

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABAD**

Service Appeal No: 1902 /2024

Mst NAZIA BIBI.....Appellant

**VERSUS**


1. Director E&SED, KPK, Peshawar.
2. District Education Officer (Female) E&SED, Abbottabad.

.....Respondents

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Dated: 4 /11/2024

  
District Education Officer (F)  
Abbottabad

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Dated: 4 /11/2024

  
District Education Officer (F)  
Abbottabad

①

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.....Respondents

PARAWISE COMMENTS ON BEHALF THE RESPONDENTS NO. 1 & 2.

Respectfully Sheweth:

The respondents submitted as under.

**PRELIMINARY OBJECTION**

1. That the appellant has got no cause of action/locus standi to file instant appeal.
2. That the appellant is not an aggrieved person within the meaning of Section 4 of Khyber Pakhtunkhwa Service Tribunal Act 1974, read with Article 212 of the constitution of Islamic Republic of Pakistan 1973.
3. That the appellant has concealed material facts from the ambit of this Honorable Tribunal.
4. That the appellant has not come to this Honorable Tribunal with clean hands as she is as SPET in BPS-16 & seeking her posting in violation of the Rules in vogue.
5. That the appeal in hand is barred by the relevant provisions of law and limitation Act 1908.
6. That the appeal in hands is bed for mis-joinder of the necessary parties.
7. That the Notification No. 4645-48/EB-VI, dated 29-06-2024, of the Respondent No. 2 whereby, the appellant has been posted as SPET in GGHS No.2 Abbottabad under Section 10 of Civil Servants Act, 1973, hence is legal & liable to be maintained.
8. That the aggrieved form Notification No. 4645-48/EB-VI, dated 29-06-2024, the appellant has filed a Departmental Appeal dated 09-07-2024, to the respondent No. 1 which was seen and filed on the grounds of being illegal & even violation of Law & Rules.
9. That the transfer & Posting of the appellant is the competency & Jurisdiction of the competent authority under Section-10 of Civil Servants Act, 1973. Whereunder, the appellant is liable to serve the Respondent Department anywhere, where ever, her service against the SPET is required on the ground of being a post of District cadre.

**FACTUAL OBJECTIONS**

1. **That the Para** No. 01, of the service appeals pertains to service record of appellant. Hence no comments.
2. **That the Para** No. 02, of the service appeals is subject to prove. Hence no comments.
3. **That the Para** No. 03, of the service appeals as is correct. Hence, no comments.
4. **That the Para** 4 of the service appeals is correct to the extent, that the appellant has been adjusted from Government Girls Middle School Kunj Abbottabad to Government Girls High School Kunj, and remain at GGHS Kunj from 2011 to 2018, she herself admitted in this Para.
5. **That the Para** No. 05, of the service appeals is correct to the extent that appellant transferred from Govt: Girls High School Kunj Abbottabad to Govt: Girls High School No. 2 Abbottabad, on 29-3-2018, after 7 years.  
**(Photocopy report of Prinicapl of GGHS No. 2 Abbottabad is annexed as Annexure "A")**.
6. **That the Para** No. 06 of the service appeals is composed is incorrect and denied. It is submitted that Notification No. 4645-48/EB-VI, dated 29-06-2024, to the extent of Serial No. 1 is purely on medical and humanitarians basis and respondent No. 3 struck with serious deased of cancer and was laying treatment so, that high ups consider her case on the basis of humanitarians grounds. That the transfer was issued in morning time while the ban was imposed on evening. Therefore this order was not withdrawn, if otherwise exception is always lay in the law of land and beneficial for the human being. **(Photocopy medical reports are annexed as Annexure "B")**.
7. **That the Para** No. 07 of the service appeals as composed is incorrect hence, denied. The transfer order is only adjustment with in the yard of 200 meters, and subject to approval of high-up on the basis of humanitarians ground. Therefore the departmental appeal of the appellant does not fall in merit.

8. **That the Para** No. 08 of the service appeals as composed is incorrect hence, denied. All transfer order was withdrawn in the light of ban notification dated 29-06-2024, which were passed on merits or otherwise, but the transfer order of the respondent No. 3 does not withdraw due to approval of high up on the basis of medical and humanitarians grounds, is subject to fall within the ambit of exceptions.
9. **That the Para** No. 08 of the service appeals as composed is incorrect hence, denied. the act of the Department with regard to the order dated 29-06-2024, is legally competent as the appellant is not an aggrieved person with the meaning of Section 4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article 212 of the constitution of Islamic republic of Pakistan 1973.


### GROUNDS


- a) **Incorrect & not admitted** the appellant has been treated as per Law & Rules by the Respondent Department vide order Notification No. 4645-48/EB-VI, dated 29-06-2024, in the title appeal, hence, the claim of the appellant is illegal,
- b) **Incorrect & not admitted**. The stand of the appellant is against the facts & legal proposition as she is originally serving in the Department as SPET in BPS-16 & has correctly posted as SPET at GGHS Kunj Abbottabad under above cited rules and Policy by the Department.
- c) **Incorrect & not admitted**. That the appellant has been treated as per Law vide order dated 29-06-2024, by the Department.
- d) **Incorrect & not admitted**. That the order dated 29-06-2024 is legal & even in accordance with the provision of Article-25 of the constitution of 1973, hence liable to be maintained.
- e) **Incorrect & not admitted**. That the stand of the appellant is illegal as the act of the Department with regard to the order dated 29-06-2024, is legally

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competent as the appellant is not an aggrieved person with the meaning of Section 4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article 212 of the constitution of Islamic republic of Pakistan 1973 However, the Respondents also seek leave to this learned Bench to submit additional grounds record & case law at the time on date of hearing.

*It is therefore, humbly prayed that under the circumstances and forging comments, the instant Service Appeals may graciously be dismissed throughout with cost.*

  
SAMINA ALTAF  
DIRECTRESS (E&SE)  
KPK PESHAWAR  
(RESPONDENT NO: 1)

  
Mst. AYESHA SAEED  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD  
(RESPONDENT NO: 2)

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VERSUS

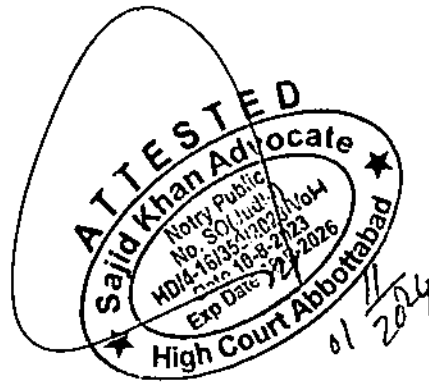
1. Director E&SED, KPK, Peshawar.
2. District Education Officer (Female) E&SED, Abbottabad.

.....Respondents

**AFFIDAVIT**

I, Mst Ayesha Saeed District Education Officer (Female) Abbottabad stated on oath that the contents of Para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

DEPONENT



*Sir, Respondent have neighter  
been <sup>Placed</sup> responsible nor our defome  
Struck off and also not cost  
imposed.*

*Thir  
LO DEO (F) AID  
24/10/24*

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.....Respondents

**REPLY OF SUSPENSION ON BEHALF OF RESPONDENT NO. 1 & 2.**

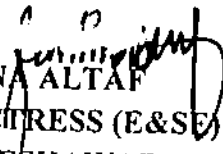
Respectfully Sheweth,

1. That the Para 1 of the Application is relates to record. hence no comments,
2. That Para 2 of the Application as composed is correct to the extent of transfer order. Which is due course of law. Which is purely fall on the basis of medical and humanitarian's grounds & fall in the ambit of exceptions.
3. That the Para 3 of the Application as composed is incorrect, hence denied. The transfer order is based subject to adjustment with in the same vicinity and on medical and humanitarians grounds & issue in accordance with law
4. That the Para 4 of the Application as composed is incorrect, hence denied. Prevailing circumstances under the law does not favor the appellant.
5. That the Para 6 of the Application as composed is incorrect, hence denied. The plea of the appellant for operation the suspension of order is incorrect and against the Peshawar High Court circular dated 05-01-2013 and circular passed by the Chief Secretary dated 5-01-2018, under order 39 CPC red with section 56 of specific relief act 1877 liable to dismissed. (Photocopy of letter are annexed as Annexure "C").



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***It is therefore, humbly prayed that in the light of reply/comments, instant Application may graciously be dismissed throughout with cost.***

  
SAMINA ALTAF  
DIRECTRESS (E&SE)  
KPK PESHAWAR  
(RESPONDENT NO: 1)

  
Mst. AYESHA SAEED

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD  
(RESPONDENT NO: 2)

8

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.....Respondents

**AFFIDAVIT**

I, Mst Ayesha Saeed District Education Officer (Female) Abbottabad stated on oath that the contents of Para wise reply of application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

  
DEPONENT



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Annex "A"

**OFFICE OF THE PRINCIPAL GGHS NO.02**  
**ABBOTTABAD**

S#	Name & Desig:	D.O Birth	D/O 1ST Appointment	D/O Taking over Charge on Present School	D/O Transfer
1	Mst: Nazia Anjad SPET BPS-16	26-01-1968	11-06-1994	29-03-2018	29/06/2024

*[Signature]*  
Principal  
Govl. Girls High School No. 2  
PRINCIPAL, Abbottabad  
GGHS NO.02 ATD

*Attested*  
*[Signature]*  
4/11/24

10 3646547

FFH/FRM/067

Annual

# Fauji Foundation Hospital RAWALPINDI

P.O. BOX - 145  
JHELUM ROAD  
RAWALPINDI  
Tel No. 5788150-65

" B "

Prescription Slip No : \_\_\_\_\_

Date 22/11/24

### REFERRAL PROFORMA FOR SPECIALIST OPINION/CONSULTATION

VALID FOR ONE VISIT ONLY  
(NOT FOR ADMISSION/TREATMENT)

To: Radiology Dept

Dear Sir,

Patient Name Zahida-bibi age 59 years, sex F  
W/O, S/O, D/O Ex No A7353274 Rank How Name Muhammad Haroon

Home Address : Village: \_\_\_\_\_ Post Office : \_\_\_\_\_

Tehsil : \_\_\_\_\_ District : \_\_\_\_\_

PTCL Phone No : \_\_\_\_\_ Mobile Phone No: \_\_\_\_\_

is being referred to you for favour of C/L Mammography

#### Brief History & Investigations

one of ① ended Cx Breast on Flap - Annual  
Mammography of ② side done in MAY 2024

Kindly send the bill along with this authority letter (in original) to the undersigned for payment.

Thanking you

Yours Sincerely,

Signature and stamp of requesting specialist

*Dr. Faris Samad*  
Specialist  
FFH

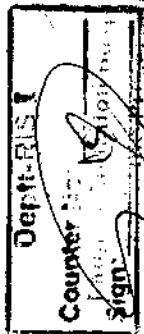
Medical superintendent

*Allocated*  
*4/11/24*

#### SPECIALIST'S OPINION

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Specialist's Signature



ATTACHED  
11/24  
668L

PLATE# 3646547

Kindly update Manning info

Dr. Raja Manjiv  
Resident, Oncology  
FPH Ramgarh  
refer

Ref to ENT

2 x 1 visit  
done on 2/10

11

Patient Name: \_\_\_\_\_  
 Relation: \_\_\_\_\_  
 Patient Type: \_\_\_\_\_  
 Father/Incharge: \_\_\_\_\_  
 Visit Date: \_\_\_\_\_  
 Comments: \_\_\_\_\_  
 Disease: \_\_\_\_\_  
 Next Date: \_\_\_\_\_  
 Contribution: \_\_\_\_\_  
 Remarks: \_\_\_\_\_  
 Discharge: \_\_\_\_\_  
 Date: \_\_\_\_\_

Date: \_\_\_\_\_  
 Message: \_\_\_\_\_  
 Days: \_\_\_\_\_  
 Time: \_\_\_\_\_  
 Location: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Name: \_\_\_\_\_

✓  
Manno - dr

Dr. ...  
Medical Officer  
FFH Rawalpindi

...



668

(Signature)

12

FFH/FRM/053

# Fauji Foundation Hospital Rawalpindi

5788150-65

## DISCHARGE CERTIFICATE

A & D No. 45189D

CONSULTANT  
DR. Sami Ullah

A7353274-1

Regt No. \_\_\_\_\_ Rank WAV Name of Patient ZAHIDA BIBI  
S/O, D/O, W/O HARUN Regt/Corps \_\_\_\_\_ Ward FS

DATE OF ADMISSION: 9.3.22 DATE OF DISCHARGE: 11/3/22

DIAGNOSIS: DCA Breast lump (left side) phyllodes tumor

OPERATION (IF ANY): MRM LEFT Breast

OUT COME: patient is stable and mobile

PERFORMED BY: Baqi Abbas Zaidi DATE OF OPERATION: 11 March 2022

INVESTIGATIONS:  
KFT: - Normal LFT: - Normal  
Coagulation profile normal. Hepatitis serology

TREATMENT & ADVICE:  
Tab: Voltadol 50mg BD  
Tab Riser 40mg OD  
Surgical Gaze  
Benjaye

FOLLOW UP: 4/11/29

~~Get chest + abdomen~~ Zahida bibi 47 years age female  
presented to surgical opd with swelling of Lt.  
Breast. subsequently patient was admitted to  
APPROVED F&L and mammography revealed:  
(1) Solid & cystic mass (BIRADS) IV  
(2) well defined density in UoB  
CT abdomen and pelvis: Large heterogeneity

Dr. Faheem Ullah  
Medical Officer  
FFH Rawalpindi

Attested  
4/11/29

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# FAUJI FOUNDATION HOSPITAL

TRUST CREATED UNDER THE CHARITABLE ENDOWMENTS ACT 1890  
FOR THE BENEFIT OF EX-SERVICEMEN AND THEIR FAMILIES



P.O Box No. 145  
Jhelum Road  
Rawalpindi  
Ph: 051-5788150 - 165  
Date: 8 Apr 22

Ref No: 6207/NORI/Med/205

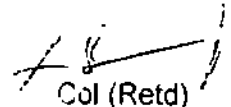
To: Nuclear medicine, Oncology and Radiotherapy Institute (NORI)  
G-8/3, Islamabad

Subject: Medical Treatment - Patient Zahida Bibi W/O Ex-7353274 - Hav Muhammad Haroon (Retd)

1. Patient Zahida Bibi age 47 years Wife of Ex-7353274 Hav Muhammad Haroon (Retd), a case of **Breast Phylodes Tumor** is being referred to your hospital for **Adj (EBRT)** as advised by Dr Fauzia Abdus Samad, Prof of Oncology Fauji Foundation Hospital Rawalpindi.

2. Necessary hospital bill will be paid by this hospital upto Rs 50,000/- (Rupees fifty thousand only). If treatment of the patient is to be continued and additional amount is required, please ask the patient in writing to bring new treatment letter demand by treating doctor.

3. This letter is valid upto 07 Oct 2022. This hospital will not be responsible for payment of treatment bill if the patient is entertained after 07 Oct 2022. Please send his treatment letter (in original) to this hospital alongwith med treatment bill for payment.

  
Col (Retd)  
For Commandant  
Dr Muhammad Tariq Chaudhry

*Attested*  
*4/11/22*



14



MISS ZAHIDA		AGE:	YEARS:	GENDER:	F
VI: USG (LF) Breast	ID NO:	2431	DATE:	19-Jan-2022	

ULTRASOUND: LEFT BREAST

- A large heterogeneous lesion with internal cystic areas is noted in the left breast, occupying almost all the outer half of the breast, replacing the breast parenchyma and causing stretching of overlying skin. The lesion is hard on probe pressure, forming a bulge on breast and causing obvious deformity with maximum measurable AP diameter of 7.9cm from skin. It lies in the subcutaneous tissue, anteriorly and abutting pectoralis major muscle, posteriorly. However, no nipple retraction is seen. Central areas of vascularity are also appreciated within the lesion on Colour Doppler. Few anechoic cystic structures in linear configuration are also seen at places tapering towards nipple, likely representing dilated ducts. One of them measuring 10.9mm at 3 o'clock position.
- Compressed breast parenchyma appears echogenic---secondary to mass effect.
- Few sub-cm axillary lymph nodes are noted with preserved fatty hilum---reactive lymphadenopathy.

IMPRESSION:

- Large, heterogeneous lesion with internal vascularity ---outer quadrant left breast causing bulging deformity --- (BIRAD-IV)---?Phyllodes tumor (with malignant transformation)

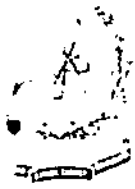
Biopsy and histopathology is advised



at

35  
Imaging (USG)  
Department of Radiology & Nuclear Medicine

Atul Steel  
11/24



# Atomic Energy Cancer Hospital - INOK

Mansehra Road Abbottabad

Phone: 0992-9311029, 9311030, 9311031 Fax: 0992-9311023 Email: inor@paec.gov.pk

PRN:	400954/22	File No.	Nm/40/22
Patient Name:	Zahida Bibi	Status:	Non Entitled
W/O	Muhammad Haroon	Entry Date:	17 Feb-2022
Age:	11 Y	Contact Nos:	0345-9566644
Gender:	Female	City:	Mansehra

## BILATERAL MAMMOGRAPHY [BIRADS-V]

**Clinical Features**  
Lump Left Breast.

**Procedure**  
Procedure was done in Craniocaudal & Medio-lateral Oblique views and shows:

**Findings**

Left Breast:

Skin thickness is increased with nipple in profile.  
**Large density involving almost entire breast, corresponding to a large complex ill defined irregular hypoechoic solid cum cystic mass measured approximately 76 x 115 106mm. (AP x TR x CC) involving predominantly outer half. Mild flow is noted on colour doppler.**  
 Architectural distortion seen.  
 Few axillary lymph nodes are seen. (With intact hilum on correlative ultrasound largest one is measured 11 x 10mm)

Right Breast:

Skin and subcutaneous thickness normal with nipple in profile. Parenchyma shows mixed micro-glandular pattern.  
**A well defined density with lobulated margins and dense calcifications in UOQ.**  
 No micro-calcification seen.  
 No architectural distortion seen.  
 Few axillary lymph nodes are seen.

**Opinion**

Large density left breast with parenchymal distortion and axillary lymphadenopathy - **BIRADS-V. Biopsy is advised.**  
 Well defined density UOQ of right breast - Degenerating fibroadenoma? **BIRADS-III. (FNAC is advised)**

**Advance**

Biopsy is advised.

**Conclusion:**

Dr. Ridda Batool  
Reporting Doctor

*Handwritten signature*  
 4/11/24

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**INOR**  
ABBOTTABAD  
Prescription Slip

Phones  
0992 9311029  
0992 9311030  
0922 9311031

PRN No: \_\_\_\_\_ Date: \_\_\_\_\_

Patient's Name: \_\_\_\_\_ S/o. W/o. D/o \_\_\_\_\_

Disease: Mulleroides Tumor

Clinical Record

3 Phlythides

Rx  
= 1000 mg  
1000 mg  
1000 mg  
1000 mg  
1000 mg

Accepted  
4/11/24



**OPD Prescription form**

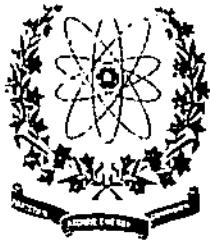
Room No :  
 Department : **SURGICAL-C**  
 Date : **08-MAR-22 09:48:20**  
 Dept Fee : 30  
 User : **HAMMAD SHAFIQUE**  
 MRNO : **K0400002873299**  
 Invoice No : **K04220570148**  
 Sex : **Female**

Name : **Zahida Bibi**  
 Father Name :  
 Husband Name : **MUHAMMAD HAROON**  
 Age : **47 Year(s) 00 Month(s) 0 Day(s)**  
 Patient Type : **REGULAR**

**Investigation**

*(Handwritten notes in Urdu):*  
 Patient is having **breast** lump. She is **already** **admitted** in **hospital** and **waiting** for **admission**.  
 She is **entitled** for **free** **bed** **and** **food** **and** **medicines**.  
 She is **admitted** in **hospital** and **waiting** for **admission**.  
 She is **entitled** for **free** **bed** **and** **food** **and** **medicines**.  
 She is **admitted** in **hospital** and **waiting** for **admission**.  
 She is **entitled** for **free** **bed** **and** **food** **and** **medicines**.

*(Handwritten signatures and dates):*  
 Attested  
 4/11/24  
 2/11/22  
 2/11/22



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**INOR**  
ABBOTTABAD  
**Prescription Slip**

Phone:  
0992-9311032

PRN No 02089/22

Date 09/06/2022

Patient's Name Zahida S/o, W/o, D/o \_\_\_\_\_

Disease Phyllodes tumor Left Breast

**Clinical Record**

**Rx**

TO WHOM IT MAY CONCERN

Zahida Bibi w/o Muhammad

Haron is a diagnosed case of  
Phyllodes tumor Left Breast.

She underwent Left MRM and is now  
planned for adjuvant RT and CMF.

She is advised bed rest till 26 June 2022

SMD INOR  
Abtd.

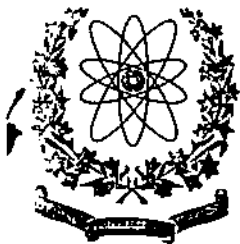
*Accepted*

Docetaxel AHP 20mg & 80mg Inj.  
Oxaliplatin AHP 50mg & 100mg Inj.

Paclitaxel AHP 30mg & 300mg Inj.  
Fludarabine AHP 50mg Inj.

Scimax 300mcg Inj.  
Zoledronic Acid AHP 4mg Inj.

4/12/24



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# INOR

## ABBOTTABAD

### Prescription Slip

Phone:

0992-9311032

PRN No 002089/22

Date 9/5/22

Patient's Name Zahida S/o, W/o, D/o \_\_\_\_\_

Disease Phylloides Tumor

#### Clinical Record

Rx

TO WHOM IT MAY CONCERN

Zahida Bibi w/o Muhammad Haroon is a diagnosed case of Phylloides Tumor left breast. She underwent left mastectomy and is now planned for adjuvant therapy at INOR. She is advised complete bed rest for 1 month.

9/5/22 to 9/6/22

DR. MUSAB RIAZ

Director

9/5/22

Docetaxel AHP 20mg & 80mg Inj. or Paclitaxel AHP 30mg & 300mg Inj.  
 Oxaliplatin AHP 50mg & 100mg Inj. or Fluorouracil AHP 50mg Inj.

Scimax 300mcg Inj.  
 Zoledronic Acid AHP 4mg Inj.

All set  
 4/11/22

4/11/24  
 Attkin

COMPUTER GENERATED REPORT, NO SIGNATURE REQUIRED

Enlarged bilateral sac & inguinal lymph nodes, largest left external iliac measuring 2.1 x 2.9 cm  
 SMA, SMV & its branches with preserved luminal opacification of all the enclosed vessels  
 Conglomerate mesenteric lymph nodes are seen, measuring 0.6 x 10.5 x 10.8 cm. The mass is encasing  
 patency with bilateral mild hydrourethrosis  
 Proximal & mid ureters are also encased by the lymphoid mass with luminal narrowing, preserved  
 & portal vein & bilateral renal arteries with preserved luminal opacification of all the enclosed vessels  
 pancreas anteriorly, kidneys posteriorly, encasing aorta, celiac trunk & its branches, SMA, splenic  
 Conglomerate paraortic lymph nodes are seen, approx measuring 0.5 x 17.7 x 14.6 cm, encasing  
 prominent discrete bilateral axillary lymph nodes are seen, largest left axillary measuring 1.4 cm  
 CTR # 1227  
 Right sided moderate pleural effusion is noted  
 No chest wall or pleural mass is detected  
 at AP window measures 2.8 x 2.7 cm  
 Conglomerate paratracheal, aortopulmonary & carinal mediastinal lymph nodes are seen, largest  
 Consolidation collapse with minimal air bronchogram is noted in right middle lobe  
 REPORT

CT CHEST WITH CONTRAST  
 TECHNIQUE  
 CT CHEST ABDOMEN & PELVIS

CT Scan Report  
 Department of Radiology  
 15 Aug 2023 11:54:11  
 0000000144078  
 23-0087001  
 MALAYALAM HAD HAD ROOM  
 51 100031000  
 13003 1012001

Department of Radiology

15 Aug 2023 11:54:11

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ARMED FORCES BONE MARROW TRANSPLANT CENTRE



RAWALPINDI PAKISTAN

Ph: +9251-9270076 Fax: +9251-9271860 email: [afbmtcpk@yahoo.com](mailto:afbmtcpk@yahoo.com)

CASE SUMMARY

No: 10961 Name: P Hav Muhammad Haroon	
Age: 51yrs Wt: 60.5 kg Ht: 167cm BSA: 1.68 m <sup>2</sup>	
Date of Admission: 21/08/2023	Date of Discharge: 12/09/2023
Diagnosis: CLL Binet-B	
Status: Post 2 x R-Benda,	
Post 4 x IFRT,	
On Ibrutinib since 10 Oct 2023	
Contact: 0345-9566644	
Address: House 65/68, Street 2, Officer Colony, PMA Road, Abbotabad	

**Brief History:**

Hav Haroon is 51 years old male born to non consanguineous parents, having 9 siblings, with no previous comorbid, presented 1 month ago to a CMH Lahore with complaints of shortness of breath, weight loss(8kg in 2 months) fatigue and fever. On examination he had generalized lymphadenopathy and abdominal mass (15x20cm). His CP (10/08/2023) showed leucocytosis (TLC: 155.3 with 85 % lymphocytes, Hb: 14.3, Plt: 115). U/S abdomen showed large abdominal mass measuring 6.4x12.8x12.9cm, splenomegaly, abdominal lymphadenopathy and right sided pleural effusion. His CECT chest, abdomen and pelvis (11/08/2023) showed mediastinal, axillary, inguinal, abdominal lymphadenopathy, splenomegaly, collapse consolidation right middle lobe and right sided pleural effusion. His BME and Flow cytometry done on 15/08/2023 were consistent with B-CLL (Flow cytometry: 81% of gated population is CD45 (99%), CD19+CD5 (83%), CD20+CD23 (42%), wCD22 (90%), CD20 (50%), CD7 (04%), CD5 (05%), CD3 (02%)). He was referred to AFBMTC for further management.

His FISH for CLL panel (26/08/2023) was negative His HRCT chest (21/08/2023) showed discrete and conglomerate mediastinal lymphoid mass, moderate pleural effusion on right with mild pleural effusion on left. Ultrasound guided abdominal mass biopsy (24/08/2023) showed small lymphocytic lymphoma. His PET CT (25/08/2023) was done which was suggestive of Biopsy proven B-CLL with marrow infiltration, pleural effusions, nodal disease above and below diaphragm, forming below diaphragm bulky nodal conglomerates His Bone marrow slides were reviewed at AFBMTC on 24/08/2023 and opinion of CLL was given. Pleural Fluid Smears (01/09/2023) were hypercellular compromising predominantly of lymphocytes in an amorphous background (CD3 +ve, CD20 +ve, CD5 -ve in B cells) and Pleural fluid cytology was negative. Pleural fluid ZN staining, gene xpert for MTB was negative and ADA level was normal.

**Treatment at AFBMTC**

He was given follow therapies for his CLL active disease, which he tolerate well.

1. Cycles# 1 of R-Benda from 06/09/2023 to 08/09/2023.
2. Cycle#2 of R-Benda from 29/09/2023 to 01/10/2023
3. 4 cycles of IFRT from 5/10/2023 to 10/10/2023
4. 4) Tab Ibrutinib 140mg 3x OD started from 10/10/202

*Handwritten signature:* All the best  
 7/11/24



**Problems during admission:**

**1) Bilateral Chylous Pleural Effusion:**

Hav Haroon had initially right sided pleural effusion and he had shortness of breath at rest, multiple therapeutic taps were done, but effusion gradually increased in size. Thoracic Surgery department was taken in liaison and chest tube was placed on 15/09/2023 that showed output till 21/10/2023. He then developed left sided pleural on 02/10/2023 and left sided chest tube was placed on 04/10/2023. The fluid in both the drains were chylous. Chest tubes in right and left side were removed after no output on 22/10/2023 and 08/11/2023 respectively. He was given prophylactic anticoagulation with Inj Clexane 40mg subcutaneously once daily for his decreased mobility and is stopped on discharge

**Investigations:**


WBC:  $7.37 \times 10^9/L$  ANC:  $2.21 \times 10^9/L$  Hb: 7.9 g/dL Plts:  $418 \times 10^9/L$   
Bilirubin: 03  $\mu\text{mol/l}$  ALP: 107 u/l ALT 14 u/l  
Na: 137 mmol/l K: 4.1 mmol/l Urea: 2.5 mmol/l Creat: 48  $\mu\text{mol/l}$   
CRP: 37 mg/l LDH: 134 u/l

**Treatment and Medicines:**


1. Tab Ibrutinib 140mg	3+0+0	Daily
2. Cap Risek 20mg	1+0+0	30mins before breakfast
3. Tab Acylex 400mg	1+0+1	Daily
4. Tab Septran 480mg	(1+0+1)	On Sat and Sunday only
5. Cap Fluderm 150mg	(1+0+1)	Daily
6. Tab Tonoflex P	(1+0+1)	Daily
7. Tab Motillium 10mg	1+1+1	As per need

**Follow up Notes:**

1. Follow up at AFBMTC OPD after 2 weeks on Thursday 23/11/23 (Blood CP on 23/11/23)
2. Report immediately to AFBMTC day care in case of fever, vomiting or any other complaint

  
Dr. Ghulam Hussain  
FCPS (H) Hematology  
Registrar Clinical Hematology  
AFBMTC Rawalpindi

*Dr. Nighat Shahbaz*  
Classified Hematologist & BMT Specialist  
AFBMTC Rawalpindi

  
Dr. Insa Hidayat  
Registrar Clinical Hematology  
AFBMTC Rawalpindi

*Dr. Insa Hidayat*  
Registrar Clinical Hematology  
AFBMTC Rawalpindi

Dated 10 November, 2023

32

CONFID

In Lieu of  
PAFM-1316

# CMH RAWALPINDI

## MED CASE SHEET

A & D SERIAL NO. \_\_\_\_\_

NO. \_\_\_\_\_ RANK PI Haw NAME Haroon | 7353274 UNIT \_\_\_\_\_

DISEASE \_\_\_\_\_

Date and Time

THORACIC SURGERY R/W

06 Dec 2023

11:00 am

Δ Chh

SIB Brig. Farhan Ahmed Majed.

Under treatment of AF BMTC.

Referred by military pulmonologist for  
opinion on thoracic duct ligation

H/o - B/L chylous pleural effusion  
Managed with B/L chest tube

C/O: B/L pleural effusion

C/R: vitally stable  
NO difficulty in eating  
B/L absent meconium stool on basis

USE: B/L pleural effusion (contradiction b/w quantification  
by two different radiologists)

Adv - CECT chest

○ Follow up with films of ~~REC~~ CECT chest.



Attested  
4/11/24



- ① No immediate intervention needed at the moment
- ② Observe patient and follow up after 2 weeks with fresh X-ray chest
- ③ Zinnuss treatment as per advice of primary treating physician

Dr.

Dr. Chait Chest seen

Choking - Improved  
NO active complications

ATC: B11, steroid of fusion

KIC - 3-CLL

SIB: CS1, Komren

Dr. Chait

1030m

11 Dec 2023

4/11/24  
Attended

RECEIVED  
MAY 10 1974

RECEIVED  
MAY 10 1974

I am directed to convey the concern of competent authority that the learned judicial officers of Khyber Pakhtunkhwa usually ignore the spirit of law contained in order 39 of the Rules of the High Court of Khyber Pakhtunkhwa. The learned judicial officers are provided with obligations of law and temporary injunctions. The learned judicial officers are bound to ensure compliance of conditions mentioned in aforesaid provisions of laws/rules before grant of status quo orders/temporary injunctions. Any lapse on their part in this respect will be considered breach of law and professional misconduct in future. Various instructions on the subject have already been communicated to all from time to time, but in future action should be taken against violating the instruction.

Subject: **VIOLATION AGAINST GOVERNMENT**  
To all judicial in their districts.  
Khyber Pakhtunkhwa to be circulated  
All the districts & Sessions Judges  
Peshawar High Court  
Peshawar

Stamp: **RECEIVED**  
MAY 10 1974  
MAY 10 1974  
MAY 10 1974

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Amul

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23

Better copy

THE  
PESHAWAR HIGH COURT  
PESHAWAR

310/Admn

dated Peshawar the 05/01/2018

From

**Registrar**

**Peshawar High Court**

**Peshawar.**

To All the District and Session Judges  
Khyber Pakhtunkhwa to be circulated  
To all judicial in their Districts.

Subject: INJUNCTION AGAINST GOVERNMENT

Dear Sir,

I am directed to convey the concern of competent authority that the learned Judicial Officers or Khyber Pakhtunkhwa usually ignore the spirit of law contain in Rule 1 to 3 order 39 CPC read with section 56 of specific relief Act 1877 while granting status quo orders/temporary injunctions, the learned Judicial officers are reminded of obligations of law while disposing please for status quo orders/temporary injunctions.

The learned Judicial Officers are bound to ensure compliance of conditions mentioned in for said provision of laws/rules before the grant of status quo orders/temporary injunctions. Any laps on their part in this respect will be considered breach of law and professional misconduct in future. Various instructions on the subject has already been communicated to all from time to time, but in future action shall be taken against violating the instructions.

Muhammad Saleem Khan  
PAS

Registrar.

Even No dated  
Copy forwarded for information to.

*Att. to ch*

Muhammad Saleem Khan

*Att. to ch*  
4/11/24

24



The PESHAWAR HIGH COURT  
Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and written by officials by name.  
Tel: 921014088  
Off: 9210138  
Fax: 9210130

No. 5124-13

Dated 17.03.14

From,  
The Registrar,  
Peshawar High Court,  
Peshawar.

To,  
All the District & Sessions Judges / Zilla Qazis,  
in NWFP.

SUBJECT: INTERIM INJUNCTION / STATUS QUO

Sir,  
I am directed to refer to this Court directives C.No. 4(1-B), 7(1-B), 8(1-B) and 9(1-B) of Judicial listacode at pages No. 353, 354, 355 & 356 and to say that the courts are expected to follow the said directives in letter and spirit while dealing with applications for temporary injunctions, especially in the matter involving public revenue, public developmental schemes etc. This directive may be circulated amongst all the judicial officers under your control

Yours Faithfully,

o/c

(SYED MUSADIQ HOSSAIN GHANI)  
REGISTRAR

Encls: No. 5784-85/A  
Copy forwarded to:

Dated 17.3.14

1. Secretary, Establishment Department, Government of NWFP with reference to letter No. SOE-III(E&AD)6-3/2010 Resolution No. 365 dated 11.02.2010 and subsequent letter No. SOE-III(E&AD)6-3/2009 dated 01.03.2010.
2. Secretary to Government of NWFP, Law, Parliamentary Affairs and Human Rights Department, Peshawar.

o/c

(SYED MUSADIQ HOSSAIN GHANI)  
REGISTRAR

at Cashed  
District Education  
Peshawar

A Ghani  
4/4/14

25

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THE  
PESHAWAR HIGH COURT  
PESHAWAR

No. 5129/83

dated Peshawar the 17/03/2010

From

Registrar  
Peshawar High Court  
Peshawar.

To All the District and Session Judges/ Zilla Qazis,  
In NWFP.

Subject: INTERM INJUNCTION/STATUS QUO

Sir,

I am directed to refer to this court directives C.No 4(4-8) 7(4-8), 8(4-8), and 9 (4-8) of Judicial Esta Code at page No 353, 354, 355 and 356 and to say that the courts are expected to follow the said directives said letter and spirit while dealing with applications for temporary injunctions, especially in the matter involving in public revenue, Public development scheme etc. This directive may circulate amongst all the judicial officers under your control.

Yours Faithfully,

(SYED MUSADIQ HUSSAIN GILANI)

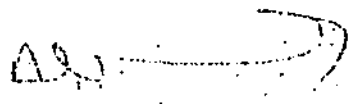
REGISTRAR.

Endst: No 5184-85/Admn

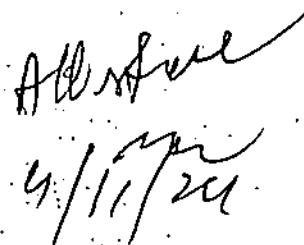
dated 17-03-2010.

Copy forwarded to,

1. Secretary, Establishment Department, Government of NWFP with reference to letter No: SOE-III(E&AD)6-3/2010 Resolution No 365 dated 11-20-2010 and subsequent letter No: SOE-III(E&AD)6-3/2009 dated 1-3-2010.
2. Secretary, Government of NWFP, Law, Parliamentary affairs and Human rights Department, Peshawar.



(SYED MUSADIQ HUSSAIN GILANI)

  
4/11/2010

26

Court Matter /  
Most Immediate

PSO TO CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

No. PSO/CS/KPK/11-26/2018

Dated Peshawar, 5<sup>th</sup> Jan., 2018

To

1. All Administrative Secretaries in Khyber Pakhtunkhwa
2. All Divisional Commissioners in Khyber Pakhtunkhwa
3. All Deputy Commissioners in Khyber Pakhtunkhwa

*Local Govt*

*6315  
911118*

Subject: INJUNCTIONS AGAINST GOVERNMENT

Dear Sir

I am directed to forward herewith a copy of Peshawar High Court letter No. 181 BJA/Admn, dated 05-01-2018 alongwith following letters on the subject cited above:

S. No.	Letter No.	Date	Subject
1	5129-BJA/Admn	17-03-2016	Interim Injunction / Status quo
2	3047-3846/Admn	04-07-2001	Indiscriminate Grant of Injunction and Stay Orders by the Subordinate Courts.
3	10221-10170/Admn	27-10-1999	Interim Injunction/Status quo
4	0898-10077/Admn, D.C.	17-08-1997	Interim Injunction / Status quo

2. Law department should inform all Law Officers and Advocate General's office, accordingly, to quote these instructions in all cases where stays have been Off are being granted. Sundry departments should quote these instructions while defending government cases, involving stays.

Yours faithfully,  
  
(RIZWAZ ALAM)  
PSO to Chief Secretary  
Tel: 091-9210355  
Fax: 091-9210447

*Spoken, Physically to all concerned*

*for all concerned*

*at Enclod*

*for Special Education Officer (Female) Abbottabad*

*Attestd  
4/11/24*



27

BETTER COPY

Court Matter i  
Most Immediate

PSO TO CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

No. PSO /CS/KPK/1-26/2016

Dated Pesh: the 5<sup>th</sup> June, 2018

To

1. All administrative Secretaries  
In Khyber Pakhtunkhwa.
2. All Divisional Commissioners
3. All Deputy Commissioner  
In Khyber Pakhtunkhwa

Subject: INJUNCTIONS AGAINST GOVERNMENT.

Dear Sir,

I am directed to forward herewith a copy of Peshawar High Court letter No. 181-83/Adma, dated 05-01-2018 alongwith following letters on the subject cited above.

S.No	Letter No.	Dated	Subject
1	5129-83/admn	17-10-2010	Interim injunction/status quo
2	3647-3846/admn	04-07-2001	Indiscriminate grant of injections and stay orders by the subordinate courts.
3	10221-10370/admn	27-10-1999	Interim injunction/status quo
4	9898-4997/admn Br	17-6-1997	Interim injunction/status quo

2. Law Department should inform all law officers & advocate General office. Accordingly to quote these instructions in all cases where stays have been OR being granted similarly Department should quote these instructions while defending Government case, involving stays.

Yours Faithfully

(khurshid Alam)  
PSO to Chief Secretary  
Tel: 091-9210355  
Fax: 091-9210447

PS to Chief Secretary Khyber Pakhtunkhwa

*Atty. Gen. of*

*Atty. Gen. of*  
*4/11/2018*



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No 7802 Dated 01/11/2024  
Phone No. 0992-342533-342324

**AUTHORITY LETTER**

Mr Zahid Gul Khan legal representative, office of undersigned is hereby authorised to attend, brief and follow the instant **Service Appeal No. 1902/2024 "Mst Nazia Bibi VS Govt of KPK & Others"**, before the KPK Service Tribunal Peshawar fixed on **22-05-2024** on behalf of the respondents No.1 to 2.

M. 2024  
10/11/2024  
SAMINA ALTAJ  
DIRECTRESS (E&SE)  
KPK PESHAWAR  
(RESPONDENT NO: 1)

  
Mst. AYESHA SAEED

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD  
(RESPONDENT NO: 2)