

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

C.M No. \_\_\_\_\_/2024  
In  
Service Appeal No.908/2024

Muhammad Ibrahim.....**Appellant**

**V E R S U S**


Director Education & others.....**Respondents**

**I N D E X**

<b>S#</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Application		1-2
2.	Copy of relevant documents		3-14

Applicant/Appellant

Through

  
**Jehan Afsar Pinda Khel**  
Advocate High Court  
**Cell No.0333-9433554**

Dated 25.09.2024

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

C.M No. \_\_\_\_\_/2024  
In  
Service Appeal No.908/2024

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 16027

Dated 25-09-24

Muhammad Ibrahim.....**Appellant**

**V E R S U S**

Director Education & others.....**Respondents**

**APPLICATION FOR PLACING ON FILE  
ADDITIONAL DOCUMENTS IN ABOVE  
TITLED SERVICE APPEAL**

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**Respectfully Sheweth:**

The applicant humbly submits as under:

1. That the titled service Appeal is pending adjudication before this Hon'ble Tribunal which is fixed for ~~26~~ 25.09.2024.
2. That the applicant/petitioner wants to place on file certain important additional documents which were to inadvertently left at the time of filing of the instant service appeal. **(Copy of relevant documents are annexed).**


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3. That the annexed documents/annexures are necessary for the just disposal of the titled appeal.
4. That there is no legal bar on acceptance of this application.

It is, therefore, most humbly prayed that on acceptance of the instant application, the above annexed documents may kindly be place on record.

Applicant/Appellant

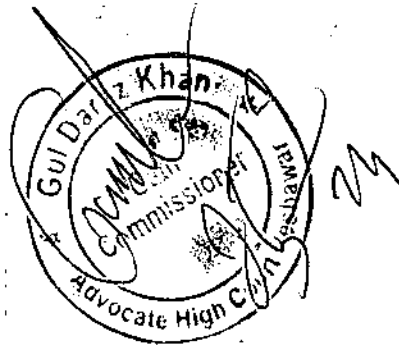
Through


  
**Jehan Afsar Paindakhel**  
Advocate High Court  
**Cell No.0333-9433554**

Dated 25.09.2024

**AFFIDAVIT**

I, Jehan Afsar Paindakhel Advocate High Court, do hereby solemnly affirm and declare that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



  
**DEPONENT**  
**Cell No.0333-9433554**

3

**LIST OF TEACHING STAFF SENIOR C.T AND C.T GHS NO. 02 HARIPUR**

S. No	Name of Teacher	Taking over Charge in GHS No. 02 Haripur	Tenure
01	Syed Zaheer Shah	06-04-2006	17 Years
02	Zulfiqar Ahmed	01-08-2010	13 Years
03	Khalil ur Rehman	06-11-2011	12 Years
04	Habib Shah	31-05-2012	11 Years
05	Ali Zahid	31-03-2012	11 Years
06	Rafique Ahmed	11-11-2012	11 Years
07	Muhammad Saddique	04-04-2015	08 Years
08	Muhammad Shabir	16-05-2016	07 Years
09	Rashid Khan	01-08-2017	06 Years
10	Atif Qazi	01-01-2018	05 Years
11	Hasrat Mehmood	28-09-2018	05 Years
12	Muhammad Irshad	01-08-2017	02 Years
13	Fazal-e-Mabood	06-11-2021	02 Years
14	Muhammad Banaris	09-11-2021	02 Years
15	Muhammad Ibrahim	10-03-2023	01 Year
C.T			
16	Tariq Mehmood	04-08-2016	07 Years
17	Shoukat Mehmood	03-02-2017	06 Years
18	Fiaz Mehmood	09-09-2017	06 Years
19	Shahzar Aslam	09-09-2020	03 Years
20	Khurshid Ahmed	07-07-2021	02 Years

**ATTESTED**

(4)

✓

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER(MALE) ABBOTTABAD.

MUTUAL TRANSFER

OFFICE ORDER NO. 233  
DATED ABBOTTABAD, THE 19/12/93

Mutual transfer between Mr. Muhammad Ibrahim PTC Government Primary School, Lakotri and Garvaiz Akhtar PTC Government Primary School, Chatti is hereby ordered on their own pay and BPS, in the interest of public service with effect from the date of their taking over charge.

Note: - 1. Charge reports should be submitted to all concerned.  
2. NO TA/DA is allowed to any one.

(SYED MUSHTAQ HUSSAIN SHAH)  
SUB DIVISIONAL EDUCATION OFFICER(M)  
ABBOTTABAD SUB DIVISION ABBOTTABAD.

Enclst No. 15577-82

Copy to the:-

1. P.A. to Minister for Education NWFP.
2. District Education Officer(M) Primary Abbottabad.
3. 4. Headteacher concerned Schools.
5. ASDEO concerned Schools.
6. O.O. file.

*[Signature]*  
SUB DIVISIONAL EDUCATION OFFICER(M)  
ABBOTTABAD.

**ATTESTED**

(49)

(5)



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER(MALE) ABBOTTABAD.  
TRANSFER/ADJUSTMENT.

OFFICE ORDER NO. 73  
DATED ABBOTTABAD, THE 7-5-1993

Mr. Muhammad Ibrahim PTC, Government Primary School, Sothi  
is hereby transferred to Government Primary School, Nakotri in  
Mr. Muhammad Salim PTC already transferred to Government Primary  
Jarral vide this office order No. 70 dated 28/4/93, in the  
Public service with immediate effect.

- Notes: 1. Charge reports should be submitted to all concerned.  
2. NO TA/DA is allowed to him.

SUB. DIVISIONAL EDUCATION OFFICER(M)  
ABBOTTABAD.

Endst No. 3602-07

- Copy of the above is forwarded to the:-  
1. District Education Officer(M) Primary Abbottabad.  
2. Accountant local office.  
3-4. Headteacher concerned.  
5. Office order file.

SUB. DIVISIONAL EDUCATION OFFICER(M)  
ABBOTTABAD.

ATTESTED



Office of the District Officer (Male)  
Elementary & Secondary Haripur  
PH No. 0995-610178, 610268

**PROMOTION ORDER.**

Consequent upon the selection of candidates by the District Promotion Committee in its meeting held on 14.02.2013 and approval of the competent form, the promotion of the following trained PST's (Male) to CT post are hereby ordered in BPS-12 to BPS-15 (8500-700-29500) with usual allowances on regular basis as per new service structure @ 60 % promotion of CT post on merit basis as notified by the Govt. of Khyber Pakhtunkhwa E&SE Department Peshawar vide notification No. SO (PE)4-5/SSRC/Vol:III dated 18.01.2011 and revised notification dated 16.06.2011 in the schools as noted against the name of each on the terms & conditions mentioned below w.e.f the date of taking over charge in the best interest of public service.

S. No.	S.List No.	Name of teacher with address.	Place of posting.	Remarks.
01.	126	Muhammad Aslam PST GMPS Chothai II/Pur.	CT GHS Dartian II/Pur.	Against Vacant Post.
02.	146	Muhammad Zareen PST GPS Pandak II/Pur.	CT GMS Babootri II/Pur.	Against Vacant Post.
03.	175	Tahir Muhammad Farooq PST GPS No.1 Sec:2 KIS II/Pur.	CT <del>Kakoti</del> GHS Karipin Haripur. 1/10/12	Against Vacant Post.
04.	180	M.Sajdar Khan PST GMPS Babu Mohallah II/Pur.	CT GHS Kalinjar II/Pur.	Against Vacant Post.
05.	184	Abdul Shakoore PST GPS No.1 Sec:2 KIS II/Pur.	CT GMS Pakshahi II/Pur.	Against Vacant Post.
06.	199	Muhammad Ayub PST GPS Kotla.	CT GMS Kotla II/Pur.	Against Vacant Post.
07.	220	Muhammad Ayub PST GPS Nara Maroofian.	CT GHS Bail II/Pur.	Against Vacant Post.
08.	221	Habib Shah PST GPS Chanar Kol.	CT GHS Kundi II/Pur.	Against Vacant Post.
09.	249	Arif Khan PST GPS New Kharkot.	CT GHS Salm Khand II/Pur.	Against Vacant Post.
10.	257	Ajab Khan PST GPS Bandi Libial.	CT GHS Badhora.	Against Vacant Post.
11.	258	Muhammad Idrees PST GPS Roh.	CT GMS Kanereri II/Pur.	Against Vacant Post.
12.	279	Muhammad Siddique PST GPS Behra.	CT GMS Qazi pur II/Pur.	Against Vacant Post.
13.	304	Muhammad Arshid PST GPS Dhamkar Colony.	CT GHS Bail II/Pur.	Against Vacant Post.

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0-2

14.	318	Jiaz Ur Rehman PST GPS Kangra No.1	CT GHIS Jolian H/Pur.	Against Vacant Post.
15.	319	Badshah Hussain PST GPS Dhendah.	CT GMS Dhok Gakhran II/Pur.	Against Vacant Post.
16.	331	Habib Ur Rehman PST GPS Dev.	CT GMS Kaneer II/Pur.	Against Vacant Post.
17.	335	Qazi Atta Ul Haq PST GPS Akhon Bandi.	CT GMS Jalees II/Pur.	Against Vacant Post.
18.	352	Nisar Shah PST GPS Kheroach.	CT GMS Khabal II/Pur.	Against Vacant Post.
19.	363	Sarwar Khan PST GPS Sumbal Mohri.	CT GMS Kot Jandan II/Pur.	Against Vacant Post.
20.	378	Mehboob Elahi PST GPS Laddah.	CT GMS Halli II/Pur.	Against Vacant Post.
21.	380	Muhammad Younis PST GPS Bakka Jabi.	CT GMS Baghpur Dehri II/Pur.	Against Vacant Post.
22.	381	Saeed Ur Rehman PST GPS Golia Maira	CT <sup>Kakotri</sup> GHIS <sup>Kalinjan</sup> II/Pur.	Against Vacant Post.
23.	386	Khalid Ur Rehman PST GPS Sorri.	CT <sup>Basse Maira</sup> GMS <sup>Basse Maira</sup> II/Pur.	Against Vacant Post.
24.	390	Waris Khan PST GPS Gheba.	CT GHIS M.D.Maira II/Pur.	Against Vacant Post.
25.	392	Khani Zaman PST GPS Chajjian.	CT GMS Kohala Payeen II/Pur.	Against Vacant Post.
26.	419	Muhammad Taj PST GPS Bandi Syedan	CT GHS Thalikut II/Pur.	Against Vacant Post.
27.	425	Mumtaz PST GPS Noorpur.	CT GHIS Kakotri II/Pur.	Against Vacant Post.
28.	461	Muhammad Ibrahim PST GPS Kachi.	CT GHIS M.D.Maira II/Pur.	Against Vacant Post.

TERMS & CONDITIONS.

1. Their services can be terminated at any time, in case their performance is found unsatisfactory. In case of misconduct they will be proceeded against Under the Ordinance 2011 and rules framed from time to time by Govt.
2. They will be required to furnish copies of all their documents/Degrees along with the original receipts and photo copies, thereof pertaining to the verification Fee of the concerned examine body, boards/Universities to the appointing authority. The DDO concerned is directed that their pay should not be submitted to DAO Haripur till the verification of all certificates/NOC of appointing authority.
3. In case a document or documents is/are found fake or forged or bogus on such scrutiny or the verification the service of the concerned official shall be terminated. The whole amount paid to his as salary shall be recovered and a case against him shall be registered under relevant section of law.

PASHTAFIQ QAZI

*[Signature]*

**ATTESTED**

*[Signature]*  
DDO (M)




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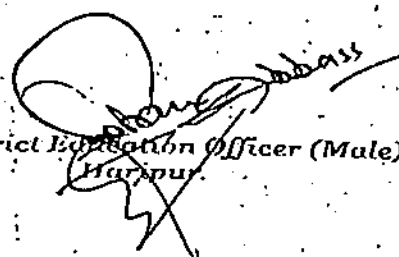
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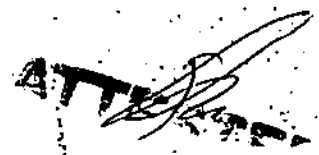
- Charge Reports should be submitted to all concerned.  
The posting for institutions where candidates have been appointed/posted will be transferable/adjustable to any other institution after completion of tenure.
8. The DDO concerned is responsible to preparation of their Service Books.
  9. They will not entitle to proceed any kind of leave during their probation period.
  10. The DDO concerned are directed to take undertaking regarding any over payment <sup>mistake</sup> found in future and will be recovered from his pension/gratuity.

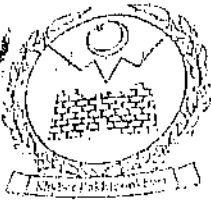
  
(Muhammad Shoukat) 16/2/13  
District Education Officer (Male)  
Haripur

Endst: No. 1278-1310 /Promotion-2013. Dated 16 /02/2013.

- Copy of the above is submitted for information to the:-
1. The Director E&SE Deptt: Khyber Pakhtunkhwa Peshawar.
  2. Senior District Accounts Officer Haripur.
  - 3-30 Principal/Headmasters concerned.
  31. Office files for record.

  
Dy; District Education Officer (Male)  
Haripur

  
ATTACHED



(a)

Office of District Education Officer (Male)  
Elementary & Secondary Education Haripur  
PH No. 0995-610178, 610268

**Order**

Consequent upon the approval of the competent authority the following mutual transfers of teaching staff of Elementary & secondary Education Department Haripur is hereby ordered mentioned against the name of each, on their own pay & grade in the best interest of public service with immediate effect.

S/No	Name & Address	From	To	Remarks
01	Iftikhar Ahmed CT	GMS Kachi	GMS Nelor	Vice S.No 2
02	Muhammad Ibrahim CT.	GMS Nelor	GMS Kachi	Vice S.No 1

Note:

01. Charge report should be submitted to all concerned.
02. No TA/DA or TG is allowed.

\_\_\_\_\_  
District Education Officer  
Elementary & Secondary Haripur

Endst No: 3002-03 -

Dated 09/03/2013

Cc:

1. The Senior Account Officer Haripur.
2. Headmaster concerned schools.
3. Office record file.

Deputy District Officer (Male)  
Elementary Education Haripur.

**ATTACHED**



OFFICE OF THE DISTRICT EDUCATION  
OFFICER (MALE) HARIPUR

Ph: 0995-920150, 920151, 920152  
Email: deomlchrp@gmail.com



ADJUSTMENT ORDER.

The adjustment of the following teaching/ministerial staff of Elementary & Secondary Education Department is hereby made on their own pay & grade in the best interest of public service with immediate effect.

S. #	Name & Designation	Transferred		Remarks
		From	To	
1	Zulfiqar S.CT	GHS Noor Pur	GHSS S.N.Khan	Against Vacant Post
2	Zia ur Rehman S.CT	GHS Badhora	GHS Kalinger	Against Vacant Post
3	Sakhawat Hussain Shah S.DM	GHSS Kakotri	GHSS S.N.Khan	Against Vacant Post
4	Waseem PET	GHS Dheenda	GHS Kag	Against Vacant Post
5	Muhammad Azam CT	GHS Kotehra	GHSS S.N.Khan	Against Vacant Post
6	Aamir Shahzad J.C	GHS Kangra Colony	GHS Dobandi	Against Vacant Post
7	Muneer Ahmed Qari	GHSS Bareela	GHS No.3 Haripur	Against Vacant Post

**Note: -**

1. Charge report should be submitted to all concerned.
2. TA/DA is not allowed to anyone.

-----sd-----  
District Education Officer (Male)  
Haripur

Endst: No. 1763-67 /F.No.1-3/EB/ Adjustment Order Dated: 14/6/2024

**Copy submitted to the: -**

1. Senior District Accounts Officer Haripur.
2. District Monitoring Officer (EMA) Haripur
3. Principal/Head Master concerned.
4. EMIS Branch Local Office.
5. Teachers concerned.
6. Office record file.

**ATTACHED**

District Education Officer (Male)  
Haripur



# Institute of Kidney Diseases Peshawar

Phase IV Hayatabad Peshawar  
Phone: 031-3231261-2

Page: 1 of 1

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## Patient OT Notes Report

MR No 94050623-3

Admission Date: 07 AUG 23 09:42:33

Patient Name: Abdur Rahim

Discharge Date:

Age | Gender: 56 Years, Male

Department: Urology

Team Name: Transplant

Admitted To: TRANSPLANT ICU BED NO 01

Procedure: POST TRANSPLANT DJS REMOVAL

Consultant: Dr Shahid Ahmad Khan

Surgeon: Dr Shahid Ahmad Khan

Nurse:

Assistant:

Anaesthesia: GA

OT Date 18 AUG-23

Anaesthesist:

Approach: ENDOSCOPIC PER URETHRAL

Finding: DJS INSITU, NORMAL URETHRA AND NORMAL BLADDER MUCOSA

Procedure: UNDER LA PATIENT CLEANED AND DRAPPED ABOVE FINDING NOTED, DJS REMOVAL DONE

Plain Notes:

**ATTENDED**

Blood Loss:

Drain:

Signature:

Consultant Nephrologist & Transplant Physician  
Assistant Professor

INSTITUTE BASED PRACTICE



Dr. Farman Ullah

MBBS, FCPS (Nephrology), CHR, CHPE (KMU)  
IKD Hayatabad Medical Complex Peshawar

Name Ahmed Rabin

Age 56 YR Date \_\_\_\_\_

CKD GN Tx Cyst.D

Dx

CIC

Post-transplant 2 day

DGP/SGoF

Now

- uncontrolled sugar
- Red Fingers
- Red Rbc level.
- Cid 2.5mg

O/E

BP 120/80

Pulse 86

Temp 110

J A C K L E T

SYSTEMIC EXAM

CVS S<sub>1</sub>+S<sub>2</sub>+0

CNS None

Abd Soft tend

Chest B/c clear

Adv

Adv  
Ck, K<sub>2</sub>P<sub>4</sub>, S.E  
...

① Tab. Deltacortil 5mg  
...

Tacogen

② Tab. Tacprol 1mg

(7-10mg/d) ... 2+2

③ Tab. Celcept 500mg

... 1/2 + 1/2

④ Tab Adalat LA 30-f

...

⑤ Tab CTX 450f

...

ATTESTED

⑥ Tab Septan 90/900 uf

...

⑦ Tab. Asc 75-f

...

⑧ Tab. Hurler R 10

12+12+10

⑨ Inj. Lantus 16

Dr. Farman Ullah  
...

...

13



Hyattahad Medical Complex  
DISCHARGE SLIP

Medical Record Number: K010003134093

Name: Adnan Raza  
Gender: Male  
Age: 56 Year(s)  
Address: KACHI Harpur Pakistan  
City: Harpur, Pakistan  
Person Phone: :  
Home Phone: :  
Admission No: K0124000053932  
Admission Date: 21-JUN-2024 10:13:14  
Admission Status: Elective  
Discharge No: :  
Discharge Date: 02-JUL-2024 12:07:06  
Discharge Status: Improved  
Primary Consultant: :  
Admitting Consultant: DR AINUL HADI

**Diagnosis During This Admission:**

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

abdominal pain and distension  
constipation  
erectile  
Management During Admission :  
iv fluids,  
antibiotics  
analgesia  
ppr

**Condition at Discharge:**

Improved

**Medications to Take at Home:**

Medications to Take at Home:	Instructions	Remarks
1 Metronidazole Tablets 400 mg	Take ONE tablet by mouth three times a day for 10 days	2 L @ 10 A @ 2ml of 1
2 Omeprazole Capsules 40 mg	Take ONE capsule by mouth once a day for 14 days	2 L @ 10 A @ 2ml of 1
3 Multi-Vitamin / Mineral Tablets	Tablet Take ONE tablet by mouth at bedtime for 30 days	2 L @ 10 A @ 2ml of 1
4 Metoclopramide (HCl) Syrup 5/5 mg/ml	Take 2 mL by mouth three times a day for 10 days	2 L @ 10 A @ 2ml of 1
5 Topiride Tablets 50 mg	Take 10 mg tablet by mouth two times a day for 10 days	2 L @ 10 A @ 2ml of 10mg
6 Meropenem Injection 1 g	Inject 2 g by mouth three times a day for 5 days	2 L @ 10 A @ 2ml of 20g

**Instructions:**

ATTEST

(14)



# Institute of Kidney Diseases Peshawar

Phase 12 Hayat Road Peshawar  
Phone: 091 2337261 2

## Patient Discharge Summary Report

MR No: 94050623-3  
Patient Name: Abdul Rehman  
Age / Gender: 50 / Years / Male  
Admitted To: TRANSPLANT ICU - BED NO: 01

Admission Date: 07 AUG-23 09:42:33  
Discharge Date: 16/8/2023  
Department: Urology  
Team Name: Transplant

Procedure: living related renal transplant  
Date: 09-AUG-23 Anesthesia Type: GA  
After CAC and done RT GIBSON INCISION GIVEN, SUBCUTANEOUS TISSUE SEPARATED, MUSCLES SEPARATED, PERITONEUM PUSHED INTO RUOK EPIGASTRIC LIGATED AND CUT. EXTERNAL ILLAC ARTERY DISSECTED OF LYMPHATICS EXTERNAL ILLAC VEIN IDENTIFIED ANASTOMOSIS DONE OF RENAL VEIN AND ARTERY WITH EXTERNAL ILLAC VEIN AND ARTERY RESPECTIVELY BY STENT PASSURE ILLAC ANASTOMOSE (WITH ILLAC DRAIN PLACED). WOUND CLOSED IN REVERSE  
and inferior epigastric artery, atherosclerotic external iliac artery

[ DGIF  
act = 3.2 ]  
16/8/23

Discharge Plan  
in mebonem 500mg 1+1  
Discharge Type  
Tab. Septran DS  
Tab. Tacosen 2mg 8am / 8pm  
Tab. Scymnum 750mg 9am / 9pm  
Tab. Deltacortel 30mg  
Tab. C Tx 450mg  
Cap. Cimeprazole 40mg  
Tab. Digestin Extra  
Tab. Folic acid 5mg  
Tab. Ascaul 70mg  
Tab. Actalat 30mg  
Lij. Lantus 10 Units at Bed rest  
Lij. Humilin R 10 U  
Tab. CaC 1000 plus

Discharge Doctor: Dr. Muhammad Zubair  
Counter Sign: [Signature]  
Discharge Type: [Signature]

**ATTESTED**

Discharge on 16/8/23  
Counter Sign: [Signature]

Nilsht on 16/8/23

Discharge Doctor: Dr. Muhammad Zubair  
Counter Sign: [Signature]  
Discharge Type: [Signature]