.6	0.7	0.8	0.8	0.8
6 Aortic root Dimension	3.2	3.7	1.7	2.2	2.3	2.3	2.8
7 Left Artial Dimension	2.5	4.0	2.3	2.7	3.0	3.0	3.0
8 LV Fractional Shortening	30%	30%					
9 LV Ejection Fraction	55%	50%					

1. Mitral valve area (Cm)^2 _____ **2. V.S.D Size** _____ **3. R.P.A** _____ **4. L.P.A (Size)** _____

COMMENTS ON M-MODE & 2-D:

Left ventricle,Left atrium and Right ventricle size are normal.
Good Left ventricle function.
No segmental wall motion abnormaility seen.
Valvular structures are normal.
No vegetation visualized. No ASD / VSD seen.
No LA / LV clot seen. No pericardial effusion visualized.

Doppler Study

	Gradiant mm Hg		REGURGITATION	HAEMODYNAMICS (mm Hg)	
	Peak	Mean			
Mitral Valve					
Tricupid Valve				Rt Vent Sys Press	
Aortic Valve					
Pulmonic Valve				Mitral V.Area (Cm)^2	
VSD Gradiant					

COMMENTS ON DOPPLER: Normal.

CONCLUSION: Normal echo study.

Dr.Zahid Aslam Awan
Asstt.Prof.Card.HMC.
FCPS(Med) FCPS (Card).

(42)

Dr. Kamran Bangash

M.D., DIP CARD (PIC)
Cardiologist/Physician
[illegible] Hospital,
Peshawar

Name: Habib Sultan Bibi Age: 50 yrs Date: 28 NOV 2004

- chest Pain on exertion
- BP - 130/80
- CAD ?
- Dep

Rx

Tab. Carvel 12.5 1-1, 25

Tab. Praz 0.5 1-0-1

Cap Depramil 20 1-0-1

Bangash

Dr. Kamran Bangash
(Cardiologist)
Hayatabad Medical Complex Peshawar
Clinic: Al-Ibrahimi Hospital
Dabgari Gardens, Peshawar.

(43)

Dr. Kamran Bangash

M.D., DIP CARD (PIC)
Cardiologist/Physician
[redacted],
Peshawar

Name: Habib Sultan Bibi Age: 50 yrs Date: 21 NOV 2004

Rx

- Tab. Carvel 1-0-1 25
- Tab. Praz 0.5 1-0-1
- Tab. ~~Sorbitman~~ F-lo- 1-0-1 20

- chest Pain
- Palpitation
- BP 130/80
- S1 S2
- B.G.
- CAD/angina
- DM

Bangash

Dr. Kamran Bangash
(Cardiologist)
Hayatabad Medical Complex Peshawar
Clinic: Al-Ibrahimi Hospital
Dabgari Gardens, Peshawar.

بعدالت جناب سروس ٹریبونل خیبر پختونخوا پشاور

مورخہ 17 جولائی 2012ء منجانب پیشاور

مقدمہ بہادر نواز بنام D.P.O وغیرہ

دعویٰ

جرم

باعث تحریر آنکہ

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

آن مقام پشاور کیلئے صفدر اقبال صاحب ایڈووکیٹ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے وتقرر ثالث وفیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک وروپیہ ارعرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برامدگی اور منسوخی نیز دائر کرنے اپیل نگرانی ونظر ثانی وپیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور وقبول ہوگا دوران مقدمہ میں جو خرچہ ہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہٰذا وکالت نامہ لکھدیا کہ سند رہے۔

المرقوم 17 ماہ 07 2012ء

Accepted

Safdar Iqbal Advocate

العبد گواہ العبد

مقام پشاور کے لئے منظور ہے۔

Bahadar Nawaz

GS&PD.KP-1333/2-RST-20,000 Forms-21.03.2011/P4(Z)/F=PHC Jobs/Form A&B Ser. Tribunal

"B"

Pre-admission Notice

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

P.H

No.

Regd

Appeal No. 818 *of 20* 12

Bahadur Nawaz ..... *Appellant/Petitioner*

Versus

D.P.O, Hangu ..... *Respondent*

Respondent No......

Notice to: — Deputy Superintendent of Police Hangu

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 1-10-2012 **at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.**

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 5th **Day of** Sep. **20** 12

(To Produce the Record)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

GS&PD.KP-1333/2-RST-20,000 Forms-21.03.2011/P4(Z)/F=PHC Jobs/Form A&B Ser. Tribunal

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 818 *of 20* 12

Regd

Babadar Nawaz *Appellant/Petitioner*

Versus

D.P.O. Hangu *Respondent*

Respondent No.

Notice to: — Dy: Inspector General of Police Kohat Region Kohat

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 10.10.2012 **at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.**

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide~~ this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 5th

Day of Sep **20** 12

(To Produce the Record.)

Registrar
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA , PESHAWAR.

Service Appeal No.818/ 2012

Bahadar Nawaz s/of Iraq Badshah

Constable NO.182/94 r/o Kotki, District Hangu.....Appellant

29/3/13

VERSUS

1. District Police Officer Hangu.
2. Deputy Inspector General of Police Kohat Region, Kohat.
3. Deputy Superintendent of Police Hangu.
4. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.....Respondents

Preliminary Objection.

1. That applicant has got no cause of action.
2. That, the appeal is liable to be dismissed in liminie
3. That, the appellant is estopped for filing appeal due to his own conduct.
4. That, the appeal is barred by time & limitation.

Parawise Comments.

Respectfully shewth

The parawise comments to the appeal filed by appellant are submitted as follows.

1. Incorrect. That, in fact the appellant was appointed in District Police Hangu on 25.10.2004.
2. Incorrect. That, in fact the appellant intentionally and deliberately absented himself from official duty without any leave or permission from his seniors. Now, the applicant has come up with baseless lame excuses, so as to cover his considerable long absence of two year i-e, w-e f 30.03.2009 till the date of his dismissal i-e 12.04.2012.
3. Incorrect. That, after the completion of all legal/codal formalities, the appellant was dismissed from service by the competent authority (DPO Hangu) vide his office Order Book No.199, dated 12.04.2011.(copy of charge sheet No.1711/PA dated 29.03.2011 and summary of allegations are enclosed).
4. Correct. That, the appeal of the appellant being contrary to law and badly time barred was dismissed by the competent authority on 21.04.2012.
5. Correct. That, the regional Police Officer Kohat Division Kohat had already filed the appeal of the appellant on 21.04.2012 as stated in Para No.4 and there was no provision in the rules to file second appeal/representation as such the competent authority (PPO) filed the appeal/representation of the appellant on 02.07.2012. (copies of appeals and the orders annexed)
6. Needs no comments.

Grounds.

a. Incorrect. That, the impugned orders of the competent authorities are according to law and facts on record which have been passed after observing the legal and codal formalities as required under the prescribed rules and principles of natural justice.

b. Incorrect. That, the order of respondent No.1 is legal, justified and lawful in all respects.

c. Incorrect. That, the appellant has proved himself to be an indisciplined constable during his service. Prior to this he absented himself on two occasion i-e twelve days & eighty three days for which he has been punished vide OB No.31 dated 13.02.2008 & OB NO.658 dated 24.09.2008 (copy enclosed).

d. Incorrect. That, the appellant was summoned by the enquiry committee time and again but neither he appeared before the enquiry committee to join the enquiry proceeding nor submitted reply to the charge sheet.

e. Incorrect. That, proper enquiry was conducted against the applicant under the prescribed rules and according to the legal procedure but the applicant inspite of repeatedly summoned by the enquiry committee did not turn up to face the departmental proceeding nor submitted any reply to the charge sheet because he was not interested to serve further in the Police Department otherwise he would not remain absent for such long period of two years from official duty without any leave or permission. Further more during the absence period of two years he adopted the profession of driver (copies of summons enclosed).

f. Incorrect. That, the appellant intentionally& deliberately absented himself for considerable long period of two year without any leave or permission and now appellant has come up with baseless lame excuses so as to cover his long absence from official duty.

g. Incorrect. That, the appellant was appointed on 25.10.2004 as per entry in his service record. He did not serve to the satisfaction of his seniors because he also remained absent on two occasion for which he was punished twice for his willful absence as stated in Para No.(C).

h. Needs no comments.

Prayer.

It is therefore, humbly prayed that the appeal of the appellant being illegal, devoid of merit without any substance and badly time barred may be dismissed with costs.

District Police Officer,
Hangu
(Respondent No.1)

Deputy Inspector General Of Police,
Kohat Region, Kohat
(Respondent No.2)

Deputy Superintendent of Police
Hangu
(Respondent No.3)

Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar
(Respondent No.4)

(45)

CHARGE SHEET.

I, **ABDUR RASHID, D.P.O, HANGU** as competent authority, hereby charge you Driver Constable Bahadur Nawaz No. 182/94 while posted at Police Lines, Hangu committed the following irregularities :-

a). You were proceeding on two day casual leave but failed to report back had absented yourself from official duty with effect from 30.03.2009 to till now without any leave or prior permission.

b). Your habitual absentee shows your negligence and also amounts to gross misconduct on your part.

2. By reasons of the above, you appear to be guilty of misconduct Under Section - 3 of the K.P.K Removal from Service (SPECIAL POWER) Ordinance 2000, and have rendered yourself liable to all or any of the penalties specified in section - 3 of the Ordinance ibid.

3. You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the Enquiry Officer/Committees, as the case may be.

4. Your written defence, if any, should reach to the Enquiry Officer/Committees within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.

5. Intimate whether you desire to be heard in person.

6. A statement of allegation is enclosed.

(ABDUR RASHID)
DISTRICT POLICE OFFICER,
HANGU.

No. 1711 /PA,
Dated. 29/03/2011.

(5) 6

DISCIPLINARY ACTION.

I, **ABDUR RASHID, D.P.O, HANGU** as competent authority, am of the opinion that Driver Constable Bahadur Nawaz No. 182/94 has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of section–3 of the K.P.K Removal from Service (SPECIAL POWER) Ordinance, 2000: -

STATEMENT OF ALLEGATIONS

a). You were proceeding on two day casual leave but failed to report back had absented yourself from official duty with effect from 30.03.2009 to till now without any leave or prior permission.

b). Your habitual absentee shows your negligence and also amounts to gross misconduct on your part.

2. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations, an Enquiry Committee consisting of the following is constituted under section – 3 of the Ordinance: -

I. Inspector Gul Sarwar, RI Police Lines, Hangu.

II. SI Amirullah, Lines Officer, Hangu.

3. The Enquiry Committee shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused, record its findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the Enquiry Committee.

(ABDUR RASHID)
DISTRICT POLICE OFFICER,
HANGU.

A copy of the above is forwarded to: -

1. Inspector Gul Sarwar, RI Police Lines, Hangu & SI Amirullah, Lines Officer, Hangu. The Committee for initiating proceedings against the accused under the provisions of the K.P.K Removal from Service (SPECIAL POWER) Ordinance, 2000.

2. Driver Constable Bahadur Nawaz No. 182/94. The concerned officer's with the directions to appear before the Enquiry Committee, on the date, time and place fixed by the Committee, for the purpose of the enquiry proceedings.

بحضور جناب DIG صاحب کوہاٹ ریجن کوہاٹ۔

جناب عالی!

گزارش ہے کہ سائل 2004ء میں بطور کنسٹیبل ضلع ہنگو میں بھرتی ہوکر نہایت خوش اسلوبی سے ڈیوٹی سرانجام دے رہا تھا۔ اور افسران بالا کو کسی قسم کی شکایت کا موقع نہیں دیا تھا۔ سائل کا ماضی بے داغ ہے۔ لیکن بدوران سروس سائل کی والدہ صاحبہ بیمار ہوکر اور کچھ گھریلو مسائل اور تکلیفات کی وجہ سے سائل نوکری کرنے سے قاصر رہا۔ اب سائل کی والدہ صاحبہ بھی صحت یاب ہیں۔ اور گھریلو مسائل بھی حل ہو چکے ہیں۔ سائل دوبارہ اپنی نوکری کرنا چاہتا ہے۔ اور انشاء اللہ آئندہ بھی افسران بالا کو کسی قسم کی شکایت کا موقع نہیں دے گا۔

بذریعہ درخواست استدعا ہے۔ کہ سائل کو دوبارہ محکمہ پولیس میں بطور کنسٹیبل بحال کرنے کا حکم صادر فرمایا جائے۔ سائل اور سائل کے والدین تازیست دُعا گو رہیں گے۔ (نوٹ:- کاغذات میڈیکل والدہ صاحبہ، کاغذات ڈسچارج لف درخواست ہذا ہیں)۔

عین نوازش ہوگی

مورخہ 16.12.2011

العارض

کنسٹیبل بہادر نواز نمبر 182/94 ولد عراق بادشاہ سکنہ کوٹکی ہنگو۔

No 10176 /EC
Dt. 16-12 /2011
For Needed be D.P.O
Hangu for Comments along with
Service Record Please.

POLICE DEPARTMENT

KOHAT REGION.

ORDER.

This or order is passed on application submitted by Ex constable Bahadar Nawaz No. 182/94 of Hangu district against the order of District Police Officer, Hangu, vide which he was dismissed from service form the date of his absence.

Facts arising of the case are that the applicant while posted at Police lines Hangu had proceeded on 02 days causal leave, but did not turn up and absented himself from duty with effect from 30.03.2009. He was proceeded departmentally under the NWFP Removal from Service (Special Powers)Ord: 2000 by the DPO, Hangu. An enquiry committee comprising of Reserve Inspector and lines Officer Police Lines Hangu was appointed to scrutinize the conduct of the defaulter constable(applicant). He deliberately did not submit reply to the Charge Sheet, nor joint the enquiry proceedings till its disposal. After completion of all codal formalities the applicant was dismissed from service by the competent authority(DPO, Hangu) vide his office OB No. 199, dated 12.04.2011.

Aggrieved from the above order, the applicant preferred the said application on 16.12.2011.

The applicant was heard in person during orderly room held on 18.04.2012 and record perused.

The applicant failed to explain his conduct as well as defend himself.

Perusal of record revealed that the applicant remained absent from duty from a long period(about 02 years) i.e with effect from 30.03.2009 till the disposal of enquiry proceedings initiated against him as well as did not join the proceeding to defend himself. Record further revealed that he also remained absent from duty on two other occasion. The conduct of the applicant transpired, he is not desirable to retain in a disciplined force. Further more the application is contrary to law, badly delayed, hence dismissed.

(MOHAMMAD IMTIAZ SHAH)
PSP, QPM
Dy: Inspector General of Police,
Kohat Region, Kohat.

No. 3724-25/EC, dated Kohat the 21-4 /2012

Copy to District Police Officer Hangu for information w/r to his Memo: No. 5633/Insp:/Legal, dated 31.12.2011.

2. Ex constable Bahadar Nawaz S/O Iraq Badshah R/O Kotki Teh: & District Hangu.

(MOHAMMAD IMTIAZ SHAH)
PSP, QPM
Dy: Inspector General of Police,
Kohat Region, Kohat.

(2)

بخدمت جناب انسپکٹر جنرل صاحب I.G.P آف پولیس خیبر پختونخواہ پشاور

عنوان : درخواست برائے بحالی سروس

IMMEDIATE

جناب عالی!

مؤدبانہ گذارش ہے۔ کہ سائل کو بوجہ غیر حاضری مجازیہ جناب ڈسٹرکٹ پولیس آفیسر، ہنگو بحوالہ آرڈر نمبر 1879-83/PA مورخہ 13.04.2011 برخاست کیا تھا۔ سائل 2004ء میں بطور کنسٹبل بھرتی ہو کر نہایت خوش اسلوبی کے ساتھ ڈیوٹی سر انجام دے رہا تھا اور سائل نے بدوران سروس آفیسران بالا کو کسی قسم کی شکایت کا موقع نہیں دیا تھا۔ سائل کا ماضی بے داغ ہے۔ بدوران سروس سائل کی والدہ صاحبہ بیمار ہو کر اور کچھ گھریلو مسائل اور تکالیف کی وجہ سے سائل نوکری کرنے سے قاصر رہا۔ اب سائل کی والدہ صاحبہ بھی صحت یاب ہو چکی ہیں اور گھریلو مسائل بھی ہو چکے ہیں، دوبارہ اپنی نوکری کرنا چاہتا ہے اور انشاء اللہ آئندہ بھی آفیسران کو بالا کو کسی قسم کی شکایت کا موقع نہیں دونگا۔ سائل کے والدہ صاحبہ کے میڈیکل کا غرات آف ہے۔

لہذا بذریعہ درخواست استدعا کرتا ہے۔ کہ سائل کے موجودہ حالات کو مدنظر رکھتے ہوئے سائل کو محکمہ پولیس میں بحالی کے مناسب احکامات صادر کرا مشکور فرمائیں تاکہ سائل کی معاشی الجھنوں کی تشفی ہو سکے۔ سائل اور سائل کا خاندان آپ صاحبان کے لیے دعا گو اور مشکور و ممنون رہے گا۔

عین نوازش ہوگی۔

مورخہ 17-5-2012

19413/ET
22/5/2012

العارض

سابقہ کنسٹبل بہادر نواز نمبر 182/94
سکنہ کوٹکی تحصیل و ضلع ہنگو۔

IMMEDIATE

CHIEF MINISTER
KHYBER PAKHTUNKHWA

Kohat Region, Kohat

From : The Provincial Police Officer,
Khyber Pakhtunkhwa.
Peshawar.

To : The Deputy Inspector General of Police,
Kohat Region, Kohat.

No. 13228 /E-II dated Peshawar the 02 / 7 /2012.

Subject: **REPRESENTATION FOR RE-INSTATEMENT**

Memo:

Please refer to your office Memo: No. 5715/EC, dated: 20.06.2012.

The case of Ex-Constable Bahadar Nawaz No. 182/94 of District Police Hangu has been examined & filed by the competent authority, being time barred.

The Region chief has already filed his appeal. There is no provision in the rules for second appeal/representation.

The Service Record & Fauji Missal of the above named Ex-FC received with your Memo under reference is returned.

AIG/ESTABLISHMENT
For Provincial Police Officer,
Khyber Pakhtunkhwa.
Peshawar.

Pl SRoll
Missal

No 6207 /EC
5/7 11-7
Copy of above with encl. is forwarded to DPO/Hangu for inf. & n/a. Note making entries in his SR Rec. please

EC/081

District Police Officer
Hangu
5/7.

Office of the Distt Police Officer
Diary No 2287
Date 6/7/12

DIG POLICE
KOHAT
4/7/12

E:\My Documents(2)\E-II-3(2)\bahadar nawaz.doc

12. MISCELLANEOUS PARTICULARS

12. *Miscellaneous Particulars.*

War Medals and Descraties.—

(NOTE.—Under designation of award and date only—Gazette Notification in case of Quaid-i-Azam Police Medal and the Pakistan Police Medal. Other special decoration to be entered left under commendatory entries.)

Poussed Recruit Course

Passed the subject course held at P.T.C Hangu for term ending 20.12.06 vide Comdt P.T.C No. 464-91/S Dt 14.3.07.

OB No 59
Dt 14.3.07

D.P.O Hangu

Charge: Absented himself from duty from 18.12.07 to 30.12.07.

13. Miscellaneous particulars including awards others than those accompanied by commendation certificates, omission to removal from promotion lists.

Punishment: (12) days absence period is treated as leave w.o pay O.B. No. 31 dt 13.2.08

Deputy Superintendent of Police
Investigation Bureau
Hangu

Charge: Absented himself from duty from 03.6.200 to 25.8.2008.

Punishment: (83) days absence period is treated as leave w.o pay vide O.B. No. 658 dt

Deputy Superintendent of Po
Investigation Bureau
Hangu

پولیس سٹیشن ہری وال الہ آباد کے ڈرائیور کنسٹیبل بہادر نواز 192/94

(9)

نام مدعی اور پتہ 143/RC

کارروائی

تحریر کیا جاتا ہے کہ ڈرائیور کنسٹیبل بہادر نواز 192/94 کو مطلع کیا جاتا ہے کہ اسٹیشن انچارج R.I. کو کوئی کیس ہونے مقدمہ درج 3 6/11 کو شام ۔

جناب عالی

ڈرائیور بہادر نواز کو بذریعہ محمد آصف رشید کے ذریعے اطلاع دی گئی

R.I. Lite Hyp
31-3-11

M.H. Lite Hyp

Lo. Lite Hyp.
31.3.11

(7)

پرمانند متعلق اللہ جہالی ڈرائیور کنسل بنا دروازہ

94

بنام سید مظفر اللہ شاہ MHC

کیا رہا۔

عرض کیا جاتا ہے کہ ڈرائیور کنسل بنا دروازہ

182/94 کو مطلع کیا جاتا ہے۔ مع لیبلہ انکوائری

نے RI کو لیبلہ ۷ بجے حاضر ہو

31/3/11 کوشش کی۔

جناب عالی

الاع چن دھاگی

MHC

RI

30-3-011

Lo. Line Hqs

30.3.11

نقله ۲۲

(13)

(11)

بروانه الله عبدالله ولد ابوبکر کشل بیه در نوار 182/94

بنام دینار حسین 147 در MI ثبت

کارسرا

نوار کاپی 2 - که ولد ابوبکر کشل بیه در نوار 182/94 در مطلع کاپی - که بسلسله انکرائیر

بن Ri که در لیسه ثبت مندرج 4/11 در

شده است

جناب عالی:

معلومات داده شد

Dwel ad

محرر AI شفاخانه

7-4-11

Ro. Line Hq.

3.4.11

Ri. Line Hq

3-4-11

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No.818/2012

Bahadar Nawaz s/o Iraq Badshah
Constable No.182/94 r/o Kotki District Hangu.....Appellant

VERSUS

District Police Officer Hangu etc.....Respondents

COUNTER AFFIDAVIT

I do hereby solemnly affirm and declare on oath that contents of reply/parawise comments to the appeal filed by Ex-Constable Bahadar Nawaz No.182/94 of District Hangu are correct to the best of my knowledge and nothing has been willfully concealed from This Honourable Tribunal.

District Police Officer,
Hangu

28.12.2012

Syed Riasat Ali Shah
ADVOCATE
ATTESTED
No So (Judl)
Hdq 16-09
Notary Public Distt Courts Hangu

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Bahader Nawaz s/I Iraq Badshah.....Appellant

V/S

District Police Hangu and others.....Respondents

Rejoinder on Behalf of the Appellant.

Objections.

1. Para 1 is incorrect, the appellant was dismissed by the respondents from his service without any legal and justifiable reason therefore, the appellant has got cause of action to file appeal against the respondents.

2. Para 2 of the preliminary objection is incorrect hence denied. Detail reply given in the above Para.

3. Para 3 of the preliminary objection is incorrect hence denied.

4. Para 4 of the preliminary objection is incorrect hence denied. The appellant filed in appeal before this Hon, ble tribunal within time.

Objections on Parawise comments

1. Para 1 pertain to record.

2. Incorrect. In fact mother of the appellant was seriously ill and admitted in hospital. The appellant was busy with her mother and informed the respondents' office time and again through verbally as well as writtenly. That without permission of the respondents the appellant never absent from the office and perform his duty regularly and no complaint whatsoever has been made against the appellant from the date of the appointment.

3. Incorrect. The respondents failed to fulfill the legal and codel formalities while issuing the order dated 12.4.2012without any show cause notice nor any type of summon served upon the appellant and issue the illegal order for dismissal which against the natural justice.

4. Incorrect. The appeal of the appellant was within time and according to law but the respondents issued illegal order and dismissed the appellant from his service.

5. Incorrect, hence denied.

6. Needs no reply.

Rejoinder to the grounds

a. Incorrect. The respondents failed to fulfill the legal and codel formalities and dismissed the appellant from his service due to malafide intention. That without issue of any show cause notice or enquiry the appellant was dismissed from his service which is against the law and principle of natural justice.

b. Incorrect hence denied. Detail reply given in Para a.

c. Incorrect, the appellant never absent from duty and no such like punishment has been awarded to the appellant.

d. Incorrect hence denied. The appellant was never summoned by the enquiry committee nor any explanation was made by the respondents in this regard and no charge sheet was made nor any show cause notice were served upon the appellant and dismissed him from service. The respondents were legally bound to issue show cause notice prior to issue final orders, but the respondents failed to do this.

e. Incorrect, hence denied. Detail reply given in Para d.

f. Incorrect. Mother of the appellant was seriously ill and was admitted in hospital. Copies of the relevant documents are attached with the appeal.

g. Incorrect, detail reply given in the above paras.

h. Needs no reply.

It is therefore prayed that on acceptance of this rejoinder the order dated 12.4.2011 may kindly be declared illegal, unlawful and reinstate the appellant from his service with all back benefits.

Appellant

Through,

Dated:- 15.01.2014

Safdar Iqbal Khattak
Advocate, Peshawar