

Form- A

FORM OF ORDER SHEET

Case No.

402/2024

Date of order

proceedings

Order or other proceedings with signature of judge or Magistrate

14/03/2024

The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court A.Abad Bench and the Hon'ble High Court vide its order dated 06.03.2024 while treating the Writ Petition into an appeal and has sent the same to this Tribunal for decision in accordance with law. This case is entrusted to touring Single Bench at A.Abd for preliminary hearing to be put up there on 26.03.2024.

By the Order of Chairman,


REGISTRAR



THE
PESHAWAR HIGH COURT
ABBOTTABAD BENCH.

PH: 0992-921058
FAX: 0992-921055
www.peshawarhcatd.gov.pk

No: 620

Appeal no 402/2024

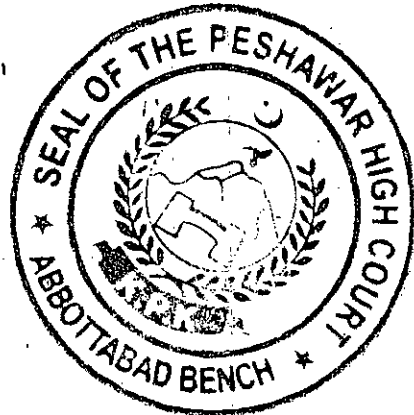
Dated Abbottabad 09 /03/2024

From

The Additional Registrar,
Peshawar High Court,
Abbottabad Bench.

To

The Registrar,
Service Tribunal of Khyber Pakhtunkhwa,
Peshawar.



Subject: WRIT PETITION No. 1495-A/2021.

Dr. Bushra Abdul Waheed

..... Petitioner

VERSUS

Govt. of Khyber Pakhtunkhwa & others

..... Respondents

* Memo,

I am directed to forward herewith a copy of Judgement dated 06.03.2024 passed by the Honorable Court D.B in the above noted case alongwith subject writ petition in original for Information & Compliance.

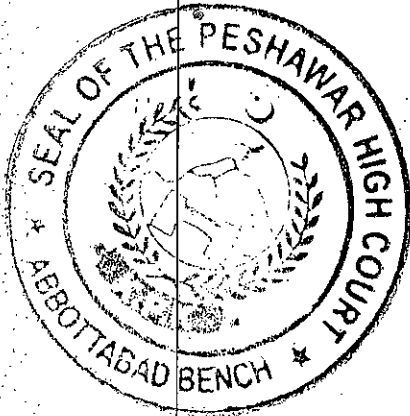
[Signature]
Additional Registrar

(Complete File of case can be downloaded from www.peshawarhcatd.gov.pk)

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with the Signature of the Judge.
1	2
06.03.2024	<p><u>WP No. 1495-A/2021</u></p> <p>Present: Mr. Abdul Aziz Tanoli, Advocate, and Mr. Adeel Ahmad Nazir, Advocate, for petitioner.</p> <p style="text-align: center;">***</p> <p><u>MUHAMMAD IJAZ KHAN, J.</u>- In essence, the grievance of the petitioner is that she was appointed on 06.09.2017 and, thereafter, she submitted her arrival report on 29.01.2019, however, the respondents are not paying her salary for the interregnum period.</p> <p>2. Learned counsel for petitioner was confronted that the grievance agitated by the petitioner in the instant petition pertains to her pay/salary which is one of the terms and conditions of her service and in view of the bar contained in Article 212 of The Constitution of The Islamic Republic of Pakistan, this Court lacks jurisdiction to entertain the instant writ petition he, thereafter, requested that he would be satisfied if the instant writ petition is converted into a service appeal and to send the same to the Khyber Pakhtunkhwa Service Tribunal for its decision.</p> <p>3. According, this writ petition is converted into a service appeal and sent to the Khyber Pakhtunkhwa Service Tribunal for its decision on its own merit.</p>

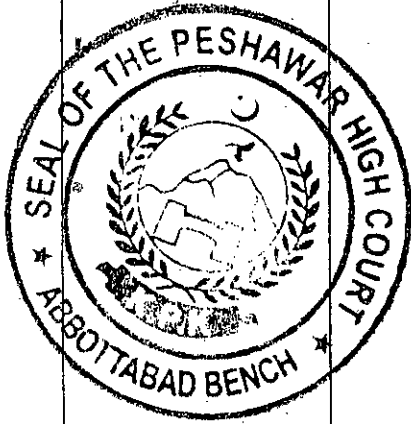


2/3

3. According, this writ petition is converted into a service appeal and sent to the Khyber Pakhtunkhwa Service Tribunal for its decision on its own merit.

 a3
JUDGE


JUDGE



IN THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH
OPENING SHEET FOR WRIT BRANCH

Case No. _____
Date of Filing _____
District: _____

Case Type: WRIT PETITION

Nature of Original Proceedings:

Category Code:

(Categories & Sub Categories are given at the back of the opening sheet)

Review/ Contempt of Court in respect of

Writ of; Habeas Corpus Prohibition Mandamus Quo Warranto Certiorari

Forum	Date	Interlocutory /Final Order	Caste Pertains to
			<input type="checkbox"/> SB
			<input type="checkbox"/> DB

Petitioner Name	Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO.
Mobile No.	
Address	Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad..
CNIC No.	13101-0139649-8
Email Address	

Counsel for Petitioner(s)	Abdul Aziz Khan Tanoli	Adeel Ahmed Nazir
Mobile No.	03009116915	0333-5038693
Address	Office No. 30 Jinnah Lawyers Plaza Abbottabad.	Office No. 30 Jinnah Lawyers Plaza, Abbottabad
CNIC No.	13101-7382881-9	13101-1299724-1
Email Address	abdulaziztanoli004@gmail.com	adeelahmed15671@gmail.com

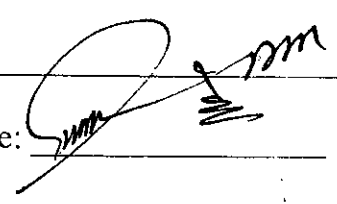
Respondent(s)	Government of Khyber Pakhtunkhwa through Secretary Health, Peshawar, and Others.
Address	Correctly given in the heading of writ petition.

FILED
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
3/12/21

Original Order/ Action/ Inaction Complained of;
Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973.

PRAYER; It is therefore, very respectfully prayed that on acceptance of the instant petition, a writ may kindly be issued to the effect that the petitioner, after being appointed on 13-09-2017 and after submitting her arrival on completing her TMO's training on 29-01-2019 and after being posted to DHQ Abbottabad vide notification dated 30-10-2019, is serving the department and performing her duties till date. The act of respondents, by not posting the petitioner in the intervening period, and despite of the order of regularization dated 30-10-2019 by respondent no-1, not issuing the salary and benefits of the petitioner for the intervening period and not issuing the 10% share of basic salary after joining the DHQ hospital till date is in complete contravention of law, rules/ regulations and is violation of the fundamental rights of the petitioner as enshrined in the constitution of the Islamic Republic of Pakistan 1973. Moreover act of respondent no-4 by not designating the petitioner the duties she has specialized for (FCPS surgery trained) and thereby violating the principle of "right person for the right job" and making her rolling stone by posting her from one department to another after short intervals is also illegal, and unconstitutional. The respondents may kindly be ordered to take the petitioner at charge w.e.f. 29-01-2019 and her salary and benefits for the intervening period along with 10% WMC share till date, may kindly be ordered to be released and petitioner may kindly be assigned the duties as according to her qualification and expertise. Any other relief this Honourable court deems fit and proper, in the circumstances, may also be granted.

Law/Rules/Governing the original proceedings/action/Inaction
1. Constitution of Islamic Republic of Pakistan, 1973

Signature: 

THE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD

Writ petition No. 2425 / 2021

Service Appeal no 402/2021

Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad.

...Petitioner

Versus

Government of Khyber Pakhtunkhwa, through Secretary Health, Peshawar and others.

...Respondents

WRIT PETITION

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1	Writ Petition along with certificate.	1-10	
2	Affidavit	11	
3	Copy of the Notification dated 06-09-2017	12-15	"A"
4	Copy of arrival report dated 29-01-2019	16	"B"
5	Copies of the notifications dated 08-08-2019 & 29-10-2019 along with arrival report dated 31-10-2019 and notification dated 27/01/2020	17-21	"C"
6	Copy of the order dated 31/10/2019	22	"D"
7	Copies of the internal transfer orders and letter dated 09/03/2021	23-25	"E"
8	Copy of Correspondence/ applications of the petitioner	26-28	"G"
9	Copy of Notification number SO(E)H-II/3-18/2019 dated 30/10/2019 of respondent no-1	29	"H"
7	Copy of the notices of filing of writ petition and receipts	30-35	"I"
8	Stamp paper worth Rs-500/-	36	
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SCANNED
15 DEC 2021

Through,

Dated 04-12-2021

PETITIONER

(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.

(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
3/12/21

**THE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD**

Writ petition No. 1495/2021

Service Appeal No. 402/2024

Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad.

...Petitioner

Versus

- 1- Government of KPK, through Secretary Health, Peshawar.
- 2- Director General Health Services, Khyber Pakhtunkhwa Peshawar.
- 3- District Health Officer, Abbottabad.
- 4- Medical Superintendent District Head-Quarter Hospital, District Abbottabad.
- 5- District Account Officer Abbottabad.

.....Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN 1973 AS AMENDED UP-TO-DATE, TO THE EFFECT THAT THE PETITIONER, AFTER BEING APPOINTED ON 06-09-2017 AND AFTER SUBMITTING HER ARRIVAL ON COMPLETING HER TMO's TRAINING ON 29-01-2019 AND AFTER BEING POSTED TO DHQ ABBOTTABAD VIDE NOTIFICATION DATED 30-10-2019, IS SERVING THE DEPARTMENT AND PERFORMING HER DUTIES TILL DATE, THE ACT OF RESPONDENTS, BY NOT POSTING THE PETITIONER IN THE INTERVENING PERIOD, AND DESPITE OF THE ORDER OF REGULARIZATION DATED 30-10-2019 BY RESPONDENT NO-1, NOT ISSUING THE SALARY AND BENEFITS OF THE PETITIONER FOR THE INTERVENING PERIOD FURTHERMORE NOT ISSUING THE 10% SHRE OF BASIC SALARY AFTER JOINING THE

*No. 7209
13-12-21*

**ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH**
27/12/21

DHQ HOSPITAL TILL DATE IS IN COMPLETE CONTRAVENTION OF LAW, RULES/ REGULATIONS AND IS VOILATION OF THE FUNDAMENTAL RIGHTS OF THE PETITIONER AS ENSHRINED IN THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN 1973. MOREOVER ACT OF RESPONDENT NO-4 BY NOT DESIGNATING THE PETITIONER THE DUTIES SHE HAS SPECIALISED FOR (FCPS SURGERY TRAINED) AND THEREBY VIOLATING THE PRINCIPLE OF "RIGHT PERSON FOR THE RIGHT JOB" AND MAKING HER ROLLING STONE BY POSTING HER FROM ONE DEPARTMENT TO ANOTHER AFTER SHORT INTERVALS IS ALSO ILLEGAL, AND UNCONSTITUTIONAL. THE ACTS OF RESPONDENTS ARE ILLEGAL UNLAWFUL AND ARE NOT ONLY DISCRIMINATION BUT ALSO SHEER VIOLATION OF FUNDAMENTAL RIGHTS OF PETITIONER, AGAINST THE LAW AND NORMS OF JUSTICE, HENCE ARE LIABLE TO BE INTRFERED BY THE HONOURABLE COURT.

PRAYER: ON ACCEPTANCE OF THE INSTANT PETITION, A WRIT MAY KINDLY BE ISSUED TO THE EFFECT THAT THE PETITIONER, AFTER BEING APPOINTED ON 06-09-2017 AND AFTER SUBMITTING HER ARRIVAL ON COMPLETING HER TMO'S TRAINING ON 29-01-2019 AND AFTER BEING POSTED TO DHQ ABBOTTABAD VIDE NOTIFICATION DATED 30-10-2019, IS SERVING THE DEPARTMENT AND PERFORMING HER DUTIES TILL DATE. THE ACT OF RESPONDENTS, BY NOT POSTING THE PETITIONER IN THE INTERVENING PERIOD, AND DESPITE OF THE ORDER OF REGULARIZATION DATED 30-10-2019 BY RESPONDENT NO-1, NOT ISSUING THE SALARY AND BENEFITS OF THE PETITIONER FOR THE INTERVENING PERIOD AND NOT ISSUING THE 10% SHARE OF BASIC SALARY AFTER JOINING THE DHQ HOSPITAL TILL DATE IS IN COMPLETE CONTRAVENTION OF LAW, RULES/ REGULATIONS AND IS VIOLATION OF THE FUNDAMENTAL RIGHTS OF THE PETITIONER AS ENSHRINED IN THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN 1973. MOREOVER ACT OF RESPONDENT NO-4 BY NOT DESIGNATING THE PETITIONER THE

FILE NO. 100/2017
 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH
 P/M

DUTIES SHE HAS SPECIALIZED FOR (FCPS SURGERY TRAINED) AND THEREBY VIOLATING THE PRINCIPLE OF "RIGHT PERSON FOR THE RIGHT JOB" AND MAKING HER ROLLING STONE BY POSTING HER FROM ONE DEPARTMENT TO ANOTHER AFTER SHORT INTERVALS IS ALSO ILLEGAL, AND UNCONSTITUTIONAL. THE RESPONDENTS MAY KINDLY BE ORDERED TO TAKE THE PETITIONER AT CHARGE W.E.F. 29-01-2019 AND HER SALARY AND BENEFITS FOR THE INTERVENING PERIOD ALONG WITH 10% WMC SHARE TILL DATE, MAY KINDLY BE ORDERED TO BE RELEASED AND PETITIONER MAY KINDLY BE ASSIGNED THE DUTIES AS ACCORDING TO HER QUALIFICATION AND EXPERTISE. ANY OTHER RELIEF THIS HONOURABLE COURT DEEMS FIT AND PROPER, IN THE CIRCUMSTANCES, MAY ALSO BE GRANTED.

Respectfully Sheweth,

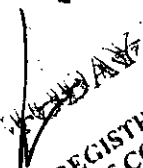
The petitioner very humbly submits as under:

1. That the petitioner successfully qualified the competitive examination through Public Service Commission and got appointed as Medical Officer BPS-17 in the respondent Department vide notification no SO(E)H-II/3-18/2017/1830 dated 06-09-2017. **(Copy of the Notification dated 06-09-2017 is Attached as Annexure "A")**
2. That the petitioner was granted extraordinary leave without pay for the purpose of training (TMOship). The petitioner successfully completed her FCPS-II training from post Graduate Medical Institute and duly reported the department on 29/01/2019 having diary number 4228. **(Copy of arrival report dated 29-01-2019 is attached as annexure "B")**
3. That the petitioner, after approaching the office of respondents several times, got posted vide notification dated 08-08-2019 and subsequently 29-10-2019 to District Head Quarter Hospital Abbottabad and assumed her charge on 31/10/2019 which was duly notified vide notification dated 27-01-2020. **(Copies of the notifications**

FILED FOR
 ADDITIONAL REGISTRAR
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 ABBOTTABAD BENCH
 3/12/21

dated 08-08-2019 & 29-10-2019 along with arrival report dated 31-10-2019 and notification dated 27/01/2020 are attached as annexure "C")

4. That the petitioner was adjusted at the disposal of HOD Gynae WCH by respondent no-4 vide order dated 31/10/2019 which obviously was not the job according to her specialties (Copy of the order dated 31/10/2019 is Attached as Annexure "D")
5. That, from that point onwards; the petitioner was made a ping pong ball by being transferred from one department to another on regular basis, making sure that she does not get the field of her specialty. It is pertinent to mention here that HOD Surgical unit through a letter dated 09/03/2021 recommended the adjustment of petitioner in surgery ward as the surgery ward was short of medical officer for the smooth running of the said ward but such genuine request of HOD also went prey to the high handedness of respondent no-4 (Copies of the internal transfer orders and letter dated 09/03/2021 are attached as Annexure "E")
6. That the irony of the situation was aggravated when the petitioner was adjusted in the respondent Hospital neither the salary of the petitioner was issued from date of her arrival till 30-10-2019, nor the 10% share of WMC(Part of salary) on proportionate basis was released, despite of several requests and correspondence of the petitioner with respondents, the petitioner also moved an application to Commandant WMC for release of her 10% share which was not considered. (Copy of Correspondence/ applications of the petitioner is attached as annexure "G")
7. That the stance of petitioner was affirmed by the self explanatory letter issued from the office of respondent no-1 wherein the right of petitioner to the extent of salary for the intervening period was accepted but no further action


 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
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 23/12/21

whatsoever was taken by the respondents and the salary for the period still stands unpaid. (Copy of Notification number SO(E)H-II/3-18/2019 dated 30/10/2019 of respondent no-1 is attached as annexure "H")

8. That the acts of respondents has not only deprived the petitioner from her hard earned salary but also her service period is not being taken into count, adversely affecting the seniority, pay and allowances of the petitioner.
9. That having neither any final order against the petitioner nor any alternate equally efficacious remedy for the redressal of the grievances, the petitioner has come to this honorable court, invoking constitutional jurisdiction, on the following inter alia amongst many other;

GROUNDS:

- a. That act of respondents is against the law, unconstitutional, discriminatory, victimizing, Malafide, Biased, perverse and void ab-initio; hence liable to be interfered in constitutional jurisdiction of this Honourable court.
- b. That the petitioner is discriminated against in a complete violation of article-25 of the constitution of Islamic Republic of Pakistan.
- c. That the act of respondents squarely falls within the definition of exploitation as defined in the constitution of Islamic Republic of Pakistan.
- d. That the public functionaries are bound to act in accordance with law but the petitioner has not been dealt with in accordance with law and constitution, which warrants immediate interference by the Honourable Court.

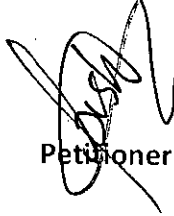
FILED TODAY
 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH
 2/12/20

- e. That the act of respondent department is not only against the norms of justice but also discriminatory, against the law and unwarranted.
- f. That respondent no-4 has missed no opportunity in humiliating, degrading and harassing the petitioner throughout her period in the hospital which has resulted in severe mental stress and health problems.
- g. That, notices have been served upon respondents as per rules. (Copies of the notice along with postal receipts are appended as annexure "I")
- h. That the Court fee stamp paper worth Rs. 500/- is attached.

It is therefore, very respectfully prayed that on acceptance of the instant petition, a writ may kindly be issued to the effect that the petitioner, after being appointed on 06-09-2017 and after submitting her arrival on completing her TMO's training on 29-01-2019 and after being posted to DHQ Abbottabad vide notification dated 30-10-2019, is serving the department and performing her duties till date. The act of respondents, by not posting the petitioner in the intervening period, and despite of the order of regularization dated 30-10-2019 by respondent no-1, not issuing the salary and benefits of the petitioner for the intervening period and not issuing the 10% share of basic salary after joining the DHQ hospital till date is in complete contravention of law, rules/ regulations and is violation of the fundamental rights of the petitioner as enshrined in the constitution of the Islamic Republic of Pakistan 1973. Moreover act of respondent no-4 by not designating the petitioner the duties she has specialized for (FCPS surgery trained) and thereby violating the principle of "right person for the right job" and making her rolling stone by posting her from one department to another after short intervals is also illegal, and unconstitutional. The respondents may kindly be ordered to take the petitioner at charge w.e.f. 29-01-2019 and her salary and benefits for the intervening period along with 10% WMC share till

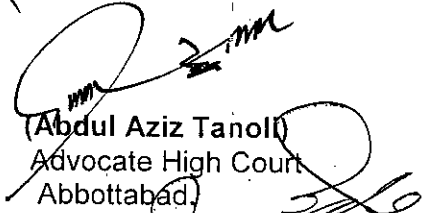
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 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
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 13/12/19

date, may kindly be ordered to be released and petitioner may kindly be assigned the duties as according to her qualification and expertise. Any other relief this Honourable court deems fit and proper, in the circumstances, may also be granted.


Petitioner

Through:

Dated 04-12-2021

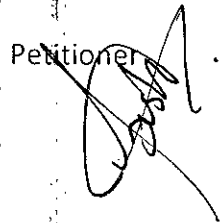

(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.

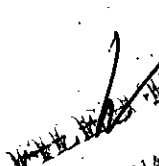
(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

VERIFICATION:

Verified on oath that the contents of foregoing writ petition are true and correct to the best of my knowledge and belief and nothing has been mis-stated or concealed from this Honourable Court.

Dated 04-12-2021

Petitioner



RECEIVED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
9/12/21

**THE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD**

Writ petition No. 1495 / 2021

Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad.

...Petitioner

Versus

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

...Respondents

WRIT PETITION

CERTIFICATE

Certified, that no such like Writ Petition has earlier been filed before this Hon'ble Court by the petitioner.

...PETITIONERS

Dated 04-12-2021

Through:

(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad

(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad

FILED
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
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**THE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD**

Writ petition No. 1495 / 2021

Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad.

...Petitioner

Versus

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

...Respondents

WRIT PETITION

LIST OF BOOKS

1. Constitution of Islamic Republic of Pakistan, 1973.
Other relevant case law will be cited at the bar.

...PETITIONER

Dated 04-12-2021

Through:

(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.

(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

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ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
8/3/22

**THE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD**

Writ petition No. 1425/2021

Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad.

...Petitioner

Versus

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

...Respondents

WRIT PETITION

ADRESSES OF PARTIES

Certified, that the addresses of the parties are correctly given at the title of the writ petition.

...PETITIONERS

Dated 04-12-2021

Through:

(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.

(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

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3/12/21

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**THE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH, ABBOTTABAD**

Writ petition No. 1495 / 2021

Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad.

...Petitioner

Versus

Government of Khyber Pakhtunkhwa, through Secretary Health, Peshawar and others.


...Respondents

WRIT PETITION

AFFIDAVIT

I, Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad (Petitioner), do hereby affirm and declare that the contents of instant Writ petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honorable Court.

13101 - 0139649 - 8


DEFENDENT

Dated 04-12-2021

6642/68

68

Dr. Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad

4-12-21

**FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH**
3/12/21



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 05th September 2017

NOTIFICATION.

No. SO(E)H-II/3-18/2017/1830: Upon the recommendations of Khyber Pakhtunkhwa Public Service Commission the Competent Authority (Chief Secretary Khyber Pakhtunkhwa) is pleased to appoint the following Medical Officers/Women Medical Officers, BS-17 in Health Department on regular basis with immediate effect:-

	Name & F/Name	District of Domicile
1.	Aaha Afric S/o Ajal Khan Afridi	Peshawar
2.	Aakifa Amir d/o Mohamad Amir Siddiqui	Peshawar
3.	Aamer Inayat s/o Inayat Ullah Khan	Lakki marwat
4.	Aamir Ali s/o Behmatullah	Swabi
5.	Aamir Kamran s/o Abdul Kamal	Karak
6.	Aamir Shahzad s/o Muhammad Nabi	Malakand
7.	Aamir Ubaid s/o Ubaidullah	Peshawar
8.	Aamir Zaman S/o Ayub Khan	Kohat
9.	Aasia Fozia d/o Muhammad idiskeen	Manshera
10.	Aasma Shams d/o Shams ul Wahab	Karak
11.	Aasman Asyar d/o Muhammad Anwar	Swat
12.	Aasyia Nagheen d/o Abdul Kamal	Karak
13.	Aatka Kamran d/o Habib Ullah Khan	Nowshera
14.	Aayezah Shahid d/o Shahid Mehmood	Peshawar
15.	Abbas Khan s/o Rahmat ul Haq	Peshawar
16.	Abbas Masood s/o Masood Javed	Peshawar
17.	Abdul Aziz S/o Abdul Mahboob	Swat
18.	Abdul Bari S/o Shereen Khan	Swabi
19.	Abdul Basil s/o Sher Badshah	Shangha
20.	Abdul Ghafoor S/o Lal Bahadar	Mardan
21.	Abdul Hadi s/o Sher Bar Khan	Dir Upper
22.	Abdul Hameed Khan s/o Muhammad Afzal Khan	Swat
23.	Abdul Hameed s/o Ihsan Jilal Tariq	Peshawar
24.	Abdul Jalal s/o Amir Nawaz	Buner
25.	Abdul karim s/o Abdul Mahood	Swat
26.	Abdul Latif S/o Abdul Qadous	Swat
27.	Abdul Majid s/o Faqal e Wahab	Peshawar
28.	Abdul Mannan Aftab s/o Aftab Ahmed Mughal	Abbottabad

[Signature]
Deputy Secretary (Admin)
Health Department
Govt of Khyber Pakhtunkhwa

BETTER COPY

GOVERNMENT OF KHYBER PAKHTUNKHAWA
HEALTH DEPARTMENT

BETTER COPY

Dated Peshawar the 06th September, 2017**NOTIFICATION:**

No. SO (E)H-I 1/3 -18/2017 1830: upon the recommendations of Khyber Pakhtunkhawa Public Service Commission the competent Authority (Chief Secretary Khyber Pakhtunkhawa) is pleased to appoint the following Medical Officer / Women Medical Officers, BS-17 in Health Department as regular basis with immediate effect:

S.#	Name & Father Name	District of Domicile
1	Aaha Afridi S/o Ajab Khan Afridi	Peshawar
2	Aakifa Aamir D/o Muhammad Amir Siddique	Peshawar
3	Aamer Inayat S/o Innayat Ullah Khan	Laki Marwat
4	Aamir Ali S/o Rehmanullah	Swabi
5	Aamir Kamran S/o Abdul Kamal	Korak
6	Amir Shahzad S/o Muhammad Nabi	Malakand
7	Amir Ubaid S/o Ubaid Ullah	Peshawar
8	Aamir Zaman S/o Ayub Khan	Kohat
9	Aasia Fozia D/o Muhammad Miskeen	Mansehra
10	Aasma Shams D/o Sham ul Wahab	Karak
11	Aasman Anwar D/o Muhammad Anwar	Swat
12	Aaiya Nageen D/o Abdul Kamal	Karak
13	Aatlka Kamran D/o Habib Ullah Khan	Nowshehra
14	Aayeza Shahid D/o Shahid Mehmood	Peshawar
15	Abbas Khan S/o Rahmat Ul Haq	Peshawar
16	Abbas Masood S/o Masood Javed	Peshawar
17	Abdul Aziz S/o Abdul Mehboob	Swat
18	Abdul Bari S/o Shereen Khan	Swabi
19	Abdul Basit S/o Sher Badshah	Shangal
20	Abdul Ghafoor S/o Lal Bahadar	Mardan
21	Abdul Hadi S/o Sherbaz Khan	Dir Upper
22	Abdul Hameed S/o Muhammad Afzal Khan	Swat
23	Abdul Hameed S/o Ihsan Jhah Tariq	Peshawar
24	Abdul Jalal S/o Amir Nawab	Bruer
25	Abdul Karim S/o Abdul Maboob	Swat
26	Abdul Latif S/o Abdul Qadoos	Swat
27	Abdul Majid S/o Fazal e Wahab	Peshawar
28	Abdul Manan Aftab S/o Aftab Ahmed Mughal	Abbottabad

BETTER COPY

269.	Aysha Bibi d/o Haliq ur Rehman	Swat
270.	Azami Ali Khan S/o Mahr Munir Khan	Buner
271.	Azeeta Israr d/o Muhammad Israr	Mardan
272.	Azhar Ali Qaisar S/o Mazhar Ali	Kohat
273.	Azhar Ali s/o Amin ul Haq	Swat
274.	Aziz Ur Rahman S/o Amir Behman	Malakand
275.	Azmat Ali Khan s/o Schrab Khan	Swat
276.	Azmat Ali S/o Dilaram Khan	Buner
277.	Azmat Wali Shah s/o Nigaban Shah	Chitral
278.	Babar Khan s/o Rajmal Khan	Buner
279.	Babar Riaz s/o Muhammad Riaz	Haripur
280.	Babar Shahzad Sadiq s/o Abdul Sadiq	Manshara
281.	Badar Mahmood Shah s/o Syed Saadat Shah	Karak
282.	Bahar Ali S/o Malik Zaid Khan	Dit Upper
283.	Bahar Ali S/o Zafar Ali Shah	Buner
284.	Bahar Nawab s/o Nawab Ali	Charsadda
285.	Bakht Babar s/o Mukhtiar Ahmad	Mardan
286.	Bakht Beland s/o Fazal Rehman (through proper channel from Labour Deptt)	Dit lower
287.	Bakht Buland Shah s/o Fazal Muhammad	Shangla
288.	Bakht Rahman S/o Bakht Sardar	Swat
289.	Bakht Umar Khan s/o Umar Nawaz Khan	Bannu
290.	Balqees d/o Jamal Shah	Nowshera
291.	Barka Sajjad d/o Sajjad Hussain	Peshawar
292.	Basirat Bukhari d/o syed Akbar Shah	Peshawar
293.	Basit Hussain s/o Sibtain Hussain	Kohat
294.	Bayazeed s/o Tila Muhammad	Mardan
295.	Bazhidat Bibi d/o Khan Sali	Peshawar
296.	Beena Khan d/o Mohtasim Billah	Mardan
297.	Beenish Adnan D/o Javed Akbar	Swat
298.	Beenish Khan d/o Amir Bashir Khan	Mardan
299.	Beenish Malik D/o Bari Malik	Peshawar
300.	Beenish Gul D/o Ashfaq Khan	Abbottabad
301.	Behzad Kaleem Baloch S/o Musa Kaleem Baloch	D.I. Khan
302.	Benish Hira D/o Pir Muhammad Khan	Kohat
303.	Bibi Fatima d/o Gohar Zaman	Charsadda (husband)
304.	Bibi Sajida d/o Muhammad Younas	Karak
305.	Bibi Sara D/o Hassan Shah	Peshawar
306.	Bilal Ahmad Khan S/o Atta Ullah Khan	Bannu
307.	Bilal Ahmad S/o Mufarrah Shah	Peshawar
308.	Bilawal Anjum s/o Akbar Ali	Swabi
309.	Breshna Hamayun d/o Hamayun Khan	Charsadda
310.	Bublish Rehman d/o Habib ur Rehman	Haripur
311.	Bushra Abdul Waheed d/o Abdul Waheed	Haripur
312.	Bushra Anwar d/o Anwar Khan	Manshara
313.	Bushra Arif d/o Muhammad Arif	Manshara
314.	Bushra Rashid D/o Abdul Fashid	Mardan

2
 Deputy Secretary (Admin)
 Health Department
 Govt of Khyber Pakhtunkhwa

BETTER COPY

(14)

BETTER
COPY

269	Ayesha Bibi D/o Mehtab Ur Rehman	Swat
270	Azam Ali Khan S/o Muhammad Khan	Buner
271	Azeeta Israr D/o Muhammad Israr	Mardan
272	Azhar Ali Qaiser S/o Mazhar Ali	Kohat
273	Azhar Ali S/o Amin Ul Haq	Swat
274	Aziz ur Rehman S/o Amir Rehman	Malakand
275	Azmat Ali Khan S/o Sohrab Khan	Swat
276	Azmat Ali S/o Dilaram Khan	Buner
277	Azmat Wali S/o Nagahban Shah	Chitral
278	Babar Khan S/o Rajmal Khan	Buner
279	Babar Riaz S/o Muhammad Riaz	Haripur
280	Babar Shahzad Sadiq S/o Abdul Sadiq	Mansehra
281	Badar Mehmood Shah S/o Syed Saddat Shah	Karak
282	Bahar All S/o Malik Zad Khan	Dir Upper
283	Bahar All S/o Zafar Ali Shah	Buner
284	Bahar Nawab S/o Nawab Ali	Charsadda
285	Bakht Babar S/o Mukhtiar Ahmed	Mardan
286	Bakht Beland S/o Fazal Rehman (Through Proper Channel from Labour Department)	Dir Lower
287	Bakht Buland Shah S/o Fazal Muhammad	Shangla
288	Bakht Rehman S/o Bakht Sardar	Swat
289	Bakht Umar Khan S/o Umar Nawaz Khan	Bannu
290	Balqees D/o Jamal Shah	Nowshera
291	Barka Sajjad D/o Sajjad Hussain	Peshawar
292	Basirat Bukhari D/o Syed Akbar Shah	Peshawar
293	Basit Hussain S/o Sibtain Hussain	Kohat
294	Bayazeed S/o Tila Muhammad	Mardan
295	Bazhida Bibi D/o Khan Sali	Peshawar
296	Beena Khan D/o Mohtasim Billah	Mardan
297	Beenish Adnan D/o Javed Akbar	Swat
298	Beenish Khan D/o Amir Bashir Khan	Mardan
299	Beenish Malik D/o Bari Malik	Peshawar
300	Beenish Gul D/o Ashfaq Khan	Abbottabad
301	Behzad Kaleem Baloch S/o Musa Kaleem Baloch	DI Khan
302	Benish Hira D/o Pir Muhammad Khan	Kohat
303	Bibi Fatima D/o Gohar Zaman	Charsadda (Husband)
304	Bibi Sajida D/o Muhammad Younas	Karak
305	Bibi Sara D/o Hassan Shah	Peshawar
306	Bilal Ahmed Khan S/o Atta Ullah Khan	Bannu
307	Bilal Ahmed S/o Mufarih Shah	Peshawar
308	Bilawal Anjum S/o Akbar Ali	Swabi
309	Breshna Hamayun D/o Hamayun Khan	Charsadda
310	Bublish Rehman D/o Habib ur Rehman	Haripur
311	Bushra Abdul Waheed D/o Abdul Waheed	Haripur
312	Bushra Anwar D/o Anwar Khan	Mansehra
313	Bushra Arif D/o Muhammad Arif	Mansehra
314	Bushra Rashid D/o Abdul Rashid	Mardan

BETTER COPY

7. The doctors concerned are required to report for duty within 15-days of the issuance of this notification failing which the appointment will stand automatically cancelled.

8. The above serial number does not denote seniority position as the same is framed alphabetically.

9. Those doctors who are doing TMOship (inside or outside the country) shall proceed on Extra Ordinary Leave (EOL) without pay as per provision of Section 7(3) of The Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors And Doctors) Regulatory Act, 2011 after completion of all endal formalities.

SECRETARY HEALTH
KHYBER PAKHTUNKHWA

Endst: of even number & date

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. Deputy Director (IT), Health Department Peshawar.
4. Coordinator HSRU, Health Department Peshawar.
5. PS to Senior Minister for Health Khyber Pakhtunkhwa.
6. PS to Secretary Health, Peshawar.
7. Doctors concerned.


(Zubair Ahmed)
Deputy Secretary (Admn)

5

BETTER
COPY

7. The doctors concerned are requested to report for only within 15 days of the issuance of this notification failing which the appointment will stand automatically cancelled.
8. The above serial number does not denote seniority position as the same is framed alphabetically
9. Those Doctors who are doing TMOship inside or outside the country shall proceed on extra ordinary Leave (EOL) without pay as per provision of section 7(3) of the Khyber Pakhtunkhwa (Appointment Deputation Posting and Transfer of Teachers, Lecturer's, Instructors and Doctors) Regulatory Act 2011 after completion of all codal formalities.

**SECRETARY HEALTH
KHYBER PAKHTUNKHAWA**

Endst. Of even number & dated:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Director (IT) Health Department Peshawar.
4. Coordinator HSRU, Health Department Peshawar.
5. PS to Senior Minister for Health Khyber Pakhtunkhawa.
6. PS to Secretary Health Peshawar.
7. Doctors Concerned.

Sd/-
(ZUBAIR AHMED)
Deputy Secretary (Admn)

Director General Health Services,

16

Annexure "B"

K.P.K

Peshawar,

Subjed: Arrival Report

29/11/19
29/11/19

Respected Sir,

I wish to state that I have been appointed as MO-BPS-17 in health department (ADVT

NO 04/2016) (S.No 21, 22, 23 & 24)

I had availed EOL as I was working as TMO in Ayub teaching hospital Abbottabad

Now my training has finished & I wish to give arrival as MO-BPS-17

Kindly appoint me according to my zones I would be very grateful to you for this act

Thank you,

Yours Obediently

Dr. Bushra Azeem Wajeeh

MO-BPS-17

29/11/19

S.No 32

Id. No. 0332628777

(REG-7108-40)

(17)

Annexure "C"



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Dated Peshawar the 08th August, 2019

No. SO(E)H-II/4-1/2017/P Upon completion of TMCship, the following doctors, awaiting for posting are hereby posted under 7(3) of Health Regulatory Act 2011 as mentioned against their names with immediate effect in the public interest:

S.#	Name of doctor	Place of posting
1	Dr. Laila Saifullah D/O Saifullah, WMO, BS-17	WMO, W&C Hospital Charsadda
2	Dr. Muhammad Sharif s/o Alim Harder, MO, BS-17	MO Type-D Hospital Besham Shangla
3	Dr. Muhammad Aftab s/o Boostan Khan, MO, BS-17	MO, DHQ Hospital Charsadda
4	Dr. Syed Yasir Ahmad s/o Mian Ghafoor Shah, MO, BS-17	MO, DHQ Hospital Buner
5	Dr. Muazzam Ali Shehzad s/o Muhammad Akram, MO, BS-17	MO, Type D-Hospital Lora, Abbottabad
6	Dr. Abdul Aziz s/o Guldash, MO, BS-17	MO, BS-17 at DHQ Hospital Shangla
7	Dr. Zahid Khan s/o Jehangir Khan, MO, BS-17	MO Cat-D Hospital Loe Agra Malakand
8	Dr. Javeria Nawaz D/O Allah Nawaz WMO, BS-17	MO Type-D Hospital Pahar Pur D.I.Khan
9	Dr. Rizwanullah s/o Ayaz Muhammad, MO, BS-17	MO DHQ Hospital Baltagram
10	Dr. Rafiullah Khan s/o Ikramullah Khan, MO, BS-17	MO KGN Bannu
11	Dr. Syed Muhammad Qasim Shah s/o Syed Muhammad Zahid Shah, MO, BS-17	MO, RHC Gumbat Mardan.
12	Dr. Syed Abid Habib s/o Syed Faisal Habib, MO, BS-17	MO Type-C Takht Bhal Mardan.
13	Dr. Hamid Ali Shar s/o Anwar Shah, MO, BS-17	MO DHQ Hospital Haripur
14	Dr. Dura Nayab D/O Habibullah Khan, WMO, BS-17	MO Civil Hospital chodwan D.I.Khan.
15	Dr. Zarib Rana D/O Azhar Salim Rana, WMO, BS-17	MO Type-D Lora Abbottabad.
16	Dr. Huma Gul D/O Abid Khan, WMO, BS-17	MO Type-D Hospital Lundkwar Mardan.
17	Dr. Muhammad Irshad s/o Mir Shad Khan, MO, BS-17	MO Type-D Hospital Oghi Mansehra.
18	Dr. Khadija Rehman D/O Shafiq ur Rahman, WMO, BS-17	MO DHQ Hospital Batkhela.
19	Dr. Sedia Ayaz D/O Mohammed Ayaz, WMO, BS-17	MO DHQ Hospital Nowshera
20	Dr. Aniqah Habib D/O Habib ur Rehman, WMO, BS-17	MO Type-D Oghi Mansehra
21	Dr. Afrasiab s/o Zafar Ali Khan, MO, BS-17	MO Type-D Hospital Titterkhel Lakki Marwat
22	Dr. Insanullah s/o Shams ul Haq, MO, BS-17	MO Type-C Hospital Sarf Naurang Lakki Marwat

[Handwritten signature]

178	Dr. Bushra Abdu. Waheed D/O Abdul Waheed, WMO, BS-17	MO Type-D Hospital Bari Nemat Khan Hanpur.
179	Dr. Asad Ghani s/o Fazal Rabbi, MO, BS-17	MO BKMC Swabi
180	Dr. Asmi Naeem s/o Inayat Ullah, MO, BS-17	MO DHQ Hospital Mardan
181	Dr. Abdur Rahim s/o Mohammad Zamin, MO, BS-17	MO SGTH Swat.
182	Dr. Muhammad Ismail s/o Hidayat Ullah, MO, BS-17	MO Sifwat Ghayur Shaheed Memorial Hospital Peshawar
183	Dr. Nasir Ali s/o Bakht Jamal, MO, BS-17	MO DHQ Hospital Timergara Dir Lower.
184	Dr. Muhammad Aslam Sadiq s/o Gul Zaman, MO, BS-17	MO DHQ Hospital Wana SW.
185	Dr. Ubaidullah s/o Muhammad Kamal, MO, BS-17	MO DHQ Hospital Shangla
186	Dr. Maimona Saeed D/O Muhammad Saeed, WMO, BS-17	MO LMH Kohal.
187	Dr. Hamid Ullah s/o Muzaffar Khan, MO, BS-17	MO W&C Hospital Karak.
188	Dr. Faheemullah s/o Lal Sher MO, BS-17	MO W&C Hospital Karak.
189	Dr. Syed Shujaat Hussain s/o Sharif Hussain, MO, BS-17	MO DHQ Hospital Parachinar Kurram.
190	Dr. Abdullah s/o Siddiq Akbar, MO, BS-17	MO W&C Hospital Rajjar Charsadda.
191	Dr. Saifullah s/o Motvi Mehmood, MO, BS-17	MO KATH Mansehra.
192	Dr. Hashmat Ullah Khan s/o Jamil Khan, MO, BS-17	MO DHQ Hospital Wana SW
193	Dr. Assad Mehmood s/o Aziz ur Rehman, MO, BS-17	MO Type-C Hospital Topi Swabi.
194	Dr. Mohammad Naeem s/o Gul Badshah, MO, BS-17	MO Type-D Hospital Kalu Khan Swabi.
195	Dr. Amjad Ali s/o Miraj Jan, MO, BS-17	MO DHQ Hospital Shangla.
196	Dr. Muhammad Yaseen s/o Sangeen Khan, MO, BS-17	MO DHQ Hospital Nowshera.
197	Dr. Haseeb Islam s/o Muhammad Islam, MO, BS-17	MO Type-D Totakan Hospital Malakand
198	Dr. Shahid Ayub s/o Ayub Khan, MO, BS-17	MO Services Hospital Peshawar.
199	Dr. Saeedullah s/o Hanifullah, MO, BS-17	MO Type-C Hospital Samar Bagh Dir Lower.
200	Dr. Shabbir Ahmad s/o Muhammad Haroon, MO, BS-17	MO Type-D Hospital Baffa Mansehra.
201	Dr. Shandana Sattar D/O Abdul Sattar Khan, WMO, BS-17	MO DHQ Hospital Shangla.
202	Dr. Asif Ahmad s/o Riaz Ahmad, MO, BS-17	MO Civil Hospital Terri Karak.
203	Dr. Haider Abid s/o Azhar Abid, MO, BS-17.	MO DHQ Hospital Nowshera.
204	Dr. Shoha'b Ahmad Khan s/o Shemim Ahmad Khan, MO, BS-17	MO DHQ Hospital Chitral
205	Dr. Zia ur Rehman s/o Muhammad Dost, MO, BS-17	MO DHQ Hospital Chitral.
206	Dr. Muhammad Abbas s/o Iqbal Hayat, MO, BS-17	MO DHQ Hospital Chitral.
207	Dr. Irum Jehan Afridi D/O Moin Gul Khan Afridi, WMO, BS-17	MO DHQ Hospital KDA Kohal
208	Dr. Musarat Zahir D/O Ali Haider, WMO, BS-17	MO DHQ Hospital Mohmand.

19



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 29th October, 2019

NOTIFICATION

No.SO(E)H-II/4-1/2017/P In partial modification of this Department's Notification of even number dated 08.08.2019, the place of posting in respect of Dr. Bushra Abdul Waheed D/O Abdul Waheed, WMO, BS-17 appearing at S.No.178 may be read as DHQ Hospital Abbottabad instead of Type-D Hospital Sari Naimat Khan Haripur.

SECRETARY HEALTH
KHYBER PAKHTUNKHWA

Endst. of even No. & Date.

Copy to the

1. Accountant General Khyber Pakhtunkhwa
2. Director General Health Services Khyber Pakhtunkhwa
3. DHO Haripur
4. MS, DHQ Hospital Abbottabad
5. DAO Abbottabad/Haripur
6. PS to Minister for Health Khyber Pakhtunkhwa
7. PS to Secretary Health Khyber Pakhtunkhwa
8. Doctor concerned.


(Hamid Iqbal)
Section Officer (E-II)

29

To

The Medical Superintendent
BBS teaching hospital

Abbottabad,

Subject :- Arrival Report for Duty As WMO BPS 17

Respected Sirs,

In compliance with health dept
notification number SO (E) H-II/4-1/2017/A

Dated 29th/10th/2019. I Dr Bushra Abdul
Waheed D/o Abdul Waheed hereby submit
my arrival report for duty as WMO - BPS - 17
today on 31/10/2019.

Please accept my arrival report

Arrival accepted
and forwarded to Mrs
[Signature]
31-Oct-2019

Yours truly
Dr. Bushra Abdul
Waheed
WMO - BPS - 17

[Signature]
31-Oct-2019

(21)



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications Should be Addressed to The Director General Health Services
Peshawar And not to any official by name.

Office Ph (091-9210269 Exchange) St 091-9210187, Fax (091-9210230)

No. _____/E-I

Dated the Pesh: ____/01/2020

NOTIFICATION:

On her 1st appointment as Women Medical Officer (BS-17) on regular basis through Public Service Commission Khyber Pakhtunkhwa Peshawar & after completion of her TMO Ship at PGMI Peshawar, Dr. Bushra Abdul Waheed D/O Abdul Waheed has assumed charge of her duties as Women Medical Officer (BPS-17) at BBS Teaching Hospital Abbottabad on 31-10-2019.

Deputy Director (HRM)
Directorate General Health Services
Khyber Pakhtunkhwa

The Manager,
Govt: Printing Press Khyber Pakhtunkhwa Peshawar,
For Publication in Govt: Gazett.

No. _____/E-I

Dated the Pesh: 11 /01/2020

Copy forwarded to the: -

1. Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.
2. M.S BBS Teaching Hospital Abbottabad.
3. District Accounts Officer Abbottabad. (Health & Age Certificate attached).
4. Doctor Concerned.
5. AE-IV DGHS Office KP Peshawar.

For information and necessary action.

M. Shahid
Deputy Director (HRM)
Directorate General Health Services
Khyber Pakhtunkhwa

27/01/2020

(22)

OFFICE OF THE MEDICAL SUPERINTENDENT,

BBS TEACHING HOSPITAL, ABBOTTABAD.

Annexure "D"

OFFICE ORDER:-

The internal adjustment of following Women Medical Officers BPS-17 is hereby ordered for the smooth running of hospital in the best interest of public service with immediate effect:-

S.NO	NAME OF DOCTOR	FROM	ADJUSTED
1.	Dr. Fazilat	Anesthesia	At the disposal of HOD Gynae Women & Children hospital Abbottabad
2.	Dr. Qurat Ul Ain	Surgical	----do---
3.	Dr. Bushra Abdul Waheed	Newly arrived/posted.	----do---
4.	Dr. Irda Khan	Paeds	----do---
5.	Dr. Saima Jameel	Gynae	At the disposal of HOD Paeds.

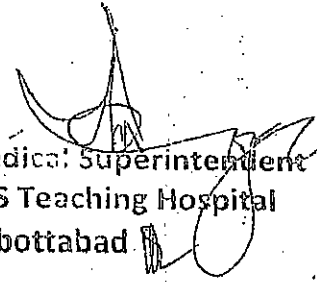
Sd/----

Medical Superintendent
BBS Teaching Hospital
Abbottabad

No: 6879 - 88 Dated: 31 /10/2019.

Copy to the:-

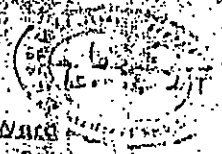
1. Deputy Medical Superintendent Administration BBS Teaching Hospital Abbottabad
2. DMS Women & Children Teaching Hospital Abbottabad
3. Head of Department Gynae/Paeds Women & Children teaching Hospital; Abbottabad
4. Above doctors for compliance.
5. Incharge DHIS cell BBS Teaching Hospital Abbottabad


Medical Superintendent
BBS Teaching Hospital
Abbottabad

(23)

Annexure E

To
The Medical Superintendent,
BBS Teaching Hospital, Abbottabad



Subject: Dr. Bushra Abdul Waheed (M.O) Allotted to Surgery Ward

Dear Sir,

With reference to the request generated on 06.03.2021 to your kind self regarding the deficiency/ Non availability of Medical Officer in surgical unit (Dr. Fayyaz Shah has already left the department since 28th February, 2021). Surgery ward is short of Medical Officers. It is recommended that Dr. Bushra Abdul Waheed (Medical Officer) has the desired surgical skills & is willing to join the unit, so kindly shift her to surgery unit for smooth running of ward.

Moreover, we have arranged the alternate duties of Saturday evening of current M.Os of the department until further orders, but also requesting to your kind self shift her in surgical ward.

Thanking in anticipation & obliged.

Yours Sincerely

Dr. Ghulam Nabi
HOD (Surgical Unit)

BBS Teaching Hospital, Abbottabad

*The doctor concerned
is already non-compliant
she was reported absent
from duty jobs. On the
her request is on she
has not reported.
Your request can be
considered after her
conformance to previous
directive*

(24)

OFFICE OF THE MEDICAL SUPERINTENDENT BBS TEACHING HOSPITAL
ABBOTTABAD.

OFFICE ORDER:-

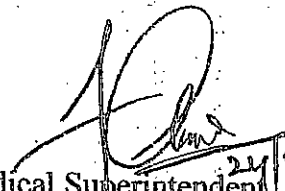
In view strengthening of Trauma Services of BBS Teaching Hospital Abbottabad; Services of Dr. Bushra Waheed (FCPS Surgery Trained) Women Medical Officer BPS 17 attached to Gynae Unit of Women & Children Hospital Abbottabad are hereby placed at Orthopedic Unit of this Institution with immediate effect. *in public interest*

Sd/xxxx
Medical Superintendent
BBS Teaching Hospital
Abbottabad.

No. 4539-35 dated Abbottabad the 24/08 /2020.

Copy to:-

- DMS Administration BBS Hospital Abbottabad for information please.
- HOD Orthopedic BBS Teaching Hospital Abbottabad for information please.
- HOD Gynae. W & C Teaching Hospital Abbottabad for information please
- Officers Concerned for information please.


Medical Superintendent
BBS Teaching Hospital
Abbottabad

25

OFFICE OF THE MEDICAL SUPERINTENDENT BBS TEACHING HOSPITAL
ABBOTTABAD.

OFFICE ORDER


As services of two Women Medical Officer has been withdrawn from Gynae Unit of Women & Children Hospital Abbottabad and placed at COVID-19 ward; services of Dr. Bushra Aziz attached to Orth. Unit BBS Hospital Abbottabad are hereby placed at the disposal of HOD Gynae Unit BBS Hospital Abbottabad for further assignment of duties with immediate effect, with perspective of exigency of services and public interest.

XXXXXXXXXX
Medical Superintendent,
BBS Teaching Hospital,
Abbottabad

No. 6744-45 dated Abbottabad the 09-12-2020

Copy to

- HOD Gynae Unit BBS Hospital Abbottabad.
- Officer Concerned for information please.


Medical Superintendent,
BBS Teaching Hospital,
Abbottabad

OFFICE OF THE MEDICAL SUPERINTENDENT BBS
TEACHING HOSPITAL ABBOTTABAD.

OFFICE ORDER:-

As services of two Women Medical Officer has been withdrawn from Gynae Unit of Women & Children Hospital Abbottabad and placed at COVID-19 ward; services of Dr. Bushra Aziz attached to Orth: unit BBS Hospital Abbottabad are hereby placed at the disposal of HOD Gynae Unit BBS Hospital Abbottabad for further assignment of duties with immediate effect in perspective of exigency of services and public interest.

Sd/xxxxxxx
Medical Superintend.
BBS Teaching Hospital,
Abbottabad

No.6744-45/ dated Abbottabad the 09/12/2020

Copy to:-

- HOD Gynae Unit BBS Hospital Abbottabad.
- Officer Concerned for informational please.

Medical Superintend.
BBS Teaching Hospital,
Abbottabad

00-OCT-2019

(26)

Annexure "G"

To,

MS DHQ Hospital,
Abdullahabad,

Subject:- SOURCE FORM II

Respected Sir,

This is to bring to your notice that I have been regularised By health secretariat for the period of 29.01.2019 till 30.10.2019 (No. SO(E)H-II /3-18/2


Kindly prepare my source form for above mentioned Duration & release my regularised pay

Thank you

Your's truly

Dr Bushra
Abdul Waheed

30-Oct 2019
MO.BPS-17

 DHQ
Abdullahabad

27

10/2/2020

To,

The Commanding officer,

CO, WMC,

Subject: issuence of share

Respected Sir,

I wish to state that

I havent recieved by WMC share

since 9/4/2020 - I have been

working in DHCQ hospital since 30/10/2019

and only recieved share once on 9/4/2020

of amount 3037 only - kindly look into

the matter & issue my share

Thank you

Your's Obediently

Dr Bushra Akmal

Waheed

NO-BPS-17

DHCQ Hospital

Abulhabab,

To

Worthy Health Minister,

Govt of KPK

SUBJECT; work place harassment at the hands of MS Aamir Israr

Respected Sir,

I am Dr. Bushra Abdul Waheed working as Medical Officer BPS. 17 in DHQ Hospital Abbottabad and this letter is a reminder to Directorate and Secretariat about workplace harassment I am facing at the hands of Aamir Israr. Still He has not issued orders of my adjustment in Surgery ward as I am a General Surgeon. I was wasted in gynae for thirteen months as torture as I had complained on eportal about my adjustment and salary issue. Then transferred to ortho, later COVID later gynae within three months. Its worth mentioning that His Wife Dr Sadaf is in radiology morning duty since day one for more than 5 to 6 years though she is simple MBBS.

Aamir israr is trying to deduct my 10 percent wmc share while his wife Dr sadaf enjoyed additional radiology share without expertise in it and also somehow got paid leave frequently for months when government has declared covid emergency. Amir Israr is mentally torturing me both directly and indirectly. After this kindly initiate inquiry and put an end to his various tactics.

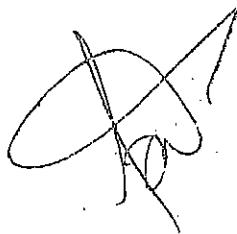
Kindly inquire this issue and make working environment favourable for doctors by doing justice. Thanks

Dated 08/2/2021

Dr. Bushra Abdul Waheed 03326287472
DHQ Abbottabad

Copy to

1. Chief Secretary to Govt of KPK
- 2 Secretary to Govt of KPK
3. DGHS





(29)

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 30th October 2019

NOTIFICATION

Annexure "H"

No. SO(E)H-II/3-18/2019. The awaiting for posting period from 29-01-2019 to 30-10-2019 is hereby regularized for the pay in respect of Dr. Bushra Abdul Waheed D/O Abdul Waheed, WMO, BS-17 attached to DH Hospital Abbottabad.

SECRETARY HEALTH
KHYBER PAKHTUNKHWA

Endst. No. & date even.

Copy to the:

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. MS, DHQ Hospital Abbottabad.
4. DAO Abbottabad.
5. PS to Secretary Health, Khyber Pakhtunkhwa, Peshawar.
6. PA to Deputy Secretary-I, Health Department.
7. Doctor concerned.


(Hamid Iqbal)
Section Officer (E-)

29

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar the 30th October 2019

NOTIFICATION

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KHYBER PAKHTUNKHWA**

Endst. No. & dated even.

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7. Doctor concerned.

Sd/-
(Hamid Iqbal)
Section Officer (E-I)

(30)

ABDUL AZIZ TANOLI &
ADEEL AHMED NAZIR

ADVOCATES HIGH COURT

OFFICE # 30 Jinnah Lawyers Plaza
District Courts Abbottabad

03118775478

03335038693

Annexure "i" v

To:

- 1- Government of KPK, through Secretary Health, Peshawar.
- 2- Director General Health Services, Khyber Pakhtunkhwa Peshawar.
- 3- District Health Officer, Abbottabad.
- 4- Medical Superintendent District Head-Quarter Hospital, District Abbottabad.
- 5- District Account Officer Abbottabad.

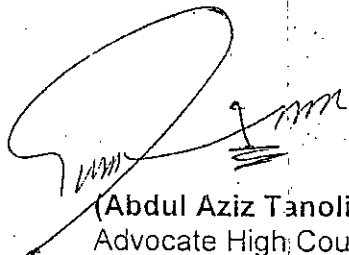
NOTICE OF FILING OF WRIT PETITION

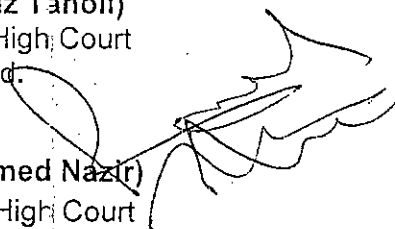
Sir,

Please take notice that I have been instructed by my client *Dr-Bushra Abdul Waheed Daughter of Abdul Waheed, WMO, Resident of Al-Awan House, Tarkanna Road Supply, Tehsil And District Abbottabad.(Petitioner)* to file Writ Petition on her behalf before the Hon'ble High Court of Peshawar Abbottabad Bench. (Copy of the writ petition is annexed herewith)

Instant notice is being served upon you for information.

Dated 04-12-2021


(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.


(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

31

ABDUL AZIZ TANOLI &
ADEEL AHMED NAZIR

ADVOCATES HIGH COURT

OFFICE # 30 Jinnah Lawyers Plaza
District Courts Abbottabad

03118775478

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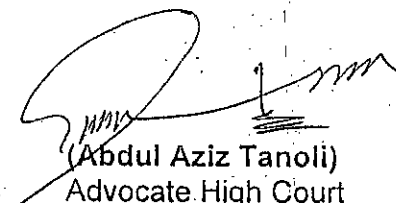
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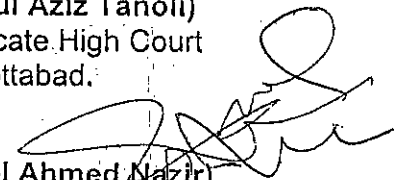
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ADEEL AHMED NAZIR

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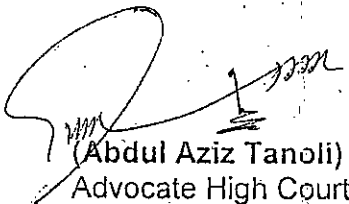
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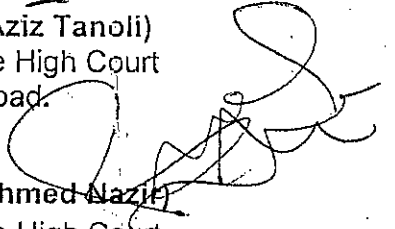
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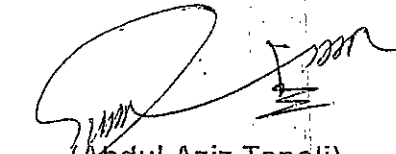
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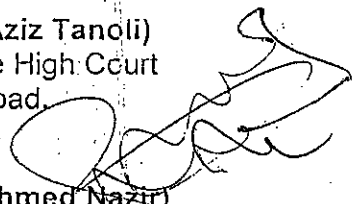
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Advocate High Court
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(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

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ADEEL AHMED NAZIR

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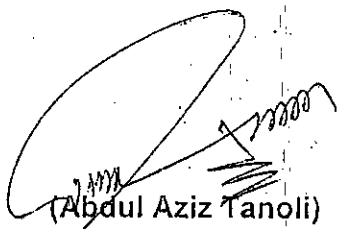
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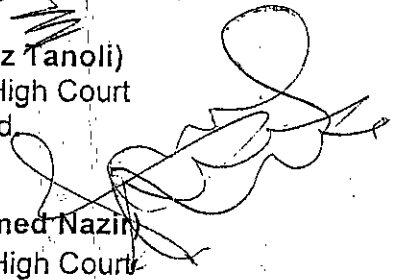
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(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad


(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

No. RGL58657991

Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. 50 Ps.

35

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Initials of Receiving Officer

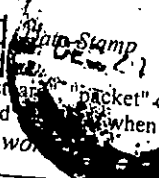
Insured for Rs. (in figures)

If insured.

Insurance fee Rs.

Name and address of sender

Weight (in words) Kilo Grams



RGL58657992

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Initials of Receiving Officer

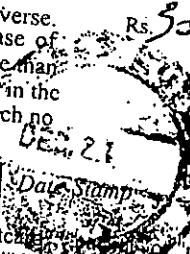
Insured for Rs. (in figures)

If insured.

Insurance fee Rs.

Name and address of sender

Weight (in words) Kilo Grams



No. 1193

Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. 50 Ps.

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Initials of Receiving Officer

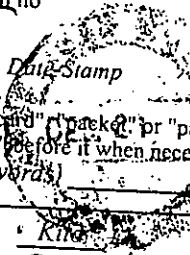
Insured for Rs. (in figures)

If insured.

Insurance fee Rs.

Name and address of sender

Weight (in words) Kilo Grams



No. 1194

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. 50 Ps.

Received a registered* addressed to

Initials of Receiving Officer

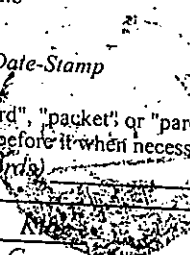
Insured for Rs. (in figures)

If insured.

Insurance fee Rs.

Name and address of sender

Weight (in words) Kilo Grams



No.

RGL58657995

Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. 50 Ps.

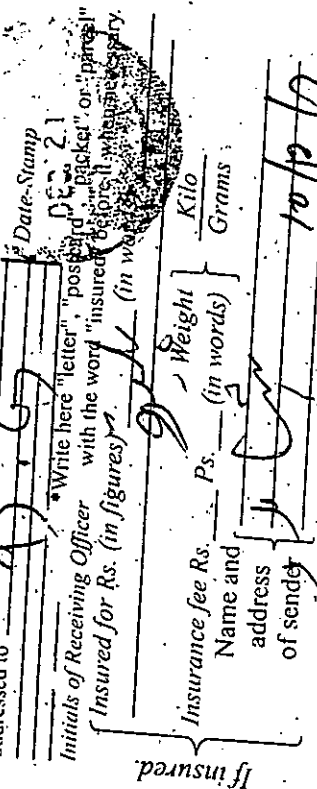
Received a registered* addressed to

Initials of Receiving Officer

Insured for Rs. (in figures)

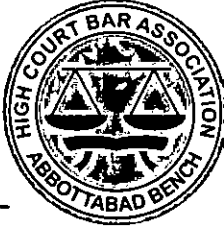
If insured.

Insurance fee Rs. Name and address of sender



HCF Reg No.	3	8	7	-	A		
BC No.	1	0	-	2	5	4	7
Place of Practice	ایسٹ آف افسر						
Name of Advocate	عبدالغفور گلزار						

(37)



S. No. 22999

وکالت نامہ

بعدالت: Before Respected High Court ATD Bench
 عنوان: Dr. Bushra Abdul Wahed Spvt. of KP & others
 منجانب: Petitioner
 نوعیت مقدمہ: Writ Petition
 باعث تحریر آنکہ:

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام Abbottabad کے لیے

Abdul Aziz Tawali & Adael Ahmed Nazir Adv / H / C

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہونا سزاوار سمجھتا ہوں اور وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہونے کا تین سو وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات میں آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عینانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونے کے۔ مجھ کو کل ساختر برداشت صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار قبول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ برحلاف کرنے سے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے پیر و نجات از کچہری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفر درخواست حکم امتناعی یا قرضی یا گرفتاری قیل از گرفتاری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ عینانہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار حاصل ہوگا کہ مقدمہ مذکور یا اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانب سے ہوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

2021/12/10 مورخہ

دن مہینہ سال

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہے۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

(Signature)

(Signature)

Dr. Bushra Abdul Wahed