


FORM OF ORDER SHEET

Court of _____

Appeal No. 473/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/04/2024	<p>The appeal of Mr. Zubair Khan resubmitted today by Mr. Aamad Nasir Kundi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 03.04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mr. Zubair Khan received today i.e. on 19.03.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Address of respondent no.3 is incomplete.
- 3- Departmental appeal having no date be dated.
- 4- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal.
- 5- The authority to whom the departmental appeal was made has not been arrayed as party.
- 6- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 629 /S.T.

Dt. 21/3/2024


21/3/24
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

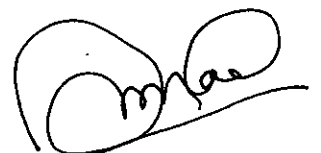
For the Registrar
High Court, Peshawar.

- 1- PPO/IGP being respondent No. 1 has deleted from list, and sub-Rule-4 of rule-6 of KP Service Tribunal Rules 1974 has fulfilled. & CCPO has made Resp No. 1 while DPO Khyber Res No. 2
- 2- Respondent No. 2 is CCPO, main police line Peshawar.
Add: Capital city Police Officer, Main Police line-Peshawar.
- 3- Departmental Appeal possesses proper date in last para. i.e. 11.12.2023.
- 4- Copies of charge sheets, statement of allegations, show cause notices, enquiry report ~~has~~ has not given by the deptl of DPO officer, Hence not available with appellant.
- 5- Objection No. 5 removed & C.C.P.O has been arrayed as respondent No. 1. while IGP has deleted.

All objections removed.

Please re-submitted.

Counsel for Appellate
Amjad Nasir Kundi



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 473 /2024

Zubair khan,..... Appellant

Versus

The *capital city police officer "CCPO" main Police line,*
Peshawar-----

Respondents

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNAL ACT

I N D E X

S.No	Description of documents	Annexure	Pages
1.	Grounds of Appeal with affidavit		1 - 8
2.	Application for condonation of delay		9 - 11
3.	Impugned order dated 01.09.2023	A	12
4.	Departmental Appeal 11.12.2023	B	13
5.	Medical record & Death Certificate	C-D	14 - 22
6.	Leave Application and appli for mand rec	E-F	23 - 25
7.	Wakalat Nama		26

Appellant

Through


Amaad Nasir Kundi
Advocate High Court, Peshawar

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Peshawar

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

Service Appeal No. 473 /2024

ZUBAIR KHAN

Ex Constable, No. 3578 District Police Khyber.

Address for the purpose of service:

Son of Habib Khan R/o Mohallah Ghari, Nawab, Rathra Malogo,
Jhaghra, Post Tarnab Form, Tehsil & District Peshawar.

..... Appellant,

VERSUS

1. Capital City Police Officer Peshawar, Police line Peshawar.
2. District Police Officer "DPO" District Khyber.

..... Respondents

Appeal under Section 4 of the KP Service Tribunal Act against the impugned Dismissal Office Order No. 6602-05/PA -/ DPO Khyber vide dated 01/09/2023 is (Annex-A) whereby he was imposed major penalty of Dismissal from Service and the same has not been issued / served / communicated properly and directly and thus, on receiving the same by unofficial means on 04.12.2023. Being aggrieved with this Dismissal order, the appellant has been duly filed Departmental Appeal / Representation dated 11.12.2023 (Annex-B) for Reinstatement in service from the date of infliction of punishment with all back benefits etc and the Respondent Authority is reluctant to pass any appropriate order, thus, the same has not been decided despite of expiry of statutory period, hence, this appeal inter alia, on the following facts and circumstantial grounds:-

=====

PRAYER

It is respectfully, prayed that on acceptance of this service appeal, the impugned office dismissal order / action / inaction / omission of the Respondent Department dated 01/09/2023 illegal, and without lawful authority thus is liable to be set aside and he may

graciously be exonerated from the charges and discharged from disciplinary proceedings.

It is therefore, further humbly prayed that the Department may kindly be issued strict direction to reinstate the Appellant from the date of infliction of punishment immediately with all back benefits and arrears of pay in the interest of justice.

Respectfully Sheweth:

1. That the appellant is a law abiding citizen of Pakistan and rendered his services to the parent department with great zeal and zest.
2. That the appellant was appointed to the post of Constable (BPS-07) w.e.f. 24.08.2017 in the prestigious disciplined force i.e. Khyber Pakhtunkhwa Police accordingly. Since inception in service, he has been performing his duties regularly with utmost devotion to the entire satisfaction of superiors. He was sent to the basic training of Police Academy w.e.f. 30.10.2021 to 01.02.2022 under the Govt. expenses.
3. That at the very outset, the father of Appellant has been suffering serious chronic disease such as **Cancer** and he was admitted many times in many hospital for treatment.

(Copy of medical record & Death certificate are Annex-C-D)

4. That the Appellant being the elder son of the family was the sole caretaker and thus, look after the father and was present with the father for 24 hours. He was on death bed during those days and subsequently expired due to such long disease on 25.10.2023.
5. That the Appellant has applied for leave which was allowed once for 03 days and he applied for more which was unanswered till now. He has been came into knowledge through reliable source about fate of such unwelcome incident herein impugned and in this regard he has been duly submitted application for provision of the entire departmental proceedings and relevant record etc.

(Copy of Application for leave & mandatory records are Annex-E-F)

6. That on the eventful days he was with his father at hospital in order to look after him and informed the high ups about this situation and pursuance to the effect, he was allowed leave and he further requests for extension which was also approved.
7. That the Respondent -Police Department has under bounden duty to intimate / inform the Appellant with regard to no sanction of leave or any other reason but they did not bother to issue / serve any such intimation. The Appellant was not received any such upset letter from the Police Department which leads to this penalty.
8. That the Police Department / Respondent was passed the harsh penalty order herein Impugned in the absence of mandatory law and without observing the procedural law which is the administration of natural justice and fair play and equity.
9. That the Appellant had visited the office of Respondent Police- Department apropos to join his duty but he was not allowed in order to collect actual and correct information deliberately and intentionally. He was not informed in respect of such harsh infliction of punishment and was kept in dark room. He requested the officials in order to furnish all the requisite documents but to no avail. Hence, this appeal.
10. There is no hope of hisrecovery apropos to better health which no one could presume regarding health. The expenses incurred on his treatment is responsibility of Appellant being sole son and after the eventuality of such unwelcome incident apropos to dismissal from service, the treatment of his lovely Papa has been discontinued and remains no longer, hence, the worthy attention of this Honorable is required. **WHO WILL RESPONSIBLE IF THE AILMENT FATHER / CANCER PATIENT, HAS BEEN NO SURVIVED DUE TO NO TREATMENT, THE STATE OR THE GOVT. ORGANIZATION**

OR THE HONORABLE TRIBUNAL OR APPELLANT OR ANY OTHER, EVER CITIZEN OF THE STATE DISCOVER TO ANSWER WHICH IS MANDATORY.

11. That the Appellant has received / collected / intimated / communicated the instant Impugned Dismissal Order through unofficial means on 04.12.2023 and hence, he immediately filed the Departmental Appeal / Representation to the Appellate Authority herein Respondent IGP for redressal of grievance which has been remained undecided thus, cause of action accrue to the Appellant from the date of receiving / knowledge / intimation / communication and the authority is reluctant to pass any appropriate order under the law hence, this appeal, inter alia, on the following grounds:

GROUND:

- A. That impugned action / inaction / omission of the respondents is apparent from the record and they are bent to deprive the appellant from the livelihood in an illegal manner which is liable to be set aside.
- B. That the impugned action / inaction of the Respondent Department amount to harsh penalty and it is prohibited under the constitution. Reliance is placed on the Art. 4, 11, 25,27,37 of the Constitution.
- C. The authority has been violated **Article 10-A** of the Constitution of Islamic Republic of Pakistan as **No Fair Trial** has been carried on and he was thus Condemned unheard. No criminal trial has been commenced, nor has formal charge been framed. Reliance is placed on the reported judgment of 2024 PLC CS 111 (Supreme Court).
- D. That the Impugned order has been received by the Appellant on 04/12/2023 through unofficial means. The same has not been properly and directly addressed to the Appellant nor such postal / courier has been made. Thus, the cause of action accrued to the appellant effective from the aforesaid date.

E. That cause of action accrues to the appellant from the date of receiving the Appellate Impugned order so communicated unofficially, hence, there is no limitation runs in such order.

2024 SCMR 24, herein it has been held that,

Ss. 39, 42, 54 & 55---Limitation Act (IX of 1908), S. 3---Gift deed---Suit for declaration, cancellation and permanent and mandatory injunction challenging the gift deed---Limitation---**cause of action**, accrual of ---Plaintiff filed his suit to challenge the gift deed 20 years after its registration---Admittedly just before filing of the suit the defendant got entered the mutation of gift in his name, on the basis of said impugned gift in the Cantonment record which gave **cause of action** to the plaintiff---Stance of the plaintiff in this situation is correct and covered the point of limitation when gift deed was first time used against him which gave him the **cause of action** ---Petitions for leave to appeal were converted into appeals and allowed and suit filed by the plaintiff was decreed.

F. That this is also settled law that in void order no limitation runs as is hold by the Supreme Court. When the basic order is void, the superstructure build thereon is also void and it would fall to the ground automatically. 2024 PLD 54 SC (E).

G. That it is the discretionary power of the court to condone the delay if there exist sufficient grounds and material available on record, hence, the instant appeal may also be condoned including limitation. 2023 SCMR 1665.

H. That no charge sheet, statement of allegations were ever served upon the appellant prior to issuance of IGFC order herein impugned office order hence, such order is void ab-initio. No regular inquiry whatsoever has been followed by the FC department on the aforesaid allegations. The appellant was not provided any opportunity to cross examine over the witness which the fundamental right of his and depriving of such privilege is against the administration of natural justice and equity. 2023 SCMR 603, 2024 PLC CS 147, 2023 SCMR 1135, 2023 SCMR 1083, 2023 SCMR 334, 2023 SCMR 866.

I. That the respondent department awarded the major penalty without any show cause notice and without following any legal procedure and the appellant has been dismissed from service which is illegal and also against law.

- 6
- J. That there is no show cause notice, no charge sheet and no personal has been given to the appellant but passed an illegal order which is against the rules and policy.
- K. That there is no recommendation from by the inquiry officer to imposed the penalty upon the appellant but the Authority has passed an ex-parte order against the appellant which is illegal and also against the norms of justice.
- L. That the impugned order lacks reason what to speak of plausible one, which goes contrary to Section 24-A of the General Clauses Act, 1897, on this score too, the impugned order is not sustainable.
- M. That the omission of holding inquiry into allegations if any, randomly relied upon for passing of the impugned order, has deprived the appellant from access to the root of allegations and from testing their veracity under the facts and law. Consequently, the appellant has been deprived of his right to fair trial and due process which include the right to inspect the written record of information taken into account for disciplinary action; right to provide own account of its rebuttal; and right to respond to evidence by cross examination. Thus, the appellant has been made to suffer in terms of his indispensable legal and fundamental rights tantamount to violation of Article 4, 9 and 10-A of the Constitution of Islamic Republic of Pakistan.
- N. That in absence of any proceedings conforming to fair trial and due process rights, the disciplinary proceedings as culminated against the appellant through impugned order/notification are not tenable under the facts and law.
- O. However, it appears from culmination of the proceedings through impugned order that it was a predesigned action to condemn the appellant with dismissal from service, reasons whereof are highly unpredictable to ascertain the fairness of the action so taken against the appellant. Otherwise, the competent authority, if not predetermined to show an exit to the appellant from the service, should have analyzed the information placed before him on the test of rationality in juxtaposition with track service record of the appellant spreading over a period of about twenty years which with the grace of Allah Almighty would have been found clean and

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particularly clear from a stain of his being absent or having a reputation of being absentee. However, the appellant was dealt with quite unsympathetically and cruelly by the competent authority.

- P. That in view of the grounds enumerated herein above made as part of this appeal/representation, the impugned disciplinary proceedings and consequent impugned order of dismissal of the appellant from service are not at all tenable under the facts and law and are liable to be reversed for the sake of justice, equity and fairness.
- Q. That the given facts and grounds being precise and specific are the least but not the last. There is a room for more grounds in support of the case advanced herein before. Therefore, the appellant reserves his right to seek permission to raise further grounds during arguments, if needed.

PRAYER

It is respectfully, prayed that on acceptance of this service appeal, the impugned office dismissal order / action / inaction / omission of the Respondent Department dated 01/09/2023 declare to be illegal, and without lawful authority thus is liable to be set aside and he may graciously be exonerated from the charges and discharged from disciplinary proceedings.

It is therefore, further humbly prayed that the Respondent Police Department may kindly be issued strict direction to reinstate the Appellant from the date of infliction of punishment immediately with all back benefits and arrears of pay in the interest of justice.

Through

Appellant


AMAAD NASIR KUNDI
Advocate High Court, Peshawar.

8

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

Service Appeal No. _____/2024

ZUBAIR KHAN..... Appellant

Versus

The Capital City Police officer "CCPO" Peshawar
and another

..... Respondents

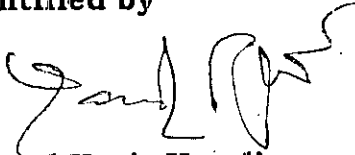
APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNAL ACT

AFFIDAVIT

I, Zubair Khan, Ex Constable, No. 3578 District Police Khyber, do hereby solemnly affirm and declare that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT


Identified by



Amaal Nasir Kundi

Counsel for Appellant

Attested
3.2024



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

MP No _____/2024

In Service Appeal No. _____/2024

ZUBAIR KHAN..... Appellant

VERSUS

The Capital City Police Officer "CCPO" Police Line
Peshawar..... Respondents

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNAL ACT

MISC. APPLICATION FOR CONDONATION OF DELAY IF ANY,

Respectfully Sheweth:

1. That the above titled Appeal is being filed before this Honorable Tribunal and the contents of which may be read as integral part of this appeal.
2. That there are sufficient causes for delaying the instant Appeal because the father of Appellant was very sick and facing severe disease and in consequence whereof he was expired thus, the Appellant due to demise death of his father, he was very mental torture and grievous upset in those days. He was not issued / served / intimated / communicated the impugned order despite of bounden duty.
3. Secondly, he visited the office for provision of such dismissal order by means of an application but could not provide the same despite of bounden duty. Be that as it may, he was also moved an application for leave which was also undecided. He was too much upset and continue the treatment of his Father by all means.
4. That the Impugned Order mentioned above with regard to Dismissal from service has been imposed and violation of law and constitution and further Impugned order which has not been communicated till now under the law and the same was received unofficially on 04.12.2023 hence, the cause of action accrue from the date of receiving / knowledge, hence, the instant appeal.
5. That the Impugned order is void ab initio, and without lawful authority hence, no limitation run against such order.

11

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2024

ZUBAIR KHAN..... Appellant

Versus

The *capital city Police officer "CCPO"* Peshawar
and another

..... Respondents

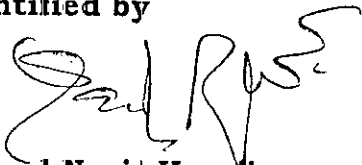
MISC. APPLICATION FOR CONDONATION OF DELAY IF ANY

AFFIDAVIT

I, Zubair Khan, Ex Constable, No. 3578 District Police Khyber, do hereby solemnly affirm and declare that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

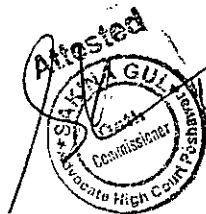
D E P O N E N T

Identified by



Amaad Nasir Kundi

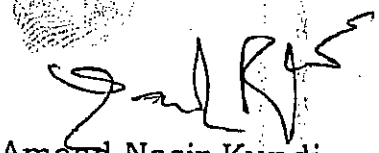
Counsel for Appellant



5. That the Impugned order is void ab initio, and without lawful authority hence, no limitation run against such order.
6. That there are fundamental rights involved therein which could be determined after submission of para wise comments and hearing of both parties at length. Mere technicality is not hurdle in way dispensation of justice. It should be decided on merit.

It is therefore, respectfully prayed that on acceptance of this application, the condonation of delay should be condoned in the interest of justice and large.

Appellant

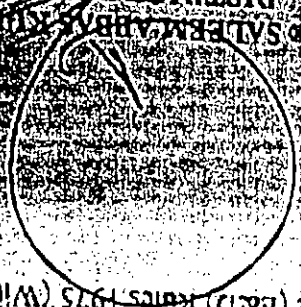


Amaad Nasir Kundi
Advocate High Court Peshawar.

Through

OH No. 878 dated 01/09/2023
No. 6682-03/PA-DPO Khyber
Copies 10

Capo. SALTER ABRAHAM
DISTRICT POLICE OFFICER
KHYBER



2014)

Dismissal from Service as per Section 4-b(iv) of Police (E&I) Rules 1975 (With Amendments -

maintain discipline in the force, hereby awards the delinquent official with Major Punishment of competent authority is satisfied about his non-interest in performance of duties and in order to Keeping in view the ongoing severe security situation, the undersigned, being the

lawful duties. It is greatly affecting the morale of other personnel.

respond to any of the notices. As per the report of SIO Mirward, he was still absent from his

22nd August 2023. However, he not only failed to respond to report to his duties but also failed to

special duties vide No. 128(A)/VASI-Khyber dated 02/08/2023 starting from 15th August 2023 to

to appear before the undersigned and report for duties. Similarly, he was directed to attend Police

dated 25/07/2023, No. 177-A/Reader, dated 01/08/2023 and No. 182-A/Reader, dated 21/08/2023

Further, he was contacted and directed multiple times vide Notice No. 166-A/Reader,

Final Show Cause Notice No. 6157/PA-DPO Khyber dated 21/08/2023.

He failed to respond to show cause notice or to report to his post concerned, he was issued with

report to his post concerned vide D.I. Entry No. 24, dated 17/07/2023 of Police Lines Khyber. As

111 Entry No. 25, dated 16/07/2023 of Police Station Mirward. He was contacted and directed to

No. 500/PA-DPO Khyber dated 25/07/2023 due to his absence from lawful duty reported vide

FC Zuhair Khan No. 3578 of District Police Khyber was issued with Show Cause Notice

DISMISSAL ORDER

Date: 21/08/2023

No. 6682-03/PA-DPO Khyber



OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER

12
A

B¹³

بخدمت جناب CCPO صاحب محکمہ پولیس خیبر پختون خواہ پشاور

عنوان:- درخواست بمراد اپیل برائے بحالی نوکری

جناب عالی! سائل حسب ذیل عرض رساں ہے:-

1. یہ کہ من سائل مسی زبیر خان ولد حبیب خان بلٹ نمبر 3578 سکندہ ملک دین خیل، عمر خان خیل، تراہ میدان ڈاک خانہ تحصیل باڑہ ضلع خیبر کا مستقل سکونتی و رہائشی باشندہ ہوں۔
2. یہ کہ من سائل محکمہ پولیس ضلع خیبر میں بطور سپاہی اپنی ڈیوٹی بمقام شاہ کس لیوی سنٹر میں احسن طریقے سے سرانجام دے رہا تھا کہ اس دوران سائل کا والد سخت بیماری (کینسر) میں مبتلا ہونے کا علم ہوا تو عارضی چھٹی لے کر گاؤں چلا گیا تو واقعی والد صاحب کافی بیمار و پریشان تھے۔
3. یہ کہ مذکورہ بالا والد صاحب کو علاج معالجہ کی عرض سے علاقہ کے ڈاکٹروں کے علاوہ کبھی پشاور شہر، نوشہرہ چارسدہ وغیرہ تو کبھی پنڈی و دیگر ہسپتالوں سے علاج کی خاطر لے جاتا تھا اور والد کی بیماری تقریباً 02 سال جاری تھا تاہم من سائل والد کے علاج معالجے کی خاطر صرف ایک ماہ اپنی ڈیوٹی سے غیر حاضر رہا۔
4. یہ کہ من سائل کے گھر میں کوئی اور شخص نہ ہے جو کہ علاج کی خاطر والد کو ہسپتال وغیرہ لے جاتے اور جو اشخاص موجود ہے یا تو چھوٹے ہیں اور کچھ معذور ہیں اور میرے علاوہ گھر کے انتظام و انصرام واسطے کوئی بالغ نہ ہے اور بڑی مجبوری کے تحت مذکورہ ڈیوٹی سے غیر حاضر رہا حالانکہ میرا قطعاً ارادہ نہیں تھا کہ اپنے گئے ہوئے رزق کولت مار کر ناشکری کرو لیکن والدین کی خدمت ہر شخص پر فرض ہے اور میں نے بھی یہ فرض نبھا کر اپنا آخرت سنوارا تاہم محکمہ پولیس نے من سائل کی مجبوری کو تہہ بالا رکھ کر مجھے اپنی نوکری سے برخاست کر دیا ہے۔
5. یہ کہ اس بابت من سائل کو کوئی قانونی نوٹس وغیرہ موصول نہیں ہوا ہے اور نہ ہی سرکاری طور سے کوئی اطلاع موصول ہو کر میرے خلاف کوئی انکوائری کا حکم دیا گیا ہو اور صرف اپنی ڈیوٹی پر واپس آنے کے بعد پتہ چلا کہ مجھے نوکری سے برخاست کیا گیا جس سے من سائل پریشان ہو کر مذکورہ مجبوری بجا زانسران و دیگر پولیس کے افسران کے ساتھ شہر کیا اور بذریعہ درخواست بوجہ مجبورہ بالا بحال کرنے کی استدعا کی تاہم وہ تا حال کوئی شنوائی نہیں ہوئی اس لئے درخواست، ہذا کی ضرورت لاحق ہوئی۔
6. یہ کہ مذکورہ نوکری سے من سائل کے گھر کا چولہا چلتا رہا کیونکہ مگر میں بڑا ہونے کے ناطے گھر کا جملہ انتظام و انصرام بہ ذمہ میرا ہے اور اب چونکہ نوکری سے برخاست ہو تو گھر کا چولہا بھی ٹھنڈا ہوا ہے اور اب کوئی اور بھی معاش زریعہ نہ ہے جس سے گھر کا چولہا چل سکے کیونکہ میرے چھوٹے چھوٹے بہن و بھائی گان بھی ہے اور وہ بھی معذرا و ان ہیں ان کے لئے میرے علاوہ کمانے والا کوئی نہ ہے

لہذا سائل آپ صاحبان سے عاجزانہ التماس کرتا ہے کہ مذکورہ بالا حقائق و مجبوری کو مدنظر رکھتے ہوئے من سائل کو اپنی ڈیوٹی پر بحال کرنے کا حکم صادر فرما کر میرا اور میرے معذور بہن و بھائی گان کا ڈھیر سارے دعائیں لے کر ممنون و مشکور فرمائیں۔ عین نوازش ہوگی۔

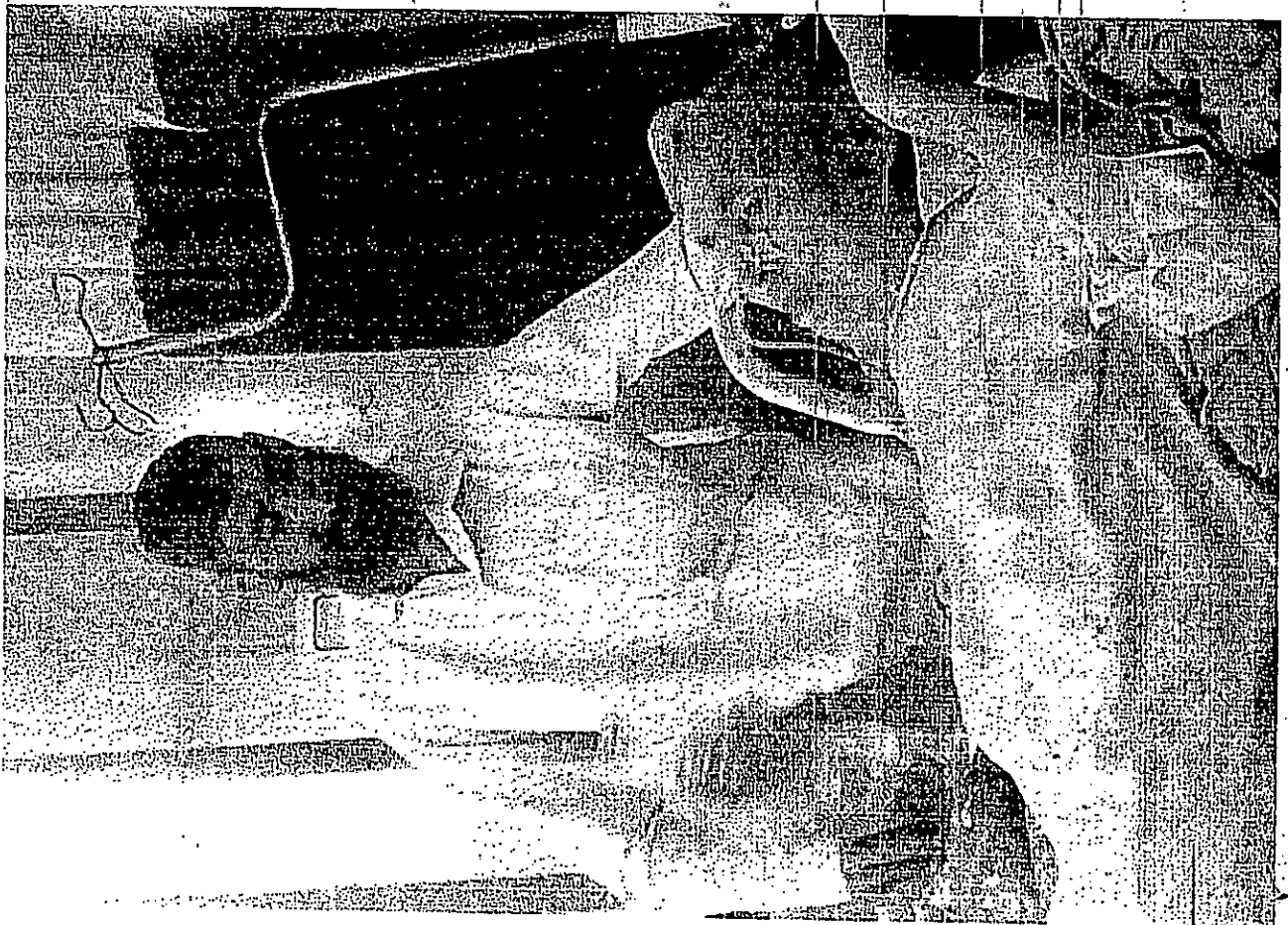
المقوم۔ 11-12-2023

دستخط

سپاہی زبیر خان ولد حبیب خان بلٹ نمبر 3578

موبائل نمبر 0333-6208589, 0315-8901857

Attested to be True
Copy



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15

Dr. Nabeed

Status: VISITING ATTENDING CONSULTANT

PRN: *10999/22*

Doctor /c:

INSTRUCTION

Kindly preserve this card and present each time when you attend the Hospital

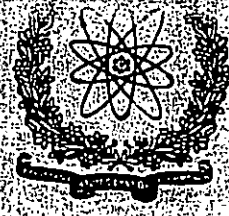
یہ کارڈ احتیاط سے رکھیں اور جب بھی ہسپتال
تشریف لائیں تو یہ کارڈ ضرور دکھائیں

ڈاکارڈ احتیاط سے رکھیں اور ہر کلمہ چھ مہینے
تہ زائے نوڈا کارڈ ضرور اوبالے

APPOINTMENT CARD

Atomic Energy Cancer Hospital

IRNUM



Institute Of Radiotherapy & Nuclear Medicine
University Campus Peshawar

Card Registration Fee
Rs 100/=

17

Operation finding/Medical History

Epigastric discomfort / IBS-C (2m)

N/V vomiting

Weakness / ABRAs + Restless

* Past medical Hx *

DM + CHC

Hospital Treatment:

20/8/22 1/2 Cannula sub.
1:00pm inj. Mergolane 10mg IV BD
2 inj. Esso 40mg IV BD

inj. Terlip 2mg IV stat
then 1mg IV QID x 72 hrs.

Arrange 30 Blood Transfusion
daily one transfer.

after 2 days CBC

Follow up after 2 weeks.

Investigation.

- | | |
|---------------|---------------------|
| 1. CBC | 2. HbT |
| 3. RBS | 4. Urine Enzymology |
| 5. Urine | 6. Creatinine |
| 7. S-Ferritin | 8. HbA1c |

DISCHARGE SUMMARY



19

Medical Record Number : K0200005786629

Name : Habib Khan

Gender : Male

Age : 63 Year(s)

Address : PESHAWAR
House # , Street # , Sector/Area Peshawar Pakistan

City : Peshawar , Pakistan

Person Phone :

Home Phone :

Admission No : K0223000105242

Admission Date : 28-AUG-2023 21:33:11

Admission Status : Emergency

Discharge No :

Discharge Date : 14-SEP-2023 09:43:28

Discharge Status : Improved

Primary Consultant : WAQAR ALAM JAN

Admitting Consultant : WAQAR ALAM JAN

Diagnosis During This Admission :

Background Medical Problem(s) (List any chronic medical conditions that the patient may have, such as diabetes mellitus, asthma, hypertension etc.):

Reason for Admission:

pain abdomen , vomiting, post op PARTIAL GASTRECTOMY

Significant Physical Findings on Admission :

HUGE INCISIONAL HERNIA

Management During Admission :

AS PER PROTOCOL

Diagnostic & Therapeutic Procedures Performed :

CONSERVATIVE MANAGEMENT

Condition at Discharge:

STABLE

Followup Instructions:

FOLLOW UP IN CLINIC

Significant Tests/Problems to Address on Followup:

Medications to Take at Home:

SR#	Medicine	Dose	Instructions	Remarks
1	Diclofenac Sodium Tablets 50 mg	1 mg	Take 1 mg tablet by mouth two times a day for 10 days	1 mg گولی روزانہ دو بار 10 دن کے لئے
2	OMEprazole Capsules 40 mg	1 mg	Take 1 mg capsule by mouth once a day for 14 days	1 mg کپسول ایک بار روزانہ 14 دن کے لئے
3	DIMEHydrinate Tablets 50 mg	1 mg	Take 1 mg tablet by mouth two times a day for 10 days	1 mg گولی روزانہ دو بار 10 دن کے لئے
4	PARAcetamol Tablets 500 mg	1 mg	Take 1 mg tablet by mouth two times a day for 14 days	1 mg گولی روزانہ دو بار 14 دن کے لئے

Instructions:

Lady Reading Hospital, MTI Peshawar

Lady Reading Hospital, MTI Peshawar. Phone: 091-9211430, Fax: -

Email: info@lrh.edu.pk, Website: www.lrh.edu.pk

DISCHARGE SUMMARY

Medical Record Number: K020002666744

Name : Habib Ullah

Sex : Male

Age : 58 Year(s)

Address : House # , Street # , Sector/Area Peshawar Pakistan

City : Peshawar , Pakistan

Person Phone :

Home Phone :

Admission No : K0222000104646

Admission Date : 12-SEP-2022 10:38:37

Admission Status : Elective

Discharge No : 22000103076

Discharge Date : 29-SEP-2022 13:03:51

Discharge Status : Improved

Primary Consultant :

Admitting Consultant : WAQAR ALAM JAN

Diagnosis During This Admission :

Background Medical Problem(s) (List any chronic medical conditions that the patient may have, such as diabetes mellitus, asthma, hypertension etc.):

Reason for Admission:

CA Stomach

Significant Physical Findings on Admission :

CA Stomach

Management During Admission :

GASTRO JEI DONE

REFER TO IRNUM FOR MANAGMENT.

Diagnostic & Therapeutic Procedures Performed :

Nil

Condition at Discharge:

STABLE

Followup Instructions:

tab augmentin 2 gm 1+1

tab tramal p 1+1 for 6 DAYS

CAP RISEK 40 MG OD FOR 10 DAYS

SUP DUPHALAC 2+2+2 FOR 5 DAYS

FOLOWUP IN SURGICAL OPD ON MONDAY AFTER 1 MONTH

Significant Tests/Problems to Address on Followup:

NIL

Instructions:

Tab Augmentin 2g 1+1 x 10 days.

Tab Tramal plus 1+1 x 6 day.

Cap Ritek 40mg

1 روزانہ صبح بخارفتہ - 4 دن کے لئے

Syrup Duphalac 1+1+1

پیشاب نرم ہونے کی صورت میں بدلتے رہیں -

ایک مہینہ بعد بروز پیر 4 مئی 2022 OPD تشریف لائیں

Lady Reading Hospital, MTI Peshawar

Lady Reading Hospital, MTI Peshawar. Phone: 091-9211430. Fax: -

Email: lrh@lrh.edu.pk, Website: www.lrh.edu.pk

DISCHARGE SUMMARY

21



Medical Record Number : K020006031591

Name : Habib Khan

Gender : Male

Age : 60 Year(s)

Address : House # , Street # , Sector/Area Peshawar Pakistan

City : Peshawar , Pakistan

Person Phone :

Home Phone :

Admission No : K0223000130272

Admission Date : 21-OCT-2023 17:16:02

Admission Status : Emergency

Discharge No : 23000119711

Discharge Date : 25-OCT-2023 07:14:10

Discharge Status : Died

Primary Consultant :

Admitting Consultant : ADIL NDAT BANGASH

Diagnosis During This Admission :

Background Medical Problem(s) (List any chronic medical conditions that the patient may have, such as diabetes mellitus, asthma, hypertension etc.):

ca stomach

Significant Physical Findings on Admission :

ca stomach

Management During Admission :

conservative management

Diagnostic & Therapeutic Procedures Performed :

conservative management

Lady Reading Hospital, MTI Peshawar

Lady Reading Hospital, MTI Peshawar, Phone: 091-9211430, Fax: --

Email: info@lrh.edu.pk, Website: www.lrh.edu.pk

DEATH CERTIFICATE

D 22



Decedent:

MR No. KO200008031591
Patient Name: HABIB KHAN
Father Name: HAZRAT KHAN
Mother Name: RABIA BIBI
Date of Birth: 21-OCT-1963
NIC Number: 11111-1111111-1
Address: House #, Street #, Sector/Area Peshawar Pakistan

Sex: Male
Age: 60 Year(s)
Marital Status: Married
Religion: Islam
Passport No: (If non-Pakistani)

Original

Phone #:

Pronouncing Physician Only:

Place of Death: Surgical-D Area

Date & Time Of Death: 25-OCT-2023 00:00

Physician Pronouncing Death: WAQAR J. AM JAN

To the best of my knowledge, death occurred at the time, date and place stated.

(Signature and Title)

Cause of Death:

Part-I. Enter the disease, injuries or complications that caused death. Do not enter the mode of dying, such as cardiac or respiratory arrest, shock or heart failure.

Immediate Cause (a) low blood pressure

(Final disease of condition resulting in death)

Sequentially list of conditions, if any, leading to immediate cause: (b) low spo2 (disease or injury that initiated events resulting in death). (c) ca stomach

Part-II. Other significant conditions contributing to death in: not resulting in the underlying cause.

CARDIAC ARREST

Was autopsy done: NO

Certifier:

Check only one

Certifying Physician (Physician certifying cause of death when another physician has pronounced death)

To the best of my knowledge, death occurred due to the cause(s) and manner as stated.

Pronouncing and Certifying Physician (Physician both pronouncing death and certifying to cause of death)

To the best of my knowledge, death occurred due to the cause(s) and manner as stated.

Certifying Physician: WAQAR J. AM JAN

(Signature and Title)

Dead body and Death Certificate Disposition:

The undersigned certifies that I have received the dead body of the above mentioned deceased patient along with the Death Certificate (in original) from Lady Reading Hospital, MTI Peshawar. I also certify that I am the next of kin of the deceased.

Name: AZIZ UR RAHMAN

Relation: NEPHEW

NIC(Number): 13101-0849752-9

Foreign Identification document and number:

(Signature / Thumb Impression)

WITNESS (Other than the Hospital Staff):

Handing Over Date & Time: 25-OCT-2023 07:05

Witness: MATI ULLAH

Witness NIC: 21201-1880261-3

Foreign Identification document and number:

(Signature / Thumb Impression)

3 day only -

Allowed

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