FORM OF ORDER SHEET

Court of _____

Appeal No. 2440 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/11/2023	The appeal of Mr. Muhammad Ramzan received today by registered post through Malik Hidayat Ullah Malana Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____ By the order of Chairman REGISTRAR

To

The Registrar,
Service Tribunal Khyber Pakhtunkhwa,
Peshawar.

Muhammad Ramzan Versus Govt. of Khyber Pakhtunkhwa etc

SERVICE APPEAL

Respected Sir,

Reference to objection dated 03/08/2023.

1. In respect of 1st objection, it is stated that the department dismissed the page#28 by considering it as Departmental appeal which is also evident in the order.
2. In respect of objection#2, it is stated that the order dated 21/09/2021 is present at page#27.
3. Objection#3 is removed by attesting the document.
4. In respect of objection#4, it is stated that copy is being sent for your kind perusal.

Objection has been removed accordingly and service appeal mentioned above is hereby resubmitted for further necessary action please.

Dated: 18/11/2023

Yours' Sincerely

Malik Hidayat Ullah Malana
Advocate Supreme Court
stationed at Dera Ismail Khan
Cell#0332-2339994

The appeal of Mr. Muhammad Ramzan son of Sher Afzal r/o village Gomal Kalan Shorkot D.I.Khan received today i.e on 25.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Copy of departmental appeal against the impugned termination order bearing no. 6026 dated 21.09.2022 is not attached with the appeal be placed on it. Annexure-E is reply of letter bearing no. 5373 dated 26.08.2022 but not a departmental appeal.
2- Copy of order dated 21.09.2021 mentioned in the heading of the appeal is not attached with the appeal.
3- Some documents attached with the appeal are unattested.
4- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3456 /S.T,

Dt. 26/10/2023.

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Malik Hidayatullah Mallana Adv.
S.C. of Pakistan at D.I.Khan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUAL, PESHAWAR

In service Appeal No. 2440 /2023

Muhammad Ramzan (**Appellant**) **VERSUS** **Govt. of KPK etc** (**Respondents**)

INDEX

Dated. 23 /10/2023

Your humble appellant

Muhammad Ramzan
Through counsel

Malik Hidayatullah Mallana
Advocate Supreme Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUAL PESHAWAR

Service Appeal No. 2440 /2023

Muhammad Ramzan son of Sher Afzal r/o Village Gomal Kalan Shorkot, Tehsil & District Dera Ismail Khan.
Ex-Warder

(Appellant)

VERSUS

1. **Government of KPK, Through Secretary Prisons Khyber Pakhtunkhwa Peshawar.**
2. **Inspector General Of Prisons, Khyber Pakhtunkhwa Central Peshawar.**
3. **Additional Inspector General Of Prisons, Khyber Pakhtunkhwa Central Peshawar.**
4. **Superintendent Circle Headquarters Prison Dera Ismail Khan.**
5. **Superintendent Central Prison Bannu.**

..... **(RESPONDENTS)**

APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST, FIRSTLY THE IMPUGNED ORDER NO. 6026 DATED 21/09/2021, WHEREBY THE APPELLANT WAS AWARDED MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE AND FINALLY AGAINST THE IMPUGNED ORDER NO. 36272 DATED 03/10/2023 OF APPELLANT

AUTHORITY VIDE WHICH THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED.

Note: Addresses given above shall suffice the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

Respectfully Sheweth;

1. That the appellant was inducted in KPK Prisons Department as Warder in the year 2022 at D.I.Khan and prior to the implementation of the impugned order the appellant had been serving the under the Superintendent Central Prison Bannu and since induction had been performing his duties with honesty and with great zeal. Copy of the Appointment Order is annexed as **Annexure-A**.

2. That the father of the appellant has been suffering from severe illness (Cardiac & High Blood Pressure) and is under treatment since long. On 01/08/2022, the appellant was informed telephonically that the father of appellant got seriously ill, appellant informed his superiors regarding illness of his father and left to Dera Ismail Khan immediately and appellant had to look after his father as there was no one to look after him in the house and appellant remained in Dera Ismail Khan. Copies of medical record are annexed as **Annexure-B**.

3. That, in those days, the District Dera Ismail Khan badly effected from heavy rains and flood and most of the area of district Dera Ismail Khan damaged including the village of appellant, appellant's house was also damaged due to flood and family of appellant lived in NGOs provided emergency camps under the open sky. After floods, the appellant remained in reconstruction of his house and made some new huts and shifted the family in the huts.

4. That thereafter, the appellant reported to District prison Bannue and joined his duty but after three days the respondent#5 directed the appellant to appear before the respondent#4 due to absentia from service.

5. That the appellant appeared before the respondent#4 and submitted an application in which clearly mentioned all the facts regarding illness of his father and flood damages in his village, copy of application is annexed as "**C**", but the respondent#4 without issuing any show-cause notice to the appellant, awarded major penalty to the appellant of dismissal from service vide impugned order# 6026 dated 21/09/2022. Copy of the impugned order is annexed as **Annexure-D**.

6. That appellant preferred a departmental appeal to the respondent#2 being appellate authority and disclosed all the true facts and acknowledging the real happenings with the appellant, but the appellate authority without assigning the final show cause notice and without being personally heard, confirmed the previous impugned order of respondent#4 vide his impugned order No. 36272 dated 03/10/2023. Copies of departmental appeal and order dated 03/10/2023 are annexed as **Annexure-E & F**.

7. That order#6026 dated 21/09/2021 and subsequently impugned order of the appellate authority No. 36272 dated 03/10/2023 were based on mala fide and against the law, thus, the appellant left with no other remedy, the appellant approaches this honourable tribunal seeking reinstatement in service with all back benefits in consequence of setting aside impugned orders on gracious acceptance of the instant petition on grounds hereinafter preferred.

GROUNDS

a. That the order passed by the departmental authorities i.e. respondent No. 3 & 4 impugned hereby are arbitrary, discriminatory, legally and factually incorrect, ultra virus, void ab initio and militate against principle of natural justice, thus, are liable to be set aside and mala-fide.

b. That the appellant is innocent and has been subjected to the penalty for no fault on his part. Respondents failed to regulate the departmental inquiry in accordance with law and procedures described for the purpose and as such erred at the very outset of the proceedings, thus, causing grave miscarriage of justice as well as prejudice to the appellant in making his defence.

c. That it is evident from the medical record of petitioner's father that he remained seriously ill having cardiac and high blood pressure and appellant was busy in his medical treatment and look after but the respondents did not pay any heed towards this important aspect of the case, hence, the matter needs interference by this learned Tribunal.

d. That the appellant is the elder son of his parents and all the family members are dependent upon the appellant and the said job is only source of income of appellant, hence, the impugned order amounts to financial murder of appellant and is family, hence, on this sole ground the

appellant is entitled to be reinstated into service with all back benefits.

e. That it is a matter of record that appellant has been vexed in clear defiance of law and principle laid by the superior courts as well as the tribunals as could be gathered from the facts and circumstances of the case.

f. That the appellant had sufficient length of service rendered for the department. While adjudicating the matter of departmental authority utterly ignored not only the provisions of law on the point but the rights, too, of the appellant including fringe benefits and by imposing the harshest of the penalties in defines of law as aforesaid, deprived the family of appellant of its only means of earning livelihood.

g. That the respondents while adjudicating in the matter of departmental proceedings and the appeal/representation of the appellant disposed of the entire matter in a slipshod manner through the orders impugned hereby, thus, the award of impugned punishment is patently unwarranted, illegal, ultra virus, nullity in law and apparently motivated for extraneous reasons and is not maintainable in law.

h. That the petition of appeal is duly supported by law and rules formulated there under, besides the affirmation/affidavit annexed hereto.

i. That this honourable Tribunal is competent and has ample powers to adjudge the matter under reference/appeal.

j. That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

In wake of submission made above applicant humbly requested that the impugned* order#6026 dated 21/09/2021 and subsequently impugned order of the appellate authority No. 36272 dated 03/10/2023 *may please be set aside and the applicant may graciously be reinstated in service with all back benefits.

Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

Dated. 23 /10/2023

Your humble appellant

Muhammad Ramzan

Through counsel

Malik Hidayatullah Mallana
Advocate Supreme Court
Dera Ismail Khan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUAL PESHAWAR

In service Appeal No._____/2021

Muhammad Ramzan (Appellant)	**VERSUS**	**Govt. of KPK etc (Respondents)**

CERTIFICATE

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.

Dated ___/10/2023

Appellant

NOTE

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

Dated.23/10/2023

Appellant's counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUAL PESHAWAR

In service Appeal No._____/2023

Muhammad Ramzan **VERSUS** IG Prisons KPK etc
(Appellant) **(Respondents)**

AFFIDAVIT

I, **Muhammad Ramzan**, appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following our instructions;
2. That all para-wise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.

Dated.23/10/2023

DEPONENT
CNIC # 12101-5936437-9

Identified By:-

Malik Hidayatullah Mallana
Advocate Supreme Court,

OFFICE OF THE
SUPERINTENDENT
HEADQUARTERS PRISON D.I.KHAN
No: 4776 /HQ Dt: 20/07/2022

Annex. A
(10)

OFFER OF APPOINTMENT:-

Upon recommendations of the Departmental Selection Committee, the below noted candidates are hereby appointed against the post of warder BPS-07 in the Khyber Pakhtunkhwa Prisons Department BPS-07 (16310-910-43610) plus other usual admissible allowances:-

S.No	Name	Father Name	CNIC	Domicile
01	MUHAMMAD SALMAN KHAN	HAMID ULLAH KHAN	1210191993505	D.I.Khan
02	MUHAMMAD BILAL	RAB NAWAZ	1210193133133	D.I.Khan
03	IKRAM ALI	MUHAMMAD RAMZAN	1210189260419	D.I.Khan
04	MUHAMMAD ASIF	AZMAT	1210145149941	D.I.Khan
05	SIFAT ULLAH	NAIMAT ULLAH	1210354918405	D.I.Khan
06	MUHAMMAD ZESHAN	HAMEED ULLAH KHAN	1210182999709	D.I.Khan
07	SHAHID ULLAH	ABDUL HANAN	1210156413107	D.I.Khan
08	MUHAMMAD SAEED	FALAK SHER	1210308916733	D.I.Khan
09	MUAINUDDIN	ALLA UDDIN	1210330206747	D.I.Khan
10	ASEER ULLAH	MATI ULLAH	1210346211567	D.I.Khan
11	MUHAMMAD NIZAM UD DIN	AMIR ABDULLAH	1210388746943	D.I.Khan
12	MUHAMMAD SULEMAN	MALIK BASHIR AHMAD	1210503716607	D.I.Khan
13	MUHAMMAD SHOAIB	MUHAMMAD YAQOOB	1210336659071	D.I.Khan
14	AHMAD ULLAH	KALA KHAN	2230149682599	D.I.Khan
15	MUHAMMAD SHOAIB	ALLAH WASAYA	1210335548575	D.I.Khan
16	UMAR KHITAB	BASHIR AHMAD	1210503729009	D.I.Khan
17	AMEER HAMZA	QAISER KHAN	1210128324947	D.I.Khan
18	MUHAMAMD RAMZAN	SHER AFZAL	1210159364379	D.I.Khan
19	GUL ZAMAN	FAIZ MUHAMMAD	1210168279245	D.I.Khan
20	NAVEED UR REHMAN	ABDUL REHMAN	1210167366207	D.I.Khan
21	MUHAMMAD EHTASHAM	GHULAM SHABIR	1210182392193	D.I.Khan
22	MUHAMMAD FAROOQ	ABDUL LATIF	1210336541113	D.I.Khan
23	SHAHAM WASEEF	ABDUL GHAFFAR	1210113529105	D.I.Khan
24	NOMAN IJAZ	MUHAMMAD RAMZAN	1210119187449	D.I.Khan
25	MUHAMMAD WASEEM	WAZIR AHMAD	1210138007571	D.I.Khan

Attested

OFFICE OF THE
SUPERINTENDENT
HEADQUARTERS PRISON D.I.KHAN
No: _____/HQ Dt: ___/___/2022

(11)

26	MUHAMMAD NOMAN	REHMAT ULLAH	1210313792809	D.I.Khan
27	UMAR FAROOQ	SAMI ULLAH	1210108908385	D.I.Khan
28	IKRAM KHAN	SALAH UD DIN	1210107160195	D.I.Khan
29	ABRAR KHAN	BASHAHMIR KHAN	1110184430161	Bannu
30	RAHIM ULLAH KHAN	SULTAN AYAZ KHAN	1110125419421	Bannu
31	AFAQ REHMAN	REHMAN GUL	1110174056457	Bannu
32	ZAHOOR AHMAD	SARFARAZ KHAN	1110193704731	Bannu
33	WAHEED ULLAH KHAN	BANARAS	1110114714887	Bannu
34	SHAH FAHAD	SHAH ALAM KHAN	1110203733753	Bannu
35	MUHAMMAD FAHIM KHAN	SYED RAHMAN	1110106445607	Bannu
36	SAFIR ULLAH	ASMAT KHAN	1110116662173	Bannu
37	HIDAYAT ULLAH KHAN	SILANI KHAN	1110138930795	Bannu
38	HANEEF ULLAH KHAN	SHER BAHADER KHAN	1110150611955	Bannu
39	AHMAD KHAN	YOUSAF KHAN	1110105745699	Bannu
40	SHAHAB UD DIN	UMER NAWAZ KHAN	1110151032307	Bannu
41	RAHIM ULLAH	MOSIL KHAN	1110203590727	Bannu
42	MUHSIN KHAN	RAHMAT ULLAH KHAN	1110193113399	Bannu
43	SAFI ULLAH KHAN	NIAZ ALI KHAN	1110143961535	Bannu
44	HAROON RASHID	KHAN GUL	1110203534569	Bannu.
45	NADEEM ULLAH KHAN	MUHAMMAD SHARIF KHAN	1110118947015	Bannu
46	MEHRAN KHAN	CHANGEZ KHAN	1110141727733	Bannu
47	WAHID ULLAH KHAN	HAYAT ULLAH KHAN	1110148892413	Bannu
48	SHAHID ULLAH KHAN	SAKHI MARJAN	1110150023419	Bannu
49	DOST MUHAMMAD KHAN	GUL ANDAZ KHAN	1110158067165	Bannu
50	SALMAN KHAN	ALI ZAMAN	1110186887601	Bannu
51	MUHAMMAD KAMRAN	MIR ZALI KHAN	1110119423953	Bannu
52	NISAR KHAN	HAZRAT USMAN	1110203477739	Bannu
53	FASIH ULLAH KHAN	SHAIF ULLAH KHAN	1110146281305	Bannu.
54	MUHAMMAD TAHIR	KHADIM KHAN	1110194837755	Bannu
55	WAQAR ULLAH	AMAR ALI KHAN	1110160333117	Bannu
56	AFNAN KHAN	RAQEEB KHAN	1110187080599	Bannu
57	RAHMAT ALI SHAH	QUDRAT ALI SHAH	1110193069691	Bannu
58	MUHAMMAD NASIR	AKRAM KHAN	1110203676263	Bannu
59	SHADMAN KHAN	SANA ULLAH JAN	1110148132369	Bannu

OFFICE OF THE
SUPERINTENDENT
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No: _____/HQ Dt: ___/___/2022

(12)

60	HALIM ULLAH SHAH	MIR AFZAL SHAH	1110164283267	Bannu
61	RAHIM ULLAH KHAN	SHAH BARAZ KHAN	1110148000273	Bannu
62	ZIAF ULLAH KHAN	MUHAMMAD HAYAT	1110156521625	Bannu
63	HAMID KHAN	MUNAWAR KHAN	1110179173553	Bannu
64	UMER HAYAT KHAN	NIAZ ALI KHAN	1110156034233	Bannu
65	QADIR KHAN	MUHAMMAD NAWAZ KHAN	1110106903693	Bannu
66	SAJID SHAH	AKHTAR RIAZ SHAH	1110187250801	Bannu
67	AFNAN KHAN	UMER AYAZ KHAN	1110128343119	Bannu
68	AWIS AHMAD	AYOUB NAWAZ KHAN	1110185412501	Bannu
69	USMAN ULLAH	WALI RAHMAN	1110203487533	Bannu
70	MUHAMMAD LUQMAN KHAN	SHEIKH FARID	1110203499627	Bannu
71	SAJID KHAN	ZAR GUL KHAN	1110132336323	Bannu
72	AMIR KHAN	MUHAMMAD ISRAR	1110203581275	Bannu
73	WAHEED ULLAH	SAIDAR AZAM KHAN	2170241157837	S.W.A
74	MUHAMMAD UMAIR	NAJEEB ULLAH	1210174441271	S.W.A
75	SHAFIQ ULLAH	STANI DAR KHAN	2170798151139	S.W.A
76	ALTAF REHMAN	NEK NAWAZ KHAN	1110111010667	N.W.A

Terms & Conditions:-

1. Their appointment as **Warder (BPS-07)** is subject to medical fitness.
2. Their appointment will take effect from the date of joining duty at their place of posting.
3. They will be on probation for a period of one year, in terms of Section 6(i) of Khyber Pakhtunkhwa Civil Servants Acts, 1973 read with Rule 15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989 which is extendable upto another year with the specific orders of the appointing authority within two (02) months of the expiry of 1st year of probation period as specified in rules 15(2) of the rules ibid. During probationary period their services will be liable to termination without any notice if their work and conduct is not found satisfactory or the post against which they have been appointed ceases to exist.
4. They will be liable to serve anywhere in the Prisons Department in the Khyber Pakhtunkhwa.

OFFICE OF THE
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No: _____/HQ Dt: ___/___/2022

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5. For all other purposes such as Pay, T.A and Medical Attendance etc they will be governed by Rules applicable to the Government Servants of their category.
6. They will be governed by all Rules and Regulations contained in the Khyber Pakhtunkhwa Prison Rules, Civil Servants Rules, the Khyber Pakhtunkhwa Government Servants (Conduct) Rules, 1987, Punishment and Appeal Rules 1986, the Khyber Pakhtunkhwa Civil Servant Act 1973, the Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 and any other rules existing or to be framed by the Government from time to time.
7. In case any of them wishes to resign at any time he will give one month's notice OR in lieu thereof one month's pay will be forfeited from him, subject to the discretion of the competent authority in the public interest and will leave the services after acceptance of his resignation.
8. No TA/DA will be admissible on joining of their first appointment.
9. **Their services will be liable to termination at any stage if their certificates/Degrees/CNIC/Domicile and any other relevant documents / certificates are found fake, their services will be considered as terminated automatically and FIR will be lodged against them.**
10. Their monthly salaries shall be released after verification of their character roll, domicile certificate and Academic Qualification Certificates and Degrees (if any) etc; from quarter concerned. Verification fee etc; of certificates/degrees on this account will be paid by them.

If they accept the offer of appointment on the above terms and conditions, they should report to the **Superintendent Central Prison Bannu** within thirty (30) days of the receipt of this offer of appointment at their own expenses, failing which offer of appointment will be treated as cancelled /withdrawn.

20/7/022

SUPERINTENDENT
CIRCLE HEADQUARTERS PRISON
D.I.KHAN

ENDST;NO. 4777-80/.,

Copy of the above is forwarded to:-

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.

OFFICE OF THE
SUPERINTENDENT
HEADQUARTERS PRISON D.I.KHAN
No: _____/HQ Dt: ___/___/2022

(14)

2. The **Superintendent Central Prison Bannu**, for information. On arrival of the above named appointees an undertaking on judicial stamp paper, may be obtained from them to the effect that they have accepted all terms and conditions contained in the offer of their appointment and submitted to this office for record. Condition No.10 above must be fulfilled before releasing their monthly salary within shortest possible time.

3. District Accounts Officer Bannu.
4. **Appointee concerned**

20/7/022

SUPERINTENDENT
CIRCLE HEADQUARTERS PRISON
D.I.KHAN

Attested

Annex: B

(15)

Physician / Medical Specialist

Dr. Imtiaz Ahmad

M.B.B.S, M.C.P.S (G. MEDICINE)
M.P.H, M.A.C.P

PMDC NO: 4891-N

فزیشن/میڈیکل سپیشلسٹ

ڈاکٹر امتیاز احمد

ایم بی بی ایس۔ ایم سی پی ایس (جنرل میڈیسن)
ایم پی ایچ۔ ایم اے سی پی

P. Name _____ Age _____ Sex _____ Date 7/9/23

Clinical Record

Rx

Not Valid for Court

Cap. Fast
Inj. Alcomin
Inj. Zofoxic
Tab. Nullind
Syp. Spasghul Hook
Tab.

دوبارہ معائنہ کی تاریخ

Assistant: 0349-9013648, 0346-7847793
0335-2553500

گیلانی میڈیکل سنٹر، حمزہ میڈیکل سٹور بالمقابل نیو ایمرجنسی ڈسٹرکٹ ہیڈکوارٹر ہسپتال ڈی آئی خان

(16)

Dr.
MUHAMMAD ADNAN GANDAPUR
MBBS, FCPS (Medicine) II
MEDICAL SPECIALIST
DHQ Hospital, Dera Ismail Khan
Contact No: 0[redacted]
034393/6209

هوالشافی

Not Valid For Court

ڈاکٹر محمد عدنان گنڈہ پور
ایم بی بی ایس، ایف سی پی ایس (میڈیسن) II
میڈیکل سپیشلسٹ
ڈی ایچ کیو ہسپتال ڈی آئی خان
ماہر امراض: دل، بلڈ پریشر، معدہ، جگر، یرقان، شوگر، ملیریا، ٹائیفائیڈ

Patient Name Sher Afzal Age 63yrs Sex M Date 25/1/22

Clinical Record

c/c
1) Rt. flank/Lumbar pain
2) Vomiting
3) Burning Micturition

O/E
pulse — 78/min
B.P — 130/80

Adv
- Urine R/E
- CBC
- S. Uric Acid

Rx

- Tab Efflex 500mg
  ① روزانہ 10 دن
- Syp Cran-Max 4ml
  ① بروز — 2+2+2
- Tab Tonoflex-P
  ⑤ دن — 1+1
- Cap Sildat 25mg
  ① روزانہ ② بروز
- Syp HiLgas
  ① بروز — 2+2

کلینک ایڈریس: [redacted] میڈیکل سنٹر بالمقابل ڈی ایچ کیو ہسپتال ڈیرہ اسماعیل خان

(17)

علاج کو سنت کر
کر اختیار کیا کرو

بسم اللہ الرحمن الرحیم

وَإِذَا مَرِضْتُ فَهُوَ يَشْفِينِ

صلاۃ حاجات اور صدقات
سے بیماریوں کا علاج کیا کرو

S No: 799

Neurosurgen

Dr.Raza Aman Bettani

M.B.B.S, F.C.P.S
(Neurosurgery)
District Neurosurgen DHQ Hospital D.I.Khan
PMDC No. 9876-N
Fellow Ship No. NSG-14-14965

Neurosurgery Clinic

19 SEP 2022

Patient's Name: شہزاد علی Address: Age: 55y Sex : M Date:

NOA
Up.
Cu
In
Cl
Lu

R. Amoxicillin 500
res
B Paracetamol 500
res
Cap. Dolosal 50
res
Metamie
Zylori 300
Cap Pantop 20
res

Ad
Xray Cervical
Xray Lat - Lumbar Lumbar
Xray Lat - Sacrum

نیورو سرجن

دوبارہ معائنہ ---------- دن بعد ہوگا۔

تعطیل بروز جمعۃ المبارک

ڈاکٹر رضا امان بیٹنی

کلینک: خیبر میڈیکل کمپلیس
بالمقابل پرانا ٹی بی ہسپتال ڈیرہ اسماعیل خان
فون نمبر: 0966-717172

ایم بی بی ایس۔ ایف سی پی ایس (نیورو سرجری)
سرٹیفکیٹ نیورو سرجن ڈسٹرکٹ ہیڈ کوارٹر ہسپتال ڈی آئی خان

Not Valid For Court

(18)

Associate

Professor Dr. Syed Zahid Hussain Shah Bukhari

MBBS (Pb)
FCPS (Neurosurgery)
BRAIN & SPINE SURGEON
Nishtar Medical University Hospital
Multan

ایسوسی ایٹ

پروفیسر ڈاکٹر سید زاہد حسین شاہ بخاری

ایم بی بی ایس (پنجاب)
ایف سی پی ایس (نیوروسرجری)
[illegible]
نشتر میڈیکل یونیورسٹی ہسپتال ملتان
[illegible]

هو الشافی

Name Jher Afzal Age _____ Sex M Date 24/09/2004

Rx

(hist pain
(L) 4/L
(pain
Hemiparesthesia
Hypo
nil

(AV)
CBC
Urinal
ABG

CA0880242

Dr.
Farid Ullah Khan
M.B.B.S (KMC), F.C.P.S (Cardiology)
Interventional Cardiologist
Assistant Professor
Specialized in Heart Diseases, Angiography
Angioplasty.

Only for Treatment Purpose

ڈاکٹر فرید اللہ خان
ایم بی بی ایس۔ایف سی پی ایس
کنسلٹنٹ انٹرونشنل کارڈیالوجسٹ
اسسٹنٹ پروفیسر
ماہر امراض: دل، انجیوگرافی، انجیو پلاسٹی

(19)

Patient Name: SHER AFZAL Age: Date: 19/4/21

Clinical Record

DM
HTN
FH
Smoking
LIPIDS

Vitals + Physical Examination

Past Hx:

INVESTIGATION

Diagnosis/DID

PLAN

Next Visit:-

IMPROVEMENT:-

مشورہ برائے سینہ چھاتی درد، سانس کی دشواری، دل کے پٹھوں کی کمزوری، بلڈ پریشر، شوگر، انجائنا، ہارٹ اٹیک، دل کی دھڑکن کی بے ربطی، دل کے والو کی خرابی، ہائی کولیسٹرول، انجیوگرافی

(20)

Doctor

Farid Ullah Khan

MBBS (KMC), FCPS (Cardiology)
Interventional cardiologist
Assistant Professor
Specialized in Heart Diseases Angiography, Angioplasty

ڈاکٹر فرید اللہ خان
ایم بی بی ایس، ایف سی پی ایس
کنسلٹنٹ انٹرونیشنل کارڈیالوجسٹ
اسسٹنٹ پروفیسر
ماہر امراض دل، انجیوگرافی، انجیوپلاسٹی

ECHOCARDIOGRAPHY REPORT

Name: SHER AFZAL	Age/Sex:	Date: 14 April 2021
Referred By: Dr	Indication:	

Parameter	Result	Normal	Parameter	Result	Normal
Aortic Root	26	22-40 mm	*Left Ventricle*		
Annulus Ao/PV			Diastolic Dimensions	43	36-56 mm
LA	28	19-39 mm	Systolic Dimensions	24	25-41mm
LA area		≤ 20 cm²	Interventricle Septum	10	8-12 mm
RV	18	7-26 mm	E.F	60%	55-75%
TAPSE		≥ 17 mm	F.S	31%	27-45%
MV Area (planimetry)		4-6 cm²			

Doppler

RVSTDI : 12

E/A ratio 0.99

DT : 172msec

AVPG : 9mmHg

TVPG:

Color Doppler:

FINDINGS:

LEFT VENTRICLE: Left ventricular chamber size is normal with normal wall thickness and normal systolic function with ejection fraction of 60%.Segmental wall motion shows no abnormality. Grade 1 diastolic dysfunction

RIGHT VENTRICLE: Right ventricular chamber size was normal with normal wall thickness. Normal right ventricular systolic function with no evidence of pulmonary hypertension.

MITRAL VALVE: Mitral valve appears normal is structure. Normal mobility of the mitral leaflets.

TRICUSPID VALVE: Normal mobility of the tricuspid leaflets with no tricuspid regurgitation.

AORTIC VALVE: Aortic valve appears tricuspid in structure and demonstrates normal cusp mobility. No significant aortic stenosis or regurgitation.

PULMONIC VALVE: Pulmonic valve appears normal in structure and function.

AORTA: The aorta appeared to be normal. The aortic root and the ascending aorta are all normal in size with no evidence of coarctation.

LEFT ATRIUM: Left atrium was normal in size with no masses.

RIGHT ATRIUM: The right atrium was normal in size with no masses.

PERICARDIUM: Normal pericardium. No pericardial effusion.

IAS & IVS: Both IAS and IVS are intact with no shunt across
No mass, vegetation and thrombus seen

CONCLUSIONS:

- **Normal Biventricular systolic function.**

Dr.Farid Ullah Khan
MBBS (KMC), FCPS(Cardiology)

(21)

خیبر میڈیکل کمپلیکس بالمقابل پرانا ٹی بی ہسپتال روڈ ڈیرہ اسماعیل خان
Reception: Ph: 0966-717172, 0966-717182
Reception: Mob: 0307-1750004, 0308-1750004
Email: medicalkhyberkmc@gmail.com
Website: www.kmcdikhan.com

خیبر میڈیکل کمپلیکس
KHYBER MEDICAL COMPLEX

Visit No: O22-0022813

M.R.N: 000-0913-50

Lab No:	5452	Registration Date:	19-Sep-2022 5:30 pm
Patient Name:	SHER AFZAL	Reporting Date:	19-Sep-2022 5:51:54PM
Father/Husband Name:		Ward /Room #:	OPD
Age / Sex:	63 Year (s) /Male	Reference:	
Phone:	2252	Refered By:	Dr Raza Aman Bettani

Routine Chemistry

TEST	NORMAL VALUE	UNIT	RESULT O22-0022813 19-Sep-2022 5:30 pm
URIC ACID (SERUM)	3.5 - 7.2		7.2

Electronically verified report. No signature(s) required. Not valid for any court.
Lab test results should be interpreted by a physician in the context of clinical findings

Dr. Muhammad Ihsan Khan
M.B.B.S, Ayub Medical College
RMP, Islamabad
Consultant Heamatologist

Habib Ullah
(MLT) KP, MFP
Senior Technologist

Owais Khan
(MLT), KP, MFP
Senior Technologist

Assistant
Prof. Dr. Gohar Ali Arshad
M.B.B.S, M.C.P.S, F.C.P.S
ASSISTANT PROFESSOR
Nishtar Medical College & University Multan
CONSULTANT PHYSICIAN
& MEDICAL SPECIALIST
goharaliphysician@gmail.com

هوالشافی

(22)

پروفیسر ڈاکٹر گوہر علی ارشد
ایم۔بی۔بی۔ایس، ایم۔سی۔پی۔ایس، ایف۔سی۔پی۔ایس
اسسٹنٹ پروفیسر نشتر میڈیکل کالج و یونیورسٹی ملتان
کنسلٹنٹ فزیشن اینڈ میڈیکل سپیشلسٹ

ماہر امراض ... دہ، جگر، پیپا ٹائٹس (کالا یرقان بی اینڈ سی) شوگر، لقوہ، فالج، رعشہ، اعصاب، سر درد، دمہ، ٹی بی، مرگی، بلڈ پریشر، جوڑوں کا درد، گنٹھیا، گردہ

Patient Name ..... Date .....

Rx

(23)

FATIMA
CLINICAL LABORATORY

Opp. Emergency Gate Kamboh Medical Hall Wali Gali, Nishtar Road, Multan.

فاطمہ کلینیکل لیبارٹری

ای گیٹ کمبوہ میڈیکل ہال والی گلی نشتر روڈ ملتان

0307-7343882, 0303-755

Patient Name : M AFZAL
Lab.No. : 151
Ref. By : SELF

Age : 45 Years Sex
Date. : 12-10-2020

RENAL FUNCTION TESTS:

TESTS	VALUE	UNITS	NORMAL VALUE
Serum Creatinine	1.1	Mg/dl	0.3 - 1.5

H PYLORI

TEST	RESULT
H PYLORI	POSITIVE

Electronically Verified Reported, No Signature (s) Required

Dr. Muhammad Akram Sahad Chisthi
M.B.B.S., D.C.P., M.Phill. (Gold Medalist)
Ex. Professor & Head of Department Pa
Nishtar Medical College & Hospital Mul

(24)

Assistant
Prof. Dr. Gohar Ali Arshad
M.B.B.S, M.C.P.S, F.C.P.S
ASSISTANT PROFESSOR
Nishtar Medical College & University Multan
CONSULTANT PHYSICIAN
& MEDICAL SPECIALIST
goharaliphysician@gmail.com

هوالشافی

پروفیسر ڈاکٹر گوہر علی ارشد
ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس
اسسٹنٹ پروفیسر نشتر میڈیکل کالج و یونیورسٹی ملتان
کنسلٹنٹ فزیشن اینڈ میڈیکل سپیشلسٹ

ماہر امراض معدہ، جگر، ہیپاٹائٹس (کالا یرقان بی اینڈ سی) شوگر، لقوہ، فالج، رعشہ، اعصاب، سر درد، دمہ، ٹی بی، مرگی، بلڈ پریشر، جوڑوں کا درد، گنٹھیا، گردہ

Patient Name ..... M ..... Date .....

Rx

- TAB ANSAR
- TAB Pelmic
- TAB Lomplat
- TAB Pelmic
- TAB Neupvem
- TAB Eucalmin
- TAB VERZ

دوبارہ معائنہ کی تاریخ .....

ارشد کلینک دکان نمبر 1 (پہلی دکان) دوست پلازہ نشتر روڈ ملتان

اوقات کار: دوپہر 3 سے رات 11 بجے

ٹائم لینے کیلئے اس نمبر پر رابطہ کریں **0301-7203615**

Not Valid For Any Court of Law

Annex: C

(25)

Attested

Accounts

(26)

Attested

(27)

OFFICE OF THE SUPERINTENDENT
PRISONS CIRCLE HEAD QUARTER D.I.KHAN
No. 6026 / PB Date 21-09-2022
PH&FAX \No. 0966-9280299
cpdikhan1@gmail.com

Annex: D

KPKP

OFFICE ORDER

WHEREAS, newly recruited Warder Muhammad Ramzan s/o Sher Afzal attached to Central Prison Bannu absented himself from duty as well as jail premises w.e.f 02.08.2022 without any permission of the competent authority.

AND WHEREAS, notice was sent on his home address vide No. 5373 dated 26.08.2022 to resume duty with in 15 days.

AND WHEREAS, he was contacted on his Cell Phone on dated 16.09.2022 and 19.09.2022 to appear for personal hearing before the Superintendent Circle Headquarter Prison D.I.Khan.

AND WHEREAS, no reply was received from the concerned warder nor he resumed duty at Central Prison Bannu.

NOW therefore, Services of newly recruited Warder Muhammad Ramzan s/o Sher Afzal attached to Central Prison Bannu are hereby terminated (being probationer) for his willful absence from duty as well as jail premises with effect from 02.08.2022 to 20.09.2022.

SUPERINTENDENT
CIRCLE HQS PRISON D.I.KHAN

Attested

Endst: No. 6027-28 Dated: 21/09/2022.

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
2. The Superintendent Central Prison Bannu for information and necessary action
3. The District Accounts Officer Bannu for information and necessary action.

SUPERINTENDENT
CIRCLE HQS PRISON D.I.KHAN

(28)

Annex: E

بخدمت جناب والاشان انسپکٹر جنرل آف جیلخانہ جات ضلع پشاور ۔

درخواست بمراد: رحم و جواب غوثش ٹرمینیشن لیٹر نمبر 5373/26-8-022

جناب عالی

مؤدبانہ التماس ہے کہ سائل مورخہ 2/8/022 کو بوجہ مجبوری بیماری والدہ بزرگوار غیر حاضر ہوا تھا، سائل کی یہ غیر حاضری قصداً نہیں تھی کیونکہ والدہ بزرگوار بلڈ پریشر اور دل کے مریض ہیں والد صاحب کا بلڈ پریشر جب انتہائی ہو چکا تھا اور انتہائی بلڈ پریشر سے دماغ کی رگ پھٹنے اور موت کے واقع ہونے کا اندیشہ تھا سائل کی غیر حاضری قصداً نہیں تھی گھر پر کوئی معقول سرپرستی کرنے والا نہیں تھا سائل اپنے والدین کا بڑا بیٹا ہے اور وارث ہے بلڈ پریشر کے ساتھ ہارٹ اٹیک کا بھی خطرہ تھا خدمت اور علاج معالجے والا کوئی نہیں تھا، والد کا سایہ سر سے اٹھنے کا سخت اندیشہ تھا ان حالات میں لازمی ہو گیا کہ حاضری سے ضروری والد کی خدمت اور انکو سہارا دوں، سائل نے حاضری بنوں کی تھی مگر ڈیوٹی نہیں دی گئی اسلئے استدعا ہے کہ سائل پر رحم فرماتے ہوئے غیر حاضری کو معاف فرما حاضری کے احکامات صادر فرماویں سائل نہایت غریب فیملی کا واحد کفیل ہے

آپکے حسن غوازش ہوگی فقط مورخہ: 19/9/023

المعارض

سائل کیپٹن محمد رمضان ولد شیر افضل سکنہ گومل کلاں شیر کوٹ ڈاکخانہ VPM نمبر 1 ضلع ڈیرہ اسماعیل خان MNo: 03452630768.

Attested

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
091-9210334, 9210406 091-9213445

(29)

No.Estb/Ward-/Orders/ 36272 /- Annex: F
Dated 23 - 10 - 2023 /-

ORDER:

WHEREAS, Ex-Warder Muhammad Ramzan S/o Sher Afzal (being probationer), while attached to Central Prison Bannu was awarded the major penalty of "Termination from Service" by Superintendent Circle Headquarters Prison D.I Khan vide Order No. 6026 dated 21-09-2022 due to his misconduct / willful absence w.e.f 02-08-2022 to 20-09-2022.

AND WHEREAS, the said Ex-Warder preferred his departmental appeal for setting aside the penalty awarded to him and also requested for reinstatement in service.

AND WHEREAS, his appeal was examined in light of the available record of the case and it was observed that the penalty was awarded to him by the competent authority due to his misconduct / willful absence after observing all legal and codal formalities as required under Government Servants (Efficiency & Discipline) Rules, 2011. Moreover, the appeal was filed on 22-09-2023 and is time barred by 11 months and 01 day.

NOW THEREFORE, having considered the charges, evidences / facts on record, explanation of the accused official in his appeal, the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 read with Rule-05 of Khyber Pakhtunkhwa Service Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being without any facts / substance and badly time-barred.

ADDL; INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR

ENDST; NO. 36273 — 76 /-

Copy of the above is forwarded to the:

1. Superintendent, Headquarters Prison D.I Khan for information and necessary action w/r to his order referred to above.
2. Superintendent, Central Prison Bannu for information and necessary action with reference to the Superintendent HQ Prison D.I.Khan order referred to above. He is directed to inform the appellant accordingly and also to make necessary entry in his Service Book under proper attestation.
3. Muhammad Ramzan S/o Sher Afzal, Ex-Warder, R/o Gomal Kalan, Shor Kot, P.O V.P.M No. 01 D.I Khan (Cell# 0345-2630768) for information.
4. PS to I.G Prisons Khyber Pakhtunkhwa Peshawar.

Attested

DEPUTY DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

KHYBER PAKHTUNKHWA
BAR COUNCIL

MALIK HIDAYAT ULLAH MALLANA
Advocate
bc-09-0858
Date of issue: January 2022
Valid upto: January 2025

Secretary
KP Bar Council

ENROLLED ADVOCATE HIGH COURT

(30)

وکالت نامہ

کورٹ فیس

بعدالت جناب چیئرمین خیبر پختونخواہ سروس ٹریبونل پشاور

منجانب اپیلانٹ

بنام محمد رمضان

حکومت KPK وغیرہ

دعویٰ یا جرم سروس اپیل

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

کیلئے D. I. Khan

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جواب دہی برائے پیشی یا تصفیہ مقدمہ بنام

ملک ہدایت اللہ ملانہ ایڈووکیٹ سپریم کورٹ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بذریعہ روبرو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا ہرجانہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسٹائے ڈگری نظر ثانی اپیل نگرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور ہر ثالثی یا راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از کچہری صدر پیروی مقدمہ مزکور نظر ثانی اپیل و نگرانی و برآمدگی مقدمہ یا منسوخی ڈگری یک طرفہ یا درخواست حکم امتناعی یا قرقی یا گرفتاری قبل از فیصلہ اجرائے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ محنتانہ پیروی کا اختیار ہوگا اور تمام ساختہ پرداختہ صاحب موصوف مثل کردہ از خود منظور و قبول ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل نگرانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ایسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہرجانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہٰذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

مورخہ 23 ماہ اکتوبر 2023ء

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

العبد

العبد

العبد

Attested & Accepted

محمد رمضان ... اپیلانٹ