FORM OF ORDER SHEET

Court of

		Apr	peal No.	89/2024	•
	S.No.	Date of order proceedings	Order or other pro	oceedings with signature of judge .	
	1	2		3	-
					· · · · · · · · · · · · · · · · · · ·
	1-	05/01/2024 ~	Th	c_appeal of Mst. Najma Fi	rdous presented
	,		today by Mr.	Mohibullah Tarichvi Advocato	e. It is fixed for
			preliminary h	earing before Single Bench a	at Peshawar on
			. Par	cha Peshi is given to counsel fo	r the appellant.
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				By the order of Ch	nairman
	· r.				· .
			,	REGISTR	ΛR
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

Service Appeal No. <u>29</u> /2024						
Mst. Najma	(Appellant)					
		VERSUS	,	-		
Secretary	Health	Services,	Government	of	Khyber	
Pakhtunkh	wa and ot	hers		(Resp	ondents)	

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Appellant

Through

Dated: 05/01/2024

Muhibullah Tarichvi

LLM

Advocate High Court, Peshawar.

Cell No. 0345-3434235

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 29 /2024

Mst. Najma Firdous D/o Muhammad Suleman (RNO) (BS-16), District Headquarter Hospital, KDA, Kohat......(Appellant)

VERSUS

- 1. Secretary Health Services, Government of Khyber Pakhtunkhwa, Khyber Road, Peshawar.
- 2. Director General Health, Khyber Pakhtunkhwa, Warsak Road, Peshawar.
- 3. Medical Superintendent, District Headquarter Hospital, KDA, Kohat.....(Respondents)

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER DATED 03/10/2023 SERIAL NO. 1 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM THE DHQ HOSPITAL KOHAT TO SHAHEED FARID KHAN DHQ HOSPITAL HANGU AGAINST THE VACANT POST.

PRAYER:

On acceptance of the instant service appeal, the impugned transfer order dated 03/10/2023 of respondent No. 2 and reliving order dated 03/10/2023 may kindly be set aside and the



respondents No. 3 may kindly be directed to allow performing duty in DHQ Teaching Hospital KDA Kohat.

Any other remedy which this Hon'ble Tribunal deems fit that may also be awarded in favour of the appellant.

Respectfully Submitted:

- 1. That the appellant is the employee of the respondents department and performing her duties as Registered Nursing Officer (RNO) BS-16 DHQ Teaching Hospital KDA Kohat quite efficiently and to the entire satisfaction of her superiors and so far no complaint whatsoever made against the appellant.
- 2. That on the complain of the colleague staff about hostel accommodation respondent No. 3 through office order dated 28/03/2023 initiated a departmental inquiry committee to probe into the matter where after the inquiry committee submitted his final report. (Copy of office order and inquiry report are attached as annexure "A").

- issued transfer order dated 03/10/2023 of appellant on administrative grounds whereby the appellant has been transferred from DHQ Teaching Hospital KDA Kohat to Shaheed Farid Khan DHQ Hospital Hangu and respondent No. 3 relieved the appellant from the DHQ Teaching Hospital KDA Kohat. (Copies of both the impugned orders are attached as annexure "B" & "C").
- 4. That feeling aggrieved from impugned orders the appellant preferred departmental representation, which was no response till date. (Copy of representation is attached as annexure "D").
- 5. That the appellant aggrieved from the impugned transfer order and having no other remedy preferred the instant service appeal on the following grounds:

GROUNDS:

A. That the impugned transfer order dated 03/10/2023 tenable contrary to law and rule hence

not liable in the eyes of law and needs interference of this Hon'ble Tribunal to be set aside.

- B. That appellant has not been treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C. That the treatment meted out to the appellant is a violation of the fundamental rights of the appellant as enshrined in the Constitution of Islamic Republic of Pakistan, 1973.
- D. That both the impugned orders are also violative of Rule 12 of the Appointment, Promotion and Transfer Rules 1989.
- E. That the impugned order is against the zonal policy of health department.
- F. That the treatment of the respondents are malafide, malicious and discriminatory one.



G. That other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, respectfully prayed that on acceptance of the instant service appeal, the impugned transfer order dated 03/10/2023 of respondent No. 2 and reliving order dated 03/10/2023 may kindly be set aside and the respondent No. 3 may kindly be directed to allow performing duty in DHQ Teaching Hospital KDA Kohat in her previous position.

Any other remedy which this Hon'ble Tribunal deems fit that may also be awarded in favour of the appellant.

Appellant

Through

Dated: 05/01/2024

Muhibullah Tarichvi

Advocate High Court, Peshawar.

Cell No. 0345-3434235

(b)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No/2024					
Mst. Najma	Firdous .			(Appellant)	
		VERSUS			
Secretary	Health	Services,	Government	of Khyber	
Pakhtunkhy	wa and ot	hers		(Respondents)	

AFFIDAVIT

I, Mst. Najma Firdous D/o Muhammad Suleman (RNO) (BS-16), District Headquarter Hospital, KDA, Kohat, do hereby solemnly affirm and declare that all the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

CNIC: 14202-4239043-6 Cell No. 0334-8322832

$\overline{7}$

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No/2024						
Mst. Najma	a Firdous .			(Ap	pellant)	
		VERSUS	. · ·			
Secretary	Health	Services,	Government	of	Khyber	
Pakhtunkh	wa and ot	hers		(Resp	ondents)	

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Najma Firdous D/o Muhammad Suleman (RNO) (BS-16), District Headquarter Hospital, KDA, Kohat.

RESPONDENTS:

- 1. Secretary Health Services, Government of Khyber Pakhtunkhwa, Khyber Road, Peshawar.
- 2. Director General Health, Khyber Pakhtunkhwa, Warsak Road, Peshawar.
- 3. Medical Superintendent, District Headquarter Hospital, KDA, Kohat.

Appellant

Through

Dated: 05/01/2024

Muhibullah Tarichvi

Advocate High Court, Peshawar.



Anex ... L

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KDA; KOHAT

OFFICE ORDER

An enquiry committee comprising of the following members is: hereby constituted and directed to conduct the fact finding enquiry in to the complaint of Ms Rashida Begum (C/N) against Ms.Najma firdous (C/N) and submit the report along with recommendations within three days positively(copy of complaint attached).

1. Dr. Naeem Shah (DMS Estb/HR)

Chairman

2. Dr. Mussarat Ali (PMO/MLO)

Member

3. Dr. Syed Tahir All Shah (DMS Coordination)

Member

507 MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL **KOHAT**

No. 1) , 7

Dated Kohat the 2 2 /03/2023

Copy forwarded to the:-

- 1. Regional Director Health services (south) Khyber pakhtoon
- 2. Enquiry Committee for further necessary action.

3. All concerned for information.

DHQ TEACHING HOSPITAL



INOUIRY REPORT

With reference to the Medical Superintendent DHQ Teaching Hospital KDA Kohat Office No.1207/K-18 dated 28/03/2023.

After assessing Mst. Najma Firdous (Charge Nurse) personal file, Mst.Jamsheeda Ghafoor (Nursing Superintendent), Mr. Syed Nawaz (Nursing Supervisor – Morning) and complainant Mst. Rasheeda Begum (Charge Nurse), the following was concluded:

- 1. Mst. Najma Firdous (Charge Nurse) has some behavior issues or personality problem for being unmarried? Psychiatrist help can be taken in her case.
- 2. Mst. Najma Firdous (Charge Nurse) did not take proper route to handle the issue and instead tried to handle the case ill handedly.
- 3. Warden of hostels should be appointed.
- 4. Defined SOPs for hostel affairs for residents may be followed in future.
- 5. All illegal residents from the hostel rooms should be directed to leave with immediate order.
- 6. Moreover, Mst. Najma Firdous (Charge Nurse) kept illegal residents in her hostel room without permission from the competent authority, therefore her room allotment should be cancelled.
- 7. Mst. Najma Firdous (Charge Nurse) has no respect for hospital management or seniors. Her bad behaviour, arrogance and ready to flare fight are sufficient grounds so that Mst. Najma Firdous (Charge Nurse) may be relieved from this institution, with immediate effect.
- 8. Mst. Rasheeda Begum (Charge Nurse) shall be served with last warning for being involved in fight with Mst. Najma Firdous (Charge Nurse) and her hostel allotment should be cancelled for keeping illegal residents in her hostel room without permission from the competent authority.

9. Medical Superintendent, if directs committee can provide defined set of SOPs for hostel residents.

- Wenn

Member
Dr. Musarat Ali
MLO / PMO
DHQ Teaching Hospital
Kohat
Principal Medical Officer
DHQ Teaching Hospital
Kohat

Member
Dr. Syed Tahir Shah
DMS (Coord:)
DHQ Teaching Hospital
DHQ Teaching Hospital Kohat

Chairman
Dr. Naeem Shah
DMS (Estab: / HR)
DHQ Teaching Hospital
Occupy McGMa Parital Kohal
DHQ Teaching Hospital Kohal



DIRECTORATE GENERAL HEALTH KHYBER PAKHTUNKHWA PESHAWAR

All communications Should be Addressed to The Intector General Health Services Prahawar and net to any official by name

OFFICE ORDER

As approved by the competent authority the following posting/transfer of Registered Nurse Officer (RNO) / Charge Nurses (BPS-16) are hereby ordered on administrative ground in the interest of public Service with immediate effect:-

S.#	Name of Charge Nurse	From	То	Romarks	7
01	Mst: Najma Firdous D/O Muhammad Suleman	DHQ Hospital, Kohal	Shaheed Faild Khan DHQ Hospital, Hangu	Against the vacant post	1
02	RNO BS-16 List Rash da Begum	DIIO Hospital. Kohat		Againsl the vacant post	
		Lyalian			

NB: - Arnval/Departure reports should please be submitted to this Directorate for record.

DIRECTOR GENERAL HEALTH SERVICES, K.P. PESHAWAR

No 5717-25

Æ II.

Dated Pesn The

03/10 2023.

Copy forwarded to the -

01. Liedical Supor DHO Hospital Kehal for information will to his letter No 654 PF dated 15 02 2023

02. Medical Supply DHO Hospital Karak 03 Dated Heach Officer Kohal for information wir to his letter 140 3505/0HO/Kohal Gr Medica' Superintendent Shaheed Fand Khan DHO Hospital, Hangu

03. District Account Officer, Konal.

Of District Account Officer, Hingly

07, District Account Officer, Karak.

08. Registered Huise Officer concerned.

09 DA concerned, DGHS KP Poshawar.

For information and neces

ADDI: DIRECTOR (NURSING) DIRECTORATE GENERAL HEALTH

SERVICES, KP PESHAWAR

thex "C"

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KDA; KOHAT

OFFICE ORDER

With reference to the Additional Director (Nursing) Directorate General Health Service Khyber Pakhtunkhwa Peshawar office order No.5717-25/E.II DATED 03:10.2023; the following Registered Nurse Officer (RNO) / Charge Nurses (BS - 16) are hereby relieved from their duties at this hospital and directed to report to their new place of posting, with immediate effect, on administrative ground, in the best interest of public service (copy attached).

 Sr.	Name of Charge Nurse	From	To
1	Ms. Najma Firdous		Shaheed Farld Khan
2.	Ms. Rashida Beguin	DHQ Teaching Hospital KDA Kohat	DHQ Hospital Hangu DHQ Hospital Karak

MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

Dated Kohat the 🙋 _

Copy forwarded to the:-

- 1. Director General Health Services Khyber, Pakhtunkhwa Information w/r to his office No. quoted above.
- Regional Director Health Services (South) Khyber Pakhtunkhwa.

3. Medical Superintendent, DHQ Hospital Karak.

4. Medical Superintendent, Shaheed Farid Khan DHQ Hospital Hangu.

5. District Comptroller of Accounts, Kohats

6. Deputy Medical Superintendent (Admin) DHQ Teaching Hospital KDA Kohat.

Nursing Superintendent DHQ Teaching Hospital KDA Kohat.

- Accounts / Establishment Sections DHQ Teaching Hospital KDA Kohat.
- Charge Nurses concerned.

For information and further necessary action.

بخدمت جناب سیکرٹری هیلته صاحب، خیبرپختونخواه. پشاور

درخواست بمراد کینسل کرنے آفس آرڈ رنبر 5717-25/EH مصدرہ 3 اکتوبر 2023

جناب عالی! گزارش ہے۔

- 1۔ یہ کہ سائلہ DHQ ٹیجنگ جیتال KDA کوہاٹ میں رجسٹرڈ نرسنگ آفیسر RNO/ جارج زس(BS-16) خدمات انجام دے رہی ہوں ،اور میری سروس 13 سالوں پر محیط ہے۔
- 2۔ یہ کہ مبینال کے زرنگ ہاٹل میں تنازعہ ہوکر معاملہ انکوائری تک بینی گیا انکوائری 03/04/2023 کورپورٹ آئی،اوراس انکوائری کے بنیاد پروارننگ دیکر معاملہ ختم کردیا گیا ۔ انکوائری رپورٹ اوروارننگ لیٹرلف بندا ہے۔
- 3۔ یہ کہ سائلہ اس کے بعد بدستورای سرکاری فرائض منصبی انجام دے رہی ہوں کہ اچانگ 03/10/2023 کوسائلہ کو بغیر قانونی میں کہ دورراز علاقہ منگوٹرانسفر کردیا گیا جو کہ غیر قانونی ہے، آفس آرڈرکی کالی لف بندا ہے۔
- ۔ پیکس انکہ بنیا دی طور پرکرک سے تعلق رکھتی ہے اور نزدیک اسٹیشن کو ہاٹ میں ڈبوٹی انجام دے رہی ہوں اور چھٹیوں میں گھر جا کراپنے بوڑھے والدین کی تیماری داری کررہی ہے جو کہ ذریر علاج ہیں اور سائلہ گھر کی واحد گفیل بھی ہے اور سنگل ہے، سائلہ کیلئے ہنگو جیسے دور دراز علاقہ جا کرڈیوٹی انجام دینا ناممکن ہے۔

لہذاا ستدعاہے کہ سائلہ کا ٹرانسفرآ رڈرمور ند 03/10/2023 کینسل فرما کرسائلہ کواپنے اسٹیشن DHQ کوہاٹ میں ڈیوٹی انجام دینے کا تھم صاور فرما ئیں۔

الرتوم:05/10/2023

عرضى

سر کوید ا نجمه فردوس دلد محد سلمان RNO/چارج نرس ، DHQ میتنال کو باث یا



GOVERNMENT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

No SOH-III/3-5/2023/Najma Firdous Dated the Peshawar 12th October, 2023

To

The Director General, Health Services Khyber Pakhtunkhwa Peshawar

Subject REQUEST FOR CANCELLATION OF POSTING/TRANSFER ORDER.

l am directed to refer to the subject noted above and to state that Miss Najma Firdous Charge Nurse (BS-16) attached to DHQ Hospital Kohat (under transfer to DHQ Hospital Hangu) has submitted a Departmental appeal against the office order dated 03.10.2023 of Director General Health Services Khyber Pakhtunkhwa to this Department and request for cancellation of the above mentioned order.

In view of the above it is therefore, request that views/comments in the subject case may be furnished to this Department at the earliest to proceed further in the matter, please.

Endst: of even no & date.

Copy forwarded to:-

1. PS to Secretary Health, Khyber Pakhtunkhwa.

2. P S to Special Secretary Health Department.

SECTION OFFICER-IN

The Medical Superintendent DHQ Teaching Hospital KDA Kohat.

Subject:

COMPLAINT AGAINST BELLIGERENT BEHAVIOR OF C/N NAJMA **FIRDOS**

Respected Sir.

I would like to bring into your kind consideration the hostile behavior of one of our colleague staff Miss Najma. Yesterday she alongwith her sisters entered my room without knocking, she was furious and combative and used very rough tone. Her behavior was very rude and violent and she alongwith her sister and niece bear me up. This is not the first instance this has happened. Her violent behavior is habitual. She and her sisters sneak into rooms without seeking any prior permission and threaten fellow staff members, sometimes heating them up. I would like to mention that her married sisters are living in the hostel illegally. At first we here with her rude behavior thinking she will change but now we've had enough of her and cannot put up with her belligerent behavior ausmore. She was also warned to behave herself few days bad but in vain

Your kind honour is therefore requested to kindly take strict actions against her

M. Palini merchant Can Wish Marking.

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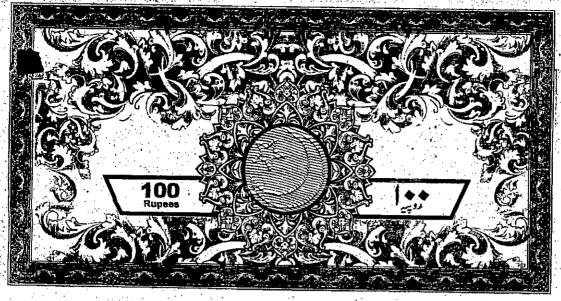
Contract The Contract and Mish Marking. Mr. Markida, Guzaliza 23 M. Land Mer /2 pod worked

Yours truly,

Technica gorge

Ms. Rashida Beguni Charge Nurse

DHQ Teaching Hospital KDA Kohat



اقرورن م إراجى نام Ely compresent to child so of the Usia رق ورم را من و لا لا لا الله المالية اقرار ہے کے مرلی اول کا برلی رویم کا مقر زنانہ وسطم میں داھا ہم المنظرال في المراق دويم المر اومات من دناد جسم الرسرة بليم الاراث يم مرنق اول بحم مروور طالات من تنك آئي اورلوك ليوليس كو طبردار كما لوكل يوليس كى مُوافِلت بردولون مُوقِين كُوفِيعِلْ برراضى سا ادر مزنت دوئم المعن طان كو أثبيره دنا وزي حسل من حلفا برمن اور مرانسفر له حانسگا- تحریر شعری نام سال می می میں ا And the Wind 013 8 3 07 97 3 5/2 1/2 20 1/2 2 Asif Klean C So Cais Khan Kur matu Bali Tongs 1430175548117

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KDA; KOHAT

1646

Dated Kohat the // /05/2023

To.

Ms. Najma Firdous (Charge Nurse) DHQ Teaching Hospital KDA Kohat.

Subject:-

FINAL NOTICE

Memo:

You were directed to vacate the room occupied by you in the nursing hostel of this institution vide this office letter No.1605/PF dated 06.05.2023, but you failed to obey the order.

You are hereby once again directed to vacate the room in the nursing hostel within 24-hours, positively; failing which strict disciplinary action will be initiated against you.

> MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT

Endst: No. and Date Even:

Copy forwarded to the:-

- 1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
- Health Services (South) 2. Regional Director Pakhtunkhwa.
- 3. Deputy Medical Superintendent (Admin) DHQ Teaching. Hospital KDA Kohat.
- 4. Provost DHQ Teaching Hospital KDA Kohat.
- 5. Nursing Superintendent DHQ Teaching Hospital KDA Kohat.

MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL KOHAT.

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

OFFICE ORDER

MS. NAJMA FIRDUS (Charge Nurse) is hereby allotted <u>Visitor Room</u> of the Nursing Hostel, DHQ Hospital, KDA, Kohat, alongwith MS. FARZANA KAUSER (JCT Cardiology – Female) in the public interest with Immediate effect.

SD/ MEDICAL SUPERINTENDENT DHQ HOSPITAL, KDA, KOHAT

No. 8654 1K-37.

Dated Kohat (/ /01/2012.

Copy forwarded to the:-

- 1. Accountant, DHQ Hospital, KDA, Kohal.
- 2. Warden, Nursing Hostel, DHQ Hospital, KDA, Kohat.
- Person concerned.

For information and necessary action.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL, KDA, KOHAT

Z

بخدمت جناب فرى جى بميلته صاحب بيثاور

اجر ام كيماته ومن كى جاتى ب كدين شاف زى في قروق وى الى كويسينال كواك يل ساف زى كاليونى سرانجام دروى وورى مادرين كوباك بل المان الله المن المراكس بالترام الله المراكس موں -PNC دول کے مطابق تویز مزیج کی ہاشل ہے اور میں بیچلی ہاشل کی اتھ متعلقہ مسائل اور متعلقہ افراؤی نازیبار دیکا شکاعت کردای مول میں درخواست کرتی ہوں کہ اب میری شکاعت سیس اور میرے مبائل ہے ل کی جانبے پڑتال کرین

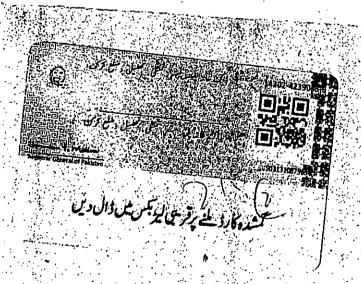
جال = بنیادی مسط شروع موست بین اورمر می تنسیلا میان کرتی موں کدمارے بیل زمر باشل میں مرد حقرات کا آنا جانا رہتا ہے اور ناز بیا خرکتیں کرتے رہے بین جس شروع اور انداز بیا خرکتیں کرتے ہے۔ پارس اور شاف کی مردودست ان کے روم کے آتے ہیں منع کرنے والاکوئی تیں ہے اورا ایسے مالات میں ہم خود کو تحفوظ محسون تیس کرتی ہے۔ اس کے علاوہ اس باشل کے شاف خرمز نے اپ نے لیے ذاتی ایل ليكل كلسر كشن كرك اسيد ليكواوار بنائ بين جورول محفلاف بين- إن شن فل فيلى كيدا تعدم أثن يذير بين-جيدا مال اورساس، بينتيج بمبتجيان ، بينس بيح سب شامل بين-اوران سب مين حارا المضريين لوث بساكراك بارسام الس وكم ليند كرت وووالنااع الس ان كور بلوكر في وحكل وسية باور طاف كوسائل بدا كرف والديدوية ب- امار بالش كاكوكي والزريكوليش میں ہادر مارے این شریش نے شادی شدہ زرز کو باش میں رہنے کی موات دی مولی ہے۔ ان سے ساتھ اپنے شو برمینید، چدرہ دان کے باش میں رہائش پذیر موسے ہیں۔ میں نے این مشریش میں ورخواست دی ہے چوکدریجلر ہاسل ہاس میں مروصفرات کا آنا جانا بند ہونا چاہیے غورطلب ہا گرمیرے دوم کدارو کرد دومز میں مصفرات بیں تو بھی کیسے خود کو کھنو طائف ورکسکتی ہو۔ ایسے حالات يس خودكو غير محفوظ لعبوركرتي بول ، اوراس بار مصر من المي فسطريش من ورخواست وى قوشاوى شده ترمز من سے تين جا زرمز في اخراد كروپ بندى بنائي اور باشل توكيا ميتال سن فكالنے كا دم كميان وسادى بساينسنريش ش واكرطا برعلى شاه رسرت على اورقاض هيم في شاوى شده زمز كوكها كراب لوك شاف كوخلاف المينسنريش مين ورخواست ويدوام ان كوثرانسفركر دين على ان واكثر صاحبان ك ان زمز کرما تعد تعلقات بھے، ایل شریق کی طرف سے مجھے پرائی مرخی کے تحت میٹی بنالی کی اور کمیٹی کی طرف سے جو فیصلہ سنایا سی سے سناف طاہر اوتا ہے کہ ان کی مران کا میرا ساتھ کوئی ذاتی وقتی ہوا ور ان لوگوں نے جوانحواری میں میان کیا ہے وہ انتہائی تو بین آمیز ہے، سرائلوائری میں مجی کھی افاظ نیس لکستا اکوائری کے قیطے کوئی بھی پڑھ لے قواس سے صاف پر جاتا ہے کہ ایک مشریش کس قدر پسل ہوا ہے۔ میرے لئے ماہرنفسیات ڈاکٹر کو بلانے کا کہا ہے کہ جسے کو ل اکوائری نہیں مجمعے پرمیڈیکل بورڈ بیٹما ہو، اس ایٹونٹریٹن میں اگرکون اسپے حقوق کیلئے بات کرتا ہوا ہے۔ مارتی ہوتی ہے کہ انسان چرا کردہ جاتا ہے۔ اس کے علاوہ اس میں ایک اصف تای الیٹریش ہے جودوسال سے جمعے بلیٹ سل کرنے میں نگاہوا ہے میری فیلی والدل کو خواکسکر جمعے بلیٹ میں کہ جس میرے فيل والساس كا بالون عن تين أع توسايق MS كون ك دريع في بليك فيل كريات الماليل في في بلايا اور عن في ساري مود عال عا كاه كياء الراج إلى نامر في محفظ تحفظ دیا میں سابقدائم الیں کے جانے کے بعد آصف بھرائے حرکتوں پر اُٹر آیا ، اِٹل میں میری دوم کی بھل خراب کرنے کی کوشش کی بھلف طریقوں سے جھے تک کرتا رہتا ہے، اس کے تمام سازش میں كي درم اور مهارا اينسفريش ان شي ملوث ب، ان كى ملى بمكت بسب مور باب سريس درخواست كرتى مول كما كلوائرى كميني اوراس بالنك بي شال تمام وامريخال ايكشن الياجاسي ، كيونك في كوره خس نے میرے کر کٹر اور پرسنالٹی پر ڈاخ لگانے کی کوشش کی جس سے بیل از دوائ زیم کی متاثر ہوئتی ہے، جیکہ فرور کھی نے میٹال میں مشہور کردکھا ہے کہ چیے مطلق فریٹسٹ کی صرورت ہے۔ بیٹنلی مریینہ ہے۔ چنکہ بیا اثر بندے تے اور میری بات سائی میں وے دی تھی، بجائے ریک ایم ایس صاحب ٹادی شدہ فرمز کو بیآ رؤ روسیتے کو اسپے شوہر کو ہاشل ندلایا کریں اور آپ اوگ اسپے لیے کارٹر کا بندو بست كرين كوظم باشل عيرزمزكيك بوتا ب_ألثا ايم الس صاحب في محمد أراد وياكداب يهال عب جائد ميل بش خود كوتفوظ بحتى بوقا وكل بش ميرى وشفى به اور بس في الميم المي صاحب كواس بارے میں کی بارا کا و کیا ہے الیے میں اور تک کرنے کی وشش کرنا ہے کہ میں میتال سے باہر بوجاؤت وہ فیصف کر بگاہ میں بہت فیر محقوظ ہوجاؤگی،

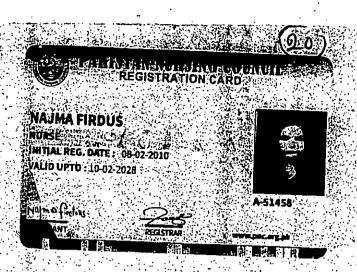
ين اب مناحبان سندورخواست كرتى بول كماس برمعاف وشفاف الحوائرى بنائى جائے واس مسئلے كامناسب على لكالا جائے ميں بہتال كروگزر يوليكن كے مطابق رہنا جا جی بول بيكن يمال ميرى وندگ اجرن بنادي كى ب، جم صرف اور مرف الى حقوق ما تنى جوق ما تنى بول امرل كرمطابق بول اور PNC رواز كرمطابق جوت مجمله ملنا ما بيناس كاطلبكار مول -

لبذااب صامبان شفاف الكوائرى كرك واقع سى الوث اصل الزمان كوكيفركرواد تك ينتجاكي -

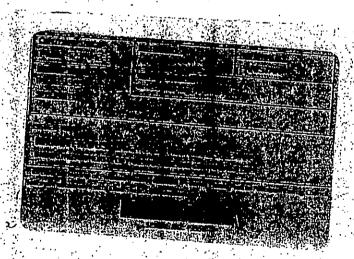
عام: المحدار وسل التي كارونيزي 240 9264 ود 410 بینان کے اور کا رہے ہولات بینان کا رہے مزمسر) 17/7 has E.V







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(91)

WAKALATNAMA

IN THE Khyber Pakhtunkhwa Service Fribunal Peshawace

Met Najma Firdaus-VERSUS

(Petitioners)

在100g/mg 1-2000年1986-12000年12000年1200

(Plaintiffs)

(Applicants.)

(Complainant) (Degree Holder)

Secretary Health and others

(Respondents) (Defendants) (Accused) (Judgment Debtors)

Case

do hereby appoint and constitute **MUHIB ULLAH TARICHVI Advocate** High court, Peshawar, to appear. Plead, act, compromise, withdraw or refer to arbitration for me/ us as my/ our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any another Advocate/ Counsel at my/ our matter.

Attested & Accepted:

Dated: 5 / 1 / 2024

MUHIB ULLAH TARICHVI

Advocate High Court Peshawar

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BC No: 09-04-03

Clients

Najma Firdaus.

0334832832

CNK 14202-4239043-6