

FORM OF ORDER SHEET

and \_\_\_\_\_  
Appeal No. 401/2024

to be used for all other proceedings with signature of judge  
only.

3

15/03/2024

The appeal of Mr. Naveed Akhtar presented today by Mr. M. Asif Yousafzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 15-03-2024. Parcha Peshi is given to counsel for the appellant.

By the order of Chairman

  
REGISTRAR

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL NO. 401 /2024

Naveed Akhtar

V/S

D.G Health KP.

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*Naveed Akhtar*  
**APPELLANT**

THROUGH:

*M. Asif Yousafzai*  
**(M. ASIF YOUSAFZAI)**  
**ADVOCATE SUPREME COURT**  
**OF PAKISTAN.**

*Syed Noman Ali Bukhari*  
**(SYED NOMAN ALI BUKHARI),**  
**ADVOCATE HIGH COURT**

*Hilal Zubair*  
**&**  
**(HILAL ZUBAIR)**  
**ADVOCATE PESHAWAR.**

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL NO. 401 /2024

Naveed Akhter Driver  
Maternity Hospital Peshawar.

(APPELLANT)

VERSUS

1. The Director General Health Service , Khyber Pakhtunkhwa Peshawar.
2. The secretary to Govt; of KP Health deptt; Civil Secretariat Peshawar.

(RESPONDENTS)

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**APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED PREMATURE TRANSFER ORDER DATED 29.01.2024 AND ALSO AGAINST THE REJECTION ORDER DATED 28-02-2024 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.**

**PRAYER:**

**THAT ON THE ACCEPTANCE OF THIS APPEAL THE ORDER DATED 29.01.2024, 28.02.2024 MAY BE SET ASIDE, BEING PREMATURE AND AGAINST THE POST AND TRANSFER POLICY. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF THE APPELLANT.**

**RESPECTFULLY SHEWETH:**

**FACTS:-**

1. That the appellant is a respectable citizen of Pakistan and is serving in the Government of Khyber Pakhtunkhwa Health Department with the entire satisfaction of his superior without giving any chance of complaint to his superiors.
2. That appellant wrote an application dated 04-04-2023, wherein request to his high ups regarding to his posting from District Kohat to District Peshawar, the same was forwarded by to the District Health officer Kohat for further necessary action vide letter dated 11.05.2023. **Copy of application and letter dated 11.05.2023 are attached as Annex-A & B.**
3. That on 19.05.2023 the District Health Officer Kohat convey a letter to Director General Health Services Khyber Pakhtunkhwa, Peshawar regarding that the DHO Kohat has no objection if appellant was transferred to District Peshawar. **Copy of letter dated 19.05.2023 is attached as Annex-C.**
4. That No Objection Certificate was given by the Director General Drugs and Control & Pharmacy Services Khyber Pakhtunkhwa, Peshawar to adjust Mr. Naveed Ahmad against the vacant post of Driver. **Copy of the NOC is attached as Annex- D.**
5. That the appellant take no objection certificate from the Office of Medical Superintendent Govt: Maternity Hospital, Peshawar about his transfer against the vacant post of Driver vacated by Mr. Noor Raziq Driver. **Copy of the No Objection Certificate is attached as Annex- E.**
6. That the appellant was performing his duty on detailment basis vide order dated 31.10.2023 in Institute of Mental Health & Behavioural Sciences Hayatabad Phase-V Peshawar. **Copy of the office order dated 31.10.2023 is attached as Annex-F.**
7. That the appellant was transferred from DHO Kohat to Govt: Maternity Hospital Peshawar against the vacant post of Driver vide order dated 14.11.2023. **Copy of the order dated 14-11-2023 is attached as annex G.**

8. That the request of cancellation of transfer order of the appellant was made by Director Operation Ambulance Service to Director General Health Services, Khyber Pakhtunkhwa vide letter dated 7.11.2023. **Copy of the order dated 7.11.2023 is attached as Annex-H**
9. That in response to letter dated 7.11.2023 Director General Health Services vide order dated 29.01.2024 the transfer order dated 14.11.2023 was cancelled. **Copy of the order dated 29.01.2024 is attached as Annex-I.**
10. That the appellant feeling aggrieved from the cancellation order filed departmental appeal against the same on dated 31.01.2024 but the same was rejected on 28.02.2024 by incompetent authority without showing any reason which is the violation of Section-24A of General Clause Act. **Copy of the departmental appeal and rejection order are attached as Annex-J & K.**
11. That now the appellant comes to this august Tribunal for the redressal of his grievances on the following grounds amongst others.

**GROUND:**

- A) That the order dated 29.01.2024 & 28.02.2024 are against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That the appellant has been condemned unheard and has not been treated according to law and rules.
- C) That the rejection order is passed in violation of Section-24A of General Clause Act and also against the Judgment of the Superior Court 1991 SCMR-320.
- D) That the transfer order of the appellant was cancelled without showing any reason which is against the norms of the justice and on the same point Hon'able Tribunal allowed the appeal titled M.Miskeen VS Irrigation Deptt; so, the appellant also entitled to same relief.
- E) That the impugned cancellation is not passed in Public Interest which is the violation of clause I of the Posting transfer policy of provincial Government, it is pertinent to mention here that the posting Policy has same sanctity of law, this principle is also held by latest judgment of tribunal titled as Syed Ahsan Shah VS Education Department.

- F) That the impugned Cancellation order of the appellant has immensely affected the family life of the appellant. Being away from the wife and children not only affected the mental health of the appellant but also troubled the life of children who needs the immediate presence and help of their father in daily chores.
- G) That it is a known fact that father has vital role in nurturing, grooming and wellbeing of the children, but the impugned Cancellation order has made it hard for the appellant to play this important role and to perform his family responsibility.
- H) That the impugned cancellation order will affect the monthly expenditure of his family as their will be double expense on travel, food and other daily life needs.
- I) That serving in another district will bring gap between the life of the married couple and that also in the government service but posted at far away districts from each other postings.
- J) That not only the national laws and ruels but also the international conventions like Universal Declaration of Human Right and International Covenant on Civil and Political Rights urge the promotion and protection of family life in order to guarantee a happy life to family. And the impugned transfer is contravening to these conventions to which Pakistan is a signatory.
- K) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

*Naveed*  
**APPELLANT**

Naveed Akhtar

THROUGH:

*M. Asif*  
**(M. ASIF YOUSAFZAI)**  
**ADVOCATE SUPREME COURT**  
**OF PAKISTAN.**

*Syed Noman*  
**(SYED NOMAN ALI BUKHARI),**  
**ADVOCATE HIGH COURT**

&

*Hilal*  
**HILAL ZUBAIR**

**ADVOCATE PESHAWAR.**

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL NO. \_\_\_\_\_/2024

Naveed Akhtar

V/S

D.G Health KP.

**CERTIFICATE:**

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

*Naveed*  
DEPONENT

**LIT OF BOOKS:**

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.

*M. Asif*  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
OF PAKISTAN.

*Syed Noman*  
(SYED NOMAN ALI BUKHARI),  
ADVOCATE HIGH COURT

& *Hilal*  
(HILAL ZUBAIR)  
ADVOCATE PESHAWAR.

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO. \_\_\_\_\_/2024**

Naveed Akhtar

V/S

D.G Health KP.

**AFFIDAVIT**

I, Naveed Akhtar Driver Maternity Hospital Peshawar (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

*Naveed Akhtar*  
DEPONENT

Naveed Akhtar



A

7

بکھنور جناب ڈائریکٹر جنرل ہیلتھ سروسز صاحب خیبر پختونخواہ پشاور

مضمون:- درخواست برائے تبادلہ ضلع کوہاٹ سے ضلع پشاور

جناب عالی!

مودبانہ گزارش یہ ہے کہ سائل ڈسٹرکٹ ہیلتھ آفیسر ضلع کوہاٹ میں تقریباً 01-07-2015 سے بحیثیت ڈرائیور کی پوسٹ پر ڈیوٹی سرانجام دے رہا ہے اور ضلع پشاور کا رہنے والا ہے سائل ایک غریب اور بال بچے دار آدمی ہے اور والدین بوڑھے ہیں اُنکی دیکھ بھال کرنے والا اللہ کے اور میرے سوا کوئی نہیں ہے۔ سائل کی ساری تنخواہ کرایوں میں روزانہ پشاور سے کوہاٹ آنے جانے میں خرچ ہو جاتی ہے۔ اور گھر کے اخراجات بڑی مشکل سے ہوتے ہیں۔ سائل آپ سے التجا کرتا ہے کہ مجھے ضلع کوہاٹ سے ضلع پشاور تبدیل کرنے کا حکم صادر فرما کر میری پریشانی کو دور کر کے مشکور و ممنون فرمائیں۔ سائل آپ کو اور آپ کے بچوں کو تاحیات دعائیں دیتا رہے گا۔

شکریہ

العارض

آپ کا تالعداد  
No. 10662  
نوید اختر ڈرائیور

ڈسٹرکٹ ہیلتھ آفیسر کوہاٹ

مورخہ:- 04-04-2023

D. by Health  
D. No. 10662  
04/4/23

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



E-Mail Address: [nwfpdgc@yahoo.com](mailto:nwfpdgc@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230  
No. 3009 / Personnel Dated: 11/05/2023

B (2)

To,  
The District Health Officer  
Kohat.

Subject: **REQUEST FOR TRANSFER TO DISTRICT PESHAWAR**

Reference to the subject noted above and to state that Mr. Naveed Akhtar Driver attached to DHO Kohat has requested for his transfer to District Peshawar.

Please furnish your comments in this regard as well as intimate as to whether the above named Driver handed over to Rescue 1122 or otherwise with documentary proof.

*for*  
*9/5/2023*

**DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES, KP PESHAWAR**

*o/c*

*(09/05/2023)*



## DISTRICT HEALTH OFFICER, KOHAT

Ph & Fax#0922-514100

E.mail: [dhokohat@gmail.com](mailto:dhokohat@gmail.com)

KDA Gate No.2, District Secretariat, Kohat, KDA Complex, 1<sup>st</sup> Block, 3<sup>rd</sup> Floor.

No. 2136 /DHO/KTE-19

Dated 19 /05/2023

To:

The Director General, Health Services,  
Khyber Pakhtunkhwa, Peshawar.

Subject:

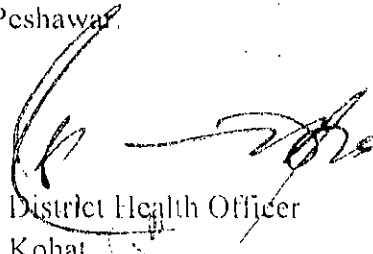
**REQUEST FOR TRANSFER TO DISTRICT PESHAWAR.**

R/Sir:

Reference your office letter No. 3009/Personnel, dated 11/05/2023, on the subject noted above.

I have the honour to state that Mr. Navced Akhtar, Driver is deputed to Rescue 1122 Kohat & drawing pay from Health Department, DHO Office, Kohat.

The undersigned has no objection, if he is transferred to District Peshawar.

  
District Health Officer  
Kohat



DIRECTORATE GENERAL DRUG CONTROL  
& PHARMACY SERVICES

No. \_\_\_\_\_ DGDCPS-2023  
Dated the Peshawar \_\_\_\_\_ / \_\_\_\_\_ / 2023

NO OBJECTION CERTIFICATE

D  
10

Certified that Directorate of Drug Control and Pharmacy Services has no objection to adjust Mr. Naveed Akhtar Driver DHO office Kohat against the vacant post of driver in Directorate Drug Control & Pharmacy Services Khyber Pakhtunkhwa, Peshawar.

DIRECTOR GENERAL / 09/10/2023  
Drugs Control & Pharmacy Services,  
Khyber Pakhtunkhwa Peshawar.



**OFFICE OF THE MEDICAL SUPERINTENDENT**  
**GOVT MATERNITY HOSPITAL PESHAWAR**

NO 543 /MHP.

Dated 01-11-2023

11

E

**NO OBJECTION CERTIFICATE**

Certified that Mr. Naveed Akhtar, Driver attached to District Health Office, Kohat may be transferred against the vacant post of Driver vacated by Mr. Noor Raziq Driver vide DGHS KPK Peshawar office order No. 5902-05/ Personnel dated: 18-10-2023.

*Waz*  
MEDICAL SUPERINTENDENT  
GOVT MATERNITY HOSPITAL,  
PESHAWAR.



**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services  
Peshawar and be sent to an officer of the name of the Directorate General Health Services  
Peshawar at the following address: P.O. Box 101, Peshawar - 25000. Fax: 091-9210239

No 18321-31/E.I.

Dated 31/10/2023

3  
[Signature]

F

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**OFFICE ORDER**

The following staff is hereby directed to perform their duties at Institute of Mental Health & Behavioral Sciences Hayatabad Phase-V Peshawar on deputation basis till further orders in the interest of public service with immediate effect.

Sl. #	Name of staff with designation	Present Place of posting.
1	Dr Qasim Riaz, Psychiatrist	Sarnad Hospital for Psychiatry diseases Peshawar
2	Dr Noor Alam Khan Khatt Radiologist	Services Hospital Peshawar
3	Dr Syed Abbas Ali Shah, Medical Officer	DHO Hospital Charsadda
4	Dr Ishaqullah Shah Medical Officer	DHO Hospital Charsadda
5	Dr Asif Hussain, Medical Officer	RHC Shawa District Swabi
6	Dr Abdul Hayee, Medical Officer	Government Naseerullah Khan Babar Memorial Hospital Peshawar
7	Dr Tajdar Alam Khan, Deputy Director (EPI)	DGHS Office Peshawar.
8	Dr Sana Khan D/O Khan Dahadar, WMO	Under transfer to DHO Peshawar
9	Mr Imroz Hussain, Superintendent	DG Drug Control & Pharmacy Peshawar.
10	Mr Amir Abdullah, Superintendent	DG Drug Control & Pharmacy Peshawar
11	Mst Shakila Begum, Head Nurse (BS-17)	Sarnad Hospital for Psychiatry diseases Peshawar.
12	Mst Shaheen Begum Head Nurse (BS-17)	Sarnad Hospital for Psychiatry diseases Peshawar.
13	Mst Naheed Sarwar, Head Nurse (BS-17)	Sarnad Hospital for Psychiatry diseases Peshawar.
14	Mst Ibrar Ud Din, RNO (BS-16)	Sarnad Hospital for Psychiatry diseases Peshawar

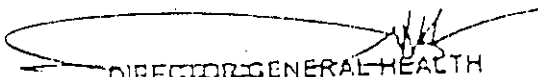
[Signature]

15	Mr Usman Khattak, CT Pharmacy	Sarnad Hospital for Psychiatry diseases Peshawar
16	Mr Kramullah CT Pharmacy	Sarnad Hospital for Psychiatry diseases Peshawar
17	Mr Jawad, CT Pharmacy	Sarnad Hospital for Psychiatry diseases Peshawar.
18	Mr Bilal, Computer Operator	Services Hospital Peshawar.
19	Mr Fahad Rose, Sr Clerk	DG Drug Control & Pharmacy Peshawar.
20	Mr Sameer Ul Asar, Jr Clerk	DHO Office Dir Lower
21	Mr Abdul Samad, Chowkidar	National Program Merged Area
22	Mr Naveed Akhtar, Driver	DHO Office Kohat
23	Mr Inamullah, N/O	Planning Cell, Merged Area
24	Mr Waqas, Ward Orderly	Sitwat Ghayur Shaheed Hosp. Peshawar
25	Mr Syed Ahmed Shah Ward Orderly	Sitwat Ghayur Shaheed Hosp. Peshawar
26	Mr Shabir Ahmed, Lab	Sitwat Ghayur Shaheed Hosp. Peshawar
27	Mr Arshad Masih Sweeper	Integrated Health Project KP Peshawar
28	Mr Shahzad, Sweeper	DG Drug Control & Pharmacy Peshawar.
29	Mr Nadeem Rafiq, Sweeper	Relieved from LRH (Waiting for posting)
30	Mr Waqas, Ward Orderly	Moulvi Ameer Shah Memorial Hosp Pesh
31	Mr Atazaz, Ward Orderly	Moulvi Ameer Shah Memorial Hosp. Pesh
32	Mr Tariq Qureshi, Lab Attendant	Moulvi Ameer Shah Memorial Hosp Pesh
33	Mr Mansoorullah, Ward Orderly	Government Naseerullah Khan Babar Memorial Hospital Peshawar
34	Mr Haroon Ur Rashid, Ward Orderly	Government Naseerullah Khan Babar Memorial Hospital Peshawar
35	Mr Abdul Jali, Ward Orderly	Government Naseerullah Khan Babar Memorial Hospital Peshawar
36	Mr S Zaher Abbas Ali Shah, Chowkidar	Government Naseerullah Khan Babar Memorial Hospital Peshawar
37	Mr Salman Khalid, Ward Orderly	Government Naseerullah Khan Babar Memorial Hospital Peshawar
38	Mr Zeeshan, Ward Orderly	DHO Office Peshawar

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14

39	Mr Farhan, Behistia	DHO Office Peshawar
40	Mr Jehanzeb, N/Q	DG Drug Control & Pharmacy Peshawar.
41	Mr. Amirullah, N/Q	DG Drug Control & Pharmacy Peshawar.

  
DIRECTOR GENERAL HEALTH  
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

- Cc
- 01 Incharge Institute of Mental Health & Behavioral Sciences Hayatabad Pesh
  - 02 Project Director, IHP, KP Peshawar
  - 03 Director General, Drug Control & Pharmacy Peshawar
  - 02 Medical Superintendent, SHPD, Peshawar.
  - 03 Medical Superintendent, Services Hospital Peshawar.
  - 04 Medical Superintendent, NKBM Hospital Peshawar.
  - 05 Medical Superintendent, Sifwat Ghayur Memorial Hospital Peshawar.
  - 06 Medical Superintendent, MASM Hospital Peshawar
  - 06 District Health Officer, Swabi
  - 07 District Health Officer, Kohat ✓
  - 08 District Health Officer, Peshawar
  - 08 Medical Superintendent, DHOH Charsadda
  - 09 PS to Secretary Health Department Khyber Pakhtunkhwa
  - 10 PA to Director General Health Services, Peshawar



For information and necessary action

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# DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: [gw/pdghs@yahoo.com](mailto:gw/pdghs@yahoo.com) Office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

## OFFICE ORDER

As approved by the competent authority, Mr. Naveed Akhtar Driver attached to DHO Kohat is hereby transferred and posted to Govt. Maternity Hospital Peshawar against the vacant post of Driver in the interest of public service with immediate effect.

Sd/xxxxxxx

DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

Dated 14/11/2023

No 6543-47 /Personnel

Copy forwarded to the:-

1. A.G Khyber Pakhtunkhwa.
2. DHO Kohat w/r to his letter No. 2136/DHO?KT/E-19 dated 19.05.2023.
3. M.S Govt. Maternity Hospital Peshawar w/r to his NOC No. 543/MHP dated 01.11.2023.
4. DAO Kohat.
5. Official Concerned.

For information and necessary action.

  
DIRECTOR GENERAL HEALTH  
SERVICES, KHYBER PAKHTUNKHWA PESHAWAR.

13/11



# 16

**DIRECTORATE GENERAL  
EMERGENCY RESCUE SERVICE (RESCUE - 1122)**  
Government of Khyber Pakhtunkhwa



No.2/Dir(O-AS)/Disp-23/374-78

Dated Peshawar, the 07 November, 2023

To

The Director General,  
Health Services, Khyber Pakhtunkhwa:

Subject: **TRANSFER ORDER.**

Refer to office order No.18321-31/E.I Dated: 31.10.2023 regarding the subject cited above.

I am directed to state, that in pursuance of the Provincial Cabinet decision and subsequent notification by Health Department; all the ambulances under the jurisdiction of Health Deptt. along with drivers has been handed over to ERS (Rescue-1122), Khyber Pakhtunkhwa. Rescue-1122 Inter-Hospital / Referral Ambulance Service (IHRAS) is currently operational in Khyber Pakhtunkhwa.

I am further directed to inform your good self with grave concern, that **Mr. Naveed Akhtar – Driver IHRAS District Kohat** has been ordered to report for duty at DHO Office Kohat. The IHRAS is under the administrative control of Rescue-1122 and such unwanted actions are hindering the essential services of Rescue-1122.

Keeping the foregoing in view, it is therefore, requested that the subject order in respect of **Mr. Naveed Akhtar – Driver IHRAS District Kohat** may please be **withdrawn**. Your cooperation in this regard will be highly appreciated.

**DIRECTOR OPERATIONS  
AMBULANCE SERVICE**

Endst: No.2/Dir(O-AS)/Disp-23/374-78

Dated: 07-11-2023

Copy forwarded for information to: -

- 1- Director (Admin), ERS (Rescue-1122), Khyber Pakhtunkhwa.
- 2- District Emergency Officer, ERS (Rescue-1122), Kohat.
- 3- PS to Secretary Health, Government of Khyber Pakhtunkhwa.
- 4- PS to Secretary, RR&S Deptt., Government of Khyber Pakhtunkhwa.
- 5- PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa.
- 6- Personal file of the official concerned.
- 7- Office file.

**DIRECTOR OPERATIONS  
AMBULANCE SERVICE**



# DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: [dgshs@yahoo.com](mailto:dgshs@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

## OFFICE ORDER

The posting/ transfer order in respect of Mr. Naveed Akhtar Driver issued vide this Directorate office order bearing Endst: No. 6543-47/Personnel dated 14.11.2023 is hereby cancelled.

Sd/XXXXXXXXXX

DIRECTOR GENERAL HEALTH  
SERVICES, K.P, PESHAWAR.

Dated 23/11/2024.

No. 1071-38 /Personnel

Copy forwarded to the:-

1. A.G Khyber Pakhtunkhwa.
2. Director Operations Ambulance Service Directorate General (E) Rescue 1122 Services KP Peshawar w/r to his letter No. 3-2/Dir(O-AS)/Disp-23/374-78 dated 07.11.2023.
3. District Health Officer Kohat.
4. M.S Govt. Maternity Hospital Peshawar.
5. Official Concerned.

For information and necessary action.

DY: DIRECTOR (ADMN)  
DIRECTORATE GENERAL HEALTH  
SERVICES, K.P PESHAWAR.

24-11-2024

I  
17

جناب عالی، طہ جنرل سید محمد رفیق خیر پور صاحب، نئی نواح پشاور

سچون: اپریل  
جناب عالی

18

موردہ لکڑاٹس میں لے کر سائیل کوئیڈ اکثر ڈر اور ڈر سے 9 سال  
مور فر 2015-07-01 سے ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لے کر لیا گیا  
ڈر اور ڈر کی پوسٹ پر کام کر رہا ہے۔

سائیل میں بالکل پتے در آ رہے ہیں۔ اور سائیل کے والین بہت سخت  
بیماریوں میں مبتلا ہیں۔ والدہ صاحبہ دل کی بیماری، سہو ہزار  
کئی بلڈ پریشر کی سریفنڈ ہے۔ اور والد صاحب کے سین لبر سے پھر آپریشن  
ہوئے ہیں۔ یہ نیا کا آپریشن ہے۔ پروٹیسٹ کا آپریشن اور ڈر ڈر  
انٹھوں کی بھی آپریشن ہوا ہے۔ اور کافی بہت زیادہ تکلیف ہے۔ اور بیماریوں میں  
مبتلا ہیں۔ اور سائیل کی بیوی بھی یہ وقت بیوی نکول سے 9 سال سے  
خا اور ڈر سے 3 وجہ سے پریشانی میں رہتے ہیں ہمارے بھی یہ کہہ رہے ہیں۔

جناب عالی (3) سائیل کا والدین اور بیوی نکول کا دیوہ والا کرنے اللہ کے اور فیہ سے سوا کوئی  
نہیں ہے۔

جناب عالی (4) سائیل کا تبادلہ ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے 47-65  
میرٹل مور فر 2023-11-14 کے مطابق ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے  
ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے 47-65

اور فوراً ہی سائیل کو دوبارہ ڈسٹرکٹ ہیڈ کوارٹرز آفس (IHRAS) میں لے کر آئے گا  
ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے 47-65  
آر ڈر سے 47-65 مور فر 2024-01-29 کو فیہ لکڑاٹس اور ڈر سے 47-65

جناب عالی (5) سائیل آپ سے لکڑاٹس لے کر ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے 47-65  
(IHRAS) کو کوئی دوسرا ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے 47-65

نیشنل (cancel) مگر ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے 47-65  
ڈسٹرکٹ ہیڈ کوارٹرز آفس میں لکڑاٹس اور ڈر سے 47-65  
اور بیوی کو ایک مگر 27 پر لکڑاٹس اور ڈر سے 47-65

3486 PR  
37/11/24

PTC

19

کے طور پر جناب ڈائریکٹر جنرل سٹریٹجی اور اسٹریٹجک امور  
درخواست نمبر ایس ایچ ایس ڈی/24

4234  
12/2

تاریخ

ضامی - 5

موربانہ لیزر اس ڈیویژن - سائل نوید احمد در ایڈمنسٹریشن  
سٹریٹجی ڈیویژن سے ڈائریکٹر جنرل سٹریٹجی اور اسٹریٹجک امور  
آڈیٹ کے مطابق گورنمنٹ سٹریٹجی سائل نوید احمد کو ایس ایچ ایس ڈی/24  
654347/1  
14-11-2023

DG. He  
آڈیٹ کے مطابق گورنمنٹ سٹریٹجی سائل نوید احمد کو ایس ایچ ایس ڈی/24

کے مطابق دربارہ سٹریٹجی ڈیویژن

آپ سے رٹورن کیا گیا ہے۔ کہ سائل کو ایس ایچ ایس ڈی/24 کا جواب

کا حکم صادر کیا گیا ہے۔

سٹریٹجی ڈیویژن

کے

آپ کے لیکچرر  
نوید احمد در ایڈمنسٹریشن  
گورنمنٹ سٹریٹجی سائل نوید احمد

صفحہ 24-02-12

20

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



F-Mail Address: [myfpcghs@yahoo.com](mailto:myfpcghs@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

No. 1609 /Personnel

Dated: 28/2 /2024

To,

Mr. Naveed Akhtar Driver  
Under transfer from Govt. Maternity Hospital Peshawar.

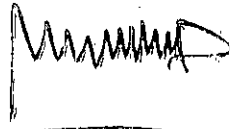

Subject:

**APPLICATION FOR CANCELLATION OF ORDER**

Memo

Reference to your application dated 12.02.2024 on the subject noted above.

It is to inform you that you have to perform duty in Rescue 1122 Khyber Pakhtunkhwa as per cabinet decision.

  
  
**DY: DIRECTOR (ADMN)**  
DIRECTORATE GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

VAKALAT NAMA

NO. \_\_\_\_\_/2023

IN THE COURT OF Kp Service Tribunal Peshawar

Naveed Akhtar

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Health Deptt - KP

(Respondent)  
(Defendant)

I/We, Naveed Akhtar

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court of Pakistan & Syed Noman Ali Bukhari, Advocate High Court & Hilal Zubair Advocate** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

Dated \_\_\_\_\_/2023

Naveed

(CLIENT)

ACCEPTED

M. Asif  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT,  
OF PAKISTAN.  
(BC No. 10-7327)

S. Noman  
(S. NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT,

Hilal  
&  
HILAL ZUBAIR  
Advocate

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
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0333-9103240  
0306-5109438  
0310-9503909