

7. *That all the three ingredients are in favour of the answering respondent.*

On Facts:-


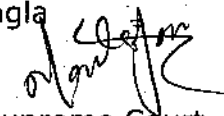
1. *That Para No 1 of the application need no reply.*
2. *Para No 2 of the application pertains to record, hence need no reply.*
3. *Para No 3 of the application is incorrect, hence denied. All the three ingredients necessary for the stay are in favour of the replying respondent. The appellant was adjusted against the post of MS THQ Hospital SPMK Puran Shangal on the basis of OPS, it is further to bring into the notice of this Honorable Tribunal that it is the prerogative of the competent authority to post a civil servant on OPS as a stop gap arrangement, however, the civil servant has no right to claim vested right on the basis of OPS, he may be transferred from the post as and when the competent authority deems fit as Shangal is hard area and normal tenure for hard areas is one year, whereas the appellant even on the basis of OPS, the appellant remained posted and spent two years on the said post, therefore, the appellant has no right to claim further posting on the same post.*

4. Para No 4 of the application pertains to official respondents, however the replying respondent assumed the charge on 10/08/2024 and since than performing his duties with full devotions. (Copies of charge report and other documents issued by replying respondent are attached as annexure "A" & "B").

It is, therefore, requested that the application may kindly be dismissed with costs

Dated:- 25/09/2024

Through:-


Private Respondent No 4
Dr. Iftikhar MO THQ Hospital
Puran Shangla

Naila Jan
Advocate Supreme Court

AFFIDAVIT:-

It is, stated on oath that the contents of the accompanying reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

DEPONENT





GOVERNMENT OF KHYBER PAKHTUNKHWA
CERTIFICATE OF TRANSFER OF CHARGE.

A
4

Certified that I, Dr. IFTIKHAR AHMAD CO-ORDINATOR LHW PROG: BPS-17

Have this day before noon taken over charge of the office look after the work of MS THQ
After relinquished

SPMK THQ Hospital Puran District Shangla With reference to the Order of the

Khyber Pakhtunkhwa Government No. SOH (E-V)2-2/2024 6317-24 Dated: 06th

August, 2024

Transferring Mr. _____

To _____

Particulars of cash and important / Secret / Confidential documents handed over / taken over are noted on the reverse.

Signature of relived
Government Servant _____

Station, SPMK THQ (H) Puran

Designation:- _____

Dated:- 09/08/2024

Signature of Government
Servant receiving
Charge _____

Designation, Coordinator LHW Prog: BPS-17

Endos No. 471-79 /MS/SPMK (Puran)/PF

Dated 10/08/2024

From:

Medical Superintendent
SPMK Category "C" Hospital Puran Shangla.

To:

1. The Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. The Regional Director Health Malakand Division at Makarbagh Swat.
3. The PS to Secretary Health Govt. of Khyber Pakhtunkhwa Peshawar.
4. The Deputy Commissioner District Shangla.
5. The District Health Officer District Shangla.
6. The District Accounts Officer Shangla.
7. The A/C Section of this office.
8. The concern officer Personal File.

The charge of the office of MS Category "C" Hospital Puran Shangla

Was transfer from Dr. IFTIKHAR AHMAD COORDINATOR LHW PROG: BPS-17

To _____

On the fore noon of the 09/08/2024

[Signature]
MEDICAL SUPERINTENDENT
SPMK Cat: "C" HOSPITAL
PURAN SHANGLA

[Signature]
ATTESTED

5



OFFICE OF THE MEDICAL SUPERINTENDENT
SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C"
HOSPITAL PURAN DISTRICT SHANGLA.

Email: Spmkh.puran@gmail.com

Phone: 0996-853153

No. 727-70/MS/SPMK(H)HMC

Dated. 21/10/2024.

To,


The District Health Officer
District Shangla.

Subject:- REPLACEMENT OF HMC CHAIRMAN

R/Sir,

In light of the transfer of Dr. Ghafoor Ahmad Ex-Medical Superintendent SPMK Category "C" Hospital Puran, vide Secretary Health Government of Khyber Pakhtunkhwa Peshawar office Notification No. SOH9E-V)2-2/2024/ 6317-24 dated 6th August 2024.

Therefore you are requested to please notify the Dr. Iftekhar Ahmad Medical Superintendent / the undersigned as Chairman of Health Management Committee of SPMK Category "C" Hospital Puran in the best public interest.



MEDICAL SUPERINTENDENT
SPMK Cat: "C" Hospital
Puran Shangla.

Endost: No & Date Even:

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. Regional Director General Health Malakand Division at Swat.
3. Deputy Commissioner District Shangla.

For information please.


MEDICAL SUPERINTENDENT
SPMK Cat: "C" Hospital
Puran Shangla.


ATTESTED



OFFICE OF THE
DISTRICT HEALTH OFFICER DISTRICT SHANGLA
AT ALPURA

Our Faith Corruption Free Pakistan

☎ - 0996- 850653 ☎ - 0996- 850824

E-mail:ndohshangla@gmail.com

DHO Shangla
DHO Shangla

6

No. 3594-99 /DHO/SH/PCMC/24/7

Dated: 28 /08/2024

NOTIFICATION:

Reference to the Health Department Notification No. SOG HO 1-35/Gen.Notification/2024/1601 Dated: 15-07-2024. The undersigned has been pleased to revise the following Health Care Management Committees (HMCs), of District Shangla with the composition noted against each, with immediate effect, in the best public interest.

1- HMC SPMK Cat: C Hospital Puran

S No	Name	Designation
1	Dr. Hishar Ahmad (MS)	Chairperson
2	Dr. Riaz Ahmad (DMS)	Secretary
3	Dr. Najma Begum (WMO)	Member
4	Tehsil Municipal Officer (TMO)	Member
5	Mr. Liaqat Ali (Community Representative)	Member
6	Dr. Tariq Ahmad (Community Representative)	Member
7	Miss. Rifaqat LHV (Female member)	Member

2-Cat: D Hospital Bisham

S No	Name	Designation
1	Dr. Mansoor Ahmad (MS)	Chairperson
2	Dr. Sanaulah (DMS)	Secretary
3	Dr. Shafiq Ali (WMO)	Member
4	Tehsil Municipal Officer (TMO)	Member
5	Dr. Muhammad Sohail (Community Representative)	Member
6	Mr. Ikram Shah (Community Representative)	Member
7	Miss. Razia Shahid LHS (Female Member)	Member

3-Cat: D Hospital Chakisar

S No	Name	Designation
1	Dr. Dil Nawaz (MS)	Chairperson
2	Dr. Yasir Alam (DMS)	Secretary
3	Dr. Latafat Nasim (WMO)	Member
4	Tehsil Municipal Officer (TMO)	Member
5	Mr. Shabir Ahmad (Community Representative)	Member
6	Mr. Sher Afghan (Community Representative)	Member
7	Miss. Mussarat LHV (Female member)	Member

The above committees shall function in accordance with the approved guidelines issued by the government of Khyber Pakhtunkhwa time to time.

Sdxxx.

DISTRICT HEALTH OFFICER
SHANGLA

Endst: No. & Date Even:

Copy forwarded for information to:

- 1- The Secretary Govt. of Khyber Pakhtunkhwa Health Department, Peshawar.
- 2- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3- The Regional Director Health Malakand at Swat.
- 4- The Deputy Commissioner, Shangla.
- 5- The above Named Officers/officials and community members.
- 6- The Manger Bank of Khyber Alpura, Puran and Bisham Branch.

ATTESTED

DISTRICT HEALTH OFFICER
SHANGLA



**OFFICE OF THE MEDICAL SUPERINTENDENT
SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C"
HOSPITAL PURAN DISTRICT SHANGLA.**

Email: spmkh.puran@gmail.com Phone: 0992-841151

No. 356-2024 IMS/SPMK(H)/HMC

Dated. 30/10/2024

7

To,


The Manager
Bank of Khyber Atoch Puran

Subject: REPLACEMENT OF HMC CHAIRMAN.
Memo,

Reference to the District Health Officer District Shangla Notification No 3594-99/DHO/SH/PCMC/24/7 dated 28/08/2024, regarding the replacement of Chairman of HMC SPMK Category "C" Hospital Puran and others.(Copy attached)

Therefore your honour is humbly requested to please consider the Signature of the newly Chairman of Health Management Committee of SPMK Category "C" Hospital Puran in the best public interest. The specimen signature of the New Chairman HMC SPMK Category "C" Hospital Puran as is under.

1. _____
2. _____
3. _____

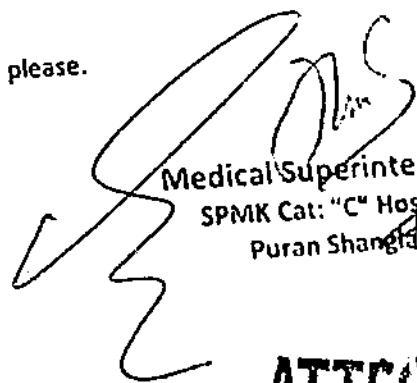

Medical Superintendent
SPMK Cat: "C" Hospital
Puran Shangla.

Endost: No & Date Even:

Copy forwarded to the:-


1. Director General Health Serveries Khyber Pakhtunkhwa Peshawar.
2. Regional Director Health (Malakand) at Taimargara.
3. Deputy Commissioner District Shangla.
4. District Health officer District Shangla.

For information please.


Medical Superintendent
SPMK Cat: "C" Hospital
Puran Shangla.

ATTES

6. The Manger Bank of Khyber Alpura, Puran and Bisham Branch.


DISTRICT HEALTH OFFIC
SHANGLA.



OFFICE OF THE MEDICAL SUPERINTENDENT
SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C"
HOSPITAL PURAN DISTRICT SHANGLA.

8

Email Spmkh puran@gmail.com

Phone: 0998 853151

No. 8693-1/1/MS/SPMK(H).

Dated. 22/09/2024.

Subject: - MEETING / IJLAS.

Memo

It is stated that the Hospital Management Committee (HMC) meeting/Ijlas (24) has been scheduled to be held on 02/09/2024 under the chairmanship of the undersigned at Medical Superintendent Office of SPMK Category "C" Hospital Puran at 11:00AM.

Therefore you are requested to please attend/ ensure your presence for the subject meeting/Ijlas on mentioned date venue and time below.

Date of meeting. 02/09/2024.
Venue. MS Office SPMK Cat:"C" Hospital Puran.
Time. 11:00AM.

The committee members are following.

- | | | |
|----------------------|-----|-------------------|
| 1. Dr.Iftikhar Ahmad | MS | Chairperson. |
| 2. Dr.Riaz Ahmad | DMS | Secretary/Member. |
| 3. Dr. Najma bogum | WMO | Member. |
| 4. TMO Puran | | Member. |
| 5. Mr.Liaqat Ali | | Member. |
| 6. Dr.Tariq Ahmad | | Member. |
| 7. Mrs.Rafaqat bibi | LHV | Member. |

MEDICAL SUPERINTENDENT
SPMK Cat: "C" Hospital
Puran Shangla.

Endost: No & Date Even:

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. Regional Director Health (Malakand).
3. Deputy Commissioner District Shangla.
4. District Health officer District Shangla.
5. Focal Person Health management Committee Shangla.
6. The above members of HMC committee.

For information please.

MEDICAL SUPERINTENDENT
SPMK Cat: "C" Hospital
Puran Shangla.

ATTESTED

9



OFFICE OF THE MEDICAL SUPERINTENDENT
SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C"
HOSPITAL PURAN DISTRICT SHANGLA

Email Spmkh.puran@gmail.com Phone 0998 853151

No. 587-72 /MS/SPMK(H).

Dated. 3 / 9 / 2024.

MINUTES OF THE MEETING.

Meeting:- Health Management Committee (HMC) 24th Meeting.
Agenda:- Purchase of Batteries, Repair of stabilizers/Electricity, purchase new UPS, Purchase of Life Saving Drugs/Emergency Drugs for Emergency Unit, Hiring Electrician daily wages bases and purchase of Contingency Item, Equipment's/ Items repair
Venue:- Office of the Medical Superintendent SPMK Category "Hospital Puran.
Timing:- 11.00(AM).
Date:- 02/09/2024.

Meeting started with few verses from Holy Quran. Meeting chaired by Dr.Iftikhar Ahmad Medical Superintendent SPMK Category "C" Hospital Puran District Shangla, (Chairperson HMC) and the following participants have attended the meeting.

- | | | |
|----------------------|---------------|-----------|
| 1. Dr.Iftikhar Ahmad | MS | Chairman |
| 2. Dr.Riaz Ahmad | DMS | Secretary |
| 3. Dr.Najma Begum | WMO | Member |
| 4. Rep: of TMO | TMO | Member |
| 5. Mr.Liaqat Ali | Local Notable | Member |
| 6. Dr.Tariq Ahmad | Local Notable | Member |
| 7. Mrs.Rifaqat bibi | Local Notable | Member |

K. Ahmad
ATTESTED

The Chair welcomed all the participants after threadbare discussion. The following decision has been made.

S#	Agenda Point	Discussion	Decision	Responsibility
1	1. Purchase of Batteries for UPS X-Ray Department. 2. Repair of stabilizer/Electricity,	Being the Chairperson Dr.Iftikhar Ahmad briefed all the members of HMC regarding the objectives, purpose, targets, goals, achievements, of HMC at SPMK Category "C" Hospital Puran. It was discussed	The Chairman, Secretary and members of HMC SPMK Category "C" Hospital Puran decided and agreed to	Chairperson and Secretary of Health Management Committee of SPMK Category "C" Hospital

SECRETARY (HMC)
SPMK CAT "C" Hospital
Punan District Shanghai

CHRISTOPHERSON (HMC)
SPMK Category "C" Hospital
Punan District Shanghai

The Chair reiterated that the above decisions must be followed with true spirit, the meeting ended with the votes of thanks to and from the Chair.

<p>1. ... 2. ... 3. ... 4. ... 5. ... 6. ... 7. ... 8. ... 9. ... 10. ...</p>	<p>1. ... 2. ... 3. ... 4. ... 5. ... 6. ... 7. ... 8. ... 9. ... 10. ...</p>	<p>1. ... 2. ... 3. ... 4. ... 5. ... 6. ... 7. ... 8. ... 9. ... 10. ...</p>	<p>1. ... 2. ... 3. ... 4. ... 5. ... 6. ... 7. ... 8. ... 9. ... 10. ...</p>
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ATTESTED

10



OFFICE OF THE MEDICAL SUPERINTENDENT
SHAHEED PIR MOHAMMAD KHAN, CATEGORY "C"
HOSPITAL PURAN DISTRICT SHANGLA.



OFFICE OF THE MEDICAL SUPERINTENDENT
SHAHEED PIR MOHAMMAD KHAN CATEGORY "C"
HOSPITAL PURAN DISTRICT SHANGLA.

11

Phone: 0996 853151

Spmkh.puran@gmail.com


No. 949 SL /MS/THQ.

Dated 7 / 7 / 2024

OFFICE ORDER.

Consequent upon the recommendation/Approval of the Hospital Management Committee in its meeting held on 02/09/2024 under the Chairmanship of the undersigned, and dire need of electrician to SPMK Category "C" Hospital Puran, the following daily wages are hereby directed to work under the control of the undersigned as electrician till further order in the large interest of Hospital as well as public, with effect from 02/09/2024.

S.No	Name	Father Name	Position	Resident	Monthly Salary
1	Mr.Salman	Mr.Abdul Wahab	Electrician	Nimkalay Puran	20000/-


Dr. Itikhar Ahmad
MEDICAL SUPERINTENDENT
SPMK Cat: "C" Hospital
Puran Shangla.


Endost:No & Date Even:-

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa Peshawar
2. Regional Director Health Malakand Division at Mingora Swat.
3. Deputy Commissioner District Shangla.
4. District Health Officer District Shangla with the request to please grant approval in the best public interest as well as smooth running of the Hospital.
5. Official concerned.
6. Master File.

For information please.


ATTESTED


MEDICAL SUPERINTENDENT
SPMK Cat: "C" Hospital
Puran Shangla.

RECEIVED
 FEDERAL BUREAU OF INVESTIGATION
 U.S. DEPARTMENT OF JUSTICE

RS 46 220

40000	Section of Sub Voucher
40001	Postage & Telegram
40002	Telephone & Transmission
40003	Electricity
40004	Hot & Cold Water Charges
40005	Rent of Office Building
40006	Registration
40007	Traveling Expenses
40008	Transportation of Goods
40009	Post Charges
40010	Stationery
40011	Printing & Publication
40012	News Papers Periodicals Books
40013	Uniform & Protective Clothing
40014	Advertising & Publicity
40015	Payment to Other for Services
40016	Purchase of Drug Inoculation
40017	Medical Gas Charges
40018	Others Contingencies
40019	IT Equipment
40020	Lab Equip. Motor
40021	General Office Chemicals
40022	Special Tools & Hand Instruments
40023	Trap, Dish & Allied Plumbing
40024	Purchase of Plant & Machinery
40025	Purchase of Furniture & Fixtures
40026	Transport Repair
40027	Machinery & Equipment Repair
40028	Furniture & Fixture Repair
40029	Building Repair
40030	Maintenance

Total

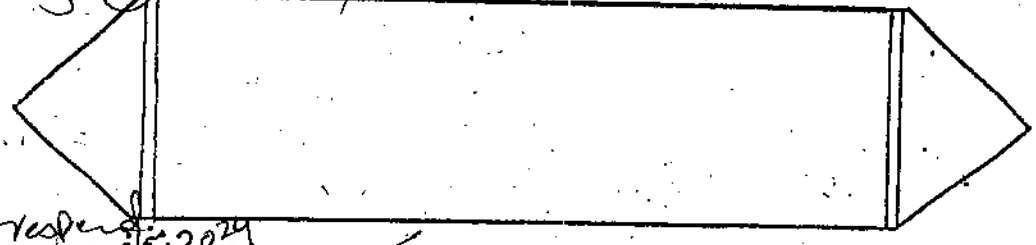
RS 46 220

APPROVED FOR

(12)

ECI

بعدالت صواب کا سرسری بطور میں لکھا



Private Respondent
No. 4
ڈاکٹر منظور احمد خان صاحب
محکمہ حکومت

موزونہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام رشتہ دار کیلئے جانے جان

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 ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
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 بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پر داخست منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حدیث سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

ڈاکٹر منظور احمد
Private Respondent
No. 4

المرقوم 25
ماہ 09
2024

واہ العباد

کے لئے منظور ہے۔

مقام
شمار
Accepted
Naeefan
asc