

Form-A

FORM OF ORDER SHEET

Court of Khyber Pakhtunkhwa Service Tribunal Peshawar

Service Appeal No. 342/2024

Sr. No. Date of Order or other proceedings with signature of judge
 order
 proceedings

2.

3.

4.3.2024

The appeal of Hayat Muhammad resubmitted today by Mr. Jawad Khan advocate. It is fixed for hearing before Single Bench Bench at Peshawar on 05/03/2024. Parcha Peshi is given to counsel for the applicant.

By the order of Chairman

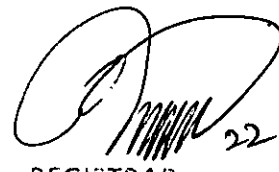

REGISTRAR

The appeal of Mr. Hayat Muhammad received today i.e on 21.02.2024 is incomplete in the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days

- 1. According to the provision of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.
- 2. Appeal has not been flagged/marked with annexures
- 3. The material of appeal is not signed by the appellant.
- 4. Annexures of the appeal are unattested.
- 5. Check list is not attached with the appeal.
- 6. Address of appellant is incomplete be complete according to the rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No 401 / 15 T.


22/02/2024

 22/2/24

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR

10/10/2024
10/10/2024

Objections removed, Phone No of appellant is 0301-8861469. Whereas address is correct. Further, the respondent No1 being un-necessary party as per the objection slip, he considered deleted.

Counsel  22/2/2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No 342/2024

Hayat Muhammad.....(Appellant)

VERSUS

Secretary Transport and Mask Transit.....(Respondent)

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Appellant
Through: Jawad Khan
Advocate High Court
(JAWAD KHAN)

&

Muhammad Ilyas
(MUHAMMAD ILYAS)
Advocates,
High Court, Peshawar
Cell # 0321-5778557

Dated: 14 -02-2023

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No 342/2024

Hayat Muhammad S/O Shal Muhammad (Retired Superintendent
BPS-17) Regional Transport Authority Peshawar) R/O Bashir Abad
Tehsil and District Peshawar (CNIC # 17301-1572461-
3).....(Appellant)

VERSUS

Secretary Transport and Mass Transit, Khyber Pakhtunkhwa,
Peshawar.....(Respondent)

Service Appeal under Section 4 of the Khyber
Pakhtunkhwa Service Tribunal Act, 1974 against
the impugned order dated 27-06-2023; whereas
the said order is illegal, incorrect, wrong,
against the law, fact and circumstances and
against the principles of natural justice, hence
not maintainable and liable to be set aside

PRAYER IN THIS APPEAL:-

The Appellant humbly prayed that on acceptance of this
appeal in hand, the impugned order dated 27-06-2023 may
kindly be set aside and the Petitioner/Appellant may be
retired as per the decision of the Standing Medical Board on
the medical ground instead of the superannuation period

②

alongwith all the back benefit as provided to the Appellant by law.

Respectfully Sheweth:-

Facts followed by grounds giving rise to the instant service appeal are submitted hereunder:-

- 1) That the Appellant was appointed in the Respondent department i.e. Transport Department on 08-05-1984 as Naib Qasid. (Copy of the initial appointment order is hereby attached as Annex 'A').
- 2) That the Appellant performed his official duty with full zeal and honesty and got promotions at various stage of his service.
- 3) That in the year 2002, he was diagnoses as the patient of heart disease and in 2021 sustained stroke and brain hembridge, due to which the Appellant got paralyzed and faced hurdles to perform his duty. In the light of same he applied for pre-mature retirement on medical grounds. The application/case of the Petitioner/Appellant was referred to the Standing Medical Board for its opinion. The Standing Medical Board forwarded its opinion to the Respondent No 1 with the suggestion that the Appellant is unable to perform his duty and may be retired on medical ground. (Copy of the relevant record is attached is attached as Annex 'B').
- 4) That the Respondent No 1 rejected the opinion of the Standing Medical Board and impugned order dated 27th June, 2023 was passed through which the Appellant was

retired on the ground of attaining the age of superannuation instead of medical grounds.

- 5) That feeling aggrieved from the said order, the Appellant instituted a writ petition No 3148-P/2023, which was dismissed on the ground of lack of jurisdiction. The Appellant was directed to prefer a departmental appeal and to preferred appeal before this Tribunal. The order of High Court dated 24-10-2023 and attested copies are hereby attached as Annex 'C').
- 6) That, thereafter, the Appellant moved/preferred departmental appeal before the Respondent No 1, but still no relief, whatsoever, has been granted to the Appellant not the departmental appeal is considered. (Copy of the appeal is hereby attached as Annex 'D').
- 7) That, feeling aggrieved, the Appellant was left with no other remedy except to invoke the jurisdiction of the Honourable Tribunal on the following grounds *inter-ália*:-

GROUNDS: -

- A) That the impugned order dated 27-06-2023 is illegal, incorrect, wrong, against the law, facts and circumstances, hence not maintainable and is liable to be set aside.
- B) That the said order dated 27-06-2023 is unlawful, without any legal authority, ineffective upon the rights of the Appellant and against the rules.
- C) That the Respondent No 1 is not supposed to ignore the findings of the Standing Medical Board.

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- D) That all the employees, who were declared unfit on medical grounds were retired on the same ground, but the Appellant was not retired on the said ground, hence a case of discrimination.
- E) That the Respondent No 1 has not considered the opinion of the Standing Medical Board, hence misreading and non-reading.
- F) That the appeal of the Appellant is well within time and not time barred. Further, the Appellant has fulfilled all the legal requirements, thus maintainable in the eyes of law.
- G) That the Appellant be treated as per the law, as this basic, fundamental right.
- H) That other legal ground would be raised at the time of arguments with the prior approval of this Honourable Tribunal.

It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, the following relief may kindly be granted in favour of the Appellant.

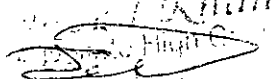
- i. To set aside the impugned order dated 27th June, 2023.
- ii. To retire the Appellant on medical grounds instead of retirement on the ground of superannuation.
- iii. To declare the right of the Appellant to be retired on medical grounds.
- iv. To award all the benefits as per the rules and law.


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v. Any other relief, if any, may also graciously be granted.


Appellant
(Hayat Muhammad)

Through:

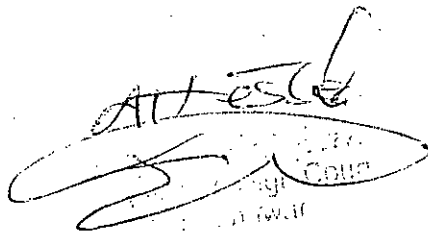

(JAWAD KHAN)
&


(MUHAMMAD ILYAS)
Advocate,
High Court, Peshawar

Dated: 14-02-2024

CERTIFICATE:-

No such like service appeal has previously been filed before this Honourable Service Tribunal except the instant one


Stamp: SERVICE TRIBUNAL
PESHAWAR

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

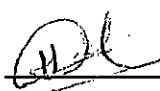
Hayat Muhammad.....(Appellant)

VERSUS

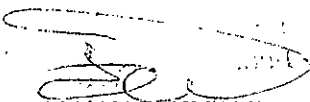
Secretary Transport and Mask Transit.....(Respondent)

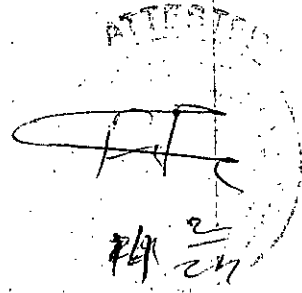
AFFIDAVIT

I, Hayat Muhammad S/O Shal Muhammad (Retired Superintendent BPS-17) Regional Transport Authority Peshawar R/O Bashir Abad Tehsil and District Peshawar (CNIC # 17301-1572461-3, do hereby solemnly affirm and declare on oath that all the contents of accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed OR with-held from this Honourable Court.

DEPONENT 
CNIC # 17301-1572461-3
Cell # 0301-8861469

Identified by:-


(JAWAD KHAN)
Advocate
High Court, Peshawar



①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Hayat Muhammad.....(Appellant)

V E R S U S

Secretary Transport and Mask Transit.....(Respondent)

Application for suspension of impugned order
dated 27-06-2023 against the Appellant till
the final disposal of the accompanied appeal.

Respectfully Sheweth: -

- 1) That the above titled case is instituted today, which is not yet fixed for hearing.
- 2) That the case of the Appellant is based on strong documentary and oral evidence, which is likely to be decided in his favour being a strong prima facie.
- 3) That balance of inconvenience lies in favour of the Appellant.
- 4) That if the impugned order dated 27-06-2023 was not suspended, it would cause irreparable loss.

It is, therefore, respectfully prayed that on acceptance of this Application, the order dated 27-06-2023 be suspended till the disposal of the accompanied appeal.

Through:


Appellant


(JAWAD KHAN)

&


(MUHAMMAD ILYAS)

Advocates,
High Court, Peshawar

Dated: ~~19~~ 02-2024

(S) (8)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR


Hayat Muhammad.....(Appellant)

V E R S U S

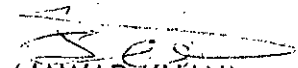
Secretary Transport and Mask Transit.....(Respondent)

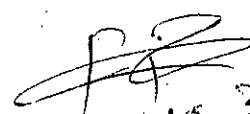
AFFIDAVIT

I, Hayat Muhammad S/O Shal Muhammad (Retired Superintendent BPS-17) Regional Transport Authority Peshawar R/O Bashir Abad Tehsil and District Peshawar (CNIC # 17301-1572461-3, do hereby solemnly affirm and declare on oath that all the contents of accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed OR with-held from this Honourable Court.

DEPONENT 
CNIC # 17301-1572461-3
Cell # 0301-8861469

Identified by:-


(JAWAD KHAN)
Advocate
High Court, Peshawar


14/2/21

9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Hayat Muhammad.....(Appellant)

VERSUS

Secretary Transport and Mask Transit.....(Respondent)

ADDRESSES OF THE PARTIES

APPELLANT

Hayat Muhammad S/O Shal Muhammad (Retired Superintendent
BPS-17) Regional Transport Authority Peshawar) R/O Bashir Abad
Tehsil and District Peshawar (CNIC # 17301-1572461-3)

RESPONDENT

Secretary Transport and Mask Transit, Khyber Pakhtunkhwa,
Peshawar

Through:


Appellant


(JAWAD KHAN)

&


(MUHAMMAD ILYAS)

Advocates,
High Court, Peshawar

Dated: -~~22~~02-2024

10

OFFICE ORDER

No. _____/PTA In exercise of the powers conferred under 5/10.4 of Rule 4 of the MFP Civil Servants (Appointment, Promotion and Transfer) Rules 1975, Mr. Nayat Mohammad S/o. Sidh Khannad, Resident village Kardana (Pali Dubandi) Tehsil Charsadda District Peshawar is appointed as High Constable in the Office of the Provincial Transport Authority, MFP Peshawar temporarily with immediate effect.

(MIAN NASEEM-U-HAQ KAKASHI)
Secretary
Provincial Transport Authority
MFP, Peshawar.

2113-15 5/8/82
No. _____/PTA

A copy is forwarded to:-

1. The Accountant General MFP Peshawar
Accounts Branch, P.T.A.
2. Mr. Nayat Mohammad S/o Sidh Khans and Pali Dubandi P.O. Tehsil Charsadda District Peshawar.
- 3.

(Signature)
Secretary
Provincial Transport Authority
MFP, Peshawar.

(Signature)
Associate High Court
Peshawar

BETTER COPY of page No. 8

To,

The secretary to Govt of Khyber Pakhtunkhwa,
Transport & Mass Transit Department Peshawar.

Through: Proper Channel.

Subject: APPLICATION FOR GRANT OF PRE-MATURE RETIREMENT ON
MEDICAL GROUND

Respected sir

With humble submission it is submitted that I was appointed in Transport Department on 08-05-194. My date of birth is 12-06-1963. At present I am working as superintendent (BS-17) in the office of regional transport authority Mardan. I am suffering from chronic disease i.e. depression, hypertension and cardiac patient. I was also paralyzed during 2021. Unfortunately, in the month of September 2022, I faced heart attack and hospitalized in post graduate medical institute lady reading hospital Peshawar where I was stented. The medical treatment documents are attached. I am still not feeling well and facing difficulty in performing of my official duties. There is risk to my life.

In view of above mentioned facts, it is requested that I may very kindly be granted retirement on medical ground under the Government policy with immediate effect so that to save my life.

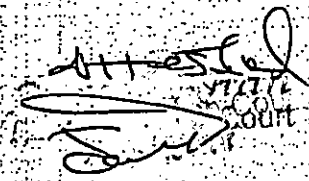
I shall pray for your long life and prosperity.

Your Faithfully,

Date 31-10-2022

(Hayat Muhammad)

Superintendent, Regional Transport
Authority, Mardan


Mardan
Court

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Large handwritten scribble or signature in the upper middle section.

Yours faithfully,
(Major Muhammad)
Superintendent (Legal Transport
Authority, Madras)

Date: 31/11/2022

I shall pray for your long life and prosperity.

my life
reliefment on medical grounds under the Government Policy will immediate effect so that to safe
in view of above mentioned facts, it is requested that I may very kindly be granted
my official duties. There is no in my life
treatment documents are attached. I am still not feeling well and facing difficulty in performing of
Graduate Medical Institute (Madras) (Hospital) Chennai where I was joined. The medical
admission, in the month of September, 2022, I faced heart attack and hospitalized in Post
graduate Institute for depression, hypertension and cardiac patient. I was also paralyzed during 2021
Superintendent (B.S. 17) in the office of Regional Transport Authority, Madras. I am suffering from
with multiple ailments. It is submitted that I was appointed in transport
Specialist

Subject: APPLICATION FOR GRANT OF SICK LEAVE ON MEDICAL GROUNDS

The Secretary to Govt. of Railways, Madras

(11)

Annexure B

(8)



OFFICE OF THE
MEDICAL SUPERINTENDENT
SERVICES HOSPITAL, PESHAWAR

Phone: (011) 2701000, 2701001, 2701002 Fax: (011) 2701004

Dated 22/05/2023

83/c-11 MS:SAHR/2021-22

Transport & Motor Transit Department
Khyber Pakhtunkhwa
Peshawar

Subject: STANDING MEDICAL BOARD

Memorandum: With reference to your office letter No. SO(E)/TD/2-61/Retd/Pension/2022 dated 05-01-2023 addressed to Director General Health Services Khyber Pakhtunkhwa on the subject noted above.

Mr. Hayat Superintendent was examined by the Standing Medical Board of this office on 13/03/2023. The proceedings of the Standing Medical Board are sent herewith for necessary action.

Chairman
Standing Medical Board
Medical Superintendent
Police/Service Hospital
Peshawar

Copy to: Director General Health Services Khyber Pakhtunkhwa Peshawar for information with reference to his letter No. 6262-63/Medical/SMB Dated: 13/03/2023.

Handwritten signature
High Court

BETTER COPY of page No. 9

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OFFICE OF THE MEDICAL SUPERINTENDENT
SERVICES HOSPITAL PESHAWAR

No. 8310-11/MS/SMB/2021-22

Dated 22-03-2023

Section officer (Admin)
Transport & Mass Transit Department
Khyber Pakhtunkhwa
Peshawar

Subject: STANDING MEDICAL BOARD

Memo: With reference to your office letter No. SOETD/2-61/Retd/2022 dated 05-01-2023 addressed to Director General Health Services Khyber Pakhtunkhwa on the subject noted above.

Mr. Hayat Superintendent was examined by the Standing Medical Board held in this office on 15-03-2023. The proceedings of the Standing Medical Board are sent herewith for further necessary action.

Chairman

Standing Medical Board

Medical Superintendent

Police/Service Hospital

Peshawar

Copy to

- Director General Health Services Khyber Pakhtunkhwa Peshawar for information with reference to his letter No. 6262-63/Medical/SMB Dated 13-03-2023

Handwritten signature

OFFICE OF THE CHAIRMAN, STANDING MEDICAL BOARD, MEDICAL SUPERINTENDENT, POLICE/SERVICES HOSPITAL PESHAWAR

The Standing Medical Board comprising following members assembled at the office of the Medical Superintendent, Police Services Hospital Peshawar to examine Mr. Hayat Superintendent.

The Standing Medical Board is of the opinion that patient is a known case of Ischemic Heart Disease and angiography done at (12/1/23) was reported to Civil Services Hospital Peshawar where of the opinion that ECG shows ST-T changes suggestive of ECG shows concentric LVH/CD/MI. The patient is unable to continue his Government and may be boarded on medical grounds.

STATION PESHAWAR
DATED: 15/03/2023

(Dr. Niaz Muhammad)
Chairman
Standing Medical Board
Medical Superintendent
Police Services Hospital
Peshawar

(Dr. Muhammad Jamil)
Cardiologist
Police Services Hospital
Peshawar Member

(Dr. Asif Iqbal)
Physician
Police Services Hospital
Peshawar Member

(Dr. Kamran Khan)
Orthopedic Surgeon
Standing Medical Board
Police Services Hospital Peshawar

(Dr. Aurangzeb Afridi)
DMS Secretary
Standing Medical Board
Peshawar Member

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Khan

OFFICE OF THE CHAIRMAN STANDING MEDICAL BOARD/MEDICAL SUPERINTENDENT POLICE / SERVICES HOSPITAL PESHAWAR

The standing Medical Board comprising the following members assembled in the office of the medical superintendent police/service hospital Peshawar to examine Mr. Hayat superintendent.

The standing Medical Board is of the opinion that patient is a known case of Ischemic heart disease and angiography done. The patient was referred to cardiologist Services Hospital Peshawar who is of the opinion that ECG shows STT changes in all leads and ECHO shows Concentric LVH/LVDD/MR the patient is unable to continue his Government job and may be boarded out on medical grounds.

STATION PESHAWAR

DATED 15-03-2023

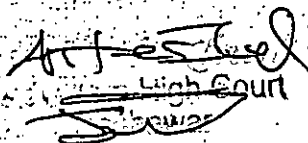
Dr. Niaz Muhammad
Chairman
Standing Medical Board
Medical superintendent
Police Service hospital
Peshawar

Dr. Muhammad Jamil
Cardiology
Police Services Hospital
Peshawar member

Dr. Asif Izhar
Police Services Hospital
Peshawar member

Dr. Kamran Khan
Orthopedic Surgeon
Standing Medical Board
Police Services Hospital
Peshawar

Dr. Aurangzeb Afridi
DMS/Secretary
Standing Medical Board
Peshawar member


Asif Izhar
Police Services Hospital
Peshawar



(11)

14

GOVERNMENT OF KHYBER PAKHTUNKHWA
TRANSPORT & MASS TRANSIT DEPARTMENT

Ph: 091-9211782 No: SO(E)/TD/2-61/Retirement/Pension/2019-20
Fax: 091-9212536 Dated Peshawar: - 27.06.2023 / 11253

NOTIFICATION:

NO: SO(E)/TD/2-61/Retirement/Pension: In pursuance of Section 13(1) of the Khyber Pakhtunkhwa Civil Servant Act 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), Mr. Hayat Muhammad, Superintendent (BPS-17) Regional Transport Authority, Peshawar shall stand retired from Government Service on 11.06.2023 (A.M.) on attaining sixtieth (60th) year of age. His date of birth is 12.06.1963.

2. In terms of provision of Rule-20 of the Khyber Pakhtunkhwa, Civil Servants Revised Leave Rules, 1981 and Instructions issued from time-to-time sanctions also hereby accorded to the grant of leave encashment of 365 days pay in lieu of LFP in respect of the aforesaid retiring officer.

3. As per official record Mr. Hayat Muhammad was born on 12.06.1963 and enter into government service on 05.08.1984.

-sd-

SECRETARY
TRANSPORT & MASS TRANSIT
DEPARTMENT KHYBER PAKHTUNKHWA

Endst. No. & date Even.

A copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa
2. Secretary, Provincial Transport Authority, Khyber Pakhtunkhwa
3. Secretary, Regional Transport Authority, Peshawar.
4. PS to Secretary Transport & Mass Transit Department, Khyber Pakhtunkhwa.
5. PA to Director Transport, Khyber Pakhtunkhwa.
6. PA to Deputy Secretary (Admin), Transport & Mass Transit Department.
7. Officer concerned.
8. Master file.

(HAZ RAHIM)
SECTION OFFICER (ESTD)

Peshawar

BETTER COPY of page No. 11

**GOVERNMENT OF KHYBER PAKHTUNKHWA
TRANSPORT & MASS TRANSMIT DEPARTMENT**

Ph: 091-9211782
Fax: 091-9212556

No. SO/TD/2-61/Retirement/Pension/2019-20
Dated Peshawar 27-06-2023

NOTIFICATION:

No. SO(E)/TD/2-61/Retirement/Pension: in pursuance of section 13(1) of the Khyber Pakhtunkhwa civil servant act 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973). Mr. Hayat Muhammad, Superintendent (BPS-17) Regional Transport Authority Peshawar shall stand retired from Government Service on 11-06-2023 (A.N) on attaining sixtieth (60th) year of age. His date of birth is 12-06-1963.

2. In the terms of provision of Rule-20 of Khyber Pakhtunkhwa civil servants revised leave rules 1981 and instruction issued from time-to-time sanction is also hereby accorded to the grant of leave encashment of 365 days pay in lieu of LPR in respect of the aforesaid retiring officer.

3. As per official record MR. Hayat Muhammad was born on 12.06.1963 and enter into government service on 05.08.1984.

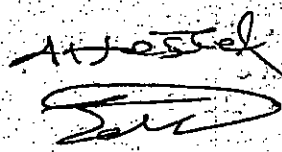
Sd/
Secretary
Transport & Mass Transit
Department Khyber Pakhtunkhwa

Endst No & date Even

A copy is forwarded to the

1. Accountant General Khyber Pakhtunkhwa
2. Secretary Provincial Transport Authority Khyber Pakhtunkhwa
3. Secretary Regional Transport Authority Peshawar
4. PS to Secretary Transport & Mass Transit Department Khyber Pakhtunkhwa
5. PA to Director Transport Khyber Pakhtunkhwa
6. PA to Deputy Secretary (Admn) Transport & Mass Transit Department
7. Officer Concerned
8. Master File

Ijaz Rahim
Section officer (ESTY)



(18)

(15)

9. Note for Chief Secretary, Khyber Pakhtunkhwa moved by Transport & Staff Transport Department regarding retirement of Mr. Hayat Muhammad, Superintendent (BS-17) in government service on medical ground was earlier examined and returned to Administrative Department with observation vide Para 6-7 of the Note. In response, the Administrative Department vide Para-8 a/c has clarified the observation.

10. Following are the service details of the officer:

S.No.	Information	Status
1.	Name	Hayat Muhammad
2.	Service Group/Cadre	Superintendent (BS-17)
3.	Date of Birth	12-06-1961
4.	Date of final retirement	15-03-2023
5.	Age of the applicant	59 years 09 Months & 13 days
6.	Nature of retirement	Retirement on Medical Ground
7.	Disciplinary proceedings/pendency	The Administrative Department vide Para-3 of the Note has certified that no Departmental/NAI and Anti-Corruption proceedings are pending against him (Annex-IV)
8.	Total length of service	38 years
9.	Competent Authority	Chief Secretary, Khyber Pakhtunkhwa

29344

11. Since the Standing Medical Board has declared the officer unfit for further service (Annex-II) therefore the Chief Secretary, Khyber Pakhtunkhwa being competent authority in terms of Rule-10(h) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules-1989 (Annex-VII) read with Rule-6(4) of the Khyber Pakhtunkhwa Civil Servants Pension Rules-2021 (Annex-IX) may approve retirement of the officer w.e.f. 15-03-2023.

(Altaf Saeed Faruq)
Secretary Establishment
19 June 2023

Chief Secretary, Khyber Pakhtunkhwa

The file is already closed and no further action is required.

Saeed Faruq

(Signature)

1331

(Signature)
Advocate High Court
Shawar

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BETTER COPY of page No. 12

9. Note for Chief Secretary, Khyber Pakhtunkhwa moved by Transport & Mass Transit Department regarding retirement of Mr. Hayat Muhammad. Superintendent (BS-17) from government service on medical ground was earlier examined and returned to Administrative Department with observation vide Paras 6-7 of the Note. In response, the Administrative Department vide Para-8 ante has clarified the observation.

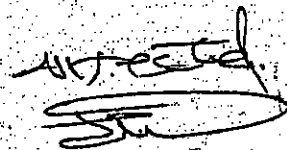
10. Following are the service details of the officer:

S.No	Information	Status
1.	Name	Hayat Muhammad
2.	Service Group Cadre	Superintendent (BS-17)
3.	Date of Birth	12-06-1963
4.	Date of pre mature retirement	15-03-2023
5.	Age of the applicant	59 years, 09 Months & 13 days
6.	Nature of retirement	Pre-mature Medical Ground
7.	Disciplinary proceeding pendency	The Administrative Department vide Para-3 of the Note has certified that no Departmental/NAB and Anti-Corruption proceedings are pending against him (Annex-IV).
8.	Total length of service	38 years
9.	Competent Authority	Chief Secretary, Khyber Pakhtunkhwa

11. Since the Standing Medical Board has declared the officer unfit for further service (Annex-III), therefore, the Chief Secretary Khyber Pakhtunkhwa, being competent authority in terms of Rule-4(1)(b) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 (Annex-VII) read with Rule-6(4) of the Khyber Pakhtunkhwa Civil Servants Pension Rules, 2021 (Annex-IX) may approve retirement of the officer w.e.f. 15-03-2023.

S/d

Akhtar Saeed Truk
Secretary Establishment
07th June 2023



SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KP/K
OPD REGISTRATION

MRN _____
 From _____
 Date _____

Name: DAYAL SUDHAKAR Age: 61 Sex: MALE

Department: GENERAL OPD Address: PESHAWAR

Hospital Yearly No. _____ Dated: 22-09-2022

History: RI
low cardiac output

Clinical Examination: Regin Cardiac
dry @
dry / 10/20
Acute Aortic

Provisional Diagnosis: M. 200/110
diff to fasting
one hospital of
from Mx

Investigations: Adm
all / 10

In Balance	
In Adjusted	
Debit	Credit
0.000	0.0
0.000	0.

Doctor on Duty _____ Doctor's Signature _____

[Handwritten Signature]

(14)

(17)

MR No: K025022759899
 Name: HAYAT MUHAMMAD
 Age: 22-SEP-05 (17 Years)
 Sex: Male
 Height (cm):
 Weight (kg):
 Ref: C8103 - PCI DESI STENT
 Indications:

Visit Date: 22-SEP-22
 Referred by:
 IP/OP: IPD
 Report Date: 22-SEP-22
 Weight (Kg):
 Medical History:
 Medications:

PROCEDURE

Target Lesion: proximal LAD

Approach: RRA

Procedure:

8:30 used to engage LCA. BMW GW first passed in mid LAD and another BMW GW passed in Diagonal. First POBA done to proximal 1 with Emerge 2.50x15mm at 12 atm. Pre-dilatation done in mid LAD from distal to proximal at 8:12, 12 atm. Xience Prime 0x33mm stent was deployed across the lesion and inflated at 12 atm. Post dilatation done with NC Emerge 3.0x12mm at 16 atm. Loading dose of Aggrastat given.

RESULT

Final PCI to LAD Done

RECOMMENDATION:

Maintenance dose of Aggrastat
 Oral Antiplatelets
 Aspirin after 24 hours

Dr IMRAN KHAN, Assistant prof
 FICS/FCPS(CARDIOLOGY)

Abbot Vascular
 XIENCE PRIME LL
 3.5 mm x 33 mm
 LOT: 1114341 (B)
 REF: 10-1710-33

EMERGE
 3.0x12mm
 LOT: 100170101C
 REF: 200121

Cordis REF 678-482-00 - 07 XB 3 - 0187LD
 LOT: 0000044



Boston Scientific
 Emerge
 2.50mm x 15mm
 Lot: 08114725800076
 REF: 101180-11C
 LOT: 201121

EMERGE
 3.0x12mm
 Lot: 100170101C
 REF: 101180-11C
 LOT: 201121

Boston Scientific
 Emerge
 2.50mm x 15mm
 Lot: 08114725800076
 REF: 101180-11C
 LOT: 201121

Electronically verified by, no signature(s) required.

Imran Khan
Hayat Muhammad

Patient Name: MUHAMMAD SAAD
 Age: 45 Years
 Sex: Male
 Indications: CHD - ACUTE STEMI

Visit Date: 22-SEP-22
 Referred by: IPD
 Report Date: 22-SEP-22
 Weight (Kg):
 Medical History:
 Medications:

PROCEDURE

Target Lesion: proximal LAD

Approach: PPA

Procedure:
 7B 3 used to engaged LCA, BMW.GW first passed in mid LAD and another BMW.GW passed in Diagonal. First POBA done to Diagonal 1 with Emerge 2.50x15mm at 12 atm. Pre-dilatation done in mid LAD from distal to proximal at 8-12 atm. Xience Prime 3.0x13mm stent was deployed across the lesion and inflated at 12 atm. Post dilatation done with NC Emerge 3.0x12mm at 16 atm. Loading dose of Aggrastat given.

RESULT

Optimal PCI to LAD Done

RECOMMENDATION:

Maintenance dose of Aggrastat
 Dual Antiplatelets
 Re-starts after 24 hours

DR IMRAN KHAN; Assistant prof
 MBBS,FCPS(CARDIOLOGY)

Abbott Vascular
 XIENCE PRIME LL
 3.5 mm x 33 mm
 REF 1011710-33

Boston Scientific
 NC Emerge
 3.0 x 12 mm
 REF 679-052-00

Cordis
 REF 679-052-00 AP X03 01010
 Lot: 16020044



Boston Scientific
 NC Emerge
 3.0 x 12 mm
 REF 679-052-00

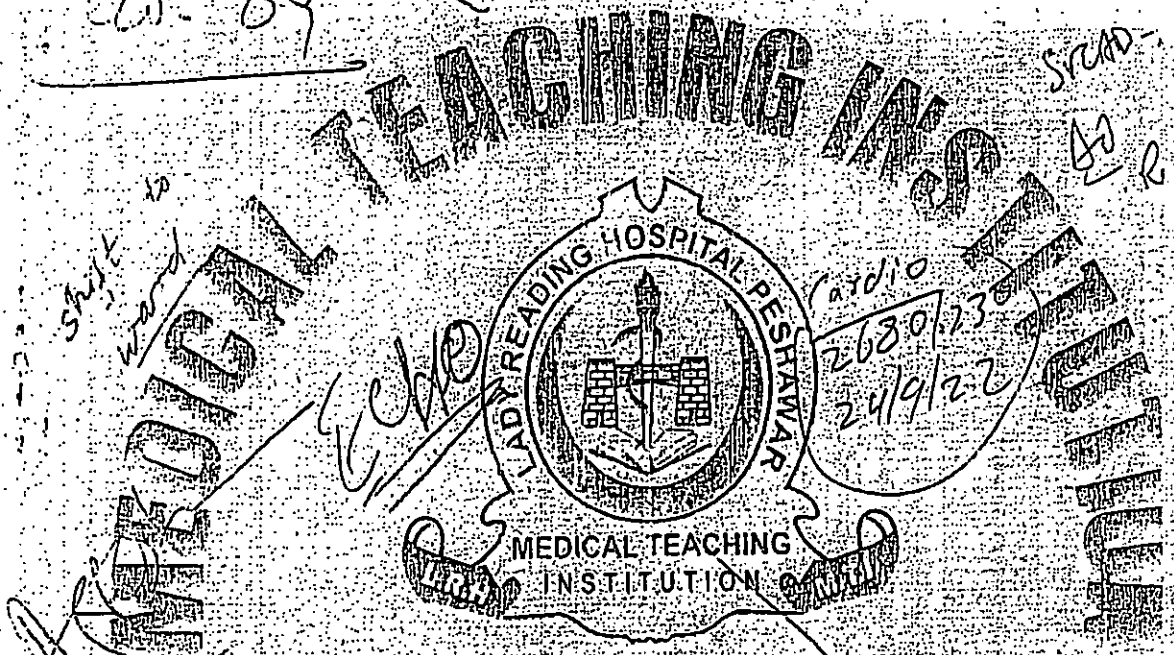
Abbott Vascular
 BILAUER AMPLAZON
 0.017 150 cm
 REF 1001700-0C

Boston Scientific
 Emerge
 2.50mm x 15mm
 REF 679-052-00

Electronically verified by, no signature(s) required.

Attest
 High
 Nayyar

20-09



LADY READING HOSPITAL
PESHAWAR, PAK

Ph: 0092-91-9211430-39

Website: www.lrh.edu.pk

E-mail: info@lrh.edu.pk

Patient Name: Maryam Muhammad

Father's Name: Ghous Muhammad Contact: _____

Age/D.O.B: 17 Gender: M

Allergies: _____ Blood Group: _____

CNIC No.

CONFIDENTIAL

[Signature]
Associate High Court
Peshawar

20

(16)

Patient Name: _____ Date of Birth: _____ Sex: _____ Referring Doctor: _____ Referral: _____ Procedure: ANGIOGRAPHY	Admit Date: 22-SEP-22 Referred by: IPO Report Date: 22-SEP-22 Weight (Kg): _____ Medical History: _____ Medications: _____
---	---

PROCEDURE
 Access Ext. AWTM
 Right Radial Artery entered with seldinger technique. 6F sheath put in JL3.5 6F diagnostic catheter used for LCA. Coronary Angiography done in PA Cranial, 90 LAO 30 LAO Caudal and PA Caudal views. JR4 6F diagnostic catheter used for RCA and views taken in LAO 30, RAO 30. LV gram not done. Pressure homeostasis achieved.
 LMS
 Spinal fluid Normal

Minimal diffuse disease 95% involving origin of Diagonal 1

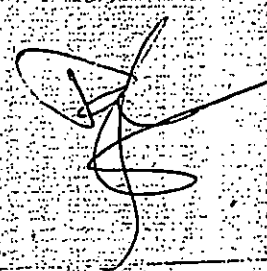
CIRC
 Dominant: Normal

RCA
 Small size vessels. Non-dominant. Normal

RESULT
 SVCAD

RECOMMENDATION:
 PCI LAD

DR IMRAN KHAN, Assistant prof
 CARDIOPSYCHIATROLOGY



Electronically verified by, no signature(s) required.

Attended
 High
 Nawaz

Patient Identification

21

ORDERS

MIT TO SERVICE OF:	Nurse's Initials
MITTING DIAGNOSIS: <i>Acute Anemia - P.P.C.H. LAD 20</i>	
CONDITION: <input checked="" type="checkbox"/> Stable <input type="checkbox"/> Serious <input type="checkbox"/> Critical	
PHYSICAL SIGNS:	
LABORATORY INVESTIGATIONS:	
DATE AND TIME: <i>At The Time of admission</i>	
<i>Tad Hemoglobin 15g 18/10/53</i>	
<i>Tad Hematocrit 45% 18/10/53</i>	
<i>Tad Reticulocyte 2% 18/10/53</i>	
<i>Tad Ferritin 200 ug 18/10/53</i>	
<i>by Agglutination test at 16:00 hrs for 18/10/53</i>	
<i>Tad Ferritin 200 ug 18/10/53</i>	

Doctor Name _____
 Signature _____



Handwritten signature

Patient Identification

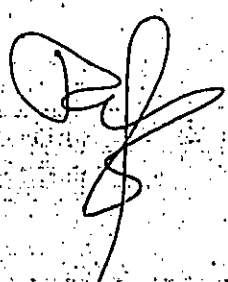
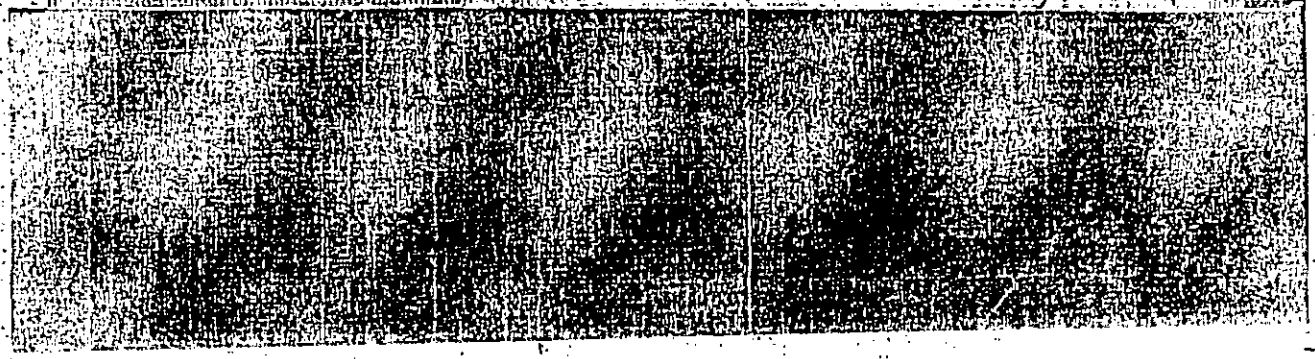
21

ORDERS

	Nurse's Initials
ADMIT TO SERVICE OF:	
ADMITTING DIAGNOSIS: <i>Act Anemi - p.p.c. to L.A.C. 20</i>	
CONDITION: <input type="checkbox"/> Stable <input type="checkbox"/> Serious <input type="checkbox"/> Critical	
PHYSICAL SIGNS:	
LABORATORY INVESTIGATIONS:	
DIET: <i>At The Time of admission</i>	
<i>Tab. Curamin 15mg 1x/d</i>	
<i>Tab. Pheniramine 7.5mg 1x/d</i>	
<i>Tab. Curamin 2.5mg 1x/d</i>	
<i>Tab. Penicillin 200mg 2x/d</i>	
<i>by Agent in 200mg 1x/d at 1400 hrs for 18 hrs</i>	
<i>Tab. Penicillin 200mg 2x/d</i>	

Doctor Name: _____

Signature: _____

Att. used

Patient's Identification

Harper [unclear]
 27759549

ADMINISTRATION RECORD

Name	Initial	Nurse's Signature	Initial
		<i>[Signature]</i>	

Name Medication or Frequency Route	Prescribed Hour(s) Administration	Date/Month		Time		Time		Time		Time	
		Time	Initial	Time	Initial	Time	Initial	Time	Initial	Time	Initial
<i>Tab. Coprin 150mg</i> <i>30-7-12</i>	<i>150mg</i>	<i>30-7-12</i>	<i>[Initial]</i>	<i>30-7-12</i>	<i>[Initial]</i>	<i>10:00 AM</i>					
<i>Tab. Parva 75mg</i> <i>0-4-12</i>	<i>75mg</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>10:00 AM</i>					
<i>Tab. Lorazepam 1mg</i> <i>0-4-12</i>	<i>1mg</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>10:00 AM</i>					
<i>Tab. Levamisole 150mg</i> <i>0-4-12</i>	<i>150mg</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>10:00 AM</i>					
<i>Tab. Parva 75mg</i> <i>0-4-12</i>	<i>75mg</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>0-4-12</i>	<i>[Initial]</i>	<i>10:00 AM</i>					

[Signature]

ft + list of
[Signature]

LADY READING HOSPITAL

MEDICAL TEACHING INSTITUTION

PESHAWAR, KHYBER PAKHTUNKHWA

PK0227599963

22 SEP 22 13:09:47

23
DEPT. MANAGEMENT OFFICER
EMERGENCY DEPARTMENT
LADY READING HOSPITAL
PESHAWAR

PK0206922759999

Name: Hayat Muhammad

Age: 60 Year

District

Full Name: SHAL MUHAMMAD

56000

Emergency Department: EMERGENCY

Counter: EMERGENCY Serial No. _____

Complaints:

chest pain
since
normal

DM (+) / HTN (+)

Reg. Naloxon 1/2 cc + Ciprofloxacin
+ IV Stat

Findings:

BP - 161/89
pulse - 86
CtO2 97

AWML

Dr. Imran

Dr. Hassa

1-20

Investigations:

- BCL's
- Cardiac profile
- Lipid profile
- Urinal profile
- Urine RFT
- Troponin I

Diagnoses:

- IHD
- Urinary

Amir ul
CC Undercar
Dr. Imran

Next Visit:

Consultant Name:

Signature

Attended
50

24

(20)

Lady Durrani Hospital, A-11 Faisalawa
 Road, Faisalawa, Islamabad, Phone: 373-2111
 Email: ladydurranihospital@gmail.com
DISCHARGE SUMMARY

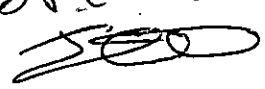
Patient No: 2022010010000
 Patient Name: Mr. Imran Khan
 Age: 45
 Sex: Male

Admission No: 2022010010000
 Admission Date: 27-SEP-2022
 Admission Time: 11:30 AM
 Discharge Date: 28-SEP-2022
 Discharge Status: Improved
 Primary Consultant: DR IMRAN KHAN
 Admitting Consultant: DR IMRAN KHAN

List any chronic medical conditions that the patient may have, such as diabetes mellitus, hypertension, etc.

Procedures Performed:

Prof

Attested:


(101) (102) (25)

NO.	NAME	POST	GRADE	DATE	REMARKS
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Attest
~~Signature~~
Peshawar

(26)

23/9/22

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50/100 mm
PAPER: 50/100 mm

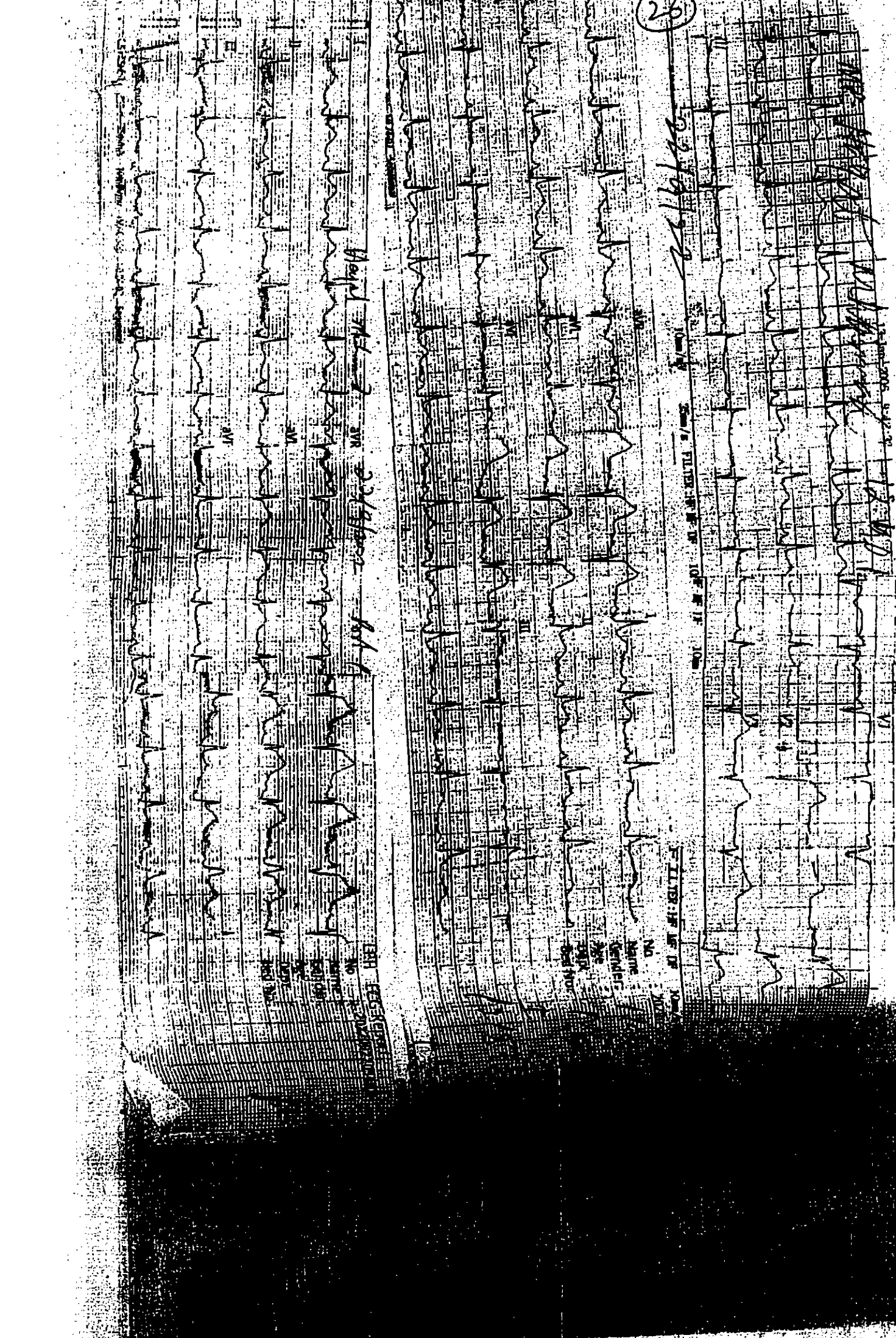
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PAPER: 50/100 mm

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50/100 mm
PAPER: 50/100 mm

No. _____
Name _____
Gender _____
Age _____
Sex _____
and HD _____

ECG RECORDING
No. _____
Name _____
Gender _____
Age _____
Sex _____
and HD _____

Blond M 35
23/9/22
100/100



Attended
to

BEFORE THE COURT HONOURABLE PESHAWAR HIGH COURT, PESHAWAR



Writ Petition No _____/2023

Hayat Muhammad S/O Shal Muhammad R/O Bashir Abad Tehsil and District Peshawar..... (Petitioner)

V.E.R.S.U.S

1. Government of Khyber Pakhtunkhwa through Chief Secretary
2. Secretary Transport and Mass Transit, Khyber Pakhtunkhwa, Peshawar..... (Respondents)

Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973

PRAYER:-

On acceptance of this Petition, an appropriate writ may

Handwritten signature and stamp at the bottom of the page.

- 3) That in the year 2021, the Petitioner sustained stroke/ brain hembridge, due to which he got paralysed.
- 4) That the Petitioner got severally sick in the year 2002 and after consultation with doctors, it come to the surface that the Petitioner was suffering with sever cardiac disease and in the month of September, 2022, the Petitioner had to face heart attack/cardiac arrest, due to which he become completely unfit to continue his services.
- 5) That due to his worse health condition, the Petitioner applied for his pre-mature retirement on medical grounds and in the light of the said application, the Petitioner was referred to the Standing Medical Board.
- 6) That the Standing Medical Board declared the Petitioner unfit for further service, and the opinion of the medical board alongwith application of the Petitioner were forwarded to the Respondent No 1.
- 7) That the Respondent No 1, instead of accepting the application of the Petitioner for the grant or pre-mature retirement on medical ground, ordered the retirement of the Petitioner on the expiry of his age of superannuation.
- 8) That feeling aggrieved from the order of Respondent No 1, the Petitioner having no alternative remedy available to him, prefers the instant Writ Petition on the basis of the following ground inter-alia:-

ATTESTED

Attested
Scale
Peshawar

GROUNDS:

- A) That the action of the Respondent No.1 is illegal, unlawful, without any legal authority and ineffective against the precious right of the Petitioner.
- B) That as per rules, the Respondent No.1 was not supposed to have ignored the opinion of the Standing Medical Board and by doing so, he has violated the rules.
- C) That all those employees, who are declared unfit by the Standing Medical Board are held entitled for pre-mature retirement on medical ground. But in the case in hand, the Petitioner has been treated with the discrimination.
- D) That mere the ground that the age of expiry of superannuation of the Petitioner was close, is not enough of deprive of the Petitioner from his legal rights at pre-mature retirement.
- E) That as per law, it is the fundamental right of every citizen to be treated in accordance with law, but the Petitioner has not been treated in accordance with law, rather his legal right is being denied to him without any reason.
- F) That any other grounds will be raised at the time of arguments with the permission of this Honourable Court.

PRAYER:-

It is, therefore, respectfully prayed that on acceptance of this Constitutional Petition, an appropriate writ may very kindly be issued, whereby order dated 27-06-2023 may very graciously be adjudicated some null and void and the

ATTESTED


[Signature]
Advocate High Court
Peshawar

Respondents may kindly be directed to retire the Petitioner premature in the light of opinion of the Standing Medical Board.

Any other relief, which this Honourable Court deems just and appropriate in the circumstances of the case, not specifically asked for, may also be granted in favour of Petitioner against the Respondent No 1.

INTERIM RELIEF:-

By way of interim relief, the impugned ex-parte decree vide order 27-06-2023 may please be suspended till the final disposal of the instant writ petition.

Through: 
 (JAWAD KHAN)
 Advocate
 High Court, Peshawar

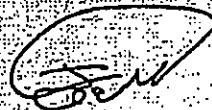
Dated: -13-07-2023

CERTIFICATE:-

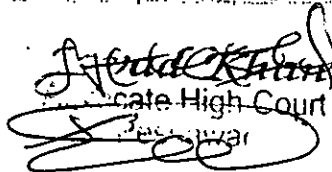
No Writ Petition has earlier been filed on the subject between the parties is pending before this Honourable Court

LAW BOOKS:-

1. Constitution of Islamic Republic of Pakistan, 1973
2. Case law according to need.


 Advocate

~~ATTESTED~~
~~EXAMINER~~
 Peshawar High Court


 Advocate High Court
 Peshawar

BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR

Hayat Muhammad

V E R S U S

Government of KP and another

AFFIDAVIT

I, Hayat Muhammad S/O Shal Muhammad R/O Bashir Abad Tehsil and District Peshawar, do hereby solemnly affirm and declare on oath that all the contents of accompanied Writ Petition are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.

DEPONENT Hayat Muhammad
GNIC # 1730-1572461-3
Cell # 0301-8861469

Identified by:-

Jawad Khan
(JAWAD KHAN)

Advocate
High Court, Peshawar

43224
Certified that the above sworn affidavit on solemn affirmation of 13 day of July 23 Hayat Muhammad s/o Shal Muhammad Peshawar who was identified by Jawad Khan who is an Advocate of this Court.
J. Khan
13/7/2023

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Under Article 8, 7 of

Hayat Muhammad
Peshawar

PESHAWAR HIGH COURT, PESHAWAR
ORDER SHEET



Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
1	2
24.10.2023	<p>W.P No.3148-P/2023 With IR.</p> <p>Present: Mr. Jawad Khan, Advocate, for the petitioner.</p> <p>Barrister Muhammad Shah, AAG, for the official respondents.</p> <p>*****</p> <p>IJAZ ANWAR, J. At the very outset of hearing, learned counsel, representing the petitioner, after giving second thought, stated that he wants to withdraw the instant petition, with permission to submit departmental representation and thereafter to approach the learned Khyber Pakhtunkhwa Service Tribunal for the redressal of their grievance.</p> <p>2. In the light of the above, the instant petition is dismissed as withdrawn; however, petitioner is at liberty to avail appropriate remedy by approaching the proper forum.</p> <p>Announced Dt:24.10.2023.</p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p>

15598

Date of Presentation of Application: 26-10-2023

No of Pages: 6

Copying fee: 24-60

Total: 26-10-2023

Date of Preparation of Copy: 26-10-2023


Date of Delivery of Copy: 26-10-2023

Amount Paid: 26-10-2023

(Amir Shazad) * (DB) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice Shakeel Ahmad

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Under Article 3, 7 of

To,

 20/11/2023
The Chief Secretary
Khyber Pakhtunkhwa,
Peshawar

Subject: - DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 27-06-2023, WHEREBY THE APPELLANT RETIRE ON PRE-MATURE MEDICAL GROUND IN THE LIGHT OF OPINION OF THE STANDING MEDICAL BOARD

PRAYERS: - ON ACCEPTANCE OF THIS DEPARTMENTAL APPEAL, THE IMPUGNED ORDER DATED 27-06-2023 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE RETIRED ON MEDICAL GROUNDS

Dear Sir,

- 1) That the Appellant was appointed in the Transport Department on 08-05-1984.
- 2) That since his appointment, the Appellant has rendered his services, whole heartedly and spiritedly to the best of his abilities.
- 3) That in the year 2021, the Appellant sustained stroke/ brain hembridge, due to which he got paralysed.
- 4) That the Appellant got severally sick in the year 2002 and after consultation with doctors, it come to the surface that the Appellant was suffering with sever cardiac disease and in the month of September, 2022, the Appellant had to face heart attack/cardiac arrest, due to which he become completely unfit to continue his services.
- 5) That due to his worse health condition, the Appellant applied for his pre-mature retirement on medical grounds and in the light of the said application, the Appellant was referred to the Standing Medical Board.

O/K

- 6) That the Standing Medical Board declared the Appellant unfit for further service and the opinion of the medical board alongwith application of the Appellant was forwarded to the Chief Secretary.
- 7) That instead of accepting the application for my retirement on medical grounds vide order dated 27-06-2023, order of retirement of the Appellant on superannuation was passed.
- 8) That it is evident from the record that the Appellant was seriously sick and was entitled to the pre-mature retirement on medical grounds instead of retirement on superannuation.

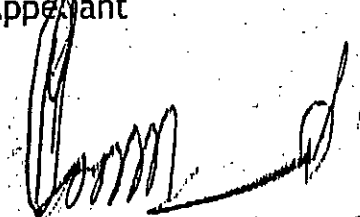
PRAYER:-

It is, therefore, most humbly submitted that on acceptance of this Appeal, the impugned order dated 27-06-2023

may kindly be set aside and the Appellant may kindly be retired

on medical grounds.

Appellant


 (HAYAT MUHAMMAD)
 S/O Shal Muhammad
 cR/O Bashir Abad

20/11/2023

(6a)

PAKISTAN

Name: **Hayat Muhammad**

Gender: **Male**

17/01/1976

09-11-2016

Signature

Registrar General of Pakistan

Handwritten signature in Urdu script

Handwritten signature in Urdu script



۲۰۲۶ء منجانب محمد صاحب
محمد صاحب کے نام و دستخط

موضوع
مقدمہ
دعوی
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہ دہی وکل کاروائی متعلقہ

آن مقام کے لئے جو اہل کاروائی اور بیرونی متعلقہ
محمد صاحب کے نام و دستخط

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے کے تقرر ثالث فیصلہ پر حلف دیے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور دعویٰ چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
رہاں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیرونی یا ڈگری یکطرفہ یا اپیل کی برادگی
اور منسوخی نیز دائر کرنے اپیل مگرانی و نظر ثانی و بیرونی کرنے کا محتاج ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ اپنے ہمارے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیار حاصل ہوں گے
اور اس کا ساختہ برواختہ منظور ہوں ہوگا دوران مقدمہ میں جو خرچہ ہر جہت اتوائے مقدمہ ہوں گے
سب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا بند ہوں گے۔
کہ بیرونی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ مندر ہے۔

۱۳۷۱۔ ۱۱۔ ۲۰
۵۷۶۸۵۵۲

۲۰۲۶ء

المترجم

العبد و اہ العبد

مقام
کے لئے منظور ہے۔

محمد صاحب کے نام و دستخط