

20.06.2016

Counsel for the appellant and Mr. Akhtar Zaman, ADHO alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Counsel for the appellant requested for adjournment. To come up for final hearing on 18.07.2016 before D.B at camp court, Abbottbad.



Member


Chairman
Camp Court, A/Abad.

18.07.2016

Clerk of counsel for the appellant and Mr. Ahmad Zaman, Assistant alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. Last opportunity granted. To come up for final hearing on 21.09.2016 before D.B at camp court, Abbottabad. Status quo be maintained

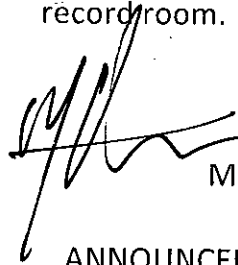

Member

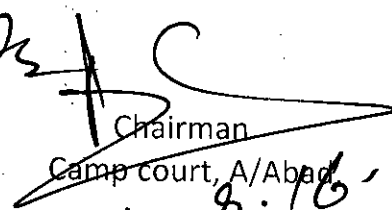

Chairman
Camp court, A/Abad,

21.09.2016

Appellant in person and Mr. Amjad Ali, Assistant alongwith Mr. Muhjammad Siddique Sr.GP for the respondents present. Appellant submitted application for withdrawal of the appeal as grievances of the appellant have been redressed vide office order dated 04.08.2016 copy whereof is placed on record.

In the light of application and submission of the appellant, the appeal is dismissed as withdrawn. File be consigned to the record room.


Member


Chairman
Camp court, A/Abad.
21.09.16

ANNOUNCED
21.09.2016

15.02.2016

Appellant in person, and Mr. Ahmad Zaman, Assistant alongwith Mr. Muhammad Saddique, Sr.G.P for respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. To come up for final hearing before D.B on 14.03.2016 at Camp Court A/Abad. Status-quo be maintained.




Member



Chairman
Camp Court A/Abad

14.03.2016


Mr. Shafqat Mahmood, husband of the appellant and Mr. Ahmad Zaman, Assistant alongwith Mr. Muhammad Saddique, Sr.G.P for respondents present. Arguments could not be heard due to non-availability of D.B. Adjourned for final hearing before D.B to 19.4.2016 at Camp Court A/Abad. Status-quo be maintained.



Chairman
Camp Court A/Abad

19.04.2016

Appellant in person and M/S Muhammad Arshad, SO and Ahmad Zaman, Asstt. DHO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Due to non-availability of D.B arguments could not be heard. To come up for final hearing on 20.06.2016 before D.B at camp court, Abbottabad. Status quo be maintained.



Chairman
Camp court, A/Abad

17.09.2015

Appellant with counsel and Mr. Muhammad Tahir Aurangzeb, GP for respondents present. Rejoinder not submitted. Due to non-availability of D.B, arguments could not be heard. Adjourned to 21.10.2015 for rejoinder and final hearing before D.B at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad


21.10.2015

Appellant in person and Mr.Ahmad, Assistant for respondent No.3, alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Due to non-availability of D.B, arguments could not be heard. To come up for rejoinder and final hearing before D.B on 17.12.2015 at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad.

17.12.2015

Mr. Shafqat husband of the appellant and Mr. Ahmed Zaman, Assistant Mr. Muhammad Siddique, Sr.GP for respondents present. Rejoinder submitted. Due to non-availability of D.B, appeal to come up for final hearing before D.B on 15.2.2016 at Camp Court A/Abad. Status-quo be maintained.



Chairman
Camp Court A/Abad

14.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Junior PHC Technician in BHU Tofkian when transferred to BHU Najafpur vide impugned order dated 30.4.2015 regarding which appellant preferred departmental appeal on 13.5.2015 which was rejected on 16.6.2015 and hence the instant service appeal on 14.7.2015.


That the impugned order of transfer is pre-mature and against the posting/transfer policy and that the appellant has been transferred four times in a short span of one year. That the order of attachment of salary of the appellant is malafidely passed with intention to pressurise the appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 18.8.2015 at Camp Court Abbottabad as the matter pertains to the territorial limits of Hazara Division. Notice of stay application be also issued for the date fixed. Status-quo be maintained.


Chairman

18.08.2015

Appellant with counsel, M/S Yasir Rehman, Litigation Clerk and Imran Khan, Coordinator IVM alongwith Mr. Muhammad Tahir Aurangzeb, GP for respondents present. Written reply submitted by respondent No.1 to 3. The learned GP relies on the same on behalf of respondent No.4. The appeal is assigned to D.B for rejoinder and final hearing for 17.09.2015. at camp court A/Abad. Status-quo be maintained.


Chairman
Camp Court Abbottabad



Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 810/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	14.07.2015	<p>The appeal of Mst. Lubna Andaleeb presented today by Shahida Javed Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> REGISTRAR</p>
2	14.07.15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>14.07.15</u>.</p> <p> CHAIRMAN</p>

(2)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 810/2015

Mrs. Lubna Andleeb *V/S*

Government of K.P.K. through
Secretary Health Services K.P.K. Peshawar
and others.

APPEAL U/S 4 OF THE K.P.K. SERVICE TRIBUNALS ACT 1974.

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(3)	Application for the issuance of directions for the release of salary with affidavit.	-	12-13
(4)	Copy of appointment letter of the appellant.	"A"	14
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(6)	Copy of transfer Order dated 24-07-2014.	"C"	17
(7)	Copy of letter dt. 27-10-14, issued to the appellant.	"D"	18
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(11)	Copy of an Explanation issued by Respondent No. 3. <i>01-6-15</i>	"H"	27
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Dated: *8 / 7* 2015.

Lubna Andleeb

Appellant
Lubna Andleeb

Through Counsel:

Shahida Javed
(SHAHIDA JAVED)
Advocate High Court
At Haripur.

(3)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

Appeal No. 810/2015

Mrs. Lubna Andleeb D/O Masood Ahmed,
Junior PHC Technician (MP)/FMT BHU Tofkian,
Resident of Village Pind Muneem, Post Office Bandi Muneeb,
Tehsil and District Haripur.

**A.W.P. Province
Service Tribunal**

Diary No. 845

Dated 14-7-2015

APPELLANT

V E R S U S

- (1) Government of K.P.K. through Secretary Health Services, K.P.K. Peshawar.
- (2) Director General Health Services, K.P.K. Peshawar.
- (3) District Health Officer Haripur.
- (4) District Manager PPHI, DSU Haripur.

RESPONDENTS

Appeal U/S 4 of the K.P.K. Service Tribunals Act 1974, against the impugned Order dated 16/6/15, whereby departmental appeal of the appellant has been rejected which was against the Transfer Order No. 4234-4350/Estab/D/Cancellation, dated 30/04/2015, whereby the appellant has been transferred from BHU Tofkian to BHU Najjafpur, Haripur illegally and on basis of personal liking and disliking without considering the tenure of the service, which is not based on merits and being malafide is liable to be cancelled. Furthermore, during the pendency of department appeal preferred to Respondent No. 2/Director General Health Services K.P.K. Peshawar through Respondent No. 3/ District Health Officer Haripur the Respondent No. 3/District Health Officer Haripur issued an explanation letter No. 5408, dated 01-06-2015 to the appellant malafidely the copy of which was forwarded to the Accounts Section and consequently the salary of the appellant has been stopped till further order, hence the order is not maintainable being illegal, unlawful and unjust, hence the instant service appeal.

14/7/15

PRAYER:

On acceptance of the instant appeal, the impugned order of Respondent No. 2/D.G. Health Peshawar, dated 16-06-2015, whereby the departmental appeal of the appellant has been rejected as well as the transfer order No. 4234-4350/Estab/D/Cancellation, dated 30/04/2015, whereby the appellant has been transferred from BHU Tofkian to BHU Najjafpur, Haripur illegally and on basis of malafide intention, personal liking and disliking without considering the tenure may graciously be set aside and the appellant be allowed to perform her duty at BHU Tofkian Haripur and her salary may graciously be ordered to be released till the disposal of the main appeal.

Respectfully Sheweth:-

The facts giving rise to the instant appeal are as follows:-

- (1) That the appellant was appointed as F.M.T. on 24-12-1992 and posted at BHU Salam Khund, Ghazi. (Copy of appointment letter is annexed as "A").
- (2) That during the service period the appellant performed her duty to the entire satisfaction of her superiors at various far flung areas of Haripur District and she never disobeyed any order. (Copies of various orders are annexed as Annexure "B").
- (3) That the appellant vide order No. KPH/HR/M&E/2014/336, dated 24-07-2014 was transferred BHU Tofkian to Najjafpur and she resumed her duty accordingly. (Copy of the order is annexed as "C").
- (4) That the appellant vide order No. KPH/HR/M&E/2014/505, dated 27-10-2014 was again transferred from BHU Najjafpur to Tofkian in the public interest and she resumed her duty by obeying the order of her superior inspite of fact that service tenure was not considered. (Copy of the letter is annexed as "D").

- (5) That vide order No. 11048-52, dated 26-11-2014, on the basis of liking & disliking the appellant has been once again transferred from BHU Tofkian to BHU Najafpur. It is pertinent to mention here that the appellant was transferred thrice in one year i.e. 2014 which is against the prevailing policy and Service Rules. (Copy of order is annexed as "E").
- (6) That vide order No. 4234-4350/Estab/D/Cancellation: dated Haripur, the 30-04-2015. After a gap of only five months the appellant was transferred from BHU Tofkian to BHU Najafpur illegally without any justification without considering the mandatory tenure. (Copy of order is annexed as "F")
- (7) That the appellant preferred a departmental appeal for the redressal of her grievance on humanitarian grounds and as per prevailing law, but the Respondent No. 3 instead of giving proper relief issued her an Explanation with the fabricated, concocted and baseless allegations and her salary has also been stopped. (Copy of departmental appeal and a copy of the Explanation issued by Respondent No. 3 are annexed as "G & H").
- (8) That Respondent No. 02/D.G.Health Peshawar vide order dated 16-06-2015 rejected the departmental appeal of the appellant. (Copy of Order is annexed as "I").
- (9) That the appellant feeling herself aggrieved prefers the instant appeal before this Honourable Tribunal inter-alia on the following legal and factual grounds:-

GROUND OF APPEAL:

- (a) That it is crystal clear from the record that during the past tenure of service the appellant had been made a rolling stone by transferring her

from one station to another station without considering the prevailing policies and procedures merely on liking and disliking basis.

- (b) That the appellant did not complete the prescribed tenure at BHU Tofkian and within a short period i.e. in the same year she was again transferred BHU Najjafpur, which is illegal, unlawful and unjust against the policy of Service Rules.
- (c) That the appellant is facing pain in her back bone and is unable to move or travel to the hilly area to perform the duty. In this context MRI reports and diagnosis evidence are annexed as "J").
- (d) That the appellant has 03 innocent children and there is non to lookafter them because her husband is working H.I.T. Taxila. (Family Registration Form and School's receipts are annexed as "K").
- (e) That the appellant approached to the Civil Court for quick remedy but her plaint was returned having no jurisdiction to entertain the case and directed to consult the proper forum. (Copy of plaint is annexed as "L").
- (f) That the Respondent No. 3 issued an Explanation to the appellant and the allegation levelled against her in letter No. 5408.10 dated 01-06-15, is not justified because the Electric Water Motor in question was purchased by the appellant herself and in this respect she produced a proper receipt of its purchase, hence this allegation is merely self made, fabricated and concocted to put the appellant in agony on the part of Respondent No. 3 which is liable to be struck down on this score alone. (Copy of Receipt is annexed as Annexure "M").
- (g) That during the pendency of departmental appeal the Respondent No. 3 issued an Explanation to the appellant on baseless ground and he also forwarded the copy to the Accounts Section and stopped the salary of a poor and innocent appellant which is grave unjust, illegal and unlawful. It has been explained in preceding paragraph that the allegation levelled against the appellant is merely wrong & incorrect, hence the Explanation has become factitious and in these

circumstances the stoppage of salary is not justified and her salary is liable to be released to meet the expenses in this dearness.

- (h) That the Respondent No. 3 vide letter No. 5927-30/Estab/D/Discip" Action, dated 15-06-15, served a charge sheet and directed to appear before the Inquiry Committee. The appellant appeared before the Inquiry Committee and gave her written reply. (Copy written reply is annexed as Annexure "N"). Furthermore, the Respondent No. 3 falsely charged the appellant with regard to her house rent amounting to Rs. 194580/- vide Office Order No. 5679-82, dated 09-06-15 which is wrong, incorrect, arbitrary and perverse and liable to be set aside.
- (i) That the addresses of the parties as mentioned in the case titled are correct.

It is therefore respectfully prayed that on acceptance of the instant appeal, the impugned order of Respondent No. 3/D.H.O. Haripur dated 30-04-2015 and 01-06-2015 and order issued by Respondent No. 2/D.G. Health Peshawar dated 16-06-2015 may graciously be set-aside and the appellant be allowed to perform her duty at BHU Tofkian Haripur and the salary be please be ordered to be released till the disposal of appeal in hand she may please be exonerated from the false allegations levelled against her.

Dated: 8.7.15

Lubna Andleeb

Appellant
Lubna Andleeb

Through Counsel:

Shahida Javed
(SHAHIDA JAVED)
Advocate High Court
At Haripur.

VERIFICATION

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

Dated: 8.7.15

Lubna Andleeb

Appellant
Lubna Andleeb

Identified by:

Shahida Javed
(SHAHIDA JAVED)
Advocate High Court
At Haripur.

(8)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Mrs. Lubna Andleeb V/S Government of K.P.K. through
Secretary Health Services K.P.K. Peshawar
and others.

APPEAL U/S 4 OF THE K.P.K. SERVICE TRIBUNALS ACT 1974.

AFFIDAVIT

I, Lubna Andleeb D/O Masoof Ahmed, do hereby solemnly affirm and declare that the contents of accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Service Tribunal.

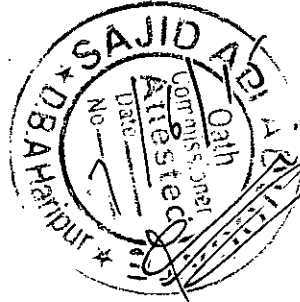
Dated: 8 / 7 / 2015.

Lubna Andleeb

Deponent
Lubna Andleeb

Identified by:

Shahida Javed
(SHAHIDA JAVED)
Advocate High Court
At Haripur.



(9)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Mrs. Lubna Andleeb **V/S** Government of K.P.K. through
Secretary Health Services K.P.K. Peshawar
and others.

APPEAL U/S 4 OF THE K.P.K. SERVICE TRIBUNALS ACT 1974.

CERTIFICATE

It is certified that that the appellant preferred the instant appeal before this Honourable Service Tribunal and no such like appeal has been preferred or filed in any Court or forum:

Dated: 8 / 7 / 2015.

Lubna Andleeb

Appellant
Lubna Andleeb

Through Counsel:

(SHAHIDA JAVED)
Advocate High Court
At Haripur.

Shahida Javed

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Mrs. Lubna Andleeb **V/S** Government of K.P.K. through
Secretary Health Services K.P.K. Peshawar
and others.

STAY APPLICATION

Application for the suspension of impugned Order No. 4234-4350/Estab/D/Cancellation, dated 30-04-2015 and grant of temporary injunction till the disposal of main appeal preferred in this Honourable Service Tribunal.

Respectfully Sheweth: -

The applicant states as under:-

- (1) That the applicant has filed the titled appeal before this Honourable Service Tribunal the contents of which may please be read as an integral part of this application.
- (2) That the applicant has hope for its success because the applicant has given credible facts and grounds in her main appeal.
- (3) That the Respondent No. 3 inspite of best performance of assigned duties, without any justification and without completion of prescribed tenure at BHU Tofkian Haripur issued transfer order malafidely, illegally and unlawfully, hence the applicant has a good prima facie case and balance of convenience also tilts in her favour and in case of non grant of stay against the impugned order, she will suffer irreparable loss.

It is therefore requested that in the interest of justice the impugned Order issued by Respondent No. 3 cited above may please be suspended and the applicant may graciously be allowed to perform her duties at BHU Tofkian till the disposal of main appeal.

Dated: 8 / 7 / 2015.

Lubna Andleeb
Applicant
Lubna Andleeb

Through Counsel:

(SHAHIDA JAVED)
Advocate High Court
At Haripur.

VERIFICATION

Verified on oath that the contents of this Stay application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Service Tribunal.

Dated: 8 / 7 / 2015.

Lubna Andleeb
Applicant
Lubna Andleeb

(11)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Mrs. Lubna Andleeb. **V/S** Government of K.P.K. through
Secretary Health Services K.P.K. Peshawar
and others.

**APPLICATION FOR THE ISSUANCE OF TEMPORARY
INJUNCTION TILL THE DISPOSAL OF MAIN APPEAL.**

AFFIDAVIT

I, Lubna Andleeb D/O Masood Ahmed, do hereby solemnly affirm and declare that the contents of accompanying application for the suspension of impugned order passed by Respondent No. 3 are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable service Tribunal.

Dated: 8 / 7 / 2015.

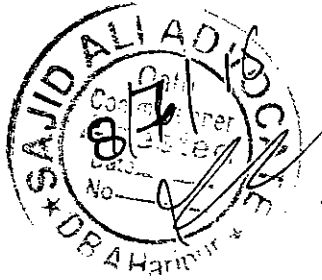
Lubna Andleeb

Deponent
Lubna Andleeb

Identified by:

Shahida Javed

(Shahida Javed)
Advocate High Court
At Haripur.



BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Mrs. Lubna Andleeb **V/S** Government of K.P.K. through
Secretary Health Services K.P.K. Peshawar
and others.

Application for the grant of an Interim Relief by issuing the directions to Respondent No. 3 to release the salary of the applicant till the decision of main appeal preferred in this Honourable Service Tribunal.

Respectfully Sheweth: -

The applicant states as under:-

- (1) That the applicant has filed the titled appeal before this Honourable Service Tribunal the contents of which may please be read as an integral part of this application.
- (2) That the applicant has hope for its success because the applicant has given credible facts and grounds in her main appeal.
- (3) That the Respondent inspite of best performance of assigned duties of the applicant issued her an Explanation with the concocted and fabricated allegation as a result thereof the Accounts Section has stopped the salary of the applicant upon the direction of Respondent No. 3, illegally and unlawfully.
- (4) That the applicant has innocent 03 children and she will face great financial difficulties specially in the holy month of Ramzan, if her salary is not ordered to be released.

It is therefore requested that in the interest of justice directions may graciously be passed to the Respondent No. 3 to release the salary of the applicant till the disposal of main appeal.

Dated: 8 / 7 / 2015.

Lubna Andleeb
Applicant
Lubna Andleeb

Through Counsel:

(SHAHIDA JAVED)
Advocate High Court
At Haripur.

VERIFICATION

Verified on oath that the contents of instant application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Service Tribunal.

Dated: 8 / 7 / 2015.

Lubna Andleeb
Applicant
Lubna Andleeb

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Mrs. Lubna Andleeb V/S Government of K.P.K. through
Secretary Health Services K.P.K. Peshawar
and others.

APPLICATION FOR THE ISSUANCE OF DIRECTIONS TO THE
RESPONDENT NO. 3 TO RELEASE THE SALARY OF THE
APPLICANT TILL THE DISPOSAL OF MAIN APPEAL.

AFFIDAVIT

I, Lubna Andleeb D/O Masood Ahmed, do hereby solemnly affirm and
declare that the contents of accompanying application are true and correct to the
best of my knowledge and belief and nothing has been concealed from this
Honourable service Tribunal.

Dated: 8 / 7 / 2015.

Lubna Andleeb

Deponent
Lubna Andleeb

Identified by:

(Shahida Javed)
Advocate High Court
At Haripur.

Shahida Javed



(14)

ANNEX - A

DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

OFFICE ORDER.

The Services of 23 TMT who have passed the (BH) Examination from the NWFP, Medical Faculty Peshawar held in June, 1992 are hereby placed at your disposal for appointment in various BHUs/RHCs under your control, under intimation to this Directorate:-

1. Miss:Rukhsana Khan D/O Kala Khan.
2. Miss:Sadia Zia D/O Aftab Zia.
3. Miss:Shahida Perveen D/O Rehmat Shah.
4. Miss:Fakhira Gul D/O Mohammad Sirajul Haq.
5. Miss:Rukhsana Bibi D/O Mirza Mohammad Hussan.
6. Miss:Surriya Bibi D/O Mohammad Aslam.
7. Miss:Shahana Shaheen D/O Mohammad Yacub.
8. Miss:Bibi Gulnaz D/O Taqir Mohammad.
9. Miss:Farzana Bibi D/O Mirza Muhammad Hussan.
10. Miss:Badar Akhtar D/O Juma Khan.
11. Miss:Mehmuna Sarwar D/O Mohammad Sarwar Din.
12. Miss:Saeeda Akhtar D/O Wali Mohammad.
13. Miss:Rukhsana Jabeen D/O Ali Asghar.
14. Miss:Shazia Shaheen D/O Asrorul Haq.
15. Miss:Uzana Andleeb D/O Masood Ahmad.
16. Miss:Kousar Shaheen D/O Sadia Shad.
17. Miss:Busra Kosar D/O Zaman Hader.
18. Miss:Asia Jabeen D/O Khani Zaman.
19. Miss:Penzi Nawaz D/O Haq Nawaz.
20. Miss:Farida Gul D/O Ghulam Mohammad.
21. Miss:Mehrun Nisa D/O Aurang Zeb.
22. Miss:Saeeda Bibi D/O Mohammad Amir.
23. Miss:Abida Kanwal D/O Sher Bahadar.
24. Miss:Atiya Kausar D/O Younus Awan.
25. Miss:Rahat Afshan D/O Khalil ur Rehman.
26. Miss:Nasreen Sultan D/O Sultan Mohammad.
27. Miss:Irshad Bibi D/O Ali Bahadar.
28. Miss:Riffat Naeed D/O Sikandar Khan.

NB:- Arrival and Departure report should please be intimated to this Directorate.

3D/-

Dr.Nader Khan
Director General Health,
Services, NWFP, Peshawar.

No. 143-71 /E.III, Dated Pesh: the 04/12/1992.
Copy forwarded to the:-

1. Miss:Rukhsana Khan d/o Kala Khan Vill:Bailla Gondian Abbottabad
2. Miss:Sadia Zia d/o Aftab Zia House No.165 supply Bazar Abbottabad.
3. Miss:Shahida Perveen d/o Rehmat Shah Gherwal Vill:Daryal Mansehra.
4. Miss:Fakhira Gul d/o Mohammad Sirajul Haq Vill:Hussan Abad Dalako Mansehra.
5. Miss:Rukhsana Bibi d/o Mirza Mohammad Hussan House No.204/21 K:L Khala Khal Abbottabad.
6. Miss:Surriya Bibi d/o Mohammad Aslam Moh:Mohammad Zia To 30-31 Nawan Shehr Abbottabad.
7. Miss:Shahana Shaheen d/o Mohammad Yacub C/O Iqbal Karyana Store Shimla Hill Upper Malik Pura Abbottabad.
8. Miss:Bibi Gulnaz d/o Taqir Mohammad Vill:Bher Kund(Awan Abad Teh & Distt:Mansehra.

Handwritten signature/initials

9. Miss:Farzana Bibi d/o Mirza Muhammad Ussan House No.204/21 Khala Khal Abbottabad.
10. Miss:Badar Akhtar d/o Juma Khan Vill:Khalabat Town Ship Sector No.3 House No.201 Haripur.
11. Miss:Mehmoona Sarwar d/o Mohamad Sarwar Din Moh:Mohammad Zai House No.209 Nawan Shehr Abbottabad.
12. Miss:Saeeda Akhtar d/o Wali Mohammad Allama Iqbal Colony Murri Road Nawan Shehr Abbottabad.
13. Miss:Rukhsa Jabeen d/o Ali Asghar Ali General Store Near Ghala Ghodom Abbottabad Mansehra.
14. Miss:Shazia Shaheen d/o Asrorul Haq Moh:Khala Kohal House No.302/A Khala Khal Abbottabad.
15. Miss:Lubana Andleeb d/o Masood Ahmad Moh:Piran Wala New Khanpur Haripur.
16. Miss:Kousar Shaheen d/o Sadia Shad Al Shaheen Public School Abbottabad Road Mansehra.
17. Miss:Bushra Kosar d/o Zamaq Hader Vill:Ghar Khan Teh & Distt:Haripur.
18. Miss:Asia Jabeen d/o Khani Zaman Vill:Datta Distt: Mansehra.
19. Miss:Penzi Nawaz d/o Haq Nawaz Moh:Loharan Chowk Polic Haripur.
20. Miss:Farida Gul d/o Ghulam Mohammad Sahdat Husan House No.814/C Sharanwalla Gate, Haripur.
21. Miss:Meerun Nisa d/o Aurang Zeb Namli Mira Abbottabad.
22. Miss:Saeeda Bibi d/o Mohammad Amir Tehsil & Distt: Abbottabad.
23. Miss:Abida Kanwal d/o Sher Bahader Khalabat Town Ship Sector 4 Darband Haripur (Hazara).
24. Miss:Atiya Kausar d/o Younus Awan Ahrar Ahmad Vill & P.O. Beer Teh & Distt:Abbottabad Via:Haripur Hazara.
25. Miss:Rahat Afshan d/o Khalil ur Rehman C/O Khalilur Rehman Vill: Tanda Mansehra.
26. Miss:Nasreen Sultan d/o Sultan Mohammad Vill:Phuryari Haripur Distt:Abbottabad.
27. Miss:Irshad Bibi d/o Ali Bahader Moh:Jabri Near G.P.O Mansehra.
28. Miss:Riffat Nabeed d/o Sikandar Khan Malik Tai Mohammad XEN Wanda Bangla No. C 4 Main Colony Tarbela Dam.

For Director General Health,
Services, NWFP, Peshawar.

NO. 172 /E.III, 04/01/93.

Copy forwarded to the Divl: Director Health Services, Hazara at Abbottabad for information n/action.

For Director General Health,
Services, NWFP, Peshawar.

M. Tariq.
23.12.92.

(15)

ANNEX - B

OFFICE OF THE DISTRICT HEALTH OFFICER ABBOTTABAD.

OFFICE ORDER.

The following adjustment/posting of FMTs is hereby made with immediate effect in the public interest:-

S.No.	Name	Designation	From	To	Remarks
1.	Tubna Audloo	FMT	BHU Nullah	BHU Bheray	Vice No. below.
2.	Nasreen Sultan	FMT	Under transfer by BHU Mansakrai to BHU Satora.	BHU Nullah.	Vice No. above.
3.	Qudata Noorah	FMT	BHU Bheray on G. duty DHO Mangshra.	BHU Satora on G. duty DHO Mangshra.	

Arrival/Departure report should be sent in due course of time.

22/-

DISTRICT HEALTH OFFICER
ABBOTTABAD

NO. 11243-98 IPF Dated Abbottabad the,

16/9/1997.

Copy forwarded to the :-

1. DHO Mangshra.
2. Medical Officer BHU I/C Nullah.
3. Medical Officer I/C BHU Mansakrai.
4. Medical Technician I/C BHU Bheray.
5. Medical Technician I/C BHU Satora.
6. Account Section DHO's office Abbottabad.

for information and n/action.

DISTRICT HEALTH OFFICER
ABBOTTABAD

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OFFICE ORDER

The following posting transfer of under mentioned Female Medical Technicians is hereby ordered with immediately effect in public interest.

S #	Name & Designation	From	To	Remarks
1	Lubna Andleeb FMT	Type-D Hospital Khanpur	BHU Tolkian	Vice No. 2 below
2	Rahat Aziz FMT	BHU Tolkian	Type-D Hospital Khanpur	Vice No. 1 above

Departure Arrival reports should be submitted of this office in due course of time.

Sd/-
Executive District Officer
(Health) Haripur

No. 8508-13/PF /Estt:

Dated Haripur, the

13/12/2011

Copy forwarded to:

1. Raja Faisal Zaman Khan MPA for information please.
2. Senior Medical Officer Type-D Hospital Khanpur
3. District Support Manager PPHI Haripur
4. I/C BHU Tolkian
5. Accounts Section undersigned office.
6. Official concerned.
For information.

Executive District Officer
(Health) Haripur



ANNEX - C

(17)



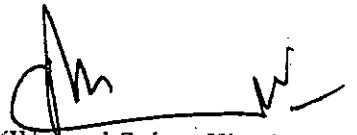
The District Support Unit Haripur
Khyber Pakhtunkhwa Primary Healthcare

(1)

Office Order:

Order No. KPH/HR/M&F/2014/-336, Ms. Lubna Andleeb, FMT, working in BHU Tofkian is hereby transferred to BHU Najaspur with immediate effect in the best public interest against the available vacant position.

She is directed to submit her arrival at this office within three days of the receipt of the order.


(Waheed Sultan Khan)
District Manager,
KPH, DSU, Haripur.

Dated: 24-07-2014.

C. c:

1. Concerned In-charges.
2. Concerned official.
3. Office copy.



The District Support Unit Haripur
Khyber Pakhtunkhwa Primary Healthcare

(2)

Office Order:

Order No. KPH/HR/M&E/2014/504, the following transfers / postings of staff is hereby made with immediate effect in the best public interest to the stations mentioned against each.

S. No	Name	Designation	Current place of posting	Transferred to
01	Ms. Lubna Andleeb	Female Medical Technician	BHU Najafpur	BHU Tofkian
02	Ms. Nighat Sohail	Female Medical Technician	BHU Tofkian	BHU Najafpur

Both the officials are directed to submit their arrival and departure reports to this office within three days of the receipt of this order along with proper charge reports.

(Wahed Sultan Khan)
District Manager,
KPH, DSU, Haripur.

Dated: 27-10-2014.

C. c:

1. Concerned In-charges.
2. Concerned official.
3. Office copy.



ANNEX - E

OFFICE OF THE DISTRICT HEALTH OFFICER HARIPUR.

19
19
2

OFFICE ORDER:

The following postings / transfers of under mentioned Junior PHC Technicians (MP) / Female Medical Technician is hereby ordered with immediate effect in the best of public interest:-

S#	Name	From	To	Remarks
1	Ms., Lubna Andiceb	Basic Health Unit Tolkian	BHU Najaspur	Vice No.02 below
2	Mst. Nighat Rasheed	BHU Najalpur	Basic Health Unit Tolkian	Vice No.01 above

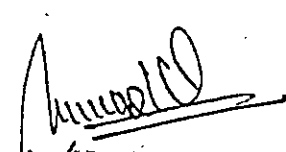
Note: Departure/arrival reports must reach within stipulated period.

Sd/....
District Health Officer
Haripur.

No. 11048-52 /Estab/D/Posting/transf. Dated Haripur, the 26 /11/2014.

Copy forwarded to the: -

1. District Manager, KPH, DSU, Haripur.
 2. Incharge, Basic Health Unit, Najaspur.
 3. Incharge, Basic Health Unit Tolkian.
 4. Account Section undersigned office.
 5. Officials concerned.
- Fr information and necessary action.


District Health Officer
Haripur.





OFFICE ORDER:

**OFFICE OF THE DISTRICT HEALTH OFFICER
HARIPUR.**

Consequent upon the Director General Health Services Khyber Pakhtunkhwa Peshawar office order bearing endorsement No.4698-766/Personnel dated 20.04.2015, the following staff posted on General Duty / Detailment in various Health Facilities in the District are hereby repatriated to their original place of posting with immediate effect.

S#	Name	Designation	BS	Working on G.D/Detailment	Original Place of posting
1	Dr. Muhammad Muddasar Iqbal Khan	Medical Officer	17	DHQ (II) Haripur	Type D Hosp: S.N.Khan
2	Dr. Tanraiz Khan	Medical Officer	17	Type D Hospital Khanpur	BIU Dingi
3	Dr. Shafia Sheikh	Dental Surgeon	17	CH Rehana	RHC Nara Amazai
4	Dr. Hassan Shah	Medical Officer	17	DHQ(H) Haripur	CH KTS
5	Dr. Roheena	W. Medical Officer	17	DHQ(H) Haripur	TDH S.N.Khan
6	Muhammad Rafaqat	Chief PHC Tech: (MP)	16	SHC Bandi Barcela	RHC Kot Najibullah
7	Hasina Bibi	Sr:PHC Tech: (MCH)	14	TDH Khanpur	RHC Halli
8	Rukhsana Sadiq	-do-	14	CH KTS	BHU B.S.Khan
9	Yasmin Akhtar	-do-	14	TBC Haripur	TDH S.N.Khan
10	Shahnaz Begum	Jr:PHC Tech:(MCH)	09	RHC Kot Najibullah	Report to DM KPH,DSU Haripur
11	Shahida Rasheed	Jr:PHC Tech:(MCH)	09	-do-	-do-
12	Miaz Muhammad	Jr:PHC Tech:(MP)	09	-do-	-do-
13	Sarwat Khan	Jr:PHC Tech:(M:P)	09	NCD Pharhalla	-do-
14	Amjad Nazam	Jr:PHC Tech:(M:P)	09	CD KTS No:4	-do-
15	Samar Iqbal	Chowkidar	01	TBC Haripur	-do-
16	Shahida Bibi	Dai	02	TBC Haripur	-do-
17	Rukhsana Begum	Dai	02	SHC Qazipur	-do-
18	Muhammad Sultana	Dai	02	MCH KTS	-do-
19	Shahiyaz	Jr:PHC Tech: (M:P)	09	SHC Qazipur	-do-
20	Muhammad Hassab	Sweeper	01	DHO Office Haripur	-do-
21	Abdul Khaliq	W/Ordely	02	-do-	-do-
23	Waqas A. Qazi	Behishti	0	-do-	-do-
24	Taza Khar	Jr:PHC Tech:(MP)/MT	09	RHC Kalingar	-do-
25	Fahzeena Akhtar	Jr: PHC Tech:(MCH)/LHV	09	RHC Halli	-do-
26	Adnan	Chowkidar	01	DHO Office	-do-
27	Amna Bibi	Jr:PHC Tech (MP)	09	RHC Halli	-do-

Amna Bibi

21

	Jamila Khatoon	Dai	02	RHC Kotnajibullah	-do-
29	Parveen Akhtar	Dai	02	DHQ Hosp:Haripur	-do-
30	Rukhsana Bibi	B/S	01	RHC Sirikot	-do-
31	Baidar Akhtar	Jr.PHC Tech;(MP)/FMT	09	CH KTS	-do-
32	Azra Bibi	Jr.PHC Tech;(MCH)/LHV	09	CH Rehana	-do-
33	Raja Maqbooi Raza	W/O	02	RHC Kalanjar	-do-
34	Samia Bibi	Jr.PHC Tech;(MP)/FMT	09	Type-D Hospital, Khanpur	-do- after Iddat Leave
35	Asim Shezad	-do-	09	CH KTS	TDH Khanpur
36	Malik Muhammad Zubair	Driver	04	RHC Kot Najibullah	RHC Halli
37	Abbas Khan	N/Qasid	01	Type-D Hospital Khanpur	Type-D Hosp: Ghazi
38	Mohammad Ashraf	Lab:Attendant	01	DHQ Hospital Haripur	RHC Kot Najibullah
39	Shah Nawaz	-do-	01	CH KTS	RHC Kalanjar
40	Muhammad Khurshid	X-Ray Att:	01	DHQ Hospital Haripur	RHC Kalanjar
41	Muhammad Naeem	D/Attendant	02	-do-	RHC Kalanjar
42	Shakeel Ahmed	Sweeper	02	TBC Haripur	CH Kotla
43	Chan Bibi	Ward Aya	02	TBC Haripur	CH KTS
44	Sarfraz	N/Q	02	TBC Haripur	DHO Office
45	Saeeda Bibi	Jr:PHC Tech:(MCH)	09	CH KTS	TBC Haripur
46	Farkhanda Bibi	Dai	02	DHQ Hosp:Haripur	CD K.N.Bullah
47	Tasleem Bibi	Dai	02	DHQ Hosp:Haripur	CD Pharrari
48	Nabeela Khatoon	Dai	02	MCH KTS	CD KTS-3
49	Muhammad Shakoore	Behishti	02	RHC Sirikot	DHO office
50	Nabeed Akhtar	Dai	02	N.Programme	CH KTS
51	Muhammad Fazal	S/Petro	02	-do-	DHO office
52	Muhammad Azam Khan	Chowkidar	02	CD KTS No-3	RHC Halli
53	Rukhsana Bibi	JCT (Dental)	09	Central Jail H/P	TDS Ghazi
54	Muhammad Irfan	JCT (Pharmacy)	09	BHU Bandi Sher Khan	CD KTS No-04
55	Abdur Rasheed	Chowkidar	02	BHU Gudwalian	TDH Ghazi
56	Nawaz Akhtar	Sweeper	01	RHC Halli	TDH SN Khan
57	Hamid Farooq	JCT (Surgical)	09	DHQ Hospital	TDH Ghazi
58	Qamat Ayyaz	Store Keeper	06	CD KTS No-4	TDH Ghazi
59	Jawad Ahmed	W/O	02	BHU M.Abac	TDH Ghazi
60	Aneela Gul	Dai	02	CH KTS	MCH KTS-3
61	Nabila Khatoon	Dai	02	MCH KTS-No-3	CD KTS No-3
62	Asim Khan	JCT Dental	09	DHQ Hospital	RHC Kalanjir
63	Muhammad Naeem	Behishti	01	BHU Ghumawan	CH Kotla
64	Akram Khan	Mali	01	CH KTS	RHC Nara Amazai
65	Riaz Khan	Chowkidar	01	CH KTS	TDH Khanpur
66	Malik Yaqoob	JCT (Pharmacy)	09	NCD Chooi	TDH Khanpur

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67	Abdul Shakoor	D/Attendant	02	DHQ Hospital	RHC Halli
68	Muhammad Ehsan	JCT (Pharmacy)	09	NCD Nara Mumaia	CH KTS
69	Muhammad Rafiq	Driver	04	RHC Halli	TDH Khanpur,
70	Maryum Bibi	Jr;PHC Tech: (MCH) / LHV	09	CD KTS No3 KTS	BHU Dudwalan Case under trail in S.Tribunal
71	Muhammad Nacem	N/Qasid	02	DHO Office	RHC N.Amazai
72	Naseer Ahmed	Clinical Tech: (Pharmacy)	14	CD Kholian Bala	CH Rehana
73	Tofees Anjum	Charge Nurse	16	DHQ Hospital	RHC Sirikot
74	Asghar Khan	JCT (Radiology)	09	DHQ(H) Haripur	RHC Kalanjir
75	Shahid	Driver	04	Drug Control Office	RHC Nara Amazai
76	Muhammad Hafeez	S/Petrol	02	-do-	DHO office
77	Qaisar	Driver		National Programme	RHC Kot Najibullah
78	Qamar Javed	Sanitary Petrol	01	DHQ Hospital	RHC Kalangir
79	Muhammad Nacem	Behishti	01	BHU Ghumawan	CH Kotla
80	Zafrullah	Mali	01	DHQ Hospital	RHC Kalanjir
81	Muhammad Zarin	Mali	01	DHO Office	TDH Ghazi
82	Mirza Murad	Mali	01	-do-	RHC Kalangir
83	Muhammad Younis	Behishti	02	-do-	CH KTS
84	Nacem Khan	N/Q	02	-do-	RHC Nara Amazai
85	Mohammad Yasin	W/O	02	-do-	TDH Khanpur
86	Shezad	Electrician	06	-do-	TDH SN Khan
87	Majid Khan	Store keeper	06	-do-	TDH Khanpur
88	Abdul Wahid	JCT(Pharmacy)	09	-do-	RHC Kot Najibullah
89	Riffat Bibi	PHC Tech;(MCH)/LHV	12	Type-D Hospital, SNK	BHU Bandi Sher Khan
90	Niaz Parveen	Jr.PHC Tech;(MP)/FMT	09	CD KTS-3	RHC Kotnajibullah
91	Ayaz Shah	Mali	01	CD KTS-3	RHC Halli
92	Muhammad Ayaz	N/Q	01	DHO Office	TBC Haripur
93	Tufail Khan	Ward Orderly	02	DHO Office	Type-D Hosp;SNK.To work at DHO Office at Store
94	Ijaz	Sweeper	01	DHO Office	Type-D Khanpur
95	Muhammad Junaid	Driver	04	DHQ(H)Haripur	Type-D S.N.K
96	Muhammad Hameed	JCT Pharmacy	09	BHU Kaneeri	DHQ(H) Haripur
97	Majid	Junior Storekeeper	06	DHO Office	Type-D Hosp;Khanpur
98	Maryam Sultan	Dai	02	CD Kotnajibullah	RHC Kotnajibullah
99	Yasmeen Bibi	J.PHC Tech(MCH)	09	RHC Sirikot	Report to PHC
100	Raja Muslim Javed	Ward Orderly	09	T.D S.N.Khan	RHC Kotnajibulla
101	Nawaz Akhtar	Sweeper	01	RHC Halli	T.D. S.N.Khan
102	Muhammad Rafique	JCT Pharmacy	09	RHC Halli	CD Kholian Bala
103	Ghulam Fareed	JCT Pharmacy	09	NCD N.Bhutto	CH Kotla

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	Attiqur Rehman	Ward Orderly	02	CH KTS	BHU Dheedat
	Mahroof Khan	Sweeper	01	RHC Kalinjar	CD KTS-4
106	Tayyab Khalid	Behishti	01	RHC Kalinjar	CD KTS-3
107	Lubna Andleeb	J.PHC	09	BHU Tokian	BHU Najalpur
108	Parveen Akhtar	Tech(MP)FMT			
109	Niaz Mohammad	Dai	02	DHQ(H) Haripur	BHU Dheedat
		JCT Radiology	09	DHO Office (working as S/K	TDH S.N.Khar. To work as S/K, as there is no sanctioned post at DHO office

Note:- Departure / Arrival reports should be submitted to this office within (07) days from the issuance of this office order, otherwise salary will be stopped and disciplinary action against the officers / officials who will not obeying the orders.

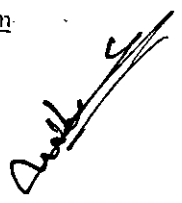
Sd/-
District Health Officer,
Haripur.

No. 4234-4350 /Estab/D/Cancellation: Dated Haripur, the 30/04/2015.
Copy of the above is forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar w/ to above please. It is further certified that no officer / official working on General Duty / detainment.
2. PA to Secretary Health KPK Peshawar.
3. Deputy Commissioner Haripur.
4. Medical Superintendent DHQ Hospital, Haripur.
5. Superintendent Central Prison Haripur.
6. District Support Manager, DSU (PPH) Haripur.
7. Coordinator DEHS Cell undersigned office.
8. All Incharges of above named Health Institutions.
9. All above named officers / officials for compliance and report.
10. Accounts Section (Local) for in/action.


District Health Officer,
Haripur.

District Health Officer, Haripur
Phone & Fax # 0995-610997
dhoharipur@yahoo.com



D.No. 1240
Date: 13-5-15

ہرہ ہرا ہر چینک

ڈائریکٹرز جنرل ہیلتھ سروسز K.P.K پشاور

بذریعہ
جناب ڈسٹرکٹ ہیلتھ آفیسر صاحب تحصیل و ضلع ہری پور

اپیل بر خلاف آرڈر نمبری 4234-4350/ESTAB/O/cancelled

مورخہ 30-04 2015 و ضمنی آرڈر مندرجہ عنوان مورخہ 30-04 2015

جناب عالی

موجبات اپیل درج ذیل ہے

1. یہ کہ ایپلانٹ کی تفصیلات آئیے حکم میں 24 دسمبر 1998 کو FMT پوسٹ پر عیقا غازی سلم کھنڈ BHU بیرونی. بعد از اس ایپلانٹ مختلف دور دراز کے سیشن پر اپنے فرائض منصبی بخوبی سرانجام دیتی رہی. امداس دوران من ایپلانٹ کی ٹرانسفرز حسب ضابطہ Tenure کی بنیاد پر بیرونی ہی تھیں.

2. یہ کہ ایپلانٹ کی خدمات سے حکمہ یا عام لوگوں کو بھی کوئی شکایت نہ بیرونی.

3. یہ کہ بدوران فرائض منصبی ایپلانٹ 2013 میں نگر درد کا مرض میں مبتلا بیرونی. جبکہ وجہ سے بڑی علاقوں پر جائز فرائض منصبی ادا کرنا دشوار ہو گیا. نیکت پر بھی جانفشانی سے اپنی ذمہ داری سرانجام دیتی رہی. یہ کہ نگر درد کی شدت میں بتدریج اضافہ ہوتا چلا گیا جبکہ وجہ سے ڈاکٹر علی عباس کے زیر علاج رہی.

اس دوران مورخہ 14-9-10 کو ایپلانٹ کو ڈاکٹر فائزہ الہری نے MRI تجویز کی - MRI کی رپورٹ لف اپیل ہے ہذا ہے جو کہ ہمدانہ طور پر قابل ملاحظہ کی جاوے.

4. یہ کہ 2014 میں ایپلانٹ کی ٹرانسفر 3 چار مرتبہ

علی علی

بحف پورہ اور توفلیا کے درمیان سیویں 24-7 کو توفلیاں
 BHU سے بحف پورہ BHU بھیجا گیا۔ پھر 27-10 2014 کو بحف پورہ
 سے توفلیاں BHU ٹرانسفر کیا گیا۔ جو کہ پرمٹ آڈر تھا۔
 پھر ایک ماہ بعد 11-26 کو توفلیاں سے بحف پورہ بھیجا۔
 اسی دن اپیل نمٹ کر حکم حاکم ²⁰¹⁴ بیماری کی حالت میں ہی بحالاتی
 رہی۔ 02-01 کو بحف پورہ سے توفلیاں بھیجا گیا۔ ²⁰¹⁵ مدعیہ/اپیلانٹ
 نے پھر بھی حکم کی بحال آوری کی۔ مگر اب حالیہ آڈر متدعویہ
 30-4-15 4234-4350/ESTAB/D/cancellation
 کی رو سے من اپیلانٹ کی ٹرانسفر سیریل نمبر 107 کے
 مطابقت توفلیاں سے بحف پورہ کر دی گئی ہے۔ جو کہ سراسر
 نا انصافی، سروس رولز کی خلاف ورزی اور خلاف قانون
 ہے۔ کیونکہ من اپیلانٹ ایک منتقل employee ہے۔
 جو کہ 1992 سے اپنی ڈیوٹی منتقل سرانجام دے رہی ہے۔
 جبکہ متدعویہ آڈر جنرل ہے۔

5. یہ کہ 2014 - 2015 سے ٹرانسفر مذکورہ جو بھی باہر کی جاری
 ہے۔ جو کہ انسانی حقوق کی خلاف ورزی کے ساتھ ساتھ
 سروس رولز کی بھی خلاف ورزی ہے۔ جب میں Tenure سپرینٹ
 کو متد نظر نہ دیا گیا ہے۔ اور اپیلانٹ کی ٹرانسفر کو ذاتی پسند
 امناپسند کی بنیاد پر کیا جاتا رہا ہے۔ جبکہ ٹرانسفر ذاتی
 عیار و پسند و ناپسند کی بنیاد پر نہیں ہونے چاہیے Public interest
 کی جاتی ہیں۔ لیکن مذکورہ متدعویہ آڈر ذاتی پسند و ناپسند
 پر کیا گیا۔ جو کہ بالکل خلاف قانون خلاف واقعات
 اور قابل منسوخ ہے۔



یہ کہ اپیلانٹ کے بچے نابالغان ہیں جنکی عمر یہاں بالترتیب
 12 سال، 10 سال، 7 سال ہیں۔ (نقل بافارہ لٹریچر)
 جو کہ HIT کینٹ ٹیکسٹ میں زیر تعلیم ہیں۔ میرے سٹیویر شفٹ
 محمود بھی HIT ٹیکسٹ کینٹ میں ملازمت کرتے ہیں۔ میں
 نوکری اپنے گھری کفالت کرنے کیلئے کرتی ہوں۔ نجف پور BHU
 چلے جانے سے میری بیماری میں بھی اضافہ ہوگا اور میرے گھر کا
 نظام بھی درہم برہم ہو جائے گا۔

استدعا ہے کہ میری اپیل کو منظور فرماتے ہوئے میرے
 خلاف جاری کردہ آرڈر 4234-4350/ESTAB/D/Cancellation
 صدر نے 30-11-2015 کینسل فرمایا جاوے اور مجھے توفیلیاں
 میں یہی ڈیوٹی جاری رکھنے کی نیت مناسب احکامات
 صادر فرمائے جاوے۔ اپیلے یذا کا ضمیمہ
 Hummantarian Ground

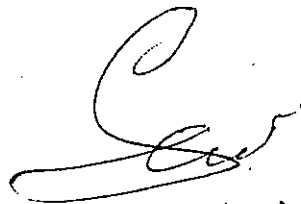
پر صادر فرمایا جاوے۔

شکریہ

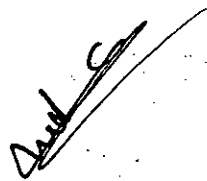
13-5-2015

لبنی عدلیب FMT پوسٹ توفیلیاں BHU
 محمد فضل میری پور Bandrab

Received



13/5/15



ANNEX - H

27



OFFICE OF THE DISTRICT HEALTH OFFICER

HARIPUR.

No. 5408/10
Dated Haripur, the

Estab/D/Expl.
01/06/2015.

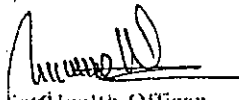
To:

Mrs. Lubna Andleeb,
Junior PIC Technician (MP)/FMT
BIU Tokian / Original place of posting
at BIU Najalpur.

Subject: Explanation.
Memo:

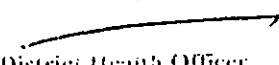
The District Manager, PPH, DSU, Haripur has reported through his letter No.278 dated 20.05.2015, that Electric Water Motor along-with Accessories (Electric Wire, Rope and Water Pipe etc) of the BIU Tokian were in personal possession in your residential quarter and the same recovery of Water Pipe and Rope from you, which shows great negligence on your part.

Therefore, you are directed to explain your position in writing within three days of the receipt of this letter, otherwise strict disciplinary action shall be taken against you.


District Health Officer,
Haripur

No. A/Estab/D/Expl:

- Copy forwarded to the: -
1. District Manager, PPH, DSU, Haripur w.r to above for information please.
 2. Account Section undersigned office with the direction to stop the pay of above named official with immediate effect till further order.


District Health Officer,
Haripur.

dhoharipur@yahoo.com

Recd on 4/15/15 by
Dr. Ashfaq





MRI MRDEA- ERRA- AMI ABBOTTABAD

Name: Lubna Andaleeb Age: 39 years SEX: F ID: 1409057

Reporting date: 10-09-2014

Referring doctor: DHQ Hospital Haripur

Clinical Information: Left Sciatica.

STUDY: MRI LUMBAR SPINE WITHOUT CONTRAST.

FINDINGS:

There is mild straightening of the lumbar spine, suggesting muscle spasm. There is loss of normal high disc signal throughout the lumbar spine. Early osteophytes formation noted at multiple levels with reduce disc height of L5. Conus medullaris ends at its normal level. Bone marrow signals are normal. The paravertebral soft tissues are normal.

L1-L2: There is no significant disc bulge. The spinal canal and neural foramina are patent.

L2-L3: There is mild disc bulge. The spinal canal and neural foramina are patent.

L3-L4: There is mild diffuse disc bulge with bilateral facet joints hypertrophy. Bilateral lateral recess and neural foraminal narrowing with compression on exiting nerve roots.

L4-L5: There is central disc extrusion causing severe spinal canal stenosis. Bilateral lateral recess and neural foraminal narrowing with compression on exiting nerve roots.

L5-S1: There is central and left paracentral disc protrusion causing thecal sac compression. Bilateral lateral recess and neural foraminal narrowing with compression on exiting nerve roots more marked on left side.

IMPRESSION:

Disc degenerative disease with early changes of lumbar spondylosis

At L5-S1, central and left paracentral disc protrusion causing thecal sac compression. Bilateral lateral recess and neural foraminal narrowing with compression on exiting nerve roots more marked on left side.

Please also see above detail report.

Prof. Dr. M. Jehanzeb
MBBS, DMRD, MCPS, FCPS,
HOD Radiology ATH.

Dr. Khalid Khan
MBBS, DMRD,
Associate Prof.

Dr. Ghayyur Khan,
MBBS, DMRD,
Associate Prof.

Dr. Faiza Akram,
MBBS, MCPS, FCPS,
Asstt. Prof.

Dr. Azmat Ali,
MBBS, FCPS,
Radiologist ATH



AARDIC

No. 000081

MEDICAL HISTORY / TREATMENT BOOK

HIT HOSPITAL TAXILA CANTT

OPD No. _____ FACTORY No. TF-16196 ⁵¹¹

NAME Shafqat Mahmood SIO Mehmood Khan

SEX Male ^{DOB} AGE 12-2-1978 PROJECT AARDIC

DATE OF ENROLMENT 27-12-2006 DATE OF ISSUE 03-08-2011

PARTICULARS OF DEPENDENTS

Sr No.	NAME	SEX	AGE	RELATIONSHIP WITH EMPLOYEE	PAGE No.
1	Mehmood Khan	M	5 ² / ₁₉₄₆	Father	
2	Taj Sultan	F	4 ² / ₁₉₆₀	Mother	
3	Lubna Shafqat	F	4 ¹¹ / ₁₉₇₇	Wife	
4	Nirna Shafqat	F	12 ² / ₂₀₀₁	Daughter	
5	Hamad Shafqat	M	12 ² / ₂₀₀₃	Son	
6	Obaid Shafqat	M	8 ⁰¹ / ₂₀₀₇	Son	
7					
8					
9					
10					

انتباہ:- جو شخص حکمہ ہذا سے ناجائز طور پر طبی سہولت حاصل کرتے ہوئے پکڑا گیا، تو اس کے خلاف قانونی کارروائی کی جائے گی۔

(Signature)

Handwritten signature



NATIONAL IDENTITY CARD NO.

1 3 3 0 2 - 6 7 3 8 7 7 8 - 5

ADMISSION / DISABILITY RECORD

DATE OF ADMISSION	DATE OF DISCHARGE	DISPOSAL
Valid upto 31-12-2011	<i>Handwritten signature</i> PERSONNEL OFFICER AARDIC HIT	

Date: 31/07/14 **DIAGNOSIS AND TREATMENT**

PAGE No. _____

OPD No. _____

مشورہ کے دن منگل بہنرات
آرہم نہ آئے یا طبیعت زیادہ خراب ہو
قند و ہارواہیم - آئی روم میں رپورٹ
نمبر (7) 25/7/14

UPT - D₃ level.

- S. Calcium.

307 & 307/2

11

Date: _____ **DIAGNOSIS AND TREATMENT**

PAGE No. _____

OPD No. _____

06-08-15

Plain Rt hip
radiating to Rt leg.
- 01 yr.

Referred to Spinal Surgeon.

Call R. Pindi physio - e
wire repair.

11

Exp. Bedding
20/8/15

Tal. Miti 7.5gms

Tal. Wilje 1, 1, 1

01/11/15

Tal. Protocol

40g HS.



خصوصی ہدایات

Add MRI
LUMBOSACRAL
Spinal
الوقیت میں کھولیں
ریسٹ، آباد
دن بعد زخم کی پٹی کھولیں۔
دن بعد نکلے کھولیں۔
O.P.D کے دن تشریف لائیں۔
دن وزن نہیں ڈالیں۔
بیساکھیوں کے سہارے چلیں۔
حسب ہدایات ورزش کریں۔

DISTRICT HEADQUARTERS HOSPITAL



HARIPUR

Discharge Card

انچارج سرجن ڈاکٹر علی عباس خان
MBBS, Master Orthopaedic Surgeon

جوائنٹ میڈیکل ہونٹ

ماہر امراض ہڈی، جوڑے، ٹھہ

Pt. Name: Lubna Andaleeb Age: 39yrs Sex: F

Admission: 644/22

Address: Pinal Mumina

D.C.A: 6/8/14 D.O.O: D.O.D: 8/2/14

Diagnosis: (L) Sciatica

Consultant:

Discharge Card Prepared BY H.O./Name _____ Sig _____

Discharge Card Checked By Dr. Name _____ Sig _____

Operation Notes

Date: _____ Time: _____

Operation: _____

Surgeon: _____

Assistant: _____

Anesthesia: _____

OP Findings: _____

Procedure: _____

Hospital Treatment

Dij Linetacil soup

iii Sol. D/water some

Home Treatment

Advised
 Complete bed rest for 02 weeks. valid from court order.

TA3 TRANSDAR
 2 x (e, 80)

TA3 FLEKAM
 2 x (e, 20)

inj. Toradol
 3 x 100mg (3)

Dr. S. S. Khan
 M.B.B.S. (C) Surgeon
 Haripur

C-12 SYP Polymix for 3
 - cy to fur 2PM

10-10-2017

sent To: _____

OUT DOOR PATIENT TICKET

DHIS - 02 (F)

39

Name Lu

Sex _____

Add No _____

Disease _____

District _____ Facility Name _____ CRP No: _____

Name _____ Father's/Husband's Name _____ Age: _____ Sex: _____

Monthly OPD Serial No. _____ Provisional Diagnosis: 85832

Date

Clinical Findings / Investigations / Treatment / Referred / Test Findings

6/8/14

① Swatwa

in Lio clausa

5% DI water

200 cc

Adt
for

Dr. Ali Shabaz Khan
stt: Orthopaedic Surgeon
HQ Hospital, Jinnah
6/8/14

Date	
<u>6/8/14</u>	

35

DIAGNOSIS AND TREATMENT

PAGE No. _____

مشورہ کے دن منگل بھرات
آرام نہ آئے یا طبیعت زیادہ خراب ہو

تبدیل پارہ ایم۔ آئی روم میں رپورٹ
نمبر 25/7/14

with D₃ level.

- S. Calcium.

CT scan

↓

DIAGNOSIS AND TREATMENT

PAGE No. _____

Date:

06-08-15

Pain Rt hip
radiating to Rt leg.

- oler.

Referred to Spinal Surgeon.

with R. Pindi physio -
with repair.

Exp. Bedden
repaired

Tal. Milti T.Syms

Tal. Wiljetta

olux

Tal. Protoual

60g Hs.



CRC No: 100218-11-0001953-03

حکومت پاکستان
نیشنل ڈسٹریبیوٹرز ایسوسی ایشن (وزارت داخلہ)
اشارہ سال سے کم عمر بچوں کا سرٹیفکیٹ

درخواست دہندہ کا نام

شقت نمبر

13302-6738778-5

درخواست دہندہ کا شناختی کارڈ نمبر

نمبر شدہ	بچے کا نام رجسٹریشن نمبر	والد کا نام شناختی کارڈ نمبر	دہندہ کا نام شناختی کارڈ نمبر	جنس رکاز لڑکی	پیدائش کا متعلق یا مکمل تاریخ پیدائش
1	نورہ شقت 13302-8100389-6	شقت محمود 13302-6738778-5	لبتی شقت	لڑکی	برقی پور 10/08/2001
2	محمد شقت 13302-5441393-7	محمد شقت 13302-6738778-5	محمد شقت	لڑکا	برقی پور 12/08/2003
3	محمد شقت 13302-7212449-5	شقت محمود 13302-6738778-5	لبتی شقت	لڑکا	برقی پور 08/01/2007

- اس فیملی کے مندرجہ بالا اشارہ سال سے کم عمر 3 بچوں کا اندراج بہتر سرکار میں موجود ہے۔
- درج شدہ بچے کی عمر اشارہ سال ہونے ہی شناختی کارڈ کے حصول کیلئے درخواست جمع کروائیں۔
- اس سرٹیفکیٹ کو سنبھال کر رکھیں کیونکہ بچوں کے کارڈ اشارہ سال کی عمر کو پہنچنے پر اپنی نمبروں کے حوالے سے ہدای کے ماتحت گئے۔
- نوزائیدہ بچے کا لوری طور پر اندراج کروائیں اور نیا رجسٹریشن سرٹیفکیٹ حاصل کریں۔
- کوائف کی تبدیلی کی صورت میں نیا رجسٹریشن سرٹیفکیٹ حاصل کریں۔

علی ارشد حکیم
دستخط رجسٹرار جنرل

تاریخ اجراء 21/04/2011

ڈاکمانہ ہائی ٹیم
ہیڈ ٹیم، فیصلہ و متعلق برقی پور



1330267387785

علی ارشد حکیم

HITEC MARGALLA CAMPUS TAXILA CANTT



Certificate of Merit

This Certificate of merit is Awarded to

Nimra Shafiqat

has obtained 3rd Position in class VIII E.

Date *26th March, 2015*

Principal

Handwritten signature

Handwritten initials and a circular stamp



School Copy
F.G Public High School, H.I.T Taxila, Cantt.

Receipt No 4419 Date: 5-5-15

Askari Bank HIT
Bank Account 1890100004128

Name of Student: Hammad Shafqat

Father's Name: Shafqat Mehmood

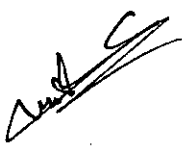
Class: IV Section: A

Roll No _____ Admission No 6453

Description	Rs.
Tuition Fee	
Late fee fine	
Admission Fee	
SLC Fee	
St Fund	
Exam Fund	
Lib Fund	
Sports Fund	
Fur Fund	
Science Fund	
Building Fund	
Comp Fund	
RDF	
Security Fund	450/-
Bank Charges	10/-
Total fee & Funds	460/-

Note: The fee / funds must be deposited in the bank between 5th to 15 th of every month; otherwise the name of student will be struck off from the school roll.


Principal's Signature



O-----03
16.05.2015

Plaintiff along with counsel present.

فقولت
سنة 2015
رجوعاً
6-6-15

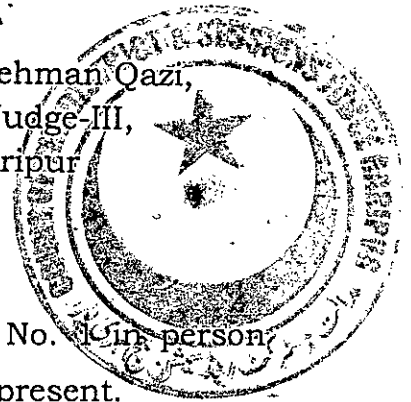
Defendants was un-served. Fresh summons to defendants be issued. Plaintiff is directed to submit copies of plaint for defendants No. 3 and 4 along with register Cover AD.

Learned counsel for plaintiff seeking adjournment for arguments.

Last chance is given to plaintiff. File to come for attendance and arguments on 21.05.2015.

Meanwhile status quo be maintained.

Ejaz-ur-Rehman Qazi,
Civil Judge-III,
Haripur



O-----04
21.05.2015

Plaintiff through counsel, while defendant No. 1 in person and defendant No. 2 to 04 through representative present.

Arguments on maintainability heard and record perused.

Record reveals that plaintiff Lubna Andaleeb w/o Shafqat Mehmood d/o Mashood Ahmad r/o Pind Muneem Post Office Bandi Muneem, Tehsil & District Haripur instituted this suit against District Health Officer, Haripur and 03 others for declaration to the effect that she performed her duty as (FMT) BHU Tofikian Tehsil & District Haripur. The letter No. 4234-4350 dated 30.04.2015 issued by defendants is based on revenge and personal liking and disliking which is ineffective upon the rights of plaintiff, hence liable to be cancellation. Plaintiff also seeks perpetual injunction and mandatory injunction that defendants be restrained to transfer the plaintiff from BHU Tofkiyan to BHU Najafpur.

Handwritten signature/initials on the left margin.

In view of arguments advanced by learned counsel of plaintiff and having perusal of record this court has an opinion derived from the judgment of August Supreme Court of Pakistan that civil servant had no legal right to remain posted at a particular place. Transfer order, if malafide and made for extraneous consideration to accommodate some blue-eyed, then matter would securely fall within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

Authorized U/A 87 of
Qanoon-e-Shahadat order: 198

Date 4/6/15

Examiner
& Session Judge
Haripur

W

ON 74/1



(11)

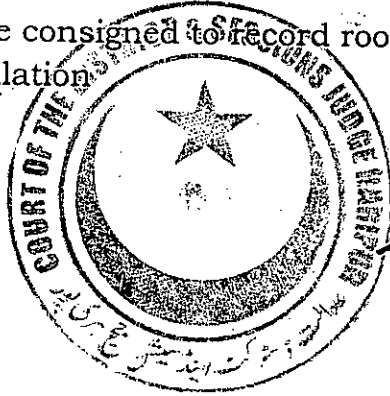
It is therefore, instant plaint is hereby returned to plaintiff under Order 07 Rule 10 CPC to file the same on proper forum (as advised). The status quo (if any) granted earlier is vacated forthwith.

Moharrir is directed to return the original plaint to the plaintiff with proper endorsement and copy of ^{which} ~~the~~ be placed on this file.

Parties are left to bear their own cost.

File be consigned to record room after its completion and compilation.

Announced
21.05.2015



[Handwritten signature]

Ejaz-ur-Rehman Qazi,
Civil Judge-III,
Haripur

No: 59832 04-6-15
 Date of presentation of Application
 No of Words 1024
 Copying Fee ML
 Urgent Fee 2
 TOTAL
 Name of Copyist
 Date of Copying of File 04-06-15
 Date of Preparation of Copy 04-06-15
 Date of Delivery of Copy 04-06-15

Attested to be true copy
Authorized U/A 87 of
Qanoon-e-Shahadat order; 198

Date 4/6/15

[Signature]
Examiner
Distt. & Session Judge
Haripur

گھالت جناب سپرنٹنڈنٹ صاحبہ پری پور

لبنی عذیبہ زوجہ شفقت محمد دُختر مسعود احمد سکنہ

پنڈ میمن ڈاٹا نہ، بانڈی میمن تحصیل ونگہ پری پور

مدعیہ
12/5/14

بنا

- 1 ڈسٹرکٹ ہیڈ کوارٹرز تحصیل ونگہ پری پور
2. میڈیکل آفیسر انچارج BHU توفکیاں تحصیل ونگہ پری پور
3. سیکریٹری ہیلتھ سروسز K.P.K یٹا نہ
4. ڈائریکٹر جنرل ہیلتھ سروسز K.P.K یٹا نہ

مدعا علیہم



(۱) دعویٰ استقراریہ مجموعہ ڈگری پری پور داد کہ مدعیہ بطور (FMT)

BHU توفکیاں تحصیل ونگہ پری پور میں اپنی ڈیوٹی سرانجام

دے رہی تھی۔ مدعا علیہم کی جانب سے جاری کردہ حکم ٹرانسفر بحوالہ آڈر

لیٹر نمبر 4350-4234-4234/2015/30-51 سراسر غلط خلاف قانون

فاتی پسند و ناپسند آمد انتظامی بنیادوں پر ہے۔ جو حقوق مدعیہ

پر ناقابل پابندی اور قابل منسوخ و مستردگی ہے۔ مدعیہ قبل

ازیا آڈر نمبری 504/2014/HR/M&E KPH/HR/M&E نمبر ۲۷-۱۰-۲۰۱۴ کی رو سے

BHU توفکیاں پری پور میں بذریعہ
مدعا علیہم نے غلط

File copy
Authorized U/A 87 of
Section 6-Shahadat order; 198
Date 4/6/15

Signature
District & Sessions Judge
Faisalabad



0.No
 11048-52 مورخہ 11-11-2014ء کیلئے سہ ماہی
 آڈر کی رو سے مدرسہ مانا جنرل آڈر میں ڈال کر بحفہ لور
 BHU میں ٹرانسفر کر دیا گیا، جو کہ قابل درستی ہے۔ اور
 مدرسہ رادرسی مدرسہ کی حقہ ادا ہے۔ بھارت ریگرن ناقابل
 تلافی نقصان ہے۔

(ب) صدر حکم امتناعی دوائی و تالیدی بنام مدعا علیہ مدرسہ
 کو BHU تو فلیاں تحقیر و تملہ لوری سے BHU بحفہ لور
 لوری پور ٹرانسفر کرنے سے علی الدوام باز رہیں اور تخواہ مدرسہ
 ہی مطابق قانون BHU تو فلیاں بی جاری کی جاوے

11-5-15

حالیہ بھری کورٹ میں اختیار سماعت عدالت حضور 100/10



جناب عالی! مضموناً دعویٰ درج ذیل ہے

1. یہ کہ مدرسہ 24 دسمبر 1998ء بطور FMT بحفہ لور
 BHU تصانیات ہوئی۔ تب مدرسہ سادی سہ ماہی نہ تھی
2. یہ کہ مدرسہ دوران ملازمت اپنی ڈیوٹی احسن طریقہ سے سرانجام
 دیتی رہی۔

3. یہ کہ آڈر نمبر 336/- 2014 KPH/HR/M&E مورخہ 24-7-2014
 کی رو سے مدرسہ کو BHU تو فلیاں سے بحفہ لور BHU
 ٹرانسفر کیا گیا۔ (نقل آفس آڈر لفظ ہے)

4. یہ کہ بعد ازاں اپنا مالا بعد 27-10-2014 کو آڈر نمبر 504/- 2014
 KPH/HR/M&E کی رو سے بحفہ لور BHU سے تو فلیاں
 BHU ٹرانسفر کیا گیا جو کہ پرمٹ آڈر تھا۔ (نقل آڈر لفظ ہے)

Attested to be true copy
 Authenticated U/A 87 of
 Qanun-e-Shahadat order; 198

Date 4/6/15

Examiner
 Dist. & Session Judge
 Haripur



یہ کہ آڈر نمبر 52-48-11 کی رو سے 11-26 کو عمرانہ نگیٹ

رشیہ تو فلیاں سے نجف پور BHU ٹرانسفر کر دیا گیا۔ اور

نگیٹ رشیہ کو نجف پور سے تو فلیاں بھیج دیا گیا جبکہ آڈر نمبر 4 سے ہنگریٹ رشیہ تو فلیاں صوبی ڈیوٹی ترقی رہی۔
نجف پور میں joining کی رقم دی۔

6. یہ کہ لہذا اب مرعیہ کو جنرل آڈر کی رو سے 4350-4234

عمرانہ 30-4 تو فلیاں سے نجف پور ٹرانسفر کر دیا گیا جبکہ

مرعیہ منتقل employee ہے۔

7. یہ کہ مرعیہ کے سراسر غلط خلاف قانون طور پر نجف ذاتی

سینہ دیا گیا جس کی بنیاد پر مرعیہ کو گزشتہ 7 ماہ سے

مسلک ٹرانسفر کیا جاتا رہا ہے۔ آڈر نمبر 4350-4234

یہ کہ 30-4 کی رو سے مرعیہ کو BHU تو فلیاں

نجف پور ٹرانسفر کا آڈر قابل منسوخی و مسترد ہے۔

8. یہ کہ مرعیہ ایک شادی شدہ خاتون ہے۔ جبکہ

3 بچے ہیں جو کہ HIT میں زیر تعلیم ہیں اور نابالغان ہیں

نمبر بھی HIT میں ملازم ہے۔ (نقل با فارم و سکول رسیدات و سرٹیفکیٹ ٹیکسٹ ایکٹ)

(9) یہ کہ مرعیہ خود بھی بیرونی آمدن کر دہنی تکلیف کی عمر لفظ ہے

اور ریٹھوئی ٹیڈی میں شدید تکلیف اور بیرونی میں qape کی وجہ

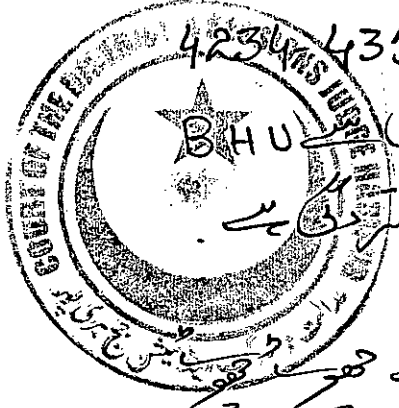
سے سفر پیمائی کر سکتی۔ بدیہا وجہ یا ڈی ایئر یا نجف پور جا کر

ڈیوٹی دینے سے قاصر ہے۔
MRI رپورٹ و دیگر نسخہ جات ڈاکٹر لفادعویٰ ہیں۔

10. یہ کہ مرعیہ لہذا آڈر 30-4 ٹی۔ ایس۔ ایم صاحب، ڈی۔ سی

یو این اے سیر ایم ایڈیکس صاحب کو بھی دی۔

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Attested to be true copy
Authorized U/A 87 of
Qanoon-e-Shahadat order; 198

Date 4/6/15

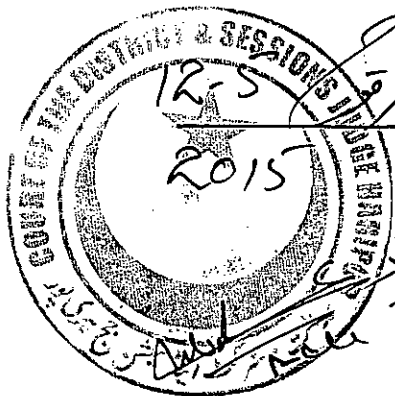
Examiner
Distt. & Session Judge
Haripur

مترکوی سنوائی نہ سیدی (نقل درخواست لفظی)

یہ مدعا علم سے متعدد بار مطالبہ متوعریہ کیا گیا مگر لیت و لعل سے مانگے رہے ہیں۔ اٹا حراساں کر رہے ہیں۔ عیواً دعویٰ یذا دائر کیا جا رہا ہے۔ چونکہ بعد از انقار مدعا علم اندر چند لوگ اندر میاں رہے۔

عدالت حضور کو اختیار سماعت حاصل ہے۔
دعویٰ کوریٹ میں سے مٹتی ہے۔

لہذا استدعا کی جاتی ہے کہ دعویٰ مدعیہ حسب
مراحت بحق مدعیہ برخلاف مدعا علم ڈگری صادر
فرمایا جاوے۔



المحقق

لبنی عنذلیب مدعیہ

Andeeb

بذریعہ وکیل خود

تعدلیق

سر شغلیت دائری مقدمہ

باقر اصرار بیان میں
کہ مندرجات دعویٰ مندرجہ
بالا میرے علم و یقین سے مطابقت
دست میں کوریٹ امر محفی از
عدالت حضور نہ رکھا گیا ہے
المحقق 12-5-2015

2015

لبنی عنذلیب

Andeeb

Attested to be true copy
Authorized U/A 87 of
Dahoon-e-Shahadat order; 199

Date 4/6/15

Examiner
Distt. & Session Judge
Haripur

جناب عالی!
قبل از یہ منجانب مدعیہ
برخلاف مدعا علم اس نوعیت
کا دیگر کوریٹ دعویٰ دائر نہ کیا
گیا ہے۔ اور نہ ہی زیر التعمیر میں ہے

المحقق 12-5-2015
لبنی عنذلیب مدعیہ

Andeeb

گھالت دیوانی ہری پور

بنتی عنذلیب سنگھ ڈسٹرکٹ سیکرٹری آف میونسپلٹی

دعویٰ استقراریہ

درخواست برابر صدور حکم امتنای عارفی تافیلہ بر خلاف مدعا علیہ کہ وہ مدعیہ کو غلط خلاف قانون طور پر ٹرانسفر کر کے جبراً اور زبردستی بھوپالور BHU بھونے اور دیگر سیکشن کی انصافی کاروائی کرنے سے علی الدوام باز رہیں۔
نمبر مطلق لیٹر نمبر 4234 - 4350 مورخہ 30/5/2018 تافیلہ مقدمہ



جناب عالی! منجانب درخواست درج ذیل

1. یہ کہ مقدمہ عنوان بالا عدالت حضور میں دائر کیا جا رہا ہے اور درخواست ہذا کو جبراً دعویٰ تصور فرمایا جاوے۔
2. یہ کہ مقدمہ عنوان بالا بادی النظر میں مدعیہ کا بہتر پتہ لکھا ہے اور مدعیہ کی کامیابی یقینی ہے۔ موقف مدعیہ نیک بنتی پر مبنی ہے۔
3. یہ کہ توازن سہولیت بحق مدعیہ موجود ہے اور بصورت عدم اجراء حکم امتنای عارفی شدیدہ اور ناقابل تلافی نقصان کا اندیشہ ہے۔ (یہاں حلفی لفظ ہے)
4. یہ کہ مدعا علیہ غلط اور خلاف قانون طور پر مدعیہ کو ٹرانسفر کر کے بھوپالور BHU ہری پور بھونے کے درپے ہیں اس ضمن میں مدعا علیہ کے خلاف حکم امتنای عارفی جاری کیا جانا ضروری ہے اور تقریباً انصافی ہے اور حکم نمبر 4234 - 4350

Requested to be this copy
Announced U/A 87 of
Qanun-e-Shahadat order, 198

Date 4/6/18

Examiner
Distt. & Session Judge
Haripur

74/1



(47)

تاریخ 30-4 قابل مطلق سے
2015

لہذا استدعا ہے کہ درخواست بڑا منظور فرماتے ہوئے حکم امتیازی
عارفی تاضیلہ مقدمہ جاری فرمایا جاوے۔

المقررہ 12-05-2015

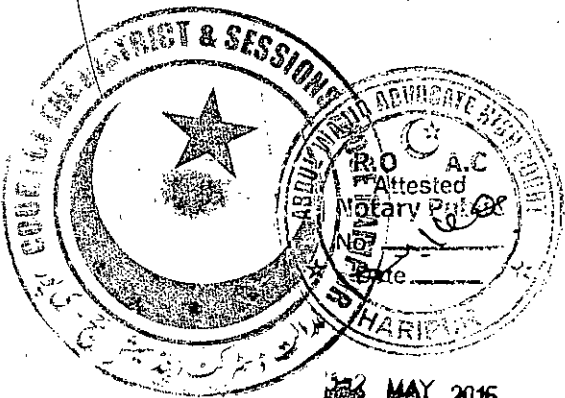
لبنی عنده لیب مرعہ بزرگہ وکیل خود
2015

Asad Deeb

Signature of Ejaz-ur-Rahman
Civil Judge, III
HARIPUR

بیان حلفی

حلفاً بیان ہوں کہ مندرجات
درخواست تا حد علم و یقین
سیر درست و صحیح ہیں کوئی
امر مخفی از عدالت حضور
نہ رہا گیا ہے۔



MAY 2015

المقررہ 12-5-2015

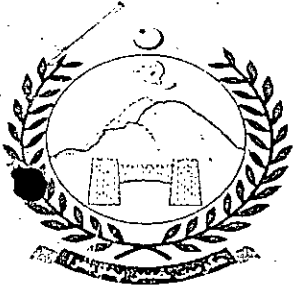
لبنی عنده لیب مرعہ
2015

Asad Deeb

Attested to be true copy
Authorized U/A 87 of
Qanoon-e-Shahadat order; 198

Date 4/6/15

Signature of Examiner
Distt. & Session Judge
Haripur



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

ANNEX (2) 48

No 6421/20 /AE-VI
Dated 16/12 /2015.

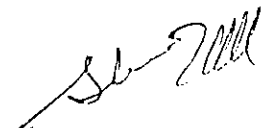
To

The District Health Officer,
Haripur.

SUBJECT: APPEAL.
Memo,

I am directed to refer to the subject noted above and to forward an application submitted by Mst: Lubna Andleeb Jr. PHC Technician (MP)/FMT which is self explanatory for information and necessary action with the remarks to direct the applicant to implement/ obey the office order bearing No. 4234-4350/Establish/D/Cancelation dated 30.04.2015 urgently, as posting against the ex-cadre post/ general duty is not covered under the rules.

Please inform her accordingly.


ASSISTANT DIRECTOR (P-III)
DIRECTORATE GENERAL HEALTH
SERVICES KPK, PESHAWAR

12/6/2015

C.C to:

Mst. Lubna Andleeb Jr. PHC Tech: (MP)/FMT BHU Tofkin Teh: &
Distt: Haripur for information & implement the order of DHO Haripur.





OFFICE OF THE DISTRICT HEALTH OFFICER,

HARIPUR.

No. 5927-30 /Estab/D/Discip.Action.
Dated Haripur, the 15/6 /2015.

(49)

ANNA
(M)

To.

Mst. Lubna Andeelb.
Jr:PHC Tech:(MP)/FMT,
Basic Health Unit, Tofkian.

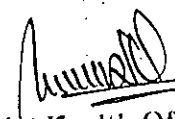
Subject:

Charge Sheet.

Memo:

You have been served with charge sheet, regarding non compliance with the orders of the competent authority & Illegal Possession of Water Restoration Items, you are directed to appear before the inquiry committee on the date fixed by them positively otherwise, ex-parte action shall be taken against you.

Encls: As above.


District Health Officer,
Haripur

No.

/Estab/D/Discip.Action;

Copy forwarded to the:-

1. District Manager, KPH, DSU, Haripur for w/r to his letter No.323 dated 11.06.2015; for information please.
2. I/c Basic Health Unit, Tofkian.
3. Dr. Imran Khan Coordinator IVM (Malaria) & Dr. Tamraiz Khan Coordinator DIHS Cell / Inquiry Committee along-with charge sheet / statement of allegations and copy of letter of District Manager, KPH, DSU, Haripur and other enclosures with the request to conduct an inquiry and report so as to proceed further in the matter.
4. Accounts Section undersigned office, with the direction to stop the pay of above named official till further through source.

District Health Officer,
Haripur.

District Health Officer, Haripur
dhoharipur@yahoo.com



50

Through registered post

OFFICE OF THE DISTRICT HEALTH OFFICER



HARIPUR.

No. 6039
Dated Haripur, the

/Estab/D/Inq.
17/6 /2015.

From: Inquiry Committee

To,

Mst. Lubna Andleeb,
(Jr; PHC Technician (MP)/FMT
Basic Health Unit, Tofkian.

Subject: Charge Sheet.
Memo:

You have been served with charge sheet regarding non compliance with the order of the competent authority. The competent authority has constituted inquiry committee to provide you the opportunity of hearing yourself under rules.

at 10.00 o'clock in the office of the Coordinator of DHIS Cell at DHO Office Haripur.

Dr. Imran Khan
Coordinator IVM / MCP
DHO Office, Haripur (Inquiry Officer)

Dated: 17 /06/2015.

Dr. Tamraiz Khan
Coordinator DHIS Cell, DHO Office
Haripur (Inquiry Officer)

Dated: 17 /06/2015.

Received on
19/06/15 by Saira B/B
Time 11-47 P.M.

District Health Officer, Haripur
Phone & Fax # 0995-610997
dhoharipur@yahoo.com

حکومت صوبہ اٹکواترک آئینر صاحب
PHO آئینر لوی
Annex
17/1

صاف حال۔
موردہ گزشتہ میں ہے کہ میں نے ایف ایم ایف
20 سال سے ایس کی پوسٹ احسن طور پر سے سر ایف ایم کے
میں اس دوران میں سرکاری آرڈر کو پیش اسلوب
سے مانتی رہیں یہاں اور ایس کی پوسٹ ایف ایم دینی ہوں۔
1984 کو جنرل آرڈر کنسل پوسٹ اس میں سر ایف ایم آرڈر کو

ہوا ہو کہ سر ایف ایم میں سر ایف ایم 11048 کے مطابق آرڈر BHA
تولکیاں میں لگا کر رکھا۔ میں آئینر آرڈر کو مانتی ہوں اور
میں نے ایس کی پوسٹ میں سر ایف ایم کے ساتھ ساتھ
میں نے ایس کی پوسٹ میں سر ایف ایم کے ساتھ ساتھ
90 دن کا ہے۔ اس دوران میں آرڈر میں ایف ایم کے ساتھ ساتھ
اس کی پوسٹ میں اس لیے میں تولکیاں میں آرڈر میں ایف ایم کے ساتھ ساتھ

BHU تولکیاں میں ایف ایم کے ساتھ ساتھ
مشکل میں سرکاری طور پر لکھی جانے والی کا انتظام نہیں تھا اور پائی کی سخت
میں ایف ایم کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ
میں ایف ایم کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ
BHU کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ
کسی کی وقت - ایف ایم کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ
کسی کی وقت - ایف ایم کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ
P.T.O

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اور حاضر کے لیے کمپارٹ منٹل اپیل کی جاتی ہے اس لیے اور
ہی BHU روٹریا میں ہی لگائی گئی۔ چونکہ اب $\frac{06}{15}$ سے
حاضر (حاضر گلیٹا F.M.T اور ایسٹ EPI) لکھتے تے
لاں اب میں آگیا ہوا ہے۔ تب سے حاضر میں لگائی۔

نہیں آگیا ہے

F.M.T
BHU Top
Date 23 $\frac{06}{15}$

BHU ڈونریاں سے پانے کا محو انتظام ہے
 حکوم سے پانے کے صفائی مشینوں سے
 مدد کے لئے ترقی عمارت کے صدر عین اور بااثر لوگوں کے
 تعاون سے BHU ڈونریاں سے پانے کا پور کر دیا
 جس سے سوال ہے :

0303522
 1795
 01000
 0500
 0500

ملک رفاقت خان ڈونریاں

2. سوار شاہہ
 3. شہزادہ نذیر احمد

13302-0453607-7
 1000

4. شیخ رشید علی خان

13302-0518680-3

5. محمد سعید علی

6. محمد رفیق ولد محمد صدیق

7. سجاد ولد محمد رفیق

8. محمد رفیق ولد محمد رفیق

9. نسیم عین شاہہ

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وٹر پمپس اینڈ
الیکٹریک موٹرز



Water Pumps & Electric Motors



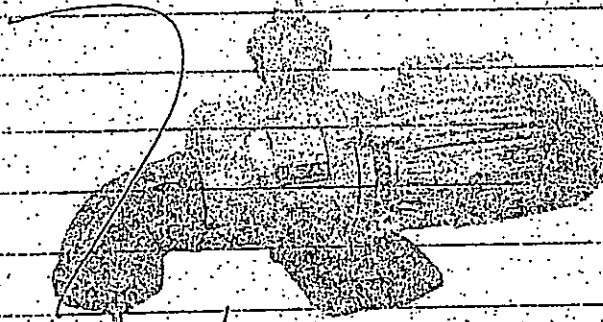
For Publicity

Date 12-10-19

4800

1050

1050



4800

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اتفاق مشینری اینڈ سینٹری سٹور

0300-5248076



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کتابتِ جامعہ دہلی
Amru: H
جامعہ عالیہ

(26)

خودمان گزارش چند آریے لکھنے ۱۵-۸-۴۰ کے مطابق
مجھ پر یہ الزام لگایا گیا ہے کہ باپ کی جوٹر باپ وکرہ
گھر سے چلے۔ جبکہ یہ میرے پاس نہ کوئی سرکاری جوٹر تھی اور
نہ ہی ڈی، ایچ، او، یا کسی ڈی این ایم سے مجھے دی۔ جو یہ
۱۹۴۱ء کو مار باپ وکرہ دی وہ میری ذاتی خرید تھی۔ اس بنیاد پر
میری سزا سنو نہ لگے تھی۔ یہ سزا سنو زیادتی ہے۔ لہذا میری فرما
پر چھاپی میری سزا سنو کھال کی جائے۔ آریے گزارش ہوئی۔

میرے

le Anil d'eb
سائل لکھنے چند لکیرے
F-M-T
B. H-U - Tajikistan
Date. 9-6-55

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30

باعتزى حيدر ابدى
میں ۷ طارق قصود نادوں میں ماکھڑا ڈالیں جو لیان کے لئے ہے
میں ۷ لیم دالے کو کرانے پر دے رہا ہوں فی صحت کرانے
۶۰۰۰ نم نم کرانے کو دی ہے

دیکھتے رہا

4-04-2010

to

5-10-2012

اس تاریخ کو گھڑا

13302-0438124-5

اس تاریخ کو خان خانی کر دیا
اب پھر ان سے کوئی لینے نہیں ہو کر

[Signature]

وکالت نامہ

کورٹ فیس
قیمتی

بعدالت جناب **حمیر مبین سروس ٹریبونل** K.P.K پشاور
 منجانب **ایپلنٹ**
لبنی عندلیب **نام**
 دعویٰ یا جرم **سروس ایبل** باعث تحریر آئندہ یہ ہے کہ
 مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جوابدہی مقام **پشاور**

شاہدہ جاوید ایڈووکیٹ ہائی کورٹ، بدیں شرط وکیل مقرر کیا۔ کہ میں ہر پیشی بد خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوں۔ اور حاضری کی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدہ مقام۔ کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقرر اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر یا بروز کچہری کے اوقات کے آگیا یا پیچھے ہونے پر منظر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرواختہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ذکر و نظر ثانی اپیل گرانی دائر کرنے نیز ہرقسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہرقسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہرقسم کا بیان دینے اور سپرد تالی و راضی نامہ و فیصلہ برخلاف کرنے اقبال دعویٰ کا اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتنابی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا ہنگی علیحدہ پیروی مختار نامہ کر نیکا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کی دل کھیل یا پیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے 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 حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے تاکہ مندرجہ بالا رضامندی مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

مورخہ: 08/10/2015

الحید الحید الحید

Aned Jedo

BEFORE THE Khyber Pakhtunkhwa service tribunal peshawar

Appeal No.810 of 2015

Mst. Lubna Andleeb Female Medical Technician Basic Health Unit Tofkian Haripur
.....**Petitioner**

Versus


1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhawa, Peshawar
3. District Health Officer, Haripur
4. District Support Manager PPHI,DSU, Haripur.

...Respondents

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Dated _____ 6/2015


Respondent No. 03
District Health Officer,
Haripur

Through counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Appeal No.810 of 2015**

Mst. Lubna Andleeb D/O Masood Ahmad, Junior PHC Technician (MP) Female Medical Technician Basic Health Unit Tofkian, Resident of village Pind Munim, PO Bandi Munim Tehsil and District Haripur**Appellant**

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Service KPK, Peshawar
3. District Health Officer, Haripur
4. District Manager PPHI, DSU, Haripur

...Respondents**Respectfully Sheweth:-**

The joint para-wise reply of the petition is as under:-

PRELIMINARY OBJECTION:

1. The Appellant has got no cause of action as she has remained posted mostly at Basic Health Unit Tofkian and other nearby coveted positions city on her own choice by using political pressure on the department.
2. The Appellant has not come to this Honorable Court with clean hands because Appellant is a chronic problematic employee and she has remained involved in malafide, illegal actions throughout her service.
3. The Appellant is habitual undutiful, disobedient and has never obeyed the orders /directives of her superiors and has remained on general duty most of the time throughout her service tenure.
4. That the Appellant occupied Govt. Accommodation in BHU Tofkian without any allotment and the recovery of House Rent to this effect has already been ordered vide letter No. 5679-82 dated 09.06.2015 which order has not been impugned by the Appellant.

FACTUAL REPLY:

1. Correct to the extent, that the Appellant was appointed at Basic Health Unit Salam Khand Ghazi on 24.12.1992 but only serving there for about 6 months she took the favor of worthy Raja Sikandar Zaman Khan Ex-Senior Minister of NWFP and was able to pressurize the respondent department for her transfer that resulted in a Charge Sheet against her by the department.(copy annexed as annex-A)
2. Incorrect. During the whole service of Appellant the superiors always disappointed of her performance as she has always remained hurdle among the local community/staffs and she kept the department under political pressure. (copy of complaints, inquiry reports and disciplinary actions are annexed as annex-B)

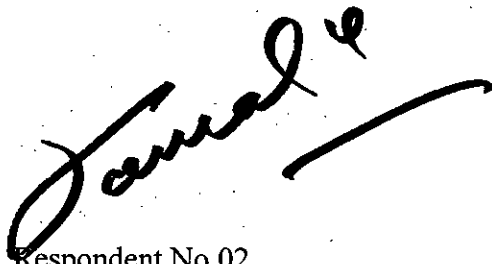
3. Correct to the extent, that the Appellant was transferred from BHU Tofkian to BHU Najafpur vide DSM PPHI Haripur office order bearing No.KPH/HR/Mad/E/2014/336 dated 24.07.2014 and but referred order No.KPH/HR/Mad/E/2014/505 dated 27/10/2014 does not relates to the Appellant. However, an order bearing No.KPH/HR/Mad/E/2014/504 dated 27/10/2014 was issued by Manager KPH, DSU, Haripur wherein the Appellant was transferred to BHU Najafpur on account of malafide, illegal actions.
4. Incorrect, the order bearing No.11048-52 dated 26.11.2014 was not issued on the basis of personal liking and disliking, the above mentioned order was issued in response to a report submitted by then District Support Manager KPH, DSU, Haripur for having found her guilty of illegal private practice during and after duty hours and recovered medicines (both Pvt. & KPH supplied) from her residence on 22/07/2014 (report and acceptance annexed as annexure-D&E). Moreover, the Appellant also accepted above-mentioned order in her written reply.
5. Incorrect. The Appellant was transferred to BHU Najafpur as per directive issued by the Director General Health Services, Khyber Pakhtunkha Peshawar vide his letter No. 4693-766 dated 20.04.2015 & No. 3680-87 dated 26.03.2015 (copy attached as annexure-F)
6. Denied, that the Appellant has leveled fabricated, concocted and baseless allegations against the respondent No.03 the explanation of the Appellant was called upon as per the report of District Manager, PPHI, DSU Haripur regarding theft of official material. In fact, the Appellant was charged guilty by the local community as well as District Support Manager KPH, DSU, Haripur and the staff members, consequently an inquiry committee was constituted to dig out the facts and the committee also provided full opportunity to clear herself but she failed. (copy of inquiry report is attached at Annexure-G)
7. Incorrect that the Appellant has also filed a civil suit before the Civil Judge-III, Haripur which was dismissed. (annexure-H)

GROUND:-

- a) That during all her service the Appellant used political sources for transfer at the place of her own choice or remained involved in malafide, illegal actions.
- b) That the Appellant preferred an appeal to the Director General Health Services through Respondent No. 03 in response, the authority has replied vide letter No.6421-22 dated 16.06.2015 with the remarks that to direct the applicant to implement /obey the office order bearing No. No.4234-4350 dated 30.04.2015 (annexure-I). Moreover, she dose not put this point before the high-ups so far and struggled for transfer from one station to another since her appointment by using political influence or due to her illegal impugned actions.

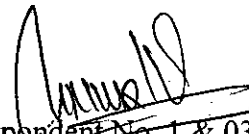
- c) That, the BHU Tofkian and BHU Najafpur are situated about 12 km away from each other, hence there should be no excuse for the Appellant to preform duty at BHU Najafpur. Moreover, she can also avail the facility of residential quarter over there.
- d) No comments, does-not relate with answering respondents.
- e) That the respondent No. 02 has sent complaint of the Appellant for disciplinary action under E&D rule vide his letter No.323 dated 11.06.2015 because respondent No. 03 is the Competent Authority in the District regarding healthcare services. (copy of the DSM PPHI letter is annexed as annexed J)
- f) In the light of this Honorable Court order released dated 23.06.2015 the salary of the Appellant has been released vide DHO Haripur order bearing No.7729-32 dated 08.07.2015 (Copy annexed as annexure-K)
- g) That in whole service of the Appellant she remained controversial in eyes of every superior, every time inquiry committees have recommended for disciplinary action against her and she always took political support at every stage whenever she was found guilty.

It is therefore, humbly prayed that the Appellant is a too much problematic and poor service provider so as the order may graciously be sustained as it has been issued by the responding department in the best interest of public service and it is also prayed that the Appeal may graciously be dismissed with cost.



Respondent No.02

**District Support Manager
PPHI, DSU Haripur.**



Respondent No. 1 & 03

**District Health Officer,
Haripur**

Date _____

Through counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Appeal No.810 of 2015**

Mst. Lubna Andleeb D/O Masood Ahmad, Junior PHC Technician (MP) Female Medical Technician Basic Health Unit Tofkian, Resident of village Pind Munim, PO Bandi Munim Tehsil and District Haripur**Appellant**

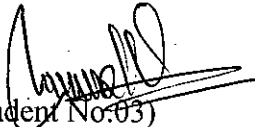
Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Service KPK, Peshawar
3. District Health Officer, Haripur
4. District Manager PPHI, DSU, Haripur

...Respondents**AFFIDAVIT**

I, Dr. Mushtaq Ahmad Khan, District Health Officer, Haripur (Respondent No.03) on the behalf of respondent No. 1 & 2 do hereby solemnly affirm and declare on oath that the contents of the reply of the foregoing Appeal are correct and true to the best of my knowledge & belief and that nothing have been concealed from this Honourable Service Tribunal.

Dated _____/2015.


(Respondent No.03)
**District Health Officer,
Haripur.**

Through Counsel:

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Appeal No.810 of 2015**

Mst. Lubna Andleeb D/O Masood Ahmad, Junior PHC Technician (MP) Female Medical Technician Basic Health Unit Tofkian, Resident of village Pind Munim, PO Bandi Munim Tehsil and District Haripur**Appellant**

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Service KPK, Peshawar
3. District Health Officer, Haripur
4. District Manager PPHI, DSU, Haripur

... Respondents

CERTIFICATE

It is certified that the appellant has concealed the facts before the Honourable Service Tribunal that appellant preferred the instant appeal before this Honourable Service Tribunal and no such like appeal has been preferred or filed in any Court or forum, while, the fact is that the appellant has already been filed the case before the court of Civil Judge-III, Haripur against the responding department which has been disposed off and after that she has another case filed before the Honourable Peshawar High Court Circuit Bench Abbottabad vide writ Petition No.665-A of 2015 against the responding department which is ongoing.

Dated _____/2015



(Respondent No.03)
**District Health Officer,
Haripur.**

Through Counsel:

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Appeal No.810 of 2015**

Mst. Lubna Andleeb D/O Masood Ahmad, Junior PHC Technician (MP) Female Medical Technician Basic Health Unit Tofkian, Resident of village Pind Munim, PO Bandi Munim Tehsil and District HaripurAppellant

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Service KPK, Peshawar
3. District Health Officer, Haripur
4. District Manager PPHI, DSU, Haripur

...Respondents

Replication of application for the suspension of impugned order No.4234-4350/Estab/D/Cancellation, dated 30.04.2015 and grant of temporary injunction till the disposal of main appeal preferred in this Honourable Service Tribunal.

Respectfully Sheweth:-

The respondent states as under:-

1. That the appellant has suppressed the facts before the Honourable Service Tribunal that "appellant referred the instant appeal before this Honourable Service Tribunal and no such like appeal has been preferred or filed in any Court or forum", while, before of this, the appellant has intentionally filed civil suit before the Senior Civil Judge-III, Haripur and after that she has another case filed before the Honourable Peshawar High Court Circuit Bench Abbottabad vide writ Petition No.665-A of 2015 just to pressurize the responding department to withdraw their orders and to prolong the proceedings. The Appellant has got no cause of action as she has mostly remained posted at Basic Health Unit Tofkian on her own choice by using political pressure. The Appellant has not come to this Honorable Court with clean hands because Appellant is a chronic problematic employee and she has involved in malafide, illegal actions throughout her service and local community is also not satisfied by her services.
1. The Appellant has leveled fabricated, concocted and baseless allegations against the respondent No.03. in her appeal, actually the Appellant is habitual undutiful, disobedient and has never obeyed the orders /directives of her superiors and has on general duty most of the time at the same BHU by using political pressure. As she is declared guilty by the DSM / Inquiry Committee for illegal actions i.e. guilty of illegal private practice during and after duty hours and recovered medicines (both Pvt. & Govt./PPHI supplied) from her residence on 22/07/2014. After disciplinary action, the Appellant preferred an appeal to the Director General Health Services through Respondent No. 03 in response, the authority has replied vide letter No.6421-22 dated 16.06.2015 with direction to the applicant to obey the Office Order bearing No. No.4234-4350 dated 30.04.2015.

It is therefore, humbly prayed that the Appellant is a too much problematic and poor service provider and the local community of the Catchment Area of BHU Tofkian is also not

satisfied with the appellant so as the order may graciously be sustained as it has been issued by responding department in the best interest of public service. Moreover, it is known fact the appellant is trying to buy more time through litigation not reporting to the health facility, where she has been transferred due to which the community is suffering.

Dated _____/2015

[Signature]
(Respondent No. 03) *for all official Respondents*
District Health Officer,
Haripur.

Through Counsel:

VERIFICATION

Verified on oath that the contents of this replication of stay application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Service Tribunal.

Dated _____/2015

[Signature]
(Respondent No. 03)
District Health Officer,
Haripur.

*Found correct
& Vetted
M. L. [Signature]
18/8/2015*

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Appeal No.810 of 2015**

Mst. Lubna Andleeb D/O Masood Ahmad, Junior PHC Technician (MP) Female Medical Technician Basic Health Unit Tofkian, Resident of village Pind Munim, PO Bandi Munim Tehsil and District Haripur**Appellant**

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Service KPK, Peshawar
3. District Health Officer, Haripur
4. District Manager PPHI, DSU, Haripur

...Respondents**CERTIFICATE**

I, Dr. Mushtaq Ahmad Khan, District Health Officer, Haripur and respondent No.03 on behalf of respondent No. 1&2 do hereby solemnly affirm and declare that the contents of accompanying **replication of the application for the suspension of impugned order passed by Respondent No. 03** are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Service Tribunal.

Dated _____/2015



(Respondent No.03)
**District Health Officer,
Haripur.**

Through Counsel:

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.810 of 2015

Mst. Lubna Andleeb D/O Masood Ahmad, Junior PHC Technician (MP) Female Medical Technician Basic Health Unit Tofkian, Resident of village Pind Munim, PO Bandi Munim Tehsil and District HaripurAppellant

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Service KPK, Peshawar
3. District Health Officer, Haripur
4. District Manager PPHI, DSU, Haripur

...Respondents

Replication of application for the grant of an interim Relief by issuing the directions to Respondent No.03 to release the salary of the applicant till the decision of main appeal preferred in this Honourable Service Tribunal.

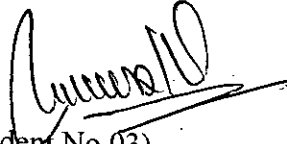
Respectfully Sheweth:-

The respondent No.03 on behalf of respondent 1&2 as under:-

1. That the appellant has suppressed the facts before the Honourable Service Tribunal that "appellant referred the instant appeal before this Honourable Service Tribunal and no such like appeal has been preferred or filed in any Court or forum", while, before of this the appellant has been filed the case before the court of Civil Judge-III, Haripur against the responding department and after that she has another case filed before the Honourable Peshawar High Court Circuit Bench Abbottabad vide writ Petition No.665-A of 2015 against the responding department. The Appellant has got no cause of action as she has remained again and again posted at Basic Health Unit Tofkian on her own choice by using political pressure. The Appellant has not come to this Honorable Court with clean hands because Appellant is a chronic problematic employee and she has involved in malafide, illegal actions throughout her service and local community is also not satisfied by her services.
2. The Appellant has leveled fabricated, concocted and baseless allegations against the respondent No.03. in her appeal, actually the Appellant is habitual undutiful, disobedient and has never obeyed the orders /directives of her superiors and has on general duty most of the time at the same BHU by using political pressure. As she is declared guilty by the DSM / inquiry committee for illegal actions i.e. guilty of illegal private practice during and after duty hours and recovered medicines (both Pvt. & KPH supplied) from her residence on 22/07/2014. After disciplinary action, the Appellant preferred an appeal to the Director General Health Services through Respondent No. 03 in response, the authority has replied vide letter No.6421-22 dated 16.06.2015 with the remarks that to direct the applicant to implement /obey the office order bearing No. No.4234-4350 dated 30.04.2015.
3. In the light of Honorable Peshawar High Court Circuit Bench Abbottad, Respondent No. 03 has released the salary of the Appellant vide DHO Haripur order bearing No.7729-32 dated 08.07.2015, therefore the appellant had no purpose to pray before Honourable

Tribunal for the same. It is therefore prayed that the application may graciously be dismissed.

Dated _____/2015

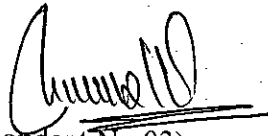


(Respondent No.03)
**District Health Officer,
Haripur.**

Verification:

Verified on oath that the contents of replication of instant application are true and correct to the best of my knowledge ad belief and nothing has been suppressed from this Honourable Service Tribunal.

Dated _____/2015



(Respondent No.03)
**District Health Officer,
Haripur.**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Appeal No.810 of 2015**

Mst. Lubna Andleeb D/O Masood Ahmad, Junior PHC Technician (MP) Female Medical Technician Basic Health Unit Tofkian, Resident of village Pind Munim, PO Bandi Munim Tehsil and District HaripurAppellant

Versus

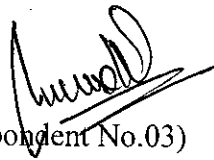
1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Khyber Pakhtunkhawa, Peshawar.
2. Director General Health Service KPK, Peshawar
3. District Health Officer, Haripur
4. District Manager PPHI, DSU, Haripur

...Respondents

Certificate; Replication of application for the issuance of directions to the respondent No.03 to release the salary of the application till the disposal of main appeal.

I, Dr. Mushtaq Ahmad Khan, District Health Officer, Haripur and respondent No.03 on behalf of respondent No. 1&2 do hereby solemnly affirm and declare that the contents of accompanying replication of the application are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Service Tribunal.

Dated _____/2015



(Respondent No.03)
District Health Officer,
Haripur.

Through Counsel:

میتا ب ڈی ریج روہا ایسٹ ایمار
مہا لجا

جو دیا نہ عرض ہے کہ جسے سلم کونڈہ ہسپتال (BHU) میں رجسٹرڈ
ہسپتال میں لیا گیا ہے جہاں پر ایچ ٹی سی اس ماہ سے اپنی
ڈیوٹی ادا کرتی ہیں اس حکام دے رہی ہیں۔ یہ جدید ڈیوٹی کے کاموں
کے کافی دور سے بندہ کسی قسم کی سہولت دینی میں نہیں
کاغذ پر اس کے بعد ہی اس کا رجسٹرڈ نام ہے اور نہ ہی اس کا کوئی
دوسرا آدمی اس کے بارے میں اس کے پاس سے اس کے بارے میں
رہنا اور وہ مشغلات سے دور رہتا ہے۔ غرضیکہ جسے بے پروا ہونا
پڑتا ہے۔ اس کے استدعا ہے کہ اسے اپنے گھر کے نزدیک ترین
ہسپتال میں ٹرانسفر کیا جائے تاکہ وہ دیکھنے میں آسانی
میں رہ سکے۔ اس کے بارے میں اس کے پاس سے اس کے بارے میں
اس کے بارے میں اس کے پاس سے اس کے پاس سے اس کے پاس سے

الغرض
میں ایگزیکٹو ڈائریکشن میں ریجسٹرڈ سلم کونڈہ

Please kindly transport
her to Bhanpur. She is a
alphan racial by and will
be a asset for the Hospital Bhanpur.

B. H. O.
Bhanpur

PP
18. 11. 73
Senior Medical
Officer, Bhanpur
B. H. O.
Bhanpur

13

(18)

ANNEXURE A

15426 / 11/12/93

Dated Abbottabad, the 29/12/93.

The District Health Officer,
Abbottabad.

The Assistant Health Officer,
Risipur.

CHARGE SHEET.

Subject: Please refer to the Divisional Director, Health Services, Hazara Division, Abbottabad anddt No. 7488-1 dated 02/12/93 and do the needful at your earliest.

District Health Officer,
Abbottabad.

15427 / 11/12/93

Copy forwarded to the Divisional Director, Health Services, Hazara Division, Abbottabad for information with reference to his anddt cited above.

District Health Officer,
Abbottabad.

(17)

Annexure - B

No. 13/69 Dated Abbottabad, the 21/7/2000.
From

The District Health Officer,
Abbottabad.

To

Mrs. Lubis Anis D.,
Female Medical Technician,
Basic Health Unit, Kholi Baza.

Subject: S.M.I.D. DUTY.
Name:-

As you were detailed to perform SMID duty in village Pind Maseen and its surrounding areas, but you refused to perform the said duty in the presence of Medical Officer incharge, Basic Health Unit, Kholi Baza and also not performed SMID duty.

You are hereby called upon to explain the reasons for non performance of SMID duty, within 7 days of the receipt of this letter, with the comments of Medical Officer incharge, Basic Health Unit, Kholi Baza, Assistant District Health Officer, Horipur, for further necessary action against you.

[Signature]
District Health Officer,
Abbottabad

*1
not
sent
PK
RMT*

No. 13/70-72

Copy forwarded to:-

- 01. Assistant District Health Officer, Horipur, for information with reference to his order No. 1507 dated 20.5.2000.
- 02. Medical Officer incharge, B.H. Unit, Kholi Baza, for information.
- 03. Accountant BHO Office, Abbottabad, to stop her;

[Signature]
District Health Officer,
Abbottabad

(S. Ahmad) - 2

within the jurisdictional domain.
On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

محترم جناب D.H.O صاحب ضلع ہری پور۔

(15)

جناب عالیہ!

مودبانہ گزارش ہے کہ FMT

بٹنی عنذلیب کا تبادلہ بی ایچ پیو لٹو قلیاں سے نجف پور مورخہ 7/5/2015 کو ہوا ہے۔ FMT بٹنی عنذلیب کو میں نے کب کا Relieve کر دیا ہے۔ لیکن اس کے باوجود FMT بٹنی عنذلیب B.H.U میں آتی ہے اور زبردستی حاضری لگانے کی کوشش کرتی ہے۔ نیز وہ B.H.U کے سرکاری کوارٹر میں رہتی ہے۔ اسلئے وہ صبح بھی اپنے کوارٹر میں سر ایف دیکھتی ہے۔ اور Time 2nd یعنی پریکٹس کرتی ہے۔ اس کے علاوہ B.H.U کے عملے کو مختلف طریقوں سے تنگ کرتی ہے لہذا آپ لوگوں سے گزارش ہے کہ معاملہ کا کوئی حل جلد درجہ لگایا جائے تاکہ B.H.U کا عملہ کو اپنی ڈیوٹی کرنے میں کوئی مشکل نہ ہو۔

العارضہ

شکریہ!

سٹاف

Forward to DHO
Haripur for further
Necessary Action.

18/6/2015
190
SING TOMKIAN
DHO, Haripur

Depd. No - 107/68

منیر احمد
لیٹو قلیاں
DHO
منیر احمد
منیر احمد
منیر احمد
منیر احمد
منیر احمد

within the jurisdictional domain of service.
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.



OFFICE OF THE DISTRICT HEALTH OFFICER HARIPUR
 PHONE NO. AND FAX NO. 0995-610997
 Email Address: dhoharipur@yahoo.com
 NO. 10528 DATE 13/11/14

Annexure -

To

The District Manager,
KPH, DSU, Haripur

AME
 CM
 11/11/14
 conduct inquiry

SUB: COMPLAINT AGAINST MST.LUBNA ANDALEEB FMT

I am enclosing herewith an application (in original) inhabitants of Village Tokkian complaint lodged against Mst.Lubna Andaleeb FMT for your information and further necessary action.

Encl: as above.

[Signature]
 5.10.2014
 District Health Officer,
 Haripur

C/O Lantop Daily letter May 2014 page 174
 13/11/2014

WHO (H)

 I L X

actual
 netup

within the jurisdictional domain of Service Tribunal.
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.

Annexure-B

Office Of The District Health Officer, Haripur.

No. 9983-55 /Estab/D/Discip.Action.
Dated Haripur, the 20/10/2014.



To,

The District Manager
KPH, DSU Haripur

Subject:

INQUIRY REPORT MST.LUBNA ANDALEEB FEMALE
MEDICAL TECHNICIAN

Memo:

In the light of inquiry report and in view of her performance in past FHT Mst.Lubna Andaleeb is hereby warned to remain careful in future. Furthermore, she should comply with the following decisions.

1. She should immediately vacate residence of Basic Health Unit Tokian.
2. Office order No.7441-45/Estb/D/Suspension dated 15/08/2014 of this office is hereby withdrawn and her pay should be released after vacation of residence.
3. For further management (transfer / posting), she is placed and disposal of DM, KPH DSU Haripur.

District Health Officer,
Haripur.

No.

/Estab/D/Discip;Action:

Copy for information is forwarded to the:-

1. Accounts Section undersigned office.
2. Mst.Lubna Andaleeb Female Medical Technician

District Health Officer,
Haripur.

dhoharipur@yahoo.com

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

RAJAN
Place is BHT
Haripur



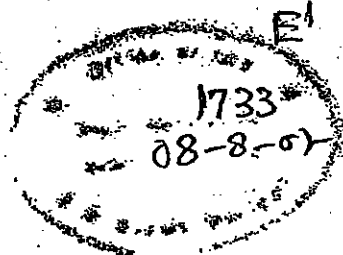
Annexure - B

DISTRICT GOVERNMENT, HARIPUR

DISTRICT COORDINATION OFFICE

No. Inspection- Health dept: 6478 /ACO (H)

Dated: 07/08 /2007.



To

The Executive District Officer
Health.

Subject: - Action Against The Staff of BHU Tofkian.

Reference meeting on the subject held on 04-08-2007 which was attended by you, ACO and other staff of BHU Tofkian.

As discussed, the following action may immediately be taken against the staff noted below:-

1. Mr. Qaisar Ali (under suspension):

The proceeding already initiated by you should be continued through the re-constituted committee.

2. Mst. Lubna Andleeb FMT:

She may be suspended and transferred on immediate basis.

3. Chowkidars.

Compulsory retirement should be ordered in respect of Mr. Javed Gul and Mr. M. Javed Chowkidars after observance of all codal formalities.

To be included in ongoing proceedings

2 offic for n...

[Signature]
District Coordination Officer
Haripur.

[Signature]
08/08

within the jurisdictional domain of Service

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

20

Annexure-B

pf
w/c
Am

Visit report of BHU Tofkian

I visited BHU Tofkian on 3.12.07 at 11.10. am. All the staff was present. The LHWs attached to this BHU were also present. I checked the attendance register and as usual half of the staff was marked present and the other columns were blank. In the whole month the LHV,s attendance was not marked. The columns of other staff members were also blank. On my query it was brought to my notice that the incharge was not permitting them to mark their attendance. She use to keep the register in lock and does not allow the staff members to take the register out of her office and the LHV was not going to FMT's office due to some clash between them, to mark her attendance, she was asking FMT to give her the register, so that she could mark her attendance, in her own room and FMT denied to do so.

During my discussion with the staff member I came to know that there is a clash between the LHV and FMT, and between the FMT and class four staff members except the Dai. Her dealings with the staff members are not compromising; in fact she is not able to handle the BHU matters, and spoiling the situation more and more.

The BHU was under repair and all the staff was dispersed. The incharge FMT occupied the MO,s residence, instead of the quarter made for them. She is not paying house rent from 10.12.05 to up till now. When I visited that bungalow I noticed that she made her office in one of the rooms and rest of the rooms were, under her personal use. IP Technician was shifted to one of the quarters, made for class four and the LHV was shifted to another quarter.

The FMT was consuming the electricity supplied to the bungalow for personal use, but not giving connection to the LHV. The LHV complained that the incharge did not allow the Dai to work with her, as her duty is with the LHV. The Dai was sitting on side

within the jurisdictional domain of service.
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.

21
Annexure-B

The LHWs attached to the BHU were suffering because of the conflict between the LHV and FMT. They were taking the advantage of the situation and not performing their duties properly. They were not obeying the LHS. Their conduct with the LHS was objectionable. LHW Rabia misbehaved with the LHS in front of the FPO, during the routine visit and FPO reported me on the same day. When I asked her to clarify the situation she put all blame on LHS and was not ready to admit her mistake and was not taking it serious.

LHWs register work was very poor, knowledge and skills were not satisfactory, their attitude towards their seniors was intolerable. I personally talked to them in the BHU and visited two of them in their health houses and observed all this.

During my visit I tried to solve some of the BHU's problems on the spot,

- First of all I told the FMT to vacate MO,s residence as soon as possible
- On the very next day EPI Tech will inform this office weather FMT vacated the residence or not
- To shift LHV,s and EPI Technician's offices to the MOs residence
- Attendance register handle over to EPI Technician to reduce the clash.
- At the end of the month the EPI Tech will send a report to this office regarding the absenteeism.
- All the staff should take care of office timings fixed by Govt.
- To use electricity for only BHU building not for personal use.
- The chowkidar will perform night duty regularly
- To park NP vehicle in the MO,s residence
- NP charged handed over to LHS for the time being.
- LHWs were warned to obey the LHS and BHU staff otherwise strict disciplinary action will b taken against them by this office.
- LHV and FMT were also warned not to spoil the situation further more for their

within the jurisdictional domain of Services

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

22
Annexure - B

On the 5th Dec 07 during the monthly meeting of LHVs, I asked from the LHV Bushra, weather the MO residence is vacated or not, she told me that, it is still occupied by the FMT and she is not willing to vacate it. On 8th Dec 07 Waheed Akhter EPI Technician came to this office and he gave the written report (copy attached) that FMT is not willfully vacating the MO,s residence.

→ The problem still exists there, because of the stubborn attitude and disobedience of the FMT and LHV. The situation is getting worse and worse. The only solution for this is the transfer of both of them from BHU Tofkian to some other place. The FMT should also recover the house rent which she has been taking since her transfer to BHU Tofkian. She was transferred to BHU Tofkian on 16.8.04 and she has been residing in the BHU since then.

Sarwat
District Coordinator
NP FOR FP & PHC
District Haripur

HRA recovery

be made for FMT Lubna Indales since occupation of MO's residence, As she occupied the house without any authorisation

1/6/07/2008 will be
done in Tofkian. 3
22/1/2008

within the jurisdictional domain of service

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

Amn exure - B



**People's Primary Healthcare Initiative
PPHI-NWFP / FATA,
District Support Unit, Haripur**
Email: pphiharipur@gmail.com

No: PPHI/HR/P&M/914
Dated: 15-02-2010.

The District Coordination Officer,
Haripur

Subject: EVACUATION OF STAFF QUARTER, BHU TOFKIAN.

Dear Sir,

317.1 PF
16/02/10

Despite transfer orders vide EDO (H) letter No. 6299-6303 dated 26-10-2009 from BHU Tokfian to RHC Khanpur, Ms. Lubna Andaleeb, Junior PHC Technician (MP) FMT, has been illegally occupying the MT residence in BHU Tokfian and has willfully kept in her personal possession the BHU furniture and other articles, thus creating problems for the poor patients visiting the BHU.

2. The Medical Officer (MO) and Support Group Committee, comprising local elders, have requested her on several occasions to vacate the MT quarter and to hand over the official equipments and furniture to the BHU. Upon their complaint, this office also served her a Notice dated 23-12-2009 to vacate the quarter in BHU, so that the newly posted MT could be accommodated there.

3. However, despite all the above requests and instructions, the FMT, has still not vacated the MT quarter nor has she handed over the equipments and furniture to the MO, BHU Tokfian, and has practically paralyzed smooth functioning of the BHU.

4. I request you to please use your administrative powers to make the FMT vacate the quarter in BHU Tokfian and to hand over the BHU equipments to the MO, so that BHU could restart its normal functioning.

[Signature]
District Support Manager

Copy forwarded to the:

- 1. Program Director, PPHI /NWFP/ FATA, Peshawar.
- 2. Executive District Officer, (E&P), Haripur.
- 3. Executive District Officer, (H), Haripur.

*Seen
considered
18/2/10*

within the jurisdictional domain of service
On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.



Annexure B

OFFICE OF THE DISTRICT HEALTH OFFICER HARIPUR
PHONE NO. AND FAX NO. 0995-610997
Email Address: dhoharipur@yahoo.com
NO. 10528 DATE 6/11/15

24

To

The District Manager,
KPH, DSU, Haripur

SUB: COMPLAINT AGAINST MST.LUBNA ANDALEEB FMT

I am enclosing herewith an application (in original) inhabitants of Village Tokian complaint lodged against Mst.Lubna Andaleeb FMT for your information and further necessary action.

Encl: as above.

[Signature]
5/10/2014
District Health Officer,
Haripur

within the jurisdictional domain of Service Tribunal.
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.

Annexure B

محبت جناب EDO ڈسٹرکٹ ہیڈ کوارٹرز صاحب قلعہ پوری پور

موردہ نامہ القاسم ہے کہ ایف، ایم، ٹی ایٹس عندیوں، بی، ایچ، پو ٹو ٹولیاں میں قائم کرتی تھی جس کا رد ماہ اپریل ٹو ٹولیاں سے بچھ پور بنیاد لے لیو گیا۔ بنیاد لے کی وجہ سے سٹاف کے سالاہ ایٹس عندیوں اور اس کے خاوند کا نامناسب رویہ اور سرکاری عہدے لینے بیچھ اتنی۔ PPHI ٹے اس کے کوارٹرز سے سرکاری عہدے لینے خود پکڑی ہے۔ لہذا آپ صاحبان سے گزارش ہے کہ ایف، ایم، ٹی ایٹس عندیوں کا تبادلہ دوبارہ بی، ایچ، پو ٹو ٹولیاں میں نہیں ہونا چاہیے۔

ورثہ لم بورن ڈیپارٹمنٹ ایچ مقررین علاقہ

بی، ایچ، پو کو تانے لگا دیے جائیں گے۔ اس کے علاوہ ایٹس عندیوں سٹریٹس کے باوجود ایف، ایم، ٹی کوارٹرز قبضہ جات بیٹھی ہیں۔ اگر وہ آٹ ٹوڑ کوئی نہ کوئی مسئلہ کھڑا کرتی ہے۔ لہذا اسے ایف، ایم، ٹی کو کوارٹرز نکالا جائے۔ تاکہ اس کے جھگڑوں سے بچاؤ حل جائے۔ مقررین علاقہ بھی اس کا تبادلہ دوبارہ بی، ایچ، پو میں نہیں ہونا چاہیے جو کہ اس کے گھر میں ابھی کچھ سرکاری سامان موجود ہیں۔ یہ گورنمنٹ کا کام ہے کہ سرکاری سامان حاصل کر لیں۔

امید ہے آپ اولین فرہم میں ان مسائل کو حل کرنے کے لئے مناسب اقدامات کریں گے۔

دستخط
D.S.M. PPHI
11/11/2024

13302-0404833-3	ڈسٹرکٹ ایف ڈی	محمد گلزار	تاریخی
13302-0438124-5	"	محمد بنارس	مطابق
13302-2324390-5	"	فضل حسین	خان
13-302-2526-890-8	"	فضل الحق	ارغی
13302-9357533-7	"	محمد گلزار	میرا خیر

within the jurisdictional domain of Service Tribunal.
On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.



PF Lubna FMT

28

OFFICE OF THE
DISTRICT HEALTH OFFICER
DISTRICT HARIPUR PHONE &
FAX NO. 0995 - 610997
No. 3614-18 dated 20/06/2013

Annexure-B

To

The District Police Officer,
Haripur

Sub: REPORT OF ROBBERY AT BHU TOFKIAN

Please find enclosed herewith an application in respect of Dr. Hameera Syed Woman Medical Officer Incharge, Mst. Lubna Andaleeb Female Medical Technician alongwith a copy of FIR for your information.

You are requested to direct the S.H.O Police Station Khanpur to investigate the matter on priority basis and a report may be submitted to this office for further necessary action.

District Health Officer,
Haripur

Cc.

1. Deputy Commissioner Haripur for information and necessary action please.
2. District Support Manager PPHI, Haripur for information. Please arrange the security etc to employees of BHU Tofkian.
3. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar for information please.
4. Honourable MPA Raja Faisal Zaman PF-49 and Honourable MNA NA-19 Raja Amir Zaman for their constituency for support and improvement environment in which the Health Care providers are performing their duties.

o/c
PF

District Health Officer,
Haripur

Rab Nawaz/Wahced

Date: 16

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

2013

Annexure B

EDO Health.

Hanipur.

Subject: Report of Robbery at BHU Tofkian.

dated Six,

ed men entered in the doctors residency in BHU
in at 01:00 a.m of 18-06-2013.

Copy of the report (FIR) is attached for further details.
is requested that please provide proper security /
kidar with official weapon on urgent basis.
waiting for your quick response.

Thanks..

yours sincerely

H Syed

DR. HUMEERA SYED

M.O Incharge

BHU Tofkian

Date: 19-06-2013

O.S.No: 75/39

www.100.com

within the jurisdictional domain of service

On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.

28

کریکٹ پیس، لاہور، ڈیپو نمبر 13/205/2005

Annexure

ابتدائی اطلاع رپورٹ
ابتدائی اطلاع نسبت جرم قتل دست اندازی پولیس رپورٹ شدہ زبردستی 152 مجرمہ ضابطہ قضاوی

تاریخ وقت رپورٹ کیجے 18/07/2005 وقت 06:30 بجے

مقام رپورٹ کیجے 31 سالہ نسوانی

مقام رپورٹ کیجے 31 سالہ نسوانی

مقام رپورٹ کیجے 31 سالہ نسوانی

مقام رپورٹ کیجے 31 سالہ نسوانی

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مقام رپورٹ کیجے 31 سالہ نسوانی

within the jurisdictional domain of Service Tribunal
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.

871
23/04/2011
FMT

From: SMO I/c. Anmexure-B
Type D Hosp. Hanpur.

29

To: The EOC(H).
Hanpur.

Subject: Theft in Conference Room.

I have to humbly stat that one GFC fan and two energy savors (Bulbs) has been taken away from the newly renovated conference room. It is worthy to mention that no door or lock was broken by anyone. and the keys are with FMT Lubna Andleeb who resides in Hospital premises and LHS (who resides in her home and only comes for any meeting).

Report is sent for further N/Achari please

No 33 2011
23-04-2011.

On 23/4/11.
Dr. S. S. Khan
SMO I/c.
TYPE D Hosp Hanpur.

Simple
- Conduct inq. &
fix responsibility
LAB - Also stop pay of chandigar
till fixation of Responsibility
Chandigar
23/4/11

within the jurisdictional domain of Service Tribunal.
On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

Annexure - B



People's Primary Healthcare Initiative
PPHI-NWFP / FATA,
District Support Unit, Haripur

23

No: PPHI/HR/P&M/998
Dated: 07-04-2010

To
Lubna Andaleeb (FMT),
RHC, Khanpur.

724
08/04/10/PF

Subject: EVACUATION OF STAFF QUARTER, BHU TOFKIAN

Reference to this office letters No. PPHI/HR/P&M/EDO (H)-805 dated 23/12/2009 and PPHI/HR/P&M/914 dated 15-02-2010 on the subject noted above.

2. Despite repeated instructions you have not yet vacated the quarter in BHU Tofkian nor have you handed over the furniture / equipment to the MO / Incharge of the BHU.

3. You are hereby warned to vacate the quarter in BHU Tofkian latest by 12-04-2010 and hand over all the articles / equipment in your possession to the MO / Incharge of the health facility. Failing this a strict disciplinary action will be initiated against you.

[Signature]
District Support Manager,
PPHI, Haripur.

C. c:

1. District Coordination Officer, Haripur for favor of information.
2. Executive District Officer (F&P), Haripur with the request to stop salary of the FMT if she didn't comply with the above orders.
3. Executive District Officer (H), Haripur.
4. Incharge BHU Tofkian.

[Signature]
10/4/10

Mohallah Ramzani, Sattar Building near NADRA Office, Tehsil Road Haripur.
Phone: 0995-520511, 0995-610019. Fax No: 0995-610019
Email: pphiftr@yahoo.com, pphiharipur@gmail.com

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.



DR. RAJA AAMER ZAMAN

Of Khanpur (Hazara) Former District Nazim Haripur
Member Central Executive Committee Pakistan Tehreek-I-Insaf

Annexure - B

Res #

Date 6/5/2015

Respected Dr. Mukhtar Ghai!
A.A
DHO Haripur.

I had telephonic conversation with you regarding Lubna Andleeb.

The order issue by you kindself on 2/1/2015 was permanent General order for Tofkean. She was drawing her salary from Tofkean.

If you can kindly look into it. I will be grateful to you. In this is a genuine request.

Yours Brother

House # 11, Street # 55, Sector F-7/4 Islamabad.
Mob: 0300-9701955 Res: 0995-640001

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

4234 - 42

Forwarded to
Barthal P.O. Sarai

Annexure - B

Phone : 0995-640240
Mob : 0312-5080538
: 0315-5080538

33



Raja Faisal Zaman

Member Provincial Assembly K.P.K-49 PML (N)

Residence: Khanpur Tehsil & District Haripur

Date 6-12-14

Ref. # _____

مقام جناب ڈائریکشن صاحب د. 40

اسلام علیہ السلام
میں رہے ہیں آپ کی چیز سے جو تو

مال رقم سالہ F.M.T. ملی آپ کے پاس

بچ رہا ہوں ان کا آڈرنگ لیاں میں لے

شکر یہ کا موقع دیں آپ کے ساتھ فون پر

بات ہوئی ہے
شکر ہے

آپ کا جی
راجہ فہیل زمان

M.P.A
14 P. 49

Raja Faisal Zaman
Member Provincial Assembly
PF-49, K.P.K

within the jurisdictional domain of Service

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

54 order
4234-43
30/4

forwarded to
Chief P.O. Sarai

Annexure - B

no: 0995-640240
: 0312-5080538
: 0315-5080538

 **Gohar Nawaz Khan**
MEMBER PROVINCIAL ASSEMBLY PK-51
Khyber Pakhtoon Khawa

Ph: +92-995-619221

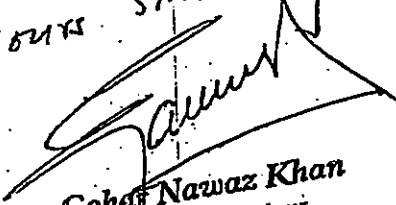
Ref: _____
Dated: _____

Honourable Dr. Mushtaq Sahib
(DHO Haripur)
A/A

e6-12 in 14

I hope you are fine. kindly
restore the transfer order of Lubra
Andaleeb Bhatti of Najafpur
to Bhatti Tajkian as a special
case please. She may please be
retained at Bhatti Tajkian pl.
Thanks

Yours sincerely


Gohar Nawaz Khan
MPA PK 51 Haripur

14 P. 49

within the jurisdictional domain of Service
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.

Annexure B

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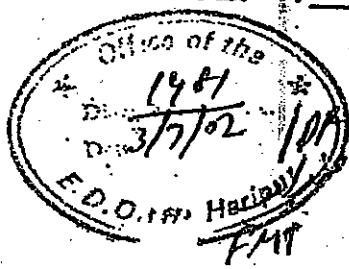


Dr. Raja Amir Zaman
Zila Nazam Haripur

Zila Nazam Seci
Haripur
Phone: 0995-6123
Fax: _____

337

Ref. No. _____
Date 2/7/2002



Dr. Latif!
EDO Health

Kindly transfer FMT
Lubwa from Tab to
Moi Nara on the interest
of public demand.

Dr. Raja Amir Zaman
ZILA NAZAM
HARIPUR

Put up to
The Secy.
for consideration
during Aug/Sept 02
per p/ty
03/02

within the jurisdictional domain of Service Tribunal.
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.



Received

**The District Support Unit Haripur
Khyber Pakhtunkhwa Primary Health Care**

36

Office Order

Order No. KPH/HR/M&E/2014-504, the following transfers / postings of staff is hereby made with immediate effect in the best public interest to the stations mentioned against each.

S. No	Name	Designation	Current place of posting	Station to which posted
01	Ms. Lubna Andleeb	Female Medical Technician	BHU Najafpur	BHU Torkham
02	Ms. Nighat Sohail	Female Medical Technician	BHU Torkham	BHU Najafpur

Both the officials are directed to submit their arrival and departure reports to this office within three days of the receipt of this order along with proper charge reports.

(Signature)
District Manager
KPH DSI Haripur

Dated: 27-10-2014.

C. c:

1. Concerned In-charges.
2. Concerned official.
3. Office copy.

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

Annexure - C

37



Annexure - C
The District Support Unit Haripur
Khyber Pakhtunkhwa Primary Healthcare

Office Order

Order No. KPH/HR/M&E/2014/336, Ms. Lubna Andleeb, FMT, working in BHU Tofkian is hereby transferred to BHU Najafpur with immediate effect in the best public interest against the available vacant position.

She is directed to submit her arrival and departure reports to this office within three days of the receipt of the order.

(Signature)
(Waheed Sultan Khan)
District Manager,
KPH, DSU, Haripur

Dated: 24-07-2014.

C. c:

1. Concerned In-charges.
2. Concerned official.
3. Office copy.

*Received LHV/EP/OPD Room
Key along with
medicine cupboard
Keys to*

*Dr. Zahid
incharge
BHU Tofkian
PPI, Haripur*

*(Signature)
Dairy # 97/65*

*FMT - Nighat Saba
in future i am
will not responsible
for any
problem in
BHU Tofkian*

A part of Sarhad Rural Support Program (Regd. under section 42 of Companies Ord., 1984)
Foot Road, Opt to Doctor Plaza, Haripur.
Phone: 0995-610019, 0995-610014, Fax No. 0995-610019, Email ppluharipur@gmail.com.

and apas

COMMISSIONER

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

OFFICE ORDER.

As reported by District Manager, KPH, DSU, Haripur vide his letter No. 34 dated 09.02.2014, Mst. Lubra Ajaib Junior PHC Technician (MP) /FMT, BPS-09 under transfer from BHU Tolkian to BHU Najarpur was found guilty in illegal private practice during duty hours and also refused to comply with the orders. Therefore, her services are hereby suspended with immediate effect and her salary is stop till further order.

Sd/-
District Health Officer
Haripur.

No. 7441-45 /Estab/D/Suspension; dated Haripur, the 15th 8 /2014.

Copy forwarded to the:-

1. District Manager, KPH, DSU Haripur for information w/r to above please.
2. I/c Basic Health Unit, Najarpur.
3. I/c Basic Health Unit, Tolkian.
4. Accounts Section undersigned office with the direction to stop the salary of the above named Female Medical Technician till further order.
5. Official concerned
For information and necessary action.


District Health Officer
Haripur. 04

dhharipur@yahoo.com

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

425
Annexure - E

Enquiry report Mst Lubna Andleeb

Mst. Lubna Andleeb FHT appointed in 1993 attached to BHU Tofkian submitted an appeal to DHO Haripur on 22/08/2014 and asked to conduct an enquiry about the incidence with reference to the DHO office order No. 7441-45/Estab/D/Suspension Dated 15/08/2014.

The above mentioned suspension order was issued in response to a report submitted by Mr. Waheed Sultan Khan District Manager, KPH,DSU, Haripur vide his office letter No. KPH/HR/M & E/2014/-347 Dated 06/08/2014. In this report, she was found guilty of.

- i. Illegal private practice during and after duty hours,
- ii. Recovered medicines (both Pvt. & KPH supplied) from her residence on 22/07/2014 by KPH staff

In the light of above, she was transferred out of the BHU Tofkian, but reportedly, she refused to comply with those orders, therefore, it was requested by DM to suspend her services and her salary may be stopped.

The competent authority directed the undersigned officers to conduct an inquiry through office letter No. 7610-15 Dated Haripur the 22/08/2014 on the subject cited above, in the light of.

All necessary documents including the personal file of said official was studied and the statements of concerned staff were recorded.

FINDINGS

After going through statements and review of records it is observed:

1. As reported an incident occurred on 21-04-2014 at about 09:00 PM at BHU Tofkian.
2. From EPI room vaccines were found destroyed / damaged. Report from EPI Coordinator,

DHO Office show that detail as follow:

- (a) OPV = 5 vial
- (b) Penta-valent vaccine = 17 vials
- (c) PCV 10 = 17 vials
- (d) Measles = 15
- (e) TT = 7

3. The persons responsible are

- a. Imtiaz EPI Technician
- b. Lubna LHV (Resident)
- c. Chowkidar. They stand responsible for

(1) Not taking proper care of the vaccines and

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

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causing damage to the high value vaccine


and employee are not residing in Govt. quarters but these are occupied by

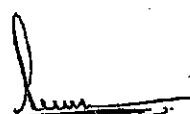
- (a) Lubna FHT instead of LHV
 - (b) EPI Technician Ayaz Ali Shah instead of dispenser.
 - (c) Javed Behishtee instead of chowkidar.
5. There is misunderstanding and conflicts among staff at BHU Tofkian. Husband of FHT Lubna is also involved in creating the fuss.
 6. FHT Lubna is indulged in practicing delivery cases at the quarter of BHUs supported by her husband Shafqat Mehmood.
 7. DSM may inform about the progress report regarding FIR and any further proceeding by the Police Authorities in this matter.
 8. FHT Lubna also did not took over the charge at BHU Najafpur after her transfer due to her illness (Medical Certificate present in record)

In the light of findings it was concluded that the allegations made by District Manager KPH DSU Haripur were correct and she is

- Involved in private practice at BHU
- Did not receive the charge after transfer

The report is submitted for further necessary action at your end please



 DR. MUHAMMAD BILAL KHAN
 COORDINATOR DHIS


 DR. ABDUR RASHEED
 PRINCIPLE MEDICAL OFFICER

District Health Officer:

In the light of ensuing report & in view of the performance in the past FHT Lubna should be removed from service & warned to remain careful in future.

- (A) She should be immediately vacate residence @ BHU Tofkian.
- (B) order no 7441-45/Estad/D Supra date 15/8/2014 of the office is to be by work down & have pay shielded & welcome after vacat in A residence.
- (C) For further on report she is placed at the disposal of DSM KPH. DSU Haripur


 DISTRICT HEALTH OFFICER
 17/8/2014

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

**OFFICE OF THE DISTRICT HEALTH OFFICER
HARIPUR.**

Annexure - E AME

(3)
(41)

28/1/14

OFFICE ORDER:

The following postings / transfers of under mentioned Junior PHC Technicians (MP) / Female Medical Technician is hereby ordered with immediate effect in the best of public interest:-

S#	Name	From	To	Remarks
1	Mst. Lubna Andleeb	Basic Health Unit Tokian	BHU Najafpur	Vice No.02 below
2	Mst. Nighat Rasheed	BHU Najafpur	Basic Health Unit Tokian	Vice No.01 above

Note: Departure/arrival reports must reach within stipulated period.

Sd/.....
District Health Officer
Haripur.

No. *11048-52* /Estab/D/Posting/transf. Dated Haripur, the *26/1/2014*.

Copy forwarded to the:-

1. District Manager, KPH, DSU, Haripur.
 2. Incharge, Basic Health Unit, Najafpur.
 3. Incharge, Basic Health Unit Tokian.
 4. Account Section undersigned office.
 5. Officials concerned.
- Fr information and necessary action.

[Signature]
District Health Officer
Haripur.

District Health Officer, Haripur
Phone & Fax # 0995-610997
dhoharipur@yahoo.com

NTK-A N

is BHU Tokian

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.



DIRECTORATE GENERAL HEALTH
SERVICES GOVT: OF KHYBER
PAKHTUNKHWA PESHAWAR

OFFICE ORDER

As already directed vide this Directorate office order bearing Endst: No. 291-391/Personnel dated 12.01.2015, and No.3620-87/Personnel dated 26.03.2015 regarding illegal posting of Doctors/ Paramedics/ Ministerial and Nursing staff etc on Ex-cadre posts or general duty, you are hereby directed to submit a certificate to the effect that no Officer / Official is posted on Ex-cadre post or on general duty.

The certificate duly signed by the DDO/Controlling Officer must reach to this Directorate with in three days positively.

You are finally directed to comply the above mentioned order within two (02) days without fail.

Sd/xxxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR.
Dated 20/07/2015

No 4698-766 /Personnel

Copy forwarded to the:-

1. All Chief Executive of Teaching Hospital Khyber Pakhtunkhwa.
2. DHS (FATA) Peshawar.
3. All DHOs/MSs in Khyber Pakhtunkhwa.
4. P.S.to Minister for Health Khyber Pakhtunkhwa.
5. P.S.to Secretary Health Khyber Pakhtunkhwa.
6. PA to DGHS, Khyber Pakhtunkhwa.
7. PA to Director (Admin) DGHS, Khyber Pakhtunkhwa.
8. DHS Cell DGHS Office.

*Post / Account
Cancel all the
details
immediately*

For information and necessary action

DIRECTOR GENERAL HEALTH
SERVICES, KHYBER PAKHTUNKHWA, PESHAWAR.

Hajir S.M. Ali Shah

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.



Copy - 67

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DIRECTORATE GENERAL HEALTH SERVICES GOVT. OF KHYBER PUKHTUNKHWA PESHAWAR

OFFICE ORDER

As already directed vide this Directorate office order bearing Endst: No. 291-391/Personnel dated 12.01.2015, regarding illegal posting of Doctors/ Paramedics/ Ministerial and Nursing staff etc on Ex-cadre posts or general duty, you are hereby directed to submit a certificate to the effect that no Officer / Official is posted on Ex-cadre post or on general duty.

The certificate duly signed by the DDO/Controlling Officer must reach to this Directorate with in three days positively.

Sd/xxxxxxxx
DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR.
Dated 28/03/2015.

No 3640-87 /Personnel
Copy forwarded to the:-

1. All C.O of Executive of Teaching Hospital Khyber Pakhtunkhwa.
2. DHS (ATA) Peshawar.
3. All DHOs/MSs in Khyber Pakhtunkhwa.
4. P.S to Minister for Health Khyber Pakhtunkhwa.
5. P.S to Secretary Health Khyber Pakhtunkhwa.
6. PA to DGHS, Khyber Pakhtunkhwa.
7. PA to Director (Admin.) DGHS, Khyber Pakhtunkhwa.

Handwritten notes:
B.S. Sub. Copy Accounts
on 19/3/15
[Signature]

For information and necessary action.

Accountant
Please prepare a list of staff working on Ex-Cadre Posts or General duty /

[Signature] 25/3/15
DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR.

Handwritten:
List of 24.3.15

Hajir S M Ali Shah

[Signature]
19/3/15

within the jurisdictional domain of Service Tribunal.

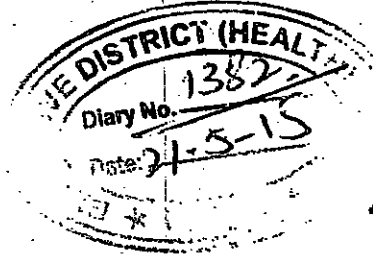
On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.



The District Support Unit, Haripur
 People's Primary Healthcare Initiative
 Khyber Pakhtunkhwa / FATA

Annex -

Handwritten initials/signature



No: PPHI/HR/M&E/2015/278
 Dated: 20-05-2015

To
 District Health Officer,
 Haripur.

Subject: REPORT ON ILLEGAL POSSESSION OF WATER RESTORATION ITEMS BY FMT.

Sir,

On 14-05-2015, staff of PPHI, Haripur visited BHU Tofkian for restoration of water supply in BHU through already existing Water Bore. This office had already supplied Electric Water Motor along with Accessories (Electric Wire, Rope and Water Pipe etc) for restoration of Water Supply, but, non of these items were found present in BHU store.

2. Upon enquiry it was found that all the above mentioned items were in personal possession of Ms. Lubna Andaleeb, FMT in her residential quarter.

3. However, staff of this office succeeded to recover Water Pipe and Rope from the official while previously supplied Electric Water Motor along with Electric Wire is still with the concerned FMT who is categorically refusing about the possession of the said items.

4. Therefore it is requested that inquiry on the matter may kindly be conducted under intimation to this office and salary of Ms. Lubna Andaleeb, FMT may kindly be stopped till the recovery of aforesaid items.

Handwritten: E.S. Lub: [Signature] DHO

Handwritten: call exp / stop the pay to [Signature] PPHI

[Signature] District Support Manager, PPHI, DSU, Haripur.

A part of Sarhad Rural Support Program (Regd. under section 42 of Companies Ord., 1984)
 Fort Road, Opt to Doctor Plaza, Haripur.
 Phone: 0995-610019, 0995-610014, Fax No. 0995-610019. Email: pphiharipur@gmail.com

within the jurisdictional domain of Service Tribunal.
On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

Form

46

To
The District Health Officer,
Haripur

**SUB: INQUIRY REPORT AGAINST MST. LUBNA ANDLEEB JR. PHC
TECHNICIAN (MP) /FMT, BHU TOFKIAN**

Dear Sir,
Mst. Lubna Andleeb Jr. PHC Technician (MP) /FMT, attached to BHU Tofkian was served with charged sheet from District Health Officer bearing Office Order No. 5927-30 dated 15.06.2015, regarding (1) Non-compliance with the orders of competent authority (2) illegal possession of water restoration items.

STATEMENT OF ALLEGATIONS

- (1) Non-compliance with the orders of competent authority.
- (2) Illegal possession of water restoration items.

The competent authority directed the undersigned officers to conduct an inquiry vide office order No. 5927-30 dated 15.06.2015 on the subject cited above, in the light of. The undersigned inquiry committee called above said official to appear before the committee on 23.06.2015 vide letter No. 6039 dated 17.06.2015.

The inquiry committee studied all the necessary documents including personnel file of the said official and statement of concerned officials and staffs were taken. The concerned official also interviewed by the committee and her written statement was taken. She was also provided with the opportunity to explain her actions verbally as well as in writing and to provide any evidence supporting her case. The committee also went through the records of KPH (formerly PPHI) /now again PPHI, District Haripur concerned with the said official.

During the course of committee received a letter from incharge BHU Tofkian through DHO bearing Names and signatures of all the staff of BHU, Stating that Lubna Andleeb FMT has been transferred and relived from BHU Tofkian but still she is occupying the BHU residence, forcefully marks her attendance in the register and interferes with the duty of the staffs of the BHU and action may be taken against her.

FINDINGS.

1. The above stated official claims that she obeys each and every order of competent authority. However, this committee finds it to be otherwise.
2. She failed to obey the order of the competent authority on multiple occasions.
3. She also kept competent authority under the constant political pressure.
4. Going through her personnel file it was learnt by the committee that she found guilty of:-
 - a) She was involved in private practice at BHU Tofkian and private and Govt. medicines were recovered from her residential quarter.
 - b) Non-compliance of transfer orders of the competent authority (DHO Office Order No.7610-15 dated 22.08.2014 & DSM PPHI Office order reference No.347 dated 06.8.214
5. The said official claims that water restoration items i.e. electric water motor, electric wire, rope, pipe etc are her personal property which she with the help of local community installed at BHU. However, she failed to provide genuine evidence /record before the committee. The committee revealed by the record of PPHI office that the items were installed by the PPHI and is Govt. property.

within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

(40) Annex-57

6. PPHI successfully recovered rope and pipe of the above said items. However, the rest of the items are still in her possession.

In the light of above the committee finds the official guilty of;

- i) Non-compliance with the orders of competent authority.
- ii) Illegal possession of water restorations.

RECOMMENDATIONS

1. Strict disciplinary action should be taken against her according to E&D rule 2011.
2. Recovery of the water restoration items should be made from the official.

The inquiry report is hereby submitted to the competent authority for further necessary action.



Dr. Imran Khan
Coordinator IVM/MCP
DHO Office Haripur



Dr. Samraiz Khan
Coordinator DHIS
DHO Office Haripur

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within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

Amir, Registered 108

[Handwritten signature]

OFFICE OF THE DISTRICT HEALTH OFFICER



HARIPUR.

No. **6039**

Dated Haripur, the

17th 6

/Estab/D/Inq.
2015.

Annexure - G

From: **Inquiry Committee**

To,

**Mst. Lubna Andleeb,
(Jr, PHC Technician (MP)/FMT
Basic Health Unit, Tofkian.**

Subject: **Charge Sheet.**

Memo:

You have been served with charge sheet regarding non compliance with the order of the competent authority. The competent authority has constituted inquiry committee to provide you the opportunity of hearing yourself under rules.

You are directed to appear before the inquiry committee on 23.06.2015 at 10.00 O'clock in the office Coordinator DHIS Cell at DHO Office Haripur.

[Signature]
**Dr. Imran Khan
Coordinator IVM / MCP
DHO Office, Haripur (Inquiry Officer)**

Dated: 17 /06/2015.

[Signature]
**Dr. Tamraz Khan
Coordinator DHIS Cell, DHO Office
Haripur (Inquiry Officer)**

Dated: 17 /06/2015.

**District Health Officer, Haripur
Phone & Fax # 0995-610997
dhoHaripur@yahoo.com**

within the jurisdictional domain of Service Tribunal.
On relying upon 2005 SCMR 17, it is held that in matter in
hand this court has got no jurisdiction.

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OFFICE OF THE DISTRICT HEALTH OFFICER,

49

No. 5927-30 /Estab/D/Discip.Action.
Dated Haripur, the 15th 2015.

Annexure-5

To,

Mst. Lubna Andeel,
Jr;PHC Tech;(MP)/FMT,
Basic Health Unit, Tofkian.

Subject:

Charge Sheet.

Memo:

You have been served with charge sheet, regarding non compliance with the orders of the competent authority & Illegal Possession of Water Restoration Items, you are directed to appear before the inquiry committee on the date fixed by them positively otherwise, ex-parte action shall be taken against you.

Encls: As above.

[Signature]
District Health Officer,
Haripur

No.

/:stab/D/Discip.Action;

Copy forwarded to the:-

1. District Manager, KPH, DSU, Haripur for w/r to his letter No.323 dated 11.06.2015, for information please.
2. I/c Basic Health Unit, Tofian.
3. Dr. Imran Khan Coordinator IVM (Malaria) & Dr. Tamraiz Khan Coordinator DHIS Cell / Inquiry Committee along-with charge sheet / statement of allegations and copy of letter of District Manager, KPH, DSU, Haripur and other enclosures with the request to conduct an inquiry and report so as to proceed further in the matter.
4. Accounts Section undersigned office, with the direction to stop the pay of above named official till further through source.

[Signature]
District Health Officer,
Haripur

District Health Officer, Haripur
Phone & Fax # 0995-610907
dhoharipur@yahoo.com

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to accommodate some blue-eyed, men matter would certainly fall within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.



OFFICE OF THE DISTRICT HEALTH OFFICER

HARIPUR.

No. 5458-10
Dated Haripur, the

/I:stab/D/Expl.
01/06/2015.

50

Annexure - B
Annexure - B

To,

Mrs. Lubna Andleeb,
Junior PHC Technician (MP)/FMT
BHU Tokian / Original place of posting
at BHU Najafpur.

Subject:
Memo:

Explanation.

The District Manager, PPHI, DSU, Haripur has reported through his letter No 279, dated 20/05/2015 that Electric Water Meter along with Accessories (Electric Wire, Rope and Water Pipe etc) of the BHU Tokian were in personal possession in your residential quarter and the same recovery of Water Pipe and Rope from you, which shows great negligence on your part.

Therefore you are directed to explain your position in writing within three days of the receipt of this letter, otherwise strict disciplinary action shall be taken against you.

District Health Officer,
Haripur

No.

/I:stab/D/Expl:

- Copy forwarded to the:-
District Manager, PPHI, DSU, Haripur w/r to above for information please.
- Account Section undersigned office with the direction to stop the copy of above named official with the direction to stop further order.

District Health Officer,
Haripur

District Health Officer, Haripur
Phone & Fax # (0995-610997)
dhoharipur@yahoo.com

the jurisdiction
from 2005 SCMR

to accommodate some blue-eyed, then matter would securely fall within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.


Annexure -

DISCIPLINARY ACTION

I, Dr. Mushtaq Ahmad Khan District Health Officer, Haripur, as Competent Authority, am of the opinion that Mst. Lubna Andleeb Junior PHC Technician (MP) / FMT has rendered himself liable to be proceeded against, as he has committed the following acts / omission, within the meaning of the rule 3 of 1 Khyber Pakhtunkhwa, Government Servants (Efficiency and Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

- i. Non compliance of orders of competent authority.
- ii. Illegal possession of Water Restoration Items.

(2). For the purpose of inquiry against the said accused with reference to the above allegations, inquiry officer/inquiry committee consisting of the following, is constituted under rule 10 (1) (a) of the ibid rules:

- i. Dr. Tamraiz Khan Coordinator DHIC Cell DHO Office Haripur.
- ii. Dr. Imran Khan Coordinator IVM (Malaria) DHO Office Haripur.

(3). The inquiry officer/ inquiry committee shall, in accordance with the provisions of the ibid rule provide reasonable opportunity of hearing to the accused, record its findings and make, within thirty day 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 inquiry officer/inquiry committee.


Competent Authority

to accommodate some blue-eyed, then matter would securely fall within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

52

Annexure - A
(46)

Signature

Handwritten notes in Urdu script, including the name 'DH' and some numbers like '21-5-12' and '15'.



0-04
21.05.2015

Plaintiff through counsel, while defendant No. 1 in person and defendant No. 2 to 04 through representative present.

Arguments on maintainability heard and record perused.

Record reveals that plaintiff Lubna Andaleeb w/o Shafqat Mehmood d/o Mashood Ahmad r/o Pind Muncem Post Office Bandi Muncem, Tehsil & District Haripur instituted this suit against District Health Officer, Haripur and 03 others for declaration to the effect that she performed her duty as (FMT) BHU Tofkian Tehsil & District Haripur. The letter No. 4234-4350 dated 30.04.2015 issued by defendants is based on revenge and personal liking and disliking which is ineffective upon the rights of plaintiff, hence liable to be cancellation. Plaintiff also seeks perpetual injunction and mandatory injunction that defendants be restrained

Handwritten notes: 1078, 584

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to be true copy of the order; 199 view of arguments advanced by learned counsel of plaintiff

and having perusal of record this court has an opinion derived from the judgment of August Supreme Court of Pakistan that civil servant had no legal right to remain posted at a particular place.

Examine
Distt. & Sessions
Haripur

Transfer order, if malafide and made for extraneous consideration to accommodate some blue-eyed, then matter would securely fall within the jurisdictional domain of Service Tribunal.

On relying upon 2005 SCMR 17, it is held that in matter in hand this court has got no jurisdiction.

DNO 76 64 74/1

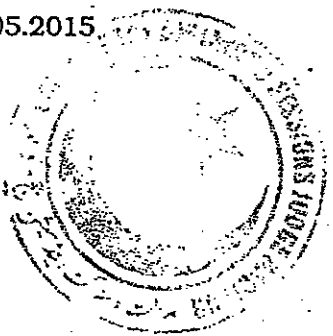
It is therefore, instant plaint is hereby returned to plain iff under Order 07 Rule 10 CPC to file the same on proper form (as advised). The status quo (if any) granted earlier is vacated forthwith.

Moharrir is directed to return the original plaint to the plaintiff with proper endorsement and copy of ~~the~~^{which} be placed on this file.

Parties are left to bear their own cost.

File be consigned to record room after its completion and compilation

Announced
21.05.2015



[Handwritten signature]

Ejaz-ur-Rehman Qazi,
Civil Judge-III,
Haripur

Attested to be true copy
Authorized U/A 87 of
Qanoon-e-Shahadat order; 198

Date *27-5-15*

[Signature]
Examiner
Distt. & Session Judge
Haripur

No. *5718-26-5-15*
Date of presentation of Application
No. of Witnesses *2*
Case No. *27-5-15*
Date of Deposition of Copy *27-5-15*
Date of Deposition of Copy *27-5-15*

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11/5/15

dd. 30/4/2015

heare Initial

Annexure

53

Annexure - II

1977



**OFFICE OF THE DISTRICT HEALTH OFFICER
HARIPUR.**

OFFICE ORDER:

Consequent upon the Director General Health Services Khyber Pakhtunkhwa Peshawar office order bearing endorsement No.4698-766/Personnel dated 20.04.2015, the following staff posted on General Duty / Detailment in various Health Facilities in the District are hereby repatriated to their original place of posting with immediate effect.

Name	Designation	BS	Working on G.D/Detailment	Original Place of posting
Dr. Muhammad Muddasar Iqbal Khan	Medical Officer	17	DHQ (II) Haripur	Type D Hosp: S.N.Khan
Dr. Tamraiz Khan	Medical Officer	17	Type D Hospital Khanpur	BHU Dingi
Dr. Shafia Sheikh	Dental Surgeon	17	CH Rehana	RHC Nara Amazai
Dr. Hassn Shaf	Medical Officer	17	DHQ(H) Haripur	CH KTS
Dr. Roheena	W. Medical Officer	17	DHQ(H) Haripur	TDH S.N.Khan
Muhammad Kafayat	Chief PHC Tech: (MP)	16	SHC Bandi Barcela	RHC Kot Najibullah
Kasim Bibi	Sr. PHC Tech: (MCH)	14	TDH Khanpur	RIIC Halli
Rokhsana Sadiq	-do-	14	CH KTS	BHU B.S.Khan
Fazmin Akhtar	-do-	14	TBC Haripur	TDH S.N.Khan
Shahbaz Begum	Jr. PHC Tech: (MCH)	09	RHC Kot Najibullah	Report to DM KPH, DSU Haripur
Shahjida Rasheed	Jr. PHC Tech: (MCH)	09	-do-	-do-
Niaz Muhammad	Jr. PHC Tech: (MP)	09	-do-	-do-
Sarwal Khan	Jr. PHC Tech: (M:P)	09	NCD Pharahalla	-do-
Amjad Nazam	Jr. PHC Tech: (M:P)	09	GD KTS No.4	-do-
Samar Iqbal	Chowkidar	01	TBC Haripur	-do-
Shahida Bibi	Dai	02	TBC Haripur	-do-
Rukhsana Begum	Dai	02	SHC Qazipur	-do-
Mahaydi Sultana	Dai	02	MCH KTS	-do-
Shahwaz	Jr. PHC Tech: (M:P)	09	SHC Qazipur	-do-
Muhammad Hassab	Sweeper	01	DHO Office Haripur	-do-
Abdul Khaliq	W/Ordely	02	-do-	-do-
Waqas Ahmad	Behishti	0	-do-	-do-
Tuza Khar	Jr. PHC Tech: (MP)/MT	09	RIIC Kalinjar	-do-
Falzeem Akhtar	Jr. PHC Tech: (MCH)/LHV	09	RHC Halli	-do-
Adnan	Chowkidar	01	DHO Office	-do-
Anna Bibi	Jr. PHC Tech (MP)	09	RIIC Halli	-do-

Official
FMT
under
recovery

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Port Manager,
U. Haripur.

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OFFY HARRI
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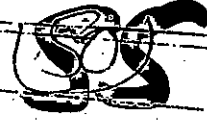
EP2015/278
05-2015

(Handwritten signature)

Annex-L

	Jamila Khatoon	Dai	02	RHC Kotnajibullah	-do-
29	Parveen Akhtar	Dai	02	DHQ Hosp:Haripur	-do-
30	Rukhsana Bibi	B/S	01	RHC Sirikot	-do-
31	Baidar Akhtar	Jr.PHC Tech;(MP)/FMT	09	CH KTS	-do-
32	Azra Bibi	Jr.PHC Tech;(MCH)/LHV	09	CH Rehana	-do-
33	Raja Maqbool Raza	W/O	02	RHC Kalanjar	-do-
34	Samia Bibi	Jr.PHC Tech;(MP)/FMT	09	Type-D Hospital, Khanpur	-do- after Iddat Leave
35	Asim Shezad	-do-	09	CH KTS	TDH Khanpur
36	Malik Muhammad Zubair	Driver	04	RHC Kot Najibullah	RHC Halli
37	Abbas Khan	N/Qasid	01	Type-D Hospital Khanpur	Type-D Hosp: Ghazi
38	Mohammad Ashraf	Lab:Attendant	01	DHQ Hospital Haripur	RHC Kot Najibullah
39	Shah Nawaz	-do-	01	CH KTS	RHC Kalanjar
40	Muhammad Khorshid	X-Ray Att:	01	DHQ Hospital Haripur	RHC Kalanjar
41	Muhammad Naeem	D/Attendant	02	-do-	RHC Kalanjar
42	Shakel Ahmed	Sweeper	02	TBC Haripur	CH Kotla
43	Chan Bibi	Ward Aya	02	TBC Haripur	CH KTS
44	Sarfraz	N/Q	02	TBC Haripur	DHO Office
45	Saceda Bibi	Jr:PHC Tech:(MCH)	09	CH KTS	TBC Haripur
46	Farkhanda Bibi	Dai	02	DHQ Hosp:Haripur	CD K.N.Bullah
47	Tasleem Bibi	Dai	02	DHQ Hosp:Haripur	CD Pharrari
48	Nabeela Khatoon	Dai	02	MCH KTS	CD KTS-3
49	Muhammad Shakoer	Behishti	02	RHC Sirikot	DHO office
50	Naheed Akhtar	Dai	02	N.Progrmmme	CH KTS
51	Muhammad Fazal	S/Petro	02	-do-	DHO office
52	Muhammad Azam Khan	Chowkidar	02	CD KTS No-3	RHC Halli
53	Rukhsana Bibi	JCT (Dental)	09	Central Jail H/P	TDS Ghazi
54	Muhammad Irfan	JCT (Pharmacy)	09	BHU Bandi Sher Khan	CD KTS No-04
55	Abdur Rasheed	Chowkidar	02	BHU Gudwalian	TDH Ghazi
56	Nawaz Akhtar	Sweeper	01	RHC Halli	TDH SN Khan
57	Hamad Farooq	JCT (Surgical)	09	DHQ Hospital	TDH Ghazi
58	Qamat Ayyaz	Store Keeper	06	CD KTS No-4	TDH Ghazi
59	Jawad Ahmed	W/O	02	BHU M.Abac	TDH Ghazi
60	Aneela Gul	Dai	02	CH KTS	MCH KTS-3
61	Nabila Khatoon	Dai	02	MCH KTS-No3	CD KTS No-3
62	Asim Khan	JCT Dental	09	DHQ Hospital	RHC Kalanjir
63	Muhammad Naeem	Behishti	01	BHU Ghumawan	CH Kotla
64	Akram Khan	Mali	01	CH KTS	RHC Nara
65	Riaz Khan	Chowkidar	01	CH KTS	Amazai
66	Malik Yaqoob	JCT (Pharmacy)	09	NCD Chooi	TDH Khanpur

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Annex - 1

Attique Rehman	Ward Orderly	02	CH KTS	BHU Dheendal
Ashroof Khan	Sweeper	01	RHC Kalinjar	CD KTS-4
Tayyab Khalid	Behishti	01	RHC Kalinjar	CD KTS-3
Lubna Andleeb	J.PHC	09	BIU Tofkian	BHU Najafpur
Parveen Akhtar	Tech(MP)FMT	02	DHQ(H) Haripur	BHU Dheendal
Niaz Mohammad	Dai	09	DHO Office (working as S/K)	TDH S.N.Khar: To work as S/K, as there is no sanctioned post at DHO office
	JCT Radiology			

Note:- Departure / Arrival reports should be submitted to this office within (07) days from the issuance of this office order, otherwise salary will be stopped and disciplinary action against the officers / officials who will not obeying the orders.

Sd/-
District Health Officer,
Haripur.


No. 4234-4350 /Etab/D/Cancellation:

Dated Haripur, the

30/04/2015.

Copy of the above is forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar w/- to above please. It is further certified that no officer / official working on General Duty / detailment.
2. PA to Secretary Health KPK Peshawar.
3. Deputy Commissioner Haripur.
4. Medical Superintendent DHQ Hospital, Haripur.
5. Superintendent Central Prison Haripur.
6. District Support Manager, DSU (PPH) Haripur.
7. Coordinator DEIS Cell undersigned office.
8. All Incharges of above named Health Institutions.
9. All above named officers / officials for compliance and report.
10. Accounts Section (Local) for n/action.


District Health Officer,
Haripur.

District Health Officer, Haripur
Phone & Fax II.0995-610997
dho@haripur@yahoo.com

transfer order, if malade...
accommodate some blue-eyed, then matter would sec
jurisdictional domain of Service Tribunal.



ST

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No 6421-22 /AE-VI
Dated 16/6 /2015.

To

The District Health Officer,
Haripur.

Annexure-1

SUBJECT: APPEAL.
Memo.

I am directed to refer to the subject noted above and to forward an application submitted by Mst: Lubna Andleeb Jr. PHC Technician (MP)/FMT which is self explanatory for information and necessary action with the remarks to direct the applicant to implement/ obey the office order bearing No. 4234-4350/Establish/D/Cancelation dated 30.04.2015 urgently, as posting against the ex-cadre post/ general duty is not covered under the rules.

Please inform her accordingly.

[Signature]
ASSISTANT DIRECTOR (P-III)
DIRECTORATE GENERAL HEALTH
SERVICES KPK, PESHAWAR

21/12/2015

C.C to:

Mst. Lubna Andleeb Jr. PHC Tech: (MP)/FMT BHU Tofkin Teh: &
Distt: Haripur for information & implement the order of DHO Haripur.

بجف پورہ اور اہل توفلیا کے درمیان سیڑھی 24-7 کو توفلیاں

2014 BHU سے بجف پورہ بھی لیا گیا۔ پھر 27-10 کو بجف پورہ

2014 سے توفلیاں BHU ٹرانسفر کیا گیا۔ جوہ پرمٹ آڈر تھا۔

پھر ایک ماہ بعد 26-11 کو توفلیاں سے بجف پورہ بھیجا۔

۱۱-۲۰۱۴ میں اپنا نہ حکم حکم حاکم بیماری کی حالت میں ہی بجالات

رہی۔ ۰۱-۲۰۱۵ کو بجف پورہ سے توفلیاں بھی لیا گیا۔ مدیر/اپلانٹ

۲۰۱۵ نے پھر بھی حکم کی بجائے اور کی۔ مگر اب حالیہ آڈر متدعویہ

30-4-15 4234-4350/ESTAB/D/cancellation

کی رقم سے من اپلانٹ کی ٹرانسفر سیریل نمبر ۱۰۶

مطابقت توفلیاں سے بجف پورہ کر دی گئی ہے۔ جوہ سراسر

نا انصافی، سروس رولز کی خلاف ورزی اور خلاف قانون

ہے۔ کیونکہ من اپلانٹ ایک منتقل employee ہے۔

جوہ ۱۹۹۲ سے اپنی ڈیوٹی منتقل سراجیم کر رہی ہے۔

جبکہ متدعویہ آڈر جنرل ہے۔ (تقریرات آڈر ایک ٹف ہیں)

5. یہ کہ 2014 - 2015 سے ٹرانسفر مذکورہ جوہی جاری

ہے۔ جوہ انسانی حقوق کی خلاف ورزی کے ساتھ ساتھ

سروس رولز کی بھی خلاف ورزی ہے۔ جس میں Tenure سیرٹ

کو مد نظر نہ رکھا گیا ہے۔ اور اپلانٹ کی ٹرانسفر ذاتی پسند

اور پاسپورٹ کی بنیاد پر لیا جاتا رہا ہے۔ جبکہ ٹرانسفر ذاتی

عناد و پسند و ناپسند کی بنیاد پر من بند Public interest

کی جاتی ہیں۔ لیکن مذکورہ متدعویہ آڈر ذاتی پسند و ناپسند

پر لیا گیا۔ جو کہ بالکل خلاف قانون خلاف واقعات

اور قابل منفعی ہے۔

Amner

لاہور

یہ ایک ایلاسنڈ کے بچے نابالغان ہیں جنکی عمر یہ بالترتیب
 12 سال، 10 سال، 7 سال ہیں۔ (نقل بافارہ) لٹ (بھ)
 جرنہ HiT کینٹ نیگلا میں زیر تعلیم ہیں۔ میرے سٹیویر شفقت
 محمود ہی HiT نیگلا کینٹ میں ملازمت کرتے ہیں۔ میں
 فزکری اپنے گھر کی کفالت کرنے کیلئے کرف میوں۔ نجف پور BHU
 چل جانے سے میری بیماری میں بھی اضافہ ہوگا اور میرے گھر کا
 نظام بھی درم برہم ہو جائے گا۔

استدعا ہے کہ میری اپیل کو منظور فرماتے ہوئے میرے
 خلاف جاری کردہ آرڈر

4234-4350/ESTAB/D/Cancellation

صفحہ 30-31
 2015

میں یہ ڈیوٹی جاری رکھنے کی بہت مناسب اجکامات
 صادر فرمائے جائیں۔ اپیل یذا کا فیصلہ

Humantarian Ground

پر صادر فرمایا جاوے۔

شکریہ

لبتی عنذیب FMT پوسٹ توفلیاں BHU

تحصیل فضل پوری پور

Abul

Ammer-1
(Signature)



Ammer-1

The District Support Unit, Haripur.
People's Primary Healthcare Initiative
Khyber Pakhtunkhwa.

Most Imp. 2015

No: PPHI/HR/M&E/2015/378
Dated: 11/06/2015

To
District Health Officer,
Haripur.

Subject: ABSENTEE REPORT OF LUBNA ANDLEEB, FMT.

Sir,

Please refer to your office Order No. 4234-4350/Estab/D/Cancellation. dated 30-04-2015. Ms. Lubna Andleeb, FMT, working on General Duty at BHU Tofkian was transferred to BHU Najafpur against the available vacant post, however, the official has refused to comply with the official order by the competent authority.

2. Now, Independent Monitoring Unit (IMU) has reported her absent from her duty at BHU Najafpur which puts a question mark on the performance of both PPHI and District Health Department.

3. Therefore, it is requested that salary of the official may kindly be stopped along with strict disciplinary action under F&D rules.

(Signature)
District Support Manager,
PPHI, DSU, Haripur.

Not for
w/a

(Signature)

Dated 6/2015

Document No. 03
District Health Officer,
Haripur

Through counsel

Annex-k

Annexure k
30



OFFICE OF THE DISTRICT HEALTH OFFICER, HARIPUR
Phone & fax No.0995-610997, email dhoharipur@yahoo.com
Situatd at Women & Children Hospital Haripur

No. 7729-32

Dated Haripur the 08/07/2015

To

The Senior District Accounts Officer,
Haripur

SUB: RELEASE OF PAY

Memo:

Please find enclosed herewith the copy of letter No.1287 dated 26.06.2015 sent by the Additional Registrar, Peshawar High Court Abbottabad Bench in which stated that an order regarding writ petition No. 665-A of 2015 case title "Mst. Lubna Andleeb versus Govt. of KPK & Others passed by the Honourable Court D.B to extent of stoppage of salary of the petitioner is hereby suspended.

It is therefore, requested may kindly the release the pay of Mst. Lubna Andleeb Jr. PHC Technician (MP) FMT, Basic Health Unit Tofkian with immediate effect in compliance of Honourable Court.

DISTRICT HEALTH OFFICER
Haripur

Copy of the above is forwarded to the:-

1. Additional Registrar, Peshawar High Court Abbottabad Bench for information w/r to his letter cited above.
2. Accounts Section of the undersigned office for needful.
3. Official concerned for information.

DISTRICT HEALTH OFFICER
District Health Officer,
Haripur

Dated _____ 6/2015

District Health Officer,
Haripur

Through counsel

45/2

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 810/2015

Mst. Lubna Andleeb

VERSUS

Govt. of KPK through Secretary
Health KPK and others.

(Appellant).

(Respondents).

RE-JOINDER ON BEHALF OF APPELLANT (MST.LUBNA ANDLEEB)
AGAINST COMMENTS FURNISHED BY RESPONDENTS NO. 1&4.

PRELIMINARY OBJECTIONS:

1. Para-1 is denied being incorrect.
2. Para-2 is baseless & false, hence denied.
3. Para-3 is also baseless & false, hence denied.
4. Para-4 as explained is not correct. The order dated 09-06-2015 being illegal has been made impugned in para-(h) of the grounds of the instant service and request has been made for its setting aside. Hence this para is vehemently denied.

FACTUAL REPLY:

1. That para-1 is incorrect except the date of appointment of the appellant 24-12-1992. Appellant served at different stations and she was transferred from Tehsil Ghazi to Tehsil Haripur in service interest and not on any recommendation. Hence this para is denied.

2. That para-2 is denied being incorrect. Papers annexed-B are false and fabricated. There was no complaint from public against the appellant. If the documents attached at Annex-B are perused will show that these pertain to the entire of Hospital and to the appellant.
3. That para-3 is incorrect hence denied. Transfer vide order dated 27-10-2014 was made in public interest and not account of malafide, illegal actions.
4. That Para-4 being incorrect is vehemently denied. The transfer of appellant vide order 26-11-2014 was made on the basis of liking and disliking. In para-8 of the inquiry report dated 17-10-2014 it is admitted by the Inquiry Officers in their words which are reproduced as "FHT Lubna did not took over the charge at BHU Najafpur after transfer due to her illness (Medical Certificate present in record). Hence appellant order dated 27-10-2014 from BHU Najafpur to Tofkian was in public interest and on the basis of inquiry report.
5. That Para-5 is vehemently denied being incorrect. The appellant's transfer on the basis liking and disliking and in seriour violation to departmental rules & regulations from BHU Tofkian to BHU Najafpur was made on 30-04-2015 just after 06 months of his transfer from Najafpur to Tofkian fide order dated 27-10-2014.

(3)

6. That para-6 is false and fabricated hence denied. Baseless allegations have been made in this para. Appellant has purchased water restoration material herself with the help of locality. No material was ever provided in the BHU by PPHI DSU Haripur. Appellant denied the allegations before the so-called inquiry committee. She produced purchase receipt water sucking motor. The so-called could not establish the allegations as were made in the explanation. No witness was produced before the inquiry committee against the appellant to corroborate the allegations. Nor the appellant was provided with the opportunity to cross examine the witness if any. Even no documentary evidence was produced against the appellant before the inquiry committee nor was appellant confronted with such documentary evidence if any. The allegations as without any proof, hence denied.

7. That para-7 is incorrect hence denied. It is totally incorrect that appellant's civil suit was ever dismissed. The appellant filed a civil suit before the Honourable Civil Judge-III, Haripur for setting aside impugned transfer order which was returned to her vide order dated 12-05-2015 for want of jurisdiction under order -7 Rule-10 CPC.

GROUND:

- a) That allegation of using political sources for transfer during service is incorrect, concocted and baseless. The departmental authorities are not bound to act upon the

directions of the political authorities rather they are to follow the Civil Servant Act and Departmental Rules and Regulations. According to the case law "1993-SCMR-1287" Apex Court of the country has rendered in its judgment that "Ministers are under oath to discharge their duties in accordance with the Constitution and the departmental authorities competent to make appointment are obliged to exercise their judgment and discretion honestly and objectively without being influenced by the judgment of anyone else including their superiors.

- b) That detailed reply has been given in para-a above. The appellant had not completed her tenure at BHU Tofkian when she was transferred to BHU Najafpur illegally, unlawfully and against the departmental rules and regulations without any reason and rhyme.
- c) That the appellant is facing pain in her back bone and is unable to move or travel to the hilly area. In this context MRI Reports and diagnosis evidence have already been annexed with the appeal at annex-I.
- d) That appellant has minor school going children and appellant's husband has also been working in H.I.T. Taxila. There is no one to look after the children of appellant. Transfer of the appellant through impugned order is against the departmental rules and regulations and is premature without completing tenure of transfer.

(5)

- e) That Appellant had purchased water restoration material herself with the help of locality. No material was ever provided in the BHU by PPHI DSU Haripur. Appellant denied the allegations before the so-called inquiry committee. She produced purchase receipt of water sucking machine. The so-called could not establish the allegations as were made in the explanation. No witness was produced before the inquiry committee against the appellant to corroborate the allegations. Nor the appellant was provided with the opportunity to cross examine the witness if any. Even no documentary evidence was produced against the appellant before the inquiry committee nor was appellant confronted with such documentary evidence if any. Neither any show cause notice was issued nor was appellant provided with the opportunity of personal hearing. Allegations denied being without proof.
- f) That during the pendency and in retaliation of departmental appeal the respondent No. 3 issued an explanation to the appellant on baseless grounds and also forwarded copy of the same to the Account Section and stopped the salary just to victimize and make appellant as well as her school going minor children to suffer financial hardships. Then appellant filed a writ petition before the Honourable Peshawar High Court Peshawar (Abbottabad Bench) requesting therein release of her salary and on the orders of High Court the respondent No. 3 had to release her salary which act of the respondent No. 3 was illegal, unlawful, grave unjust and based on biasness and malafide.

(6)

- g) That during her entire service of more than 22 years, the appellant always performed her duties with zeal, zest, devotion and honesty. Baseless and concocted allegations have been asserted in para-g of the reply which are vehemently denied.

Other relevant points will be advanced and argued with the permission of this Honourable Tribunal at the time of hearing the case on behalf of appellant.

It is, therefore, humbly prayed that on acceptance of the instant service appeal the impugned order dated 16-06-2015 passed by respondent No. 2 the Director General Health Peshawar whereby the departmental appeal of the appellant has been rejected as well as order No. 4234-4350/Estab/D/Cancellation dated 30-04-2014 whereby appellant has been transferred from BHU Tofkian to BhU Najafpur Haripur illegally and on the basis of malafide intention, personal liking and disliking without considering the tenure may graciously be set aside and the appellant be allowed to perform her duty at BHU Tofkian and recovery of house rent be stopped forthwith till the disposal of instant appeal. Any other relief which this Honourable Service Tribunal deems fit may also be granted.

Sh. Anwar

Appellant

Shahida Javed

**(SHAHIDA JAVED)
ADVOCATE HIGH COURT
At Haripur**

Dated: 17-11-2015

Verification:-

Verified on oath that contents of instant rejoinder/rejoinder application are correct to the best of my knowledge and belief.

Sh. Anwar

Appellant

Dated: 17-11-2015

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 810/2015

Mst. Lubna Andleeb
(Appellant).

VERSUS

Govt. of KPK through Secretary
Health KPK and others.
(Respondents).

RE-JOINDER ON BEHALF OF APPELLANT (MST.LUBNA ANDLEEB) AGAINST
COMMENTS FURNISHED BY RESPONDENTS NO. 1&4.

Replication of application for suspension of impuged order No.4234-4350/Estb/D/Cancellation dated 30-04-2015 and grant of temporary injunction till the disposal of main appeal.

Respectfully sheweth:-

The appellant states as under:-

1. Para-1 of the replication is denied being incorrect. Appellant never concealed any facts from this Honourable Service Tribunal and has candidly mentioned in ground (e) of the main petition that she approached to the civil court for quick remedy but her plaint was returned having no jurisdiction to entertain the case and directed to approach proper forum. Copy of plaint and order has already been annexed-K with the main appeal.
2. Para-2 of the replication is denied being false, fabricated.
3. Prayer clause of the replication is vehemently denied being as baseless.

ls Andleeb
Appellant

Through

Shahida Javed
(SHAHIDA JAVED)
ADVOCATE HIGH COURT
At Haripur

Dated: 17-11-2015

Verification:-

Verified on oath that contents of instant rejoinder/rejoinder application are correct to the best of my knowledge and belief.

ls Andleeb
Appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 810/2015

Mst. Lubna Andleeb
(Appellant).

VERSUS

Govt. of KPK through Secretary
Health KPK and others.
(Respondents).

RE-JOINDER ON BEHALF OF APPELLANT (MST.LUBNA ANDLEEB) AGAINST
COMMENTS FURNISHED BY RESPONDENTS NO. 1&4.

Replication of application for grant of interim relief by issuing the directions to
respondent No.3 to release the salary of applicant till the decision of main appeal
preferred in this Honourable Service Tribunal.

Respectfully sheweth:-

The appellant states as under:-

1. Para-1 & 2 of the replication is denied being incorrect. Appellant never concealed any facts from this Honourable Service Tribunal and has candidly mentioned in ground (e) of the main petition that she approached to the civil court for quick remedy but her plaint was returned having no jurisdiction to entertain the case and directed to approach proper forum. Copy of plaint and order has already been annexed-K with the main appeal.
2. Para-3 of the replication to the extent of release of appellant's salary is correct. But now respondents have started illegal, unlawful deduction of rent from the salary of appellant with malafide intention just to victimize and make the appellant and here minor school going children to suffer financial hardships.

Prayer clause of the replication is vehemently denied being as baseless.

B Andleeb

Appellant

Through

Shahida Javed

(SHAHIDA JAVED)
ADVOCATE HIGH COURT
At Haripur

Dated: 17-11-2015

Verification:-

Verified on oath that contents of instant rejoinder/rejoinder application are correct to the best of my knowledge and belief.

B Andleeb

Dated: 17-11-2015

Appellant



OFFICE OF THE DISTRICT HEALTH OFFICER
HARIPUR.

OFFICE ORDER.

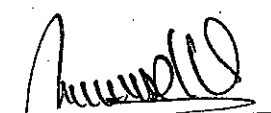
Mrs. Lubna Andleeb PHC Technician (MP) / FMT working at Basic Health Unit, Tofkian is hereby posted / adjusted at Basic Health Unit, Tofkian against the vacant post of PHC Technician (MP) / Medical Technician with immediate effect in the best of public interest.

Sd/-
**District Health Officer,
Haripur.**

No. 5928-32 /Estab/D/Adjst; Dated Haripur, the 04/08 /2016.

Copy forwarded to:-

1. District Support Manager, PPHI, DSU, Haripur.
 2. Coordinator DHIS Cell undersigned office.
 3. I/c Basic Health Unit, Tofkian.
 4. Account Section undersigned office.
 5. Official concerned.
- For information and n/action.


**District Health Officer,
Haripur.**

District Health Officer, Haripur
Phone & Fax # 0995-610997
dhoharipur@yahoo.com