


FORM OF ORDER SHEET

Court of _____

Appeal No. 1588/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/09/2024	<p>The appeal of Mr. Haider Ali resubmitted today by Mr. Sher Hyder Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Haider Ali Khan received today i.e on 18.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of finding of Medical Board mentioned in para-3(Annexure-B) is not attached with the appeal be placed on it.

No. 800 /Inst./2024/KPST,

Dt. 19/9 /2024.

Amatul
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sher Hyder Khan Adv.
High Court at Peshawar.

Respected Sir,

The request document is place on file as Page # 18/A.

Re-submitted please.



24/9/2024

BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1588 Of 2024

Haider Ali Khan Ex Police Constable (Belt No. 1207)

VERSUS

Inspector General / Provincial Police Officer, Khyber
Pakhtunkhwa, at Civil Secretariat Peshawar & others

APPLICATION FOR FIXATION OF THE INSTANT
SERVICE APPEAL IN PRINCIPLE SEAT/PESHAWAR OF
THIS HONORABLE TRIBUNAL FOR PRELIMINARY
HEARING.

Respectfully Sheweth;

1. That the above titled service appeal is pending for adjudication before this Honorable Tribunal at Peshawar; where no date of hearing is fixed.
2. That the applicant and counsel for the applicant also residing/practicing at Peshawar.
3. That there is no legal bar on acceptance of the instant application for the better administration of justice.

It is therefore; humbly request that on acceptance of the instant service appeal may very kindly be fixed for hearing before the principal seat at Peshawar for preliminary hearing.


Appellant

Through

SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)

BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

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Inspector General / Provincial Police Officer, Khyber
Pakhtunkhwa, at Civil Secretariat Peshawar & others

I N D E X

S.No.	Description of Documents	Annexure	Pages
1.	Grounds of Service Appeal along with certificate		1-4
2.	Affidavit		5
3.	Addresses of Parties		6
4.	Copy of Appointment Order	"A"	7-17
5.	Copy of Standing Medical Board Certificate Dated; 26-12-2018	"B"	18/A
6.	Copy of Discharge from Service Dated; 11-01-2019	"C"	19
7.	Copies Hospitalization / Treatments	"D"	20-29
8.	Copies of Departmental Appeals / Representations; I. Respondent No. 1; 27-05-2024 II. Respondent No. 2; 28-04-2024 III. Respondent No. 3; 05-03-2024	"E"	30-34
9.	Wakalat Nama		35

Dated; 03-09-2024

Through

Appellant

SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)

**BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No 1588 Of 2024

Haider Ali Khan Ex Police Constable (Belt No. 1207)
S/o Samandar Khan, Resident of Mohallah Bakamak
District Tehsil and Chitral Lower.

.....Appellant

V E R S U S

1. Inspector General / Provincial Police Officer, Khyber Pakhtunkhwa, at Civil Secretariat Peshawar.
2. Deputy Inspector General of Police, Malakand Division, Khyber Pakhtunkhwa, at Saidu Sharif Swat.
3. District Police Officer, Chitral Lower, Police Line at Chitral Town, District and Tehsil Chitral Lower.

.....Respondents

APPEAL U/S 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE ORDER DATED: 11-01-2019, VIDE WHICH THE APPELLANT HAS BEEN RETIRED/DISCHARGED FROM SERVICE ON ACCOUNT OF MEDICAL FITNESS.

PRAYER IN APPEAL:

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL THE IMPUGNED ORDER OF RESPONDENT NO. 03, DATED: 11-01-2019, MAY PLEASE BE SET-ASIDE AND DECLARED AS ILLEGAL AND VOID-AB-INITIO AND THE APPELLANT MAY PLEASE BE RE-INSTATED IN SERVICE WITH ALL THE ACCRUING BACK BENEFITS ADMISSIBLE UNDER THE LAW.

Respectfully Sheweth;

Brief facts and grounds giving rise to the instant service appeal are as under;

ON FACTS

1. **That** the names and addresses of the parties have correctly been given in the head note of the instant service appeal, which are sufficient for the purpose of effecting their proper services and citation etc.
2. **That** the appellant is law abiding citizen of Islamic Republic of Pakistan and was serving as Police Constable under the control of District Police Officer Chitral Lower.
Copy of Appointment Order is Annexed "A".
3. **That** on Dated; 26-12-2018 during service the appellant gone through a depressive psychiatric illness which rendered him unfit for proper and efficient discharge of duties and the appellant appeared before the Standing Medical Board. Accordingly, the appellant was declared unfit and the board issued invaliding certificate declaring him incapacitated and not fit for further service.
Copy of Standing Medical Board Certificate Dated; 26-12-2018 is annexure "B".
4. **That** in light of the findings of the Standing Medical Board the Respondent No. 3 discharged the appellant from further performance of duty and issued his retirement order, vide office order endorsement No; 369-77 E-II, Dated; 11-01-2019.
Copy of Discharge from service dated; 11-01-2019 is Annexure "C".

5. **That** the appellant underwent medical treatment and is fully fit to perform his duties, due to this fact the Appellant submitted an application to Respondent No. 03 Dated; 05-03-2024, for medical re-examination in order to enable him to rejoin the department, but the request fell on deaf ears, so the appellant approached the Respondent No. 02 Dated; 28-04-2024 in this behalf, but to no avail, lastly the appellant submitted Departmental Appeal / Representation to Respondent No. 01, Dated 27-05-2024 vide dairy No. 580/PSO; but the same has not been responded, within the statutory period, hence; the instant service appeal on the following grounds *inter alia*.

Copies Hospitalization / Treatments are Annexure "D" & Copies of Departmental Appeals / Representations are Annexure "E".

GROUND S

A. That the Appellant has been retired/ discharged from service on the basis of Medical Grounds, but the Appellant has not been provided an opportunity of re-examination after treatment, hence; indulgence of Honorable Tribunal is desired.

B. That there is no legal bar, for re-employment of an employee who has regained health after obtaining in valid pension or an employee is invalided been incapacitated for employment in a particular branch of service.

C. That there is no legal bar to conduct re-examination of the appellant by holding Standing Medical Board for determination of medical fitness of the appellant.

D. That the Appellant has rendered 08 years of exemplary service to the department and feeling fully qualified and entitled to continue his remaining service till the age of superannuation.

E. That the Appellant has been retired/ discharged from service pre-maturely without considering the nature of the disease and whether it is curable after treatment, this fact alone is enough for striking down the order dated 11-01-2019.

F. That the appellant has not been treated in accordance to Article 4 and 10-A of the Constitution of Islamic Republic of Pakistan.

G. That any other grounds in respect of the instant appeal will be raised at the time of arguments with permission of the Honorable Tribunal.

It is, therefore, most humbly submitted that on acceptance of the instant service appeal the impugned order dated; 11-01-2019, may please be set-aside and declared as illegal and void-ab-initio and the appellant may please be re-instated in service with all the accruing back benefits admissible under the law.

Dated; 03-09-2024

CERTIFICATE;

It is certified that no other service appeal on the same subject has been filed before this Honorable Tribunal.

Counsel

Appellant

Through,

SHER HYDER KHAN,
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)

Sidra Nazir
ADVOCATE HIGH COURT

Kamran Umer
Advocate Peshawar

(5)

BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No

Of 2024

Haider Ali Khan Ex Police Constable (Belt No. 1207)

VERSUS

**Inspector General / Provincial Police Officer, Khyber
Pakhtunkhwa, at Civil Secretariat Peshawar & others**

AFFIDAVIT;

I, Haider Ali Khan Ex Police Constable (Belt No. 1207), S/o Samandar Khan, Resident of Mohallah Bakamak District Tehsil and Chitral Lower; Appellant; do hereby solemnly affirm and declare on Oath that the contents of the accompanying Application for temporary injunction along with interim relief; are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable Tribunal.

Verified by;

SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)

Haider Ali Khan
Deponent

Amal
18-7
24

6

BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____ **Of 2024**

Haider Ali Khan Ex Police Constable (Belt No. 1207)

VERSUS

**Inspector General / Provincial Police Officer, Khyber
Pakhtunkhwa, at Civil Secretariat Peshawar & others**

ADDRESSES OF PARTIES

APPELLANT

**Haider Ali Khan Ex Police Constable (Belt No. 1207)
S/o Samandar Khan, Resident of Mohallah Bakamak
District Tehsil and Chitral Lower.**

RESPONDENTS

- 1. Inspector General / Provincial Police Officer, Khyber
Pakhtunkhwa, at Civil Secretariat Peshawar.**
- 2. Deputy Inspector General of Police, Malakand Division,
Khyber Pakhtunkhwa, at Saidu Sharif Swat.**
- 3. District Police Officer, Chitral Lower, Police Line at
Chitral Town, District and Tehsil Chitral Lower.**

Appellant

Through,

SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)

The following record contributors are hereby selected / appointed as time serve constables in UP-S-5(3340-160-8140) w.c. from 28/12/2010 (FN) and allotted contributory No. as noted against their each name and posted to Police Line Chitral with immediate effect

"A"
Annexure

S. No	Name & No	Father's Name	CNIC No.	Place of Posting
1	Rehmat Ali Shah 1171	Shea Wali Shah	15201-5480635-3	Police Line
2	Mansoor Ali Shah 1172	Masood Ali Shah	15201-5481373-7	Police Line
3	Sajjad Din 1173	Abulhak	15201-772117-7	Police Line
4	Ikhlasud Din 1174	Zia Farid	15202-8303710-7	Police Line
5	Imranud Din 1175	Muhammad Ismail Din	15201-9740025-1	Police Line
6	Ibrahim Khan 1176	Ibrahim Khan	15201-8417103-3	Police Line
7	Ubaidullah 1177	Chawas Khan	15201-4070043-7	Police Line
8	Asmariyah 1178	Muhammad Sabir	15202-5400426-9	Police Line
9	Rahimud Din Shah 1179	Daqhudad Wali Shah	15201-4710616-7	Police Line
10	Zahirullah 1180	Humayon Khan	15202-9766523-9	Police Line
11	Aftab Wali Shah 1181	Qakhtawar Shah	15201-8510982-3	Police Line
12	Saifullah 1182	Khairullah	15202-4445729-5	Police Line
13	Akbar Khan 1183	Noor Khan	15201-4997779-1	Police Line
14	Nabi Khan 1184	Samandar Khan	15201-3065785-3	Police Line
15	Shahid Atiqur Rehman 1185	Mujeebur Rehman	15202-2395652-3	Police Line
16	Amir Muhammad 1186	Ghulam Khan	15201-9082737-9	Police Line
17	Mukhtar Ahmed 1187	Qadir Khan	15201-4451971-3	Police Line
18	Abdul Qadir 1188	Rehmat Navir	15201-8711178-7	Police Line
19	Alta Ellahi 1189	Syed Azmat Shah	15202-0482603-5	Police Line
20	Shamsur Rehman 1190	Abdur Rehman	15202-6580759-3	Police Line
21	Salahud Din 1191	Khoshi Muhammad	15202-7957043-3	Police Line
22	Fatah Rehman 1192	Qazi Alsar	15201-8250278-3	Police Line
23	Rashidul Hassan 1193	Mubarak Shah	15201-9895171-7	Police Line
24	Muhammad Aslam 1194	Muhammad Hussain Khan	15202-3968661-3	Police Line
25	Mansoor Ellahi 1195	Fazal Ellahi	15201-3879144-3	Police Line
26	Noor Ahmed 1196	Mir Ahmed	15201-8676161-7	Police Line
27	Tanvirud Din 1197	Abdul Navir Khan	15202-4650030-9	Police Line
28	Syed Navir Shah 1198	Muazam Shah	15202-1078679-7	Police Line
29	Syed Amir Ali Shah 1199	Syed Jamat Shah	15201-0914549-1	Police Line
30	Murab Shah 1200	Murshid Shah	15201-3053697-1	Police Line
31	Saeed Nabi 1201	Rehmat Nabi	15201-1584744-5	Police Line
32	Ziarat Wali Khan 1202	Sher Swat Khan	15202-6035693-3	Police Line
33	Shafiqullah 1203	Shorna Khan	15202-3035667-9	Police Line
34	Rehmat Ali 1204	Shayr Khan	15201-5041263-5	Police Line
35	Muhammad Ishaq 1205	Muhammad Yousaf	15201-5118555-3	Police Line
36	Muhammad Arif 1206	Sher Haider Khan	15202-3721447-1	Police Line
37	Haider Ali Khan 1207	Samandar Khan	15201-0526740-5	Police Line
38	Ajaz Wali Shah 1208	Mir Sawal Khan	15202-6092647-5	Police Line
39	Shah Waliud Din 1209	Fazal Muhammad	15201-1488590-7	Police Line
40	Shahjahan 1210	Azizullah Khan	15201-7748107-5	Police Line
41	Sardar Ayub 1211	Indust	15201-3007463-9	Police Line
42	Abdul Wahid 1212	Abdul Khaliq	15201-0568529-9	Police Line
43	Mir Baz Khan 1213	Sher Dula Khan	15201-1139186-7	Police Line
44	Muhammad Akber Khan 1214	Abdul Murad	15201-2076337-9	Police Line
45	Mujeeb Ahmed 1215	Siraj Ahmed	15201-0117007-3	Police Line
46	Safiq Din 1216	Shah Farooz	15201-1190025-3	Police Line
47	Viqar Ahmed 1217	Karim Khan	15201-8736749-3	Police Line
48	Ashraf Nayab 1218	Ashraf Danq	15201-6360917-5	Police Line
49	Abozar Ghafari 1219	Sardar Mughilbaz Khan	15202-2702573-3	Police Line
50	Sulvan 1220	Muhammad Suban	15202-8369436-5	Police Line
51	Sher Nawaz Khan 1221	Sher Murad	15202-5112198-3	Police Line
52	Asad Azam 1222	Inda Mustafa	15201-4179615-3	Police Line
53	Ghulam Sabir 1223	Fazal Muhammad	15201-0339979-1	Police Line
54	Rehmat Nabi 1224	Fazal Nabi	15201-1034558-9	Police Line
55	Raufan 1225	Abdul Majid Khan	15201-7482790-7	Police Line
56	Az Ahmed 1226	Mir Ajib Khan	15201-5163380-3	Police Line
57	Salim Malik 1227	Muhammad Zahir Shah	15201-1426724-5	Police Line
58	Habibur Rehman 1228	Sher Nayab Khan	15202-7011809-5	Police Line
59	Akbar Ayubi 1229	Mir Hakim	15201-4495795-9	Police Line

[Handwritten signatures and initials]
05/11/2010

8

BETTER COPY**OFFICE ORDER**

The following recruit constables are hereby selected / appointed as time scale constable in BPS-05 Rs. (3840-160-8140) w-e-f 28-12-2010 (FN) and allotted constabulary No. as noted against their each names and posted to the Police Line Chitral with immediate effect.

Sr. No	Name	Belt No	Father's Name	CNIC No	Place of posting
1	Rahmat Ali Shah	1171	Sher Wali Shah	15201-5480635-3	Police Line
2	Murtza Ali Shah	1172	Maqsood Ali Shah	12201-64813-3	Police Line
3	Shuja Uddin	1173	Adabuk	42101-775717-7	Police Line
4	Ikhlas Uddin	1174	Zar Janat	15202-8303710-7	Police Line
5	Imranud Din	1175	Muhammad Isamud Din	15201-9740025-1	Police Line
6	Ibrahim Khan	1176	Rahim Khan	15201-8417103-3	Police Line
7	Ubaidullah	1177	Ghawas Khan	15201-4070043-7	Police Line
8	Asmarullah	1178	Muhammad Sabir	15202-5400426-9	Police Line
9	Rahimud Din Shah	1179	Baghudad Wali Shah	15201-4710616-7	Police Line
10	Zahirullah	1180	Hamayon Khan	15202-9766523-9	Police Line
11	Aftab Wali Shah	1181	Bakhtawar Shah	15201-8510982-3	Police Line
12	Saifullah	1182	Khairullah	15202-4445729-5	Police Line
13	Akhbar Khan	1183	Noor Khan	15201-4997779-1	Police Line
14	Nabi Khan	1184	Samandar Khan	15201-3065785-3	Police Line
15	Shahid Attiqur Rehman	1185	Mujeebur Rehman	15202-2395652-3	Police Line
16	Amir Muhammad	1186	Ghulam Khan	15201-9082737-9	Police Line
17	Mukhtar Ahmad	1187	Qadir Khan	15201-4451971-3	Police Line
18	Abudilalah	1188	Rehmat Nazir	15201-8711178-7	Police Line
19	Atta Elahi	1189	Sayed Azmat Shah	15202-0482603-5	Police Line
20	Shamsur Rehman	1190	Abdur Rehman	15202-6580759-3	Police Line
21	Salahud Din	1191	Khoshi Muhammad	15202-7957043-3	Police Line
22	Fatah Rehman	1192	Qazi Afsar	15201-8250278-3	Police Line
23	Rashidul Hassan	1193	Mubarak Shah	15202-9895171-7	Police Line
24	Muhammad Aslam	1194	Muhammad Hussan Khan	15202-3968661-3	Police Line
25	Mansoor Elahi	1195	Fazal Elahi	15201-3879144-3	Police Line
26	Noor Ahmad	1196	Mir Ahmad	15201-8676161-7	Police Line
27	Tanvirud Din	1197	Abdul Nazir Khan	15202-4650030-9	Police Line
28	Sayed Wazir Shah	1198	Muazam Shah	15202-1078679-7	Police Line
29	Sayed Amir Ali Shah	1199	Sayed Jamat Shah	15201-0914549-1	Police Line
30	Mujaib Shah	1200	Muslim Shah	15201-3053697-1	Police Line

(9)

BETTER COPY

32	Ziarat Wali Khan	1202	Sher Sawat khan	15202-6035693-3	Police Line
33	Shafiullah	1203	Sheraz Khan	15202-3835667-9	Police Line
34	Rehmat Ali	1204	Sher Khan	15201-5041263-5	Police Line
35	Muhammad Ishaq	1205	Muhammad yousaf	15201-5118555-3	Police Line
36	Muhammad Arif	1206	Sher Hyder Khan	15202-3721447-1	Police Line
37	Haider Ali Khan	1207	Samandar Khan	15201-0526740-5	Police Line
38	Ajaz Wali Shah	1208	Mir sawat Khan	15202-6992647-5	Police Line
39	Shah Waliud Din	1209	Fazal Muhammad	15201-1488509-7	Police Line
40	Shafiqullah	1210	Azizullah Khan	15201-7746197-5	Police Line
41	Sardar Ayub	1211	Mirdost	15201-3007463-9	Police Line
42	Abdul Wahid	1212	Abdul Khaliq	15201-0566525-9	Police Line
43	Mir Baiz Khan	1213	Sher Dula Khan	15201-1139186-7	Police Line
44	Muhammad Akhber Khan	1214	Abudl Murad	15021-2076337-9	Police Line
45	Mujeeb Ahmad	1215	Siraj Ahmad	15201-0117007-3	Police Line
46	Saifud Din	1216	Shah Fairoz	15201-1190025-3	Police Line
47	Wiqar Ahmad	1217	Karim Khan	15201-8736749-3	Police Line
48	Ashraf Nayab	1218	Ashraf Baig	15201-6368917-5	Police Line
49	Abzor Ghafari	1219	Sardar Mughulbaz Khan	15202-2702573-3	Police Line
50	Safwan	1220	Muhammad Suban	15202-8369436-5	Police Line
51	Sher Nawaz Khan	1221	Sher Murad	15202-5112198-3	Police Line
52	Asad Azam	1222	Fida Mustafa	15201-4179615-3	Police Line
53	Ghulam Sabir	1223	Fazal Muhammad	15201-8339979-1	Police Line
54	Rehmat Nabi	1224	Fazal Nabi	15201-1034558-9	Police Line
55	Attaullah	1225	Abdull Majid Khan	15201-7482790-7	Police Line
56	Ijaz Ahmad	1226	Mir Ajab Khkan	15201-5163380-3	Police Line
57	Salim Malik	1227	Muhammad Zahir Shah	15201-1426724-5	Police Line
58	Habibur Rhemana	1228	Sher Nayab Khan	15202-7011809-5	Police Line
59	Aftar Ayub	1229	Mir Hakim	15201-4495795-9	Police Line
60	Nasirullah	1230	Zkirullah	15201-5179049-3	Police Line
61	Muhammad Nabi	1231	Muhammad sharif	15201-0715841-9	Police Line
62	Ibrahim,	1232	Zaraman	15202-7743377-9	Police Line
63	Hassan Sardar	1233	Sher Azam	15202-8477845-1	Police Line
64	Ijaz Ahmad	1234	Noorr Muhammad	15201-1180176-1	Police Line
65	Saddam Hussan	1235	Muhibur Rehman	15201-1180176-1	Police Line
66	Fahim Dastagir	1236	Chiragh Dastagir	15201-6807934-1	Police Line
67	Abudullah Jan	1237	Savod Dadir Shah	15201-8975718-5	Police Line

60	Nasrullah	1230	Zakirullah	15201-5179049-3	Police Line
61	Muhammad Nabi	1231	Muhammad Sharif	15201-0715841-9	Police Line
62	Ibrahim	1232	Zarman	15202-7743377-9	Police Line
63	Hossain Sardar	1233	Sher Azam	15202-8477845-1	Police Line
64	Ijaz Ahmad	1234	Noor Muhammad	15201-3824709-3	Police Line
65	Sadam Hussain	1235	Muhibur Ruhman	15201-1180176-1	Police Line
66	Fahim Dastagir	1236	Chiragh Dastagir	15201-6807934-1	Police Line
67	Abudullah Jan	1237	Syed Qadir Shah	15201-0075718-5	Police Line
68	Fazal Shah	1238	Muhammad Khan	15201-3865282-3	Police Line
69	Sarwarud Din	1239	Syed Jun	15201-8016287-1	Police Line
70	Wahid Rehman	1240	Chudam Sakto	15201-1278820-3	Police Line
71	Yousaf Ali	1241	Mr Nawaz Khan	15202-8095174-3	Police Line
72	Muhammad Ismail	1242	Jafar Hayat	15201-3657844-3	Police Line
73	Babool Malik	1243	Abadi Malik	15201-1140985-7	Police Line
74	Abdur Rehman	1244	Sher Ahmad Shah	15201-4480973-1	Police Line
75	Imtiyaz Rehman	1245	Sardar Mukun	15202-4732161-9	Police Line
76	Tajud Din	1246	Rozgar Khan	15202-1982094-1	Police Line
77	Khairul Rehman	1247	Muhammad Sharif	15202-4905933-7	Police Line
78	Zafar Ahmed	1248	Muhammad Aslam Khan	15202-6140960-1	Police Line
79	Ihsan Ali	1249	Amirul Din	15202-5633687-1	Police Line
80	Zameer Rehman	1250	Lalhan Rehman	15201-0834020-7	Police Line
81	Sajjad Wali Khan	1251	Rehmat Wali Khan	15201-4385060-9	Police Line
82	Muhammad Quraish	1252	Azizur Rehman	15201-6353829-1	Police Line
83	Abidur Rehman	1253	Sher Ali Khan	15201-9432332-3	Police Line
84	Shahid Ali Shah	1254	Syed Abid Shah	42201-6060756-7	Police Line
85	Akhtasud Din	1255	Mir Baiz	15201-6954124-7	Police Line
86	Wali Muhammad	1256	Pinin Khan	15201-0637938-9	Police Line
87	Shujaat Rehman	1257	Farooz Khan	15201-6239032-3	Police Line
88	Zakir Hussain	1258	Muhammad Ibrahim Khan	15201-4280866-1	Police Line
89	Sultan Nawaz	1259	Sultan Wali Khan	15201-8691370-5	Police Line
90	Shamsur Rehman	1260	Mir Muhammad Khan	15201-0202602-3	Police Line
91	Shakil Ahmed	1261	Zafar Ahmed Khan	15202-5760091-1	Police Line
92	Sarwarud Din	1262	Shorud Din	15201-8739452-9	Police Line
93	Muhammad Tariq Zia	1263	Ahmed Raheeq Khan	15301-0407266-1	Police Line
94	Syed Rahman Ali Shah	1264	Syed Aziz Shah	15202-8599872-9	Police Line
95	Ashfaq Hussain	1265	Shah Alam Taj	15202-6595464-7	Police Line
96	Azizur Rehman	1266	Imtiyaz Rehman	15202-5685477-9	Police Line
97	Zahidur Din	1267	Zawar Khan	15201-0895102-7	Police Line
98	Abdul Hakeem Khan	1268	Abdul Jabbar	15201-7616522-5	Police Line
99	Mir Azam Khan	1269	Mir Ajam Khan	15201-8464966-1	Police Line
100	Rehmat Ali Shah	1270	Khosh Ahmad	15201-4210860-9	Police Line
101	Anwar Shah	1271	Zurawar Shah	15202-7819030-5	Police Line
102	Shukhoor Khan	1272	Sayyorch Khan	15202-7819030-5	Police Line
103	Uzairud Din	1273	Aslahud Din	15201-3137816-7	Police Line
104	Maqbool Hussain	1274	Chulam Muhammad Khan	15201-8866746-1	Police Line
105	Shahid Anwar	1275	Hazarat Sulah	15201-7925516-1	Police Line
106	Fazal Hadi	1276	Abdul Raq	15202-4039340-1	Police Line
107	Wazir Ali	1277	Syed Chudam	15201-1709423-1	Police Line
108	Shaukat Ali Khan	1278	Gulshan Khan	15201-8095707-5	Police Line
109	Qamarud Azam	1280	Noor Azam	15201-6857764-5	Police Line
110	Ihsan Rehman	1281	Zahidur Rehman	15202-4783036-5	Police Line
111	Hussain Ahmad Khan	1282	Imtiyaz Khan	15202-8257882-5	Police Line
112	Zafarud Din	1283	Zahid Rehman	15201-3167099-5	Police Line
113	Wajidud Din	1284	Hussainud Din	15201-0797391-9	Police Line
114	Iman Ali Shah	1285	Sher Khan	15201-3736281-1	Police Line
115	Mudhkar Ahmad	1286	Chudam Maqbool	15201-8866746-1	Police Line
116	Hazwan Ali	1287	Imtiyaz Shaukat Ali	15201-2992585-9	Police Line
117	Nisarud Din	1288	Anwar Ahmad	15201-0591730-1	Police Line
118	Sadiqur Rehman	1289	Muhammad Murad Khan	15201-5031144-9	Police Line
119	Chuday Hussain	1290	Muhammad Hussain	15201-1778888-5	Police Line
120	Hazimud Din	1291	Muhammad Nazimud Din	15202-6137646-9	Police Line
121	Mir Ajam Khan	1292	Mutabar Khan	15201-1363765-5	Police Line
122	Mohammadul Hassan	1293	Rehmatullah	15201-0984285-1	Police Line
123	Muhammad Ayaz	1294	Mir Gulab	15201-3772900-5	Police Line
124	Adil Wali Khan	1295	Hulbul Wali Khan	15201-5881153-5	Police Line
125	Ghulam Abbas	1296	Ahmed Khusrav	15201-1040517-9	Police Line
126	Nadir Wali Khan	1297	Dinar Wali Khan	15201-5232881-5	Police Line
127	Abdul Sabir	1298	Sher Wazir Khan	15201-4455309-1	Police Line
128	Anwarud Din	1299	Yousaf Panah	15202-6541535-1	Police Line

Handwritten signatures and initials on the right side of the page, including a large signature and some scribbles.

(11)

BETTER COPY

68	Fazel shafi	1238	Muhammad khan	15201-3865282-3	Police Line
69	Sarwarud Din	1239	Sayed Jan	15201-8016287-1	Police Line
70	Waliur Rehman	1240	Ghulam Sakhi	15201-1276820-3	Police Line
71	Yousaf Ali	1241	Mir Nawaz Khan	15202-6095174-3	Police Line
72	Muhammad Ismail	1242	Jafer Hayat	15201-3657844-3	Police Line
73	Babarul Mulk	1243	Abadi mulk	15201-1140985-7	Police Line
74	Abdur Rehman	1244	Sher Ahmad Shah	15201-4480973-1	Police Line
75	Imtiazur Rehman	1245	Sardar Hakim	15202-4732161-9	Police Line
76	Tajud Din	1246	Rozhgr Khan	15202-1982094-1	Police Line
77	Khalilur Rehman	1247	Muhammad Sharif	15202-4905933-7	Police Line
78	Zafar Ahmad	1248	Muhammad Aslam Khan	15202-6140960-1	Police Line
79	Ihsan Ali	1249	Amir Uddin	15202-5633687-1	Police Line
80	Ziaur Rehman	1250	Hayat Ur Rehman	15201-6834020-7	Police Line
81	Sajjad Wali Khan	1251	Rehmat Wali Khan	15201-4385060-9	Police Line
82	Muhammad Quraish	1252	Azizur Rehman	15201-6353829-1	Police Line
83	Abidur Rehman	1253	Sher Ali Khan	15201-9432332-3	Police Line
84	Shahid Ali Shah	1254	Sayed Abid Shah	42201-6060756-7	Police Line
85	Akhiasud Din	1255	Mir Baiz	15201-6954127-7	Police Line
86	Wali Muhammad	1256	Pinin Khan	15201-0637938-9	Police Line
87	Shujaur Rehman	1257	Farooz Khan	15201-6239032-3	Police Line
88	Zakir Hussain	1258	Muhammad Ibrahim Khan	15201-4280866-1	Police Line
89	Sultan Nawaz	1259	Sultan Wali Khan	15201-8691370-5	Police Line
90	Shmsur Rehman	1260	Mir Muhammad Khan	15201-0202602-3	Police Line
91	Sahid Ahmad	1261	Zafar Ahmad Khan	152025760091-1	Police Line
92	Sarwarud Din	1262	Sherud Din	15201-8739452-9	Police Line
93	Muhammad Traiq Zia	1263	Abdur Razaq khan	15301-040739452-9	Police Line
94	Sayed Rehman Ali Shah	1264	Sayed Aziz Shah	15202-85599872-9	Police Line
95	Ashfaq Hussain	1265	Shah	15202-6595464-7	Police Line
96	Azizur Rehman	1266	Faizur Rehman	15202-5685477-9	Police Line
97	Zahirud din	1267	Zawar Khan	15201-0895102-7	Police Line
98	Abdull Halim Khan	1268	Abdul Jabar	15201-7616522-5	Police Line
99	Mir Azam Khan	1269	Mir Ajam khana	15201-8464966-1	Police Line
100	Rehmat Ali Shah	1270	Khosh Ahmad	15201-8464966-1	Police Line
101	Anwar Shah	1271	Zurawar shah	15202-7819030-5	Police Line
102	Shokhoor khan	1272	Sayrooch Khan	15202-7819030-5	Police Line
103	Uzairud Din	1273	Asalabud Din	15201-2137816-7	Police Line

(12)

BETTER COPY

104	Maqbool Hussain	1274	Ghulam Muhammad Khan	15201-8866746-1	Police Line
105	Shahid Anwar	1275	Hazarat Shah	15201-7925516-1	Police Line
106	Fazli Hadi	1276	Abdul Baqi	15202-4039640-1	Police Line
107	Wazir Ali	1278	Sayed Ghulam	15201-1709423-1	Police Line
108	Shokhoor Ali Khan	1279	Gulmat Khan	15201-8095707-5	Police Line
109	Qamarul Azam	1280	Noor Azam	15201-6857764-5	Police Line
110	Inamur Rehman	1281	Zahidur Rehman	15202-4783056-5	Police Line
111	Hussain Ahmad Khan	1282	Rushh Khan	15202-8257042-5	Police Line
112	Zafarud Din	1283	Saifur Rehman	15201-5162099-5	Police Line
113	Wajihud Din	1284	Hassamud Din	15201-0797391-9	Police Line
114	Irfan Ali Shah	1285	Sher Khan	15201-3736258-1	Police Line
115	Mashkooor Ahmad	1286	Ghulam	15201-9059100-9	Police Line
116	Rizwan Ali	1287	Hafiz Shoukat Ali	15201-2992585-9	Police Line
117	Nisarud Din	1288	Anwar Ahmad	15201-0591730-1	Police Line
118	Sadiqur Rehman	1289	Muhammad Murad Khan	15201-5031141-9	Police Line
119	Shafiq Hussain	1290	Muhammad Hussain	15201-1773838-5	Police Line
120	Hamidud Din	1291	Muhammad Nazimud Din	15202-6137646-9	Police Line
121	Mir Ajam Khan	1292	Mutabar Khan	15201-1363765-5	Police Line
122	Mehmoodul Hassan	1293	Rehmat Ullah	15201-894285-1	Police Line
123	Muhammad Ayaz	1294	Mir Ghulab	15201-3772988-5	Police Line
124	Adil Wali Khan	1295	Bulbul Wali Khan	15201-5881153-5	Police Line
125	Ghulam Abbas	1296	Ahmad Khisraw	15201-1040517-9	Police Line
126	Nadir Wali Khan	1297	Dinar Wali Khan	15201-5232881-5	Police Line
127	Abdul Sabir	1298	Sher wazi Khan	15201-4455309-1	Police Line
128	Anwarud Din	1299	Yourmass Panah	15202-6541535-1	Police Line
129	Munir Ahmad	1300	Faiz Muhammad	15201-9230947-9	Police Line
130	Hayatur Rehman	1301	Sultan Khan	15201-2311403-7	Police Line
131	Imtiaz Ahmad	1302	Sahib Gull	15201-9917365-5	Police Line
132	Raifiqud Din	1303	Aqrarud Din	15201-5633541-7	Police Line
133	Imtiaz Ahmad	1304	Abdul Qadir	15202-6847172-1	Police Line
134	Sher Rahim Khan	1305	Ali Panah	15201-6698744-9	Police Line
135	Ali Diyar	1306	Abdul Murad	15201-2279724-1	Police Line
136	Imran	1307	Jumma Khan	15201-30311883-3	Police Line
137	Iqbal Hayat	1308	Gul Samber Khan	15201-3191229-5	Police Line
138	Ghulam Haider	1309	Ghulam Nabi	15201-2999355-3	Police Line
139	Ali Hussain	1310	Abdull Khalid	15201-2198370-5	Police Line

(12)

129	Munir Ahmed	1300	Faiz Muhammad	15201-9230947-9	Police Line
130	Hayat ur Rehman	1301	Sultan Khan	15201-2311403-7	Police Line
131	Imtiaz Ahmad	1302	Sahib Gul	15201-9917365-5	Police Line
132	Rafiq ur Din	1303	Aqarud Din	15201-9633541-7	Police Line
133	Imtiaz Ahmad	1304	Abdul Qadir	15202-6847172-1	Police Line
134	Sher Rahim Khan	1305	Ali Panah	15201-6698744-9	Police Line
135	Ali Durr	1306	Abdul Murad	15201-2279724-1	Police Line
136	Imran	1307	Juma Khan	15201-3031188-3	Police Line
137	Iqbal Hayat	1308	Gul Samber Khan	15201-3191229-5	Police Line
138	Ghulam Haider	1309	Ghulam Nabi	15201-2999355-3	Police Line
139	Ijaz Hussain	1309	Abdul Khalid	15201-2198370-5	Police Line
140	Azizullah	1310	Ahmed Shah	15202-4451748-5	Police Line
141	Saadat Hussain	1311	Ghulam Hussain	15201-4141334-8	Police Line
142	Ejaz Ahmad	1312	Abdul Baq	15201-9478814-1	Police Line
143	Didar Nabi	1313	Zar Nabi Khan	15202-0865843-1	Police Line
144	Mir Haider	1314	Nawab Khan	15202-5615413-0	Police Line
145	Farooq Ali Shah	1315	Sadru Wazir Shah	15201-0841019-1	Police Line
146	Sikandar Nawaz	1316	Umar Nawaz	15202-1802978-5	Police Line
147	Riaz Ahmad Khan	1317	Sher Muhammad	15202-2503736-7	Police Line
148	Sikandar Hayat	1319	Muhammad Ishaq	15201-1160907-5	Police Line
149	Gul Hayat	1318	Gul Faraz	15201-1487114-3	Police Line
150	Abdur Roud	1320	Haramshi Khan	15202-5571610-1	Police Line
151	Javid Ahmed	1321	Sabir Ahmed	15201-1971524-0	Police Line
152	Abdullah Khan	1322	Dulra Khan	15201-0109269-3	Police Line
153	Wali Hakeem	1323	Muhammad Hakim	15201-5136018-1	Police Line
154	Muhammad Zakir Khan	1324	Muhammad Riza Khan	15201-5067716-1	Police Line

D/S/O
D/S/O
D/S/O

A. Ashraf
District Police Officer,
Chitral

No. 19691-58 E-II, dated Chitral 1/12

31-12 2010.

- 1- Copy to:-
- 2- The District Account Officer Chitral.
- 3- DSP Hqrs: Chitral
- 4- RI/LO Police Line
- 5- Pay Officer
- 6- Reader for OB
- 7- CGHC Police Line
- 8- I C

OB NO = 773

dt 31-12-2010

14

BETTER COPY

140	Azizullah	1311	Ahmad Shah	15202-4451748-5	Police Line
141	Saadat Hussain	1312	Ghulam Hussain	15201-4141334-9	Police Line
142	Ejaz Ahmad	1313	Abdul Baqi	15201-9478814-1	Police Line
143	Didar Nabi	1314	Zar Nabi Khan	15202-9865843-1	Police Line
144	Mir Haider	1315	Nawab Khan	15202-5615413-9	Police Line
145	Farooq Ali Shah	1316	Sultan Wali Shah	15201-6841019-1	Police Line
146	Sikandar Nawaz	1317	Pinin Nawaz	15202-1802078-5	Police Line
147	Riaz Ahmad Khan	1318	Sher Muhammad	15202-2593736-7	Police Line
148	Sikandar Hayat	1319	Muhammad Ishaq	15201-1160907-5	Police Line
149	Gul Hayat	1320	Gul Faraz	15201-1487114-3	Police Line
150	Abdur Rauf	1321	Baramush Khan	15202-5571610-	Police Line
151	Javid Ahmad	1322	Sabir Ahmad	15201-1971524-9	Police Line
152	Attaullah Khan	1323	Dula Khan	15201-0109269-3	Police Line
153	Wali Hakeem	1324	Muhammad Hakeem	15201-5136018-1	Police Line
154	Muhammad Zakir Khan	135	Muhammad Riza Khan	15201-5067716-1	Police Line

**District Police Officer
Chitral**

No 19691-98 E-II,

Dated; 31-12-2010

Copy to:-

1. District Accounts Officer Chitral
2. DSP Hqrs; Chitral
3. RI/LO Police Line
4. Pay Officer
5. Reader of OB
6. GGHC Police Line
7. I/C

(15)

CPPC

DISTRICT



No: 6560

CHITRAL

Date 25/8/10

DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in K.P.K. having belonged to it by birth/settled in it.



I belong by birth to Village/Mohallah Bacamak.

Tehsil Chitral District Chitral.

Haider Ali Khan.
Signature of the applicant

Dated 26/7/2010

Pursuance to the declaration dated 26/7/2010 filled by

Haider Ali Khan. Son/Daughter of Samander Khan.

domiciled in the K.P.K., it is hereby certified that the said _____ is born of parents who are permanent resident of the K.P.K. having belonged to it by birth/settled in it.

I have satisfied myself from my personal knowledge / verification that the above declaration is true and certify.

This 26th day of July 2010.

Countersigned by

DISTRICT OFFICER,
(Revenue and Estate)
Chitral.




DEPUTY DISTRICT OFFICER,
(Revenue and Estate)
Deputy District Officer
Revenue and Estate
Chitral

CPPC


تصدیق دی جاتی ہے۔

کہ حیدر علی خان ولد سمندر خان قوم
گاؤں بقامک تحصیل چترال ضلع چترال کی پیدائشی اور مستقل سکونت پر مشتمل ہے اور
یہاں پر جائیداد منقولہ وغیر منقولہ امکانات کے مالک ہیں میں ذاتی طور پر نہیں جانتا ہوں۔ درخواست گزار ڈومیسائل سرٹیفکیٹ کا مستحق
ہے۔


District Officer (D.O.)
Chitral

تصدیق کنندہ

Verified that the applicant Haider Ali Khan
Son/Daughter of Samander Khan
is by birth a permanent bonifide resident of
Village Bacamak Tehsil Chitral.
District Chitral and is entitled to the grant of Domicile Certificate. His/Her
Parents are also permanent bonifide residents of this village and they
possess landed property/residential house in the same locality.

NAIB T. H. D. R.

NAIB T. H. D. R.



16

کتابخانه مرکزی اسلامی بنیاد اسلامی



(17)



OFFICE OF THE
MEDICAL SUPERINTENDANT
SERVICES HOSPITAL, PESHAWAR

Phone: (Off) 091 9210509 (Exch) 091 9223472 Fax: 091 9210543

(18)
"B"
Annex-e

No. 6248-49 /MS/SMB/2017-18

Dated 26 /12/2018

District Police Officer,
Chitral

Subject: - STANDING MEDICAL BOARD

Memo: - With reference to your office letter No. 9812/E-II Dated 03/12/2018 on the subject noted above.

Constable Haidar Ali No. 1207 was examined by the Standing Medical Board held in this office on 11/12/2018. The proceedings of the Standing Medical Board are sent herewith for further necessary action.

Chairman
Standing Medical Board
Medical Superintendent
Police/Service Hospital
Peshawar

27
01-01-19

Copy to:

- Director General Health Services Khyber Pakhtunkhwa for information.

ATTESTED

Attested
by

Naqir ul Haq
Assistant (BPS-16)
Police Deptt Chitral

OHC
For necessary action

District Police Officer
Chitral

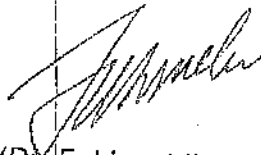
18/A

OFFICE OF THE CHAIRMAN STANDING MEDICAL BOARD/ MEDICAL SUPERINTENDENT SERVICES, HOSPITAL, PESHAWAR


The Provincial Standing Medical Board comprising the following members assembled in the office of the Medical Superintendent Police/Services Hospital, Peshawar to examine Constable Haidar Ali No. 1207.

The Provincial Standing Medical Board is of the opinion that he suffers from Schizo affective disorder. He remained under treatment of different Psychiatrist. Schizo affective disorder is relapsing disorder and during such acute episode, the patient may be aggressive and violent and the behavior remained unpredictable. Keeping in view the nature of his illness and the frequent relapses in his illness, he is unfit to continue his service in Police department and he may be boarded out on Psychiatric grounds.

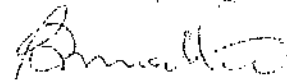
Station Peshawar:-
Dated: - 11/12/2018.




(Dr. Fakhruddin)
Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital,
Peshawar.




Medical-Superintendent
Govt. Sarhad Hospital for Psychiatric
Disease, Hospital,
Peshawar...Member



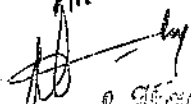
(Dr. Syed Muhammad Sultan)
Prof. of Psychiatry
Khyber Teaching Hospital
Peshawar...Member...



(Dr. Muslim Khan)
Psychiatrist
Govt. Sarhad Hospital Visiting
Consultant. Prison Peshawar...Member.



(Dr. Intikhab Alam)
Professor of Medicine
Lady Reading Hospital
Peshawar...Member

Attested

Assistant (BPS-16)
Office Dept: Central

19

"C"
Annexure

ORDER

Constable Haidar Ali No. 1207 is hereby discharged from Service w.e.f 10.01.2019 on medical ground in light of the Medical Board opinion No.6248-49/MS/SMB/2017-2018 dated 26.12.2018 of Medical Superintendent Service Hospital Peshawar, wherein he has been found suffering from Schizoaffective disorder and is unfit to continue his Service in Police department further.

No. 368-77 E-II, dated
Copies to:-

1. DAO Chitral
2. Addl: SP Chitral
3. DSP HQ Chitral
4. Pay Officer
5. RI/LO
6. Pension clerk
7. OHC for OB
8. EC
9. Inam C.O security Clearance form

11 - 01 - 2019.

District Police Officer,
Chitral

Attested by
Assistant (SPS-10)
Police Dept. Chitral

11-01-2019

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar



نوروسائیکالزسٹ
Annex e
ڈاکٹر فیاض امیر
ایم بی بی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکیاٹری)
خیبر ٹیچنگ ہسپتال پشاور


پشاور میں سب سے بڑا اور سب سے پر مشہور ہسپتال ہے
جس میں سب سے زیادہ سہولتیں اور سہولتیں دستیاب ہیں

Haider Ali Khan NOT VALID FOR MEDICO LEGAL PURPOSE

Rx

15-3-2019

Mood off/on with
feeling Sadness, known as Schizoaffective disorder
loss of interest (1) Cap. Moxit 75mg
tiredness/weakness (1) Tab. A/P 0.5mg.
Sleep Disturbance (1) (1) (1)
Appetite loss (3) Tab. Citonea cony.
Suicidal Ideas (1) (1) (1)
(1) (1) (1)


DR. FAYAZ AMIR
Consultant
Neuro Psychiatrist

چھٹی بروز اتوار

0302-3524687
0317-6992102 (SMS)
091-2214005

کلیک: 209 - سید انور میڈیکل سنٹر، ڈگری گارڈن پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar



نوروسایکیاٹریسٹ
ڈاکٹر فیاض امیر
ایم بی بی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکٹری)
کھبر ٹیچنگ ہسپتال پشاور

ایجوکیشنل سب ڈیپارٹمنٹ، گورنمنٹ کالج، کراچی
ڈاکٹر فیاض امیر صاحب، ایم بی بی ایس، ایم سی پی ایس، ایم سی پی ایس (سائیکٹری)

Haider Ali Khan

NOT VALID FOR MEDICO LEGAL PURPOSE

Rx

22-05-2020

Follow-up-visit

Mood/on/off

Tab. Symbro 3mg

loss of interest

① 1-2-3

Sup. Trimetabol

2+2+2

Tab. Citanew. long

① 1-2-3

DR. FAYYAZ AMIR
Consultant
Neuro Psychiatrist
پشاور

0302-3524687
0317-6992102(SMS)
091-2214005

کیٹک: 209- سید انور میڈیکل سنٹر، ڈگری گارڈن پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
 MBBS, MCPS
 FCPS (Psychiatry)
 Khyber Teaching Hospital Peshawar

۵۵



نوروسائیکیاٹرسٹ
ڈاکٹر فیاض امیر
 ایم بی ایس، ایم سی پی ایس
 ایف سی پی ایس (سائیکیاٹری)
 خیبر ٹیچنگ اسپتال پشاور

اپنا مرض اور صواب دوا یا کی گزری ہوئی چیزیں لکھ کر دیکھ کر
 دیکھ کر دیکھ کر دیکھ کر دیکھ کر دیکھ کر دیکھ کر دیکھ کر

Haider Ali Khan

NOT VALID FOR MEDICO LEGAL PURPOSE

24-12-20

Rx
Follow-up-visit.

Towards
Improvement.

Low Intrest.

Weakness

Tab. Frenadol-D
 1 + 1

Tab. Citranaw
 10mg.

Tab. Nofense

۵۵

۵۵

DR. FAYYAZ AMIR
 Consultant
 Psychiatrist
 چھٹی بروجڈاؤن

0302-3524687
 0317-6992102(SMS)
 091-2214005

کلینک: 209 - سید انور میڈیکل سنٹر، ڈیگری گارڈن پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar

(14)



نور و سائیکیاٹرسٹ
ڈاکٹر فیاض امیر
ایم بی بی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکیاٹری)
خیبر ٹیچنگ ہسپتال پشاور

نور و سائیکیاٹرسٹ صاحب خان کٹرہی تہہ پشاور کٹرہی
ایف سی پی ایس (سائیکیاٹری) خیبر ٹیچنگ ہسپتال پشاور

Haider Ali Khan

NOT VALID FOR MEDICO LEGAL PURPOSE

Rx Olitral

20/04/2021

Following up with

Major depressive illness

Feb. Alp. O. Sing

low mood

@ روزانہ رات کو

comparatively
improved

Tab. Prozac

2mg.

@ روزانہ

WIP

[Signature]

چھٹی بروز اتوار

0302-3524687
0317-6992102(SMS)
091-2214005

راپٹہ ہرز

کلینک 209- سیدانور سید یکل سنٹر، ڈبگری گاڑون پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar



نوروسائیکیاٹرسٹ
ڈاکٹر فیاض امیر
ایم بی بی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکیاٹری)
خیبر ٹیچنگ ہسپتال پشاور

ایمر فاضل صواب دانا کی گورننگ بڈ پر مشتمل سرکاری
ہسپتالی سائنس دانوں کی طرف سے تیار کیا گیا ہے۔

Hades Al Kae

NOT VALID FOR MEDICO LEGAL PURPOSE

Rx *clinical*

15/12/2021

Follow-up visit

Depressive illness

Patient improved
as compared
to the previous
symptoms.

① Tab. Prozac
20mg

② Tab. A/P. 0.5mg
initial ①

③ Tab. Subex
- 2

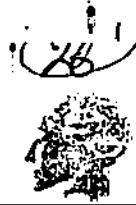
— 15/12

اپنی مرضی پر روزانہ

0302-3524687
0317-6992102 (SMS)
091-2214005

کلینک: 209 - سیدانور میڈیکل سنٹر، ڈگری گارڈن پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar



ایم ایف سی ایس (سائیکوزی) کی طرف سے طبیات و طبقات
کی طرف سے ماسٹر آف سائیکوزی کی طرف سے ماسٹر آف سائیکوزی

نوروسائیکیاٹرست
ڈاکٹر فیاض امیر
ایم ایف سی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکوزی)
خیبر پختونخوا ہسپتال پشاور

Haider Ali Khan

NOT VALID FOR MEDICO LEGAL PURPOSE

Rx

23-11-22

23-11-22

Follow up visit

Dresspino jallias

Low of Mood

Low of interest

Tab. Serwit
5mg
① بار

Tab. Seribro
3mg
① بار

Tab. Dalbi 2mg
1 1/1

DR. FAYYAZ AMIR
Consultant
Neuro Psychiatrist

0302-3524687
0317-6992102(SMS)
091-2214005

کلیک: 209- سیدانور میڈیکل سنٹر، ڈگری گارڈن پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar

AT



این سند برای مصافحہ عدالتی کی گواہی ہے۔ ہر قسم کے سرکاری
دفعہ شدہ اور قانونی مقاصد کے لیے اسے استعمال کیا جاسکتا ہے۔

نور و سایگان نرسٹ
ڈاکٹر فیاض امیر
ایم بی بی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکیاٹری)
خیبر ٹیچنگ ہسپتال پشاور

Haider Ali Khan

VALID FOR MEDICO LEGAL PURPOSE

12-12-23

^{Rx}
Follow-up visit.

Improved
Mild Depressive
illness

(1) Tab. Sont 25mg

① روزانہ

(2) Tab A/P 0.25mg

② روزانہ

(3) Tab. Contem

③

(4) Tab. Suvbex-2

④ روزانہ

چھٹی بروز اتوار

0302-3524687
0317-6992102(SMS)
091-2214005

کلینک: 209 - سید انور میڈیکل سنٹر، ڈگری گارڈن پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar

١٥

اپوزیشن صاحب دوا گاہ کے لئے صرف اور صرف طبی مقاصد کے لئے ہے۔ اس کا استعمال غیر طبی مقاصد کے لئے ممنوع ہے۔

نوروسائیکاٹریسٹ
ڈاکٹر فیاض امیر
ایم بی بی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکاٹری)
کھبر ٹیچنگ ہسپتال پشاور

Haider Ali Khan

NOT VALID FOR MEDICO LEGAL PURPOSE

^{Rx}
Follow-up visit

3/4/2023

Improved

Depressive illness

Tab. Serf. Song

١٠ روزانہ

Tab. Sonabong

١٠ روزانہ

Tab. Zolofong

١٠ روزانہ

Tab. Serlafong

١٠ روزانہ

١١/١١

DR. FAYYAZ AMIR
Consultant
Neuro Psychiatrist
کھبر ٹیچنگ ہسپتال پشاور

0302-3524687
0317-6992102(SMS)
091-2214005

کلینک: 209 - سید انور میڈیکل سنٹر، ڈگری گارڈن پشاور کینٹ

Neuro Psychiatrist
Dr. Fayyaz Amir
MBBS, MCPS
FCPS (Psychiatry)
Khyber Teaching Hospital Peshawar

(M)



اپریشن صاحب دوا کی ترقی کے لئے ضروری ہے۔
وہاں مندرجہ ذیل دواؤں کو صرف طبیات، نشتات و مشاہدات

نوروسائیکیاٹرسٹ
ڈاکٹر فیاض امیر
ایم بی ایس، ایم سی پی ایس
ایف سی پی ایس (سائیکیاٹری)
خیبر تھننگ ہسپتال پشاور

Haider Ali Khan

NOT VALID FOR MEDICO LEGAL PURPOSE

16/4/2024

Hx of Depressive
illness.

follow up visit.

Suppression fully
improved
and recovered

from psychiatric
illness.

Normal.

Tab. Serit. 25mg

0 1/2 @ 1/2

Tab. Surbet-2

0 1/2 @ 1/2

Tab: Essium

4mg

DR. FAYYAZ AMIR
Consultant
Neuro Psychiatrist

0302-3524687
0317-6992102(SMS)
091-2214005

کلینک: 209- سیدانور میڈیکل سٹریٹ، گارڈن پشاور کینٹ

(30)

"E"
Annex-e

Dairy No 580/PSO
27/5/2024

091-9223674

THE PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA AT CIVIL SECRETARIATE
PESHAWAR.

SUBJECT: DEPARTMENTAL APPEAL / REPRESENTATION FOR RE-
INSTATEMENT INTO SERVICE ALONG WITH ALL BACK
BENEFITS

PRAYER; ON ACCEPTANCE OF THE INSTANT DEPARTMENTAL APPEAL THE IMPUGNED OFFICE ORDER DATED; 11-01-2019 OF DISTRICT POLICE OFFICER, CHITRAL LOWER AND ALL SUBSEQUENT PROCEEDINGS BE SET ASIDE AND THE APPELLANT BEING MEDICALLY AND PHYSICALLY FIT BE RE-EXAMINED BY MEDICAL BOARD & RE-INSTATED IN SERVICE WITH ALL BACK BENEFITS. ANY OTHER RELIEF DEEMS JUST AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO GRANTED TO THE APPELLANT.

RESPECTFULLY STATED;

Facts and Grounds giving rise to the instant departmental appeal are as under;

1. That the appellant in performance of his official duties remained in police services as sepoy from 31-12-2010 till 11-01-2019 and posted at different risky places of Chitral boarders for the above period of 8 years.
2. That the appellant was in performing of his duties with great zeal, zest, devotion and dedication at his level best to the entire satisfaction of his superior's tenure of service in the subject post was exemplary and outstanding with effect to improve the entire system of maintenance, administration and discipline. Furthermore, his excellent service at Chitral Police has been highly appreciated by high ups of the department with effect to assure task given by high ups in security, essential relief to flood and earth quick effectees of the district in 2015 disaster.
3. That the Facts relevant for the purpose of this appeal are that Haider Ali Khan, (The Appellant) was serving in Police Department as Constable, in District Chitral. when he was found suffering from a psychiatric-disease which rendered him unfit for the proper and efficient discharge of his duties. The appellant, therefore, appeared

before a Medical Board. Accordingly, on 26-12-2018 declared him unfit for further useful discharge of his duties. A Standing Medical Board issued on Invaliding-Certificate declaring him incapacitated for further service in the Department for indefinite period. Consequently, the District Police Officer, Chitral retired him from service with effect from 11-01-2019 vide order bearing No. 369-77 E-II. Copy SMB Letter and Copy of Retirement from service are attached as Annexure "A" & "B".

4. That the Appellant made an application to the District Police Officer, Chitral for arrangement of his medical examination for the purposes of enabling him to rejoin the department because his health is improved and he is medically and physically fit to perform job. On his repeated applications the DPO Chitral office not responded a single one, lastly, he made application to the Regional Police Officer Malakand, which was also not been informed him. Ultimately the appellant having no alternate and efficacious remedy; the instant appeal among the following grounds;

GROUNDS:

- a. That admittedly there is no case exist, established or connect the appellant with any offence, miss conduct or negligence with effect to liable him for any departmental proceeding or penalty neither the ground of allegation is punishable, therefore to proceed and imposition of major penalty of compulsory retirement is void ab initio, illegal, unlawful and ineffective upon the terms and conditions of service of the appellant.
- b. There is no bar to the re-employment of an employee who has regained health after obtaining invalid-pension, or if an employee is invalided as being incapacitated for employment in a particular branch of the service, to his re-employment in some other branch of the service. The rules in such a case as to refunding gratuity, drawing pension, and counting service, the same as in the case of re-employment after compensation pension.
- c. That the facts whereof are identical with the appellant case, the Higher Courts well settle principles, that; initially declared medically unfit remained out of service for many years, was ordered to be re-instated

into service subject to re-examination and medical fitness by the Board. And there is no legal bar for arrangement of medical board for the re-examination of the appellant.

- d. That the appellant has rendered about 8 years exemplary and outstanding service to the Department and is qualified committed and entitle to continue his remaining service till with all pending and upcoming promotions.
- e. That the appellant has been retired prematurely irrespective of the fact that the appellant is entitled for Re-instatement to the next higher grade as sufficient number of posts are still laying vacant.
- f. That any other ground be furnished whenever required for the assistance of your good authority in support of his appeal.

It is, therefore, humbly prayed to allow the subject departmental appeal as prayed for.

Dated: - 27-05-2024

Haider Ali Khan
Appellant

Haider Ali Khan
Chitral-Lower, Police
Resident of Bakamak District Lower Chitral
Cell No. 0346-1387334

میں نے اس پر غور کیا ہے۔
میں نے اس پر غور کیا ہے۔
میں نے اس پر غور کیا ہے۔

(۶) میں نے اس پر غور کیا ہے۔
میں نے اس پر غور کیا ہے۔

(۷) میں نے اس پر غور کیا ہے۔
میں نے اس پر غور کیا ہے۔

(۸) میں نے اس پر غور کیا ہے۔
میں نے اس پر غور کیا ہے۔

(۹) میں نے اس پر غور کیا ہے۔
میں نے اس پر غور کیا ہے۔

میں نے اس پر غور کیا ہے۔

میں نے اس پر غور کیا ہے۔

(۳۳) میں نے اس پر غور کیا ہے۔

قسم اولیٰ از کتاب - x3
مدرسه عالی

۲۶ -

مدرسه عالی

مدرسه عالی
سال ۱۳۱۹

۱۳۱۹

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مدرسه عالی (۱۶)

WAKALAT NAMA

35

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICES TRIBUNEL, PESHAWAR

Service Appeal

No. _____/2024

Haider Ales Khan

V E R S U S

Inspector General of Police

I/we Haider Ales Khan S/o Samander the above-named accused /Petitioner /Appellant/respondent/defendant do hereby appoint and constitute **SHER HYDER KHAN**, Advocate as counsel in the above mentioned case, to do all or any of the following acts, deeds and things:-

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

AND HEREBY AGREE:-

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

In witness whereof I/We have signed this power of Attorney/Wakalat Nama hereunder the contents of which have been read/explained to me/us and fully understood by me / us this

3 Day of September 2024 at Peshawar.

[Signature]

Signature of Executants

Accepted subject to term regarding payment of fee.

SHER HYDER KHAN
Advocate High Court, Peshawar
BC No. BC-17-7888/CNIC No. 15202122492279
Off:- Judicial Complex, Khyber Road Peshawar
Off:- 0333-3365659, H.C.B No.091-9210186
Mob:- 0336-9377022



[Signature]
I). SIDRA NAZIR
Advocate High Court
BC-17-8058

[Signature]
II). KAMRAN UMBER
Advocate Peshawar
BC-10-9831