

06.06.2017

Clerk to counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 11.07.2017 before S.B.



(Ahmad Hassan)  
Member

11.07.2017

None present on behalf of the appellant. Notice be issued to appellant and his counsel for attendance for 17.08.2017 before S.B.



(Muhammad Amin Khan Kundi)  
Member

0-----11 17.08.2017

Appellant absent. Learned counsel for appellant also absent. Mr. Kabir Ullah Khattak, Assistant Advocate General for the respondents present. Case called for several times but no one appeared on behalf of the appellant. Perusal of preceding order sheet would show that on the previous date too, no one appeared on behalf of appellant. Consequently the present appeal is dismissed in default. No order as to costs. File be consigned to be record room.

**ANNOUNCED**  
17.08.2017



(Muhammad Hamid Mughal)  
Member

14.03.2017

Clerk to counsel for the appellant present. Clerk to counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 18.04.2017 before S.B.



(AHMAD HASSAN)  
MEMBER

18.04.2017

Appellant in person present and requested for adjournment. Request accepted. To come up for preliminary hearing on 02.05.2017 before S.B.



(Ahmad Hassan)  
Member

02.05.2017

Clerk to counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 06.06.2017 before S.B.



(Ahmad Hassan)  
Member

20.12.2016

Counsel for the appellant present. Counsel for the appellant seeks adjournment. Adjournment granted. To come up for preliminary hearing on 18.01.2017,

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

18.01.2017

Clerk to counsel for the appellant present. Requested for adjournment. Request accepted. To come up for preliminary hearing on 06.02.2017 before S.B.

  
(AHMAD HASSAN)  
MEMBER

06.02.2017

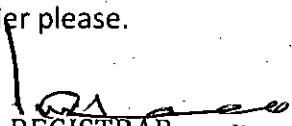

None for the appellant present. Notices be issued to the appellant and his counsel. To come up for preliminary hearing on 14.03.2017 before S.B.

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

Form- A  
FORM OF ORDER SHEET

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

Case No. 1234/2016


S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	14/12/2016	<p>The appeal of Dr. Aftab Ahmad resubmitted today by Mr. Muhammad Tahir Zaman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	15-12-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20-12-2016</u></p> <p> CHAIRMAN</p>

The appeal of Mr. Dr. Aftab Ahmad Type D Hospital Panyala D.I.Khan received today i.e. on 01.12.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Copy of arrival report mentioned in para-i of the grounds of the appeal (Annexure-L) is not attached with the appeal which may be placed on it.
- 3- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 2013 /S.T,

Dt. 2/12/2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Tahir Zaman Adv. Pesh.

در استغلی کسلی سے دوبار جمع کیا گیا ہے  
کسی پوری ہوئی ہے۔

14/12/2016  


BEFORE THE KHYBER PSKHTUNWA SERVICE TRIBUNAL PESHAWAR.

IN RE:

Service Appeal No. 1234 / of 2016

Doctor Aftab Ahmad son of #

Muhammad Ali Khan Khattak ... Appellant

VERSUS

Secretary Health, Health Department

Khyber Pakhtunkhwa, Civil Secretariat


Peshawar and others ... Respondents

INDEX

S.No	Description Of Documents	Annexures	Pages
1.	Service Appeal		1 -- 4
2.	Affidavit		0 -- 5
3.	Copy of transfer order dated 17.03.2016	A	6
4.	Copy of office order dated 04.07.2017	B	7
5.	Copy of departmental Appeal	C	8-13
6.	Copy of reminder letter dated 19.10.2016	D	9-14
7.	Copy of letter no 108 dated 1.07.2016	E	15
8.	Copies of FIR no 310 dated 30.06.2016 and certificate	F-G	16-17
9.	Copy of tehsildar report of tehsil takhti nasrati dated 30.06.2016	H	18-19
10.	Copy of the complaint of relatives of the deceased	I	20
11.	Copy of the referel letter for provision of ambulance to driver	J	21
12.	Copy of office order by DHO karak dated 01.07.2016	K	22
13.	Copy of arrival report dated 01.07.2016(afternoon)	L	23-24
14.	Copy of statement submitted for the inquiry to AC Takht-e-Nasrati dated 19.07.2016	M	25-27
15.	Vakalat nama		28

  
Appellant

Through

  
(Muhammad Tahir Zaman)

Advocate, High Court

B-4 Haroon Mansion

Khyber Bazar, Peshawar.

Cell no. 0345-9109223

Dated: / /2016

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR.**

Service Appeal No. 1234 / of 2016

Svc Appeal Dr. Aftab Ahmad son of  
Muhammad Ali Khan Khattak, resident of  
House # 17, Street # 2, Sector E-2.  
Phase-1 Hayatabad Peshawar,

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1242

Dated 01-12-2016

Presently working at Type D hospital panyala.D.I. Khan... .. Appellant

**VERSUS**

1. Secretary Health, Health Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
4. Principal Medical Officer, I/C Type "C" Hospital, Takhti -E- Nasrati District Karak ... .. Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE OFFICE ORDER No. SO(H) E-11/4-1-2016 DATED 04.07.2016, WHEREBY THE APPELLANT WAS TRANSFERRRED FROM TYPE "C" HOSPITAL TAKHT-E-NASRATI KARAK ON DISPOSAL OF DISTRICT HEALTH OFFICER D.I. KHAN IS ILLEGAL, VOID, WITHOUT ANY MERIT, PREMATURE AND WITHOUT ANY KIND OF INQUIRY AND AGAINST THE RULES AND REGULATION OF CIVIL SERVICES AND BASED OF ILLEGAL ON ILLEAGAL REPORT OF RESPONDENT No.4, PMO OFFICER.

Filed to-day  
*Singh*  
Registrar 01/12/16

Respectfully Sheweth

The appellant submits as under:-

page 01

That the appellant was appointed in respondent Department and serving as Civil Servant(BPS-17) on Regular Basis in the Health Department Khyber Pakhtunkhwa since 12.12.1998.

2. That the appellant earlier; was transferred to Type "C" Hospital Takhti-e-nasrati Karak through order dated 17.03.2016, against which the service appeal no.722/2016 is admitted for regular hearing. (Copy of the order dated 17.03.2016 is attached as annexure A).
3. That the appellant was once again transferred through Office Order No. SO(H)E-11/4-1/2016 dated 04.07.2016 on administrative ground without any prior inquiry which is against the law of civil services. (Copy of the Office order dated 04.07.2016 is attached as annexure B).
4. That feeling aggrieved the appellant filed Departmental Appeal to the competent authority but the same was not responded within statutory period, hence the present appeal. (Copy of the Departmental Appeal is attached as annexure C)
5. That the appellant again gave written reminder to the competent authorities of dated 19.10.2016 but no response was given to the appellant appeal till this date. (copy of the reminder letter of dated 19.10.2016 is attached as an annexure D).
6. That due to the above mentioned reasons the appellant prefers the instant appeal on the following grou7nds amongst the others:-



**GROUNDS:**

- a. That due to impugned transfer order the appellant has not been treated in accordance with law and his rights secured and guaranteed under the law has been violated.
- b. That the appellant was not treated in accordance with law and discrimination of the respondents department is highly deplorable and condemnable, being without any authority, unlawful and against the norms of justice.
- c. That the appellant transfer order was on the reason of administrative grounds and on the illegal complaint of refusal from Government Duty by respondent No. 4, through letter No. 108 dated 01.07.2016 (addressed to DHO karak) which is against the norms of justice and violative of the rules and regulations. (Copy of the letter No.108 dated 1.07.2016 is attached as an annexure –E)
- d. That the mentioned FIR No. 310 dated 30.06.2016, time of occurrence of the case FIR is 19:20 hours and certificate of Duty timing at that time was assigned to one Doctor namely Irfan-ud-Din. (Copies of the FIR No.310 dated 30.06.2016 and certificate are attached as annexures (F-G)
- e. That the timing of emergency situation of said FIR also mentioned in the report in Urdu of tehsildar Takht-e-Nasrati (Mr. Sher Qiyanus) dated 30.06.2016 is established which was submitted to concerned offices but the respondent No.4 misguided the said report against the appellant rather than the Doctor Irfan-ud-Din, which is against the law and violative of the rights of appellant. (copy of tehsildar report is attached as an annexure H)

- f. That the complaint of relatives namely Mr. Sajid Umar etc; of the deceased person and mentioned FIR, but by ulterior motives and having grudges against the appellant, respondent No.4 deliberately included the name of the appellant and timing was also tampered with.(Copy of the complaint letter by the relatives is attached as annexure "I").
- g. That in complaint the respondent No.4 wrongly and illegally mentioned non-arrival on duty by the appellant for hours, rather the appellant referred one of the injured person (Mr.Rahmat Ullah) of the mentioned letter No. 108 dated 01.07.2016 to other hospital, Bannu at 08:45 PM dated 30.06.2016. (Copy of refer letter for provision of ambulance to driver is attached as an annexure 'J').
- h. That the District Health Officer Karak issued the Office order vide No.1814-18 dated 01.07.2016 and gave the reference of deputy commissioner Karak and the services of the appellant were transferred to RHC Shnawa Gudi Khel Karak without any written reference of deputy commissioner karak and also any kind of inquiry was conducted. Moreover, DHO karak also directed assistant commissioner tehsil Takht-e-Nasrati karak to conduct the inquiry in the matter. (copy of office order by DHO karak is attached as an annexure K)
- i. That the appellant still did the compliance for the unauthorized office order of DHO karak(even DC karak and DHO karak were not authorized for the transfer of the appellant without any prior inquiry) and submitted arrival report to RHC Shnawa Gudi Khel karak on dated 01.07.2016 ( afternoon) (copy of the arrival report is attached as an annexure L)

- j. That in the response the appellant properly attended the office of the assistant commissioner tehsil Takht-e-Nasrati on dated 18.07.2016 and submitted written statement to him on dated 19.07.2016 under intimation to DGHS and secretary Health Peshawar. (copy of the statement of the appellant of dated 19.07.2016 is attached as an annexure M)
- k. That the appellant was not afforded any opportunity to defend, thus condemned unheard.
- l. That no such action is warranted without any proof and opportunity of defense, thus committing an act which is against the fundamental rights of the appellant and is against the constitutional guarantees available.
- m. That the appellant is innocent and has falsely been victimized.
- n. That without conducting any kind of inquiry and without giving any opportunity of self defense, the appellant was illegally made responsible of an act, which is not made by appellant.
- o. That such kind of transfer on the complaint of refusal of duty etc will have a stigma on the service record of appellant and would adversely affect the service appellant.
- p. That any other ground which has not been specifically taken may kindly be allowed to argue the same.

It is, therefore, humbly prayed that on acceptance of the instant Appeal the respondents may graciously be directed to cancel the impugned order of dated 4/7/2016 as prayed for and if necessary proper inquiry may kindly be conducted and the charges proved

against any Officer, may be dealt with according to law alongwith and proper order deems proper in favour of the appellant against the respondents.



Appellant

Through:



(Muhammad Tahir Zaman)

Advocate, High Court

Dated: / 11 /2016

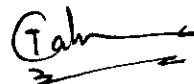
B-4 Haroon Mansion

Khyber Bazar, Peshawar.

Cell # 0345-9109223

**CERTIFICATE:**

Certified that as per instructions of my client, no such Service Appeal on behalf of the appellant has earlier been filed in this Honorable Service Tribunal on the subject matter.



Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR.

IN RE:

Service Appeal No. \_\_\_\_\_ / of 2016

Doctor Aftab Ahmad son of

Muhammad Ali Khan Khattak ... .. Appellant

VERSUS

Secretary health, health department,

Khyber pakhtunkhwa, civil secretariat

Peshawar and others ... .. Respondents

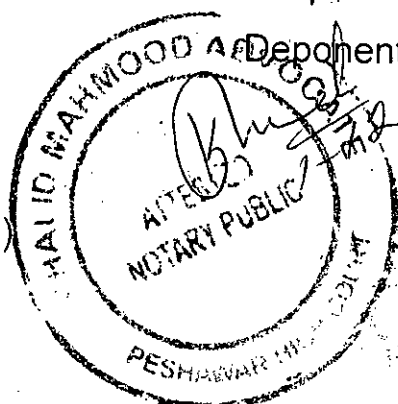
AFFIDAVIT

I, Dr. Aftab Ahmad son of Muhammad Ali Khan Khattak, resident of House # 17, Street #, Sector E-2, Phase -1 Hayatabad Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable service tribunal.

IDENTIFIED BY:

(Muhammad Tahir Zaman)

Advocate, Peshawar.



3

A

9

A

Annexure -

6



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar the 17<sup>th</sup> March-2016

NOTIFICATION

No.SO(E)H-II/4-1/2016 The Competent Authority is pleased to transfer the following Doctors with immediate effect in the best public interest.

S.No	Name of Doctor	From	To
1	Dr. Haroon Taj Medical Officer (BPS-17)	DHQ Hospital Karak	DHO Office Karak against the vacant post of DTO
2	Dr. Arshad Sohail Medical Officer (BPS-17)	Civil Hospital Bahadar Khel Karak	Women & Children Hospital Karak against the vacant post
3	Dr. Aftab Ahmad Medical Officer (BPS-17)	Coordinator LHW Program DHO Office Karak	Type-C Hospital Takhti Nasrati Karak against the vacant post
4	Dr. Mudasir Bilal Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Women & Children Hospital Karak against the vacant post
5	Dr. Baseer Ullah Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Women & Children Hospital Karak against the vacant post
6	Dr. Shafiqah Khial WMO (BPS-17)	Type-D Hospital Latamber Karak	Type-D Hospital Takhti Nasrati Karak
7	Dr. Wahid Ullah Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Type-D Hospital Latamber Karak
8	Dr. Abid Imran Medical Officer (BPS-17)	Type-C Hospital Takhti Narati Karak	Type-D Hospital Latamber Karak

- Sd/-  
SECRETARY HEALTH  
HEALTH DEPARTMENT

Endst. of even No. & Date.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Coordinator Emergency Operation Centre Peshawar.
4. District Health Officer Karak.
5. MS DHQ Hospital Karak.
6. MS Women and Children Hospital Karak.
7. District Accounts Officer Karak.
8. Deputy Director (IT) Health Department.
9. PA to Deputy Secretary-I, Health Department.
10. PA to Additional Secretary (E), Health Department.
11. PA to Project Manager DHIS office of DGHS Peshawar
12. PS to Secretary Health, Khyber Pakhtunkhwa.
13. Doctors concerned.

Accepted  
True Copy

*[Signature]*  
SECRETARY HEALTH



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

(A) (B)

7

Dated Peshawar the 4<sup>th</sup> July-2016

**NOTIFICATION**

No.SO(H)E-II/4-1/2016. The Competent Authority is pleased to place the services of Dr. Aftab Ahmad Medical Officer (BS-17), Type-C Hospital Takhti Nasrati Karak at the disposal of District Health Officer, D.I. Khan on administrative grounds with immediate effect.

**SECRETARY HEALTH  
HEALTH DEPARTMENT**

**Endst of even No. and Date.**

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 3697-98/E.I (A-165) dated 04.07.2016.
3. District Health Officer, Karak/D.I.Khan
4. District Accounts Officer, Karak/D.I.Khan
5. Deputy Director (IT) Health Department.
6. Coordinator HSRU, Health Department.
8. PS to Secretary Health, Khyber Pakhtunkhwa.
9. Doctor concerned.

*(Signature)*  
**(Obaidullah)**

Section Officer (E-II)

*(Signature)*  
**Approved  
True Copy**

Copy of the Notification No: SO (H)E-II/4-1/2016 dated 4 July 2016 delivered to the website of health department: KPK only and not endorsed in hard copying to any office by the Office of the Secretary to Government of Khyber Pakhtun Khwa, Health Department Peshawar. 8



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

Dated Peshawar the 4<sup>th</sup> July-2016

**NOTIFICATION**

No.SO(H)E-II/4-1/2016. The Competent Authority is pleased to place the services of Dr. Aftab Ahmad Medical Officer (BS-17), Type-C Hospital Takhti Nasrati Karak at the disposal of District Health Officer, D.I. Khan on administrative grounds with immediate effect.

**SECRETARY HEALTH  
HEALTH DEPARTMENT**

**Endst of even No. and Date.**

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 3697-98/E.I (A-165) dated 04.07.2016.
3. District Health Officer, Karak/D.I.Khan
4. District Accounts Officer, Karak/D.I.Khan
5. Deputy Director (IT) Health Department.
6. Coordinator HSRU, Health Department.
8. PS to Secretary Health, Khyber Pakhtunkhwa.
9. Doctor concerned.

(Obaidullah)  
Section Officer (E-II)

From

**MOST IMMEDIATE**

Dated: 01.08.2016

Dr. Aftab Ahmed  
Medical Officer. Health Department: KPK.  
Karak.

**BY POST**

To

The Chief Secretary to Government of Khyber Pakhtun Khwa.  
Peshawar.

Accepted  
The Copy

PTO



**Subject: DEPARTMENTAL APPEAL FOR ILLEGAL AND UNLAWFUL RECOMMENDATIONS ESTABLISHED FOR TRANSFER OF DR.AFTAB AHMED, (MEDICAL OFFICER-BPS 17) FROM HOME DISTRICT KARAK TO D.I.KHAN ON ADMINISTRATIVE GROUNDS**

**Memo:**

Reference above notification it is submitted in the response;

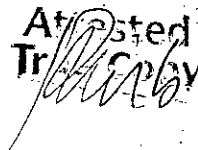
1. That the concerned **recommendations established** for the above quoted notification vide No: SO(H)E-II/4-I /2016 dated 4<sup>th</sup> JULY 2016 are **illegal, false, unlawful and not based on facts as baseless and fake reports has been delivered to the DGHS / Govt: of KPK through principle medical officer (PMO, Takhti Nasrati Karak namely Dr. Gulsanat shah and the then DHO Karak Dr. Rasul jan, having personal grudges with the undersigned and these two officials misguided DGHS/Govt:**
2. That neither any prior enquiry has been conducted in the matter before establishing above quoted notification nor has any hearing / written opportunity been given to the undersigned in the matter which is against the LAW and E&D rules 1973 of civil services. **The undersigned has the objection.**
3. That in the defense, time to time, the undersigned submitted written intimations even to the concerned inquiry officials in time. **(on - record )**
4. That if Health department KPK is still not satisfied then above quoted notification must be cancelled first and then proper inquiry to be conducted in the matter under E&D rules 1973 / existing LAW for their satisfaction, accordingly, please.
5. That the above notification in page 01 of this appeal was given to the website of health department KPK only and was not endorsed to any office in hard copy to be properly recorded by giving diary numbers for the official record purposes of the concerned offices and that is the reason that it also delayed the concerned proceedings to be adopted by all the concerned officials in the matter which is also not understandable in the matter. **( that can be inquired & verified).**
6. That on dated 14<sup>th</sup> July 2016 one namely **Mr. Muhtasib ullah** serving as Additional secretary Health, KPK visited such Type – C Hospital Takhyi Nasrati Karak at 01 pm and the undersigned was called to attend him. The undersigned met him in such hospital. **He neither introduced himself as an inquiry officer nor did he provide the statement of allegations (if any). He neither gave any show cause notice nor**

**Subject: DEPARTMENTAL APPEAL FOR ILLEGAL AND UNLAWFUL RECOMMENDATIONS ESTABLISHED FOR TRANSFER OF DR.AFTAB AHMED, (MEDICAL OFFICER-BPS 17) FROM HOME DISTRICT KARAK TO D.I.KHAN ON ADMINISTRATIVE GROUNDS**

**Memo:**

Reference above notification it is submitted in the response;

1. That the concerned **recommendations established** for the above quoted notification vide No: SO(H)E-II/4-I /2016 dated 4<sup>th</sup> JULY 2016 are **illegal, false, unlawful and not based on facts as baseless and fake reports has been delivered to the DGHS / Govt. of KPK through principle medical officer (PMO, Takhti Nasrati Karak namely Dr. Gulsanat shah and the then DHO Karak Dr. Rasul jan, having personal grudges with the undersigned and these two officials misguided DGHS/Govt:**
2. That neither any prior enquiry has been conducted in the matter before establishing above quoted notification nor has any hearing, / written opportunity been given to the undersigned in the matter which is against the LAW and E&D rules 1973 of civil services. **The undersigned has the objection.**
3. That in the defense, time to time, the undersigned submitted written intimations even to the concerned inquiry officials in time. **(on - record )**
4. That if Health department KPK is still not satisfied then above quoted notification must be cancelled first and then proper inquiry to be conducted in the matter under E&D rules1973 / existing LAW for their satisfaction, accordingly, please.
5. That the above notification in page 01 of this appeal was given to the website of health department KPK only and was not endorsed to any office in hard copy to be properly recorded by giving diary numbers for the official record purposes of the concerned offices and that is the reason that it also-delayed the concerned proceedings to be adopted by all the concerned officials in the matter which is also not understandable in the matter. **( that can be inquired & verified).**
6. That on dated 14<sup>th</sup> July 2016 one namely **Mr. Muhtasib ullah** serving as Additional secretary Health, KPK visited such Type - C Hospital Takhyi Nasrati Karak at 01 pm and the undersigned was called to attend him. The undersigned met him in such hospital. **He neither introduced himself as an inquiry officer nor did he provide the statement of allegations (if any). He neither gave any show cause notice nor**

Attested  
True Copy  


did he give any cross questions / hearing opportunity to the undersigned which is against inquiry procedure under the E&D Rules 1973 / LAW.

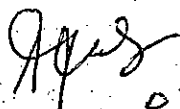
**The undersigned has the Objection on the said officer.**

**REQUEST.**

Reference above grounds and facts (on record) it is requested in this departmental appeal that the undersigned is innocent and falsely been victimized and is confident that has done nothing wrong (can be inquired) and the concerned culprits can be disclosed / exposed in the matter to be dealt under the law of civil services, accordingly, please. Therefore, the above notification of health department KPK Peshawar vide No: SO(H)E-II/4-1/2016 of dated may please be cancelled, accordingly, and then inquiry to be conducted in the matter.

Moreover, in case of non provision of justice, the undersigned will knock at the door of the honorable court of Service tribunal / civil courts in the matter (along with demanding all costs of damages from all concerned officials given to the undersigned both physically, mentally and economically, etc: in the matter), KPK, Peshawar.

Thanking you I remain

  
01/08/2016

Dr. Aftab Ahmed  
Medical officer,  
Health Department. Karak. KPK

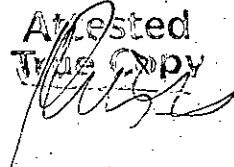
**Copy to:**

1. The Secretary to Govt of Khyber Pakhtunkhwa, Health deptt; Peshawar with the request to cancel the above notification for the provision of justice, accordingly.

ATTACHED  
True COPY  


2. The Director General, Health services, KPK, Peshawar with respect to their office letter No: 3697-98/E-I (A-165) of dated 04 July, 2016. Moreover, he is requested to put up this case to Secretary to Govt of Khyber Pakhtunkhwa, Health deptt; Peshawar to expedite the case for the provision of justice, accordingly, please.
3. The District health officer Karak for information in advance, please.
4. The Deputy commissioner Karak for information vide their directions to DHO Karak vide DHO letter No: 1814-18/Estb dated 01.07.2016. Moreover, he is requested to re-submit the inquiry report (established by Assistant commissioner) to the office of the Secretary Health, KPK, Peshawar to clarify the original picture of the above story.
5. The Assistant commissioner, Tehsil Takhti Nasrati, Karak Vide DHO Karak letter No: 1814-18 of dated 01.07.2016 for which the undersigned submitted proper written statement of dated 19.07.2016 ( on record ).
6. The principle medical officer, Incharge, Type C hospital Takhti Nasrati, Karak ( Dr. Gulsanat Shah ) for information vide their office letter No: 108/PF of dated 01/07/2016 provided to DHO Karaki ( having forged / overwriting annexure of complaint document in English in which your quarter changed the name of doctor on duty i.e. Dr. Irfanuddin in the bottom line of that complaint document rubbed by pen and name of Dr. Aftab was put above in the subject line and the timing quoted by complainant i.e. 07 pm were established by forging as 08. P.m. That such can be proved from original document of complainants and even by complainants belonging to Mohabati killa, karak ) which you submitted to DHO Karak ( copy enclosed in annexure A for all above officials, only ) and ultimately DGHS / Govt: were misguided by you and the then D.H.O. Dr. Rasul Jan karak for unlawful transfer of the undersigned.

It is terrible.

Attested  
True Copy  


7. Dr. Irfan uddin, medical officer(BPS -17), Type C Hospital, Takhti Nasrati for information vide his refusal on dated 30.06.2016 for conducting three postmortems at 07.25 pm in his evening shift duty hours i.e. 08am to 08 pm(as per duty roster – copy enclosed in Annexure--C ) in Type—C hospital Takhti Nasrati quoted by the complainant in his written complaint in Urdu quoted in lines 13-14 of dated 30.06.2016 (copy enclosed for all officials as above in Annexure --B) submitted to the said Assistant Commissioner for which the inquiry has been conducted by him in the matter (on record).

*sdt A*  
Dr. Aftab Ahmed

Medical officer (BPS-17)

Health department.

Karak (cell phone # 03468110578)

*01/08/16*

*Arrested*  
*T. A. Loby*

From:

Dr. Aftab Ahmed  
Medical officer (BPS\_17)  
Health department, KPK

Immediate

Dated: 19.10.2016

14

To

The chief Secretary to Govt of Khyber pakhtunkhwa  
Peshawar.

Reference: **DEPARTMENTAL APPEAL FOR ILLEGAL AND UNLAWFUL  
RECOMMENDATIONS ESTABLISHED FOR TRANSFER OF  
DR.AFTAB AHMED, (MEDICAL OFFICER-BPS 17) FROM HOM  
DISTRICT KARAK TO D.I.KHAN ON ADMINISTRATIVE  
GROUNDS**

Subject: **REMINDER**

Memo:

Above reference of dated 01.08.2016 has already been submitted to your good self and any kind of actions to be taken in the response has neither been communicated to the undersigned nor Secretary Health KPK Peshawar has given any response in the matter yet.

For such reference, if Secretary health, KPK, Peshawar is establishing any enquiry in the near future in the matter, it is added that:

1. That two paged report in Urdu of dated 30.06.2016 (on record) was actually submitted by the tehsildar (Mr. Sherqiyanus) Tehsil Takhti Nasrati and not by complainant in the matter. His cell phone number is 0345-666625. He must be called for the inquiry, if arranged in the near future.
2. The actual complainant in English (one paged—on record) in the matter was submitted by one namely Mr. Sajid umar, Karak having cell phone # 0335—9988745 must be called for the said enquiry, if arranged.

It is submitted for your information to clear the original picture of the above story which is on record.

*self. A7*  
Dr Aftab Ahmed (cell phone: 0346-8110578)

Copy to:- (even dated above)

✓ The Secretary to Govt of Khyber Pakhtun khwa Health Department Peshawar for necessary action please.

*Aftab 19/10/16*  
Dr Aftab Ahmed (cell phone: 0346-8110578)

Attested  
True copy

79

13

79

(E)

15

OFFICE OF THE PRINCIPAL MEDICAL OFFICER,  
INCINAGE TYPE-C HOSPITAL TAKHT E-NASRATI.

No. 108 /PE, dated 07/07/2016.

To: The District Health Officer,  
Karek.

Subject: REFUSAL FROM GOVT. DUTY.  
Sir,

I have the honour to inform your good office that on the consequences of all Medical Officers serving under control of this hospital duties were assigned to all concerned but on dated 30.06.2016. One Dr. Aftab Ahmad MO did not attend his duty nor the undersigned has been informed about his whereabouts.

In Mean while 03 injured person due to RTA namely Rehamatullah S/O Janat Gul, Zeenat Meenas D/O Janat Gul Neela D/O Janat Gul R/O Takht-e-Nasrati and 03 postmortum namely Barkatullah S/O Hamidullah, Samiullah S/O Hamidullah Rizwan Ullah S/O Hamidullah R/O Mohabati Killa were brought to the hospital. The Doctor on duty was not present. I personally contacted Dr. Aftab Ahmad MO but he does not attend the call. Then I gave him a message about the postmortum and insisted him to come to hospital as soon as possible to avoid the issue and law and order situation. But he does not reply. The public and the deceased relatives of the deceased exerted and they blocked the Main Indus highway from Peshawar to D.I. Khan. The honorable MPA and DHO (Health) called me to resolve the issue but he does not come to duty till 11.00PM. Then I done the Postmortum to resolve the issue. This is gross negligence on part of above named MO.

Sir,

It is therefore requested that the services of above named MO is not required to this hospital and placed at your disposal for posting anywhere in the district and necessary action may be initiated against him as he has taken law in his own hand.

Moreover he is creating problem to the administration the complaint of the deceased relative is hereby enclosed for ready reference.

Principal Medical Officer,  
I/C Type-c-Hospital Takht-e-Nasrati.

Approved  
Copy  
*[Signature]*





CERTIFICATE.

It is certified that Dr. Irfan-Un-Din is serving as a Medical Officer (BPS-17) in this Type-c-Hospital Takht-e-Nasrati from the last several years. It is further certified that he was assigned Govt: duties for the month June, 2016 in the routine quoted below: - (Timing is 8.00 AM to 8.00 PM).

<u>DAYS</u>	<u>DATE</u>
Wednesday	1.06.2016
Thursday	2.06.2016
Wednesday	8.06.2016
Thursday	9.06.2016
Wednesday	15.06.2016
Thursday	16.06.2016
Wednesday	22.06.2016
Thursday	23.06.2016
Wednesday	29.06.2016
<u>Thursday</u>	<u>30.06.2016</u>

*Sd*

Principal Medical Officer,  
I/C Type-c-Hospital Takht-e-Nasrati.

Np. 134 /D/R dated 19/07/2016

Copy to Dr. Aftab Ahmad Medical Officer, (BPS-17) w.r.t. his written application submitted to this office.

Principal Medical Officer,  
I/C Type-c-Hospital Takht-e-Nasrati.  
PRINCIPAL MEDICAL OFFICER  
I/C HOSPITAL  
TAKHT-E-NASRATI (KARAK)

Accessed  
True Copy

صباحی د

آج صبح 6/30 کو بوقت 6:45 بجے ہفت روزہ شریکوں کے پاس آئی۔

ماہینہ شکر و فخر صدائیکل اللہ بڑھائے ہوئے ہیں تین اشفاق تو ہم پر فوت ہوئے۔

عبداللہ صاحب نے بھرتی لیا۔ رحمت اللہ۔ رحمتوں اللہ۔ حمد اللہ کہ ان حمد اللہ سکھ

حقیقی علم فوت ہوئے۔ بعد میں رشتہ داروں۔ مہربانوں نے انہوں کو

انہوں کو لوزن یونیورسٹی مارٹن سڑک پر ہسپتال تخت لفری لے آئے۔

یہ لاشیں تو یہاں 7:25 صبح ہسپتال لے آئے۔ فوٹو ہسپتال میں

میں کوئی ڈاکٹر موجود نہ تھا۔ لوگوں نے M.S کل صحت شاہ گوجھا۔ تو

انہوں نے کہا کہ آج امیر صحتی میں ڈاکٹر آفتاب کی ڈیوٹی ہے۔ لیکن وہ ڈیوٹی

پر موجود نہ تھا۔ لوگوں نے احتیاج شروع کیا۔ اس دوران لوگوں نے

ڈوٹرا شین باڈے وک کو بلڈنگ لے گئے۔ اور انہیں لاشیں ہسپتال کے

ساحلے میں بازار تخت لفری صوبہ ڈکوڑہ لیا۔ اس دوران میں ہسپتال

آیا تو لبر اینٹیاں نہ تھیں۔ میں ڈاکٹر کل صحت شاہ کے کوئی اور وہ کو

میں موجود تھا۔ مہربانوں نے کہ میں عرفان الدین کو لیا ہے، میں خود

عرفان دین ڈاکٹر کے ہنگامہ لیا۔ مہربانوں نے انہیں لے کر لیا۔

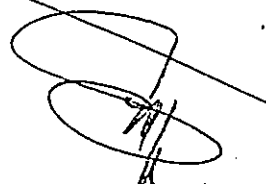
Attended  
by  
12/12/2024

میں دوبارہ عمل صحت سناہ صبا کے بعد رہا۔ تو وہ بند  
 تھا۔ میں نے کہا کہ آپ خود پوسٹ فارم کریں۔ تو اس  
 میں کچھ ملے اور  $\frac{10}{120}$  پوسٹ مارٹم شروع کیا۔

میں نے کہا:

اگر سینیٹل رینڈل میں خدایا کاروائی نہ کیے۔ تو لوگ دوبارہ  
 شروع کر دیں گے۔ اور پائے گا کو بند کریں گے۔ اور سناہ کو سناہ  
 عدالت کو بھی جائیں گے۔

بوقت  
 10:45

  
 30/6/2011

Best copy

To

(I)

20

The Medical Superintendent  
T.H.O Hospital, Takht-nasratti,  
Distt. Karak.

Subject: complaint against Emergency Doctor. (Dr. Aftab)

R/Sir, with respect it is stated that RTA took place on main High way which due to three young <sup>boys</sup> ~~men~~ died on the spot. We suddenly rushed to the T.H.O Hospital Takht-nasratti at 08:00 PM. But unfortunately we found no one doctor at emergency of the said Hospital while waiting for 3-hours.

Therefore, we, the family of deceased complaint that strict action must taken place against the said on Duty Doctor ~~Dr. Aftab~~.  
Thanks.

Date: 30/06/2016

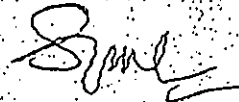
P.T.O.


*[Signature]*

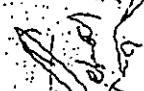
P.T.O.

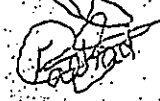
Your kind Affectionate

142037739302-3

Sajid Umar, 

Afsar Zaman, 

Rehman Wali, 

Farhadullah, 

پیر ایجنسی ہسپتال، صیقلی ہسپتال، آئی سی سی ہسپتال، تھریڈنگ ہسپتال (کھڑکی)

مناب عالی۔

مذکورہ ہے کہ مسائل کا سرٹیفکیٹ ڈاکٹر صاحب نے ریفر کیا ہے لہذا آپ صاحب سے التماس ہے کہ مسائل کو ایسیو لیس میں بیمار کو لے جانے کی  
طوری دی جائے نہایت مشکور ہوں گا

العارض

پ کا تالدار احمد علی گاؤں محلہ لبرک تحصیل تخت نصرتی ضلع کرک

جسکی چٹ نمبر 1752 تاریخ 06-06-2016 برائے KAW نمبر Albid

ارکس ڈاکٹر Refer to Khalifa  
General Hospital  
Bannu for mgmt.

دستخط ڈاکٹر 08-45 PM  
30/06/2016  
Dr. Albid  
Chro

لیسن نمبر A-1156

Signature

21/06/16

(K)

22

DISTRICT HEALTH OFFICER  
KARAK  
Phone & Fax No. 0927290537

OFFICE ORDER

On the direction of Deputy Commissioner Karak, Dr. Aftab Ahmad Medical Officer Type-C-Hospital Takhti Nasrati is transferred to RHC Shnawa Gudi Khel with immediate effect & the Assistant Commissioner Takhti Nasrati Karak is hereby nominated as inquiry officer to conduct inquiry of the incident at Type-C-Hospital Takhti Nasrati on 30/06/2016 (Night) against Dr. Aftab Ahmad Medical Officer who was absent from his duty while three injured persons & three dead bodies were brought to the Hospital. The inquiry officer is requested to submit inquiry report along-with his recommendations to the undersigned within a week time.

\*\*\*\*\*Sd\*\*\*\*\*  
DISTRICT HEALTH OFFICER  
KARAK

No. 1814-18 /Estb:

Dated. 01/07 /2016

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar for information please.
2. The Director General Health Services Khybr Pakhtunkhwa, Peshawar for information please.
3. The Deputy Commissioner Karak for information.
4. The Assistant Commissioner Takhti Nasrati Karak for information & necessary action.

The PMO I/C Type-C-Hospital Takhti Nasrati Karak for information w/r to his report No 108/PF dated.01/07/2016 & with the direction to relieve Dr. Aftab Ahmad Medical Officer immediately.

DISTRICT HEALTH OFFICER  
KARAK

Attested  
Copy  
*[Signature]*

*AK*  
*Call all concerned*  
*on 15/07/16*  
*[Signature]*  
*12/07/16*

*Visited Physically A/C Takhtenarsrati*  
*Office at 11:30 AM. Did meeting*  
*got such documents to submit statement*

*[Signature]*  
*18/7/16*  
*Dr. Aftab*  
*CMO. RHC*  
*Takhtenarsrati*



(L)  
23

**Copy of the office order No; 1814-18/Estb dated 01.07.2016(Forenoon) issued by the Office of the District health officer (Dr.Rasul Jan), Karak.**

**DISTRICT HEALTH OFFICER  
KARAK  
Phone & Fax No; 0927290537**

**OFFICE ORDER**

On the direction of Deputy Commissioner Karak, Dr. Aftab Ahmed medical officer Type \_C hospital Takhti Nasrati is transferred to RHC Shnawa Gudi Khel Karak with immediate effect & the assistant commissioner Takhti Nasrati is hereby nominated as inquiry officer to conduct inquiry of the incident at type C hospital Takhti Nasrati on 30.06 2016(Night )against Dr.Aftab Ahmed medical officer who was absent from the duty while three injured persons and three dead bodies were brought to the hospital. The inquiry officer is requested to submit inquiry report along with his recommendations to the undersigned within a week.

**Sdt  
DISTRICT HEALTH OFFICER  
KARAK**

No; 1814-18/Estb

Copy forwarded to;

1. The secretary to Govt of Khyber pakhtunkwa, Health department, Peshawar for information please.
2. The Director General health services Khyber Pakhtunkhwa Peshawar for information please.
3. The Deputy Commissioner Karak for information.
4. The Assistant commissioner Takhti Nasrati Karak for information and necessary action.
5. The PMO I/C Type C hospital Takhti Nasrati Karak for information with respect To his report No; 108/PF dated 01/07/2016 and with the direction to relieve Dr.Aftab Medical officer immediately.

**sdt  
DISTRICT HEALTH OFFICER  
KARAK**

To

Dated; 01.07.2016(Afternoon)

The District Health Officer, Karak.

**BY POST**

**Subject; ARRIVAL REPORT OF DR.AFTAB AHMED**

**Memo;**

Reference above, the undersigned hereby submits the ARRIVAL REPORT at RHC Shinawa Gudikheil (Shasalem) to join the station dated 01.07.2016 in the AFTERNOON.

*Aftab Ahmed 01/07/16*  
**DR.AFTAB AHMED**  
Medical officer, incharge  
RHC Shinawa Gudi Kheil, KARAK *o/c*

**Copy to;**

1. The Director General, Health Services, KPK, Peshawar for information reference above with the remarks that I am innocent and falsely been victimized (can be verified).

**Attested  
True Copy**  
*[Signature]*

- 2. The Deputy commissioner Karak for information quoted by DHO Karak, above, with the remarks that I am innocent and one namely Dr.Irfan uddin M.O. serving at that hospital was responsible for the above story as he was on official duty that evening can be verified from the 2 paged statement of the complainant(30.06.2016-in custody of Assistant commissioner, Tehsil Takht- e - Nasrati, Karak ) and from duty roster established by MO incharge. Moreover, the report submitted by MO incharge (Dr.Gul Sanat shah)vide No:108/PF dated 01/07/2016 submitted to DHO Karak is not based on facts. He is favoring the actual accused namely Dr. Irfanuddin.
- 3. The Assistant Commissioner, Tehsil Takhti Nasrati, Karak for necessary action and is welcome to conduct the said inquiry in the matter, accordingly, please.

*Aftab Ahmed* 01/07/16

DR.AFTAB AHMED

Medical officer,incharge

*o/c*

RHC Shinawa Gudi Kheil, KARAK

Attested  
*[Signature]*

M

25

Copy of the office order No; 1814-18/Estb dated 01.07.2016 issued by the Office of the District Health Officer, Karak

DISTRICT HEALTH OFFICER  
KARAK  
Phone & Fax No; 0927290537

OFFICE ORDER

On the direction of Deputy Commissioner Karak, Dr. Aftab Ahmed medical officer Type C hospital Takhti Nasrati is transferred to RHC Shnawa Gudi Khel, Karak with immediate effect & the assistant commissioner Takhti Nasrati is hereby nominated as inquiry officer to conduct inquiry of the incident at type C hospital takhti nasrati on 30.06 2016(Night) against Dr. Aftab Ahmed medical officer who was absent from the duty while three injured persons and three dead bodies were brought to the hospital. The inquiry officer is requested to submit inquiry report along with his recommendations to the undersigned within a week.

Sdt  
DISTRICT HEALTH OFFICER  
KARAK

No; 1814-18/Estb  
Copy forwarded to;

1. The secretary to Govt of Khyber pakhtunkwa, Health department, Peshawar for information please.
2. The Director General health services Khyber Pakhtunkhwa Peshawar for information please.
3. The Deputy Commissioner Karak for information.
4. The Assistant commissioner Takhti Nasrati Karak for information and necessary action.
5. The PMO I/C Type C hospital Takhti Nasrati Karak for information with respect to his report No; 108/PF dated 01/07/2016 and with the direction to relieve Dr. Aftab Medical officer immediately.

sdt  
DISTRICT HEALTH OFFICER  
KARAK

MOST IMMEDIATE

Dated; 19.07.2016  
BY Post

To  
The Inquiry officer.  
The Assistant Commissioner.  
Tehsil Takhti Nasrati, Karak.

Subject: STATEMENT OF DR. AFTAB AHMED Medical officer FOR INQUIRY FOR INCIDENCE QUOTED ABOVE BY DHO Karak (Dr. Rasul Jan), (PMO Dr. Gulsanat shah) and COMPLAINANT dated 30.06.2016 (7.25PM- On record)

Memo:

Reference above, it is stated:

1. That one, name not known may be official of your office, verbally informed the undersigned on dated 13.07.2016 that you Dr. Aftab Ahmed is here by informed to

Attested  
TYPE COPY  
*[Signature]*

attend the office of the Assistant commissioner at Takhti Nasrati in morning hours. Therefore, the undersigned attended your office on 18<sup>th</sup> July 2016 at 11.30 a.m. Your good self provided the hard copies of letter No; 1814-18/Estb dated 01/07/2016 duly bearing noted signatures of you (copy enclosed in annexure A) and one Urdu written complaint (02- paged) application of complainant (copy enclosed in annexure B).

2. That you demanded for submitting written statement in the matter with in few days. The undersigned agreed at spot. NOW,

**STATEMENT of the undersigned (Dr. AFATAB AHMED M.O.) for inquiry for the incidence on 30.06.2016 at 7.25 pm at TYPE-C HOSPITAL, TAKHTI NASRATI.KARAK, is quoted below:**

1. That as per Urdu written statement of the complainant in lines 06 and 07, the three dead bodies and injured were brought to Type C hospital Takhti Nasrati at 07.25p.m.(see annexure B) and at that time one namely Dr. Irfanuddin MO(BPS 17) was on official duty (08 am to 08 p.m.) that can be verified from the monthly duty roster established by Dr.Gul Sanat shah MO I/C (PMO) for the month of JUNE 2016 vide their office certificate No: 134/D/R dated 19/07/2016 (copy enclosed in annexure C).
2. That as per said Complaint written in Urdu, it is evident in line 13 that Dr. Gul sanat shah has directed Dr.Irfanuddin to conduct postmortems.
3. That as per said complaint written in Urdu, it is evident in line 14 that complainant went to the Govt; residence(located in hospital) of said Dr.Irfan uddin who refused for conducting such postmortems which renders him to be dealt under the E&D rules 1973/Law, accordingly.
4. That the undersigned was neither willfully absent from govt duties nor has done nothing wrong that night dated 30.06.2016.That night, the undersigned even managed injured and one was even referred to Khalifa Gul Nawaz hospital Bannu at 08.45 p.m. that can be verified from the referral letter issued to driver concerned for journey by Ambulance car (copy enclosed in annexure D).
5. That in the mid night that night (30.06.2016), undersigned even conducted one postmortem (on record).
6. That Dr Gul sanat shah (PMO)is giving false picture of the said story. The concerned enquiry officer (not introduced himself may be additional secretary) visited from Peshawar on dated 14.07.2016 at type C hospital Takhti Nasrati at 01 p.m. has neither recorded the concerned statement of said Dr. Irfanuddin nor he gave any hearing opportunity to the undersigned till this date which is also against the inquiry procedure. **THE UNDERSIGNED HAS THE OBJECTION.** The PMO is giving base less informations in his letter No; 108/PF dated 01/07/2016 submitted to DHO Karak.

**REQUEST:**

That reference above grounds and facts it is evident that the undersigned is innocent and falsely been victimized. It is requested that the undersigned civil services may please recommended to be deputed back to Type C hospital Takhti Nasrati, Karak.

It is submitted for approval, please.

Attested  
True Copy

Attested  
True Copy





*Aftab* 19/7/16  
 DR.AFTAB AHMED  
 Medical officer, RHC Shinawa Guddi Kheil(Shasalem)  
 Karak *o/c*

COPY TO: (even dated above with annexure A, B, C & D.)

1. The chief Secretary to govt; of Khyber Pakhtunkwa, Peshawar for information please.
2. The secretary, to government of Khyber pakhtun khwa, Health department Peshawar for necessary action vide their office notification No; SO(H)E-II/4-1/2016 dated 04.07.2016, (established on website of health deptt: KPK) accordingly, please. In case of non provision of justice, the undersigned will knock at the door of honorable court of service tribunal, KPK. Peshawar.
3. The Deputy commissioner Karak for necessary action, please.
4. The District Health officer, Karak for the reply of explanation vides their office order No: 1880-81 dated 01.07.2016 and is requested for further official action, please.

*Aftab* 19/7/16  
 DR.AFTAB AHMED  
 Medical officer,  
 RHC Shinawa Guddi Kheil(Shasalem)  
 Karak *o/c*

Attested  
*[Signature]*



  
 56555
   
 پشاور بار ایسوسی ایشن، خیبر پختونخواہ
   
 ایڈوکیٹ/ڈپٹی سیکریٹری
   
 بار کونسل ابار ایسوسی ایشن خیبر پختونخواہ
   
 رابطہ نمبر: 0345 910 9223

بعدالت جناب: سردار سید سید علی شاہ

<p>دعویٰ:</p> <p>مطلب:</p> <p>موضوع:</p> <p>جرم:</p> <p>تھانہ:</p>	<p>منجانب: مدعی</p> <p>دراکٹر سید علی شاہ</p> <p>پشاور بار ایسوسی ایشن</p>
--	--

### بابت تحریر آئکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کاروائی متعلقہ مقرر  
 ان مقام محکمہ احتساب کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وہ مکمل مقرر  
 راضی نامہ کرنے و تقریریں و فیصلہ برطن دینے جواب دعویٰ اقبال دعویٰ اور درخواست اڈھر قسم کی تصدیق  
 زریں بدستخط کرنے کا اختیار ہوگا، نیز یہ صورت عدم پیروی یا اور کسی اور طرفہ یا اعلیٰ کی برآمدگی اور منسوخی نیز  
 دائر کرنے اپیل نگرانی و پیروی کرنے کا اختیار ہوگا اور یہ صورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وہیں کیا اختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقاریر کا اختیار ہو گا اور صاحب  
 مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور ان کا ساتھ ہر داختم منظور قبول ہو گا دوران مقدمہ  
 میں جو فرچہ ہر جادہ اتوائے مقدمہ کے حساب سے ہو گا وہ مکمل موصوف و سول کرنے کا اختیار ہوگا کوئی تاریخ پیشی مقام  
 دورہ یا حد سے باہر ہو تو مکمل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 20-11-2016
   
 العودہ: \_\_\_\_\_
   
 الواف شدہ: \_\_\_\_\_
   
 مقام کے لئے منظور ہے۔

S. J. Farid  
 B.S. Farid