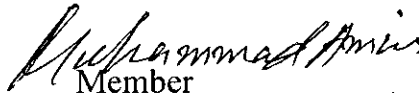
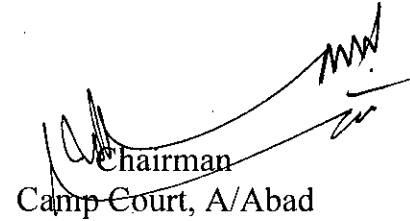


49/2016

19.10.2017 Appellant alongwith counsel and Mr. Muhammad Bilal, Deputy District Attorney alongwith Dr. M. Rahim, Dr. Irshad Ahmad, Amjad Ali, Assistant and Yar Gul, Senior Clerk for the respondents present. Arguments heard and record perused.

This appeal is also accepted as per our detailed judgment of today in connected service appeal No. 48/2016, entitled Tanzeel Ur Rahman Vs. Government of Khyber Pakhtunkhwa, through Secretary, Health Department and 3 others", Parties are left to bear their own costs. File be consigned to the record room.

  
Member

  
Chairman  
Camp Court, A/Abad

ANNOUNCED  
19.10.2017

15.03.2017

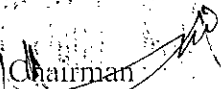
Counsel for the appellant, M/Adil A.G for respondents present. Abdur Rahim, Nursing Officer, Amjad Ali, Asstt. Dr. Muhammad Daud, M.S DHO Hospital, Batagram and Dr. Ashfaq Fazal, SMO alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Due to non-availability of D.B arguments could not be heard. To come up for final hearing before the D.B on 19.07.2017 at camp court, Abbottabad.

  
Chairman  
Camp Court, A/Abad

19.07.2017


Clerk of counsel for the appellant and Mr. Muhammad Bilal, DDA for the respondents present. Due to general strike of the Bar, counsel for the appellant is not in attendance. Adjourned. To come up for final hearing on 19.09.2017 before the D.B.

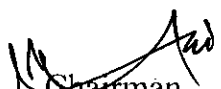
  
Member

  
Chairman  
Camp court, A/Abad

19.09.2017

Appellant in person, Mr. Muhammad Bilal, Deputy District Attorney alongwith Dr. Ashfaque Ahmad, Dr. Muhammad Irshad, Amjad Ali, Assistant and Yar Gul, Assistant for the respondents present. Counsel for the appellant has gone to perform Hajj. Seeks adjournment. Adjourned. To come up for arguments on 18.10.2017 before D.B at camp court, Abbottabad.

  
Member

  
Chairman  
Camp court, A/Abad.

02.06.2016

Counsel for the appellant present. Requested for requisition of file. File requisitioned for to-day.

Counsel for the appellant submitted an application for restraining the respondents from appointment against the post previously occupied by the appellant. Notice of application shall be issued to the respondents for the date fixed i.e. 20.07.2016 before S.B at camp court, Abbottabad. Any appointment against the subject post shall be subject to final decision of this Tribunal.

  
Chairman

20.07.2016


Clerk of counsel for the appellant and Mr. Amjad Ali, Assistant alongwith Mr. Muhammad Siddique. Sr.GP for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 19.10.2016 at came court, Abbottabad. The restraint order shall continue.

  
Chairman

19.10.2017

Counsel for the appellant and Mr. Muhammad Siddique, Sr.GP alongwith Amjad Ali, Assistant Shah Rahman, Asstt. Feroz Khan, Senior and Mst. Sobia Bibi, LHV for the respondents present. Rejoinder submitted. Learned counsel for the appellant requested for adjournment. To come up for final hearing on 15.3.2017 at camp court, Abbottabad.

  
Member

  
Chairman  
Camp Court, A/Abad

20.1.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as Technician but removed from service vide impugned order dated 11.9.2015 on the allegations of irregular appointment where-against he preferred departmental appeal on 9.10.2015 which was not responded and hence the instant service appeal on 12.01.2016.

That the appointment of the appellant was made after fulfilling the prescribed codal formalities and as such the impugned order is a nullity.


Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 21.4.2016 before S.B at Camp Court A/Abad. Notice of stay application be also issued for the date fixed.

Appellant Deposited  
Security & Process Fee

  
Chairman  
Camp Court A/Abad

21.04.2016

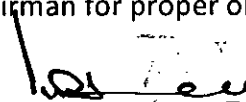

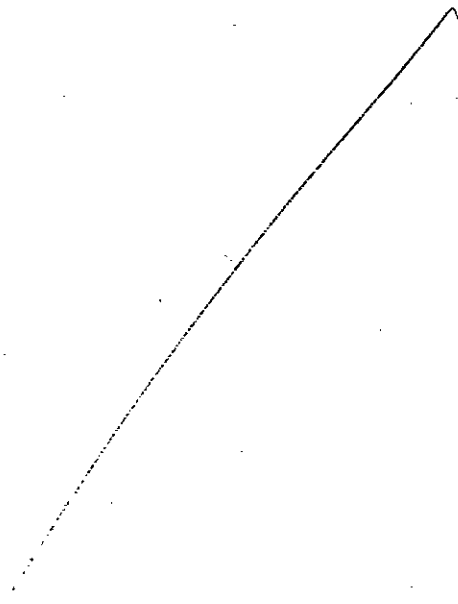
Appellant in person, M/S Muhammad Arshad, SO and Shah Rahman, Asstt. alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Requested for adjournment. To come up for written reply/comments on 20.7.2016 before S.B. at Camp court, Abbottabad.

  
Chairman  
Camp court, A/Abad

Form- A  
FORM OF ORDER SHEET

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

Case No. 49/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	12.01.2016	<p style="text-align: center;">The appeal of Mr. Rashid Khan presented today by Mr. Khan Afzal Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2		<p style="text-align: center;">This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>20-1-16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

*Appeal no 49/2016*

1. Rashid Khan Son of Ghulam Akbar, Ex-

JCT.....Appellant

VERSUS

(5) Government of KPK, & Others

.....Respondents

INDEX

S.no	Description of the Documents	Annexure	Page #
1	Appeal along with verification		1 to 6
2	Correct address of the parties		7
3	Suspension Application		8, 9
4	Copy of advertisement	A	10
5	Copy of Advertisement letter	B	11, 12
6	Copy of Charge Report	C	13, 14
7	Copy of the Order 128-33 dated 23-01-2015	D	15 to 17
8	Copy of order 179-85 dated 29-01-2015	E	18
9	Copy of order 1039-40 dated 17-03-2015	F	19
10	Copy of order 1081-82 dated 19-03-2015	G	20
11	Copy of Attendance Register	H	21 to 33
12	Copy of Removal Order	I	34
13	Copy of Departmental Appeal & Receipt	J	35, 36
14	Original Receipt	K	37
15	Copy of the Direction	L	38 to 52
16	Copy of letter respondent no 4	L1	53
17	Copy of Peshawar High Court judgment	L2	54 to 62
18	Copy of Showcase Notice	M	63
19	Copy of the letter dated 31-07-2015	M1	64
20	Application of appellant	N	65
21	Copy of Certificates	O	66 to 82
22	Wakalat Nama		83

*Rashid Khan*

Rashid Khan  
.....Appellant

THROUGH

*[Signature]*  
KHAN AFZAL  
ASC (MANSEHRA)

*0300-5617163*

①

BEFORE KPK SERVICE TRIBUNAL PEHSWAR

Appeal no. 49/2016

1) Rashid Khan Son of Ghulam Akbar, Ex-JCT (Surgical)

District Head-Quater Hospital Battagram

.....Appellant

VERSUS

A.W.F. Province  
Service Tribunal  
Diary No. 36  
Date 12-01-2016

(1) Government of KPK, through Secretary Health, KPK

Peshawar.

(2) Director General Health KPK Peshawar

(3) Medical Superintendent, District Headquarter Hospital,

Battagram.

(4) District Health-Officer Battagram

.....Respondents

APPEAL AGAINST THE ORDER NO 2996-99/00

DATED 11-09-2015 PASSED BY RESPONDENT NO 03

MEDICAL SUPERINTENDENT DISTRICT

HEADQUATER HOSPITAL BATTAGRAM VIDE

WHICH APPELLANT WAS REMOVED FROM THE

SERVICE

Applied to-day  
12/1/16

PRAYER:

- a) On acceptance of the appeal, the order no 2996-99/00 dated 11-09-2015 issued by the respondent no 3 may kindly be set aside and the appellant may be reinstated on service with all back benefits.

2

- b) Respondents may be directed to release the salaries of the appellant respect for the periods from 1<sup>st</sup> January 2015 to 11-09-2015.

**Respectfully Shewed!**

- 1) That the EDO Health advertised the post of JCT (Surgical) through daily Mashriq on 05-11-2011. Photocopy of Advertisement Annexure as Annex "A".
- 2) That departmental selection committee was constituted by the department for the appointment against the said advertised post.
- 3) That petitioner along with so many other people applied for the said posts.
- 4) That district selection committee short listed the candidates & later on short listed candidates called for interview including appellant.
- 5) That at the time of interview selection committee also checked / verified the required document of the Appellant.
- 6) Appellant qualified the interview and got 53 Marks in interview and stand second as per merit list.
- 7) That the appellant along with other two person was appointed on 28-05-2012 on the recommendation of DSC & after completing all legal & codel formality and appellant resumed the charge in the said hospital on the basis of said appointment order. (Copy of the Appointment letter & Charge Report annex as a annexure "B & C").



- 8) That during the service the salaries of appellant were stopped by the District Health Officer Battagram / respondent No 4 vide office order no 128-33 dated 23-01-2015 at Sr. No 18. (Copy of the Said Order is Annexed as a Annexure "D").
- 9) That the said order was withdrawn by the respondent no 4 vide office order no 179-85 dated 29-01-2015. (Copy of the Said Order is Annexed as a Annexure "E").
- 10) That again vide order no 1039-40 dated 17-03-2015 at serial no 5 respondent no 4 requested the respondent no 3 to avoid appellant from duty and attendance till further order, but on 19-03-2015 vide order no 1081-82 appellant was allowed to continue the service. (Copy of the Said letter are Annexed as a Annexure "F" & "G").
- 11) That the appellant was served the department till 11-09-2015 i.e termination but inspite of the order 29-01-2015 saleries of the appellant was not released for the period 01-01-2015 to 11-09-2015 (Copy of attendance register are annexed as annexture "H")
- 12) That the appellant was removed from the service on 11-09-2015 by the respondent no 03. (Copy of the removal Order is Annexed as a Annexure "I").
- 13) That against the impugned removal order dated 11-09-2015 , appellant Submitted departmental appeal on 09-10-2015 to respondent no.2 , but till today said respondent

did not reply the appeal of appellant. Hence this appeal on the following among the other grounds.(Copy of Department Appeal & Receipt here by annexed as annexure J & K).

**GROUND**

i. That the impugned order is wrong, illegal and against the service laws and rule, hence not maintainable.

ii. That no sufficient reason is given in the removal order by the respondent no 3.

iii. That appellant was correctly appointed by the Executive District Health Officer on the recommendation of District Selection committee & completing the legal & Coddle formalities.

iv. During service the appellant certificate / documents were verified by the respondent from the relevant board and institution and which were found correct.

v. That the so called ex party inquiry report is wrong, illegal, without jurisdiction and against the services law and rules,

“due to this reason respondent no 4 who is (appointing authority) forwarded letter on 17-06-2015 to respondent no 2 in which he stated that observation of inquiry committee are not valid” Chief Minister directed to Respondent No 1 not to take any action against the appellant vide letter dated 08-12-2014. (Photocopy are here by annexed “L & L1”)

vi. That salary of appellant was stopped by the respondent From 1<sup>st</sup> January 2015 to 11-09-2015 in spite of the order dated 29-01-2015.

vii. That the medical faculty Peshawar issue registration certificate to appellant on which was verified by the DHO Battagram through proper channel and the said certificate found correct. Impugned Order of the respondent is against the spirit of the verdict of the honourable Peshawar high court passed in COC No 181/2010 in WP No 2377/2010. (Copy of Annex as annexure L2)

viii. That no summary of allegation nor inquiry law given to appellant, no opportunity of cross was given to appellant.

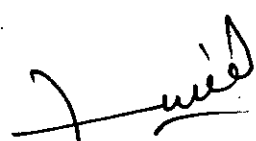
ix. That disputed order of the respondent No 3 is also against the spirit of his own recommendation on letter dated 31-07-2015 vide which departmental appeal of the appellant against the showcase notice dated 23-07-2015 was forwarded by respondent no 3 to respondent no 2 photocopy of the showcase notice letter dated 31-07-2015 alongwith departmental application/appeal of the appellant which is here by annexed as annexure "M M1 & N")

x. That the appellant have required qualification hence the impugned order is liable to be set a side. (relevant certificates are here by annexure "O").

xi. That no showcase notice issue & served as per law. Inspite of appellant request, appellant was not personally heard before removal order .

**PRAYER:**

- a) On acceptance of the appeal, the order no 2996-99/00 dated 11-09-2015 issued by the respondent no 3 may kindly be set aside and the appellant may be reinstated on service with all back benefits.
- b) Respondents may be directed to release the saleries of the appellant respect for the periods from 1<sup>st</sup> January 2015 to 11-09-2015.

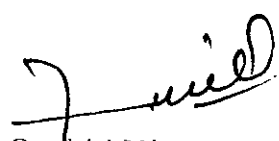
  
 Rashid Khan  
 .....Appellant

THROUGH  
  
 KHAN AFZAL  
 ASC (MANSEHRA)

**VERIFICATION:**

I , Rashid Khan S/O Ghulam Akbar, Ex-JCT (Surgical) District Head Quater Hospital Battagram , hereby certify that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

Dated:

  
 Rashid Khan  
 .....Appellant

7

**BEFORE KPK SERVICE TRIBUNAL PESHAWAR**

1. Rashid Khan.....Appellant

**VERSUS**

2. Government of KPK & Others

.....Respondents

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

**Respectfully Sheweth!**

Correct Addresses of the parties are as under:-

**APPELANT**

1. Rashid Khan Son of Ghulam Akbar, Ex-JCT  
(Surgical) District Head Quater Hospital Battagram

.....Appellant

**RESPONDENTS:-**

1. Government of KPK; through Secretary Health, KPK Peshawar.
2. Director General Health KPK Peshawar
3. Medical Superintendent, District Headquarter Hospital, Battagram.
4. District Health Officer Battagram

  
Rashid Khan

.....Appellant

~~THROUGH~~  
~~KHAN AFZAL~~  
ASC (MANSEHRA)

0300-5617163

8

BEFORE KPK SERVICE TRIBUNAL PEHSWAR

1. Rashid Khan .....Appellant

VERSUS

2. Government of KPK, & Others

.....Respondents

**Respectfully Sheweth!**

Application for suspension of disputed removal order dated 11-09-2015 as under

- 1) That above title service appeal is filed today in this honourable tribunal.
- 2) That appellant have good case and INSHALLAH hope for success in appeal.
- 3) That balance of convenience is in favour of appellant.
- 4) That in a case of non suspension of disputed order appellant would suffered irreparable loss.

It is requested that impunged order dated 11-09-2015 may kindly be suspended till the decision of above title appeal.

  
Rashid Khan

.....Appellant

THROUGH

  
KHAN AFZAL  
ASC (MANSEHRA)

9

AFFIDAVIT:

I , Rashid Khan S/O Ghulam Akbar, Ex-JCT (surgical) District Head Quater Hospital Battagram , hereby certify on oath that the contents of application are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

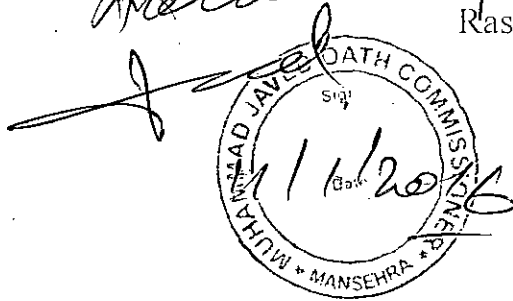
Dated:

*[Signature]*

*[Signature]*

Rashid Khan

.....Appellant



10

# درخواستیں

Annex  
A

ذیل درجہ کی آگے دی گئی جگہوں میں ایسے ایسے عہدہ داروں کی درخواستیں قبول ہیں جن کی عمر 17 نومبر 2011ء تک 60 سال سے زیادہ نہ ہوگی۔

رد نمبر	عہدہ نام	بھرتی کی سطح	جنس	تعداد
1	Jr. Clinical Technician (Dentistry)	BPS-09	مرد	18
2	Jr. Clinical Technician (Surgery)	BPS-09	مرد	18
3	Jr. Clinical Technician (Ophthalmology)	BPS-09	مرد	18
4	Jr. Clinical Technician (Anesthesia)	BPS-09	مرد	18
5	Jr. Clinical Technician (Cardiology)	BPS-09	مرد	18
6	Jr. Clinical Technician (Radiology)	BPS-09	مرد	18
7	Jr. Clinical Technician (Sterilization)	BPS-09	مرد	18
8	Jr. Clinical Technician (Physiotherapy)	BPS-09	مرد	18
9	Female Jr. Clinical Tech (Dental)	BPS-09	عورت	18
10	Female Jr. Clinical Tech (Pharmacy)	BPS-09	عورت	18
11	Female Jr. Clinical Tech (Pathology)	BPS-09	عورت	18
12	Female Jr. Clinical Tech (Anesthesia)	BPS-09	عورت	18
13	Female Jr. Clinical Tech (Cardiology)	BPS-09	عورت	18
14	Female Jr. Clinical Tech (Surgical)	BPS-09	عورت	18
15	Electrician	BPS-06	مرد	18
16	Storekeeper	BPS-06	مرد	18
17	Junior Clerk	BPS-07	مرد	18
18	Plumber	BPS-05	مرد	18

درخواستیں قبول  
2011ء

شرائط و شرائط: 1۔ کوئی درخواست منظور ہونے کے بعد وصول کی جائے گی۔ 2۔ ہر کوئی ملازمین اپنے گھر کے قریب سے درخواستیں ارسال کر سکتے ہیں۔ 3۔ درخواست دہندہ کو بوقت انٹرویو اپنے اصل اسناد پیش کرنے ہوتے۔ 4۔ صرف شہریت لہذا اہل ذہن ہونے کی ضرورت ہے۔ 5۔ انٹرویو کیسے کوئی ملازمین اپنے گھر سے آجائے۔ 6۔ ملازمین کو اپنی باقاعدہ درخواستیں پیش کرنا۔ 7۔ درخواستوں کے نمبر داروں کو انٹرویو ہونے کی اطلاع ملے گی۔ 8۔ درخواستیں سادہ اور آسان ہونی چاہیے۔ 9۔ درخواستیں آسانی کے ساتھ اور انٹرویو ہونے کے وقت ہونی چاہیے۔ 10۔ انٹرویو ہونے کے وقت ہونی چاہیے۔





OFFICE OF THE EXECUTIVE DISTRICT  
OFFICER (HEALTH) BATTAGRAM

No. \_\_\_\_\_ /PF Dated: \_\_\_\_\_ /09/2012

To:

Mr. Rashid Khan S/o Ghulam Akbar

R/o Village and P.O Taya Jadeed Tehsil & Battagram.

Subject:

APPOINTMENT ORDER

Memo:

On the recommendation of Departmental Selection Committee (DSB). You are hereby appointed as JCT(Surgery) in BPS-09 (Rs. 6200-380-17600) plus usual allowances as admissible under the rule on regular basis against the vacant post of JCT(Surgery) in BPS-09 (Rs. 6200-380-17600) at District Head Quarter Hospital Battagram with immediate effect:- the following terms and conditions:-

TERMS & CONDITION.

1. Initially you will be on probation for a period of one year extendable for a further period of not exceeding 6 months.
2. Your services can be dispensed with during the probation period if your work and conduct is found unsatisfactory.
3. The appointment will be subject to provide a Medical Fitness Certificate (Health & Age) From Medical Superintendent DHQ Hospital Battagram and verification of character and Antecedents/Educational Qualification etc.
4. No TA/DA will be allowed for joining the duty or obtaining the Medical fitness certificate
5. You will be governed by such rule and orders as may be issued by the Govt: from time to time for the category of Govt: Servant to which they belong.
6. You shall for all intents and purposes be Civil Servants except for the purpose of pension and gratuity. In lieu of the same you will be entitled contributory provident fund as per Govt: rules/instructions.
7. You will submit undertaking on judicial stamp paper stating that the documents submitted with application form are genuine and not fake, moreover they have not been dismissed from service by any Govt: or semi Govt: organization.
8. Where you remains absent without leave for a period of Seven (07) days you shall be deemed to have Violated the relevant rules provisions and shall be terminated from service.

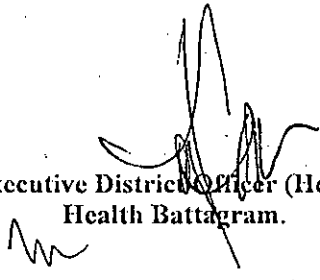
Annex  
B.C.

- 9. If you wish to resign from service, two month advance notice or to deposit two month salary in lieu thereof. However you will continue to serve to the Govt; till the resignation is accepted by the competent authority.
- 10. The appointee shall be responsible for all utility bills and other charges of the residential Accommodation as is applicable to the category of staff.
- 11. The appointees shall subject to all rules of Govt; pertaining to a civil servant in respect to Efficiency and Discipline, conduct, Liability to criminal proceeding etc, and any special rules, Instruction issued by the Health Department specified to employee for breach of discipline or unsatisfactory service, The Health Department shall be competent to terminate the services of culprit without notice or compensation.
- 12. No employee shall indulge in any trades, business or occupation or any activity, which is Prohibited for a regular Govt; servants.
- 13. Spouse policy shall not be applicable to the appointee.
- 14. Your pay will be release after verification of your documents.
- 15. If you accept the offer of appointment on above terms and conditions, you should report to M.S DHQ Hospital Battagram with in 15 days of the issuance of this order.  
The offer will be cancelled, if you fail to report for duty with in the above mentioned period.

Executive District Officer (Health)  
Health Battagram.

No. 1187-91 / PF Dated Battagram the, 28/5 /2012

- 1. Director General Health Services KPK Peshawar for information please.
- 2. District Coordination Officer Battagram for information please.
- 3. ✓ Medical Superintendent DHQ Hospital Battagram
- 4. District Accounts Officer Battagram for information and necessary action
- 5. District Accounts Section office of the undersigned
- 6. Accounts Section office of the undersigned

  
Executive District Officer (Health)  
Health Battagram.

13

Anne  
"A" & "C"

بخدمت جناب میڈیکل سپرنٹنڈنٹ ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بنگرام

موضوع: اراضی رپورٹ از چیمبر کلینیکل ٹیکنیشن (سرجی) پوسٹ ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بنگرام

جناب عالی:-

گزارش بیکہ سائل بحوالہ جناب ایگزیکٹو ڈسٹرکٹ آفیسر صاحب منگہ صحت ضلع بنگرام آرڈر نمبر 1187-91 مورخہ 28.05.2012 تحت کلینیکل ٹیکنیشن (سرجی) پوسٹ پرتھویناتی ہوئی ہے، سائل آج مورخہ 28.05.2012 کو قبل از دوپہر ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بنگرام میں کلینیکل ٹیکنیشن (سرجی) پوسٹ پر اپنا حاضری رپورٹ پیش کرتا ہے۔ جناب سے استدعا ہے بیکہ منظور فرمایا جائے۔ عین نوازش ہوگی۔

العارض

مورخہ 28/05/2012

*(Handwritten signature)*

نام - راشد خان

مہدہ کلینیکل ٹیکنیشن (سرجی)

مقام ڈیوٹی ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بنگرام

Not a Commission  
to authority

*(Handwritten signature)*  
29/5/2012

Attest  
*(Handwritten signature)*

14

MEDICAL CERTIFICATE.

Name of Official... Rashid Khan .....

Caste or race... Swati .....

Father's name... Ghulam Akbar .....

Residence... Village Taryya Jaded Tehsil and  
District Battagram .....

Date of birth... 02-02-1987 .....

Exact height by measurement... 5-8 .....

Personal mark of identification... Nil .....

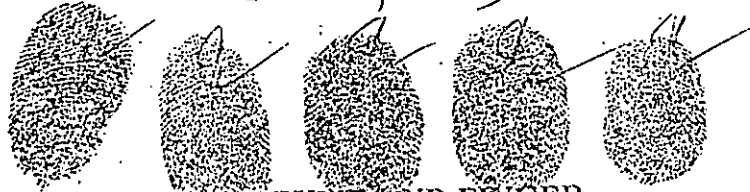
Signature of the Official... Rashid .....

Signature of head of office.....

Seal of Office.....

I do hereby certify that I have examined Rashid Khan ..... a candidate for  
Employment in the Office of the Health Dept. DHQ Hosp. Battagram  
And can not discover that he had any disease communicable or other constitutional affection  
or bodily infirmity except ..... Nil .....

I do not consider this as disqualification for employment in the office of the... above...  
His age according to his own statement... 26 ..... Year and by appearance  
about... 26 (Twenty six) ..... year.



LEFT HAND THUMB AND FINGER IMPRESSIONS.....

Rashid  
Medical Superintendent  
DHQ Hospital Battagram  
29/5/87

15

14

Annex  
a R & De



# OFFICE OF THE DISTRICT HEALTH OFFICER Battagram (Khyber Pakhtunkhwa)

No. \ 28-33 / Dated 23/1/2015.

## OFFICE ORDER.

With Reference Director General Health Services Khyber Pakhtunkhwa Peshawar letter No. 3247/CC/2514/2014 Dated 14/01/2014. The enquiry recommends the following recommendation noted against each. The action is hereby initiated against the following officials mentioned against their name.

S.NO	NAME OF OFFICIAL	DESIGNATION	PLACE OF DUTY	RECOMMENDATION
✓ 1.	Ijaz Ali s/o Muhammad Khateeb	Receptionist	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
✓ 2.	Muhammad Wasim s/o Muhammad Bashir 697291	JCT Radiology	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
X 3.	Sher Ali Khan s/o Ghulam Muhammad	Malaria Supervisor	District Health Officer office	May be allowed to continue as JPHCT (MP), after verification of his documents. SSC certificate PHCT diploma. Salary may be stopped. He is directed to provide his documents for verification
X 4.	Abdul Manan Shah S/o Syed Amir	Malaria Supervisor	District Health Officer office	May be allowed as JPHCT (MP) and withdraw his order of malaria supervisor.
X 5.	Amjad Khan s/o Babu Khan	Malaria Supervisor	District Health Officer office	May serve show cause notice, stop his pay and remove form service
X 6.	Muhammad Amjad s/o Muhammad Afzal	Malaria Supervisor	District Health Officer office	May serve show cause notice, stop his pay and remove form service
✓ 7.	Sajid Ali s/o Bashir Khan 697293	JCT Physiotherapy	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
✓ 8.	Muhammad Rafiqullah s/o Muhammad Aslam	JCT Anesthesia	District Head Quarter Hospital	May be allowed to continue his service after verification of his SSC certificate PHCT diploma from Khyber Pakhtunkhwa Medical Faculty. If found fake, may be served show cause notice and remove form service.
✓ 9.	Fahim Khan s/o Muhammad Bashir 673479	Junior Clerk	District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped.
X 10.	Shahid Ali s/o Adam Khan	Junior Clerk	TBC Battagram	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped.
✓ 11.	Sayed Maqbool Shah s/o Muhammad Zahir shah 600901	Junior Clerk	District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped.
✓ 12.	Niaz Mohammad s/o Farooah 601678	Junior Clerk	District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped.
X 13.	Shah Faisal s/o Mohammad Afzal	Junior Clerk	District Health Officer office	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped.
X 14.	Dilshad s/o Said Hazrat	Store Keeper	District Health Officer Office	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped.
✓ 15.	Ihsanullah s/o Hashim Khan 684123	JCT Dental	District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped, if found bogus may be served show cause notice and stopped, the pay for removal form service.

Babu Sabir A/c. March  
prompt action  
Adia

Attested  
M

15

16

68647-

✓ 16.	Asadullah s/o Azmatullah	JCT Surgical	✓ District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
✓ 17.	Ihsanullah s/o Fazai Rahim 686272- 686273- 686330-	JCT Surgical	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement and BA Degree and Diploma till his salary must be stopped, if he failed to produce his BA degree verified may be served show cause notice and stopped his pay for removal form service.
18.	Rashid Khan s/o Ghulam Akbar Khan	JCT Surgical	✓ District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
✓ 19.	Asif Afridi s/o Abdur Rahim 686273 686274 697290-	JCT Ophthalmology	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement and verification of SSC Certificate till his salary must be stopped, if found bogus may be served show cause notice and stopped the pay for removal form service.
20.	Tazeel ur Rehman s/o Hemayatullah	JCT Ophthalmology	✓ District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
✓ 21.	Rafique Ahmed s/o Shereenzada 686275- 686276- 686277-	JCT Cardiology	✓ District Head Quarter Hospital	May be allowed to continue his service after verification of his SSC certificate PHCT diploma from Khyber Pakhtunkhwa Medical Faculty. If found fake, may be served show cause notice and remove form service. District Health Officer Battagram informed District Health Officer Swat where he has been transferred.
✓ 22.	Mufti Salahudin s/o Noor ul Wahab 686278-	JCT Physiotherapy	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement and verification of FA Certificate till his salary must be stopped, if found bogus may be served show cause notice for removal form service.
✓ 23.	Mehboobullah s/o Rai Khan 686332-	JCT Physiotherapy	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement Notice and verification of SSC Certificate, Diploma till his salary must be stopped, if found bogus may be served show cause notice for removal form service.
✓ 24.	Adil s/o Muhammad Niqab 686402-	Electrician	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement Notice and verification of SSC Certificate till his salary must be stopped, if failed to produced or found bogus may be served show cause notice for removal form service.
25.	Fasihullah s/o Sayed Sakhi Shah 686307-	Electrician	District Head Quarter Hospital EP	May be allowed to continue his service, subject to the producing of Advertisement Notice and verification of Certificate/Diploma till his salary must be stopped, if failed to produced or found bogus may be served show cause notice for removal form service.
26.	Yar Mohammad s/o Mohammad Javed	JCT Radiology	✓ District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
✓ 27.	Sirajuddin s/o Firdus Khan 686333-	JCT Radiology	✓ District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
✓ 28.	Mujeeb ur Rehman s/o Shahroom Khan 685619-	JCT Anesthesia	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement Notice and verification of Certificate/Diploma till his salary must be stopped, if failed to produced or found bogus may be served show cause notice for removal form service.
✓ 29.	Yousaf Ali s/o Fateh Khan 686334-	JCT Anesthesia	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement Notice and verification of Certificate/Diploma till his salary must be stopped, if failed to produced or found bogus may be served show cause notice for removal form service.
✓ 30.	Zahir Shah s/o Abdul Khaliq 686719-	Plumber	✓ District Head Quarter Hospital	May be allowed to continue his service, subject to the producing of Advertisement Notice and verification of Certificate/Diploma till his salary must be stopped, if failed to produced or found

16

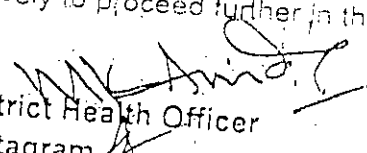
17

	691813			bogus may be served show cause notice removal form service.
✓ 31.	Sher Bahadar s/o Jan Mohammad	Generator Operator	District Head Quarter Hospital	May serve show cause notice, stop his pay remove form service
✓ 32.	Tufail Mohammad s/o Nazar Mohammad	Tube well operator	District Head Quarter Hospital	May serve show cause notice, stop his pay remove form service

District Health Officer  
Battagram

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar w/r to his letter referred above for information.
2. Medical Superintendent District Head Quarter Hospital Battagram for information with the direction to stop the pay of all officials who are drawing salary from the head of District Head Quarter Hospital Battagram with immediate effect.
3. District TB Control Officer Battagram for information and necessary action with the direction to stop the pay of all official who is drawing salary from the head of TBC Battagram.
4. District Account officer Battagram for information and necessary action.
5. Account Section office of the undersigned for necessary action.
6. All officials concerned for information with the direction to produce your academic and professional qualification certificates to the undersigned within three days positively to proceed further in the matter.

  
District Health Officer  
Battagram

18

*[Handwritten mark]*

*Anner*  
*cc E. Co*



OFFICE OF THE DISTRICT HEALTH OFFICER  
Battagram (Khyber Pakhtunkhwa)

NO. 179-85 / DATED 29/1/2015.

OFFICE ORDER.

This office order No. 128-33 dated 23/1/2015 and No.149-53 Dated 26/01/2015, is hereby withdrawn with immediate effect all the employees are exempted from disciplinary proceedings.

*[Signature]*  
District Health Officer  
Battagram

Copy forwarded to the -

1. Director General Health Services Khyber Pakhtunkhwa Peshawar for information please.
2. Deputy Commissioner Battagram for information please.
3. Medical Superintendent District Head Quarter Hospital Battagram for information and necessary action.
4. District TB Control Officer Battagram for information and necessary action.
5. Account Section office of the undersigned for necessary action.
6. District Accounts office Battagram for information and necessary action.
7. All officials concerned.

*[Signature]*  
District Health Officer  
Battagram

*Attest*  
*[Signature]*





OFFICE OF THE DISTRICT HEALTH OFFICER

Battagram (Khyber Pakhtunkhwa)

Phone & Fax 0997310507

No. 1039-40 / Dated 17/3/2015.

18

19

Annex  
in B, C, F etc.

To,

The Medical Superintendent  
DHQ Hospital, Battagram.

Subject:- ENQUIRY OF IRREGULAR APPOINTMENTS.

Dear Sir,

With reference to Director General Health Services KPK Peshawar letter No. 3247/CC/2514/2014 dated 14.11.2014 on the above cited subject.

In the light of enquiry report the following officials are recommended for removal from services, you are therefore requested to avoid them from duty and attendance till further order.

S.NO	NAME OF OFFICIAL	DESIGNATION	PLACE OF DUTY	RECOMMENDATION
1.	Ijaz Ali s/o Muhammad Khateeb	Receptionist	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
2.	Muhammad Wasim s/o Muhammad Bashir	JCT Radiology	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
3.	Sajid Ali s/o Bashir Khan	JCT Physiotherapy	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
4.	Asadullah s/o Azmatullah	JCT Surgical	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
5.	Rashid Khan s/o Ghulam Akbar Khan	JCT Surgical	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
6.	Tazeel ur Rehman s/o Hamayatullah	JCT Ophthalmology	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
7.	Yar Mohammad s/o Muhammad Javed	JCT Radiology	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service
8.	Sirajuddin s/o Firdos Khan	JCT Radiology	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service

District Health Officer  
Battagram

Copy forwarded to the:

- Director General Health Services Khyber Pakhtunkhwa Peshawar w/r to his letter referred above for information.

District Health Officer  
Battagram

Attested

			District Head Quarter Hospital	May be allowed to continue his service, subject to the producing Advertisement and BA Degree and Diploma till his salary must stopped, if he failed to produce his BA degree verified may be served show cause notice and stopped his pay for removal from service.
18.	Rashid Khan s/o	Surgical	District Head Quarter Hospital	May serve show cause notice, stop his pay and remove form service.

(20)

(19)

Amnest  
of 3/11/15



OFFICE OF THE DISTRICT HEALTH OFFICER  
Battagram (Khyber Pakhtunkhwa)

No. 1087-82 / enq: Dated 15/3 / 2015.

To

The Medical Superintendent  
District Head Quarter Hospital  
Battagram.

Subject: - ENQUIRY OF IRREGULAR APPOINTMENTS

Dear Sir,

Reference this office letter No. 1041-42/Enquiry dated 17.3.2015 on the subject above wherein S.No 01 to 04 may please be exempted from aforementioned letter due to as they has produced their documents to this office.

Similarly this office letter No. 1039-40/Enquiry dated 17.03.2015, the official at S.No. 05 and 06 may be allowed to continue their service till further order.

District Health Officer  
Battagram

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar for information.

Received

District Health Officer  
Battagram

Attested

# REGISTER FOR

27 21  
ATTENDANCE REGISTER



Annex  
H.C.

*Added*  
DHQ HOSPITAL  
BATTAGRAM

SURGICAL UNIT

(W, E, FROM 1<sup>ST</sup> APRIL 2015 ONWARD)

UNIT INCHARGE

DR NADIR SAIFULLAH KHAN

MEDICAL OFFICER SURGICAL  
DHQ HOSPITAL BATTAGRAM

Master Book Center  
16-Urdu Bazar, Lahore.

Day Attendance Register of the

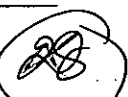
DATE AND HOURS

for the Month of

April

20 15

Serial No.	Name	Rank	DATE AND HOURS												OF ATTENDANCE												Total No. of Days	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	26	27	28	29	30	31		
1	Dr. Nadir Saif ulloh	Sergeant	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			
2	Khatceeb un Nisa	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
3	Humairi Aziz	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
4	Shagufa	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
5	Roshna Basiri	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
6	Zahida Shaheen	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
7	Navceda	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
8	Tshriat	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
9	Bibi Nooreen	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
10	Sanaun	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
11	Madina Pervaiz	C.N	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
12	Rashid Khan	OTA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
13	M. Ilyas	CT	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
14	Mujeeb ur Rehman	JCT	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
15	Abdul Nadeed	JCT	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
16	Shehraz	SMI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
17	Mubarak Rehman	UD	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
18	Sher Ali	SMI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
19	M. Iqbal	"	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
20	Amjad Ali Sadeq	"	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
21	Zab-ullah, W/O	"	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
22	Sara Dai	Dai	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
23	Hussain Zeba	Dai	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
24	Nasir Khan	o/yat	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
25	R.K. Nazim	Oi	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
26	Zahid Shabbir	SMI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
27	Prasanth Z. Sa	SMI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
28	Mu. Shabbir	SMI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		



Daily Attendance Register of the

DATE AND HOURS

for the Month of

MAY

20-15

Serial No.	Name /	Rank	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	26	27	28	29	30	31	Total No. of Days	Remarks	
1	Dr. Nadar Saifullah	Incharge	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
02	Shagufta	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
03	ChamPAT	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
04	Bushra Bashir	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
05	Zahida Shaheen	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
06	BIBI Noreen	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
07	Madiha Parveen	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
08	Ishrat	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
09	Sumaira Mumtaz	CIN	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
10	Shehnaz	FOI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		Paper
11	Rashid Khan	FOI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
12	M. Ilyas	CIA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
13	Mujeeb Rehman	JCI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
14	Abdul Wahid	JCI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
15	Mubarak Rehman	CPD	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
16	Sherv Ali	W Boy	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
17	M. Iqbal	W Boy	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
18	Amjad Ali	W Boy	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
19	Zia-ullah	W Boy	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
20	Saira	Dr.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
21	Gul Nazira	Dr.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
22	ABPA Khan	Dr.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
23	BACHI NAWAZ	CI	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
24	Zaher Shah	Supr	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
25	BACHI ZADA	Supr	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
26	M. Shabeer	Supr	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
27	Bachir	Supr	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
28	KHIZAN JAMAL	Min.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		

**Daily Attendance Register of the** (24)

DATE AND HOURS

(25)

for the Month of

June

2015

OF ATTENDANCE

Serial No.	Name	Rank	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	26	27	28	29	30	31	Total No. of Days	Remarks
1	D. R. Madan Saini	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
2	Shagufta	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
3	Shamir Taj	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
4	Bushra Rashid	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
5	Rishi Akseem	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
6	Mediha Rasim	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
7	ISHRAT	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
8	Samaira Mumtaz	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
9	Shamroz	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
10	Rasul Khan	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
11	M-ghos	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
12	Muzeb In Rehman	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
13	Ahmad Ishtiaq	A	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
14	Mubarrat Kalam	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
15	Shes Ali	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
16	M. qasid	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
17	Amjad Ali	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
18	Ria ulat wo	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
19	Saira	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
20	Gul Nazira	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
21	Abid Khan	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
22	Bakht Nawaz	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
23	Rahil Sheh	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
24	Bakht Aqda	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
25	M. Shabeer	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
26	Bakhtal	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
27	Khuzai Jamil	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	
28	Rahida Sherwan	OD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	31	

Present on 180 days  
Absence on 131 days

Daily Attendance Register of the

DATE AND HOURS

(25)

(31)

for the Month of

July

2015

OF ATTENDANCE

Serial No.	Name	Rank	DATE AND HOURS																															Total No. of Days	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	26	27	28	29	30	31		
1	Shagufta		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
2	Shami Taj		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
3	Zahida Shabeen		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
4	Guxia Kani		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
5	Khatiben-un-nisa		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
6	Naveeda		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	married Leave	
7	Madiha Pawar		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
8	M. Ghyas		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
9	Rashid Khan		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
10	Mujib-ur-Rehman		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
11	Abdul Wahid		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
12	Mubarak Rehman	OPD	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
13	Gul Nazia Dai		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
14	Bakht Nawaz		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
15	Abid Khan		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
16	Zahid Chah Sweeper		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
17	Bakht Khan	Sweeper	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
18	M. Ali Khan A.Tech		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
19	Shehnaaz Bibi		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
20	Mrs. Rafiqullah		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
21	Donia Zoha	Dai	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
22	Zia Ullah wo		Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		
23 Emr	YOUSAF ALI A.Tech	Emr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr	Pr		

(26)

DA

# Daily Attendance Register of the

for the Month of

August

2015

AND HOURS

OF ATTENDANCE

Serial No.	Name	Rank	DA AND HOURS																												Total No. of Days	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	26	27	28			29	30	31	
01	M. Dhyot.		W	L	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
02	Rashid Khan.		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
03	Mujeeb us-Selman.		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
04	Abdul Wahid.		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
05	Rafiqullah.		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
06	Zameer Jali		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
07	Shehmat Bibi		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
08	Mubarak Rehman.	OPD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
09	Abid Khan.	Evening	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W			
10	Bakht Nawaz		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
11	Zahid Shah		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
12	M. Ali		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
13	Yousuf Ali	Evening	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
14	Ziaullah w.o	Shift	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
15	Rafiqullah		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
16	Bakhtias		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
17	Shagitta		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
18	Shahni Ijaz		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
19	Zahida Shabeen		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
20	Gulra Rani.		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
21	Naveeda		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
22	Khalib un Nisa		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
23	Gull malwarai		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
24	Saira frost		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		

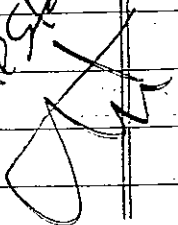


Daily Attendance Register of the

DATE AND HOURS

OF ATTENDANCE

Name	Rank	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	26	27	28	29	30	31	Total No. of Days	Remarks	
M. Akyas		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Mujeeb Khan		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Rafiq ulloh		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Abdul wahid		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Rashid Khan		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Shehnaaz bibi		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Mubarak Khan	OPD	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Rakht Nawaz		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Abid Khan		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Zahid Shah		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
M. Ali		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Yousuf Ali		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Bakhtiar		W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
Gul Nalira Durrani		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
Ubaid		A																																	

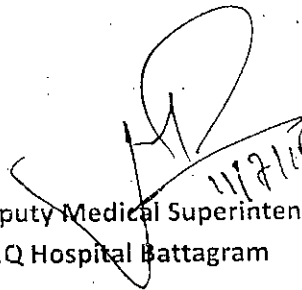
Attest  


28

35

**DUTY ROSTER OF THE MAIN OT STAFF FOR THE MONTH OF JULY 2015 + EID UL FITTER DUTY.**

Morning	Evening	Night on call
Ilyas	Yousaf Ali	Rafique Khan
Mujeeb		
Muhammad Ali		
Wahid		
Naveeda C/N		
Rashid OTA ✓		
Bakht Nawaz		
Shah Zareen		
<b>EID DUTY</b>		
Mujeeb JCT Anesthesia	17-18-19 & 20/07/2015 24 hour on call	
Ihsan OTA	17 & 18/07/2015 24 hour on call	
Rashid OTA ✓	19 & 20/07/2015 24 hour on call	

  
 Deputy Medical Superintendent  
 DHQ Hospital Battagram



38

29

**OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM**

MS Office Phone No. 0997-311518 Email Address; dhqbtg518@yahoo.com  
Casualty Dept Phone No, 0997-319010 Fax No, 0997-311518

**No, 1579-78 / Election dated 21.05.2015**

To District Health officer  
Battagram.

Subject **RESPONSE COMMITTEE / SPECIAL DUTIES ROASTER OF THE  
DOCTORS, NURSING & OTHER ALLIED STAFF DURING ELECTION  
FROM 29.05.2015 TO 31<sup>ST</sup> MAY 2015.**

Reference: Your letter No, 1700 Dated 19.05.2015.

The following response committee along with duties roster of doctors, nursing and other  
allied staff is submitted for information and further necessary action please.

**RESPONSE COMMITTEE.**

No	Name	Designation	Contact No
	Dr Muhammad Daud	Medical Superintendent DHQ Hospital Battagram	0997-311518 03219848131
	Dr Jawad Majeed Swati	MO /DMS DHQ Hospital Battagram	0997310018 03315522921
	Dr Riaz Muhammad	MO/RMO DHQ Hospital Battagram	0997310018 03018100309
	Casualty Shift Incharge	Medical officer/Casualty Medical Officer on duties	0997310018
	Fida Muhammad	Senior Clerk MS DHQ Hospital Battagram	03018138010
	Fatehullah	Computer Operator MS DHQ Hospital Battagram	03469579451

**RESPONSE TEAM FOR SURGICAL PROCEEDURE & OPERATION THEATRE COVER AT  
HOSPITAL**

No	Name	Designation	Contact No
	Dr Nadir Saifullah Khan	Surgeon DHQ Hospital Battagram	03135905118
	Khizar Jamal	Anesthesia Male Nurse DHQ H Battagram	03333577321
	Muhammad Ali	Anesthesia Tech DHQ Hospital Battagram	03453535120
	Muhammad ur Rehman	Anesthesia Tech DHQ Hospital Battagram	03025454029
	Ihsan ullah	JCT Surgical DHQ Hospital Battagram	03025647105
	Rashid Khan	JCT Surgical DHQ Hospital Battagram	03025647105

37

30

2015

DHQ Hospital Bafegam

MINOR SURGICAL  
CASES REGISTER

~~XXXXXXXXXX~~

2015

AKSD  
H

MON TH 0131 2013

Date	Adm No.	Y/A	Patient Name	Age	Sex	Disease	Operation	Surgeon	Anaesth	Asst
01/09/15	814/196	159/21	Gul Zaid 4th	50y	F	postop. Lt leg Septic Wound	Dressing	-	-	Rashid Nany 4
2/09/15	814/196	160/22	Gul Zaid 4th	50	F	"	Dressing ASB done	-	-	Rashid Nany 4
2/09/15	OPD	161/23	Hajira 3th	35	F	post op. septice wound stitches	Stitch removal	-	-	Rashid Nany 4
01/09/15	OPD	162/24	Salomon	20y	M	-	Wt + stitch	-	-	Rashid 4
5/9/15	158/20	168/25	Sonam	20y	F	-	Dressing	-	-	Rashid 4
3/9/15	OPD	164/26	Irfan	20y	M	post. Abscess	D/P	-	-	Rashid 4
3/9/15	OPD	165/27	Kamran	55y	M	septice wound	Dressing	-	-	Rashid 4
4/9/15	OPD	166/28	Gul Noor	40y	F	excised wound	Wt + stitches	-	-	Bachir 4
5/9/15	OPD	167/29	Fozheel	15y	M	-	D/P	-	-	Bachir 4
7/9/15	OPD	168/30	Usakand	36y	M	post-op Lt leg	Dressing	-	-	Michele 4
7/9/15	OPD	169/31	Waqar	91y	M	-	Remove stitches	-	-	Rashid 4
8/9/15	OPD	1670/32	Shahen Bibi	35y	F	excised wound	Dressing + Wt	-	-	Abid 4
9/9/15	OPD	168/33	Rob Nadeem	38y	M	-	Dressing	-	-	B-Nancy 4
10/9/15	OPD	169/34	Fayaz	18y	M	-	Dressing	-	-	Rashid 4
10/9/15	OPD	170/35	Nawaz	28y	M	excised wound	Wt + dressing	-	-	Rashid 4

Miss J

25

11111111

39

32

2015

DHR Hospital Battagram

MAJOR SURGICAL

CASES REGISTER

~~2015~~

2015

Major Surgical  
 Cases Register  
 2015

Handwritten signature or initials, possibly "Ali" or "Ali Shah", with a large flourish below it.

488

33

DATE	ADD #	Y/M	DI	Pt NAME	Age	Sex	Disease	Surgery	Surgeon	Assistant	Anesthetic/Injections	Sign
26/05/15	155/25	138/23		Momen Khan	45y	M	hernia	Mesh Repair	Dr. Nadeer	Abid	myo abs / spinal	M
26/05/15	152/27	138/24		Roman	16y	M	Appendix	Appendectomy	Dr. Nadeer	Rashid	myo abs / GA	M
26/05/15	109/23	139/25		Naveed	03y	M	Hernia stone	Hernioplasty	Dr. Nadeer	Abid	myo abs / GA	M
26/05/15	106/20	140/26		Zusar Sam	50y	F	Baldy	Baldy	Dr. Nadeer	Shah.m	myo abs / spinal	M
27/05/15	111/25	141/27		Zaidun-Nisa	32y	F	hernia	Hernioplasty	Dr. Nadeer	Shah.m	Iyes / GA	M
28/05/15	112/26	142/28		Taj meena	32y	F	hernia	Hernioplasty	Dr. Nadeer	Shah.m	Iyes / GA	M
28/05/15	113/27	143/29		Lhababa	10	F	R/Polyp	R/Polyp	Dr. Nadeer	Abid	Iyes / GA	M
28/05/15	114/28	144/30		Abdul Basit	04	M	R/Polyp	R/Polyp	Dr. Nadeer	Ibrahim	Kuzin / GA	M
JUNE 2015												
16/06/15	95/31	145/11	01	Rubada	25y	F	pregnancy	Elective Caesarian	Dr. Binazala	Assistant	Etiyas / GA	M
11/07/15	117/02	146/20	01	Neelam	24y	F	osteomyelitis		Dr. Jawad		GA / myo abs	M
10/08/15	1226/57	147/3	-1	Ary Passo	32y	F		C-section	Dr. Shagala	Rashid	spinal / myo abs	M
26/08/15	139/50	148/4	01	Sakayat	25y	F		C-section	Dr. Shagala	Rashid	spinal / myo abs	M
14/09/15	137/31	149/5	01	Sakreena	24y	F		C-section	Dr. Shagala	Rashid	spinal / myo abs	M
09/09/15	139/49	150/6	01	Rogemg	26y	F		C-section	Dr. Shagala	Rashid	spinal / myo abs	M

(34)

Annex  
59



**OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM**

MS Office Phone No. 0997-311518 Email Address; dhqbtg518@yahoo.com  
Casualty Dept Phone No, 0997-310018 Fax No, 0997-311518

No, 2996-99100 dated 11.09.2015

**OFFICE ORDER**

WHEREAS, Mr. Rashid Khan S/O Ghulam Akbar Khan JCT Surgery BPS-09 attached to DHQ Hospital Battagram was proceeded against under the E&D Rules 2011 for the charges mentioned below:-

4. YOU HAVE BEEN APPOINTED IN VIOLATION OF THE RULES /STANDERED CRITERIA OF THE GOVT:- AND THERE FORE GUILTY OF MISCONDUCT AS PROVIDED UNDER RULE-2 SUB PARA K (VI) OF THE E&D RULE 2011

AND WHEREAS, a show cause notice was served upon him vide this office letter No. 2534-36 dated 23.07.2015 wherein major penalty of Removal from service was proposed to be imposed upon him.


AND WHEREAS he has not submitted reply to the show cause notice nor he presented himself for personal hearing, seems that he has nothing in his defense. He could not prove himself as innocent nor he bothered to appear for personal hearing.

NOW WHEREAS, I, the undersigned being the competent authority in exercise of powers conferred under the Khyber Pakhtunkhwa Peshawar E&D Rules 2011, am pleased to impose major penalty of removal from service upon Mr. Rashid Khan S/O Ghulam Akbar Khan JCT Surgery BPS-09 with immediate effect..

Sd/xx xx xx  
Medical Superintendent  
DHQ Hospital Battagram

No.& date even above;-  
Copy forwarded to the:-

1. Director General Health Service Khyber Pakhtunkhwa Peshawar.
2. DAO Battagram.
3. Accountant DHO Office Battagram.
- ✓ 4. Mr. Rashid Khan S/O Ghulam Akbar Khan JCT Surgery BPS-09 DHQ Hospital Battagram for information and necessary action.

  
11/09/15  
Medical Superintendent  
DHQ Hospital Battagram



## بخدمت جناب ڈائریکٹر جنرل محکمہ صحت خیبر پختون خواہ پشاور

عنوان: حکمانہ اپیل برخلاف آفس آرڈر نمبر 99/00-2996 مورخہ 11/09/2015 فاضل میڈیکل سپرنٹنڈنٹ

DHQ ہسپتال بنگرام جس کی رو سے اپیلانٹ کو سروس سے برخاست (Remove) کیا گیا۔

جناب عالی موجودہ اپیل ذیل ہیں۔

۱۔ حکم زیر اپیل مورخہ 11/09/2015 غلط، خلاف قانون اور بدوں اختیار ہے۔

۲۔ یہ کہ فیصلہ زیر اپیل قیاسات اور منروضات پر مبنی ہے اور قانون فطرت کے خلاف ہے۔

۳۔ یہ کہ فاضل ایم۔ ایس نے اپنے اختیارات کو درست طور پر استعمال نہیں کیا ہے اور متدعو یہ آرڈر میں sufficient reasons نہیں دی ہیں۔

۴۔ یہ کہ حکم متدعو یہ servecis laws اور متعلقہ رولز کے خلاف ہے اور کہ متن آرڈر مذکور غلط ہے۔

۵۔ یہ کہ اس وقت کے EDO بنگرام نے روزنامہ آج و مشرق پشاور میں 05/11/2011 کو سیریل نمبر 2 پر JCT سر جیکل کی

پوسٹ مشہر (Advertise) کی ہے۔

یہ کہ سیکشن کیلئے "ڈیپارٹمنٹل سلیکشن کمیٹی" تشکیل دی گئی اور اپیلانٹ بشمول دیگر متعدد افراد نے مذکورہ اسامی کیلئے درخواستیں دی۔

یہ کہ DSC نے بمطابق اشتہار صرف شارٹ لسٹ امیدواروں سے انٹرویو لیا اور ان کی مطلوبہ کاغذات کی جانچ پڑتال کی، اور

مطلوبہ قابلیت کے حامل صرف 3 امیدواروں کو اہل پا کر ان کی بھرتی حسب ضابطہ عمل میں لائی گئی اور اپیلانٹ کو

مورخہ 28/05/2012 کو اپوائنٹمنٹ لیٹر جاری کر دیا گیا اور اپیلانٹ نے حسب ضابطہ چارج لیا اور تا برخاستگی اپنی

ڈیوٹی احسن طریقے سے سرانجام دیتا رہا۔

۶۔ یہ کہ حکم متدعو یہ فاضل ایم۔ ایس کے اپنے ہی احکامات اور سفارشات کے برعکس ہے۔

۷۔ یہ کہ مورخہ 23/01/2015 کو بروئے آرڈر نمبر 33-128 اس وقت کے DHO بنگرام جو کہ M.S ڈی۔ ایچ۔ کیو

ہسپتال بنگرام بھی تھے انہوں نے اپیلانٹ بشمول دیگر کی تنخواہ بند کی تھی، مگر بعد ازاں بروئے آرڈر نمبر 85-179 مورخہ

29/1/2015 کو اپنا سابقہ آرڈر مورخہ 23/1/2015 with draw کر دیا، لیکن اس کے باوجود بغیر کسی آرڈر کے اپیلانٹ

سے 9 مہینے تک بغیر تنخواہ کے ڈیوٹی لی گئی۔

۸۔ یہ کہ اپیلانٹ کے کاغذات و اسناد کی حسب ضابطہ محکمہ ہڈانے و ریٹیفیکیشن کروائی جو کہ درست پائے گئے۔

۹۔ یہ کہ فیصلہ پشاور ہائی کورٹ 11/04/2012 در WP No 3969/2010 بعنوان۔ حسن عباس Versus ڈاکٹر سراج

سیکرٹری میڈیکل نیکلٹی KPK پشاور کی رو سے بھی اپیلانٹ مطلوبہ قابلیت برائے JCT سر جیکل پر پورا اترتا ہے۔

Amex  
JCT

یہ کہ نام و نہاد انکوائری غلط، خلاف قانون، بدوں اختیار اور سر و سرزور لڑکی رو کے خلاف تھی اسی وجہ سے وزیر اعلیٰ، سیکرٹری صحت اور جناب عالی نے بھی انکوائری مذکورہ پر عمل درآمد روکنے کے احکامات صادر کئے تھے۔

یہ کہ باوجود اس کے اپیلانٹ کی تنخواہ 9 مہینے تک (جنوری سے ستمبر 2015) بغیر کسی معقول وجہ کے بند کر دی گئی اور اپیلانٹ سے بغیر تنخواہ کے 9 مہینے ڈیوٹی لی گئی اور صرف اسی پر اکتفا نہیں کیا گیا بلکہ اس دروان اپیلانٹ کے خلاف بلا کسی قانونی دلیل کے نوکری سے برطرفی کا شوکا ز نوٹس بھی جاری کر دیا گیا۔

یہ کہ اس کے بعد اپیلانٹ نے انصاف کی فراہمی کے لئے جناب عالی کے خدمت میں اپیل کی جس پر مذکورہ شوکا ز نوٹس جاری کرنے والے M.S نے بھی ذیل الفاظ میں جناب عالی کو اپیلانٹ کے حق میں فیصلہ کرنے کی سفارش کی۔

"sympathetic & favorable consideration please etc"

لیکن بد قسمتی سے جناب کی طرف سے اپیلانٹ کے اپیل کا کوئی جواب نہیں آیا۔

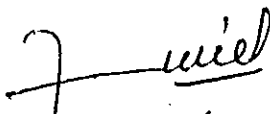
یہ کہ اس کے بعد اپیلانٹ نے مورخہ 10/09/2015 بروز جمعرات شوکا ز نوٹس کا جواب دیا مگر فاضل آفیسر ماتحت نے اسے زیر غور نہیں لایا۔


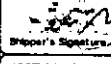
یہ کہ اپیلانٹ کو summary of alligation و انکوائری نہیں دی گئی ہے نہ ہی جرحہ کا موقع دیا گیا ہے اور نہ ہی سنا گیا اور نہ ہی نام و نہاد انکوائری سے اپیلانٹ کو باخبر رکھا گیا ہے۔

یہ کہ مورخہ 27/07/2015 کو فاضل آفیسر ماتحت نے جناب عالی کو اپیلانٹ کے حق میں فیصلہ کرنے کی سفارش بھی کی اور باوجود اس کے مورخہ 11/09/2015 کو اسی آفیسر ماتحت نے اپیلانٹ کو سروس سے غلط طور پر برطرف کر دیا۔ یہ کہ مندرجہ بالا تمام ضروری اور قابل غور جملہ کاغذات جناب عالی کی خدمت میں اپیل کے ہمراہ لف ہیں۔

لہذا استدعا ہے کہ اپیل منظور فرما کر حکم متدعو یہ برطرفی نمبر 2996-99/00 مورخہ 11/09/2015 کو مسترد فرمایا جائے اور اپیلانٹ کو سروس پر بحال کر کے مشکور فرمایا جائے۔

العارض

  
راشد خان JCT سر جیکل DHQ ہسپتال، بنگرام

		Acct / Coupon No.		Consignment Note No.		<b>Sales Tax Invoice</b>	
		Mode of Payment <input type="checkbox"/> Coupon <input type="checkbox"/> Foc <input type="checkbox"/> 0000 <input type="checkbox"/> Account <input type="checkbox"/> Cash		Insured <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Dimension L(cm) W(cm) H(cm)	
Call: 111-123-456 GST NO. 12-00-9808-002-73		From (Shipper) PASHAN LITAN		To (Consignee) CUG FMB ALI		Org. Dest. N/A N/A	
Shipper's Copy I warrant that I have read the terms and conditions on the reverse of this consignment-note and that all details given herein are true and correct. I further declare that the contents of this consignment note is prima facie evidence of the conclusion of contract between shipper & TCS (PVT) LTD.		Phone NONE		Phone NONE		Wt. (kgs) Pcs. 0.5 1	
Shipper's Signature 		E-mail P.B.W.		Description PICKUP INFORMATION		Service Type <input type="checkbox"/> Overnight <input type="checkbox"/> Holiday <input type="checkbox"/> Extra Sp. <input type="checkbox"/> Same Day <input type="checkbox"/> Second Day	
AS PER P.O. ACT 1993, TCS WILL NOT CARRY LETTER POSTCARD.		Courier Code 9570		Date 9/2/00		Service Charges Weight Handling Other GST Insurance Premium	
						TOTAL 150	

w/k  
 Ammer

38

DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.  
Office Ph : 091 - 9210269 Exchange : 091 - 9210187, 091 - 9210196 Fax : 091 - 9210230

No 2717-20 /CC/2511/2014

Dated 8 /09/2014

Annex  
u L<sup>ic</sup>

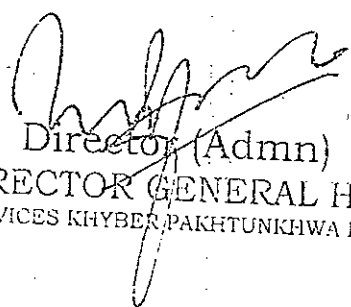
MOST IMMEDIATE

To,

1. Dr. Niaz Muhammad SMO,  
Civil Hospital Battal District Manshera.
2. Mr. Muhammad Jamil,  
Assistant Director(P-II), DGHS Office Peshawar.

SUBJECT: OFFICE ORDER.

I am directed to refer of this DGHS office Order bearing endorsement No.647-53/CC/2511/2014 dated 14-04-2014 on the subject noted above with the remarks to proceed to Battagram for examination /Scrutiny of the remaining documents of the candidates appointed by DHO Battagram prior to 01/07/2013.

  
Director (Admn)  
DIRECTOR GENERAL HEALTH  
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

5/9/14

Cc:

Copy forwarded to the:

1. District Health Officer Battagram for information and to make available all the relevant record to the enquiry committee.
2. Medical Superintendent DHQ Hospital Battagram for information and necessary action w/r to DHO Battagram letter No.8756-58 dated 01/09/2014, he is directed to provide the relevant record to DHO Battagram within 03 days without fail.

ENQUIRY REPORT INTO THE ALLEGED IRREGULARITIES IN THE RECRUITMENT  
PROCESS OF PARAMEDICS/OTHER CLASS-III STAFF AND CLASS-IV EMPLOYEES IN  
THE OFFICE OF THE DISTRICT HEALTH OFFICER BATTAGARAM.

BACK GROUND.

Vide Director General Health Services Khyber Pakhtunkhwa office order bearing endorsement<sup>TM</sup> No.647-53/complaint cell-2514 dated 14/4/2014 an inquiry committee comprising Dr.Niaz Muhammad SMO CH Battal and Mr. Muhammad Jamil Assistant Director (Personnel-II) Directorate General Health Services Khyber Pakhtunkhwa Peshawar has been constituted to probe the alleged irregularities in the recruitment process of the employees in Department of Health District Battagram (F/A)

PROCEEDINGS

The Committee proceeded to Battagram on 23/04/2014 and remained there upto 26/4/2014. The Committee scrutinized the relevant record pertaining to recruitments made by Dr. Aqeel Bangash and Dr. Shehzad Ali Khan Ex-DHOs Battagram for the periods with effect from 1/7/2013 till their tenures.

This is worthwhile to mention that merit lists and documents pertaining to the recruitment issued by Dr.Aqeel Bangash Ex-DHO Battagram prior to 1-7-2013 were not produced by the DHO Office Battagram; saying that the same were taken away by the Ex-DHO Dr.Aqeel Bangash as per their written statements mentioned below. On enquiry from Dr.Aqeel Bangash, although he produced photo copies of the merit lists at F/B but showed ignorance about the documents.

While forwarding the previous Enquiry Report, the District Health Officer Battagram was asked vide DGHS letter No.1206-09/Complaint Cell/2511/2014 dated 29<sup>th</sup> May 2014 for producing the remaining documents pertaining to recruitments of Class-III and Class-IV employees made by Dr.Aqeel Bangash the then DHO for the period prior to 1-7-2013 within fifteen days. But after protracted correspondence with the District Health Officer Battagram, he

has been able to produce the documents ibid that is too in piecemeal upto 10<sup>th</sup> October 2014.

FINDINGS.

The Committee after scrutiny found various irregularities in the recruitment process which are mentioned below:-

unfair merit list

- Format of the merit list is not according to the standard criteria of the Government.
- As required under the relevant criteria of the Government at Flag-C, Diploma marks not included in the merit list after the marks of prescribed qualification i.e. matric. More so the marks allotted for the prescribed qualification were not according to standard criteria, e.g. certain candidates with 2<sup>nd</sup> division were allotted the marks of first division and vice versa. In certain cases marks for higher qualification have been given to the candidates although no documentary proof was produced in this regard to the Enquiry Committee which makes selection/recruitment of some of the candidates doubtful.
- Written test marks included in the merit list in violation of the approved Service Rules.
- In some cases more than 8 marks allotted to the candidates in the column of interview marks, in violation of the criteria fixed by the Government.
- Experience marks are not given as per Government criteria and in some cases experience marks are given on the basis of experience certificates of unregistered private institutions; even in some cases marks given without experience certificate.
- Minutes of the Departmental Selection Committees duly signed by chairman and members of the DSC, are not recorded.
- Candidates in various categories have been recruited by Dr. Aqeel Bangash without valid certificates/diplomas.
- Class-IV employees have been appointed by the Ex-DHO viz: Dr. Aqeel Bangash without inviting applications through employment exchange (not available in District Battagram) or press advertisement.
- Ward Ayas (nomenclature thereof not available in the sanctioned strength of District Battagram) have been appointed by Dr. Aqeel Bangash against the posts of Dais without observance of codal

formalities which is again violation of the rules/regulations and policy of the Government. The Committee noted with concern as to how their salaries have been allowed by the DAO Battagram.

As a matter of fact the educational qualification/technical diplomas etc of paramedics are required to be verified by the concerned Board of Intermediate and Secondary Education and Khyber Pakhtunkhwa Medical Faculty Peshawar. To the utter surprise of the committee, salaries of all paramedics/other employees have been activated without verification from the above institutions.

In spite of the fact, meeting of the DSC was attended and merit list signed by the Representative of DCO Battagram and representative of the DG Health Services, but none of them were able to pin point the irregularities mentioned above.

who was this fellow

CONCLUSION

Dr.Aqeel Bangash ex-District Health Officer District Battagram is responsible for the irregular recruitments and a warning in this regard has already been issued to him.

only warning + what about the wrong selectees?

RECOMMENDATIONS

In view of the foregoing the Enquiry Committee recommends action against various categories of employees as mentioned against each below:-

S.No	Nomenclature of the post	Names of employees appointed.	Observation of the Committee	Recommendation
1	Receptionist (merit list at Annex: I)	Ijaz Ali s/o Muhammad Khateeb(Battagram) Merit list at Annexure-I	a) BA marks added in the column of higher qualification but BA degree not produced. b)As per matric certificate, the Official has got 2 <sup>nd</sup> divn:but marks given of 1st divn: c) Matric certificate not verified from the concerned	If the marks of prescribed/higher qualification irregularly added in the merit list are deleted, another candidate in the merit list would have been eligible for selection.

			Board of Intermediate and Secondary Education, but salary started.	Therefore, show cause notice may be served upon Mr. Ijaz for removal from service and his salary stopped.
2	JCT Cardiology (Merit list at Annex:II)	Muhammad Wasim s/o Muhammad Bashir (Battagram) Merit list at Annexure-II	a) Marks for higher qualification allotted two step above while the employee has qualified FA (one step above) b) No certificate/diploma in Cardiology produced from Medical Faculty KPK Pesh:	Beside irregularity at Sl:No.a of the observations, Muhammad Wasim has been appointed without having been qualified from the Medical Faculty; he may be served upon with show cause notice for removal from service and his salary stopped.
3	Malaria Supervisors (Merit list at Annex:III)	i. Sher Ali Khan s/o Ghulam Muhammad (Battagram)	He is matric with science and possess diploma from the Medical Faculty Peshawar.	May be allowed to continue service as Jr.PHC Tech (MP) being qualified but after verification of his matric certificates etc. and diploma from the Medical Faculty Peshawar. Till then his salary must be stopped and if found fake, show cause notice may be served upon him for removal from

*clear documents verified*



43

⊕

	Malaria Supervisors (Merit list at Annex:III)	ii. Abdul Manan Shah s/o Syed Amir Nawab Shah (Battagram)	a) No documents produced to the Enquiry Committee. b) He was already serving as Insect Collector but again applied for Malaria Supervisor and subsequently appointed in contravention of the approved S/Rules.	service. As per revised service structure of Paramedics notified in 2006, the post of insect collector has since been re-nomenclatured as Jr.PHC Tech:(MP), therefore, he may be allowed to continue as Jr.PHC Tech:(MP) and his irregular recruitment order as Malaria Supervisor withdrawn
	Malaria Supervisors (Merit list at Annex:III)	iii. Amjed Khan s/o Babu Khan (Battagram)	Recruited in violation of the Approved S/Rules & without valid diploma from Medical Faculty Peshawar.	May be served upon show cause notice for removal from service and salary stopped.
	Malaria Supervisors (Merit list at Annex:III)	iv. Muhammad Amjed s/o Muhammad Afzal (Battagram)	Recruited in violation of the Approved S/Rules & without valid diploma from Medical Faculty Peshawar.	May be served upon ✓ show cause notice for removal from service and salary stopped.
4	JCT(Physiotherapy) Merit list at Annex:IV	Sajid Ali s/o Bashir Khan (Battagram)	a) Matric with arts (science required) b) No valid diploma from Medical Faculty Peshawar.	May be served upon show cause notice for removal from service and salary stopped.
5	JCT Anaesthesia	Muhammad Rafiqullah Khan	Matric* with science with valid diploma from Medical	May be allowed to continue service

	Merit list at Annexure-V	s/o Muhammad Aslam Khan(Bannu)	Faculty Peshawar, albeit not verified.	but after verification of the matric certificate and diploma from the concerned Board and Medical Faculty Peshawar. If found fake, should be served upon with Show Cause notice for removal from service.
6	Junior Clerks Merit list at Annexure-VI	i.Fahim Khan s/o Muhammad Bashir (Battagram) ii.Shahid Ali s/o Adam Khan(Battagram) → iii.S.Maqbool Shah s/o S.Muhammad Zahir Shah(Battagram) iv.Niaz Muhammad s/o Muhammad Faroosh(Battagram) v.Shah Faisal s/o Muhammad Afzal (Battagram)	a) Matric certificates of all the employees perused but not verified from the concerned Boards. b) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of the Matric Certificates, till then their salaries must be stopped.
7	Store Keeper	Dilshad s/o Said Hazrat	a) He was in-service Sweeper but his matric and dispenser	May be allowed to continue service

	Merit list at Annexure-VII	(Battagram)	Certificates seem to be doubtful. b) ) Advertisement for the post not produced.	subject to producing of advertisement notice by the DHO Battagram and verification of both the certificates and if found bogus, may be served upon show cause notice for removal from service. Till then his salary must be stopped.
> 8	JCT Dental Merit list at Annexure-VIII	Ihsanullah s/o Hashim Khan (Battagram)	a) Matric with science with diploma from Medical Faculty Peshawar and <u>BA</u> qualification but not verified b) ) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of <u>certificate, diploma and degree</u> and if found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.
9	JCT Surgical Merit list at Annexure-IX	i. Asadullah s/o Azmatullah (Mansehra)	a) Matric with science having no valid diploma b) ) Advertisement for the post not produced.	May be served upon with show cause notice for removal from service and salary stopped.

		ii. Ehsanullah s/o Fazal Rahim (Battagram)	<p>a) Matric with science 2<sup>nd</sup> divn: marks allotted of first divn:</p> <p>b) Zero marks given in the interview, even then selected.</p> <p>c) Although qualified OTA from Medical Faculty Peshawar, yet the certificate seems to be fake.</p> <p>d) 8 marks for higher qualification allotted but no BA degree produced.</p> <p>e) ) Advertisement for the post not produced.</p>	<p>May be allowed to continue service subject to producing BA degree/advertisement notice by the DHO Battagram &amp; verification of certificate/diploma and if failed to produce BA degree/advertisement notice or the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.</p>
		iii. Rashid Khan s/o Ghulam Akber Khan (Battagram)	<p>a) No valid certificate/diploma from Medical Faculty Pesh: Even not selected by the DSC but favoured with recruitment order by Dr. Aqeel Bangash.</p> <p>b) ) Advertisement for the post not produced.</p>	<p>May be served upon show cause notice for removal from service and salary stopped.</p>
10	JCF Ophthalmology Merit list at Annex: X	i. Asif Afridi s/o Abdur Rahim (Battagram)	<p>a) He has been selected on the basis of having <u>degree in vision science from KMU</u> Peshawar but the same has not been verified.</p> <p>b) ) Advertisement for the post not produced.</p>	<p>May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of</p>

				Matric certificate/ degree and if found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.
	JCT Ophthalmology Merit list at Annex:X	ii.Tanzeelur Rahman s/o Himayatullah (Battagram)	a)No diploma from Medical Faculty Peshawar. b) BA degree not produced but marks for higher qualification allotted. c) Advertisement for the post not produced.	May be served upon with show cause notice for removal from service and salary stopped.
11	JCT Cardiology Merit list at Annexure-XI	ii.Rafique Ahmad s/o Sherenzada (Swat)	a)No recruitment order produced. b)Matric with science having diploma from Medical Faculty Peshawar. c)According to Feroz Sr.Clerk of DHO Office Battagram the Tech: has been transferred to Swat. d) ) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram & verification of matric certificate, diploma and degree and if found bogus, must be served upon show cause notice for removal from service. Till then his salary must be stopped. DHO Battagram to inform the DHO/MS Swat where he has been transferred.

7

12	JCT Physiothera py Merit list at Annex:XII	i. Mufti Salahuddin s/o Noorul Wahab (Battagram)	a) Matric with science having diploma from Medical Faculty Peshawar but the same seems suspicious. b) 6 marks for higher qualification allotted but FA certificate not produced. c) Advertisement for the post not produced.	May be allowed to continue service subject to producing of FA certificate/Advertis ement notice by the DHO Battagram and verification of certificate/diploma and if failed to produce FA certificate or the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.
		ii. Mehboobulla h s/o Rai Khan (Karak)	a) Matric with science . b) Diploma of Med: Faculty produced, seems fairly bogus c) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of certificate/diploma. If found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.

13	Electrician Merit list at Annexure- XIII	i. Adil s/o Muhammad Niqab (Battagram)	a) advertisement for the post not produced. b) 8 marks for higher qualification allotted but BA degree not produced.	May be allowed to continue service subject to producing of advertisement notice by DHO Battagram and verification of matric certificate etc. If failed to produce the advertisement notice, must be served upon show cause notice for removal from service. Till then his salary must be stopped.
		ii. Fasiullah s/o Syed Sakhi Shah (Battagram)	a) Matric certificate and BA degree produced but not verified as yet. b) Advertisement for the post not produced.	May be allowed to continue service subject to producing of Advertisement notice and verification of certificate/diploma. If failed to produce the advertisement notice by DHO Battagram and the documents found bogus, must be served upon with show cause notice for removal from service. Till then his

				salary must be stopped.
14	JCT Radiology Merit list at Annexure-XIV	i.Yar Muhammad s/o Muhammad Javed (Battagram)	a) Matric with science with no valid diploma. b) Advertisement for the post not produced.	May be served upon show cause notice for removal from service and salary stopped.
		ii.Sirajuddin s/o Firdus Khan (Mansehra)	a) Matric with science with no valid diploma. b) Advertisement for the post not produced.	May be served upon show cause notice for removal from service and salary stopped.
15	JCT Anaesthesia Merit list at Annexure- XV	i.Mujeebur Rahman s/o Shahroom Khan (Battagram)	a) Matric with science with diploma from Med: Faculty Peshawar but not verified as yet. b) 12 marks for higher qualification allotted but MA degrees not produced. c) Advertisement for the post not produced.	May be allowed to continue service subject to producing of Advertisement notice by DHO Battagram and verification of certificate/diploma. If failed to produce the advertisement notice and the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.

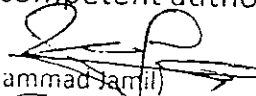


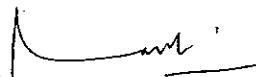
		ii. Yousaf Ali Khan s/o Fateh Khan (Battagram)	a) Matric with science with certificate from Med: Faculty Peshawar, but not yet verified. b) Advertisement for the post not produced.	May be allowed to continue service subject to producing of Advertisement notice by DHO Battagram and verification of certificate/diploma. If failed to produce the advertisement notice and the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.
16	Plumber Merit list at Annex:XVI	Zahir Shah s/o Abdul Khaliq (Battagram)	a) Matric with arts. b) No advertisement for the post produced.	May be allowed to continue service subject to producing of Advertisement notice by DHO Battagram and verification of certificate/diploma. If failed to produce the advertisement notice and the documents found bogus, must be served upon with show cause notice for removal from

				service. Till then his salary must be stopped.
17	Generator Operator Merit list not produced.	Sher Bahadur s/o Jan Muhammad (Battagram)	a) No advertisement notice, no merit list and no documents produced.	May be served upon with show cause notice for removal from service and salary stopped.
18	Tube Well Operator Merit list not produced	Tufail Muhammad s/o Nazir Muhammad (Battagram)	a) No advertisement notice, no merit list and no documents produced.	May be served upon with show cause notice for removal from service and salary stopped.
19	Class-IV employees Merit list not produced	As per list at Annexure <del>XVII</del>	a) No advertisement notice, no merit list and no documents produced.	May be served upon with show cause notice for removal from service and salary stopped.

Interestingly salaries of the above employees are being disbursed from the date of their recruitment but surprisingly the offices of the present DHQ Battagram and MS DHQ Hospital Battagram badly failed to produce the relevant documents to the Enquiry Committee, resulting in late submission of the enquiry report.

The above recommendations are submitted for perusal and approval or as the competent authority deems fit.

  
(Muhammad Jamil)  
Assistant Director (P-II)  
Directorate General Health  
Services, Khyber Pakhtunkhwa  
Peshawar.

  
(Dr. Niaz Muhammad)  
SMO, Civil Hospital Battal District Manshera.

52-A

PRINTED TO ORDER

PKF NO. 10052 0519210/18

Oct. 25 2006 05:27PM FI



**CHIEF MINISTER'S SECRETARIAT  
KHYBER PAKHTUNKHWA  
PESHAWAR**

No. SO-II/CMS/KPK/1-1/2014

Dated: Peshawar the 08<sup>th</sup> December, 2014.

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Health Department,  
Peshawar.

Subject: REQUEST FOR REINSTATEMENT OF PARAMEDICS STAFF.

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith a copy of an application submitted by Paramedics Staff District Batagram. The Honourable Chief Minister has been pleased to record the following remarks thereon:-


**"Secretary Health**

**Please PU report + no action till further orders".**

It is therefore, requested that necessary action in the matter may kindly be taken accordingly.


Encl: As above.

Yours Faithfully,

  
**(MUHAMMAD TAUFIQUE)**  
SECTION OFFICER-II

Copy to the:-

1. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.

  
SECTION OFFICER-II

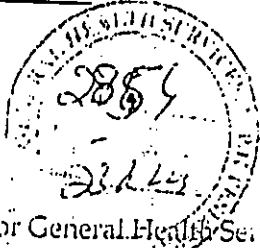


52-B

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

59 ①  
B. atagram

TOP PRIORITY/IMMEDIATE



No. SO(Secret)/HD/4-4/2014/Dec  
Dated Peshawar, the 15<sup>th</sup> December, 2014.

To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

20/12/14

Subject:

REQUEST FOR REINSTATEMENT OF PARAMEDICS STAFF.

I am directed to refer to the subject noted above and to forward herewith a copy of letter No. SO-II/CMS/KPK/1-1/2014/12826 dated 08.12.2014 received from Chief Minister Secretariat, Khyber Pakhtunkhwa, for necessary action in the matter may kindly be taken accordingly.

Encl: as above.

*Akbar Khan*

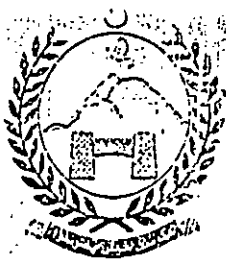
(Akbar Khan)  
Section officer (Secret/Comp)

Endst: No & date even.

Copy forwarded to:-

1. Section Officer-II, Chief Minister Secretariat, Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. PS to Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.

Section officer (Secret/Comp)



B- (S-10)

**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUN KHWA PESHAWAR.**

E-Mail Address: [ewh@dghs@yahoo.com](mailto:ewh@dghs@yahoo.com) Office Ph# 091-9210209 Exchange# 091-9210187, 9210196 Fax # 091-9210230

NO. 137 /AE-VI.

Dated. 13/01/2015

The District Health Officer,  
Battagram.

Subject: - REQUEST FOR RE-INSTATEMENT OF PARAMEDICS STAFF.  
Memo.

I am directed to forward a copy of the Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar letter No. SO(Secret)HD/4-1/2014/DEC dated 15.12.2014 alongwith its enclosures which is self explanatory on the subject noted above for information and necessary action with the request to offer your detailed comments in this regard.

ASSISTANT DIRECTOR (F-III)  
DGHS, KHYBER PAKHTUNKHWA  
PESHAWAR

13/1/2015

Copy forwarded to the Section Officer (Secret/Comp) Govt. of Khyber Pakhtunkhwa Health Department Peshawar for information w/r to his letter referred to above.

ASSISTANT DIRECTOR (P-III)  
DGHS, KHYBER PAKHTUNKHWA  
PESHAWAR

(53)



**OFFICE OF THE DISTRICT HEALTH OFFICER  
Battagram (Khyber Pakhtunkhwa)**

No. 1763-63 / Dated 17/6 /2015.

To,

The Director General Health,  
Services Khyber Pakhtunkhwa Peshawar

*Annex*  
LI

Subject:-

**ENQUIRY OF IRREGULAR APPOINTMENTS.**

Sir,

Reference your letter No. 3247/CC/2514/2014 dated 14.11.2014 on the subject above.

It is stated that in light of recommendation of enquiry report based on observation of committee at S.No09 page No. 08 of said enquiry report Mr. Rashid Khan S/O Ghulam Akbar JCT (Surgical) was recommended, **(May be served upon show cause notice for removal from service and salary stopped).**

The certificate of above noted employee sent to Secretary Medical Faculty Khyber Pakhtunkhwa Peshawar vide this office No. 883-84 dated 4.3.2015 for verification the same received back with the remarks that the certificate **verified** vide Khyber Pakhtunkhwa Medical Faculty Peshawar No. 1245/MF dated 26.03.2015.

In the light of Medical faculty letter No cited above the observation of enquiry committee are not valid, and the undersigned is unable to decide this matter. You are therefore requested to guide the undersigned in this regard either his services should be continue or terminated on the recommendation of enquiry report.

District Health Officer,  
Battagram.

Copy forwarded to the Medical Superintendent DHQ Hospital Battagram for information and necessary action.

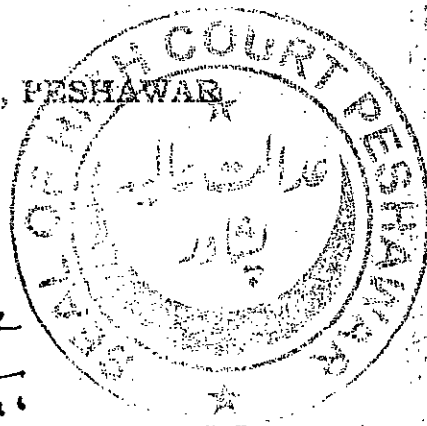
*S.ullahab*

District Health Officer,  
Battagram.

*m*

(54)

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR



C.O.C No. \_\_\_\_\_/2010

In

Writ Petition No. 2377/2010

*Annoes*  
"L2"

Hassan Abbas S/O Aashiq Ah

Permanent resident of Village Topaki, Tehsil and P.O Sadda  
Kuzman Agency, presently residing at House No.790-B, Street  
No.34, Sector D-4, Phase-I, Hayatabad, Peshawar.

... Applicant/ Petitioner

Versus

Dr. Siraj, Secretary, Medical Faculty, Abdara Road, University  
Town Peshawar. .... Respondent

APPLICATION FOR INITIATION OF CONTEMPT  
PROCEEDINGS AGAINST (DR. SIRAJ) SECRETARY,  
MEDICAL FACULTY, ABDARA ROAD, UNIVERSITY  
TOWN PESHAWAR.

Respectfully Sheweth:-

1. That the applicant/ petitioner was selected as Lab Technician by the Agency Surgeon at Headquarter Hospital Para-Chinar with the condition that he would produce a certificate of registration to be issued by Medical Faculty Peshawar.
2. That accordingly the applicant/ petitioner applied to the Secretary Medical Faculty for issuance of registration certificate but the matter was delayed for

**ATTESTED**

EXAMINER  
Peshawar High Court.

several months which compelled the applicant/ petitioner to approach this Hon'ble Court by filing a writ petition No.2377/2010.

- 3. That the above mentioned writ petition came up for hearing before this Hon'ble Court on 22.06.2010 and was disposed off with the direction that the Secretary will dispose of the application of the applicant/ petitioner within the period of ten days. (Copy of the order is attached).
- 4. That the applicant/petitioner immediately produced the copy of the above mentioned order of this Hon'ble Court to the respondent/ contemnor and subsequently approached him for decision of the application but every time he was told that they are seeking legal opinion from their legal advisor on the subject. However, the respondent/ contemnor is not obeying the order of this Hon'ble Court and using delaying tactics to frustrate the orders of this Hon'ble Court.
- 5. That the conduct of the respondent/ contemnor is on the face of it contemptuous and it appears that he has no intention to implement/ obey the orders of this Hon'ble Court.
- 6. That the conduct of the respondent/ contemnor attracts the provisions of law and constitution dealing with punishment of individuals who disobey the orders of this Hon'ble Court or otherwise indulge in a conduct which is punishable under the law of contempt of court.

It is, therefore, respectfully prayed that the respondent/ contemnor namely Dr. Siraj Secretary


ATTESTED  
EXAMINED  
Peabawor High Court



56

3

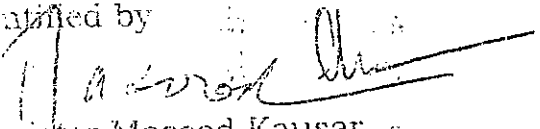
Medical Faculty province of Khyber Pakhtunkhwa Peshawar may be proceeded against under the law of contempt of court and be punished accordingly.

Applicant/ petitioner  
Through   
Barrister Masood Kausar  
Advocate,  
Supreme Court of Pakistan

Dated: 09.07.2010

**AFFIDAVIT**

I, Qamar Abbas S/O Aashiq Ali Permanent resident of Village Topaki, Tehsil and P.O Sadda Kurram Agency, presently residing at House No.790-E, Street No.34, Sector D-4, Phase-1, Hayatabad, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed or kept secret from this Hon'ble Court.

Identified by   
Barrister Masood Kausar  
Advocate Supreme Court of Pakistan.

  
DEPONENT

2130211205517

*[Faint handwritten notes and signatures]*

ATTESTED  
EXAMINER  
Peshawar High Court

Judgment Sheet

IN THE PESHAWAR HIGH COURT,  
PESHAWAR  
(Judicial Department)

COC No.181/2010 in WP No.2377/2010.

JUDGMENT

Date of hearing. 11.4.2012.

Petitioner (Hassan Abbas) By *Mr. Mazullah Barkomeli Advocate*  
Respondents. By *Mr. Azhar Yousof Advocate & \*\*\*\*\*  
Mr. Iqbal Razaq A.A.G.*

DOST MUHAMMAD KHAN, C.J.- In view of the directions issued to the respondents contained in our detailed judgment of even date in WP No.3969/2010, this contempt petition stands disposed of and the notice of contempt issued to the respondents is hereby discharged.

*Sd/- Dost Muhammad Khan C.J.*

Announced:  
11.4.2012

*Sd/- Mian Faridul Malik Judge*

CERTIFIED TO BE TRUE COPY

*SF*  
Examiner 11/6/12  
Peshawar High Court Peshawar  
Authorized Under Article 87 of  
Constitution of Pakistan Order 1983

Judgment Sheet

IN THE PESHAWAR HIGH COURT,  
PESHAWAR  
(Judicial Department)

WP No.3969/2010

JUDGMENT

Date of hearing. 11.4.2012.

Petitioner (Hassan Abbas) By Mr. Mazullah Barkhanda Advocate

Respondents. By Mr. Mhaid Razzaq, A.A.G.  
\*\*\*\*\*

DOST MUHAMMAD KHAN, C.J.- This single judgment shall also decide the connected contempt petition No. 181/2010 as the same has arisen out the order of this court which has not been complied with by the respondents within the given period of ten days. The order of the court in the earlier WP No.2377/2010 is dated 22.6.2010.

2. The case of the petitioner is that after acquiring the requisite academic qualification he successfully qualified the course of Medical Technology from Pakistan Institute of Medical Sciences Islamabad, session 2006-2008. These facts are not denied by the

ATTESTED  
EXAMINER  
Peshawar

respondents nor the credentials of the petitioner have been questioned in any manner.

3. The Agency Surgeon Kurram, advertised through public notice posts of Lab Technicians, the petitioner, being a candidate, was interviewed on 9.12.2009 and was declared successful subject to the condition that registration certificate with regard to the diploma be produced and then he will assume the charge.

4. The petitioner applied to respondent No.3 for that purpose and also deposited, on his direction, the prescribed fee of Rs.3200/-, however, he was not granted the certificate and that too for no good reason.

5. While deciding the earlier WP No.2377/2010, this court directed the respondents to decide the application of the petitioner within ten (10) days but even then it was not complied with, therefore, the petitioner filed contempt petition No.181/2010 and also filed this constitutional petition.

6. Today, learned counsel for the parties and the parties were heard in person.

Handwritten signature and stamp at the bottom right of the page.

7. The respondents were unable to deny the requisite qualification of the petitioner which he had acquired in due course; however, their only objection was that by the time he obtained the diploma from the relevant institute, it was not registered with the Medical Faculty of KPK.

8. When the respondents were confronted with the provision of Medical and Dental Degrees Ordinance and the Notification No. S.O.III(T)4-16/77, wherein it is stated that all Institutions (Medical Faculties) managed and controlled by the Provincial or Federal Government may grant or issue any such Diplomas to the successful candidates, then, why the registration is denied to the petitioner when he is qualified from an Institute of national repute from PIMS Islamabad sponsored by WHO, they were having no plausible answer to give and ultimately they conceded that in view of the high profile of the Institute, wherefrom the petitioner got the Diploma, cannot be questioned on any legal and factual grounds. Moreover, it was further conceded that the Medical Faculty of PIMS which granted the Diploma is

duly registered; hence, denial of registration certificate to the petitioner by the Medical Faculty of KPK is an act ab initio void, without lawful authority and of no legal effect. The replying respondents are required by law to do what has been prayed for in this writ petitioner, however, it is shocking to note that the replying respondents have, for no good reason, constrained the petitioner, peddling him up for such a long litigation which a deplorable conduct on their part.

9. Accordingly, the replying respondents (Medical Faculty KPK) is directed to issue Registration Certificate to the petitioner within one month positively otherwise, this time if the writ of the court is violated, then, no leniency would be shown to the respondents in the matter of contempt, however, in view of the peculiar facts and circumstances, at present we do not think it appropriate for proceeding against the respondents for contempt of court, giving them last opportunity to comply with the order of the court forthwith and for that reason the notice of contempt issued to them is hereby

ATTESTED

EXAMINER  
Peshawar High Court.

(62)

discharged. The writ petition is allowed in the above

terms. *Sd/ Dest Muhammad Khan*  
25

Announced: *Sd/ Mian Fasihul Malik*  
11.4.2012

*Judge*

\*Qaseem\*

CERTIFIED TO BE TRUE COPY

*SF* 1/6/12  
Magistrate  
Peshawar High Court Peshawar  
Issued Under Article 37 of  
Warrant Order 1934

14339

9/4/12

Date of Presentation .....  
 No of Pages ..... 9.0  
 Copying fee .....  
 Stamp Fee .....  
 Total ..... 18  
 Date of Preparation ..... 1/6/12  
 Date Given For Delivery ..... 1/6/12  
 Date of Delivery of Copy ..... 1/6/12  
 Issued By *V. S. S. S.*

(63)



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address; dhqbtg518@yahoo.com  
Casualty Dept Phone No. 0997-310018 Fax No. 0997-311513

No. 2534-38/100 dated 23/07/2015

*Amme*  
*M*

SHOW CAUSE NOTICE

I, Dr Muhammad Daud Medical Superintendent DHQ Hospital Battagram, as Competent authority under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, do hereby serve you Mr Rashid Khan S/O Ghulam Akbar Khan JCT Surgery BPS-09 attached to DHQ Hospital, Battagram as follows:-

"You have been appointed in violation of the rules/standard criteria of the Government and therefore are guilty of misconduct as provided under Rules-2 Sub: para K (vi) of the E&D Rules 2011"

**I am satisfied that your recruitment is violation of the APT rules and punishable under the E&D Rules as specified in Rule-3 of the said rules.**

- 1- In terms of Rules-5 of Khyber Pakhtunkhwa Govt: servant (Efficiency and Discipline) Rules-2011, I, as Competent Authority dispense with the enquiry as the charge is proved against you beyond any doubt and serve you with a show cause notice under Rule-7 of the ibid Rules.
- 2- As a result thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011:-
  - a. Removal from Service.
- 3- You are therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- 4- If no reply to this notice is received within seven days or, not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in, and in that case an ex-parte action shall be taken against you.

Sd x x x

(Dr. Muhammad Daud)  
Medical Superintendent  
DHQ Hospital Battagram

Copy forwarded to the:-

- 1- Director General Health Services KPK Peshawar with reference to his letter No. 3247/CC/2514/2014 dated 14.11.2014 & letter No 2765/cc/2514/2015 dated 30/06/2015 for information please.
- 2- DHO Battagram for information please.
- 3- Rashid Khan S/O Ghulam Akbar Khan JCT Surgery BPS-09 attached to DHQ Hospital, Battagram for compliance.

Medical Superintendent  
DHQ Hospital Battagram.





(64)  
**OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM**

MS Office Phone No. 0997-311518 Email Address; dhqbtg518@yahoo.com  
Casualty Dept Phone No, 0997-310018 Fax No, 0997-311518


No, 2600-01 / Staff dated 31.07.2015

✓ Director General Health Services,  
Khyber Pakhtunkhwa Peshawar,

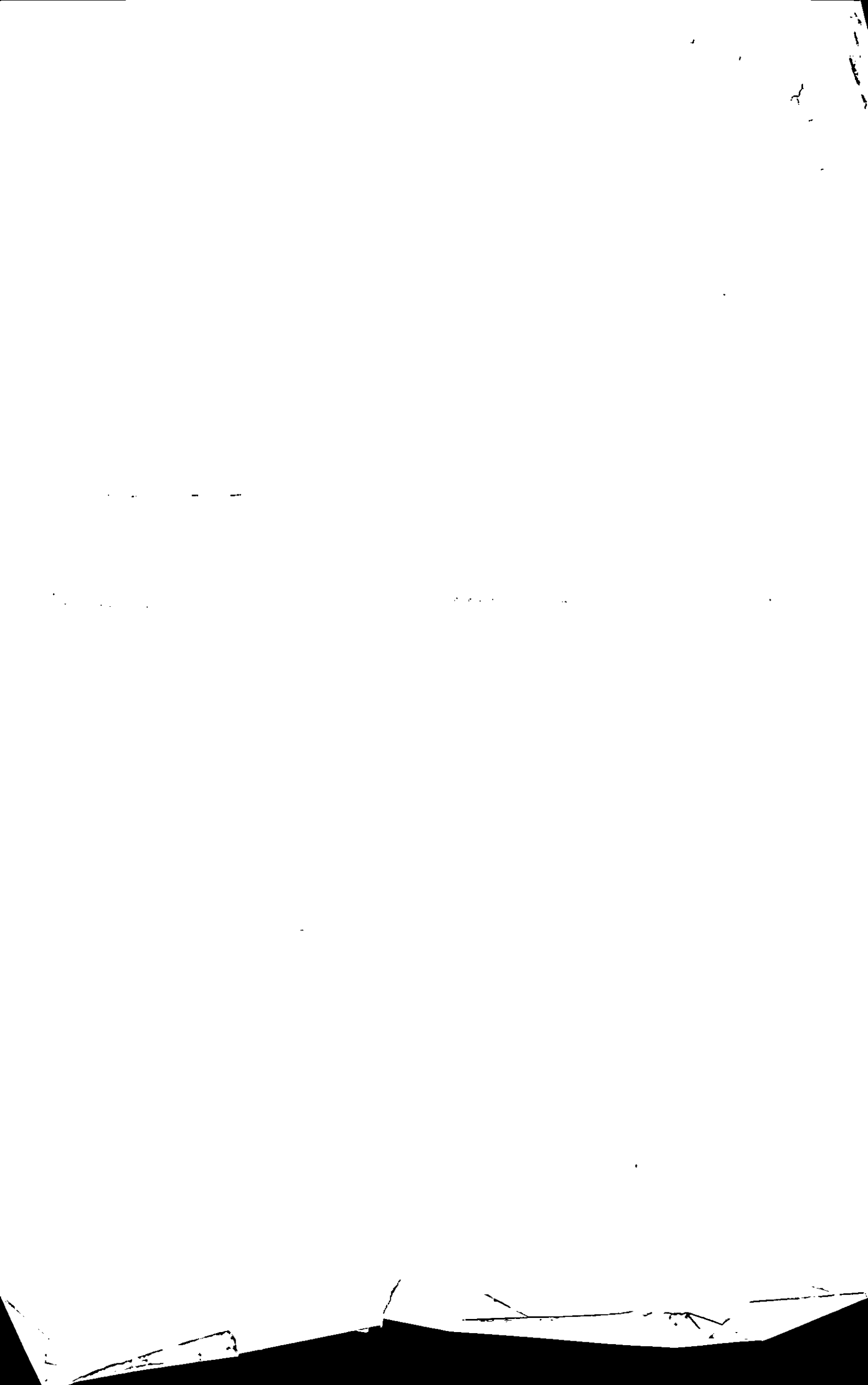
*Ammer*  
*M J*

Subject: DEPARTMENTAL APPEAL.

Enclosed please find herewith an application submitted by Mr. Rashid Khan S/O Ghulam Akbar JCT (Surgical) BPS-09 of this hospital, which is self explanatory for a sympathetic & favorable consideration please.

  
Medical Superintendent  
DHQ Hospital Battagram

Cc to Mr. Rashid Khan S/O Ghulam Akbar JCT (Surgical) BPS-09 for information.



بھصویر جناب قابل احترام ڈائریکٹر جنرل صاحب محکمہ صحت صوبہ خیبر پختونخواہ پشاور

Ammer  
N  
عنوان

اپیل برائے دادری

Dity No  
3028

سائل ذیل عرض گزار ہے

۱۔ یہ کہ سائل بمطابق اشتہار 5 نومبر 2011 روز نامہ مشرق و آج پشاور ضوابط و قواعد کی روشنی میں متعلقہ اتھارٹی نے ہائی کورٹ پشاور کے فیصلہ مورخہ 11/4/2012 کے مطابق JCT سرجیکل پوسٹ پر ڈی ایچ کیو ہسپتال بنگرام میں میرٹ پر بھرتی ہوا تھا۔ جملہ مطلوبہ کوائف ہمراہ لف ہے۔

۲۔ یہ کہ سائل 28 مئی 2012 سے اپنی فرائض سرانجام دیتا چلا آ رہا ہے اس دوران سائل نے ہر لمحہ سرکاری کام کو ذاتی کام پر ترجیح دی ہے بلکہ کسی آفسر کو شکایت کا موقع نہیں دیا ہے۔

۳۔ یہ کہ سائل کے خلاف متعلقہ اتھارٹی نے انکوائری عمل میں لائی ہے جو کہ کلرکوں کی غلطی کی وجہ سے سائل کے خلاف ہوئی ہے حالانکہ سائل اس حوالے سے بالکل بے گناہ ہے کیونکہ جملہ تصدیق شدہ اسناد وغیرہ میں کوئی زرہ بر غلطی نہیں ہے (۱) متعلقہ اشتہار 5/Nov/2011 روز نامہ مشرق اور آج پشاور سلسلہ نمبر ۲ میں JCT سرجیکل پوسٹ درج ہے۔ (۲) اسی طرح میڈیکل فیکٹی پشاور رجسٹریشن سرٹیفکیٹ پشاور ہائی کورٹ کے فیصلہ پر سائل کو ملا ہے جو باقاعدہ طور پر متعلقہ اتھارٹی ڈی ایچ او بنگرام نے verify کر دی ہے جبکہ بمطابق لیٹر نمبر 63-1762 تاریخ 17/06/2015 ڈی ایچ او بنگرام نے سائل کو درست قرار دیا ہے۔ متعلقہ کوائف ہمراہ لف ہے۔

۴۔ یہ کہ سائل شریف اور معزز خاندان سے تعلق رکھتا ہے سائل نہایت غریب ہے ملازمت زر لیوہ معاش کا واحد ذریعہ ہے سائل کی تنخواہ 8 ماہ سے بند ہے دیگر کوئی زر لیوہ معاش نہیں ہے۔ لہذا ملتجیانہ استدعا ہے کہ حالات اور واقعات بالا کے پیش نظر سائل کے حال پر رحم فرما کر ماتحت پروری اور حد اترسی کے بناء پر سائل کو جملہ تنخواہیں عنایت کرنے، جملہ اعتراضات ختم کر کے سر دس جاری رکھنے احکامات صادر فرما کر مشکور فرمائیں۔ سائل تاحیات دعا گو رہے گا۔

الحاض

راشد خان ولد غلام اکبر JCT سرجیکل (BPS-09) ڈی ایچ کیو ہسپتال بنگرام

66

Annex  
66 O 66

ADA No. 129640

Roll No. 65738

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



**Abbottabad N.W.F.P. - Pakistan**  
**SECONDARY SCHOOL EXAMINATION CERTIFICATE**  
**SESSION ANNUAL 2003**

This is to certify that RASHID KHAN  
Son/Daughter of GHULAM AKBER KHAN  
A candidate from GOVT. HIGH SCHOOL TAKRI BANDIGO BATTAGRAM  
has passed the Secondary School Certificate Examination of the Board of  
Intermediate and Secondary Education, Abbottabad held in March 2003 as a  
Regular/Private Candidate. He/She obtained 494 marks out of 850 and has been  
placed in Grade C Representing GOOD.

The candidate passed in the following subjects.

- |            |            |              |                |
|------------|------------|--------------|----------------|
| 1. ENGLISH | 2. URDU    | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS   | 6. PHYSICS | 7. CHEMISTRY | 8. BIOLOGY     |

Date of Birth according to admission form is SECOND FEBRUARY  
One Thousand Nine Hundred and EIGHTY-SEVEN ( 02-02-1987 )

*[Signature]*  
Asstt. Secretary

*[Signature]*  
Attested

This certificate is issued without alteration or erasure.

*[Signature]*  
Secretary

67

Sr. No. 118968

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(Class X)



Session 2003 (Annual)  
Group (SCIENCE GROUP)

Name: Rashid Khan

Father's Name: Chulam Akber Khan

Roll No. 65738

Subjects	Marks	MARKS OBTAINED			
		Theory	Practical	Total	In Words
1. English	150	38	45	83	Eighty-Three
2. Urdu	150	37	48	85	Eighty-Five
3. Islamiyat	75	52		52	Fifty-Two
4. Pakistan Study	75	32		32	Thirty-Two
5. New Rizai	100	60		60	Sixty Only
6. Physics	100	56	14	70	Seventy Only
7. Chemistry	100	36	15	51	Fifty-One
8. Biology	100	46	15	61	Sixty-One

Total 850

494-C	Four Hundred Ninety-Four Only
Remarks	

Checked By: [Signature]

Date: 25-06-2003

Note: Errors / Omissions are excepted

Khaksar and BRAKIS Software Enterprise (KBSoft)

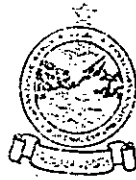
[Signature]

Controller of Examinations  
BISE Abbottabad

Attested

[Signature]  
Medical Officer  
B.N.Q. Hospital  
Hattagram

Certificate No: 206060537



68

Roll No: 60537

Group: PRE-ENGG

**DETAILED MARKS CERTIFICATE**  
**HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION**  
**Part - II**

Session: 2006 (Annual)

Name: RASHID KHAN

Father Name: GHULAM AKBER KHAN

Institution/  
District: BATTAGRAM



has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May / June as a Private Candidate

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract.	Theory	Pract.		
English	200	35	--	34	--	69	Sixty-Nine
Urdu (Comp)	200	47	--	50	--	97	Ninety-Seven
Islamic Education	50	30	--	--	--	30	Thirty Only
Pakistan Studies	50	--	--	24	--	24	Twenty-Four
Mathematics	200	36	--	42	--	78	Seventy-Eight
Physics	200	31	21	36	15	103	One Hundred Three
Chemistry	200	27	16	31	10	84	Eighty-Four

Total: 1100

485-D Four Hundred Eighty-Five Only

Remarks:

Date: 05-August, 2006

Checked By:

Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: [www.bisoad.edu.pk](http://www.bisoad.edu.pk)

Attested

Medical Officer  
D.H.O. Hospital  
Battagram

69



# HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 22231

## DETAILED MARKS CERTIFICATE

### BA ANNUAL EXAMINATION 2009

Roll No: 52238

Reg No: 0180BCMPX-BA

Name: Rashid Khan

F/ Name: Ghulam Akbar Khan

Institution/  
District: BATTAGRAM

Part: Second

COURSE TITLE:	Max. Marks		Marks Obt.		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks	285				111	ONE HUNDRED ELEVEN	
ENGLISH	75		25		25	TWENTY-FIVE	Pass
PAKISTAN STUDIES	40		14		14	FOURTEEN	Pass
ISLAMIC STUDIES	75		47		47	FORTY-SEVEN	Pass
POLITICAL SCIENCE	75		25		25	TWENTY-FIVE	Pass
Total:	550				222	TWO HUNDRED TWENTY-TWO	

Total: 550

Percentage: 40.36

Division: THIRD



Print Date: 31-08-2009

Checked By: [Signature]

[Signature]

Controller Examinations  
Hazara University, Mansehra  
August 29, 2009

Errors and omissions are subject to subsequent rectification.  
Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Attested  
[Signature]  
Medical Officer  
D.H.O. Hospital  
Battagram

70



# HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

SNo: 2819

## DETAILED MARKS CERTIFICATE

### MASTER OF ARTS (FINAL) ANNUAL EXAMINATION 2011

Roll No: 40384

Reg No: 0180BGMPX-BA7

Name: Rashid Khan

F/Name: Ghulam Akbar Khan

Institution/ District: MANSEHRA

Subject: Islamiyat

COURSE TITLE:	Max. Marks		Marks Obt.		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA-Previous Marks	500				299	TWO HUNDRED NINETY-NINE	
(Al-Qura'an) Translation 2nd Half & Commentary along with Grammar	100		50		69	SIXTY-NINE	Pass
Principles of Islamic Jurisprudence	100		66		66	SIXTY-SIX	Pass
Islam & other World Religions	100		62		62	SIXTY-TWO	Pass
Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100		73		73	SEVENTY-THREE	Pass
Islamic Economics / Islamic Politics / Islam & Science	100		70		70	SEVENTY	Pass
General Viva Voce	100		55		55	FIFTY-FIVE	Pass
Total: 1100					694	SIX HUNDRED NINETY-FOUR	
Percentage: 63.09							
Division: FIRST							

Print Date: 16-01-2012

Checked By:

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations  
Hazara University, Mansehra  
January 16, 2012

Attested

Medical Officer  
D.H.Q. Hospital  
Mansehra



(71)

# DOMICILE CERTIFICATE



I declare that I was born of parents who are permanently domiciled in N.W.F.P having belonged to it by birth/settled in it.

I belonged by birth to Village/Mohalla THAYA

Tehsil BATTAGRAM

District BATTAGRAM

*Rashid Khan*

Signature of the applicant

Dated 07-07-2003

Pursuance to the declaration dated \_\_\_\_\_

filed by RASHID KHAN Son/Daughter of GHULAM AKBER KHAN

domiciled in the N.W.F.P., it is hereby certified that the said

RASHID KHAN is born of parents who are permanent residents of the N.W.F.P., having belonged to it by birth/settled in.

I have satisfied myself from personal/my knowledge verification that the above declaration is true and certify.

This \_\_\_\_\_ day of \_\_\_\_\_

DEPUTY DISTRICT OFFICER.  
REVENUE AND ESTATE.  
BATAGRAM/ALLAI

NO. 3490

DATED 8-7-2003

COUNTERSIGNED

*Man*  
DISTRICT OFFICER.  
REVENUE AND ESTATE.  
BATAGRAM

*Man*  
District Officer  
Revenue & Estate  
Battagram.

*Attested*

لقد تم بحال كما في نسخة من راجه خان ولاه كبر خان  
ساكن قبا جبره كبره ولاه كبره ساكن قبا جبره كبره



لقد تم بحال كما في نسخة من راجه خان ولاه كبر خان  
تقوم ساكن قبا جبره كبره ساكن قبا جبره كبره  
والا جبره كبره ساكن قبا جبره كبره

حضرت يونس  
Hazrat Younas Khan  
General Counselor  
Union Council Hanay

جناب عالی  
حسب لخدمتہ میں ہونے والے خزانہ و خیرت اور خزانہ ہر دو جنرل کونسلرز  
پولیس و نل جانچال کے معائنہ اور اچھل جانے والے خزانہ رقم حوالہ  
سائنس تیار جدید اور خزانہ کے کھنڈے ہونے پر ہر دو اجراء سے پیدا ہونے والے  
و نئے لاشقات مال ہونے کے لئے ہر دو اجراء سے ہر دو اجراء سے ہر دو اجراء سے

۸/۷/۵۳

Handwritten signature and date 8/7/53

ATTESTED  
Tehsil Hanay

Handwritten numbers and text at the bottom of the page.

73

# College of Medical Technology

Pakistan Institute of Medical Sciences, G-8/3,  
Islamabad. Ph: 051-9261191



Date 2/3/11

NATIOAL VOCATIONAL & TECHNICAL EDUCATION COMMISSION (NAVTEC)  
Prime Minister's Program of Hunarmand Pakistan

## RESULT INTITMIATION CERTIFICATE

Name: Rashid Khan  
Father's Name: Ghulam Akbar Khan  
Roll Number: 37 Exam held in: January - February, 2011  
Discipline: EMERGENCY MEDICAL ASSISTANT Session: 2010 - 2011

S. No.	Subject	Total Marks	Marks Obtained	Remarks
1	English & Communication Skills	100	66	Pass
2	Computer & Patient Safety	125	55	Pass
3	Anatomy & Physiology	150	92	Pass
4	Pathology Bio. & Pharmacology	100	75	Pass
5	First Aid & Public Health	75	58	Pass
6	Technique	200	158	Pass
- -	Total Marks	750	504	67.2%

M. Javed Iqbal  
Prepared By:

*[Signature]*  
Assistant Registrar  
(Schools)

R. Saleem  
Checked By

Date of Issued: 2/3/11

*[Signature]*  
M. Javed Iqbal

SHER AFZAL AWAN  
Registrar & Controller of  
Examination  
C.M.T., PIMS, Islamabad

C.M.T. Islamabad

SHER AFZAL AWAN  
TRAINING COORDINATOR  
NAVTEC-CMT

(74)



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ  
ISLAMABAD HOSPITAL  
PAKISTAN INSTITUTE OF MEDICAL SCIENCES  
G-3/3 ISLAMABAD

Your Ref. No. Amesthesia-2011

Date 02/03 2011

Our Ref. No. \_\_\_\_\_

TO WHOM IT MAY CONCERN

It is certified that Mr. Rashid Khan S/o Ghulam Akber Khan under NIC No. 13202-3671305-1 has worked in Surgical Intensive Care Unit, Pakistan Institute of Medical Sciences, Islamabad as Emergency Medical Assistant (E.M.A) w.e.f. 8<sup>th</sup> December, 2010 to 10<sup>th</sup> January, 2011.

He was a student of College of Medical Technology, affiliated with PIMS. He was rotated to SICU as a part the module of the course. During his stay he gained good experience of administering. Injections, I.V Lines, Changing dressings, stitching etc. I found him respectful to his senior colleagues and be comforted forward the Patients.

I recommended him for any job that suits his experience.

DR. KH. KAMAL NASIR  
Professor  
Dept. Of Anaesthesiology & Intensive Care  
Quaid-e-Azam Hospital, Islamabad Medical College  
Pakistan Institute of Medical Sciences  
Islamabad

(Dr. Kamal Nasir)  
Prof. Anaesthesia  
S.I.C.U, PIMS  
Islamabad.

75

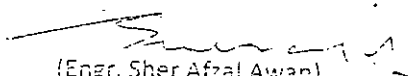
No. 1. 5-3/2012-CMT/PIMS  
College of Medical Technology  
Pakistan Institute of Medical Sciences, Islamabad.

Dated 19th May, 2012.

TO WHOM IT MAY CONCERN

Mr. Rashid Khan S/O Ghulam Akbar has completed the course in "Emergency Medical Technician" in this College under National Educational and Vocational Training Commission, Islamabad.

He can work as O. T. assistant as his whole Job training was in O.T. of Emergency and Accident Department of PIMS.

  
(Engr. Sher Afzal Awan)  
Registrar, CMT.

**SHER AFZAL AWAN**  
Registrar & Controller of  
Examination  
C.M.T. P.I.M.S. Islamabad

(76)

No. 1279 / dated Battagram the 12 /06/2012.

From: The Medical Superintendent, D.H.Q. Hospital Battagram.

To: The Registrar/Controller, Of Examination College of Medical Technology, PIMS Islamabad.

Subject- VERIFICATION OF DIPLOMA

Enclosed please find herewith a Secondary School Examination Certificate in respect of Mr. Rashid Khan S/O Ghulam Akbar Khan ~~Aslam~~ newly appointed for verification in the term in condition of his appointment.

Medical Superintendent, D.H.Q. Hospital Battagram.

(77)

No. F. 5-20/NAVTEC/CMT(Admin)/2011/PIMS  
COLLEGE OF MEDICAL TECHNOLOGY  
Pakistan Institute of Medical Sciences,  
Islamabad

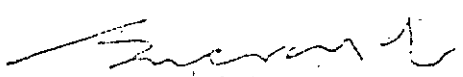
Dated: 16<sup>th</sup> June, 2012

The Medical Superintendent,  
District Head Quarters Hospital,  
Battagram.

Subject: VERIFICATION OF DIPLOMA

Reference to your letter No. 1279 dated 12<sup>th</sup> June, 2012.

It is verified that the Photo Copy of the Diploma as Emergency Medical Technician Session – 2010 – 2011 in respect of Mr. Rashid Khan S/o Ghulam Akbar Khan is copy of the original as per record.

  
Engr. Sher Afzal Awan,  
Registrar, C&E

ADA No. 129640

Roll No. 65738

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan  
SECONDARY SCHOOL EXAMINATION CERTIFICATE  
SESSION ANNUAL 2003

This is to certify that RASHID KHAN  
Son/Daughter of GHULAM AKEER KHAN

A candidate from GOVT. HIGH SCHOOL TAKRI BANDIGO BATTAGRAM  
has passed the Secondary School Certificate Examination of the Board of  
Intermediate and Secondary Education, Abbottabad held in March 2003 as a  
Regular/Private Candidate. He/She obtained 494 marks out of 850 and has been  
placed in Grade C1 Representing GOOD.

The candidate passed in the following subjects.

- |            |            |              |                |
|------------|------------|--------------|----------------|
| 1. ENGLISH | 2. URDU    | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS   | 6. PHYSICS | 7. CHEMISTRY | 8. BIOLOGY     |

Date of Birth according to admission form is SECOND FEBRUARY  
One Thousand Nine Hundred and EIGHTY-SEVEN ( 02-02-1987 )

*[Signature]*  
Asstt. Secretary

Assistant Secretary (Certificates)  
1988 Abbottabad  
This certificate is issued without alteration or erasure.

*[Signature]*  
Secretary



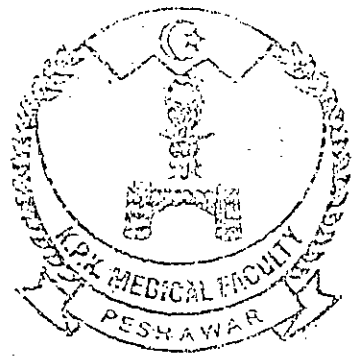
79

Serial No 3499

Roll No 37/PIMS/Islamabad

Examination Session 2/2011

**KHYBER PAKHTUNKHWA MEDICAL FACULTY**  
**PESHAWAR, PAKISTAN**



**Renewal of Certificate**  
**REGISTRATION / ENROLMENT**  
**VALID FOR FIVE YEARS**

The Registration No. MP/675/O.T.A/PIMS/Islamabad/37/2/2011

Enrolment / Provisional Certificate bearing Roll No. 37 /PIMS Islamabad

Session 2/2011 of Mr/Miss/Mrs Rashid Khan

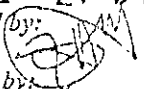
Son / Daughter of Ghulam Akbar Khan as Operation Theatre Asstt. is hereby


renewed from 1/2015 to 1/2020

MP/123/MP/ Dated 21-01-2015


P.5-20/2015/CME/PIMS

Dated 24-01-2015

Prepared by: 

Checked by: 

Verified by: Muhammad

  
**SECRETARY**  
 Khyber Pakhtunkhwa  
 Medical Faculty Peshawar

14/1/2015  
14/1/2015  
 Khyber Pakhtunkhwa  
 Medical Faculty Peshawar

80

OFFICE OF THE DISTRICT HEALTH OFFICER  
Battagram (Khyber Pakhtunkhwa)

NO. 883-84 / DATED 4.3 /2015.

To  
The Secretary  
Medical Faculty  
Khyber Pakhtunkhwa Peshawar.

Subject: - VERIFICATION OF DIPLOM/CERTIFICATES  
Sir,

In the light of enquiry conducted by DGHS vide letter No.3247/CC/2514/2014 Dated 14/01/2014, this office required verification of the following officials appointed in this office.

You are requested to verify either these certificates/Diplomas are issued from Medical Facility Peshawar or not. Your early response in this regards will be anticipated to probe the matter in the interest of public

S.N	DEGREE	ROLL NO	NAME	FATHER NAME	SESSION
1.	Certificate (Anesthesia Assistant )	3077	Yousaf Ali	Fateh Khan	07/1999
2.	Certificate as(OT Assistant )	5002	Ihsanullah	Fazal Rahim	11/2007
3.	Diploma (Anesthesia Technology)	65180	Mujeeb ur Rehman	Shah Room Khan	2009/2010
4.	Diploma (ophthalmology technology)	1168/K PK/MF	Tanzeel ur Rehman	Inayatullah	2002-2004/15
5.	Certificate (OT Assistant)	37/PIM S/islam Abad	Rashid Khan	Ghulam Akbar Khan	2/2011
6.	Diploma (anesthesia technology)	72123	Muhammad Rafiqullah	Muhammad Aslam Khan	2009/2010

District Health Officer  
Battagram

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar w/r to his letter referred above for information.

*[Handwritten Signature]*

10 | 11 | 12 | 13 | 14 | 15

(81)

**KHYBER PAKHTUNKHWA MEDICAL FACULTY  
PESHAWAR**

No. 1245 /MF  
Dated: 26-3-2015

To:

The District Health Officer,  
Battagram.

Subject: VERIFICATION

Memo:

Reference your letter No. 883-84 dated 04.03.2015 on the subject noted above.

The particulars of the following Diploma/Certificate have been checked with the official record and the remarks are as under.

S.No	Name	Father Name	Category	Roll No	Session	Remarks
01	Yousaf Ali	Fateh Khan	Anaesthesia Assistant	3077	07/1999	VERIFIED
02	Ihsan Ullah	Fazal Rahim	O.T Assistant	5002	11/2007	VERIFIED
03	Majeed Ur Rehman	Shah Room Khan	Anaesthesia Technology	65180	02/2011	PROVIDE DMC
04	Tanzeel Ur Rehman	Inayat Ullah	Ophthalmology Technology	1163/MF/PIMS Islamabad	2002/2004	VERIFIED
05	Rashid Khan	Ghulam Akbar Khan	O.T Assistant	37/PIMS Islamabad	02/2011	VERIFIED
06	Muhammad Rafiq Ullah	Muhammad Aslam Khan	Anaesthesia Technology	72123	02/2011	VERIFIED

SECRETARY  
KHYBER PAKHTUNKHWA  
MEDICAL FACULTY PESHAWAR

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH BATTAGRAM.  
MERIT LIST OF CONDIDATES FOR THE POST OF JCT SURGERY.

No	Name	Father Name	Domicile	A. Qualificatin	P. Qualificatin	D.O.Birth	Matric			F.A	B.A	M.A	Experie nce	Interview	Total	Remarks
							1st Div:	2nd Div:	3rd Div							
1	Asad Ullah	Azmat Ullah	Mansehra	F.A	O.T Assistant from Army Medical Corps	01.05.1972	0	38	0	6	0	0	10	0	54	Approved Retired from Army Medical Corp
2	Ihsan Ullah ✓	Fazal Raheem ✓	Battagram ✓	Matric	O.T Technician from Govt PMH, Swat Medical Faculty Peshawar	15.03.1974	0	38	0	0	0	0	✓	✓	42.5	(Overage) Age Relaxation case may be proceed
3	Shahid Mehmood	Syed Yaqoob Shah	Battagram	F.A	14 Months from PVCT	20.06.1987	0	38	0	6	0	0	4.5	4	48	Not Registered with Medical Faculty Peshawar
4	Irshad Hussain Khan	Shah Zaman Khan	Timergra	F.A	O.T Tech from MF Sind		0	38	0	6	0	0		2	45	Not Registered with Medical Faculty Peshawar
5	Sulernan	Rasool Khan	Battagram	Matric	Clinical Technicián MPC, Nowshera SDC	05.04.1992	0	38	0	0	0	0	3.2		43.2	Diploma from Skill Development Council
6	Adeei Ahmad	Muhammad Rafique	Abbotabad	Matric	O.T Technician from FIMS, Abbotabad SDC Islamabad	21.06.1992	0	38	0	0	0	0				
7	Rashid Khan	Ghulam Akber Khan	Battagram	M.A	1 Year Diploma (EMA) from CMT PIMS Islamabad	02.02.1937	0	38	0	0	0	12	2.4		40.4	Diploma from Skill Development Council
													3		53	Having No related diploma in Surgery

Member  
Representative of DCO

Member  
Representative of DGHS

Member  
Medical Superintendent

Chairman  
Executive District Officer, Health

# وکالت نامہ

بعدالت جناب سر محمد رفیق رحمانی

منجانب ایس ایف

نام حکومت خیبر پختونخوا

دعویٰ یا جرم ایف

باعث تحریر آنکہ!

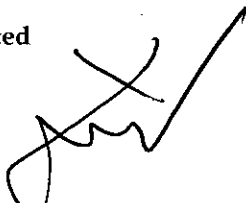
اندریں مقدمہ عنوان بالا اپنی طرف سے برائے پیروی و جواب وہی بمقام سر محمد رفیق رحمانی

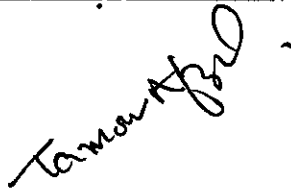
**خان افضل، ایڈووکیٹ سپریم کورٹ آف پاکستان** کو بدیں شرف

دکیل مقرر کیا ہے کہ میں ہر پیشی خود یا بذریعہ مختیار حاس زویر و عدالت حاضر ہوتا ہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پچھری کے علاوہ کسی اور جگہ سماعت ہو یا پچھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد دہاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفہ درخواست حکم امتناعی یا فیصلہ قبل ازین ڈگری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادا ہوگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا پیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پر داختم موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند آر ہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Attested & 200..... مورخہ

accepted





Khan Afzal,  
Advocate Supreme Court of Pakistan, Mansehra

مانسہرہ ٹوائسٹ ایڈووکیٹس اینڈ کپیرٹرز گزٹڈ پوائنٹ ڈسٹرکٹ کورٹس آنسہرہ

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

**PESHAWAR CAMP COURT ABBOTTABAD.**

**Appeal NO. 49/ 2016**

Rashid Khan -----

**Appellant**

**VERSUS**

1. Govt: of KPK and others

**COMMENTS ON BEHALF OF RESPONDENTS**

**Respectfully Sheweth:-**

**Preliminary Objections:-**

1. That the appellant did not come to this Service Tribunal with clean hands.
2. That the appellant has no cause of action/ locus standi to file the instant appeal.
3. That the instant appeal is hit by laches and barred by law of limitation.
4. That the appeal has been filed to pressurize the respondents.
5. That the appellant was proceeded against as per rules and show cause notice was issued to appellant which was not replied where after the final order was issued. Hence the instant appeal is liable to be dismissed.
6. That any other ground and case law will be presented at the time of humble submissions at the bar.

## FACTUAL OBJECTIONS:-

1. Correct.
2. Correct.
3. Correct.
4. Correct.
5. Incorrect as stated. The selection committee only checked the documents of the appellant. Tentatively there was no mechanism for the verification of the documents at the time of interviews. Documents of the selected candidates only are got verified from the institution who had awarded the certificate.
6. Incorrect as stated. The departmental selection committee recommended the appointments subject to the verification of the documents.
7. Incorrect as stated. The appellant was recommended for appointment subject to fulfilling all the legal and codal formalities including verification of the documents submitted by him.
8. Incorrect as stated. It was the recommendation of the enquiry committee who after completing the enquiry found that the appointment of the appellant was violation of ATP rules as approved under rule 2 para K(VI).
9. Incorrect as stated. Office order No.128-33 dated 23/1/2015 was withdrawn by the same office vide his office order No.179-85 dated 29/1/2015. For this act he was neither justified nor authorized as the letter No.128-33 dated was issued in compliance with the order of higher office where as its withdrawal was having no such legal force.

10. Incorrect as stated. In fact respondent No.4 issued his letter No.1039-40 dated 17/3/2015 requesting respondent No.3 for avoiding duties and attendance of the appellant. This letter was issued in compliance of the order of higher office Director General Health Services Khyber Pakhtunkhwa Peshawar vide his letter No.3239/CC/2514/2014 dated 14/11/2014. Later on when the persons at S.No.1 to 4 produced their documents to his office he withdrew the previous letter of his office and in the same Letter while showing his leniency, he allowed the officials at S.No.5 and 6 to continue their services till further orders.

11. Incorrect and hence denied. The said letter No.179-85 dated 29/1/2015 of the office of the District Health Officer is related to withdrawal of letter No.128-33 dated 23/1/2015 of the same Office. The later office order contains initiation of disciplinary action against so many illegal appointment including that of the appellants, in compliance with the orders of an office having higher hierarchy. In office of lower hierarchy is not capable of superceding the orders of the office of higher hierarchy.

12. Correct. It is done as per the prevailing rules against appointment on basis of fake documents.

13. Subject to proof.



## GROUND.


- I) Incorrect and denied. The impugned order is absolutely in accordance with the prevailing service law and rules.
- II) Incorrect and denied. Respondent no.3 has very clearly given the reason of removal of the appellant that the appointment of the appellant was in violation of the rules/standard criteria of the Government.
- III) Incorrect and denied. The appellant was appointed subject to verification/validation of his certificates/diplomas.
- IV) Incorrect. The diploma produced by the appellant at the time of appointment was not registered with Khyber Pakhtunkhwa Medical Faculty Peshawar, which was got registered after the proceedings of enquiry and issuance of the recommendations regarding removal of the appellant.
- V) Incorrect. At the time of enquiry the appellant was given full opportunity to produce valid diploma registered with Khyber Pakhtunkhwa Medical Faculty Peshawar. But the appellant failed to do so.
- VI) Correct. The enquiry committee recommended the removal from services of the appellant. Hence the salary of the appellant was stopped till the final decision.
- VII) Incorrect. Registration certificate was issued by the Khyber Pakhtunkhwa Medical Faculty Peshawar after the proceeding of enquiry against the fake appointments and issuance of the

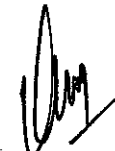
recommendation for the removal from services about the appellant.

- VIII) Incorrect. The allegation upon which the removal from services order was issued was against the ATP rules 2011 sub rules 2K (VI).
- IX) Incorrect as stated. The appellant was removed from the services on the recommendations of the inquiry committee.
- X) Incorrect. At the time of appointment the appellant did not produce a valid diploma. Hence the appellant was illegal ab-initio.
- XI) Incorrect. The show cause notice was issue vide letter No.2534-36 dated 23/7/2015 of the office of the respondent No.3. The appellant never presented himself for personal hearing.

In the light of above stated facts it is very humbly prayed that the appeal in hand as being against the law/Rules and policy of the Government of Khyber Pakhtunkhwa, be dismissed with cost throughout.

  
Secretary Health  
Government of Khyber Pakhtunkhwa  
Peshawar. Respondent No. 1

  
Medical Superintendent  
DHQ Hospital Battagram  
Respondent No. 3

  
Director General Health Services  
Khyber Pakhtunkhwa Peshawar  
Respondent No. 2

  
District Health Officer  
Battagram Respondent No. 4

**BEFORE THE HONORABLE COURT KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR AT CAMP COURT ABBOTTABAD**

SUBJECT: - WRIT PETITION NO.49/2016

Rashid Khan

Appellant

**VERSUS.**

Government of Khyber Pakhtunkhwa

Respondent.

**AFFIDAVIT.**

I Dr. Mohammad Daud Medical Superintendent DHQ Hospital Battagram do hereby affirm and declare that the comments of para wise writ petition are true and correct as per my knowledge and available record that nothing material has been suppressed this honorable court.



RESPONDANT NO. 3



DIRECTORATE GENERAL HEALTH SERVICES,  
KHYBERR PAKHTUNKHWA, PESHAWAR

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.  
Exchange # 091-9210187, Tele # 9210196 Fax # 091-9210230

No. 3247 /CC/2514/2014

Dated 14 /11/2014

To,

The District Health Officer,  
Battagram.

Subject: ENQUIRY OF IRREGULAR APPOINTMENTS.

In continuation, of this Directorate letter No.2717-20/cc/2511/2014 dated 08/09/2014, I am directed to forward an enquiry report conducted by Dr.Niaz Muhammad SMO Civil Hospital Battal Mansehra and Mr. Muhammad Jamil Assistant Director(P-II) DGHS Office KPK Peshawar for implementation and necessary action with the following remarks.

- I. After going through the enquiry report it is observed that the said recruitment has been made against the Esta Code of the Govt, almost against the merit and rules regulation of the Govt have been violated.
- II. All those recruited against the merit may be terminated w.e.f the date of recruitment, salaries made so far be recovered from the wrong selectees/ those officers/ officials who are responsible for this illegal appointments immediately.
- III. Disciplinary action may be initiated against the culprits (Responsible for this illegal appointment).
- IV. Fresh procedure as per Esta Code recruitment policy may be initiated for new recruitments.

Mr. Mohammad Hassan &  
Shah Raisul & B. Inhibi documents  
Class III employees only

DIRECTOR GENERAL HEALTH  
SERVICES, KHYBER PAKHTUNKHWA,  
PESHAWAR.

Stop the pay  
of Class III  
MK And  
DHO 14/11/15

13/11/14



**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

*All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.*  
Office Ph ( 091 - 9210269 Exchange S 091 - 9210187, 091 - 9210196 Fax P 091 - 9210230

No 2717-20 /CC/2511/2014

Dated 8 /09/2014

**MOST IMMEDIATE**

To,

1. Dr. Niaz Muhammad SMO,  
Civil Hospital Battal District Manshera.
2. Mr. Muhammad Jamil  
Assistant Director(P-II), DGHS Office Peshawar.

**SUBJECT: OFFICE ORDER.**

I am directed to refer of this DGHS office Order bearing endorsement No.647-53/CC/2511/2014 dated 14-04-2014 on the subject noted above with the remarks to proceed to Battagram for examination /Scrutiny of the remaining documents of the candidates appointed by DHO Battagram prior to 01/07/2013.

Director (Admin)  
DIRECTOR GENERAL HEALTH  
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Cc:

Copy forwarded to the:

1. District Health Officer Battagram for information and to make available all the relevant record to the enquiry committee.
2. Medical Superintendent DHQ Hospital Battagram for information and necessary action w/r to DHO Battagram letter No.8756-58 dated 01/09/2014, he is directed to provide the relevant record to DHO Battagram within 03 days without fail.

5/9/14

ENQUIRY REPORT INTO THE ALLEGED IRREGULARITIES IN THE RECRUITMENT  
PROCESS OF PARAMEDICS/OTHER CLASS-III STAFF AND CLASS-IV EMPLOYEES IN  
THE OFFICE OF THE DISTRICT HEALTH OFFICER BATTAGARAM.

BACK GROUND.

Vide Director General Health Services Khyber Pakhtunkhwa office order bearing endorsement No.647-53/complaint cell-2514 dated 14/4/2014 an inquiry committee comprising Dr.Niaz Muhammad SMO CH Battal and Mr. Muhammad Jamil Assistant Director (Personnel-II) Directorate General Health Services Khyber Pakhtunkhwa Peshawar has been constituted to probe the alleged irregularities in the recruitment process of the employees in Department of Health District Battagram (F/A)

PROCEEDINGS

The Committee proceeded to Battagram on 23/04/2014 and remained there upto 26/4/2014. The Committee scrutinized the relevant record pertaining to recruitments made by Dr. Aqeel Bangash and Dr. Shehzad Ali Khan Ex-DHOs Battagram for the periods with effect from 1/7/2013 till their tenures.

This is worthwhile to mention that merit lists and documents pertaining to the recruitment issued by Dr.Aqeel Bangash Ex-DHO Battagram prior to 1-7-2013 were not produced by the DHO Office Battagram; saying that the same were taken away by the Ex-DHO Dr.Aqeel Bangash as per their written statements mentioned below. On enquiry from Dr.Aqeel Bangash, although he produced photo copies of the merit lists at F/B but showed ignorance about the documents.

While forwarding the previous Enquiry Report, the District Health Officer Battagram was asked vide DGHS letter No.1206-09/Complaint Cell/2511/2014 dated 29<sup>th</sup> May 2014 for producing the remaining documents pertaining to recruitments of Class-III and Class-IV employees made by Dr.Aqeel Bangash the then DHO for the period prior to 1-7-2013 within fifteen days. But after protracted correspondence with the District Health Officer Battagram, he

has been able to produce the documents ibid that is too in piecemeal upto 10<sup>th</sup> October 2014.

### FINDINGS.

The Committee after scrutiny found various irregularities in the recruitment process which are mentioned below:-

- Format of the merit list is not according to the standard criteria of the Government.
- As required under the relevant criteria of the Government at Flag-C, Diploma marks not included in the merit list after the marks of prescribed qualification i.e. matric. More so the marks allotted for the prescribed qualification were not according to standard criteria, e.g. certain candidates with 2<sup>nd</sup> division were allotted the marks of first division and vice versa. In certain cases marks for higher qualification have been given to the candidates although no documentary proof was produced in this regard to the Enquiry Committee which makes selection/recruitment of some of the candidates doubtful.
- Written test marks included in the merit list in violation of the approved Service Rules.
- In some cases more than 8 marks allotted to the candidates in the column of interview marks, in violation of the criteria fixed by the Government.
- Experience marks are not given as per Government criteria and in some cases experience marks are given on the basis of experience certificates of unregistered private institutions; even in some cases marks given without experience certificate.
- Minutes of the Departmental Selection Committees duly signed by chairman and members of the DSC, are not recorded.
- Candidates in various categories have been recruited by Dr. Aqeel Bangash without valid certificates/diplomas.
- Class-IV employees have been appointed by the Ex-DHO viz: Dr. Aqeel Bangash without inviting applications through employment exchange (not available in District Battagram) or press advertisement.
- Ward Ayas (nomenclature thereof not available in the sanctioned strength of District Battagram) have been appointed by Dr. Aqeel Bangash against the posts of Dais without observance of codal

*unfair merit list*

*Exp*

formalities which is again violation of the rules/regulations and policy of the Government. The Committee noted with concern as to how their salaries have been allowed by the DAO Battagram.

- As a matter of fact the educational qualification/technical diplomas etc of paramedics are required to be verified by the concerned Board of Intermediate and Secondary Education and Khyber Pakhtunkhwa Medical Faculty Peshawar. To the utter surprise of the committee salaries of all paramedics/other employees have been activated without verification from the above institutions.
- In spite of the fact, meeting of the DSC was attended and merit list signed by the Representative of DCO Battagram and representative of the DG Health Services, but none of them were able to pin point the irregularities mentioned above.

*who was this fellow*

CONCLUSION

Dr. Aqeel Bangash ex-District Health Officer District Battagram is responsible for the irregular recruitments and a warning in this regard has already been issued to him.

*only warning - what about the wrong selectees?*

RECOMMENDATIONS

In view of the foregoing the Enquiry Committee recommends action against various categories of employees as mentioned against each below:-

S.No	Nomenclature of the post	Names of employees appointed.	Observation of the Committee	Recommendation
1	Receptionist (merit list at Annex: I)	Ijaz Ali s/o Muhammad Khateeb (Battagram) Merit list at Annexure-I	<p>a) BA marks added in the column of higher qualification but <u>BA degree not produced.</u></p> <p>b) As per matric certificate, the Official has got <u>2<sup>nd</sup> divn:</u> but marks given of <u>1st divn:</u></p> <p>c) Matric certificate not verified from the concerned</p>	If the marks of prescribed/higher qualification irregularly added in the merit list are deleted, another candidate in the merit list would have been eligible for selection.



			Board of Intermediate and Secondary Education but salary started.	Therefore, show cause notice may be served upon Mr.Ijaz for removal from service and his salary stopped.
2	JCT Cardiology (Merit list at Annex:II)	Muhammad Wasim s/o Muhammad Bashir (Battagram) Merit list at Annexure-II	a)Marks for higher qualification allotted two step above while the employee has qualified FA(one step above) b)No certificate/diploma in Cardiology produced from Medical Faculty KPK Pesh:	Beside irregularity at Sl:No.a of the observations, Muhammad Wasim has been appointed without having been qualified from the Medical Faculty; he may be served upon with show cause notice for removal from service and his salary stopped.
3	Malaria Supervisors (Merit list at Annex:III)	i.Sher Ali Khan s/o Ghulam Muhammad (Battagram)	He is matric with science and possess diploma from the Medical Faculty Peshawar.	May be allowed to continue service as Jr.PHC Tech (MP) being qualified but after verification of his matric certificates etc.and diploma from the Medical Faculty Peshawar. Till then his salary must be stopped and if found fake, show cause notice may be served upon him for removal from

*clear documents verified*

⊕

			service.	
Malaria Supervisors (Merit list at Annex:III)	ii. Abdul Manan Shah s/o Syed Amir Nawab Shah (Battagram)	a) No documents produced to the Enquiry Committee. b) He was already serving as Insect Collector but again applied for Malaria Supervisor and subsequently appointed in contravention of the approved S/Rules.	As per revised service structure of Paramedics notified in 2006, the post of insect collector has since been re-nomenclatured as Jr.PHC Tech:(MP), therefore, he may be allowed to continue as Jr.PHC Tech:(MP) and his irregular recruitment order as Malaria Supervisor withdrawn	
Malaria Supervisors (Merit list at Annex:III)	iii. Amjed Khan s/o Babu Khan (Battagram)	Recruited in violation of the Approved S/Rules & without valid diploma from Medical Faculty Peshawar.	May be served upon show cause notice for removal from service and salary stopped.	
Malaria Supervisors (Merit list at Annex:III)	iv. Muhammad Amjed s/o Muhammad Afzal (Battagram)	Recruited in violation of the Approved S/Rules & without valid diploma from Medical Faculty Peshawar.	May be served upon show cause notice for removal from service and salary stopped.	
4	JCT(Physiotherapy) Merit list at Annex:IV	Sajid Ali s/o Bashir Khan (Battagram)	a) Matric with arts(science required) b) No valid diploma from Medical Faculty Peshawar.	May be served upon show cause notice for removal from service and salary stopped.
5	JCT Anaesthesia	Muhammad Rafiqullah Khan	Matric with science with valid diploma from Medical	May be allowed to continue service

5

	Merit list at Annexure-V	s/o Muhammad Aslam Khan(Bannu)	Faculty Peshawar, albeit not verified.	but after verification of the matric certificate and diploma from the concerned Board and Medical Faculty Peshawar. If found fake, should be served upon with Show Cause notice for removal from service.
6	Junior Clerks Merit list at Annexure-VI	i.Fahim Khan s/o Muhammad Bashir (Battagram) ii.Shahid Ali s/o Adam Khan(Battagram) → iii.S.Maqbool Shah s/o S.Muhammad Zahir Shah(Battagram) iv.Niaz Muhammad s/o Muhammad Faroosh(Battagram) v.Shah Faisal s/o Muhammad Afzal (Battagram)	a) Matric certificates of all the employees perused but not verified from the concerned Boards. b) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of the Matric Certificates, till then their salaries must be stopped.
7	Store Keeper	Dilshad s/o Said Hazrat	a) He was in-service Sweeper but his matric and dispenser	May be allowed to continue service.

	Merit list at Annexure-VII	(Battagram)	Certificates seem to be doubtful. b) ) Advertisement for the post not produced.	subject to producing of advertisement notice by the DHO Battagram and verification of both the certificates and if found bogus, may be served upon show cause notice for removal from service. Till then his salary must be stopped.
→ 8	JCT Dental Merit list at Annexure-VIII	Ihsanullah s/o Hashim Khan (Battagram)	a) Matric with science with diploma from Medical Faculty Peshawar and <u>BA</u> qualification but not verified b) ) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of <u>certificate, diploma</u> and <u>degree</u> and if found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.
9	JCT Surgical Merit list at Annexure-IX	i.Asadullah s/o Azmatullah (Mansehra)	a) Matric with science having no valid diploma b) ) Advertisement for the post not produced.	May be served upon with show cause notice for removal from service and salary stopped.

		ii.Ehsanullah s/o Fazal Rahim (Battagram)	<p>a)Matric with science 2<sup>nd</sup> divn: marks allotted of first divn:</p> <p>b)Zero marks given in the interview, even then selected.</p> <p>c)Although qualified OTA from Medical Faculty Peshawar, yet the certificate seems to be fake.</p> <p>d)8 marks for higher qualification allotted but no BA degree produced.</p> <p>e) ) Advertisement for the post not produced.</p>	<p>May be allowed to continue service subject to producing BA degree/advertisement notice by the DHO Battagram &amp; verification of certificate/diploma and if failed to produce BA degree/advertisement notice or the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.</p>
		iii.Rashid Khan s/o Ghulam Akber Khan (Battagram)	<p>a)No valid certificate/diploma from Medical Faculty Pesh: Even not selected by the DSC but favoured with recruitment order by Dr.Aqeel Bangash.</p> <p>b) ) Advertisement for the post not produced.</p>	<p>May be served upon show cause notice for removal from service and salary stopped.</p>
10	JCT Ophthalmology Merit list at Annex:X	i.Asif Afridi s/o Abdur Rahim (Battagram)	<p>a)He has been selected on the basis of having <u>degree in vision science from KMU</u> Peshawar but the same has not been verified.</p> <p>b) ) Advertisement for the post not produced.</p>	<p>May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of</p>

			Matric certificate/ degree and if found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.
JCT Ophthalmology Merit list at Annex:X	ii. Tanzeelur Rahman s/o Himayatullah (Battagram)	a) No diploma from Medical Faculty Peshawar. b) BA degree not produced but marks for higher qualification allotted. c) Advertisement for the post not produced.	May be served upon with show cause notice for removal from service and salary stopped.
JCT Cardiology Merit list at Annexure-XI	ii. Rafique Ahmad s/o Sherenzada (Swat)	a) No recruitment order produced. b) Matric with science having diploma from Medical Faculty Peshawar. c) According to Feroz Sr. Clerk of DHO Office Battagram the Tech: has been transferred to Swat. d) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram & verification of matric certificate, diploma and degree and if found bogus, must be served upon show cause notice for removal from service. Till then his salary must be stopped. DHO Battagram to inform the DHO/MS Swat where he has been transferred.

JCT Physiotherapy Merit list at Annex:XII	i. Mufti Salahuddin s/o Noorul Wahab (Battagram)	a) Matric with science having diploma from Medical Faculty Peshawar but the same seems suspicious. b) 6 marks for higher qualification allotted but FA certificate not produced. c) Advertisement for the post not produced.	May be allowed to continue service subject to producing of FA certificate/Advertisement notice by the DHO Battagram and verification of certificate/diploma and if failed to produce FA certificate or the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.
	ii. Mehboobullah s/o Rai Khan (Karak)	a) Matric with science. b) Diploma of Med: Faculty produced, seems fairly bogus c) Advertisement for the post not produced.	May be allowed to continue service subject to producing of advertisement notice by the DHO Battagram and verification of certificate/diploma. If found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.

13	Electrician Merit list at Annexure- XIII	i.Adil s/o Muhammad Niqab (Battagram)	a)advertisement for the post not produced. b)8 marks for higher qualification allotted but BA degree not produced.	May be allowed to continue service subject to producing of advertisement notice by DHO Battagram and verification of matric certificate etc. If failed to produce the advertisement notice, must be served upon show cause notice for removal from service. Till then his salary must be stopped.
		ii.Fasiullah s/o Syed Sakhi Shah (Battagram)	a)Matric certificate and BA degree produced but not verified as yet. b)Advertisement for the post not produced.	May be allowed to continue service subject to producing of Advertisement notice and verification of certificate/diploma. If failed to produce the advertisement notice by DHO Battagram and the documents found bogus, must be served upon with show cause notice for removal from service. Till then his



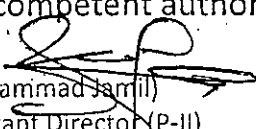
				salary must be stopped.
14	JCT Radiology Merit list at Annexure-XIV	i.Yar Muhammad s/o Muhammad Javed (Battagram)	a) Matric with science with no valid diploma. b) Advertisement for the post not produced.	May be served upon show cause notice for removal from service and salary stopped.
		ii.Sirajuddin s/o Firdus Khan (Mansehra)	a) Matric with science with no valid diploma. b) Advertisement for the post not produced.	May be served upon show cause notice for removal from service and salary stopped.
15	JCT Anaesthesia Merit list at Annexure- XV	i.Mujeebur Rahman s/o Shahroom Khan (Battagram)	a) Matric with science with diploma from Med: Faculty Peshawar but not verified as yet. b) 12 marks for higher qualification allotted but MA degress not produced. c) Advertisement for the post not produced.	May be allowed to continue service subject to producing of Advertisement notice by DHO Battagram and verification of certificate/diploma. If failed to produce the advertisement notice and the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.

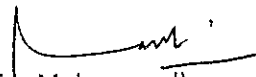
		ii. Yousaf Ali Khan s/o Fateh Khan (Battagram)	<p>a) Matric with science with certificate from Med: Faculty Peshawar but not yet verified.</p> <p>b) Advertisement for the post not produced.</p>	<p>May be allowed to continue service subject to producing of Advertisement notice by DHO Battagram and verification of certificate/diploma. If failed to produce the advertisement notice and the documents found bogus, must be served upon with show cause notice for removal from service. Till then his salary must be stopped.</p>
16	Plumber Merit list at Annex: XVI	Zahir Shah s/o Abdul Khaliq (Battagram)	<p>a) Matric with arts.</p> <p>b) No advertisement for the post produced.</p>	<p>May be allowed to continue service subject to producing of Advertisement notice by DHO Battagram and verification of certificate/diploma. If failed to produce the advertisement notice and the documents found bogus, must be served upon with show cause notice for removal from</p>

				service. Till then his salary must be stopped.
17	Generator Operator Merit list not produced.	Sher Bahadur s/o Jan Muhammad (Battagram)	a) No advertisement notice, no merit list and no documents produced.	May be served upon with show cause notice for removal from service and salary stopped.
18	Tube Well Operator Merit list not produced	Tufail Muhammad s/o Nazir Muhammad (Battagram)	a) No advertisement notice, no merit list and no documents produced.	May be served upon with show cause notice for removal from service and salary stopped.
19	Class-IV employees Merit list not produced	As per list at Annexure <del>XVI</del> <b>XVII</b>	a) No advertisement notice, no merit list and no documents produced.	May be served upon with show cause notice for removal from service and salary stopped.

Interestingly salaries of the above employees are being disbursed from the date of their recruitment but surprisingly the offices of the present DHQ Battagram and MS DHQ Hospital Battagram badly failed to produce the relevant documents to the Enquiry Committee, resulting in late submission of the enquiry report.

The above recommendations are submitted for perusal and approval or as the competent authority deems fit.

  
(Muhammad Jamil)  
Assistant Director (P-II)  
Directorate General Health  
Services, Khyber Pakhtunkhwa  
Peshawar.

  
(Dr. Niaz Muhammad)  
SMO, Civil Hospital Battal District Manshera.

9

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Rashid Khan .....Appellant

**VERSUS**

Govt of K.P.K and Others.....Respondents

**SERVICE APPEAL**

**REJOINDER ON BEHALF OF APPELLANT AS UNDER**

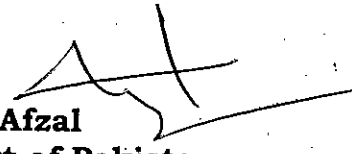
**INDEX**

S#	Description of documents	Annexure	Page#
1.	Rejoinder	-	1 to 6
2.	Certificates	"A"	7
3.	Reply	"B"	8 to 10
4.	Affidavit	"C"	11

**Dated 13<sup>th</sup> October, 2016**

**Rashid Khan**  
(Petitioner)

Through: -

  
**Khan Afzal**  
**Supreme Court of Pakistan**  
Mansehra

**BEFORE THE SERVICE TRIBUNAL  
KPK PESHAWAR**

Rashid Khan .....Appellant

**VERSUS**

Govt of K.P.K and Others.....Respondents

**SERVICE APPEAL**

**REJOINDER ON BEHALF OF APPELLANT AS UNDER**

Respectfully Sheweth:-

**REPLY AGAINST THE PRELIMINARY  
OBJECTION RAISED BY RESPONDENTS**

**PRELIMINARY OBJECTION**

1. Para No.1 is incorrect.
2. Para NO.2 is incorrect.
3. Para No.3 is incorrect.
4. Para No.4 is incorrect.

2

5. Para No.5 is incorrect. Appellant preferred Departmental appeal against the Show Cause Notice dated 23.07.2015, on 31.07.2015 before Resp. No. 2 through proper Channel, which was forwarded by Resp. No 3 to Resp. No 2 for a sympathetic and favorable consideration copies of appeal and letter are already available on Court file.

6. Para No 6 is incorrect Respondent have no right to agitate any ground behind the pleading later on.

**REPLY AGAINST FACTUAL OBJECTION  
RAISED BY THE RESPONDENT**

1. Para NO.1 is correct
2. Para No.2 is correct
3. Para No.3 is correct
4. Para No.4 is correct.
5. Para No.5 is incorrect and Para NO. 5 of the writ Petition is correct.
6. Para No.6 is incorrect. Departmental Selection Committee recommended the Appellant for appointment. Para No. 6 of the appeal is correct.
7. Para No. 7 is correct, appellant was appointed on 28.05.2012 after completing all legal and codel formality on merits by competent Authority and appellant took the charge on 28.05.2012.

- 3
8. Para No 8 is incorrect. And para no 8 of the appeal is correct. No enquiry was conducted by the respondent /Department as per law, rules and regulations. Respondent No.4 declared that in the light of Medical faculty letter NO 1245/MF dated 26.03.2015, enquiry against the appellant is not valid.
  9. Para NO.9 reply of the respondent is incorrect & Para No 9 of the appeal is correct.
  10. Para NO.10 is incorrect and Para NO 10 of the appeal is correct. Appellant produced his relevant document, verification letter etc. to respondents in time
  11. Para No 11 is incorrect that the appellant was served the department till termination i.e. 11.09.2015, in this respect Respondent No 3. Passed following remarks related to appellant {he is hard working, obedient and regular in duty. He is well oriented, regular and energetic technician, his behavior with his senior and other staff members is good}. Copy of certificate dated.04.06.2016. is hereby **(annexed as Annexure " P "**)

Later on petitioner Salary was released by the Respondents the direction of the High Court.

4

12. Para No.12 is incorrect appellant was appointed correctly after completing all the legal and code formalities the document of the appellant is correct. Appellant documents/Certificates were verified and declared genuine by Competent Authority.

13. Para No.13 is incorrect Para No 13 of the appeal is correct

### **GROUND**

- i. Incorrect the impugned order and its contents are wrong, illegal and against the Service laws and rules
- ii. Incorrect. Para No (ii) of the appeal is correct.
- iii. Para No (iii) incorrect. Para NO.(iii) of appeal is correct, appellant documents were verified by the department from relevant authority, which were found correct.
- iv. Incorrect Para No. iv of the appeal is correct. After appointment of the appellant, appellant applied for the registration of Diploma/ Certificate to Secretary Medical Faculty KPK. Later on copy of registration was handed over to Department by the appellant.
- v. Incorrect so called enquiry is wrong illegal, ex-party and said enquiry is ineffective upon the right of the appellant.



- 5
- vi.** Incorrect, the respondent have released the salary of the appellant on the direction of Honorable High Court during the pendency of the above appeal.
  - vii.** Para No.vii is incorrect para vii of this appeal is correct. Vide letter of respondent No 4 dated 26.03.2015 Medical faculty KPK verified the document of the appellant in spite of the said verification of the document appellant was wrongly removed from the service on 11.09.2015.
  - viii.** Incorrect. Para No, (viii) of the appeal is correct. The baseless allegation upon which the appellant was removed from the service are the wrong and against the law and natural justice.
  - ix.** Incorrect, Para NO (ix) of the appeal is correct.
  - x.** Incorrect. Appellant submitted appeal against the Show Cause Notice dated 23.07.2015 on 31.07.2015 to Respondent. NO.2 / D.G. through proper channel which was forwarded by Respondent. No.3 to respondent No 2. Copies are available already with appeal on Court File at page No 59 and 6 during the pendency of appeal, appeal was wrongly removed by the respondent.
  - xi.** Para No 11 of the reply of the respondents is incorrect appellant in spite of the pending appeal against the

show cause notice to D.G i.e respondent No 2, appellant replied the show cause notice, no opportunity of personal hearing was given to appellant by the respondent No.3 copy of the reply is hereby annexed as annexure " Q "

**PRAYER**

It is requested that Appeal of the appellant may kindly be accepted and appellant service be restored with all back benefits.

Dated: \_\_\_\_\_

*[Signature]*

Rashid Khan

.....Appellant

THROUGH

*[Signature]*

**KHAN AFZAL**

ADVOCATE SUPREME COURT OF PAKISTAN (MANSEHRA)

**AFFIDAVIT**

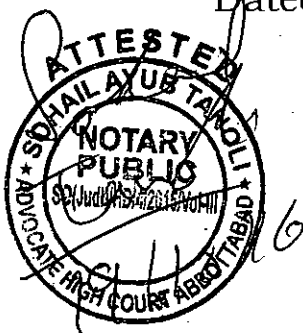
I, Rashid Khan do hereby solemnly affirm and declare that the contents of foregoing rejoinder are true and correct to the best of my knowledge

Dated: \_\_\_\_\_

*[Signature]*

Rashid Khan

.....Deponent



7  
DISTRICT HEAD QUARTER  
HOSPITAL

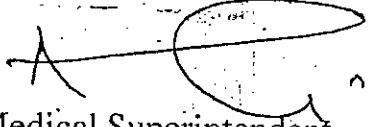


EXPERIENCE CERTIFICATE

It is to certify that Mr. Rashid Khan S/O Ghulam Akbar worked in DHQ Hospital Battagram as JCT Surgical since 28<sup>th</sup> May 2012 to 11<sup>th</sup> September 2015. He is hardworking, obedient and regular in duty. He is well oriented, regular and energetic technician. His behavior with his senior & other staff members is good.

I wish him successful in future.

Dated 04.06.2016

*Rashid*  
  
Medical Superintendent  
DHQ Hospital Battagram  
*Rashid*  
Medical Superintendent  
DHQ Hospital Battagram

۱۔ بحوالہ جینی انگریزی نمبر 36-2534 مورخہ 23-07-2015 جناب آپ کے دفتر سے سائل کو نوکری سے برطرف کرنے کا شوکار نوٹس جاری کر دیا گیا ہے۔ جس کی وجہ سے سائل کے بھرتی میں قانونی تقاضے پورے نہ ہونے کو بیان کیا گیا ہے۔ جن کیلئے سائل ذیل عرض فرماتے ہیں۔

۲۔ یہ کہ سائل جس آسامی پر بھرتی شدہ ہے (JCT Surgical) اس کے لئے باقاعدہ طور پر روز نامہ آج، مشرق پشاور سے اشتہار جاری ہوا ہے اور مذکورہ آسامی سیریل نمبر 2 پر درج ہے اشتہار درخواست کے ہمراہ لف ہے۔ (Page No1)

۳۔ یہ کہ سائل نے اشتہار کے مطابق درخواست کے ہمراہ تمام تعلیمی اسناد مذکورہ دفتر میں جمع کرا دی ہے ہمراہ لف ہے۔ No.2

۴۔ یہ کہ ادارہ ہڈانے سائل کو 08.02.2012 کا اشتہار کے مطابق شارٹ لسٹ امیدواروں میں شامل کر کے انٹرویو کیلئے بلا یا اور DSC نے سائل سے انٹرویو لیکر باقاعدہ طور پر سائل مذکورہ کو 53 ہمدیے جو کے میرٹ لسٹ کے مطابق دوسری پوزیشن بنتی ہے اور کل تین بندے مذکورہ آسامی پر بھرتی ہوئے ہیں۔ ہمراہ لف ہے No.3

۵۔ یہ کہ ادارہ کے دو ان سائل کے مطابق مائجی پائل ہوتا رہا اور آخر میں سائل سے (1) KPK میڈیکل فیکلٹی رجسٹریشن (2) Equivalency ٹیٹھیٹا ہا مل لیا گیا تا کہ قانونی طور پر بھرتی سے پہلے سائل کے کوائف مکمل ہو جائے اور سائل قانونی طور پر ہی بھرتی ہو جائے۔

۶۔ مندرجہ بالا شرائط کو پورا کرنے کیلئے سائل مذکورہ نے پیپے میڈیکل فیکلٹی KPK سے رجسٹریشن کیلئے رابطہ کیا تو میڈیکل فیکلٹی کی رجسٹریشن ڈیپارٹمنٹ نے سائل مذکورہ سے اس کے معزت کی کہ ICMT-PIMS اسلام آباد کے طلباء اور میڈیکل فیکلٹی کے درمیان ایس فیصلہ کیلئے پشاور ہائی کورٹ میں زیر سماعت ہے اور ہائی کورٹ کے حتمی فیصلے سے پہلے میڈیکل فیکلٹی کوئی فیصلہ نہیں کر سکتی۔

بالآخر 11.04.2012 کو ہائی کورٹ پشاور نے ICMT-PIMS اسلام آباد کے طلباء کے حق میں فیصلہ دے دیا اور واضح طور پر KPK میڈیکل فیکلٹی سے کہا گیا کہ ICMT-PIMS اسلام آباد کے طلباء کو فوری طور پر رجسٹریشن دی جائے۔

سائل مذکورہ نے باقاعدہ طور پر مندرجہ بالا فیصلے کو وصول کرنے کیلئے ایس جمع کر کے فیصلے کا نقل ہائی کورٹ پشاور سے حاصل کیا، ہمراہ

لف ہے۔ Page No.4

یہ کہ سائل نے Equivalency سرٹیفکیٹ حاصل کرنے کیلئے رجسٹر ارا اینڈ کنز بلر آف امتحانات ICMT-PIMS اسلام آباد کو درخواست دی اور واضح طور پر عرض کیا کہ سائل مذکورہ کی Whole Job Training ادارہ ہڈانے کی طرف سے

Surgical Units میں ہوائے لید مسائل کو اس کی Equivalency سرٹیفکیٹ درکار ہے۔

رجسٹر اریڈ کنٹریبارف امتحانات کے مسائل کی درخواست منظور کردی اور مسائل کو باقاعدہ طور پر 14.05.2012 کو مذکورہ

سرٹیفکیٹ جاری کر دیا۔ ہمراہ لف ہے۔ page no. 5

۸۔ یہ کہ مسائل نے دونوں مطلوبہ کاغذات ادارہ ہذا میں جمع کردی اور باقاعدہ طور پر DSC کی Recommendation کے

مطابق جو کہ مسائل مذکورہ کے بھرتی لینے میں واضح طور پر لکھا ہوا ہے۔ اس اسی منظوری کی تحت 28.05.2012 کو مسائل کی بھرتی

نسل میں لائی گئی ہے۔ ہمراہ لف ہے۔ page no 6

۹۔ یہ کہ مسائل کے بھرتی سے لیکر انکو انٹری تک ادارہ ہذا نے نہ مسائل سے میڈیکل فیکلٹی کی رجسٹریشن کا مطالبہ کیا اور نہ ہی مسائل کو

انکو انٹری کمیٹی کے سامنے بلایا گیا تاکہ مسائل اپنی صفائی پیش کر سکے۔

یہ متعلقہ تھیں۔ اس سلسلے کے امور میں مسائل کے مندرجہ بالا مذکورہ کاغذات پیش نہیں کیے گئے۔

انکو انٹری مسائل کے خلاف ہوئی۔

۱۱۔ یہ کہ مذکورہ غلط انکو انٹری رپورٹ ملتے ہی ضلع بنگلہ رام کے ادارہ صحت کے متاثرہ پیرامیڈیکس اور کلاس فور ملازمین میں کہرام مچ گیا۔

اس کے بعد مذکورہ متاثرہ ملازمین نے انصاف کی فراہمی اور غلط انکو انٹری رپورٹ کے خلاف وزیر اعلیٰ کے پی کے کو اپیل کی جس پر

وزیر اعلیٰ نے مذکورہ غلط انکو انٹری رپورٹ بند کرنے اور اس پر کسی قسم کی کارروائی نہ کرنے کا حکم صادر فرمایا اور اس کے ساتھ ہی ادارہ

ہذا کے سیکرٹریٹ نے وزیر اعلیٰ کے حکم پر کارروائی کرتے ہوئے دونوں لیٹرز کے پی کے ہسپتال ڈائریکٹریٹ کو بھیج دی۔

یہ کہ DGHS نے وزیر اعلیٰ اور سیکرٹری صحت کے پی کے کے لیٹرز کا حوالہ دیتے ہوئے DHO بنگلہ رام کو لیٹر کیا اور مذکورہ متاثرہ

ملازمین کے حوالے سے Detail Comments طلب کر لیے۔ ہمراہ لف ہے۔ page No 7

۱۲۔ یہ کہ مسائل نے اس سے بعد میڈیکل فیکلٹی کی رجسٹریشن میں اور دیگر وزارتات وغیرہ درخواست کے ہمراہ میڈیکل فیکلٹی کے متعلقہ

دفتر میں جمع کیے اور سیکرٹری میڈیکل فیکلٹی نے مسائل کی درخواست پر کارروائی کرتے ہوئے مسائل کے اسناد کی دیر پھیلانے کے باعث

مسائل کو متعلقہ شعبہ کار رجسٹریشن سرٹیفکیٹ جاری کر دیا۔ جس کو مسائل نے DHO آفس بنگلہ رام میں جمع کر دیا اور دفتر ہذا نے سیکرٹری

میڈیکل فیکلٹی کو دیر پھیلانے سے بچنے دیا جس سے سیکرٹری میڈیکل فیکلٹی نے دیر پھیلانی کر کے DHO آفس بنگلہ رام کو اپس بھیج دیا جو

کہ ہمراہ لف ہے۔ page no 8

۱۳۔ یہ کہ مسائل کے کاغذات کی دیر پھیلانے کے دوران DHO بنگلہ رام نے ایم۔ ایس۔ DHQ ہسپتال بنگلہ رام کو مذکورہ انکو انٹری لیٹر کا

حوالہ دیتے ہوئے 8 پیر میڈیکل سٹاف کو ڈیوٹی دینے اور حاضری لگانے سے روک دیا جن میں سیریل نمبر 5 پر مسائل ہذا کے نام کو

نہیں لکھا گیا۔ مذکورہ بالا سلسلے کے دوران DHO نے ایم۔ ایس۔ DHQ ہسپتال بنگلہ رام کو مذکورہ انکو انٹری لیٹر کا

سیریل نمبر 5 اور نمبر 6 کو حاضری لگانے اور باقاعدہ ریکارڈ یونی کرنے کے احکامات جاری کر دیے جو کہ ہمراہ لف ہے۔ page no.9

۱۳۔ یہ کہ اس کے بعد DHO نے DGHS کے پی کے کو بذریعہ لیٹر نمبر 63-1762 واضح کر دیا کہ سائل مذکورہ کے کاغذات درست ہے اور انکو ازری کمیٹی کے رگائے گئے اعتراضات غلط ہیں، اس لیٹر کے جواب میں انکو ازری کرنے والے اسسٹنٹ ڈائریکٹر نے DHO کو ام کی مذکورہ لیٹر دستاویز کے تحت الفاظ میں انکو ازری لے گا اور اعتراضات سائل پر انکو ازری کی سفارش کی جس کی بنیاد پر ایم۔ ایس ڈی ایچ کیو ہسپتال بنگلہ رام نے سائل کے خلاف شوکاژ نوٹس جاری کر دیا۔ جو کہ ہم اوائف ہے۔

page no 10

۱۵۔ یہ کہ سائل کو شوکاژ نوٹس ملنے کے بعد سائل نے ڈائریکٹر جنرل ہیلتھ کے پی کے کو انصاف کی فراہمی کیلئے اپیل کیا جس پر DHQ ہسپتال کے ایم۔ ایس نے بھی سائل کے حق میں فیصلہ کرنے کی سفارش کی، لیکن بد قسمتی سے سائل کی فائن ڈائریکٹر جنرل کو پہنچنے سے پہلے مذکورہ غلط انکو ازری آفیسر کے ہاتھ میں آگیا جس کی وجہ سے سائل ابھی تک انصاف سے محروم رہا۔ (۱۱)۔

۱۶۔ یہ کہ ادارہ ہذا سائل کے مذکورہ بالا کوائف کی کسی بھی وقت جانچ ہو سکتی ہے۔

۱۷۔ یہ کہ سائل سے مسلسل آٹھ (8) مہینوں سے بغیر تنخواہ کے ڈیوٹی لی جا رہی ہے جو کہ ملازمت سائل کا واحد ذریعہ معاش ہے۔

اور اب سائل کو ملازمت سے برطرفی کا فیصلہ معمولی اقدام بھی اٹھایا جا رہا ہے۔

۱۸۔ اگر بھرتی کرنے والے حاکم نے کوئی کوتاہی یا کمی پیش کی ہے تو اس کی سزا سائل کو دینا قرین انصاف نہیں۔

لہذا امتیاز نہ استدعا ہے کہ مندرجہ بالا جوابات کی روشنی میں سائل کے حال پر رحم فرما کر Show Cause Notice بلا مزید کارروائی داخل دفتر فرمایا جا کر سائل کی تنخواہ کھولنے، اور سائل کو اپنے عہدے پر ملازمت برقرار رکھنے کا حکم صادر فرمایا جائے۔

*Handwritten signature*

راشد خان ولد غلام اکبر

JCT Surgical ڈی ایچ کیو

ہسپتال بنگلہ رام

11

**BEFORE THE SERVICE TRIBUNAL  
KPK PESHAWAR**

Rashid Khan .....Appellant

**VERSUS**

Govt of K.P.K and Others.....Respondents

**SERVICE APPEAL**

**AFFIDAVIT**

Contents of Appeal and rejoinder are correct and reply of the respondents are wrong I Rashid Khan Petitioner do hereby solemnly affirm and declare that the content of rejoinder are true and correct to the best of my knowledge and belief

Date 13<sup>th</sup> October, 2016



Rashid Khan

.....Deponent

BEFORE THE SERVICE TRIBUNAL,  
KPK PESHAWAR

Rashid Khan son of Ghulam Akbar, Ex-JCT  
(Surgical) District Headquarter Hospital,  
Battagram.....Appellant

VERSUS

1. Government of KPK, through Secretary Health,  
KPK Peshawar.
2. Director General Health KPK Peshawar.
3. Medical Superintendent, District Headquarter  
Hospital, Battagram.
4. District Health Officer, Battagram.  
.....Respondents.

SERVICE APPEAL NO.49/16

*put up to the court with  
relevant app. w.*

INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of application.	.....	122
2	Affidavit.	.....	3

Dated 25.04.2017

*Rashid Khan*  
Rashid Khan  
(DEPONENT)

Through

*Khan Afzal*  
KHAN AFZAL,

Advocate Supreme court, of Pakistan.



BEFORE THE SERVICE TRIBUNAL,  
KPK PESHAWAR

Rashid Khan son of Ghulam Akbar, Ex-JCT  
(Surgical) District Headquarter Hospital,  
Battagram.....Appellant

VERSUS

1. Government of KPK, through Secretary Health,  
KPK Peshawar.
2. Director General Health KPK Peshawar.
3. Medical Superintendent, District Headquarter  
Hospital, Battagram.
4. District Health Officer, Battagram.  
.....Respondents.

SERVICE APPEAL NO.49/16

APPLICATION FOR  
URGENT HEARING OF APPEAL.

Respectfully Sheweth!

1. That, the above-titled appeal is pending  
before this Honourable Tribunal in which  
next date is fixed as 19.07.2017 for  
arguments.
2. That, the date fixed is too long and  
valuable rights of the appellants are  
attached with said appeal. That the  
necessity of the instant application arises  
on the basis of following concomitants.
3. That, the petitioner/appellant is poor  
person and has nothing mean of earning

(2)

except underlying appeal job and petitioner/appellant has minors children.

4. That, the same nature appeals/cases has already been decided by this Honourable tribunal early.
5. That, due to disputed order which has challenged by appellant in appeal, petitioner is facing financial as well as mental problems.
6. That, instant appeal is pending before this Honourable Tribunal since January 2016.
7. That, the superior courts are in favour of quick disposal.
8. That, if above titled appeal is not fixed for early hearing than due to this petitioner/appellant will cause irreparable loss.

**So, it is humbly prayed that**  
above-titled appeal may kindly be fixed for early hearing.

Dated 25.04.2017

Rashid Khan  
...Appellant

Through



**KHAN AFZAL,**  
Advocate High Court,  
Mansehra.



**BEFORE THE SERVICE TRIBUNAL,  
KPK PESHAWAR**

Rashid Khan son of Ghulam Akbar, Ex-JCT  
(Surgical) District Headquarter Hospital,  
Battagram.....Appellant

**VERSUS**

Government of KPK, through Secretary Health,  
KPK Peshawar and others .....Respondents

**SERVICE APPEAL**

**AFFIDAVIT.**

I, Rashid Khan son of Ghulam Akbar, Ex-JCT (Surgical) District Headquarter Hospital, Battagram, Appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing application are true and correct and nothing has been concealed from this Honourable Tribunal,

Dated 25.04.2017

*Rashid Khan*  
Rashid Khan  
(DEPONENT)

