


11.5.2020

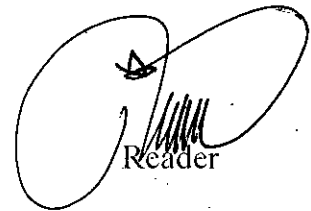
Due to COVID19, the case is adjourned to

4/8/2020 for the same as before.


Reader

04.08.2020

Due to summer vacation case is adjourned to 05.10.2020 before D.B for the same.


Reader

05.10.2020

Miss Rabia Muzaffar Advocate counsel for appellant present.


Zara Tajwar learned Deputy District Attorney alongwith Hazrat Shah S.O for respondents present.

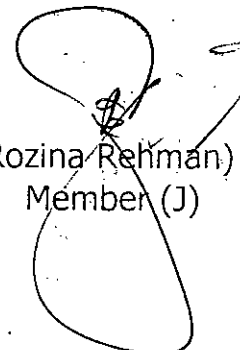
At the very outset, Tribunal was informed about the death of the appellant with a request for withdrawal of the instant case. To this effect, statement of learned counsel for appellant was recorded on the margin of order sheet.

In view of the above, the instant appeal stands dismissed as withdrawn. No order as to costs. File be consigned to the record room.

Announced

05.10.2020

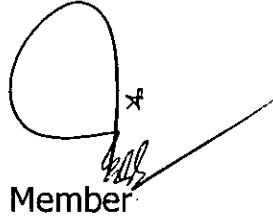

(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

Due to the death of the appellant
I donot want to pursue this appeal anymore.
in absence of appellant hence the same may be
dismissed with degression
Rabia

11.03.2020

Counsel for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 11.05.2020 before D.B.


Member


Member

25.09.2019

Junior to counsel for the appellant and Mr. Amjad Ali Senior Clerk on behalf of respondent No. 4 present.

Reply of respondent No. 4 already furnished. Fresh notices be issued to respondents No. 1 to 3 by way of last chance. Adjourned to 22.10.2019 for submission of requisite reply/comments.

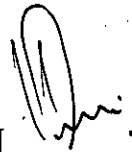


Chairman

22.10.2019

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Amjid Ali, Senior Clerk on behalf of respondent No. 4 present.

Written reply on behalf of respondents No. 4 already submitted. Respondents No. 1 to 3 failed to submit their written replies despite last chance, therefore, the case is posted to D.B for 07.01.2020 for rejoinder and arguments.



CHAIRMAN

07.01.2020

Junior to counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Amjid Ali Senior Clerk present and submitted reply. Junior to counsel for the appellant requested for adjournment. Adjourn. To come up for arguments on 11.03.2020 before D.B.



Member



Member

20.05.2019

Learned counsel for the appellant present. Security and process fee not deposited. Learned counsel for the appellant submitted application for extension of time to deposit the same. Application is allowed with direction to deposit security and process fee within 7 days. Thereafter notices be issued to the respondents for written reply/comments. Adjourn. To come up for written reply/comments on 02.07.2019 before S.B.

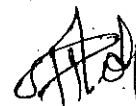
Appellant Deposited
Security & Process Fee



Member

02.07.2019

Appellant absent. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned Additional Advocate General seeks time to furnish written reply. Granted. To come up for written reply/comments on 28.08.2019 before S.B.




Member

28.08.2019

Counsel for the appellant, Addl. AG alongwith Muhammad Asif M.O and Amjad Ali, Assistant for the respondents present.

Written reply of respondent No. 4 has been submitted which is placed on record. To come up for written reply/comments of respondents No. 1 to 3 on 25.09.2019 before S.B.



Chairman

05.04.2019

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that he was serving as Principal Medical Officer, D.H.Q Hospital, Mardan. When he received salary slip for the month of October, 2018, it revealed that one day salary had been deducted by the respondents. On 02.11.2018, the appellant obtained copy of order dated 15.09.2018 and filed departmental appeal against the impugned order which was not decided within the stipulated period, hence, the instant service appeal. Deduction of salary without enquiry was illegal and unlawful.

Points urged need consideration. Admit, subject to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 20.05.2019 before S.B.

11/3/19

(AHMAD HASSAN)
MEMBER

20/05/2019

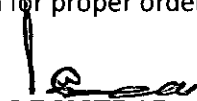

Learned counsel for the appellant present. Written reply submitted by Mazra Shabir Superintendent (for respondent No. 1) and Mr. Ali Shabir Superintendent (for respondent No. 2) present on behalf of private respondent No. 2. Respondent No. 3 as absent representative of official respondent be put on notice with direction to furnish written reply/comment. Appellant to come up for written reply/comment on 02.07.2019 before S.B.

(Member)

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 372/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/03/2019	<p>The appeal of Dr. Khalil-ur-Rehman resubmitted today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 18/3/19</p>
2-	26/03/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/04/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Dr. Khalil-ur-Rehman Principal Medical Officer DGQ Hospital Mardan received today by i.e. on 01.03.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of impugned order and departmental appeal against it are not attached with the appeal which may be placed on it.
- 3- The documents referred to in the memo of appeal are not annexed with the appeal.
- 4- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 357 /S.T.

Dt. 01/3 /2019

M. S. S. S.
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fazal Shah Mohmand Adv. Pesh.

Six Pleas Required further
time

col G
15/3/19 (Adv)

7 days further extended.

Six, Resubmitted after necessary
completion.

col G
18/3/19 (Adv)

hasan
15/3/19.

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 372 /2019

Dr. Khalil Ur Rehman.....Appellant

VERSUS

Govt. and others.....Respondents.


INDEX

S No	Description of Documents	Annexure	Pages
1.	Service appeal with affidavit		1-3
2.	Copy of Pay Slip	A	4
3.	Copy of Order dated 15-09-2018 & departmental appeal dated 02-11-2018	B & C	5-6
4.	Copy of duty rota	D	7-8
5.	Wakalat Nama		9

Dated:-15-02-2019


Appellant

Through


Fazal Shah Mohmand
Advocate, Peshawar.

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841
Email:- fazalshahmohmand@gmail.com

- 1 -

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 372 /2019

Dr. Khalil Ur Rehman, Principal Medical Officer, District Headquarter
Hospital, Mardan.Appellant Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 297
01/3/2019

1. Government of KPK through Chief Secretary Civil Secretariat Peshawar.
2. Secretary, Health Department, Govt. of KPK Peshawar.
3. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
4. Dr. Abdul Latif, Medical Superintendent, DHQ Hospital, District, Mardan.

.....Respondents

APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE OFFICE ORDER DATED 15-09-2018 PASSED BY RESPONDENT NO 4 WHERE BY ONE DAY SALARY HAS BEEN DEDUCTED FORM THE APPELANT AND AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINTY DAYS.

PRAYER:-

Filed to-day On acceptance of this appeal the impugned Office Order dated 15-09-2018 to the extent of the appellant may kindly be set aside and the appellant may kindly be paid the deducted salary with all service benefits.

Respectfully Submitted:-

1. That the appellant is highly qualified and is presently serving as Principal Medical Officer, District Headquarter Hospital, Mardan and since appointment has performed his duties efficiently and to the entire satisfaction of his high ups.
2. That the appellant have always performed his duties with due diligence and never became absent, however after observing his pay slip for the month of October 2018, he was shocked to know that one day salary has been deducted from him however no order was ever communicated to him. **(Copy of Pay Slip is enclosed as Annexure A).**
3. That on 02-11-2018 the appellant obtained copy of the order dated 15-09-2018 and filed appeal the same day, which has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of order dated 15-09-**

Re-submitted to -day
and filed.

Registrar
19/3/19

- 2 -

2018 and departmental appeal dated 02-11-2018 is enclosed as Annexure B and C).

4. That the impugned order dated 15-09-2018 to the extent of the appellant is illegal, unlawful, without lawful authority on grounds inter alia as follows:-

GROUND:-

- A. That the impugned order is illegal and void ab-initio besides being against the principles of natural justice.
- B. That the impugned order is void being without jurisdiction, as respondent No 4 is not the competent authority, as both are serving in the same scale.
- C. That the impugned order is based on malice as the appellant was never provided opportunity to defend himself.
- D. That no charge sheet and show cause notice was ever communicated to the appellant and thus condemned unheard.
- E. That no inquiry was conducted in the matter to have found out the true facts and circumstances.
- F. That the appellant was not afforded opportunity of personal hearing.
- G. That the appellant never absented from duty and he was present on 07-08-2018, as he and one Dr Farman examined more than 100 patients on the same very day, as evident from the duty rota of the day. **(Copy of duty Rota is enclosed as Annexure D).**
- H. That the appellant has about 30 years of service with unblemished service record.
- I. That the appellant seeks the permission of this honorable Tribunal for further/additional grounds at the time of arguments.

It is therefore prayed, that appeal of the appellant, may kindly be accepted as prayed for.

Dated: 15-02-2019

Through

Appellant

**Fazal Shah Mohmand
Advocate, Peshawar**

- 3 -

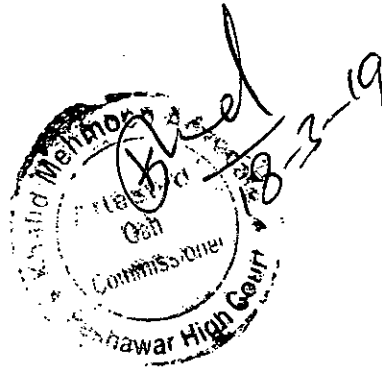
AFFIDAVIT

I, Dr. Khalil Ur Rehman, Principal Medical Officer, District Headquarter Hospital, Mardan, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by


Fazal Shah Mohmand
Advocate Peshawar


DEPONENT


Peshawar High Court
Commissioner
28-3-19

(Better Copy)
Annexure A
Government of Khyber Pakhtunkhwa
District Account Office Mardan
Monthly Salary Statement October, 2018

- 4/A -

Personal Information of Mr Khalil ur Rehman S/o Abdul Rehman
 Personal Number 00119822 CNIC 1610120221021 NTN
 Date of Birth 02/08/1960 Entry are Govt Service 29.08.19686 Govt of Khyber Pakh
 Designation PR158 IPAL MEDICAL OFFICER GOVERNMENT OF KHYBER PAKHTUNKHWA
 DDO Code MR1740-MS District Head Quarter Hospital Mardan.
 Payroll Section 002 GPT Section (01) Cash Cadet
 GPV A-C No. CIME000192 (sic) GPF Balance 1,776083.00
 Vender Number 30038108 KHALIL UR REHMAN
 Pay and Allowances Pay Wale BPS for 20_ Pay Scale

Wage Type	Amount	Wage Type	Amount
0001 Basic Pay	104,060	1000 Housing Rent Allowance	5,856.00
1210 Company Allowance 2005	5,000.00	1518 Entertainment Allowance	200.00
1947 Medical Allow BPS (16-22)	5076.00	1085 Health Professional Allow	62,000.00
2148 (15& Adhoc Relief AII-2013	2,425.00	2199 Adhoc Relief Allow @10%	1614.00
2211 Adhoc Relief AII 2016 10%	8,521.00	2124 Adhoc Relilef All 2017 @10%	10,496.00
2247 Adhoc Relief AII 2018 10	10,496.00		

Deduction General

Wage Type	Amount	Wage Type	Amount
2019 GPS Subscription	7,180.00	1901 Benevolent Fund	400.00
1609 Income Tax	6,910.00	4004 Benefits & Comp	1,600.00
1801 Ad Basic Pay	7,310.00		

Deductions Loans and Advances

Loan	Description	Principal Amount	Deduction	Balance

Deductions Income Tax

Payable 83,163.70 Recovered III October-2018 27,886.00 Exempted 0.10 Recoverable 15,278.00

Gross Pay (Rs) 219,914.00 Deductions (Rs): 23,826.00 Net Pay (Rs) 196,094.00

Payee Name KHALIL UR REHMAN

Account Number 23677000136903

Bank Details Habib Bank Limited, 232367 College Chowk, Dr. Mardan College Dr.Mardan MARDAN

Leaves: Opening Balance Availed Earned Balance

PERMANENT ADDRESS: VILLAGE & POST OFFICE MALAKAND AGENCY

City: Mardan Domicile NW-Khyber Pakhtunkhwa Housing Status No. Official

Temp Address:

City Email drkrohman230@gmail.com

Attested


(Better Copy)

- 4/B -

Medical Superintendent

D.II Q Hospital Mardan

Copy forwarded to the

Director, Independent Monitoring Unit Health Peshawar (H # 5-A Park Road,
University Town for information.

Divisional Monitoring Officer IMU Health, Mardan Division with reference to his
Accountant / BIII Clerk with the director to deduct one day Pay from the above
named Officer / Official on account of absence from duty.

Medical Superintendent

D.II Q Hospital Mardan

Attested
EJG

B

"B"
-5-

OFFICE OF THE MEDICAL SUPERINTENDENT

DISTRICT HEADQUARTERS HOSPITAL MARDAN

Ph # 0937-9730145 Fax # 9730276

No. /MS/PA Dated Mardan the 15/09/2018

OFFICE ORDER

As reported by the Divisional Monitoring Officer Independent Monitoring Unit Health Mardan Division vide No. IMU/Health-2018-19/28 I/MO Mardan monthly report August dated 08/09/2018

The following staff were noted absent on the dates mentioned against each name for which one day salary is hereby deducted as punishment

S. No.	Name and Designation	Date of Absence
1	Dr. Khalil, MO Orthopedic unit	07/08/2018
2	Dr. Huma Jabeen, Dental Surgeon	-do-
3	Dr. Talat, MO	-do-
4	Dr. Nargis, WMO	-do-
5	Dr. Samia Saeed, WMO	18/08/2018
6	Mrs. Akhtar Begum, Charge Nurse	-do-
7	Mrs. Ruhina Shaibar, Charge Nurse	-do-
8	Mr. Afghani, Clinical Technician	-do-
9	Mr. Talak Naz, Clinical Technician Radiology	-do-
10	Mr. Farhad, Sweeper	07/08/2018
11	Mr. Saad Umar, CT Radiology	18/08/2018
12	Mr. Kifayat Jan, ACPO ECG	-do-
13	Mr. Imran Waleed, Sweeper	07/08/2018
14	Mr. Javed, Sweeper	-do-
15	Mr. Shahzad, Sweeper	-do-
16	Mrs. Shamsi Lal Dai	-do-

S.L.
Medical Superintendent,
D.H.Q. Hospital, Mardan

10/09/2018 IMS/PA

Copy forwarded to the
Director, Independent Monitoring Unit Health Peshawar (H # 5-A, Park Road
University Town for information
Divisional Monitoring Officer IMU Health, Mardan Division with reference to his
letter No. referred to above for information
Accountant / Bill Clerk with the direction to deduct one day Pay from the above
named Officer / Official on account of absence from duty

[Signature]
Medical Superintendent
D.H.Q. Hospital, Mardan

Attended
[Signature]

(Better Copy)

- 5/A -

Annexure B

OFFICE OF THE MEDICAL SUPERINTENDENT
DISTRICT HEADQUARTERS HOSPITAL MARDAN

Ph # 0937-9230145 Fax # 923022

No. /MS/PA dated Mardan the 15.09/2018

OFFICE ORDER

As reported by the Divisional Monitoring Officer
Independent Monitoring and Health, Mardan, Division vide No. IMU/Health-
2018-19/28 DMO, Mardan monthly.

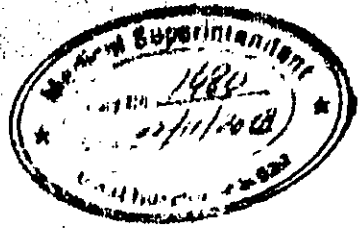
The following staff were noted absent on the dates
mentioned against each name for which one day salary is hereby deducted as
punishment.

S. No.	Name and Designation	Date of Absence
1.	Dr. Khalil MO Orthopedic unit	07.08.2018
2.	Huma Jabeen Dental Surgeon	-do-
3.	Dr. Tufail M.O	-do-
4.	Dr. Nargis WMO	-do-
5.	Dr. Samia Saeed WMO	18.08.2018
6.	Mrs. Akhtar Begum Charge Nurse	-do-
7.	Mrs. Rubina Shaibar Charge Nurs	-do-
8.	Mr. Afghan Clinical Technician	-do-
9.	Mr. Talak Naz Clinical Technicia	-do-
10.	Mr. Farhad Sweepe	07.08.2018
11.	Mr. Said Umar CT Radiology	18.08.2018
12.	Mr. Kifayat Jan ACPO ECG	-do-
13.	Mr. Imran Waleed, Sweeper	07.08.2018
14.	Mr. Javed, Sweeper	-do-
15.	Mr. Shahzad Sweeper	-do-
16.	M/s Shamsi Lal Dal	-do-

Attested
ed

"C"

-6-



The Medical Superintendent
DHO Hospital Mardan.

Subject: 01 DAY Salary Deduction.

Respected Sir,

With due respect being Principal Medical Officer (Ortho) of DHO Hospital Mardan submit to your kind office that after receiving and observing my pay-slip I came to know that ONE day salary has been deducted in the month of AUGUST. I would respectfully state that this act actively defies the norms of Professional Ethics. On August 27 the Independent Monitoring Unit personnel who marked my absentee didn't notice that I was the duty Medical Officer on-duty in OPD which is clearly evident by the duty Rota of the Orthopedic Unit and also from the OPD Register. Moreover, I and Dr. Farman examined more than 100 Patients the same day of which the salary has been deducted without any prior explanation from your good office.

Kindly probe into the matter & conduct a proper enquiry about this mishap in order to devise a suitable solution

Thank you!

Dated: 14/8/2018

Principal Medical Officer

Dr. Khalil Ur Rehman

Signature:

*Dr. Khalil was present
at Rot day & examined*

(Better Copy)

Annexure C

- 6/A -

The Medical Superintendent
DHQ Hospital Mardan

Subject: 01 DAY Salary Deduction

Respected Sir,

With due respect being Principal Medical Officer Ortho of DHQ Hospital Mardan submit to your kind office that after receiving and observing my pay I came to know that ONE day salary has been deducted in the month of AUGUST. I would respectfully state that his act actively defies the norms of Professional Ethics. On August 17th the independent Monitoring Unit personnel who marked my absentee didn't notice that I was the only Medical Officer on day in OPD which is clearly evident by the duty Rota of the Orthopedic Unit and also from the OPD register, Moreover I and Dr. Farman examined more than 100 Patients the same day of which the salary has been deducted without any prior explanation from your good office.

Kindly probe into the matter & conduct a proper enquiry about this mishap in order to devise a suitable solution.

Thank You

Dated 02/11/2018

Principal Medical Officer
Dr. Khalil ur Rehman

Signature _____

Attested
[Signature]

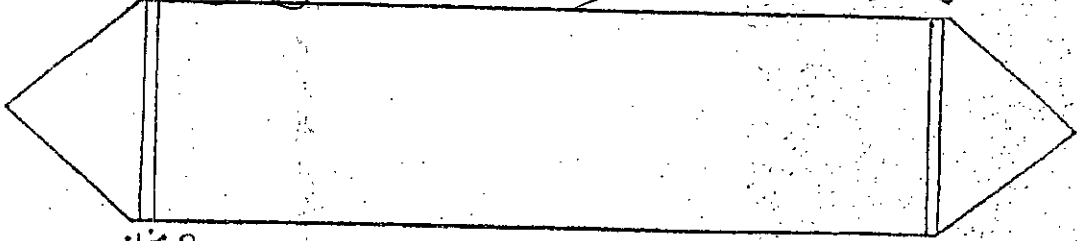
the month of 7 - 8 308

7 - "D" B.

No.	Name	Value	No.	Name	Value	REMARKS
1	Mulhan	261	80	Mulhan	261	
2	Mulhan	271	81	Mulhan	271	
3	Mulhan	281	82	Mulhan	281	
4	Mulhan	291	83	Mulhan	291	
5	Mulhan	301	84	Mulhan	301	
6	Mulhan	311	85	Mulhan	311	
7	Mulhan	321	86	Mulhan	321	
8	Mulhan	331	87	Mulhan	331	
9	Mulhan	341	88	Mulhan	341	
10	Mulhan	351	89	Mulhan	351	
11	Mulhan	361	90	Mulhan	361	
12	Mulhan	371	91	Mulhan	371	
13	Mulhan	381	92	Mulhan	381	
14	Mulhan	391	93	Mulhan	391	
15	Mulhan	401	94	Mulhan	401	
16	Mulhan	411	95	Mulhan	411	
17	Mulhan	421	96	Mulhan	421	
18	Mulhan	431	97	Mulhan	431	
19	Mulhan	441	98	Mulhan	441	
20	Mulhan	451	99	Mulhan	451	
21	Mulhan	461	100	Mulhan	461	
22	Mulhan	471				
23	Mulhan	481				
24	Mulhan	491				
25	Mulhan	501				
26	Mulhan	511				
27	Mulhan	521				
28	Mulhan	531				
29	Mulhan	541				
30	Mulhan	551				
31	Mulhan	561				
32	Mulhan	571				
33	Mulhan	581				
34	Mulhan	591				
35	Mulhan	601				
36	Mulhan	611				
37	Mulhan	621				
38	Mulhan	631				
39	Mulhan	641				
40	Mulhan	651				
41	Mulhan	661				
42	Mulhan	671				
43	Mulhan	681				
44	Mulhan	691				
45	Mulhan	701				
46	Mulhan	711				
47	Mulhan	721				
48	Mulhan	731				
49	Mulhan	741				
50	Mulhan	751				
51	Mulhan	761				
52	Mulhan	771				
53	Mulhan	781				
54	Mulhan	791				
55	Mulhan	801				
56	Mulhan	811				
57	Mulhan	821				
58	Mulhan	831				
59	Mulhan	841				
60	Mulhan	851				
61	Mulhan	861				
62	Mulhan	871				
63	Mulhan	881				
64	Mulhan	891				
65	Mulhan	901				
66	Mulhan	911				
67	Mulhan	921				
68	Mulhan	931				
69	Mulhan	941				
70	Mulhan	951				
71	Mulhan	961				
72	Mulhan	971				
73	Mulhan	981				
74	Mulhan	991				
75	Mulhan	1001				

Attested
[Signature]

بیدالت مدروس لٹریچر



2^{مہ مہ} ڈاکٹر دھلیپہ ایچ ایم لورینٹ و سترہ

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دیکھ کر کارروائی متعلقہ ASL اور البتہ صاف ایرہ و کریمہ

آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز دیکھ صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق و زرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا کی طرف یا اپیل کی برادگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم _____ ماہ _____ سنہ 2014
_____ کے لئے منظور ہے۔
Accepted
Accepted

In the KP Service Tribunal, Peshawar.

Dr. Khalil-ur-Rahman v/s Health:


Application For Extension in the
Submission of Security Process fee.

Respectfully Sheweth;

- 1) That, the above titled appeal is pending adjudication before this Honourable Tribunal.
- 2) That, on the previous date the case was admitted but due unavoidable circumstances the security process fee's was not submitted.

It is, therefore, most humbly request the extension may kindly be granted for submission of security process fee.

20th May, 2019.

Appellant
Through 
Fazal Shah Mohammad
ASC, Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

Appeal NO. 372/19

APPELLANT

Dr. Khalil Ur Rehman
Principal Medical Officer
DHQ Hospital Mardan.

VERSUS

RESPONDENTS

Government of Khyber Pakhtunkhwa
& Others

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S#	Description of Document	Annexure	Pages
01.	Para wise Comments on behalf of Respondent No.4		1-2
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03.	Finance Deptt. KPK Notification	A	4
04.	Director General Health Officer KPK	B	5
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07.	IMU Report for the Month of Oct-2018	E	14-19
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Medical Superintendent,
DHQ Hospital Mardan

Appeal NO. 372/2019

Dr. Khalil Ur Rehman Principal Medical Officer, District Head Quarter Hospital Mardan

.....Appellant.

VERSUS

- 01. Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Peshawar.**
- 02. Secretary Health Department, Government of Khyber Pakhtunkhwa Peshawar.**
- 03. Director General Health Services Khyber Pakhtunkhwa Peshawar.**
- 04. Dr. Abdul Latif, Medical Superintendent, DHQ Hospital Mardan.**

Written Statement on behalf of Res No. 04.....Respondents.

Preliminary Objections: -

01. That the Appeal is incompetent & is not maintainable in its present form.
02. That the Appellant is stopped by its own conduct to bring the present appeal.
03. That the Appellant has got no cause of action.
04. That the Appellant has no local stand.
05. That the Appeal is bad for misjoinder & non-Joinder for necessary party.
06. That the Appeal is hit by laches.

Para wise comments on behalf of respondent No. 01 & 03.

FACTS.

01. Pertained to record.
02. Pertained to record.
03. No Comments.
04. Incorrect.

GROUND.

- A. Incorrect, order have been done as per rules & regulation of the Department, Copy of the Office Order attached. (**Annexure – “A”**).
- B. Incorrect, deductions have been done as per recommendation of IMU report and after communication with competent authority i.e Director General Health. Copy of the office order No. 20477, dated 19-12-2018 attached. (**Annexure-“B”**).
- C. Incorrect, explanation has been called vide office order No. 12362-71, dated 12-11-2018. (**Annexure-“C”**).

D. Incorrect, Explained earlier in **Para "C"**.

E. Incorrect. (Copy of the IMU report for the month of August 2018 and October 2018 is attached as facts. (**Annexure-"D & E"**)).

F. Incorrect, Explained earlier in **Para "C"**.

G. Incorrect, the Appellant was found absent from duty on 07-08-2018. Copy of the IMU report attached. Similarly he was also a late comer on 06-10-2018. Copy of the IMU report attached.

H. Pertained to record.

I. No Comments.

It is, therefore requested that the writ Petition of appellant may kindly be dismissed with Cost.


**Medical Superintendent,
DHQ Hospital Mardan.**
R

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No. 372/19

APPELLANT

RESPONDENTS

Dr. Khalil Ur Rehman
Principal Medical Officer
DHQ Mardan

VERSUS

Government of Khyber Pakhtunkhwa
& Others

AFFIDAVIT

It is certified that I Dr. Muhammad Asif Litigation Officer, DHQ Hospital Mardan, do hereby solemnly affirm & declared that contents of Para wise comments in the Appeal No. 372/2019 Dr. Khalil Ur Rehman Principal Medical Officer DHQ Hospital Mardan are true & correct to the best of my knowledge & nothing has been concealed from the honorable court.

DEPENDENT



Dr. Muhammad Asif
Litigation Officer
DHQ Hospital Mardan

CNIC No. 37405-5098366-7



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

No. 80(FR)/FD/5-14/2014
Dated Peshawar, the 10-12-2014

- To,
1. Additional Chief Secretary, Khyber Pakhtunkhwa
 2. Senior Member Board of Revenue, Khyber Pakhtunkhwa.
 3. All Administrative Secretaries, Govt. of Khyber Pakhtunkhwa


Subject - DEDUCTION OF SALARY FROM GOVT. EMPLOYEES IN CASE OF ABSENTEESM

Dear Sir,

I am directed to refer to the subject noted above and to state that it has come to the notice of the government that on some occasion government employees remain absent from duty without authorization or fail to perform their assigned duties. Such instances attract the provision of Fundamental Rules and Khyber Pakhtunkhwa Government servant (Efficiency and Disciplinary) Rules 2011. Accordingly, such government employees loses right to payment of pay and allowances for such periods besides making themselves liable for disciplinary proceedings. All concerned offices are duty bound to deduct pay and allowances of the defaulting government employees for the period of absence and non performance of the duty.

I am further directed to convey that all Administrative Departments and their attached entities shall ensure implementation of the above legal provisions in letter & spirit.

Attested
 D/S Medical Superintendent
 D.H.Q. Hospital Mardan

Yours faithfully,

 (SHAUKAT ULLAH)
 SECTION OFFICER (FR)

Copy is forwarded to that :

- Principal Secretary to Governor, Khyber Pakhtunkhwa.
- Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- P.O. to Chief Secretary to Government of Khyber Pakhtunkhwa



Procedure - B 0.5

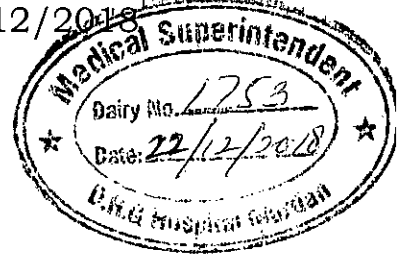
DIRECTORATE GENERAL HEALTH SERVICES

KHYBER PAKHTUNKHWA PESHAWAR

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name
Office Ph t 091 - 9210269 Exchange ☎ 091 - 9210187, Fax ☎ 091 - 9210230

No. *20477* /E.I

Dated: *19/12/2018*



To

Medical Superintendent,
DHQ Hospital Mardan.

Subject: - ILLEGAL 01-DAY SALARY DEDUCTION VIA IMU REPORT & MISINTERPRETATION BY MS.

I am directed to refer to the subject noted above and to enclose herewith a copy of application alongwith its enclosures in respect of Dr. Khalil-Ur-Rahman PMO DHQ Hospital Mardan which is self-explanatory with the remarks to look into the matter and decide it at your own level.

[Signature]
19/12/18
DEPUTY DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

[Signature]
Dy Medical Superintendent
D.H.Q. Hospital Mardan



OFFICE OF THE MEDICAL SUPERINTENDENT

DISTRICT HEADQUARTERS HOSPITAL MARDAN

Ph # 0937-9230145 Fax # 9230226

No. 1236271 / 1

Dated 12/11 / 2018

To

1. Dr. Farmanullah Orth: Surgeon on 06.10.2018.
2. Dr. Khalil-ur-Rehman SMO on 06.10.2018.
3. Dr. Sajid SMO on 06.10.2018.
4. Dr. Mian Tauseef-ud-Din Surgeon on 06.10.2018.
5. Dr. Muhammad Arif Physician on 06.10.2018.
6. Dr. Asmat Askar Gynaecologist on 06.10.2018 & 30.10.2018.
7. Dr. Syed Muhammad Tariq Children Specialist on 30.10.2018.
8. Dr. Syed Ashfaq Ali Psychiatrist on
9. Dr. Nuzhat Jehangir SMO on 17.10.2018.
10. Mr. Maqsood Class-IV on 14.10.2018.

SUBJECT:- **LATE COMER**

Memo:

As reported by the Divisional Monitoring Officer Independent Monitoring Unit Health Mardan Division vide his letter No. IMU/Health/2018-19/38 DMO, Mardan, Monthly report October-2018 dated 06.11.2018, during his visit of this hospital you were found late comer for duty on the above mentioned dates which created problems to the hospital administration as well as public.


You all are directed to explain your position within 02 days positively for onward submission.


Medical Superintendent
DHQ: Hospital Mardan

No. 12372-73 / 1

Copy forwarded to :-

1. Director IMU Health Peshawar (House # 5-A, Park Road, University Town Peshawar) for information with reference quoted above.
2. Divisional Monitoring Officer Independent Monitoring Unit Health Mardan Division for information with reference quoted above.


Dy. Medical Superintendent
D.H.Q. Hospital Mardan


Medical Superintendent
DHQ: Hospital Mardan

Annexure - D
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
INDEPENDENT MONITORING UNIT

IMU/Health 2018-19/28 DMO, Mardan, Monthly Report *August*
Dated: ~~Sept~~ 8, 2018

District Health Officer, Mardan
Medical Superintendent, DHQ Mardan

Subject: Monthly Report based on visit of IMU to Healthcare Facilities

Please find enclosed herewith monthly report based on visits of Independent Monitoring Unit in the month of *August* 2018 for further necessary action please.

Tauqeer Iftikhar
Tauqeer Iftikhar
Divisional Monitoring Officer

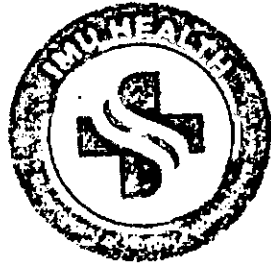
CC:

1. Director IMU Headquarter Peshawar
2. Deputy Commissioner Mardan

A. R. Khan
Dy. Medical Superintendent
G.B.Q. Hospital Mardan

Lal Mir

[Signature]

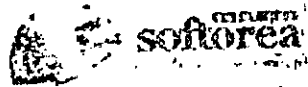
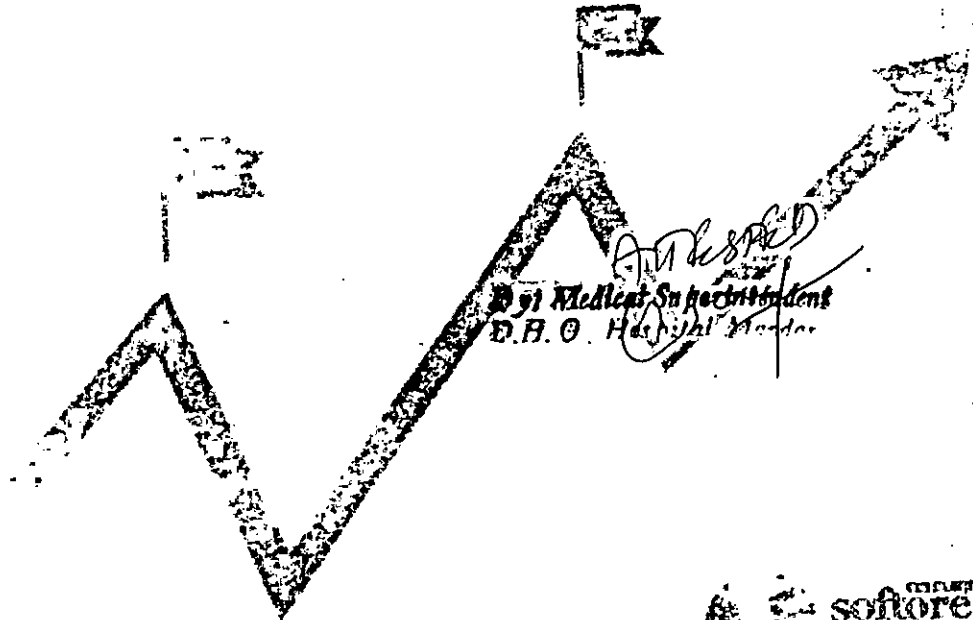


HEALTH DATA PACKS

August 2018

MARDAN

Secondary



State Performance Summary

This page summarizes the performance of your district on key performance indicators

Total visits to Secondary Health Care Facilities (SHCFs)	21
Number of SHCFs visited at least once	7
SHCFs found illegally occupied	1

Performance on Key Indicators

Health Staff	Current	Target
Vacant Nurses	17	=<2
Vacant MOs	9	=<3
Vacant MTs	3	=<5
Vacant SMO	14	=<5

Equipment Not Available or Non-Functional

The table below shows the status of equipment in Secondary Health Care Facilities. 'X' shows that the equipment is non-functional.

Facility Name	Equipment Name	Availability	Functionality
Type-D Hospital Katlang	Centrifuge	YES	No
Type-D Hospital Katlang	Digital Photo Calorimeter	YES	No
Type-D Hospital Katlang	High Precision Water Bath	YES	No
Type-D Hospital Katlang	Centrifuge	YES	No
Type-D Hospital Katlang	Digital Photo Calorimeter	YES	No
Type-D Hospital Katlang	High Precision Water Bath	YES	No
Type-D Hospital Katlang	Mobile Ot Light With Battery	YES	No
Type-D Hospital Katlang	Oxygen Cylinder With Trolley Stand	YES	No
Type-D Hospital Shahbaz Garhi	Auto Developer	YES	No

Medical Superintendent
D.H.Q. Hospital Katlang
(Signature)

Type-D Hospital Shahbaz Garhi	Auto Fixer	YES	No
Type-D Hospital Shahbaz Garhi	Auto Developer	YES	No
Type-D Hospital Shahbaz Garhi	Auto Fixer	YES	No
Type-D Hospital Shahbaz Garhi	Auto Developer	YES	No
Type-D Hospital Shahbaz Garhi	Auto Fixer	YES	No
Type-D Hospital Shahbaz Garhi	Centrifuge	YES	No
Type-D Hospital Toru	Digital Spectrophotometer	YES	No
Type-D Hospital Toru	Centrifuge	YES	No
Type-D Hospital Toru	Digital Spectrophotometer	YES	No
Type-D Hospital Toru	Defibrillator With Ecg Monitor	YES	No
Type-D Hospital Toru	Ecg Machines	YES	No
Type-D Hospital Toru	Ecg Machines	YES	No
Type-D Hospital Toru	Dental X-Ray Unit	YES	No
Type-D Hospital Toru	Dental X-Ray Unit	YES	No
THQ Takht Bhai	Ph Meter	YES	No
THQ Takht Bhai	Ph Meter	YES	No
THQ Takht Bhai	Radiant Warmer	YES	No
THQ Takht Bhai	Vacum Extractor	YES	No
THQ Takht Bhai	Radiant Warmer	YES	No
THQ Takht Bhai	Vacum Extractor	YES	No
THQ Takht Bhai	Dental X-Ray Unit	YES	No
THQ Takht Bhai	Dental X-Ray Unit	YES	No

ADMITTED
 D. H. Q. Medical Superintendent
 D.H.Q. Hospital

Vacant Staff Details

The table below shows the status of Vacant positions of Specialists, MOs, MTs and Nurses. The NULL value shows that the DCA couldn't ascertain the status of vacant positions at the facility.

Facility Name	Vacant Medical Specialist	Vacant Medical Officer	Vacant Medical Technician	Vacant Nurses
Civil Hospital Lund Khwar	4	9	1	5
DHQ Hospital Mardan	10	0	6	5
HIQ Takht Bhai	0	0	1	0
Type-D Hospital Toru	1	2	0	0
Type-D Hospital Katlang	3	0	0	0
Type-D Hospital Shahbaz Garhi	3	1	0	4

Staff Absence

This page lists details of staff found absent during DCA visit.

Name	Monitoring Date	Name	Designation	Attendance Detail
DHQ Hospital Mardan	8/7/2018 12:26	Dr Khalil (orthopedic)	MO	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Farhad	Sweeper	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Huma Jabeen	Dental Surgeon	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Imran Waleed	Ward Orderly	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Javid	Sweeper	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Mukamil Khan	Malaria Supervisor	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Nargis	WMO	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Shamsi Lal	Dai	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Shehzad	Sweeper	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/7/2018 12:26	✓ Tufail	MO	Un-Authorized Absent ✓
DHQ Hospital Mardan	8/18/2018	✓ Akhtar Begum	Nurse	Un-Authorized ✓

Dr. Khalil
D.H.Q. Hospital Mardan

DHQ Hospital Mardan	6:50	✓ Falak Niaz	JCT X-ray	Absent	
DHQ Hospital Mardan	8/18/2018	✓ Hakeem Khan	Nurse	Un-Authorized	✓
DHQ Hospital Mardan	6:50	✓ Kifayat Jan	Ac. Plast. D... (ECG)	Absent	✓
DHQ Hospital Mardan	8/18/2018	✓ Robina Shaiber	Nurse	Un-Authorized	✓
DHQ Hospital Mardan	6:50	✓ Said Umar	JCT X-ray	Absent	✓
DHQ Hospital Mardan	8/18/2018	✓ Samina Naz	Nurse	Late Comer	
DHQ Hospital Mardan	6:50	✓ Samia Saeed	WMO	Un-Authorized	✓
DHQ Hospital Mardan	8/18/2018	✓ Taj Muhammad	JCT X-ray	Absent	
DHQ Hospital Mardan	6:50	✓ Afghan	OTA	Late Comer	✓
DHQ Hospital Mardan	8/29/2018	✓ Syed Ashfaq Ali	Specialist Doctor	Absent	
Type-D Hopsital Toru	8/31/2018	izzat nisar	MO	Un-Authorized	
Type-D Hopsital Toru	10:12	Muhammad Shoab	MO	Absent	
Type-D Hopsital Toru	8/7/2018	Nazzia jaffar	WMO	Un-Authorized	
Type-D Hopsital Toru	10:12	Seema Naz	WMO	Absent	
Type-D Hopsital Toru	8/7/2018	Seema Naz	WMO	Un-Authorized	
Type-D Hopsital Toru	10:12	Seema Naz	WMO	Absent	
Type-D Hopsital Toru	8/16/2018	Seema Naz	WMO	Un-Authorized	
Type-D Hopsital Toru	8:43	Samina Azra	Nurse	Absent	
Type-D Hospital Katlang	8/18/2018	Shakeela	Nurse	Un-Authorized	
Type-D Hospital Katlang	8:31	Anmol Farid	JCT Dental	Absent	
Type-D Hospital Shahbaz Garhi	8/11/2018	Aysha	WMO	Un-Authorized	
Type-D Hospital Shahbaz Garhi	9:12	Falak Naz	Dai	Absent	
Type-D Hospital Shahbaz Garhi	8/11/2018	Gul Rukh	WMO	Un-Authorized	
Type-D Hospital Shahbaz Garhi	9:12	Jamal Khan	JCT Dental	Absent	
Type-D Hospital Shahbaz Garhi	8/11/2018			Un-Authorized	
Type-D Hospital Shahbaz Garhi	9:12			Absent	

[Signature]
D.H.Q. Hospital Mardan

13

MARDAN

pe-D Hospital ahbaz Garhi	8/11/2018 9:12	Nazir Khan	Store Keeper	Un-Authorized Absent
pe-D Hospital ahbaz Garhi	8/11/2018 9:12	Rukhsana	Nurse	Un-Authorized Absent
pe-D Hospital ahbaz Garhi	8/11/2018 9:12	Sadia Rashid	Gynaecologist	Un-Authorized Absent
pe-D Hospital ahbaz Garhi	8/11/2018 9:12	Said Ul Wara	Dai	Un-Authorized Absent
pe-D Hospital ahbaz Garhi	8/11/2018 9:12	Saidul Wara	Dai	Un-Authorized Absent

Amir S. Khan
Dy. Medical Superintendent
D.H.Q. Hospital Mardan

Anam E -14
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT
INDEPENDENT MONITORING UNIT

IMU/Health 2018-19/38 DMO, Mardan, Monthly Report October
Dated: November 6, 2018

District Health Officer, Mardan
Medical Superintendent, DHQ Mardan

Subject: Monthly Report based on visit of IMU to Healthcare Facilities

Please find enclosed herewith monthly report based on visits of Independent Monitoring Unit in the month of October 2018 for further necessary action please.

Tauqeer Iftikhar

Tauqeer Iftikhar
Divisional Monitoring Officer

CC:

1. Director IMU Headquarter Peshawar
2. Deputy Commissioner Mardan

M. S. Khan
D. H. Q. Hospital Mardan

Lat. Mir
[Signature]
11/20/18

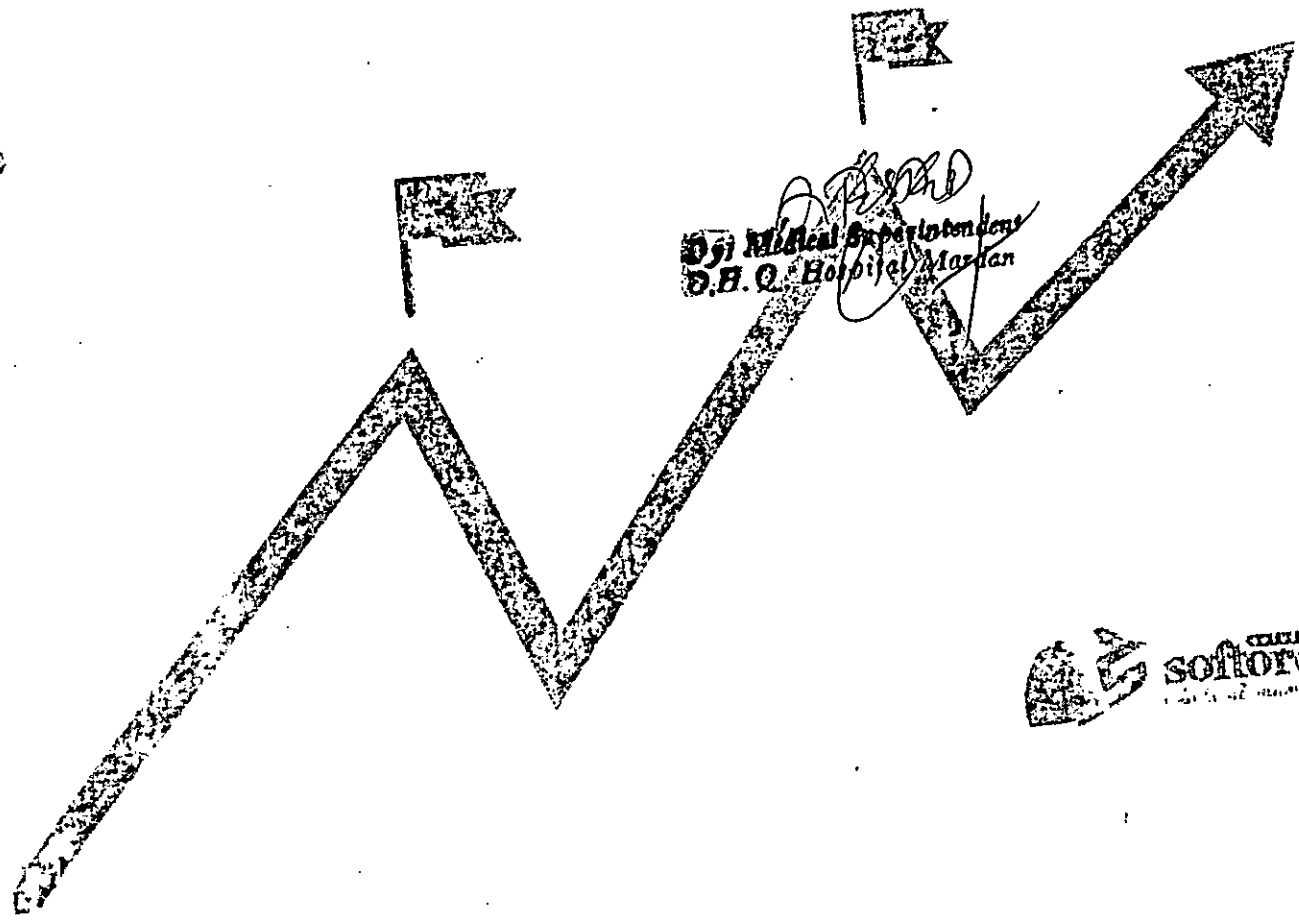


IMU HEALTH DATA PACKS

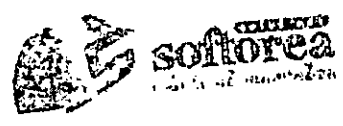
October 2018

MARDAN

Secondary



[Signature]
Dji Medical Superintendent
D.H.Q. Hospital Marjan



Performance Summary

This summarizes the performance of your district on key performance indicators

Attends to Secondary Health Care Facilities (SHCFs)	21
Number of SHCFs visited at least once	8
Number found illegally occupied	0

Performance on Key Indicators

Health Staff	Current	Target
Assistant Nurses	5	=<2
Assistant MOs	0	=<3
Assistant MTs	6	=<5
Assistant SMO	8	=<5

Utilities Not Available or Non-Functional

The table below shows current status of utilities in Secondary Health Care Facilities. 'x' shows that the utility is not functional / available in the facility

Facility Name	Electricity	Drinking Water	Toilet Facility
Type-D Hospital Toru	YES	NO	YES
Type-D Hospital Shahbaz Garhi	YES	NO	NO

Equipment Not Available or Non-Functional

The table below shows the status of equipment in Secondary Health Care Facilities. 'X' shows that the equipment is non-functional.

Facility Name	Equipment Name	Availability	Functionality
THQ Takht Bhai	Water Bath (L.E-05)	YES	No
Type-D Hospital Katlang	Serological Water Bath	YES	No
Type-D Hospital Katlang	Ambu Bags	YES	No

(Signature)
 D.B. Q. Medical Superintendent
 D.B. Q. Hospital, Mirpur

Vacant Staff Details

The table below shows the status of Vacant positions of Specialists, MOs, MTs and Nurses. The NULL value shows that the DCA couldn't ascertain the status of vacant positions at the facility.

Facility Name	Vacant Medical Specialist	Vacant Medical Officer	Vacant Medical Technician	Vacant Nurses
Civil Hospital Lund Khwar	0	10	0	4
DHQ Hospital Mardan	10	0	6	5
Type-D Hospital Toru	1	0	0	0
Type-D Hospital Katlang	3	0	0	0
Type-D Hospital Rustam	3	3	0	0
Type-D Hospital Shahbaz Garhi	4	2	0	0

Staff Absence

This page lists details of staff found absent during DCA visit.

Facility Name	Monitor Date	Name	Designation	Attendance Detail
HQ Hospital Mardan	6-Oct-18	Ajmal	MT	Un-Authorized Absent
HQ Hospital Mardan	6-Oct-18	Dr Farman ✓	Specialist Doctor	Late Comer ✓
HQ Hospital Mardan	6-Oct-18	Dr Khalil ✓	SMO	Late Comer ✓
HQ Hospital Mardan	6-Oct-18	Dr Sajid ✓	MO	Late Comer ✓
HQ Hospital Mardan	6-Oct-18	Amin Khan	PMO	Casual Leave
HQ Hospital Mardan	6-Oct-18	Mian Tauseefuddin ✓	Specialist Doctor	Late Comer ✓
HQ Hospital Mardan	6-Oct-18	Muhammad Arif ✓	Specialist	Late Comer ✓
HQ Hospital Mardan	6-Oct-18	Misbah ✓	Specialist	Casual Leave
HQ Hospital Mardan	6-Oct-18	Asmat Askar ✓	Gynaecologis	Late Comer ✓
HQ Hospital Mardan	6-Oct-18	Abdul Qayum	Ward orderly	Casual Leave
HQ Hospital Mardan	14-Oct-18	Hakeem Khan	Nurse	Un-Authorized Absent

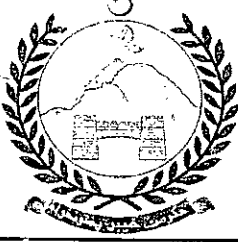
MARDAN				
DHQ Hospital Mardan	14-Oct-18	Maqsood	Class I-IV	Late Comer ✓
DHQ Hospital Mardan	15-Oct-18	Hakim Khan	JCT Surgical	Un-Authorized Absent
DHQ Hospital Mardan	17-Oct-18	Ajmal	MT	Un-Authorized Absent
DHQ Hospital Mardan	17-Oct-18	Nuzhat Jehangir	SMO	Late Comer ✓
DHQ Hospital Mardan	30-Oct-18	Dr ismat	Gynaecologis t	Late Comer ✓
DHQ Hospital Mardan	30-Oct-18	Dr Tariq	Specialist Doctor	Late Comer ✓
DHQ Hospital Mardan	30-Oct-18	Syed Ashfaq Ali	Specialist Doctor	Late Comer ✓
Takht Bhai	8-Oct-18	Abid Ali ✗	MT	✗ Un-Authorized Absent
Takht Bhai	8-Oct-18	Dr Javid Iqbal	CMO	Un-Authorized Absent
Takht Bhai	8-Oct-18	Khalid Khan	MT	Un-Authorized Absent
D Hopsital Toru	31-Oct-18	Sumbal Bahar	Nurse	General Duty
D Hopsital Toru	10-Oct-18	Muhammad Azam	PMO	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Shah Rukh Farid	Gynaecologis t	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Abdur Rehman Khilji	Specialist	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Abdul Sabooh	Jct (MP)	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Komal Jehan	Nurse	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Shaheen Miraj	LHV	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Muhammad Irfan (junior)	Lab Technician	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Abid Abbas	Lab Technician	Un-Authorized Absent
D Hopsital Toru	10-Oct-18	Abdul Razzaq	Lab Technician	Un-Authorized Absent
D Hospital	24-Oct-18	Azmat	JCT Surgical	Un-Authorized Absent

D.H. Q. Mardan

D Hospital az Garhi	27-Oct-18	Dr Aurangzeb	MS	Late Comer
D Hospital az Garhi	27-Oct-18	Fayaz Ali	EPI Technician	Late Comer
D Hospital az Garhi	27-Oct-18	Muhammad Kausar	Lab Technician	Un-Authorized Absent
D Hospital az Garhi	27-Oct-18	Nasir Khan	JCT Anesthesia	Un-Authorized Absent
D Hospital az Garhi	27-Oct-18	Nayab Tabassum	Nurse	Late Comer
D Hospital az Garhi	27-Oct-18	Sadia Rashid	Gynaecologis t	Late Comer
D Hospital az Garhi	27-Oct-18	Syed Shah Fahad	MT	Late Comer
D Hospital az Garhi	27-Oct-18	Tauseef	Nurse	Late Comer

Attested
 Dr. Medical Superintendent
 D.H.Q. Hospital Mardan

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OFFICE OF THE MEDICAL SUPERINTENDENT
DISTRICT HEADQUARTERS HOSPITAL MARDAN
Ph # 0937-9230145 Fax # 9230226

AUTHORITY LETTER.

Dr. Muhammad Asif Litigation Officer & Mr. Amjad Ali Court Dealing Assistant to attend the Honourable Court of Service Tribunal Khyber Pakhtunkhwa Peshawar in case of Dr. Khalil-ur-Rehman Principal Medical Officer V/S Medical Superintendent D.H.Q. Hospital Mardan and others, Appeal No.372/2019 on 20.7.2019.

Medical Superintendent
DHQ: Hospital Mardan

No. 6618-25 / 1 Dated 12/7 /2019.

Copy forwarded to:-

1. Secretary to Govt: of Khyber Pakhtunkhwa Health Department Peshawar.
2. Additional Advocate General Khyber Pakhtunkhwa Services Tribunal Peshawar.
3. Registrar Khyber Pakhtunkhwa Services Tribunal Peshawar.
4. Director General Health Services Khyber Pakhtunkhwa Peshawar.
5. Dr. Muhammad Asif Litigation Officer D.H.Q. Hospital Mardan.
6. Mr. Amjad Ali Court Dealing assistant D.H.Q. Hospital Mardan.
7. Accountant D.H.Q. Hospital Mardan.
8. Head Driver.

for information & n/action.

Medical Superintendent
DHQ: Hospital Mardan



OFFICE OF THE MEDICAL SUPERINTENDENT
DISTRICT HEADQUARTERS HOSPITAL MARDAN
Ph.# 0937-9230145 Fax # 9230226

AUTHORITY LETTER.

Dr. Muhammad Asif Litigation Officer & Mr. Amjad Ali Court Dealing Assistant to attend the honorable court of service Tribunal Khyber Pakhtunkhwa, Peshawar in case of Dr. Khalil Ur Rehman Principal Medical Officer V/S Medical Superintendent DHQ Hospital Mardan & others, Appeal No.372/2019 on 28-08-2019.

No. 8252-59 /MS

Dated 17/08 /2019.

Medical Superintendent
DHQ Hospital Mardan.

Copy forwarded to:

01. Secretary Health Govt , Khyber Pakhtunkhwa Peshawar.
02. Additional Advocate General, Khyber Pakhtunkhwa Services Tribunal Peshawar.
03. Registrar Khyber Pakhtunkhwa Services Tribunal Peshawar.
04. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
05. Dr. Muhammad Asif Litigation Officer, DHQ Hospital Mardan.
06. Mr. Amjid Ali Court Dealing Assistant, DHQ Hospital Mardan.
07. Accountant DHQ Hospital Mardan.
08. Head Driver DHQ Hospital Mardan.

Medical Superintendent
DHQ Hospital Mardan

Handwritten initials: O/C