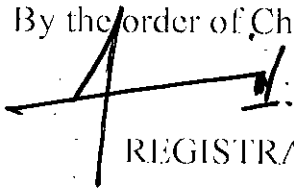


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Appeal No. 91/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
3	2	3
1	05/01/2024	<p>The appeal of Mr. Muhammad Alam received today by registered post through Sheikh Iftikhar ul Haq Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____.</p> <p>By the order of Chairman  REGISTRAR</p>

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. 91/ /2024

Muhammad Alam

**VERSUS**

Inspector General of Police and others

**SERVICE APPEAL**

**INDEX**

S.No	Particulars of the Documents	Annexure	Page
1.	Grounds of Service Appeal and affidavits	--	1-5
2.	Copy of the service card	A	6-9
3.	Copies of medical treatment records	B	10-30
4.	Copies of the impugned order dated 31/08/2023 along with documents of alleged inquiry	C	31-33
5.	Copies of the departmental appeal along with receipt letter and order dated 23/11/2023	D to D/2	34 38
6.	Wakalatnama	--	39

Date: 3 /01/2024

Yours Humble Appellant

  
**Muhammad Alam**

Through Counsel

  
**Sheikh Iftikhar ul Haq**

Advocate Supreme Court

Cell#0345-9785920

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. 91 /2024

**Muhammad Alam** son of Shah Alam r/o Basti Dirkhanwali  
District Dera Ismail Khan, Ex-Junior Pharmacy Technician  
Basti Darkhanawali Dera Ismail Khan.

Cell#0333-486155

**Appellant**

**Versus**

1. Additional Chief Secretary Home and Tribal Affair  
Department Khyber Pakhtunkhwa Peshawar.
2. Inspector General of Prison Khyber Pakhtunkhwa  
Peshawar.
3. Superintendent Central Prison Dera Ismail Khan.
4. District Accounts Officer, Dera Ismail Khan.

.....**Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICES  
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED  
ORDER#9/2J-2011 31709 DATED 31/08/2023 ISSUED BY  
RESPONDENT#2 VIDE WHICH THE APPELLANT WAS  
REMOVED FROM SERVICE WITHOUT ANY LAWFUL  
JUSTIFICATION AS WELL AS AGAINST THE  
ORDER#SO(PRISON-I)HD/8-3/KC/2023 DATED 23/11/2023  
OF APPELLATE AUTHORITY/RESPONDENT#1 VIDE THE  
DEPARTMENTAL APPEAL OF THE APPELLANT WAS  
PARTIALLY ACCEPTED AND REMOVAL FROM SERVICE WAS  
CONVERTED INTO COMPULSORY RETIREMENT.**

2

**PRAYER:**

On acceptance of the instant Service Appeal the impugned order dated 31/08/2023 issued by the respondent#2 as well as the order dated 23/11/2023 issued by the respondent#1 may please be set aside/modified and the appellant may kindly be reinstated into service with all back benefits including salaries from 27/03/2023 till reinstatement and onward.

Respectfully Sheweth:-

The Appellant most respectfully submits as under:-

**BRIEF FACTS:**

1. That the appellant was appointed as Junior Pharmacy Technician in the incumbency of respondents/authority on 14/10/2011 in the Central Prison Dera Ismail Khan after observing all the legal and codel fulfillments. Copy of the service record is annexed as **Annexure-A**.
2. That during the performance of duties with full satisfaction of superiors the appellant fall seriously ill and was diagnosed a patient of Diabetes, hypertension, high blood pressure, due to this reason the appellant submitted medical prescriptions and submitted for leave from 27/03/2023 to 30/08/2023 for medical treatment. Copies of medical treatment records are annexed as **Annexure-B**.
3. That the respondents/authority did not consider the genuine, legitimate and lawful reasons, issued the impugned Order#9/2J-2011 31709 dated 31/08/2023 vide which the service of appellant was removed from 27/03/2023 on the ground of alleged absence. Copies of the impugned order dated 31/08/2023 along with documents of alleged inquiry are annexed as **Annexure-C**.
4. That the appellant submitted a departmental appeal to respondent#1 wherein, the appellate authority was pleased to covert the order of removal from service into compulsory retirement from service vide order#SO(PRISON-I)HD/8-

3/KC/2023 DATED ~~23/11/2023~~ which was received to the appellant on 06/12/2023. Copies of the departmental appeal along with receipt letter and order dated 23/11/2023 are annexed as **Annexure-D, D/1 & D/2**.

5. That the appellant feeling aggrieved by both the impugned orders, hence, the instant appeal is being filed, inter alia, on the following ground.

**GROUND:**

- a. That the impugned orders are against law, facts, natural justice, void ab initio, hence, liable to be set aside and the order of the respondent#1 on the departmental appeal may also be set aside/modified.
- b. That the appellant has never enjoyed any kind of leave throughout the entire length of service, which can be verified from service record of appellant, and the appellant produced the valid medical description, hence, the appellant now fit and recovered, hence, on this sole ground the appeal may kindly be accepted.
- c. That appellant was not given an opportunity of personal hearing and no proper inquiry whatsoever was conducted against the appellant, hence, the impugned orders are coram non iudice and liable to be set aside.
- d. That the whole proceedings (although not admitted) whatsoever has been done by the respondents/authority in slipshod manner expeditiously.
- e. That the appellant is a poor fellow having family with children and there is no earning hand except the service of

4

appellant, hence, the service of appellant is liable to be reinstated along with all back benefits.

- f. That the impugned orders are against the principle of law, service rules and not in commenced of article 10-A of the Constitution of the Islamic Republic of Pakistan, 1973.
- g. That counsel for appellant may kindly be allowed to raise additional grounds at the time of arguments.

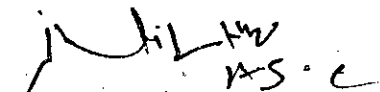
**It is therefore, humbly prayed that on acceptance of the instant Service Appeal the impugned order dated 31/08/2023 issued by the respondent#2 as well as the order dated 23/11/2023 issued by the respondent#1 may please be set aside/modified and the appellant may kindly be reinstated into service with all back benefits including salaries from 27/03/2023 till reinstatement and onward.**

Date: 3 /01/2024

Yours Humble Appellant



**Muhammad Alam**  
Through Counsel



**Sheikh Iftikhar ul Haq**  
Advocate Supreme Court  
Cell#0345-9785920

5

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. \_\_\_\_\_/2024

Muhammad Alam

**VERSUS**

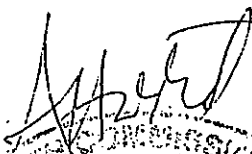
Additional Chief Secretary and others

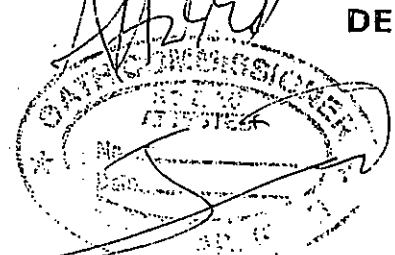
**SERVICE APPEAL**

**AFFIDAVIT**

I, **Muhammad Alam** son of Shah Alam r/o Basti Dir Khanwali District Dera Ismail Khan, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and the allegations of admission in the impugned order of appellate authority in respect of Hiring of Iwazi and involving in private business is false, factitious and thus nothing has been concealed from this Honourable Court.

Dated: 03/01/2024

  
**DEPONENT**

  
3-1-2024

Note: - The entries in this page should be renewed or re-attested at least every five years, and the Signature in lines 9 and 10 should be dated.

6  
Ann: "A"

Name MUHAMMAD ALAM

Race GHANDA PUR (PATAN)

Residence MEMON KARYANA STOLE BASTI DARAHANAHAL DIST

Father's name and residence SHAH ALAM

Date of birth by Christian era or as nearly as can be ascertained 02-03-1986

Exact height by measurement \_\_\_\_\_

ate

Personal marks for identification A HOOND MARK ON RT EAR

Left hand thumb and finger impression of (non-gazetted Officer) \_\_\_\_\_



Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb

9. Signature of Government Servant [Signature]

10. Signature and Designation of the Head of the Office, or other Attesting Officer

[Signature]  
SUPERINTENDENT  
Sub-dail Lakkhi Marwa

Attested to be True Copy

[Signature]



1	2	3	4		5		6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post.	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant		
درجہ ملازمت	عارضی - مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پیشین کا مستحق ہے (9)	تواہ بطور عارضی ملازمت	زائد تواہ بطور قائم مقام	ماسوائے تواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم		
<p>63650</p> <p>63650 - 17600</p>			Rs.	Ps.	Rs.	Ps.			
							Rs. 6250/- P.M.		

Attestal to be  
cross city

M. Khan

8	9	10	11	12	13	14	15	
Signature of Government Servant	Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office or other attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure or reward or praised of the Government servant
					Name and duration of leave taken	Period		

8

دستخط سرکاری ملازم

دستخط افسر مجاز

تاریخ انقطاع ملازمت

وجوہات انقطاع ملازمت ترقی - تبادلہ یا برطرفی

دستخط افسر مجاز

رخصت کی نوعیت و معیار

عرصہ

Govt: to which debitable  
گورنمنٹ جسے رقم ادا ہوگی

دستخط افسر مجاز

سزایا سزا یا غیر مناسب کارکردگی کارپکارڈ

*[Signature]*  
SUPERINTENDENT  
Sub Jail Lakkhi Marwat

14<sup>10</sup> FN. Appointed as Junior  
Technician in BPS-09 vide  
Inspector General of Prisons  
Khyber Pakhtunkhwa Province  
No. 20095 dated 13-10-2011.

*[Signature]*  
SUPERINTENDENT  
Sub Jail Lakkhi Marwat

*[Signature]*  
Draught 6954/105148 Page 11  
3<sup>11</sup> 11/11

Service verified up to 14/10/11  
and other amt. p. sh. ok  
decent

*[Signature]*  
SUPERINTENDENT  
Sub Jail Lakkhi Marwat

Transferred to judicial lock up TARI  
vide Inspector General of Prisons  
Circular No S B-4 of 10-1-2012

*Handwritten notes:*  
Mentioned in...  
time copy

*[Signature]*

*[Signature]*  
SUPERINTENDENT  
Sub Jail Lakkhi Marwat

9

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Servant
درجہ ملازمت	عارضی مستقل قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پٹیشن کا مستحق ہے	تجواریطور عارضی ملازمت	زائد 300/- تا 350/-	دیوانے کے اجراء کے علاوہ	تاریخ تقرری	دستخط سرکاری ملازم
<p>5200-388-17/10/13 B/P-9 J/P</p>			Rs. Ps.	Rs. Ps.		6580/-	1-12-12
<p>do</p>							
<p>do</p>						B/Pay Pm 6960/-	1-12-2013
<p>do</p>						B/Pay Pm 7340/-	1-12-14

30



OFFICE OF THE  
**SUPERINTENDENT**

CENTRAL PRISON D.I. KHAN

0966-9280299 @cpdikhan1@gmail.com

No. 2247 Date: 13-04-2023

10

Ann: "B"

To:

Mr. Muhammad Alam,  
Junior Technician Pharmacy.  
Attached to: Central Prison D.I. Khan.

Subject: EXPLANATION.

Memo.

It is to inform you that you submitted an application along with medical certificate (copies attached) for 10 days obtained from DHQ Hospital D.I. Khan w.e.f 17.03.2023 to 26.03.2023 and you were due to resume your duty on 27.03.2023 but you did not resume duties till date.

You are therefore, directed to explain your position within in 03 days that why disciplinary proceedings should not be initiated against you. In case of non/unsatisfactory reply disciplinary action will be initiated against you.

  
SUPERINTENDENT  
CENTRAL PRISON D.I. KHAN

Recd today on  
18-4-2022 at  
12:00 AM

presented to the  
Prison copy  
M. Alam

درست طلب سبب شدت کما سئل حل ذمیرہ سے مطلق فاقہ

EXPLANATION

مخبرہ سے کئی روزی 2247 تاریخ 23-04-13

عنوان

باب عالی

خود بخود گذشت حسب سئل یہ ہے کہ علم میں اس کی تائید  
 صحت کے بارے میں عرض دشمن لڑکا ہے کہ سئل سبب  
 خصوصی استاد کا متکا رہے بلکہ اس میں مشورہ لڑکے کے علاوہ  
 سئل بلکہ سبب سے مسائل کا کافی حکم سے سائنس ارباب  
 سئل و ص سے سئل اس کی ڈیڑھ سے نام دینے سے قاصر ہے۔  
 بلکہ جبوزی حد تک سئل کیوں کیا گیا اس کی صحت کو بحال کرنے کی  
 کوشش کر رہا ہے۔ لیکن تا حال سئل کی صحت سئل کو بحال کرنے سے  
 اس کے لئے ڈیڑھ سے قاصر ہے۔

لیڈا برتے کریم میں اس کی ذمہ لڑکے کی سبب سے کئی روزی 23-03-27  
 سے سبب سے کئی روزی 2023-05-05 تک سئل کو لڑکے کی سبب سے کئی روزی  
 اس کی سبب سے کئی روزی سئل کی ذمہ لڑکے کی سبب سے کئی روزی  
 میں لڑکے کی سبب سے کئی روزی

19/4/2023

19/4/22

M. K. Raza  
 Director of Health Services  
 District Government  
 M. Khan

Name \_\_\_\_\_  
 Yearly No. 15576 Rs. 30/-  
 Date 1/20 Disease \_\_\_\_\_

27/3/18 - Diarrhea  
 - Fatigue Fever

X Tab Oxidil 1gm (15)  
 1+1

Tab Azomax 500mg (10)  
 1+1

Tab Zynac 100 (10)  
 1+1

Tab Mandox 500mg (10)  
 1+1

Complete Bed Rest for 7 Days

M. Khan

Medical Officer  
 MTHQ Hospital D.I.

**DHO TEACHING HOSPITAL D.I.KHAN.**

**Out Door Patients Department**

**13**

Name PLC 12

Yearly No. \_\_\_\_\_ Rs. 30/-

Date 7/10/2023 Disease 81586

9/10 High  
M. 110/110

A Hypertension  
Diabetic  
Sub

Prob. 20/10  
- Vertigo  
- Head  
- Thirst

- Tail Tumor  
- Tail Nodules  
- Tail Nodules  
- Tail Nodules

- Pruritus  
- Tail Staining  
Advised op/pt. Beel  
Rest for 103  
M. Khan

MEDICAL OFFICER  
DHO MTH HOSPITAL  
D.I.KHAN

میرت سے مندرجہ ذیل کے مسائل حل کر کے دیکھو اور  
جواب لکھیے

موجودہ دہائی میں مندرجہ ذیل پروجیکٹوں میں سے  
سے کون سا ہے - ایک ایسی پراجیکٹ کا (3) منقشوں کا پیشگی خاکہ  
تیار کرو اور اس کو رفرنس میں مندرجہ ذیل ایک ایسی پروجیکٹ کے

عین الاثر بنائیے

7/8  
2022

نور

دعا اللہ

میرت سے مندرجہ ذیل کے مسائل حل کر کے دیکھو اور  
جواب لکھیے

Handwritten signature

M. Hossain



TEACHING HOSPITAL OF LONDON  
MEDICAL RECORDS DEPARTMENT

15

No.	Date	Diagnosis	Operation	Remarks
100	1/15/20	...	...	...
101	1/16/20	...	...	...
102	1/17/20	...	...	...
103	1/18/20	...	...	...
104	1/19/20	...	...	...
105	1/20/20	...	...	...
106	1/21/20	...	...	...
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108	1/23/20	...	...	...
109	1/24/20	...	...	...
110	1/25/20	...	...	...
111	1/26/20	...	...	...
112	1/27/20	...	...	...
113	1/28/20	...	...	...
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116	1/31/20	...	...	...
117	2/1/20	...	...	...
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120	2/4/20	...	...	...
121	2/5/20	...	...	...
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124	2/8/20	...	...	...
125	2/9/20	...	...	...
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252	6/14/20	...	...	...
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254	6/16/20	...	...	...
255	6/17/20	...	...	...
256	6/18/20	...	...	...
257	6/19/20	...	...	...
258	6/20/20	...	...	...
259	6/21/20	...	...	...
260	6/22/20	...	...	...
261	6/23/20	...	...	...
262	6/24/20	...	...	...
263	6/25/20	...	...	...
264	6/26/20	...	...	...
265	6/27/20	...	...	...
266	6/28/20	...	...	...
267	6/29/20	...	...	...
268	6/30/20	...	...	...
269	7/1/20	...	...	...
270	7/2/20	...	...	...
271	7/3/20	...	...	...
272	7/4/20	...	...	...
273	7/5/20	...	...	...
274	7/6/20	...	...	...
275	7/7/20	...	...	...
276	7/8/20	...	...	...
277	7/9/20	...	...	...
278	7/10/20	...	...	...
279	7/11/20	...	...	...
280	7/12/20	...	...	...
281	7/13/20	...	...	...
282	7/14/20	...	...	...
283	7/15/20	...	...	...
284	7/16/20	...	...	...
285	7/17/20	...	...	...
286	7/18/20	...	...	...
287	7/19/20	...	...	...
288	7/20/20	...	...	...
289	7/21/20	...	...	...
290	7/22/20	...	...	...
291	7/23/20	...	...	...
292	7/24/20	...	...	...
293	7/25/20	...	...	...
294	7/26/20	...	...	...
295	7/27/20	...	...	...
296	7/28/20	...	...	...
297	7/29/20	...	...	...
298	7/30/20	...	...	...
299	7/31/20	...	...	...
300	8/1/20	...	...	...

Attested  
true copy  
M. Allen

بسم الله الرحمن الرحيم  
الحمد لله رب العالمين

16

صاحب عالی

خوارزمی الخوارزمی صاحب سنی بزرگ بهاری این دلیلی  
مردی است در دست است - سنی که این راه سید علی را  
مستوران کرد که کوروزان سنی سید علی را این همراهی

عین خوارزمی

فوق العالی

17  
دوره

مجلس علمیه

Arrested by  
M. Akbar

D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

17

Name Ali

Yearly No. 68509 Rs. 30/-

Date 27<sup>th</sup> 06/2023 Disease Δ Pneu

C/O  
High grade  
- Jw  
- G. Body  
- Myals  
- M.

Al  
Tub. Pneu  
17/1  
Tub. R. side  
- Cap. R. side  
- 6 ves  
- 2+

Relieved  
Rest  
Med of  
+ 2  
Cpt. Bed  
(02) ves  
M. Alex

بسم الله الرحمن الرحيم  
الحمد لله رب العالمين  
والصلاة والسلام على سيد المرسلين  
والله اعلم بالصواب

مورد بائنه الشمس منبره منبره  
ميراثه ميراثه ميراثه  
ميراثه ميراثه ميراثه

عین توارث ہوگی

مصدقہ

عبدالله

مصدقہ

Attested to me  
true and

M. Alami

D.H.O. TEACHING HOSPITAL D.I. KHAN  
OUT DOOR PATIENTS DEPARTMENT

19

Name \_\_\_\_\_

Yearly No. \_\_\_\_\_

Rs. 30/-

Date 12/1/20

Disease

65928

High grade  
- vertigo  
- gait  
- Body Pain  
- G.D. nerves

△ Pw  
- T.D. R. 50%  
- T.D. P. 50%  
- T.D. L. 50%  
- T.D. 20%  
- T.D. 30%

per chest  
C.B.E.  
- Amisri  
- Rest  
- M. Khan

Medical Officer  
D.H.O. Hospital D.I. Khan

10/-

Handwritten notes and signatures on the right margin.

مذکرہ لکھنؤ، خانہ کتب خانہ، لکھنؤ، 20

حاجی صاحب

مذکرہ لکھنؤ، خانہ کتب خانہ، لکھنؤ، 20  
 خانہ کتب خانہ، لکھنؤ، 20  
 خانہ کتب خانہ، لکھنؤ، 20  
 خانہ کتب خانہ، لکھنؤ، 20

خانہ کتب خانہ، لکھنؤ، 20

خانہ کتب خانہ، لکھنؤ، 20

خانہ کتب خانہ، لکھنؤ، 20  
 Attached to  
 tree 14  
 14. Khan

21  
D. J. G. TEACHING HOSPITAL D. KHAN.  
OUT DOOR PATIENT DEPARTMENT

Name \_\_\_\_\_

Yearly No. \_\_\_\_\_

56282

Rs. 30/-

Date 1 / 120

Disease

AD

25/03/23  
B.P. 100/60  
min  
- Depressed mood  
- Buried on the  
- vertigo  
- dyspepsia

- Pure  
-  
- Cap. Rank  
- T. L. X. H. 03.4  
- Cove - C Subst  
- T. L. X. H. 03.4  
- T. L. X. H. 03.4

Advised clinic by  
R. L. J. in (17) D. J. G.

Accepted  
To be done  
copy

M. Khan

Medical Officer  
D. J. G. Hospital D. Khan

مؤدبان گذارش بعد از سوال بوم بهاری اینی در لوی و لوی

جان عالی

مؤدبان گذارش بعد از سوال بوم بهاری اینی در لوی و لوی  
دریست و قلمریه برات میزنه اینی سوال با جواب میزنه  
منظور فرزند کرم است که فرزندش - منظر لوی و لوی میزنه  
عین گذارش بوم -

مؤدبان گذارش

فقط القار

مؤدبان گذارش بعد از سوال بوم بهاری اینی در لوی و لوی  
Actual to be true  
M. Flew



H. C. TEACHING HOSPITAL D. I. KHAN  
Out Door Patients Department

Name \_\_\_\_\_  
Yearly No. \_\_\_\_\_ Re-30/-  
Date 1/20/1915 Disease S228

Go  
Acute  
Back Pain  
M  
N  
O  
P  
Q  
R  
S  
T  
U  
V  
W  
X  
Y  
Z

A mild  
chest

Accepted to the  
Tree Camp  
M. Khan

ATTEMPT HOSPITAL

24  
مدرسہ عالیہ اسلامیہ کراچی

حصہ علی

مؤرخانہ الخیر میں لکھی ہے کہ مسائل کو مہربان سے بھیجیں اور  
سراپا نام دے سے کاہر ہے۔ مرزا کا نام مسائل کا نام  
مسئلہ نقل الیہ و سندھ اور فرزند کو فرستیں۔ اصل مسائل  
بمراہ نام - 22 -  
عین کورس میں ہوگی

نور 33/5/3

سید الفاضل

A  
من مسائل و علوم کان API سید الفاضل کراچی  
Accepted + me  
Tun edy  
M. Ali

25

D.H.O TEACHING HOSPITAL D.I.KHAN

Out Door Patient's Department

ZANANA HOSPITAL 143336

Name پلس

Yearly No. \_\_\_\_\_ Rs. 30/-

Date 1/20 Disease 47277

3/5

C/V

Δ Bachu

- Acute Bachu Pas - Re 500/-
- Vertigo
- Misch
- GI - cup. R. side 20 L
- Dysphagia
- Painful
- SP. Lechplex 4
- aj. myoglobin

Admitted in 10/10/20  
 Rest in bed  
 M. Alex

10/10/20  
 M. Alex

Medical Officer  
 D.H.O Hospital D.I.Khan

مکتبہ خیریت پبلشرز ہاؤس، لاہور، پاکستان  
خبر عالی

مکتبہ خیریت پبلشرز ہاؤس، لاہور، پاکستان  
مکتبہ خیریت پبلشرز ہاؤس، لاہور، پاکستان  
مکتبہ خیریت پبلشرز ہاؤس، لاہور، پاکستان  
مکتبہ خیریت پبلشرز ہاؤس، لاہور، پاکستان

فصل الف

تقریباً 1973

محمد علی خان  
Printed & bound  
at  
M. Khan

D.H.O TEACHING HOSPITAL D.I. KHAN.

27

Out Door Patient's Department

ZANANA HOSPITAL 196255

Name U L F U

Yearly No. \_\_\_\_\_ Rs. 30/-

Date 17/5 /20 Disease S 2960

Dysentery Fever

- 2 Tab Paralid CP (10)  
1+1
- Tab Sinaxamol (10)  
1+1
- Cap Omega 400 (14)  
1+1
- Tab Sulfas - 2 (3)  
1+1
- Tab Iventin (10)  
1+1

Complete bed rest for 5 Days  
 Accepted + ...  
 True ...  
 M. Khan

Medical Officer  
 D.H.O Hospital D.I. Khan

حضرت حبيب سہروردی کے ہاں سہیل جیل دہرا دھڑیل خان  
حبيب علی ا

مؤدبانہ گزارشیں سیکرٹری جیل دہرا دھڑیل خان  
سہیل جیل دہرا دھڑیل خان سے قلمبند ہونے پر  
سہیل جیل دہرا دھڑیل خان سے قلمبند ہونے پر  
سہیل جیل دہرا دھڑیل خان سے قلمبند ہونے پر

عین گزارش ہوگی

فقہ

السائل

عین سہیل جیل دہرا دھڑیل خان  
JPT سہیل جیل دہرا دھڑیل خان

prepared from copy

M. Meir

نومبر ۲۰۱۷

D.H.Q. TEACHING HOSPITAL D.I. KHAN.

Out Door Patients Department

29

Name

U. B. P. S. I.

Yearly No.

Rs. 30/-

Date

1/20

Disease

39202

Diarrhea

Fever

Nausea

Typhoid

16

Eso. Gout

16

16

16

16

16

Complete bed rest for 10

Days  
16-20-21-22-23-24-25-26-27-28-29-30-31

M. Khan

Medical Officer

MTI DHQ Hospital D.I. Khan

30  
کتاب عالی

سود بانگ الہیہ میں فقہہ مسئلہ کے تحت  
درجہ اولیٰ و دوم سے ڈیڑھ لاکھ روپے سے قاصر ہے  
کوئی ڈیڑھ لاکھ روپے سے زائد نہیں ہے  
16/4/22 سنہ 1341ھ  
عسکری کراچی

فقہہ  
للہ اعلم

مستندہ کتب خانہ  
TPT  
مستندہ کتب خانہ  
M. Akbar





31 Ann.  
"C"

**INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR**

091-9210334, 9210406

091-9213445

No. 9/2-J-204-17819 dated 10-05-2023

Dated 31-08-2023

**ORDER**

WHEREAS, Mr. Muhammad Alam Khan, Junior Technician Pharmacy (BPS-12) attached to Central Prison D.I.Khan absented himself from duty with effect from 27-03-2023 till date without prior permission of the competent authority as reported by Superintendent Central Prison D.I.Khan vide letter No. 2310 dated 17-04-2023. A notice was also served on him at his home address vide this office letter No. 9/2-J-204-17819 dated 10-05-2023 with the direction to resume his duties immediately failing which disciplinary action could be initiated against him under Rule-9 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

AND WHEREAS, after expiry of more than 15 days period, the accused official failed to resume his duty, therefore, as required under Rule-9 of ibid rules, a notice was published in two daily newspapers i.e. Roznama Wahdat dated 29-06-2023 & Roznama Aaj dated 04-07-2023 by directing him to resume duty within 15 days of publication of the notice. But after lapse of stipulated period given in the notice, he didn't resume his duty and in defense of his absence from 27-03-2023 to 05-08-2023, he submitted medical rest certificates issued by Medical Officer DHQ Teaching Hospital D.I.Khan, which are unauthorized according to Health Department circular letter No. SOH(V)/10-4/93 dated 02-11-1993 as a Medical Officer cannot advise bed rest for more than 03 days as this practice encourages the Govt. servants to avoid duty and indulge in indiscipline, hence, Medical Rest Certificates under discussion are totally unauthorized.

NOW THEREFORE, in exercise of powers conferred under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the undersigned being competent authority, hereby awards major penalty of "Removal from Service" to Mr. Muhammad Alam Khan, Junior Technician Pharmacy (BPS-12) attached to Central Prison D.I.Khan from the date of his willful absence i.e. 27-03-2023.

*M. Alam Khan*  
*M. Alam Khan*

*M. Alam Khan*

**INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR**

Endst; No. 31710-131

Copy of the above is forwarded to:

1. The Superintendent, Central Prison D.I.Khan for information and necessary action with reference to his letter No. 4666/WE dated 17-07-2023. Necessary entry in this effect may please be made in Service Book under proper attestation.
2. The District Accounts Officers concerned for information.
3. Mr. Muhammad Alam Khan Junior Technician Pharmacy (BPS-12) Central Jail Colony District D.I.Khan for information.
4. Confidential Clerk for placing a copy of the said order in his character roll.

1272  
5-8-23

*Muhammad, Hanis*

**DEPUTY DIRECTOR(E)  
INSPECTORATE GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR**



32

INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No. 1

Dated 02-06-2023

To,

The Director Information,  
Khyber Pakhtunkhwa Peshawar

Subject: NOTICE FOR WILLFUL ABSENCE FROM DUTY

Sir,

I am directed to refer to the subject and forward herewith seven copies of the notice in Urdu version for publication in two daily leading Newspapers. Funds to meet the expenditure are available during the current financial year 2022-23.

ASSISTANT DIRECTOR(E)  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

Endst: No. 7-3520 - 21 I-WE

Copy of the above alongwith a copy of Urdu version notice is forwarded to:

1. The Superintendent Central Prison D.I.Khan for information with reference to his letter No.3286/WE dated 01-06-2023.
2. Muhammad Alam Junior Technician Pharmacy. P/O, Central Jail Colony D.I.Khan for information with reference to this office registered notice No. 9/2-J-2011-17819 dated 10-05-2023.

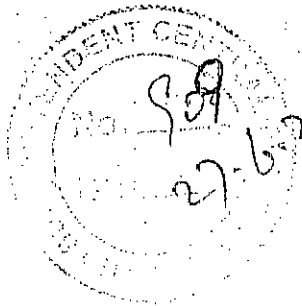
ASSISTANT DIRECTOR(E)  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

D/K

P.B.

For information

attached to be  
tuned by  
M. Alam



برگاہ سے آپ سہی محمد عالم، جو نیئر ٹیکنیشن، فارمی سنٹرل جیل کالونی ڈیرہ اسماعیل خان، مورسہ 17-03-2023 سے اپنی ڈیوٹی اور دفتر سے تاحال غیر حاضر ہو۔ آپ کو دفتر انسپکٹر جنرل جیل خانہ جات خیبر پختونخواہ کی طرف سے آپ کے گھر کے پتہ پر رجسٹرڈ نوٹس نمبر 17819 مورسہ 10-05-2023 غیر حاضری ارسال کیا گیا۔ جس میں آپ کو ہدایت کی گئی کہ آپ جلد از جلد سنٹرل جیل ڈیرہ اسماعیل خان میں ڈیوٹی پر حاضر ہو جائیں۔ اور اپنی غیر حاضری کی مقبول وجوہیاں کریں لیکن پندرہ دن گزرنے کے باوجود آپ ڈیوٹی پر حاضر نہیں ہوئے اور فوٹو کاپیاں میڈیکل ریست سٹیشن کیپٹ از 03-2023-17-25-05-2023 تک پیش کئے اور اس کے بعد تاحال اپنی ڈیوٹی سے بغیر کوئی اطلاع غیر حاضر ہو۔

ابھی آڑی بار بذر ایچ نوٹس ہذا آپ کو متنبہ کیا جاتا ہے کہ آپ اس نوٹس کی اشاعت کے 15 دنوں کے اندر اندر سنٹرل جیل ڈیرہ اسماعیل خان میں پریزنٹ جیل کے روبرو پیش ہو کر اظہار وجوہ برائے غیر حاضری پیش کریں کہ کیوں نہ آپ کے خلاف تادیبی کارروائی کی جائے۔ عدم تعمیل کی صورت میں آپ کے خلاف قاعدہ نمبر 09 انضباطی و ضوابطی مجریہ 2011ء کے تحت یکطرفہ کارروائی عمل میں لائی جائیگی۔ جو آپ کی ملازمت سے برخاستگی پر منتج ہو سکتی ہے۔

MA  
 (محمد اسحاق محسود)  
 All

OK

انسپکٹر جنرل جیل خانہ جات خیبر پختونخواہ پشاور

Attended to be  
 true copy  
 M. Akbar

To,

The Worthy Additional Chief Secretary,  
Home & Tribal Affairs Department,  
Khyber Pakhtunkhwa Peshawar.

34 Annex  
"D"

Subject:- APPEAL FOR RESTORATION INTO GOVERNMENT SERVICE.

Respected Sir,

Kindly refer to Inspector General of Prisons Khyber Pakhtunkhwa Peshawar order No. 31729 dated 31.08.2023 received on 05.09.2023.

With due respect, I would like to submit that I was enrolled in the Prisons Department as a Junior Pharmacy Technician on October 14, 2011. Since my induction into the Department, I have performed duties in various locations within the province, including District Jail Lakki Marwat, Sub Jail Tank, Wana, and Central Prison DI Khan, with great zeal and zest. I maintain a crystal-clear record, as evidenced by my service record (a copy of which is attached as Annex-A).

The appellant submit the following points in my defence:-

01. That since my induction into government service, I have never been absent from my assigned duties without prior permission from my superiors, as evidenced by my service record.
02. That the appellant has never enjoyed any kind of leave throughout the entire length of service, which can be verified from my service record as well.
03. That I performed my duties with dedication, honesty, and efficiency. I did not exhibit any sluggishness in discharging my duties, and neither did any officers, officials, nor any prisoners raise any complaints before the Superintendent or at any other forum in any of the jails to which I was assigned for duty. The appellant's claim can be verified by the Superintendent of those jails.
04. That I am a law-abiding citizen of Pakistan and well-versed in the rules and regulations of Khyber Pakhtunkhwa Prisons Rule 2018. I have never indulged in unlawful activities.
05. The appellant was diagnosed as a patient with diabetes, hypertension, and high blood pressure, which prevented the appellant from performing duties regularly and efficiently. The appellant's health condition was deteriorating day by day.
06. That on the advice of the doctor to achieve mental tranquility and calmness, I opted for medical leave. The medical leave prescriptions from DHQ

Mental  
Trans  
05.  
MSA

DIKhan, effective from March 27, 2023, to August 30, 2023, are enclosed for your kind consideration and perusal (Annex B). The appellant is still under treatment.

07.

That the competent authority, i.e., the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar, did not call the appellant for a personal hearing and instead removed the appellant from service without considering the medical rest prescriptions as genuine, legitimate, and lawful. This action further demoralized the appellant. (A copy of the removal order is enclosed as Annex-C).

08.

That the bed rest/medical leave of the appellant for the period from March 27, 2023, to August 30, 2023, may be considered as leave with full average pay, as the appellant has a sufficient number of days of leave to his credit. Therefore, it is humbly requested that, considering the above explanations, the appellant may be graciously reinstated into service to enabling me to continue my job as well as my treatment, please.

I shall be thankful to your gracious consideration and act of kindness.

Dated: 22/09/2023

Yours Sincerely,

Muhammad Alan  
Junior Pharmacy Technician  
Basti Darkhana Wali DIKhan.  
Ph#: 0333-486155

*Attendant to be  
taken copy  
M. Alan*



6-B  
Rafiq

INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No. 9/2 J-211-44357-1-WE

Dated 29-11-2023

36  
ANNI  
D/I

To,

The Superintendent,  
Central Prison D.I.Khan

Subject: APPEAL FOR RESTORATION INTO GOVERNMENT SERVICE / ORDER  
Memo;

I am directed to refer to this office endorsement No. 37913-14 dated 16-10-2023 on the subject and to forward herewith a copy of Home Department order No. SO(Prison-I)/HD/8-3/KC/2023 dated 23-11-2023 on the captioned subject (self-explanatory) for information and necessary action.

Please inform the Ex-Official concerned accordingly.

DEPUTY DIRECTOR(E)  
INSPECTORATE GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

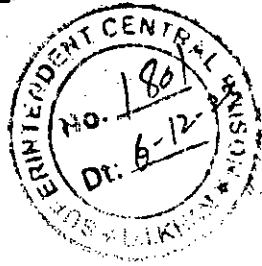
Endst.No. \_\_\_\_\_ /-

Copy of the above is forwarded to the Additional Chief Secretary to the Government of Khyber Pakhtunkhwa Home & TA's Department for information with reference to Home Department order No. referred to above please.

DEPUTY DIRECTOR(E)  
INSPECTORATE GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

D/S  
P.B. Q  
For matters

T-12-11-2023  
M. Akram





Government of Khyber Pakhtunkhwa  
Home & Tribal Affairs Department

Dated. 23<sup>rd</sup> November, 2023

37

**ORDER:**

**WHEREAS**, Mr. Muhammad Alam, Junior Technician Pharmacy attached to Central Prison D.I Khan was awarded the major penalty of "Removal from service" by Inspector General of Prison Khyber Pakhtunkhwa Peshawar vide order No. 9/2-J-2011-31709 dated 31-08-2023 due to his willful absence w.e.f. 27.03.2023 till the date of his Removal from service.

P-222

**AND WHEREAS**, the said Junior Technician Pharmacy preferred his departmental appeal for setting aside the penalty awarded to him and also requested for reinstatement into the service.

**NOW THEREFORE**, the appellate authority, after examination of his previous record of punctuality and performance, his health condition and all available record, has been pleased to convert the penalty regarding his removal from service into compulsory Retirement from service.

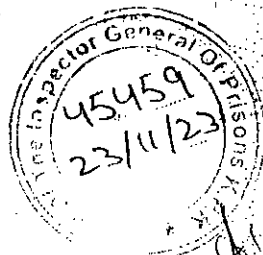
**ADDITIONAL CHIEF SECRETARY  
GOVERNMENT KHYBER PAKHTUNKHWA,  
HOME & TRIBAL AFFAIRS DEPARTMENT.**

Endst No. SO(Prison-I)HD/8-3/KC/2023

dated 23.11.2023

Copy of the above is forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information and necessary action.
3. PS to Additional Chief Secretary, Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar for information.
4. Mr. Muhammad Alam, Junior Technician Pharmacy Central Prison D.I Khan.



**SECTION OFFICER (PRISON-II)**

*W.A.*  
*23/11/23*  
*M. Alam*

*20/11/23*



Dated. 23<sup>rd</sup> November, 2023

**ORDER:**

WHEREAS, Mr. Muhammad Alam, Junior Technician Pharmacy attached to Central Prison D.I Khan was awarded the major penalty of "Removal from service" by Inspector General of Prison Khyber Pakhtunkhwa Peshawar vide order No. 9/2-J-2011-31709 dated 31-08-2023 due to his willful absence w.e.f. 27-03-2023 till the date of his Removal from service.

AND WHEREAS, the said Junior Technician Pharmacy preferred his departmental appeal for setting aside the penalty awarded to him and also requested for reinstatement into the service.

NOW THEREFORE, the appellate authority, after examination of his previous record of punctuality and performance, his health condition and all available record, has been pleased to convert the penalty regarding his removal from service into compulsory Retirement from service.

ADDITIONAL CHIEF SECRETARY  
GOVERNMENT KHYBER PAKHTUNKHWA,  
HOME & TRIBAL AFFAIRS DEPARTMENT.

Endst No. SO(Prison-I)HD/8-3/KC/2023

dated 23.11.2023

Copy of the above is forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
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3. PS to Additional Chief Secretary, Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar for information.
4. Mr. Muhammad Alam, Junior Technician Pharmacy Central Prison D.I Khan.

  
SECTION OFFICER (PRISON-I)

23/11/23

*Muhammad Alam  
Junior Technician  
M. Alam*





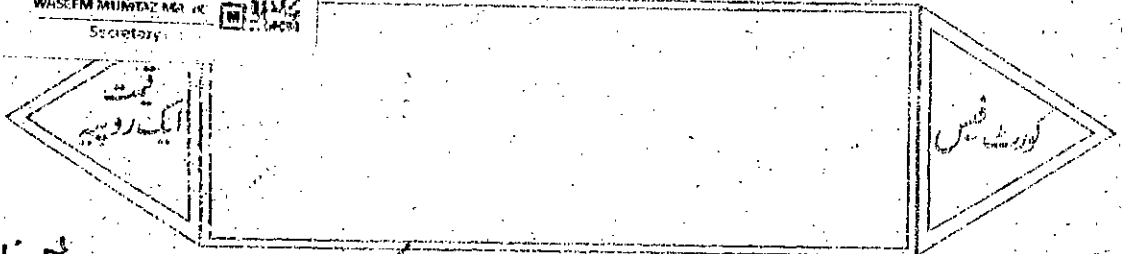
IFTIKHAR-UL-HAQ  
Advocate Supreme Court of Pakistan  
12201-0316740-9

President  
M. AHSAN BIRDO

Secretary  
WASEEM AHMAD

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# وکالت نامہ



بعد ازاں جناب صاحب محترم خواہ سردار سر سید محمد کوثر صاحب کے لئے

مخاطب ایڈوانس  
مقام ان کے دربار آف پولیس ٹھکانہ

سروس ایبل

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

یہ عہد نامہ تحریر کیا گیا ہے

مقررہ شدہ راجہ بالا عنوان میں اپنی طرف سے جو اسٹےٹوٹری اور دیگر اسٹیٹوٹری کے پیش یا تصدیق مقدمہ تمام D.O.K کیلئے  
مخبر افستہ اور الحی ایڈوانس

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں برائے حق اور برائے عدالت حاضر ہوں گا اور ہر وقت پکارے جانے کے مقصد وکیل صاحب  
موجود اور ایڈوانس دیکھ کر حاضر ہوں گا، اگر کوئی اور شخص یا شخصوں نے میری جگہ پر میرے برائے عدالت ہونے کا صاحب سے  
ایک کی طرف سے وارنٹ ہونے کے لئے وکیل صاحب سے درخواست کی ہے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
ذمہ دار ہونے کے لئے وکیل صاحب سے درخواست کی ہے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
ہونے کے لئے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے ذمہ دار ہونے کے لئے وکیل صاحب سے درخواست کی ہے  
اور یا اس کے واسطے کسی معاہدے کے ادا کرنے یا چھوڑنے کے لئے کسی معاہدے کے ادا کرنے کے لئے وکیل صاحب سے درخواست کی ہے  
ذات خود منظور قبول ہوگا اور صاحب سے درخواست کی ہے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
بھی اختیار ہوگا اور کسی معاہدے کے ادا کرنے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
مطلب کرنے اور قبول دعویٰ کا بھی اختیار ہوگا اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
مقدمہ یا استغاثہ کی تکمیل اور درخواست کے ادا کرنے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
اور تمام شرائط پر مقدمہ کی تمام شرائط کے مطابق میں نے اپنے ذمہ دار ہونے کے لئے وکیل صاحب سے درخواست کی ہے  
کی کارروائی یا صورتوں سے درخواست کی ہے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
میں ہر امر میں ہیں اور وکیل صاحب سے درخواست کی ہے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
موجود کا حق ہے اور صاحب سے درخواست کی ہے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے  
صورت میں ہر امر کوئی مطالبہ کر کے یا کسی معاہدے کے ادا کرنے اور مقدمہ کی تمام شرائط کے مطابق میں نے اپنے

3 / 2024

مخبر افستہ اور الحی ایڈوانس

Attached  
Accepted  
M. Khan  
sh. aff. Iftikhar ul-Haq

M. Khan  
CNIL NO. 12101-24, 81131-9  
M/NO. 0333-4861555  
0346-7854107