

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL No 1777/2023

Mst. Nazia Gul W/O Syed Amir
Mehmood.....(Appellant)

VERSUS

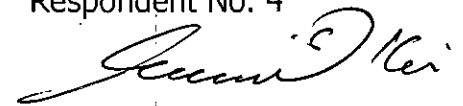
GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHERS (Respondents)

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Through

Respondent No. 4



ZARTAJ ANWAR

ASC

21-03-2024

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL No 1777/2023

Mst. Nazia Gul W/O Syed Amir Mehmood, Ex-Head Nurse (Civil Servant), MTI-KTH,
Peshawar (Appellant)

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHERS (Respondents)

**Khyber Pakhtunkhwa
Service Tribunal**
Diary No. 11855
Dated 21/3/24

COMMENTS OF BEHALF OF RESPONDENTS No. 4

Respectfully Sheweth:

The answering respondent earnestly seeks permission to submit as under;

Preliminary Objections and Submissions:

- A. That at the very outset, it is respectfully submitted that this Honorable Court has no jurisdiction to entertain the instant appeal as the appellant is neither an aggrieved person nor has locus standi.
- B. That the instant appeal is neither maintainable nor actionable since it is bereft of any and all cause of action because it is based on misconceived, distorted and vague assertions which are nowhere near to facts.
- C. That the instant case is liable to be dismissed being frivolous, vexatious and flimsy.
- D. That the appellant has come to this court with sullied hands.
- E. That the appellant does not fall under the definition of aggrieved persons having no cause of action.
- F. That the instant appeal is bad for misjoinder and non-joinder of necessary parties.

-2-

G. That the instant appeal is barred by law in its present form.

H. That the appellant on hand is violating the law while on the other has approached this Honorable Tribunal with Malafide, distorted, misleading and untrue facts. Thus, the appeal is liable to be dismissed.

I. That all allegations in this instant case are denied unless specifically admitted.

PARA-WISE REPLY:

1. Paragraph numbered 1 pertains to record. The brief of service record of the appellant is that she was appointed in this institution as charge nurse BPS-14 (Institutional employee) vide notification No. 106-12/KTH/E dated 04.01.2005, and the appellant has submitted her arrival report on 14.01.2005, later she was appointed as Charge Nurse in BPS-16 by the Directorate of Health Service Khyber Pakhtunkhwa vide Office Order No. 7369-868/ E. II dated Pesh. the 24-07-2014.

(Copies of initial appointment, arrival report and Office Order No. 3769-868/E. II dated Pesh. The 24-07-2014 are attached as annexure A, A1 & A/2 respectively)

2. Paragraph numbered 2 pertains to record. However, the appellant is put to strict proof.

3. Paragraph numbered 3 is not related to the answering respondent No. 4.

4. Paragraph numbered 4 is correct to the extent of transfer of appellant from Police Services Hospital Peshawar to Khyber Teaching Hospital Peshawar vide notification No. SOH-III/3-5/2016 dated 08.08.2016, whereas the appellant has submitted her arrival report dated 09.08.2016.

(Copy of posting order and arrival report is attached as annexure B & B1 respectively)

5. Paragraph numbered 5 is correct to the extent that the appellant, being civil servant, was transfer from Khyber teaching hospital to government maternity hospital as nursing superintendent BPS-18 by Government of KPK vide notification No. SOH-III/3-5/2022 dated 23.09.2022 by Health Department Khyber Pakhtunkhwa. Whereas, the MTI-Khyber Teaching Hospital duly endorsed the said notification of health department KP vide letter No. 2041/KTH/HRD dated 07.10.2022, whereby the appellant was relieved from his duties in MTI-KTH with

immediate effect. It is pertinent to mention here that the appellant submitted her departure report on 01-11-2022.

(Copy of transfer order dated 23-09-2022, reliving order dated 07-10-2022 and departure report dated 01-11-2022 are attached as annexure C, C1 & C/2 respectively)

- 6. Paragraph numbered 6 is incorrect, misleading and against the actual facts hence denied. The appellant was relieved vide letter No. 2041/KTH/HRD dated 07.10.2022 to her parent department, but against the norms of administration and settle principles, the appellant is reluctant to make clearance which is important for Last Pay Certificate (LPC).

It is pertinent to mention here that the appellant was occupying a residential accommodation of MTI-Khyber Teaching Hospital, Peshawar, against which outstanding amount is pending for her in shape of utility bills and rent etc. Furthermore, the appellant has been intimated several times via notices but the appellant being adamant turned a deaf ear to it.

Even more shockingly, the appellant did not vacate the residential accommodation rather hand over possession to another Health Department employee without fulfilling the codal formalities and informing the administration.

The appellant does not fall within the definition of aggrieved person; thus the appeal is liable to be dismissed on this score alone.

(Copy of reliving order and notices are attached as annexure D, D1 & D2 respectively)

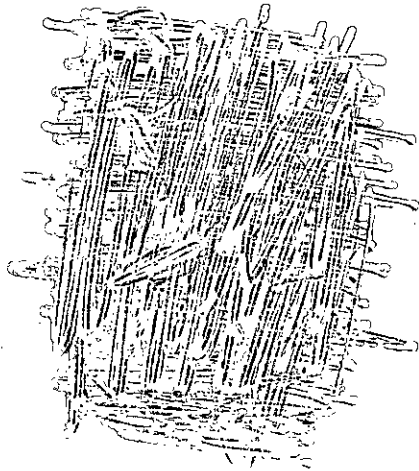
GROUND:

- a. Ground a is distorted and against the actual facts hence denied. The appellant herself is violator of law, rules and principles and has not come to this Honorable Tribunal with clean hand. She is trying to cover her illegal acts by abusing the process of Court. She, being defaulter of outstanding amount & possession of residential accommodation, is liable to be punished under law.
- b. Ground b pertains to record. However, it of paramount importance to mention her that the she is reluctant to pay the outstanding dues/amount and also adamant to hand over the possession of residential accommodation which further speaks volume pertaining performing duties to entire satisfaction of superior.
- c. Ground c is distorted and bent out of the context hence, denied. The appellant salaries were stopped in a due course of law as the appellant is relived form KTH, and also is defaulter of outstanding dues for her accommodation.

- d. Ground d warrants no reply. However, the pay of appellant is stopped in due course of law.
- e. Ground e is untrue, false and against the actual facts hence, denied. The Ground has already been addressed in preceding paras.
- f. Ground f is misleading the petitioner has no legal standing whatsoever. However, the answering respondent with prior permission of this honorable Court may assist with any other ground at the time of arguments.

It is, therefore, most respectfully and humbly prayed that appeal of the appellant may graciously be dismissed in favor of the answering Respondent with costs.

Any other relief which this honorable court deems just and appropriate may also be granted to the answering defendants.



Through

Asmat Pasha
RESPONDENTS No 4

Zartaj Anwar
Zartaj Anwar

Advocate Supreme Court of Pakistan

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.1777/2023

Mst. Nazia Gul.....**Appellant**

VERSUS

Govt. of KPK & others.....**Respondents**

AFFIDAVIT

I, Asmat Pasha, Director Nursing, Nursing-KTH, MTI, Khyber Teaching Hospital, do hereby solemnly affirm and declare that the contents of the accompanying **Comments** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court. *It is further stated that the answering respondent have been neither placed ex-parte nor their defence has been struck off/cast.*



Asmat Pasha

DEPONENT
CNIC No.15302-0860780-3

A 6

Office of the Chief Executive
KTH/KMC/KC, Peshawar.
No. _____/KTH/E
Dated. 4-1- /2005

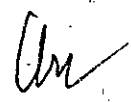
NOTIFICATION

In exercise of the powers vested vide Govt. of NWFP, Health Department notification No.SOH(II)3-15/2001 dated 26/6/2001 (NWFP Medical Institution rules 2001) Rule 9, sub 2 para(ii) the competent authority is pleased to appoint Miss Nazia Bibi D/o Said Wali as Charge Nurse in (BPS-14) against the vacant post of charge Nurse in this institution with immediate effect.

Her services will be governed by the terms and condition laid down in the contract policy 2002 notified by the Govt. of NWFP Finance Department vide No.FD/SOSR-II)12-1/2002 dated 26/10/2002 (as amended from time to time) shall be applicable to her.


She will be on probation for a period of one year. The Chief Nursing Superintendent will fully observe her performance and submit monthly progress report regularly to the undersigned.

She is directed to execute contract agreement on stamp paper.


Chief Executive
Khyber Teaching Hospital/
KMC/KC, Peshawar.

No. 106-12 /KTH/E.
Copy to:-

1. Director General Health Services NWFP Peshawar.
2. The Medical Superintendent, KTH Peshawar.
3. The Director Finance, KTH/KMC/KCD, Peshawar.
4. The Chief Nursing Superintendent, KTH, Peshawar.
5. Accounts Officer, KTH Peshawar.
6. The Audit Officer, KTH, Peshawar.
7. Miss. Nazia Bibi D/o Said Wali, C/O Gul Naz, C/Nurse KTH, Peshawar.


Chief Executive
Khyber Teaching Hospital/
KMC/KC, Peshawar.

ATTESTED

A-17

The Chief Nursing Superintendent
Khyber Teaching Hospital
Peshawar

Subject: - Arrival date - 14-01-05

Respected Madam,

Most respected, It is stated that I am appointed here (KTH) Peshawar as a charge nurse BPS 14 on contract base. Now I want to join duty under your kind supervision.

It is, therefore, requested you to give me

(Encl-06) a chance
- Thanks

Forwarded to M.S
for information and
necessary action
please. Her appointment
letter is attached
here with.

Encl
2) 14.1.2005

Yours Obediently

Miss - Nazia Gw

D/O Said Wali

Date - 14-01-05

No. 55/2005

14/1/05

ATTESTED



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 Phn 091-9210269
Exchange 091-9210187, 9210188

OFFICE ORDER

On the recommendation of Khyber Pakhtunkhwa Public Service Commission, the following Nurses are hereby appointed as Charge Nurses BPS-16 @ Rs. 10,000-800-34,000, plus usual allowances as admissible under the rules, on regular basis and posted against the vacant post in the Hospitals mentioned against their names with immediate effect :-

S.No.	Name with Father's Name	Place of Posting.	Remarks
01	Nazia Gul D/O Said Wali	KTH Peshawar ✓	Against the vacant post ✓
02	Rashida Bibi D/O Niyat Nadir Khan	HMC Peshawar	Against the vacant post
03	Busmen D/O Ziaullah	HMC Mardan	Against the vacant post
04	Saba Jehan Zeb D/O Jehan Zeb	Govt. LRH Peshawar	Against the vacant post
05	Nazreen Bibi D/O Syed Musa	HMC Peshawar	Against the vacant post
06	Farzana Gul D/O Gul Zamin	Govt. LRH Peshawar	Against the vacant post
07	Sheeraz Begum D/O Nawab Khan	DHC Hospital, Charsadda	Against the vacant post
08	Nazish Baber D/O Baber	HMC Peshawar	Against the vacant post
09	Shumaila D/O Naseer Khan	Govt. LRH Peshawar	Against the vacant post
10	Misla D/O Falak Naz	Govt. LRH Peshawar	Against the vacant post
11	Raheela Bibi D/O Shah Jehan	Govt. LRH Peshawar	Against the vacant post
12	Reena D/O Shoukat Masih	CH Mattani (Peshawar)	Against the vacant post
13	Shagufta D/O Abdul Hameed	HMC Peshawar	Against the vacant post
14	Nazrana Bibi D/O Abdur Razaq	Govt. LRH Peshawar	Against the vacant post

was paid for 1 mgs. now selected by PSB

h/1/2017

① Rakwana Tabeen charge
② Ikram and ③ Jamila have been transferred to other posts and thus ④ posts are vacant

ATTESTED

forward to Mr. Sattar
Jalil
CNS
7/8/16
DF

16

15	Sara Gulzar Ahmad D/O Gulzar Ahmad	HMC Peshawar	Against the vacant post
16	Nayab Nisar D/O Nisar Ahmad Khan	IKD Peshawar	Against the vacant post
17	Rehana D/O Ismail	HMC Peshawar	Against the vacant post
18	Kalsoom Bibi D/O Waris Khan	HMC Peshawar	Against the vacant post
19	Nazia Bibi D/O Jehangir Khan	Govt. LRH Peshawar	Against the vacant post
20	Hafiza Musilma D/O Mohammad Nazir	KTH Peshawar ✓	Against the vacant post ✓
21	Tamanna Begum D/O Jaffar Khan	THQH (Charsadda) Shabqadar	Against the vacant post
22	Nizhat Naz D/O Zahir Shah	DHQ Nowsheera Hospital,	Against the vacant post
23	Alia Tabbassum D/O Abdul Ghani	DHQ Hospital, Mardan	Against the vacant post
24	Gulmeena D/O Shamshad Ali	DHQ Hospital, Charsadda	Against the vacant post
25	Rozeena Gul D/O Alif Gul	Govt. LRH Peshawar	Against the vacant post
26	Anjum D/O Abdul Latif	Govt. LRH Peshawar	Against the vacant post
27	Madina Bibi D/O Sherjahan Khan	Govt. LRH Peshawar	Against the vacant post
28	Samina Bibi D/O Ghulam Mohammad	MMC Mardan	Against the vacant post
29	Bus Jehan D/O Hadif Gul	MMC Mardan	Against the vacant post
30	Farzana Hanif D/O Daniel	KTH Peshawar ✓	Against the vacant post ✓
31	Saima Gul D/O Nazir Gul	Govt. LRH Peshawar	Against the vacant post
32	Naseem Akhtar D/O Misal Khan	DHQ Hospital, Mardan	Against the vacant post
33	Rishman Begum D/O Hamidullah	HMC Peshawar	Against the vacant post
34	Margaret Rasheed D/O Rasheed Masih	HMC Peshawar	Against the vacant post
35	Zul Haj D/O Wali Khan	Govt. LRH Peshawar	Against the vacant post
36	Nizakat Bibi D/O Sher Zaman Khan	HMC Peshawar	Against the vacant post
37	Hadiqa Hanif Khan D/O	DHQ Hospital,	Against the

was working as trust employee and selected by PSE

11/14/17

ATTESTED

38	Ruby D/O Gulzar Ali		HMC Peshawar	Against the vacant post
39	Shehla Samreen D/O Nisar Mohammad		MMC Mardan	Against the vacant post
40	Zohra Bibi D/O Abdul Rashid		MMC Mardan	Against the vacant post
41	Rahana Bibi D/O Manzoor Ellahi		Govt. LRH Peshawar	Against the vacant post
42	Nosheen D/O Shahid		HMC Peshawar	Against the vacant post
43	Bibi Fatima D/O Mohammad Pervaz		HMC Peshawar	Against the vacant post
44	Nousheen Saba D/O Imdadullah Khan		Govt. LRH Peshawar	Against the vacant post
45	Noreen D/O Murad Ali		HMC Peshawar	Against the vacant post
46	Riffat Shaheen D/O Abdul Hafeez		DHQ Hospital, Mardan	Against the vacant post
47	Farah Jamal D/O Jamal Shah		Govt. LRH Peshawar	Against the vacant post
48	Amna Bismillah Jan D/O Bismillah Jan		THQ Hospital, Shabqadar (Charsadda)	Against the vacant post
49	Haleema Akhtar D/O Akhtar Munir		LRH Peshawar	Against the vacant post
50	Geetika Begum D/O SherDoust Khan		Govt. LRH Peshawar	Against the vacant post
51	Farzana Tawab D/O Tawab Khan		MMC Mardan	Against the vacant post
52	Kubra Amin D/O Mohammad Amin		Govt. LRH Peshawar	Against the vacant post
53	Riasat Begum D/O Saltanat Khan		MMC Mardan	Against the vacant post
54	Hurmat D/O Zahir Shah		MMC Mardan	Against the vacant post
55	Nargis D/O Mohammad Zubair		HMC Peshawar	Against the vacant post
56	Aneeta Majeed D/O Majeed Masih		HMC Peshawar	Against the vacant post
57	Nousheen D/O Raheem Khan		Govt. LRH Peshawar	Against the vacant post
58	Nosheen D/O Ghulam Farid		Govt. LRH Peshawar	Against the vacant post
59	Nagina Bibi D/O MirzaNagin Shah		Govt. LRH Peshawar	Against the vacant post
60	Saima Shaheen D/O Ghulam Ahmad		Govt. LRH Peshawar	Against the vacant post

10

22

ATTESTED

61	Naseem D/O Baramosh		HMC Peshawar	Against the vacant post
62	Bus Gul D/O Attaullah		Govt. LRH Peshawar	Against the vacant post
63	Bushra D/O Bakhtiar-ud-Din		Govt. LRH Peshawar	Against the vacant post
64	Honey Yousaf D/O Yousaf Batthi		HMC Peshawar	Against the vacant post
65	Shaonam Muneer D/O Muneer Khan		DHQ Hospital, Mardan	Against the vacant post
66	Janatan D/O Mohammad Ismail		HMC Peshawar	Against the vacant post
67	Saima Bibi D/O Muskeen Khan		Govt. LRH Peshawar	Against the vacant post
68	Sibi Maryam D/O Khan Sher		HMC Swabi	Against the vacant post
69	Samia D/O Gharib Shah		HMC Peshawar	Against the vacant post
70	Ghazala Siddiq D/O Mohammad Siddiq		MMC Mardan	Against the vacant post
71	Humaira D/O Ghulam Farid		HMC Peshawar	Against the vacant post
72	Fatima Bibi D/O Faqir Mohammad		Govt. LRH Peshawar	Against the vacant post
73	Nusrat Bibi D/O Ajab Khan		MMC Mardan	Against the vacant post
74	Iram Shama D/O Abdu Rahman		Govt. LRH Peshawar	Against the vacant post
75	Nadia Rehmat D/O Rehmat		HMC Peshawar	Against the vacant post
76	Safia D/O Mohammad Zareen		Govt. LRH Peshawar	Against the vacant post
77	Gul Naz D/O Sher Akbar		Govt. LRH Peshawar	Against the vacant post
78	Robi Parveen D/O Mohammad Anwar		KTH Peshawar ✓	Against the vacant post ✓
79	Najma Amin D/O Noor-ul-Amin		Govt. LRH Peshawar	Against the vacant post
80	Dilnaz Begum D/O Saib Bacha		Govt. LRH Peshawar	Against the vacant post ✓
81	Karashma Anwar D/O Saleh Jan		Govt. LRH Peshawar	Against the vacant post

ATTESTED

Their appointment in the Health Department Govt. of Khyber Pakhtunkhwa will be subject to the following terms and conditions:-

- 01. They will be on probation initially for a period of one year extendable for a further period not exceeding one year.
- 02. Their Services can be dispensed with during the probation period, if their work and conduct found unsatisfactory.
- 03. Their appointment will be subject to medical fitness and verification of character and antecedents, Educational qualification etc by the respective Medical Supdt./ District Health Officer from the concerned Board/Faculty etc.
- 04. They will not be entitled to any TA/DA for medical examination and joining their first place of appointment.
- 05. They will be governed by such Rules and orders as may be issued by the Government from time to time for the category of Government Servants to which they belong.
- 06. They are liable to be posted/served any where in Khyber Pakhtunkhwa/FATA.
- 07. They will complete normal tenure at their places of 1st posting as per Government rules.
- 08. They will submit an 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.
- 09. If they wish to resign from Service, they will resign in writing by giving prior notice of one month OR deposit one month pay in lieu of one month's advance notice, in the Government treasury. However they will continue to serve the Government till their resignation is accepted by the competent authority.

If the above terms and conditions are acceptable to them, they should submit arrival report in the institutions mentioned against their names for duty within (14) days of the issuance of this order.

Sd/-
DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR.

No. 3769-868/E.II, Dated Pesh. The 24 / 07 /2014.

Copy forwarded to the:-

- 01. Secretary to Govt. of Khyber Pakhtunkhwa Health Department, Peshawar.
- 02. Secretary Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 03. Medical Superintendent Govt. LRH Peshawar.
- 04. Medical Superintendent KTH Peshawar.

ATTESTED

[Signature]

[Handwritten initials]

- 05. Medical Superintendent HMC Peshawar.
- 06. Director JKD Hayatabad Peshawar.
- 07. Medical Superintendent MMC Mardan.
- 08. Medical Superintendent DHQ Hospital, Mardan.
- 09. Medical Superintendent DHQ Hospital, Charsadda.
- 10. Medical Superintendent DHQ Hospital, Nowshera.
- 11. Medical Superintendent Bacha Khan Medical Complex, Swabi.
- 12. District Health Officer, Peshawar.
- 13. District Health Officer, Charsadda.
- 14. AG Khyber Pakhtunkhwa Peshawar.
- 15. District Accounts Officers, Mardan, Nowshera, Charsadda, and Swabi
- 16. DA-concerned, DGHS office Peshawar.
- 17. Charge Nurse concerned.

For information and necessary action.

DIRECTOR GENERAL HEALTH SERVICES KPK PESHAWAR

[Handwritten signature]
23/7/14

[Handwritten signature]
23/7/14

[Handwritten signature]



B 14
GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 03rd August, 2016

NOTIFICATION

No. SOH-III/3-5/2016. In pursuance of partial notification of this department notification No. SOH-III/3-5/2014 dated 14-07-2016 the Competent Authority is pleased to order the following posting / transfer with immediate effect in the public interest.

S.NO	Name	From	To	Remarks
1.	Lubna Sheikh (Head Nurse) BS-17 D/O Sheikh Muhammad Ahsan	Under transfer to Govt ID Children Hospital Peshawar.	Khyber Teaching Hospital, Peshawar.	Against the vacant post.
2.	Nazia Gul (Head Nurse) BS-17 D/o Said Wali	Under transfer to Police Services Hospital, Peshawar.	Khyber Teaching Hospital, Peshawar.	Against the vacant post.

3. They will be on probation for a period of one year extendable for another one year in terms of rule -15 of APT Rules 1989.
4. Their services will be governed under Khyber Pakhtunkhwa Civil Servants Act 1973s amended vide Civil Servants (Amendment) Act 2005 and rules made there under and other relevant laws and rules.
5. They are directed to assume charge within 30 days after the issuance of this notification failing which their appointment shall be treated as cancelled.

SECRETARY HEALTH

Endst: even No & date.

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General Health Services, Khyber Pakhtunkhwa Peshawar.
3. The Hospital Director, MTI, KTH, Peshawar.
4. The Director, Provincial Health Services Academy, Peshawar.
5. PS to Secretary Health, Khyber Pakhtunkhwa.
6. The Deputy Director (I.T) -Health, Khyber Pakhtunkhwa.
7. Charge Nurse concerned.

[Signature]
ATTESTED

[Signature]
(Muhammad Tariq)
SECTION OFFICER-III

GOVERNMENT OF KHYBER PAKHTUNKWA PESHAWRA

CERTIFICATE OF TRANSFER OF CHARGE

Certified that I, Nazia Gul To Gul Wali

Have this day before noon taken over charge of the office after relinquished

With reference to the Order of the K.P.K Government

No. SO4-II/3-5/2016 Dated 8th August 2016 20

transferring Ms. Arriwal as a Head Nurse in BPS-17

To

2. Particulars of Cash and important/Secret/Confidential documents handed over/taken over are noted on the revers.

Signature of relieved Government Servant

Designation

Station

KTH/MTI Peshawar

Signature of Government Servant receiving charge in KTH/MTI Nazia

Destination Head Nurse

Dated 9/8/2016 20

Endst. No. 16627-3 From 16906-091E

Dated 9/8/2016 20 12-8-16

Forwarded to Hospital Director

To

The Accountant-General, K.P.K, Peshawar.

N.s. [Signature]

09, 8/16

- 2.
3.
4.
5.

The charge of the office of

was transferred from Mr.

to Mr.

on the fore noon of the 20 after

Signature Designation HOSPITAL DIRECTOR Medical Teaching Institution KTH Peshawar

10/8/16



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar, the 23rd September, 2022

NOTIFICATION

SOH-III/3-5/2022 (Nursing Staff BS-18): Consequent upon their promotion as Nursing Staff (BS-18) on regular basis, notified vide this Department's Notification of even number dated 04-08-2022, the Competent Authority is pleased to order transfer/posting of the following Nursing Staff (BS-18) with immediate effect, in the public interest:-

S. No	Name of officer with father name.	From	To	Remarks
1.	Sabira Sultana D/O Mohammad Nawaz Khan	Nursing Instructor (BS-17) Public Health School DI Khan	Vice Principal (BS-18) Public Health School DI Khan	Against the vacant post
2.	Sharafat D/O Amir Zarin	Head Nurse BS-17 SGTH Swat	Nursing Supdt: BS-18 Mian Gul Abdul Haq Jehanzab Kidney Hospital, Swat	Against the vacant post
3.	Shamoon Farhan S/O Saraj Bhatti	Head Nurse BS-17 MolviAmeer Shah Memorial Hospital, Peshawar	Senior Head Nurse BS-18 Sarhad Hospital for Psychiatric Diseases Peshawar.	Against the vacant post
4.	Awal Khan S/O HabibMian,	Nursing Supdt: BS-17 HMC Peshawar	Nursing Supdt: BS-18 Sifat Ghayur Shaheed Memorial Hospital Peshawar	Against the vacant post
5.	Saeeda Kausar D/O Farid Khan,	Head Nurse BS-17 King Abdullah Teaching Hospital, Mansehra	Nursing Supdt: BS-18 King Abdullah Teaching Hospital Mansehra	Against the vacant post
6.	Sabeen Akhtar D/O Pir Bakhsh	Head Nurse BS-17BBS Teaching Hospital, Abbottabad	Nursing Supdt: BS-18 BBS Teaching Hospital, Abbottabad	Against the vacant post
7.	Iffat Aisha D/O AkhtarMunir	Nursing Instructor BS-17 Govt. College of Nursing HMC Peshawar	Nursing Tutor BS-18 Govt. College of Nursing, Mardan	Against the vacant post
8.	Nargis D/O Habib-ur- Rehman	Nursing Instructor BS-17 Govt. College of Nursing HMC Peshawar	Senior Head Nurse BS- 18 Govt. Naseerullah Khan Baber Memorial Hospital Peshawar (Retired from service w.e from 14.07.2022	Against the vacant post
9.	Bushra Begum D/O FazleElahi	Nursing Instructor BS-17 Govt. College of Nursing KTH Peshawar	Senior Head Nurse BS- 18 MolviAmeer Shah Memorial Hospital Peshawar (Retired from service w.e from 30.07.2022	Against the vacant post
10.	Wasima Rafique D/O S.M. Rafique	Assistant Director Nursing BS-17 DGHS office Peshawar	Chief Nursing Superintendent BS-18 at Molvi Ameer Shah Memorial	Against the vacant post

ATTESTED

	Kausar Parveen D/O Allah Detta	Head Nurse BS-17 LRH Peshawar	Senior Head Nurse/Nurse Manager BS-18 Sarhad Hospital for Psychiatric Diseases, Peshawar	Against the vacant post
	Azram Bibi D/O Abdul Hayee	Head Nurse BS-17BBS Teaching Hospital, Abbottabad	Senior Head Nurse BS-18 BBS Teaching Hospital, Abbottabad	Against the vacant post
15.	Fahmida Sultana D/O Azad Khan	Head Nurse BS-17 Women & Children Hospital, Bannu	Nursing Supdt: BS-18 Type-D Hospital Kakki Bannu	Against the vacant post
16.	Anjum Naheed D/O M. Inayatullah	Head Nurse BS-17 DHQ Hospital, Bannu	Nursing Supdt: BS-18 Type-D Hospital Panyala DI Khan for one day actualization and then be posted as Deputy Director Administration in DHQ Hospital, Bannu.	Against the vacant post
17.	Nasreen D/O Fazal Ali	Head Nurse BS-17 THQ Hospital, Tangi (Charsadda)	Nursing Supdt: BS-18 THQ Hospital Tangi Charsadda	Against the vacant post
18.	Wakela Begum D/O Aslam Khan	Head Nurse BS-17 BBS Teaching Hospital, Abbottabad	Senior Head Nurse/Nurse Manager BS-18 BBS Teaching Hospital Abbottabad	Against the vacant post
19.	Sharifa Bibi D/O Muhammad Ramzan	Head Nurse BS-17 DHQ Hospital, DIKhan	Nursing Supdt: BS-18 Type-D Hospital Paharpur DI Khan	Against the vacant post
20.	Parveen Nishan D/O Nishan Masih,	Head Nurse BS-17 KTH Peshawar.	Senior Head Nurse/Nurse Manager BS-18 Govt. Naseerullah Khan Babar Memorial Hospital Peshawar	Against the vacant post
21.	Zubaida Begum D/O Noor-ul- Basar	Head Nurse BS-17 KTH Peshawar	Senior Head Nurse/Nurse Manager BS-18 Sarhad Hospital for Psychiatric Diseases, Peshawar	Against the vacant post
2.	Noor Jehan D/O Sanobar	Head Nurse BS-17 DHQ Hospital, Timergara	Nursing Supdt: BS-18 DHQ Hospital Timergara	Against the vacant post
3.	Bibi Saeeda D/O Muhammad Sadiq	Head Nurse BS-17 King Abdullah Teaching Hospital, Mansehra	Nursing Supdt: BS-18 DHQ Hospital Battagram	Against the vacant post
4.	Naeema Bibi D/O Mohsin Ali Shah	Head Nurse BS-17 DHQ Hospital, DIKhan	Nursing Supdt. BS-18 DHQ Hospital, Karak	Against the vacant post
5.	Tauheed Begum D/O Muzaffar Shah	Head Nurse BS-17 Services Hospital, Peshawar	Senior Head Nurse/Nurse Manager BS-18 Services Hospital Peshawar	Against the vacant post
6.	Fauzia Mushtaq D/O Mushtaq	Head Nurse BS-17 Moivi Ameer Shah Memorial Hospital, Peshawar	Senior Head Nurse/Nurse Manager BS-18 Govt. Maternity Hospital Peshawar	Against the vacant post
7.	Deeba D/O	Head Nurse BS-17 Govt	Senior Head Nurse	Against the vacant post

ATTESTED

30.	Caroline Anwar D/O Anwar	Head Nurse BS-17 HMC Peshawar	Senior Head Nurse/Nurse Manager BS-18 Govt. Naseerullah Khan Babar Memorial Hospital Peshawar	Against the vacant post
31.	Lubna Sheikh D/O Sheikh Muhammad Ihsan	Head Nurse BS-17 College of Nursing KTH Peshawar	Vice Principal BS-18 Govt. College of Nursing, KTH, Peshawar	Against the vacant post
32.	Shakila Karim D/O Abdul Karim	Assistant Director Nursing BS-17 DGHS Office Peshawar	Deputy Director Nursing BS-18 DGHS Office Peshawar	Against the vacant post
33.	Nusrat Begum D/O Fazli Rabi	Nursing Instructor BS-17 C of N Swat	Principal BS-18 Govt. C of N Swat	Against the vacant post
34.	Yasmin Begum D/O Inayat-ur- Rehman	Nursing Instructor BS-17 Govt. College of Nursing KTH Peshawar	Nursing Supdt: BS-18 Molvi Ameer Shah Memorial Hospital Peshawar	Against the vacant post
35.	Nazia Shaheen D/O Muhammad Salman	Nursing Instructor BS-17 College of Nursing ATH Abbottabad	Principal BS-18 College of Nursing ATH Abbottabad	Vice Sr. No. 56
36.	Gulshan Bibi D/O Sher Khan	Assistant Controller BS- 17, Nursing Examination Board (NEU) KP Peshawar	Deputy Quality Control Nurse BS-18 at Services Hospital, Peshawar	Against the vacant post
37.	Nazia Gul D/O Said Wali	Head Nurse BS-17 KTH Peshawar	Nursing Supdt: BS-18 Women & Children Hospital Rajjar Charsadda.	Against the vacant post
38.	Bushra Munir D/O Syed Munir Shah	Nursing Instructor BS-17 Govt. C of N Bannu	Nursing Tutor BS-18 Govt. C of N Bannu	Against the vacant post
39.	Bibi Kalsoom D/O Zakir Hussain	Head Nurse BS-17 DHQ Hospital, Landikotal	Senior Specialist Nurse (BS-18) Services Hospital, Peshawar	Against the vacant post
40.	Akhtar Begum D/O Amir Lal	Head Nurse BS-17 Sifwat Ghayyur Shaheed Memorial Hospital Peshawar	Specialist Nurse BS-18 Sifwat Ghayyur Shaheed Memorial Hospital Peshawar	Against the vacant post
41.	Fauzia D/O Muhammad Ilyas	Head Nurse BS-17 Govt. Naseerullah Khan Babar memorial Hospital, Peshawar	Senior Head Nurse/Nurse Manager BS-18 Govt. Naseerullah Khan Babar memorial Hospital, Peshawar (Retired from service w.e.from 14.07.2022)	Against the vacant post
42.	Margarret Mahi D/O Mahi Masih	Nursing Instructor BS-17 Govt. College of Nursing KTH Peshawar	Nursing Supdt: BS-18 Services Hospital Peshawar	Against the vacant post
43.	Khalida Latif D/O Mohammad Latif	Head Nurse BS-17 DHQ Hospital, Haripur	Nursing Supdt: BS-18 DHQ Hospital, Haripur	Against the vacant post
44.	Musarrat Latif D/O Latif Batti	Head Nurse BS-17 Women & Children Hospital Rajjar Charsadda	Senior Head Nurse/Nurse Manager BS-18 Sarhad Hospital for Psychiatric Diseases, Peshawar	Against the vacant post
45.	Saeeda Bano D/O Saif ur Rehman	Head Nurse BS-17 DHQ Hospital, Mardan	Nursing Supdt: BS-18 DHQ Hospital, Mardan	Against the vacant post
46.	Rukhsana Noor D/O Noor Muhammad	Nursing Instructor BS-17 Govt. College of Nursing KTH	Nursing Supdt. BS-18 Govt. Maternity Hospital Peshawar	Against the vacant post

ATTESTED

48.	Razia Sultana D/O Jan Baz	Head Nurse BS-17 Mian Rasheed Husain Shaheed Memorial Hospital, Pabbi (Nowshera)	Nursing Supdt: BS-18 Mian Rasheed Husain Shaheed Memorial Hospital, Pabbi (Nowshera)	Against the vacant post
49.	Salma Bibi D/O Abdul Rashid	Nursing Instructor BS-17 Public Health School Nishtarabad Peshawar	Senior Head Nurse/Nurse Manager BS-18 BS-18 Molvi Ameer Shah Memorial Hospital Peshawar	Against the vacant post
50.	Tahira Naz D/O Rahim Dad	Head Nurse BS-17 LRH Peshawar	Nursing Supdt: BS-18 DHQ Hospital Charsadda	Against the vacant post
51.	Neelam Pari D/O Nadar Khan	Head Nurse BS-17 HMC Peshawar	Senior Head Nurse/Nurse Manager BS-18 Govt. Naseerullah Khan Babar Memorial Hospital Peshawar	Against the vacant post
52.	Shahana Noor D/O Noor Muhammad	Nursing Instructor BS-17 Govt. College of Nursing HMC Peshawar	Vice Principal BS-18 Govt. College of Nursing, HMC, Peshawar	Against the vacant post
53.	Rukhsana Shaheed D/O Ghulam Rasool	Head Nurse BS-17 Women & Children Hospital, Kohat	Nursing Supdt: BS-18 Women & Children Hospital, Kohat	Against the vacant post
54.	Tahira Shereen D/O Faiz Masih	Head Nurse BS-17 Govt. Maternity Hospital, Peshawar	Senior Head Nurse/Nurse Manager BS-18 Govt. Govt. Nasser ullah Khan Babar Memorial Hospital Peshawar	Against the vacant post

Adjustment

55.	Sahar Hibi D/O Mir Abbas	Nursing Tutor BS-18 Govt. College of Nursing Bannu	Vice Principal BS-18 Govt. College of Nursing Bannu	Against the vacant post
56.	Bibi Asma D/O Aurangzeb	Principal, BS-18 Govt. College of Nursing ATH Abbottabad	At the disposal of Director General PHSA KP Peshawar for further posting	Against the vacant post
57.	Zeenat Bibi	Vice Principal, BS-18 Govt. College of Nursing, KTH, Peshawar.	Senior Clinical Nursing Instructor BS-18, Sifat Ghayyur Shaheed Memorial Hospital, Peshawar	Vice Sr. No. 04

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Enlist of even No and Date.

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Director General, Provincial Health Services, Khyber Pakhtunkhwa, Peshawar.
4. District Health Officer concerned

A an
ATTESTED



MEDICAL TEACHING INSTITUTION
KHYBER TEACHING HOSPITAL, PESHAWAR
Office of the Hospital Director

C1

20

Endst: No: 2041 /KTH/HRD Dated: 07/10/2022

Copy for information to:-

1. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
2. Director Finance, MTI KTH, Peshawar.
3. Nursing Director, MTI KTH, Peshawar.
4. Secretary BOG, MTI KTH/KMC/KCD, Peshawar.
5. HRMIS Section, MTI KTH, Peshawar.
6. Payroll Section MTI KTH, Peshawar.
7. Ms. Parveen Nishan D/O Nishan Masih Head Nurse BPS-17.
8. Ms. Zubaida Begum D/O Noor ul Basar Head Nurse BPS-17.
9. Ms. Mukhtiar Begum D/O Mohib Gul Head Nurse BPS-17.
10. Ms. Nazia Gul D/O Said Wali Head Nurse BPS-17.

Note:

The above mentioned Head Nurses are hereby stand relived from their duties in this institution with immediate effect. They are directed to report for duty at their new place of posting immediately.

Hospital Director, MTI
Khyber Teaching Hospital
Peshawar.

ATTESTED

C.MIC = 17/01-1044314-2

C-2

GOVERNMENT OF KHYBER PAKHTUNKWA PESHAWRA

CERTIFICATE OF TRANSFER OF CHARGE

Certified that I, NAZIA GUL DIO SAID WALI

Have this day before noon taken over charge of the office MTE-KTH Peshawar
after relinquished

With reference to the Order of the K.P.K Government

No. SOH-TU/3-5/2022 Dated 1st November 2022

transferring Mr

To Govt Maternity Hospital Peshawar

2. Particulars of Cash and important/Secret/Confidential documents handed over/taken over are noted on the revers.

Signature of relieved Government Servant Naz

Designation Head NWS

Station,

Signature of Government Servant receiving charge

Dated..... 20

Destination.....

Endst. No. 2939/HRD

Dated 24/11 2022

From

To

1. The Accountant-General, K.P.K, Peshawar.

- 2. Hospital Director
- 3. Director Finance
- 4. HR Manager
- 5. Concern Officer

Manager HR

HOSPITAL DIRECTOR
Medical Teaching Institution
KTH, KMC, KCD,
Peshawar

F.I.D No 7758
Date: 20-11-22
K.T.H Peshawar

Abd Khan

The charge of the office of BPS - 17

was transferred from Mr

to Mr NAZIA GUL DIO SAID WALI

on the fore noon of the 1st November 2022
after

Signature Qash

NURSING DIRECTOR
KTH Peshawar
Designation



MEDICAL TEACHING INSTITUTION
KHYBER TEACHING HOSPITAL, PESHAWAR
Office of the Hospital Director

D 22

Endst: No. 2041 /KTH/HRD

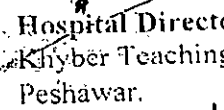
Dated 07/10/2022

Copy for information to:-

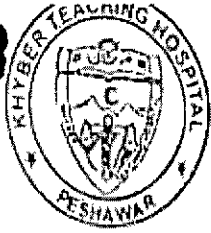
1. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
2. Director Finance, MTI KTH, Peshawar.
3. Nursing Director, MTI KTH, Peshawar.
4. Secretary BOG, MTI KTH/KMC/KCD, Peshawar.
5. HRMIS Section, MTI KTH, Peshawar.
6. Payroll Section MTI KTH, Peshawar.
7. Ms. Parveen Nishan D/O Nishan Masih Head Nurse BPS-17.
8. Ms. Zubaida Begum D/O Noor ul Basar Head Nurse EPS-17.
9. Ms. Mukhtiar Begum D/O Mohib Gul Head Nurse BPS-17.
10. ~~Ms. Nazia Gul D/O Said Wali Head Nurse BPS-17.~~

Note:

The above mentioned Head Nurses are hereby stand relived from their duties in this institution with immediate effect. They are directed to report for duty at their new place of posting immediately.


Hospital Director, MTI
Khyber Teaching Hospital
Peshawar.


ATTESTED



D1
23

**MEDICAL TEACHING INSTITUTION
KHYBER TEACHING HOSPITAL, PESHAWAR
OFFICE OF THE MANAGER ACCOMMODATION**

No. 3662 /KTH/MA

Dated: 21/12/2022

To

Ms. Nazia Gul D/O Said Wali Khan
Head Nurse
MTI KTH Peshawar

Subject: VACATION NOTICE

Memo:

Reference to the subject cited above, I am directed to address you;

That You were serving in MTI-KTH Peshawar in the capacity of Charge Nurse.

That You were provided accommodation inside the hospital in **Extra Flat 1 New Student Hostel** MTI-KTH Peshawar.

Where as You were transferred from MTI-KTH Peshawar vide Notification of Government of khyber pakhtunkhwa SOH III/3-5/2022 Dated 23rd Sep 2022.

That as per MTI KTH Peshawar Accommodation rules No. 10 you were given Grace period for more than 02 Months for retention of the said residence and you are required to vacate your occupied residence subject to the provision of paying the Flat rent and other utility charges and report to this office.

That as per MTI KTH Peshawar Accommodation rules you have been given sufficient time for your stay and after your transfer the stipulated time for retention of flat has also expired.

Where as you failed to vacate your occupied residence beyond the stipulated period, which is contrary to the residential Act rule No 26 (3) which can lead to heavy penalty.

Where as Nursing staff of MTI-KTH are facing accommodation problems and have waited since long

But you are not cooperating in this regard and failed to vacate your occupied residence till date due to which nursing staff of MTI-KTH is also suffering.

Now therefore, with the approval of the competent authority this vacation notice is issued upon you under the provision of MTI KTH Peshawar Accommodation rules 2015, that you Ms. Nazia Gul D/O Said Wali Khan resident of Ex-Flat 1 New Student Hostel MTI KTH Peshawar is hereby directed to vacate the subject residence within 07 days of the issuance of this notice failing which your occupied residence shall be vacated by the Hospital administration as per rules/law.

In execution of the vacation administration shall bear no responsibility of any damage/loss to the luggage.

21/12/22
Manager Accommodation
MTI-KTH Peshawar

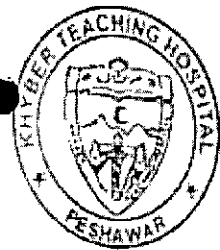
No. 3662 /KTH/MA

Copy to:

1. Hospital Director/ Chairman Accommodation committee MTI KTH Peshawar
2. Nursing Director, MTI KTH Peshawar
3. Assistant warden Nursing Hostel MTI KTH Peshawar
4. Incharge Security, MTI KTH Peshawar (for compliance)
5. Office Copy

21/12/22
Manager Accommodation
MTI-KTH Peshawar

ATTESTED



24

**MEDICAL TEACHING INSTITUTION
KHYBER TEACHING HOSPITAL, PESHAWAR
OFFICE OF THE MANAGER ACCOMMODATION**

No. 3846 /KTH/M.A

Dated: 28/12/2022

To

Ms. Nazia Gul D/O Said Wali Khan
Head Nurse
MTI KTH Peshawar

Subject: VACATION NOTICE

Memo:

Reference to the subject cited above, I am directed to address you;

That You were serving in MTI-KTH Peshawar in the capacity of Charge Nurse.

That You were provided accommodation inside the hospital in **Extra Flat 1 New Student Hostel** MTI-KTH Peshawar.

Where as You were transferred from MTI-KTH Peshawar vide **Notification of Government of khyber pakhtunkhwa SOH III/3-5/2022 Dated 23rd Sep 2022.**

That as per MTI KTH Peshawar Accommodation rules No. 10 you were given Grace period for more than 02 Months for retention of the said residence and you are required to vacate your occupied residence subject to the provision of paying the Flat rent and other utility charges and report to this office.

That as per MTI KTH Peshawar Accommodation rules you have been given sufficient time for your stay and after your transfer the stipulated time for retention of flat has also expired.

Where as you are also issued vacation notice vide No 3662/KTH/M.A on dated 21.12.2022 but you failed to vacate the said residence.

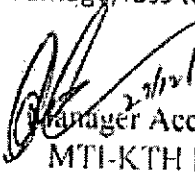
Where as you failed to vacate your occupied residence beyond the stipulated period, which is contrary to the residential Act rule No 26 (3) which can lead to heavy penalty.

Where as Nursing staff of MTI-KTH are facing accommodation problems and have waited since long

But you are not cooperating in this regard and failed to vacate your occupied residence till date due to which nursing staff of MTI-KTH is also suffering.

Now therefore, with the approval of the competent authority this vacation notice is issued upon you under the provision of MTI KTH Peshawar Accommodation rules 2015, that you Ms. Nazia Gul D/O Said Wali Khan resident of **Ex-Flat 1 New Student Hostel** MTI KTH Peshawar is hereby directed to vacate the subject residence within 03 days of the issuance of this notice failing which your occupied residence shall be vacated by the Hospital administration as per rules/law.

In execution of the vacation administration shall bear no responsibility of any damage/loss to the luggage.


28/12/22
Manager Accommodation
MTI-KTH Peshawar

No. 3846 /KTH/MA

Copy to:

1. Hospital Director/ Chairman Accommodation committee MTI KTH Peshawar
2. Nursing Director, MTI KTH Peshawar
3. Assistant warden Nursing Hostel MTI KTH Peshawar
4. Incharge Security, MTI KTH Peshawar (with the request for vacation of the residence)
5. Office Copy


28/12/22
Manager Accommodation
MTI-KTH Peshawar


ATTESTED



MEDICAL TEACHING INSTITUTION

KHYBER TEACHING HOSPITAL, PESHAWAR.

Office of the Nursing Director

No 711 KTH/ND

D2 25

To,


Nazia Gul D/O Said Wali Khan
Charge Nurse (Civil Servant)

Subject: CLEARANCE OF PENDING DUES OF HOSTEL MTI, KTH, PESHAWAR.

With reference to the notification of the Government of Khyber Pakhtunkhwa SOH III/3-5/2022 dated: 23-07-2022, you were transferred from this institution of MTI, KTH, Peshawar.


In this connection, the undersigned received report from accommodation regarding your dues that are still pending. You have been given a grace period for more than 02 months for retention of residence but you have failed to vacate the occupied residence after the due time period.

Furthermore, you did not pay utility bills, flat rent, and no proper handing taking over took place. Therefore, you are directed to pay/clear accommodation dues details of which are attached here with this letter, as per rules & regulations of MTI, KTH.

 Nursing Director,
MTI-KTH, Peshawar.

No. 711 /KTH/ND- 11-8-23
Copy to:

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
2. Hospital Director, MTI, KTH, Peshawar.
3. Director Finance, MTI, KTH, Peshawar.
4. Manager Accommodation, MTI, KTH, Peshawar.
5. Assistant Warden Nursing Hostel MTI, KTH, Peshawar.
6. Charge Nurse Concerned.

 Nursing Director,
MTI-KTH, Peshawar.


ATTESTED



**MEDICAL TEACHING INSTITUTION
KHYBER TEACHING HOSPITAL, PESHAWAR
OFFICE OF THE MANAGER ACCOMMODATION**

CHING IN
g Hospital
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No. _____ KTH/MA

Dated: 10/08/2023

To
Nursing Director
MTI-KTH Peshawar

Subject: Report Of Ms. Nazia Gul D/C Said Wali Khan Accommodation

Reference to the subject cited above it is stated that,
That she was serving in MTI-KTH Peshawar in the capacity of Charge Nurse
That she was provided accommodation inside the hospital in Extra Flat 1 New Student Hostel MTI-KTH Peshawar
She was transferred from MTI-KTH Peshawar vide Notification of Government of Khyber Pakhtunkhwa SOH III/3-5/2022 Dated 23rd Sep 2022.
She was given Grace period for more than 02 Months for retention of the said residence
She was issued multiple vacation notices vide No 3662/KTH/M.A on dated 21.12.2022 and No.3846-KTH/M.A on dated 28.12.2022 and on dated 22.06.2023 but she failed to vacate the said residence
She failed to vacate the occupied residence beyond the stipulated period, which is contrary to the residential Act rule No 26 (3).
She has handed over the keys to another person rather than KTH administration.
She did not paid utility bills, flat rent till date details of which are as under.
She did not handed over the fixtures, furniture which was provided by the hospital administration.

Nazia Gul, Head Nurse, BPS-17		Flat Charges				Total
S.No	Month	HRS%	Gas	Elec	HRA	
1	Oct-22	3792	1500	1823	12557	21,262
2	Nov-22	3792	1500	1823	12557	21,262
3	Dec-22	3564	1500	1823	12557	18,496
4	Jan-23	3564	1500	1823	12557	18,496
5	Feb-23	3564	1500	1823	12557	18,496
6	Mar-23	3564	1500	1823	12557	18,496
7	Apr-23	3564	1500	1823	12557	21,111
8	May-23	3564	1500	1823	12557	23,601
9	Jun-23	3564	1500	1823	12557	24,771
10	Jul-23	3564	1500	1823	12557	201,273
Total Amount		3,792	1,500	3,413	12,557	

Accounts Officer
MTI, Khyber Teaching Hospital
Peshawar

Manager Accommodation
MTI-KTH Peshawar

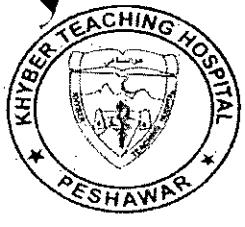
No. _____ /KTH/MA

Copy to:

- Hospital Director/ Chairman Accommodation committee MTI KTH Peshawar
- Director Finance MTI KTH Peshawar
- Assistant warden Nursing Hostel MTI KTH Peshawar
- Incharge Security, MTI KTH Peshawar (with the request for vacation of the residence)
- Office Copy

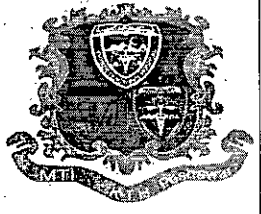
10/8/23
Manager Accommodation
MTI-KTH Peshawar

ATTESTED



MEDICAL TEACHING INSTITUTE

Khyber Teaching Hospital
Khyber Medical College
Khyber College of Dentistry



Office Of the Hospital Director

No. 2722 /KTH/ HD


Dated. 07-12 /2023

AUTHORITY LETTER

MTI-Khyber Teaching Hospital is an autonomous institution under MTI reforms Act, 2015. Under the Law each institution is defended by its own legal staff.

The post of Manager Legal as per MTI-KTH grading structure is BPS-18, therefore **Mr. Haroon Sarfaraz S/O Sarfaraz Khan**, Manager Legal MTI-KTH/KMC/KCD is hereby authorized to attend all courts of Law including Civil Court, Criminal Courts, High Courts, all Administrative, Service tribunal, Appellate Tribunal and Supreme Court of Pakistan on behalf of MTI-KTH/KMC/KCD, Peshawar.

He is competent and authorized to represent MTI-KTH/KMC/KCD in **Appeal No-1777/2023**, titled "**Mst. Nazia Gull V/S Government of KPK & others**" and further to sign all the Documents, Power of Attorney (Wakalatnama), swear affidavit, make statements, file any Petition/Plaint, written statement, reply, Comments, application, replication and to do all other acts and things which may be deemed necessary or advisable during course of the proceedings under my seal and stamp till further order.


Hospital Director,
MTI-KTH, Peshawar.

HOSPITAL DIRECTOR
Medical Teaching Institution
KTH, KMC, KCD,
Peshawar

POWER OF ATTORNEY

BEFORE THE HONORABLE KHYBER PAKHTUN-KHWA SERVICE
TRIBUNAL, PESHAWAR

Mst Nazia Gul.....

COMPLAINANT (s)
PÉTITIONER (s)
APPELLANT (s)
APPLICANT (s)
PLAINTIFF (s)

Versus

Government Of KPK &
Others.....

ACCUSED (s)
RESPONDENT(s)
DEFENDANT (s)

I/We Haron Saifraz the undersigned Respondent no 4

hereby appoint Zartaj Anwar, Asc in the above-mentioned case, to do all or any of the following acts, deeds and things.

1. To, appear act, and plead for me/ us in the above-mentioned case in this Court / Tribunal or nay other Court / Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits, and applications for compromise or withdrawal, or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
3. To receive payment of, and issue receipts for, all money that may be or become due and payable to me during the course on the conclusion of the proceedings.
4. To do all other acts and things which may be deemed necessary or advisable during the course of the proceedings.

AND HEREBY AGREE:

- a. To ratify whatever the said advocate may do in the proceedings.
- b. Not to hold the advocate, responsible if the said case be proceeded ex-parte or dismissed in default in consequences of their absence from the Court / Tribunal when it is called for hearing.
- c. That the Advocate shall be entitled to withdraw from the prosecution of the said case, if the whole or any part of the agreed fees remains unpaid.

In witness whereof I/We have signed this power of Attorney / Wakalatnama herein under, the contents of which have been read/ explained to me and fully understood by me on This 19 day of 10, 20 23 at Peshawar.

[Signature]
Signature of the executants/s

[Signature]
Attested and accepted.

Name of advocate: **Zartaj Anwar, ASC**

BC No.

Cell No.0332-9277514