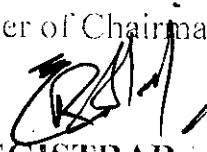


FORM OF ORDER SHEET

Court of _____

Appeal No. 684 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/05/2024	<p>The appeal of Mr. Saada Ullah presented today by Mr. Asad Zeb Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 23 .05.2024. Parcha Peshi given to the counsel for the appellant .</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 684 /2024

SAADA ULLAH _____ Appellant

Versus

INSPECTOR GENERAL PRISON & ANOTHER

_____ Respondents


INDEX

S.No.	Particulars	Annexure	Page Nos.
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3.	Addresses of Parties		6
4.	Copy of appointment order dated: 05-08-2022	A	7
5.	Copy of medical prescriptions	B	8-19
6.	Copy of impugned order dated: 16-10-2023	C	20
7.	Copy of first departmental appeal	D	21
8.	Copies of 2 nd appeal dated: 19-01-2024 & application dated: 15-03-2024	E-F	22-23
9.	Copy of appeal dated: 02-04-2024	G	24
10.	Copy of impugned order dated: 18-04-2024	H	25-26
11.	Wakalatnama		27

Dated:-16/05/2024

Through


Appellant


ASAD ZEB KHAN
Advocate High Court, Peshawar
Off: 202, 2nd Floor, City Gate Plaza, G.T.
Road, Peshawar
0346-9800565

①

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR**

Service Appeal No. 684 /2024

Saada ullah S/O Inam ud Din, Ex-Warder Central Prison Mardan, R/O
Gararo, P/O Wari, Tehsil Wari District Upper Dir _____ Appellant

Versus

1. **Inspector General of Prison, Khyber Pakhtunkhwa, Peshawar.**
 2. **Superintendent Circle Headquarters, Prison, Mardan.**
- _____ Respondents

**SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER
OF RESPONDENT No. 1 WHO DISMISSED THE APPEAL
OF APPELLANT VIDE ORDER DATED: 18-04-2024 AND
AGAINST THE IMPUGNED ORDER OF RESPONDENT
No. 2 WHO VIDE ORDER DATED: 16-10-2023 REMOVED
THE APPELLANT FROM SERVICE.**

PRAYER IN APPEAL:

**ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED
ORDERS DATED: 18-04-2024 & 16-10-2023 MAY KINDLY
BE SET ASIDE, RESULTANTLY APPELLANT MAY
KINDLY BE RE-INSTATED IN SERVICE WITH ALL
BACK BENEFITS.**

Respectfully Sheweth:

The appellant most humbly presents his grievances as under:-

1. That appellant was appointed as Warder BPS-07 and was posted at Central Prison Mardan vide order dated: 05-08-2022.

{True copy of appointment order is attached,
as mark Annex-A}
2. That appellant after his appointment, served at central prison without any complaint from his superiors, having unblemished service record on his credit.

(2)

3. **That** due to some medical issues and mental issues, appellant was taken by his elders to a hospital and he was advised by the authorized medical practitioner to have some rest from time to time, as he visited various medical practitioners at Wari as well as at Peshawar.

{Copy of medical prescriptions are attached, as mark Annex-B}

4. **That** due to the illness, respondent No. 2 issued the impugned order dated: 16-10-2023 vide which appellant was removed from service. Needless to mention that neither any notice was served upon the appellant nor any other step under the law was taken before issuing the impugned order, hence no legal and codel formalities have been followed by the respondent No. 2.

{Copy of impugned order dated: 16-10-2023 is attached, as mark Annex-C}

5. **That** after completing bed rest, when appellant visited the respondent No. 2 for resumption of his duties, he was informed about the impugned order referred above. So he filed appeal through proper channel to respondent No. 2 for onward transmission to the higher authority.

{Copy of first appeal is attached, as mark Annex-D}

6. **That** when no action was taken by the respondent No. 2, he again submitted another appeal on 19-01-2024, but the same was also not entertained. Then on 15-03-2024, appellant submitted another application to the respondent No. 2 for sending his appeal to the respondent No. 1. But to no avail.

{Copies of appeal and application are attached, as mark Annex-E & F}

7. **That** on 02-04-2024 appellant directly submitted an appeal to the respondent No. 1 and to the utmost shock and dismay of appellant, the appeal of appellant was dismissed by the respondent No. 1 vide impugned order dated: 18-04-2024.

{Copy of impugned order dated: 18-04-2024 is attached, as mark Annex-G}

8. **That** appellant feeling dissatisfied and aggrieved from the impugned orders, actions and inactions of the respondents, having no other alternate and adequate remedy is invoking the jurisdiction of this august tribunal on the following grounds inter-alia:-

GROUND:

3

- A. **Because** the impugned orders, actions and inactions of the respondents vide which he has been removed from service & his departmental appeal is rejected is against law, facts and in utter disregard of the material available on record, hence the same is untenable.
- B. **Because** neither any charge sheet is issued nor statement of allegation is served upon the appellant which is against the settled provision of service law.
- C. **Because** neither any notice for absence is issued nor served upon the appellant.
- D. **Because** appellant has served the department with great zeal, devotion and to the entire satisfaction of respondents, having no blemished record, so taking such a harsh step is unwarranted.
- E. **Because** respondents failed to consider the medical condition of appellant, as his absence was not willful but due to the advice of authorized medical practitioners.
- F. **Because** it has been clear from the record of the case that E & D rules have blatantly been violated while dealing with the case of appellant.
- G. **Because** no chance of personal hearing was given by the respondents while dealing with the rights of the appellant in service and the whole episode was done in a cursory manner, which is alien to the norms of justice.
- H. **Because** the appellant was condemned unheard while imposing major penalty upon him, hence the impugned orders are against the service laws and rules.
- I. **Because** the appellant had been made victim of discrimination, demerits, partiality and favoritism without any just and reasonable cause thereby offending the fundamental rights of the appellant as provided by the constitution of 1973, hence the impugned orders detailed above are liable to be set at naught.
- J. **Because** the respondents in utter disregard to the principles of the fairness, merit and transparency, passed the impugned orders which are against the law, illegal, unlawful and void ab initio and liable to be turned down.
- K. **Because** the appellant is very hardworking and punctual in his duty, therefore, no complaint received by the Respondents against the appellant but the Respondents proceeded against the appellant by ordering his removal

(4)

from service, which is against the law and fundamental rights of the appellant.

- L. Because the present impugned orders are illegal, illogical, against facts, without jurisdiction and suffering from material irregularity, hence they are untenable and liable to be struck down.
- M. Because the Respondents erroneously exercised their powers against judicial principle and have passed the impugned orders and opened a new Pandora box in clear violation of Service law, hence, the said impugned orders are liable to be set aside, and the appellant may kindly be re-instated in service with all back benefits.
- N. Because the impugned action and inaction on the part of respondents is against the directions of Hon'ble Superior Courts of Pakistan, given in plethora of verdicts.
- O. Because the appellant craves for leave to add further grounds at the time of oral arguments before this Hon'ble Court highlighting further contraventions of the provisions of the Constitution which adversely affected the appellant.

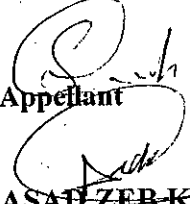

PRAYER

In view of the above, it is humbly prayed that this Hon'ble Tribunal may graciously be pleased to:

- (I) Set aside the impugned order dated: 18-04-2024 of respondent No. 1 (who dismissed departmental appeal of the appellant) being illegal, unlawful, void ab initio and against the settled provisions of law.
- (II) Set aside the impugned order dated: 16-10-2023 (vide which respondent No. 2 removed the appellant from his service) being illegal, unlawful, void ab initio and against the settled provisions of law.
- (III) Re-instate the appellant into service from the date of removal from service with all back benefits.
- (IV) Any other relief deemed appropriate in the circumstances, not specifically for, may also be given to the appellant.

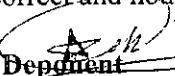
Dated: 16-05-2024

Through


Appellant

ASAD ZEB KHAN
Advocate High Court, Peshawar.

VERIFICATION:

It is verified that all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.


Respondent

Note: That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

5

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR**

Service Appeal No. _____/2024

SAADA ULLAH _____ **Appellant**

Versus

INSPECTOR GENERAL OF PRISON & ANOTHER

_____ **Respondents**

AFFIDAVIT

I, Saada ullah S/O Inam ud Din, Ex-Warder Central Prison Mardan, R/O Gararo, P/O Wari, Tehsil Wari District Upper Dir, do hereby solemnly affirm and declare on oath that all the contents of the accompanying appellant are true and correct to the best of my knowledge and belief and nothing has been kept concealed intentionally from this Hon'ble Tribunal.

Identified By:

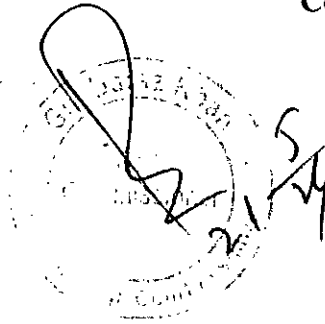

ASAD ZEB KHAN

Advocate High Court, Peshawar.


Deponent

CNIC# 15 702-9297184-7

Cell# 03423166606



6

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR**

Service Appeal No. _____/2024

SAADA ULLAH _____ **Appellant**

Versus

INSPECTOR GENERAL OF PRISON & ANOTHER

_____ **Respondents**

ADDRESSES OF THE PARTIES

**Saada ullah S/O Inam ud Din, Ex-Warder Central Prison Mardan, R/O
Gararo, P/O Wari, Tehsil Wari District Upper Dir _____ Appellant**

Versus

- 1. Inspector General of Prison, Khyber Pakhtunkhwa, Peshawar.**
- 2. Superintendent Circle Headquarters, Prison, Mardan.**

_____ **Respondents**

Dated: 16-05-2024

Through


APPELLANT


ASAD ZEB KHAN
Advocate High Court, Peshawar



7

No. _____ /PB Dated: 05/08/2022

OFFER OF APPOINTMENT

Upon recommendation of the Departmental Selection Committee, the below noted candidates are hereby appointed against the post of Warders (BPS-07) in the Khyber Pakhtunkhwa Prisons Department in Basic Pay Scale Rs. (16310-910-43610) plus other usual admissible allowances on the following terms and conditions:-

S#	Name	Father Name	Domicile	Place of Posting
01	Muhammad Naccm	Fazle Subhan	Mardan	Central Prison Mardan
02	Syed Junaid Ali Shah	Syed Anwar Shah	Mardan	Central Prison Mardan
03	Raheel Ahmed	Fida Muhammad	Mardan	Central Prison Mardan
04	Saada Ullah	Inam Uddin	Dir Upper	Central Prison Mardan
05	Aamer Sohail	Habib Shah	Mardan	Central Prison Mardan
06	Zakir Hassan	Gul Hassan	Dir Lower (Timergara)	Central Prison Mardan
07	Amir Hamza	Ali Akbar	Mardan	Central Prison Mardan
08	Saleem Saif Ullah	Abdul Zafar	Chitral Lower	Central Prison Mardan
09	Usman Ghani	Muhammad Ghani	Dir-Lower (Timergara)	Central Prison Mardan
10	Intekhab Alam Khan	Anwar Khan	Dir-Upper	Central Prison Mardan

TERMS & CONDITIONS


- 1- Their appointment will take effect from the date of joining duty at their place of posting.
- 2- Their appointment is purely temporary and their services are liable to be terminated at any time on 15 days' notice without assigning any reasons.
- 3- No TA/DA will be admissible to them for joining first appointment.
- 4- In case they wish to resign at any time they will give one month notice OR in lieu thereof one month's pay will be forfeited from them subject to the discretion of the competent authority in public interest and will leave the service after acceptance of their resignation.
- 5- Their appointment is subject to Medical fitness from Government Service Hospital.
- 6- They will be eligible for continuance on the post if their work and conduct remained satisfactory during the period of their temporary appointment provided the vacancy against which they have been appointed continues.
- 7- They will be on probation for a period of one year extendable up to another year. During probation period their services will be terminated if their work and conduct is not found satisfactory OR the vacancy ceases to exist.
- 8- They will be liable to serve anywhere in the Prisons Department of Khyber Pakhtunkhwa.
- 9- For all other purposes such as Pay, T.A and Medical Attendance etc; they will be governed by such Rules as may be issued by the Government for the category of Government Servants of the Prisons Department to which they will belong.
- 10- They will be governed by the Khyber Pakhtunkhwa Government Servants (Conduct) Rules 1987, the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules 1986, the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the Khyber Pakhtunkhwa (E&D) Rules, 2011 the Khyber Pakhtunkhwa Prison Department Service Rules and all other rules / regulations framed or to be framed by the Government from time to time.
- 11- Their service will be liable to termination / reversion at any stage if their Academic Certificates / Degrees (if any), CNIC, Domicile etc; are found fake, their services will be considered as terminated automatically and FIR will be lodged against them.
- 12- Their salary will be released after making proper verification of their antecedents/ character roll, Domicile, and Academic Qualification Certificates / Degrees etc; from the quarter concerned by the jail of their first posting. Moreover, if any verification charges are involved on this account, the same will be paid by the appointee.
- 13- If they accept the appointment on the above cited terms and conditions, they should report to the **Superintendent Central Prison Mardan** within 30 (Thirty) days of the receipt of this offer of appointment at their own expense. In case they fail to join duty within the same period, the offer of appointment will be treated as cancelled /withdrawn.

Endorsement No: 3586-89/-

Copy of the above is forwarded to:-

- 1- The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar for information, please.
- 2- The Superintendent Central Prison Mardan for information. On arrival of the above named appointees, an undertaking should be taken on judicial stamp paper from them to the effect that they have accepted all terms and conditions contained in the offer of their appointment and submitted to Headquarters office for record.
- 3- The District Account Officer Mardan for information & further necessary action.
- 4- Appointee concerned.

SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN


SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME _____

YEARLY NO. _____

DATE _____

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME (5702 9297 184 -)

YEARLY NO. _____

DATE 09/3/75

DISEASE 27/P

FACE VALUE RUPEES 10/ FACE VALUE RUPEES 10/-

8

B

BH
SIP

NP
JCT

R

Tab xtm CR

02-5-1/07 x 70 1/2 12.5
05-1- x 70 1/2

Integral 10
x 10 1+1

J

Registered



9

OFFICE OF THE SUPERINTENDENT CIRCLE HQS. PRISON MARDAN

No. 2411 /PB Dated: 08/09/2023, E-Mail: mardanjail@gmail.com, 0937-843114


To

✓ **Warder Saada Ullah S/O Inam Ud Din,**
R/O Village Umrli Bala Post Office & Tehsil Wari,
District Dir Upper.

Subject: **ABSENCE NOTICE.**

As communicated by the Superintendent Central Prison Mardan dated 07.09.2023, you were granted two (02) Nights Bachat on 14.08.2023 and were required to resume duty on 16.08.2023. But you failed to resume duty on 16.08.2023 and remained absent from 16.08.2023 to 18.08.2023 for three (03) days. On 23.08.2023 medical certificate/rest for eight (08) days receive in this office through registered post issued by "Category "C" Hospital Wari OPD" w.e.f 19.08.2023 to 26.08.2023 without countersigning from Medical Superintendent/Civil Surgeon. Again you failed to resume your duty on 27.08.2023 and you are still absent from duty without any information to this office. You absented yourself from duty as well as jail premises without permission and sanction of leave from the competent authority on 27.08.2023 and is absent up to date thus violating of the Khyber Pakhtunkhwa Prison Rules 2018.

You are therefore directed to report to Superintendent Central Prison Mardan within fifteen (15) days of the receipt of this Notice and explain then reasons of your absence otherwise strict disciplinary action will be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011.

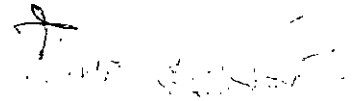

SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN
8/9/23

Endst. No: _____/. Dated: ___/09/2023.

Copy of the above is forwarded to:-

- 1- The Inspector General of Prison Khyber Pakhtunkhwa, Peshawar for information please.
- 2- The Superintendent Central Prison Mardan for information with reference to his report dated. 07.09.2023, please.

SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN



10

Govt. Category C Hospital Wari

Health Department Du Hoger

Category C Hospital Wari

Siddhanta

Name: _____

Test: _____

16/2
23/11

Test	RESULT	NORMAL RANGE	Test	RESULT
CHEMISTRY			CHEMISTRY	
HB	12.5	M13-18/F11.5-16.5g/dl	Blood Sugar (F)	
TLC	14,500	4000-11000/C mm ³	Blood Sugar (R)	
ESR		0-15mm/1st hr	S. Erythroin Total	
Platelets Count	1,97,000	1,50,000-4,50,000/cmm	S. Erythroin Direct	
			S. Erythroin Indirect	
Neutrophils	55	40-75%	SGPT	
Lymphocytes	12	20-40%	S. Urea	
Monocytes	31	00-09%	S. Creatinine	
Eosinophils	02	00-06%	ALP	
Smear For Hsp			SIGMA	
URINE R/E			S. Cholesterol	
Sugar			S. Uric Acid	
Alb			STAT	140 USP
W/B EXAMINATION			TO	
RBC			R/PF TH	
WBC			R/PF	
Cast			R/PF	
Ca. Oxid			R/PF	
Epithelial Cells			R/PF	
ICT FOR TIT			ICT FOR TIT	
ICT FOR TR			IgG:	
PREGNANCY TEST			IgM:	
HBE AG			Blood Group:	
ICP			Rh factor:	
ASD			ICT FOR TR	
ICP				
ICP				
CRP				

Remarks: _____

[Signature]
I/C Signature

(11)

Category "C" HOSPITAL WARD OUT PATIENT DEPARTMENT

Date & Time : 16 Aug, 2023 11:50 AM

Patient Name	: SADAM ULLAH	Gender	: Male
Address	: Wari	Receipt #	: M-23-83403
Shift	: Morning	Age	: 27 year 1/2
Type	: OPD		: 570292971891

Investigation

4c
- Fever
- cough
- SOB

Pass in line
- 2 Sam 2g
by D. Cadroo

(A) lower zone crackles

Tabs provided
(i) (ii) (iii)

RTI
Pneumonia

AE
- CBC
- X-Ray
- CRP (USG)

Tub Fife 120
- sup. (off)
- Advice
- Bedrest
- For two weeks

Medical Officer
Wari District Hospital

Doctor Sign

*

Consultant Gastroenterologist & Hepatologist
Dr. Wajid Iqbal

MBBS (Gold Medalist) KMC Peshawra
 MCPS (Medicine)
 FCPS (Gastro) Aga Khan Hospital Karachi
 MRCP (UK) MACG (USA)
 PMDC No#: 21402N
 Senior Registrar Timergara Teaching Hospital



Not Valid for Court

(12)

کنسلٹنٹ گیسٹرو انٹرا ویسٹ اینڈ ہیپاٹالوجسٹ
ڈاکٹر واجد اقبال

ایم بی بی ایس (گولڈ میڈلسٹ) کے ایم سی (پشاور)، ایم سی پی ایس (میڈیسن)
 ایف سی پی ایس (گیسٹرو) آغا خان ہسپتال کراچی
 ایم آئی پی ایس (یو کے)، ایم اے سی پی (امریکہ)
 سینئر رجسٹرار ٹیمرگرا ٹیچنگ ہسپتال

Name Sanda ulah Age 24 Sex F Add Timergara Date 12/2/21

exp. part
 → Nausea

Bom par

prod. cough → 2 weeks

Breast: NO. M. U.

Sleep: NO. M. U.

ORL B.P. = 120/80

Adv

CBC SUPP

ST on Hospital

1. CAP NEXUM 40

2. TAB LEBLET SW

3. TAB SILVORID 50

4. TAB CACION 100

5. TAB NUTRIZEL

ماہر امراض: معدہ، جگر، پرتقان، گیس، شوگر، بلڈ پریشر

0302-8523642

بروز جمعہ اور اتوار: امین سرجیکل ہسپتال واڑی پائین

0305-2021290

بروز ہفت: ارمان پلازہ واڑی بالا

پشاور میڈیکل لیبارٹری

Mr. Aurang Zeb

Mr. Farid Ullah

Lab Teach THQ Hospital Wari
DMLT (PESHAWAR)

Lab Teach THQ Hospital Wari
DMLT (SWAT)

No.HCCR6152022

ADD: ARMAN PLAZA NEAR CAT D HOSPITAL WARI 03052021290

PATIENT NAME:-SADA ULLAH

DATE:-19/08/2023

TEST REQUIRED:-CBC / ALT / STOOL H.PYLORI /

REFERRED BY:- DR WAJID IQBAL SB Gastroenterologist

<u>Test</u>	<u>Results</u>	<u>Normal</u>
Haemoglobin	13.9 g/dl	F 12.0 – 16.0 M 14.0 – 18.0
WBC Count	4,100/cmm	4,000 – 11,000
Platelet Count	2,00,000/cmm	150 – 450,000
Total RBC Count	4.78 mill cells/mcL	M 4.7 – 6.1 F 4.2 – 5.4
Hematocrit (PCV)	40.4 %	M 42.0 – 52.0 F 35.0 – 47.0
MCV	90.8 fl	80 – 100
MCH	29.2 pg/cell	27 – 32
MCHC	32.1 g/dl	33 – 36
Diff Leucocytes Count (DLC)		
Neutrophils	65 %	60 – 70
Lymphocytes	30 %	20 – 40
Monocytes	03 %	02 – 06
Eosinophils	02 %	01 – 04
SGPT (ALT)	40 U/L	Up to 45
STOOL H.PYLORI :-	NON REACTIVE	

[Handwritten Signature]



(14)



Dr. Muhammad Tariq Mehr

MBBS (Pesh), MCPS (Med), FCPS (Med), MRCP II (UK)

Consultant Medical Specialist

Associate Professor Medicine

Hayatabad Medical Complex Peshawar.



Clinic: B-217, Ibrahimi Hospital, Dabgrai Gardens, Peshawar Mobile: 0321-9758882

SAAD

① FRANK PAIN
② LUTS.

1/ LUCID

500

②

1+1

2/ RIMATHAN

50

⑤

1+1

MDD

GAS

ABDO

120/80

3/ OLANZO E

3/25

①

1/1

4/ SPACHULA HORSE

②

1/1, 2/2

5/ RECOMMENDED SICK

LEAVE FOR FIVE DAYS

کلینک: B-217، ابراہیمی ہسپتال

ڈبگری گارڈنز پشاور

0321-9758882

PMDC-10435-N

②

Not Valid For Medico Legal Purposes

میڈیکل سپیشلسٹ

ڈاکٹر محمد طارق مہر

ایسوسی ایٹ پروفیسر میڈیسن حیات آباد میڈیکل کالج پشاور

Jamel Doppler Ultrasound Clinic



Name: Saad	Ref by: Dr. Muhammad Tariq
Patient I.D: 41	Date: Friday, February 03, 2023

Abdominal Ultrasound Findings

Liver: Normal size having homogenous parenchymal echo pattern with no evidence of sonographically detectable focal mass lesion.

No evidence of Extra/intra hepatic billiary channel dilatation.

Portal vein and **CBD** measuring within normal limits.

Gall Bladder: Normal in volume and wall thickness, no sludge, stone or sign of inflammatory changes noticed.

Spleen: Normal in size with uniform echo texture.

Pancreas and Para aortic region are obscured by overlaying bowel gases.

Right kidney is normal size, shape and echogenicity no evidence of stone /hydronephrosis.

Left kidney is normal size and echogenicity shows tiny concretions with minimal pelvi-calyceal dilatation.

No intraperitoneal free fluid seen.


Pelvic Ultrasound Findings

Urinary Bladder is normal with normal wall thickness. No stone /diverticular lesion seen.

Prostate is measuring up to normal limits.

> Impression

- Left renal tiny concretions with minimal pelvi-calyceal dilatation


 Ultrasound specialist
 Dr. Muhammad Riaz
 Member of Jefferson University America

Error and omission of the typing is regretted

**Add: Khattak Medical Center Ground Floor Dabgari
Garden Peshawar. Ph: 0346-9017815**



Al-Ibrahimi Laboratory

16

Dr. Hanif

AL IBRAHIMI
LABORATORY

Page 1 of 1

Reg. No.: 154632	Ref. By: 14
Name: SAAD	Gender: Male
Age: 24 Years	Lab. No.: 27507
Date: 03/02/2023 03:35 pm	Result #: 14865
Doctor: Dr. Tariq Meher	

Test	Result Value	Unit	Ref: Range	Remarks
FBC/ESR				
Hemoglobin	13.5	g/dL	(14 - 18)	Low
TLC	8100	/cmm	(4000 - 11000)	Normal
DIFFRENTIAL COUNT				
Neutrophils	88	%	(40 - 70)	High
Lymphocytes	10	%	(20 - 40)	Low
EOSINOPHILS	01	%	(1 - 6)	Normal
MONOCYTES	01	%	(02 - 10)	Low
ESR				
ESR	35	mm/hour	(05 - 15)	High
Platelets Counts	253000	/cmm	(150000 - 450000)	Normal

Lab Incharge

INCORRECT RESULT? Please Call Laboratory within 24 hours for a Free REPEAT



Ground Floor, Al-Ibrahimi Hospital, Dabgari Garden Peshawar, Pakistan

alibrahimihospital@gmail.com

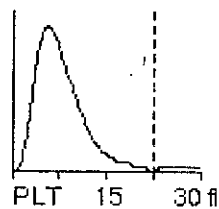
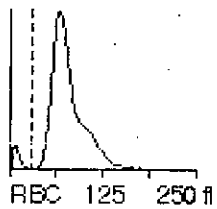
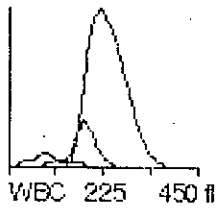
+ 92 91 2565776
+ 92 91 2567448/9

(17)

ID 1: 14
ID 2:
Seq.: 5409
Date: 2023-02-03
Time: 02:26
Prof.: Blood
Asp.: Open Tube
Oper.:
Notes:

WBC	8.1		$10^9/l$
LYM	0.4	▼	BD $10^9/l$
LYM%	5.0	▼	BD %
MID	0.5		BD $10^9/l$
MID%	6.7		BD %
GRA	7.2		BD $10^9/l$
GRA%	88.3	▲	BD %
HGB	13.5		g/dl
MCH	31.2		pg
MCHC	39.2	▲	g/dl
RBC	4.33		$10^{12}/l$
MCV	79.7		fl
HCT	34.5	▼	%
RDW _a	51.3		fl
RDW%	12.2		%
PLT	253		$10^9/l$
MPV	7.7		fl
PDW _a	11.8		fl
PDW%	41.4		%
PCT	0.19		%
P-LCR	12.6		%
P-LCC	31		$10^9/l$

Handwritten notes:
5/2
10/8
2/10
E. coli
M. OI



Handwritten mark:



12

Dr. Hanif



Reg. No.: 154632	Ref.By: 14
Name: SAAD	Gender: Male
Age: 24 Years	Lab. No.: 27507
Date: 03/02/2023 03:35 pm	Result #: 14865
Doctor: Dr.Tariq Meher	

Test	Result Value	Unit	Ref: Range	Remarks
RBS				
RBS	140	mg/dl	(70 - 150)	Normal

Lab Incharge _____

INCORRECT RESULT? Please Call Laboratory within 24 hours for a Free REPEAT



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Garden Peshawar, Pakistan

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19

Dr. Hanif

Reg. No.: 154632		Ref. By: 14	
Name: SAAD		Gender: Male	
Age: 24 Years		Lab. No.: 27507	
Date: 03/02/2023 03:35 pm		Result #: 14865	
Doctor: Dr. Tariq Meher			

Test	Result Value	Unit	Ref. Range	Remarks
URINE R/E				
PHYSICAL EXAMINATION				
Volume	15	ml	(10 - 15)	Normal
COLOUR	YELLOW	0		
CHEMICAL EXAMINATION				
PH	ACIDIC			
SUGAR	NIL			
PROTEINS	NIL			
MICROSCOPIC EXAMINATION				
PUS CELLS	03----05	HPF		
RED BLOOD CELLS	04----06	HPF		

Lab Incharge

INCORRECT RESULT? Please Call Laboratory within 24 hours for a Free REPEAT



Ground Floor, Al-Ibrahimi Hospital, Dabgari Garden Peshawar, Pakistan

alibrahimihospital@gmail.com

+ 92 91 2565776
+ 92 91 2567448/9



OFFICE OF THE SUPERINTENDENT CIRCLE HQS. PRISON MARDAN

No. _____ /PB Dated: ___/10/2023, E-Mail: mardanjail@gmail.com, 0937-843114

OFFICE ORDER

WHEREAS, the accused official/ Warder Saada Ullah S/O Inam Ud Din attached to Central Prison Mardan was proceeded against under Rule-3 read with rule 9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his wilful absence w.e.f 27.08.2023, and absence notice was served upon at his home address vide this Headquarters letter No. 2411/PB dated. 08.09.2023.

AND WHEREAS, due to no response from him, another notice was published in the leading newspaper of the Province, Daily "Pakhtunkhwa News" Mardan on 29.09.2023 and Daily "Aaj" Peshawar on 29.09.2023 as provide under the rules ibid.

AND WHEREAS, the accused official / Warder failed to resume duties till date as reported by the Superintendent Central Prison Mardan vide his report dated 16.10.2023.


NOW THEREFORE, in exercise of powers conferred under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the undersigned being competent authority after observing all legal procedural formalities, hereby awarded the Major Penalty of "**Removal from Service**" with immediate effect to the accused official/ Warder Mr. Saada Ullah S/O Inam Ud Din attached to Central Prison Mardan for his wilful absence w.e.f 27.08.2023, he is not entitled for any remuneration for the absence period under rule 19 of the Khyber Pakhtunkhwa Government Servant Revised Leave Rules 1981.

sd
SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN

Endst: No. 2891-94 / Dated: 16/10/2023

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information, please.
2. The Superintendent Central Prison Mardan, for information and necessary action with reference to his report dated 07.09.2023, 23.09.2023 and 16.10.2023, please.
3. The District Accounts Officer, Mardan for information and necessary action please.
4. Saada Ullah S/O Inam Ud Din, R/O Village Umralli Bala Post Office & Tehsil Wari, District Dir Upper for information.


SUPERINTENDENT
CIRCLE HQS. PRISON MARDAN

116/10

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"D"

(21)

بخدمت جناب آئی جی جیل خانہ جات پشاور

عنوان:- درخواست برائے فراہمی انصاف و بحالی نوکری

جناب عالی!

گزارش کی جاتی ہے کہ فدوی مورخہ 05-08-2022 کو بحیثیت وارڈ بھرتی ہو کر ڈیوٹی سرانجام دے رہا تھا کہ اچانک فدوی اعصابی کمزوری میں مبتلا ہو کر کتنے مہینوں تک خود کو سنبھال نہیں سکا، اوکافی علاج معالجہ کے بعد فدوی صحتیاب ہوا ہے۔ بعد از صحتیابی جب سائل جناب سپرنٹنڈنٹ سنٹرل جیل مردان کے پاس گیا تو سائل کو حکم مورخہ 16-10-203 دیا گیا کہ سائل کو نوکری سے برخاست کیا گیا ہے۔ لہذا استدعا کی جاتی ہے کہ سائل کی غیر حاضری عہدہ و قصداً نہ تھی بلکہ بوجہ بیماری تھی اندر میں حالات خواستگار ہوں کہ سائل کو نوکری پر بحال کیا جائے۔

مورخہ 27-10-2023

سائل-

صدا اللہ ولد انعام الدین

ساکن:- گراڈ و عمرال بالا تحصیل واڑی ضلع اپر دیر
شناختی کارڈ: 1-1879718-9292-15702
رابطہ نمبر: 03423166606

۲

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خدمت جناب پرنسپل ڈسٹ صاحب 4/4 سیکرٹری ہلال

درخواست برائے راجسٹی

جناب عالی!

مؤدبانہ گزارش ہے

یہ کہ فدوی دوران ذیلین بعضی مشورہ میں مبتلا ہوئے ہیں
ڈیپارٹمنٹ کا شمار کیا۔

یہ کہ دوران میں ملتا ہوا کوائف کی وجہ سے فدوی خود

گتہ ذیل تک نہیں پہنچ سکے۔

یہ کہ دوران علاج فدوی سے مزید پریشان ہوئے ہیں
ان تمام حالات سے باخبر نہیں کیا۔

یہ کہ علاج معالجہ کے لیے فدوی کافی آمدنی کی ضرورت ہے
نیز ڈیوٹی کے قابل ہے۔ حکم نامہ درخواست مفوضہ ہے۔

لہذا اندرین حالات کوئی امید سے استدعا کرتا ہے
کہ فدوی سائپل کے پورے عہدہ شدہ خزانہ کی حکامات پر

نظر ثانی فرمایا جائے اور میں یہ عرض کرتا ہوں کہ ان کے بقایا

حالات مدد نظر آئے اور خزانہ کے دو سہ افراد

پر رخصت فرمایا فدوی کو ڈیوٹی پر تعینات کرانے کا حکم صادر
فرمایا۔ زبانی یہ عرض فرمادیں کہ ان کی تنگدستی کو

زبانہ آداب
علاجی فرمایا اور صاحب الشہادۃ الفاضلہ المدینہ

19.01.24

A

(23) خدمت جناب سپر سٹریٹنز میں سڑک کی تعمیر کو نام نہاد
 درخواست برائے فراہمی اسیٹ

F

ذرا - عالی:

میرا خیال ہے کہ فزوری خورد خورد سے ہو کر
 بڑھتی ہو کر سب انجام لے رہا ہے۔ یہاں تک فزوری اسی
 حالت میں جب تک ہو کر کہنے میں نہیں آتی۔ خود کو
 سنبھال رہی ہے۔ اور کافی علاج معالجہ کے بعد فزوری
 یہ کہ دوران علاج معالجہ ان تمام کاموں سے فزوری کو
 رکھا گیا ہے۔ تاکہ مزید کسی طرح پریشانی سے
 بچا جا سکے۔ اور درخواست گزار نے یہاں تک
 کیا کہ درخواست دہیں کیا گیا ہے

انہی حالت میں درخواست دہیں کیا گیا ہے کہ فزوری کے
 مادہ سے یہ درخواست Through proper channel
 گزار کر فریوارڈ کیا جائے تاکہ فزوری کے لئے
 مناسب کاموں سے فزوری کو بچا جا سکے۔ عین
 خواہش ہوگی۔

الغرض . الحمد للہ والدین کے لئے دعاؤں کے ذریعے فزوری کو
 علاج

F

بخدمت جناب آئی جی صاحب جیل خانہ جات صوبہ خیبر پختون خوا بمقام پشاور

(21)

عنوان: درخواست بمراد بحالی

جناب عالی!

مذکورہ گزارش کی جاتی ہے کہ فدوی مورخہ 05/08/2022 کو بھرتی ہوا تھا۔ اور مردان جیل میں بحیثیت وارڈر اپنی خدمات احسن طریقے سے سرانجام دے رہا تھا۔ فدوی اچانک اعصابی کمزوری اور ذہنی بیماری میں مبتلا ہو کر کئی مہینوں تک خود کو سنبھال نہ سکا اور کافی علاج معالجہ کے بعد سائیکل صحت یاب ہوا۔ (میڈیکل رپورٹ لف ہیں)۔ یہ کہ سائیکل کو بدوران معالجہ ان تمام کارروائیوں سے بے خبر رکھا گیا۔ تاکہ سائیکل مزید کسی پریشانی سے بچایا جاسکے۔ یہ کہ سائیکل نے مورخہ 19/01/2024 کو سپرینٹنڈنٹ سنٹرل جیل مردان کو دوبارہ بحالی کے لئے درخواست دی جو کہ بغیر کسی کارروائی کے واپس کر دیا گیا۔ سائیکل نے دوبارہ مورخہ 15/03/2024 کو سپرینٹنڈنٹ جیل مردان کو درخواست دی تاکہ سائیکل کی درخواست آئی جی صاحب کو فارورڈ کیا جائے۔ لیکن تاحال کوئی جواب موصول نہ ہوا۔ سائیکل انتہائی بیمار تھا جس کی وجہ سے فدوی کو Removal from service کر دیا گیا ہے۔ Removal from service آرڈر لف درخواست ہذا ہے۔

لہذا درخواست کی جاتی ہے کہ سائیکل کے بحالی کے احکامات صادر فرما کر مشکور فرمایا جاویں۔
سائیکل تاحیات دعا گور ہے گا۔

المرقوم: 02/04/2024

العارض

آپ کا تابع فرمان:

وارڈر صداء اللہ ولد انعام الدین

سکنہ عمرالی بالا تحصیل وڈا کھانہ واڑ ضلع دیر بالا۔

شناختی کارڈ نمبر: 1-15702-9297184

رابطہ نمبر: 0320-9089885

0342-3166606







ORDER:

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
☎ 091-9210334, 9210406 ☎ 091-9213445

No. Estb/Ward/Orders/ 17127 1-

Dated 18-04-2024 1-

WHEREAS, Ex-Warder Saada Ullah S/o Inam Ud Din, attached to Centra Prison Mardan was awarded the major penalty of "**Removal from Service**" by Superintendent HQs Prison Mardan vide order No. 2890-94 dated 16-10-2023 due to his willful absence w.e.f. 27-08-2023 till the date of his removal from service on 16-10-2023.

AND WHEREAS, the said Ex-Warder preferred his departmental appeal for setting-aside the penalty awarded to him, which was examined in light of the available record of the case and it was observed that the appeal is time barred and penalty was awarded to him by the competent authority due to his misconduct / willful absence after observing all legal and codal formalities as required under E&D Rules 2011.

NOW THEREFORE, keeping in view the facts on record, the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 read with Rule-05 of Khyber Pakhtunkhwa Service Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being time-barred and without any substance.

**ADDL: INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.**

ENDST: NO. 17128 -- 301-

Copy of the above is forwarded to the:

1. Superintendent, Circle HQs Prison Mardan for information and necessary action w/r to his letter No. 2890-94 dated 16-10-2023. He is directed to inform the appellant accordingly and to make necessary entry in his Service Book under proper attestation.
2. Mr. Saada Ullah S/o Inam Ud Din (Ex-Warder) C/o Superintendent Circle HQs Prison Mardan for information.
3. PS to I.G, Prisons Khyber Pakhtunkhwa Peshawar for information

DS/PE

DEPUTY DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

1032

SPAH



REGISTERED

(26)

OFFICE OF THE
SUPERINTENDENT
CIRCLE HQs PRISON MARDAN
Email. mardanjail@gmail.com.
Phone No. 0937843114
No. 1039 -WE/PB Dated: 22/04/2024


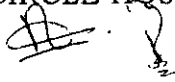
To,

Mr. Saada Ullah S/O Inam Ud Din, Ex- Warder,
R/O Village Umrli Bala Post Office & Tehsil Wari,
District Dir Upper.

Subject: **DEPARTMENTAL APPEAL.**

Memo;

It is to inform you that your Appeal regarding reinstatement into service has been considered and rejected being time barred and without any substance by the Additional Inspector General of Prisons, Khyber Pakhtunkhwa vide his order No.17127 dated. 18.04.2024. (Order attached).


SUPERINTENDENT
CIRCLE HQs PRISON MARDAN


Endst. No: _____/

Copy of the above is forwarded to the Worthy Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar for information with reference to his office order No. referred to above, please.

SUPERINTENDENT
CIRCLE HQs PRISON MARDAN.



(27)

50	391155	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈوکیٹ: اسد زبیر خان	پشاور بار ایسوسی ایشن نمبر: B.C. 91517	PESHAWAR BAR ASSOCIATION
رابطہ نمبر: 03469800565		QR Code

بعدالت جناب: سر سید بیرونل کے جی کے

منجانب: مسدود اللہ	دعویٰ:
	علت نمبر:
	مورخہ:
مسدود اللہ بنام حکومت	جرم:
	تھانہ:

بامث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ صاحب کاروائی خان صاحب کے آں مقام پر کیلئے اسد زبیر خان ایڈوکیٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق و ذریعہ پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ اس پر

استدعا
Receipt

المرقوم: 1815/2024

العبد کواحد الع
مقام:
کے لئے منظور ہے۔

نوٹ: اس وکالت نامہ کی فوٹو کاپی نام قابل قبول ہوگی۔