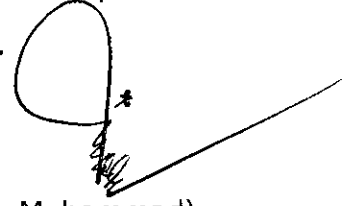


18.05.2022

Learned counsel for the appellant. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Written reply/comments not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 22.07.2022 before S.B.

A handwritten signature in black ink, consisting of a large, rounded loop followed by a vertical line and a diagonal stroke extending to the right.

(Mian Muhammad)  
Member (E)

13.08.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. Subject to all just and legal objections including that of limitation to be determined during the course of full hearing, this appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 16.12.2021 before the D.B.

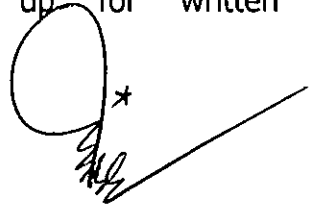
Appellant Deposited  
Security & Process Fee  
22/8/21

  
Chairman

16.12.2021

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for official respondents present.

Written reply/comments not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 02.03.2022 before S.B.



(MIAN MUHAMMAD)  
MEMBER (E)

2-3-2022

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 18-5-2022



  
Reader

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 6605 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/06/2021	<p>The appeal of Mr. Haroon-ur-Rasheed resubmitted today by Malik Zeeshan Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13/08/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Haroon-ur-Rasheed son of Mir Salam Khan r/o Sikandar Khel bala Haibak Malak Shah Bannu received today i.e. on 21.06.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellatant.
- 2- Appeal has not been flagged/marked with annexures' marks.
- 3- Annexures of the appeal may be attested.
- ④ Most of dates mentioned in the memo of appeal are not matching with the dates of attach documents.
- 5- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1061 /S.T,

Dt. 22/06 /2021

  
REGISTRAR  
SERVICE TRIBUNÁL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Malik Zaesham Khan  
Pesh.

Re submitted in the court

  
93/6  
2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

S.A No. 6605 /2021

Haroon ul Rasheed..... Versus..... DG Health etc

INDEX

S. No	Description of Documents	Annexure	Pages
1	Service Appeal with Affidavit		1-5
2	Copy of CNIC	"A"	6
2	copy of show cause notice dated: 12.01.2021	"B"	7-8
3	Copies of OPD slip and Laboratory test	"C & D"	9-10
4	Copy of the impugned order date: 22.01.2021	"E"	11
5	Copies of Departmental Appeal and impugned order dated: 25.03.2021	"F & G"	12-13
6	Copy of Condonation of delay		14-15
7	Wakalat-Nama		16

Dated: 19<sup>th</sup> June. 2021

Plaintiff  
Through

ATTESTED  
Malik Zeeshan Khan  
Advocate High Court  
& Federal Shariat Court  
of Pakistan  
Malik Zeeshan Khan  
Advocate High Court

Real Justice Law Chamber & Legal Consultancy  
Chamber No.22, 2<sup>nd</sup> floor Liberty Mall  
Main University Road Peshawar  
+92-300-5763610  
+92-313-5763610  
[malik.enterjuris.02.16@gmail.com](mailto:malik.enterjuris.02.16@gmail.com)

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

S.A No. \_\_\_\_\_/2021

Haroon ul Rasheed S/O Mir Shimal Khan R/o Sikander Khel Bala  
Haibak Malak Shah Tehsil & District Bannu.

**VERSUS**

- 1) The Director General Health Services Khyber Pakhtukhwa Peshawar.
- 2) The Secretary Khyber Pakhtunkhwa Health Department Peshawar.
- 3) The District Health Officer, District Bannu.
- 4) The Incharge BHU Khalifa Gul Nawaz Bannu.

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT,  
1974 AGAINST THE IMPUGNED OFFICE ORDER  
No. 749-57 DATED: 22.01.2021 WHEREBY  
APPELLANT HAS BEEN REMOVED FROM  
SERVICE ON ACCOUNT OF "COMPULSARY  
RETIREMENT", WHEREBY THE PHYSICAL  
REPRESENTATION AND DEPARTMENTAL  
APPEAL AGAINST THE ABOVE IMPUGNED  
ORDER WAS REJECTED VIDE IMPUGNED  
NOTIFICATION No. 1895/Personel DATED:  
25.03.2021 ISSUED FOR NO LEGAL REASON.

---

Respectfully Sheweth,

- 1) That the appellant is the natural born citizen of Pakistan and is entitled for all the rights guaranteed by the Law.  
*(Copy of CNIC is attached)*
- 2) That the appellant belongs to respectable family and performed his duty very well with good zeal.  
*(Copy of the CNIC is annex as Annexure "A")*
- 3) That on 06.01.2021 the appellant was ill that day and was undergoing treatment at the District Headquarter

Hospital, MTI Bannu vide Out Patient Department Slip No. 995, dated: 06.01.2021 for treatment and tested typhoid positive. The physician directed the appellant bed rest for three (3) days and was unable to perform his duty on 06.01.2021.

- 4) That vide Notification No. 359-65 dated: 12.01.2021 the respondent No. 04 issued in show cause notice wherein the appellant was reported from invisible inquiry that the appellant was found absent on dated: ~~06.01.2021~~ without prior permission of the competent authority.

*(Copy of Show Cause Notice dated: 12.01.2021 as Annexure "B")*

- 5) That the provision of the reasonable opportunity for submission of reply of the above mentioned show cause, the appellant was submitted through within the stipulated time period and mentioned the basic reason that the appellant was ill that day and was undergoing treatment at the District Headquarter Hospital, MTI Bannu vide Out Patient Department Slip No. 995, dated: 06.01.2021 for treatment and tested typhoid positive. The physician directed the appellant bed rest for three (3) days and was unable to perform his duty on 06.01.2021.

*(Copies of OPD slip and Laboratory results are as Annexure "C"& "D")*

- 6) That the respondent No. 4 directly issued impugned Office Order No. 749-57, dated: 22.01.2021 illegally, unjust, unfair, without the law, without the prior permission from the competent authority and the appellant was directed that the reply in response to show cause notice dated: 12.01.2021 submitted by the appellant, which was not accepted being non satisfactory.

*(Copy of the impugned order dated: 22.01.2021 as Annexure "E")*

- 7) That the appellant submitted departmental appeal to the respondent No. 4 for the restoration of the

services of the appellant but the genuine reason and the appeal of the appellant was regretted vide Notification No. 1895/Personel. dated: 25.03.2021, hence this very appeal before this Hon`ble Tribunal.  
*(Copies of the Departmental appeal and impugned order dated: 25.03.2021 are Annexure "F" & "G"*

3

Hence this appeal, inter alia, on the following grounds:-

GROUNDS:

- a) That the appellant is a natural born citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- b) That the acts of the respondents of not following the relevant rules, regulations, office memorandum, notifications and the commitments made by the respondents in respect of compulsory retirement of the appellant from service is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- c) That the issuance of the impugned order was not appreciated in letter and spirit and was misinterpreted by the respondents.
- d) That the rejection of reply of the show cause notice and departmental appeal of the appellant are in total disregard of Law and rules, so are liable to struck down.
- e) That suddenly removing the appellant from such a departmental duty is tantamount to taking the law into one's own hands by the respondents.
- f) That the penalty was imposed by the respondents under the Khyber Pakhtunkhwa efficiency & discipline rules 2011 on the appellant that he remained absent for only One day i.e 6<sup>th</sup> Jan,



2021 with having submitted any application for leave and the reason already mentioned above, the respondent, such punishment by the respondents is without the law and the appellant is entitled to the relief of reinstatement with all back benefits.

- g) That the appellant is not habitual absentee from duty, hence it can be reflected from the impugned show cause notice issued only that the appellant remained absent from his duty on 06.01.2021.
- h) That the appellant submitted through applications and departmental appeal on the grounds that the appellant was suffering from typhoid as per the hospital record for reinstatement, however the respondents observed and the applications as well departmental appeal were regretted.
- i) That the fundamental rights of the appellant has blatantly violated by the respondents and the appellant has been discriminated and has been denied from his due legal rights, hence liable to be declared so.
- j) That any other ground not raise here specifically may graciously be allowed to be raised at the time of arguments.

**PRAYER:**

It is therefore, most humbly prayed that, On acceptance of this Service Appeal an appropriate direction may please be issued declaring that the compulsory retirement from service of appellant is illegally, ab-initio, without the legal criteria, un just, unfair and without the fundamental rights of the appellant. Further the impugned office order No. 749-57, dated:22.01.2021 passed by the respondents may declared illegal and against the natural Justice and the appellant may very kindly be restored from the date of issuance of the said impugned order and accordingly all the back benefits/salaries of the appellant be released.

5

Any other relief, not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated: 19<sup>th</sup> June, 2021

Appellant

Through



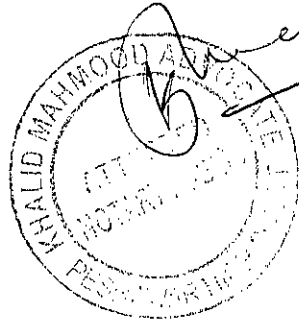
ATTESTED  
Malik Zeeshan Khan  
Advocate High Court  
& Federal Shariat Court  
of Pakistan

Malik Zeeshan Khan

Advocate High Court, Peshawar.

**Affidavit:**

I, Haroon ul Rasheed S/O Mir Shimal Khan R/o Sikander Khel Bala Haibak Malak Shah Tehsil & District Bannu, declared on oath that No such like appeal has earlier been filed further and nothing has been concealed by the appellant before this Hon'ble Tribunal.



Haroon ul Rasheed

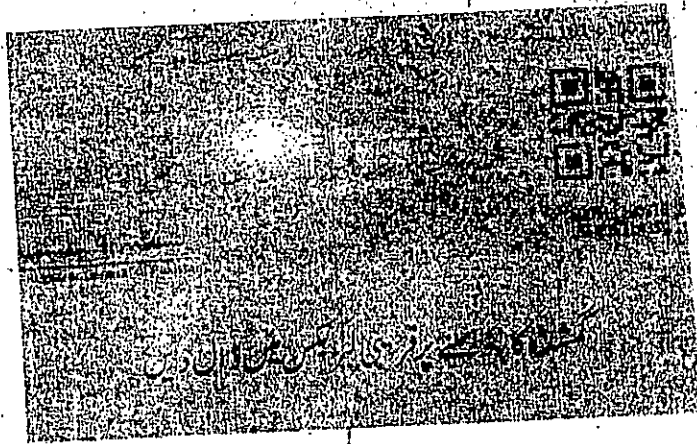
DEPONENT

11101-6190177-7



6

Annex  
F Am





OFFICE OF THE DISTRICT HEALTH OFFICER BANNU  
No 359-65 / Dated Bannu the 12 / 01 / 2021

Annex B  
7

**SHOW CAUSE NOTICE**

In exercise of the Powers conferred under rules 14, (Sub rule 04) of Government of Khyber Pakhtunkhwa efficiency & discipline rules 2011, and subsequent inquiry report received from Dr.Hameed ur Rehman DDHO Bannu and Dr.Sajjid Ayaz Khan PMO Incharge Police Hospital Bannu, you, Mr: Haroon Rashid Chowkidar BHU Khalifa Gul Nawaz Bannu is hereby served a show.Cause notice with the following allegations.

1. As per the report received from Inquiry Officer, you remained absent from your duty on dated:-06-01-2021 without any application or prior permission of the competent authority.
2. As per inquiry report mentioned above, premises of BHU Khalifa Gul Nawaz were used by PDM supporters for cooking of Meal for PDM rally on dated:-06-01-2021 after 2:00 PM which reveals lack of responsibility on your part as you failed to prevent use of Public Property for private function being custodian of Health facility.

Consequent upon the above, you are hereby provided reasonable opportunity to submit reply of this show cause notice within (07) days of the receipt of this letter, as to why not major penalty of "removal from service" as per rule (04) of Government of Khyber Pakhtunkhwa efficiency and disciplinary rules of 2011 be imposed upon you. Furthermore, if you desire to be heard in person, then attend the Office of the undersigned on dated:-14-01-2021 (Thursday) during duty hours.

Sd/-  
(Dr.Muhammad Rasool Jan)  
District Health Officer,  
Bannu.

1. The Director General Health Services Khyber Pakhtunkhwa Peshawar
2. The Deputy Commissioner Bannu.
3. PS to the Secretary to the Government of Khyber Pakhtunkhwa Health Department Peshawar.
4. PS to the Commissioner Bannu
5. Above named Inquiry Officers.
6. The Incharge BHU Khalifa Gul Nawaz Bannu.
7. Mr.Haroon Rashid Chowkidar BHU Khalifa Gul Nawaz Bannu.

District Health Officer,  
Bannu

محرمیت جناب ڈاکٹر محمد اسرار خان ڈائریکٹر میڈیکل آفسیئر بنگلہ

جناب عالی

SHOW CAUSE NOTICE 359-65 بھولے لیٹر نمبر

Date Bannu The 12-01-2021 ذیل ہے

1. ڈاکٹر مسٹر خلفہ گلشنہ اسپتال میں بطور ڈاکٹر اور ڈیوٹی سرانجام دے رہے ہیں۔

2. ڈاکٹر مسٹر نے کبھی بھی دوران ڈیوٹی اسپتال میں کوئی شکایت کا درجہ نہیں کیا ہے۔

3. ڈاکٹر خورشید 2021-2020 کا سال کے سبب سے ملا تھا اور بعض مہینوں کے ساتھ

DHQ MATI اسپتال میں بڑے PD نمبر 995 پر 6/1/2021

رشتہ کی صورت سے صرف 6/1/2021 کا ڈیوٹی سے فارغ رہا۔

کئی کئی سالوں کی بیماریوں کے لئے اور ڈاکٹر متعلقہ ذمہ دار

2021 سے کئی دن تک بیڈ ریسٹ کی پیمائش کی تھی۔

4. ڈاکٹر مسٹر نے اسپتال میں بطور ڈاکٹر اور اسپتال میں شکایت کا درجہ نہیں کیا ہے۔

پروفیسر رشید (جوگیندار)

بھولے لیٹر نمبر 359-65  
ڈائریکٹر میڈیکل آفسیئر بنگلہ

7-1779061-11101-11101-11101

M.T.I DHQ Teaching Hospital Bannu

Out Patient Department

Annex C

9

Name: \_\_\_\_\_

محمد علی

OPD No: \_\_\_\_\_

995

152534

Date: \_\_\_\_\_

6/01

H/C

- Fec. & clivls
- GBA

H/C

- CBC
- MP
- vitidol

HVC

R

Tab. Gen-M 80/480

③ - 17

Tab. Paracet. 500mg

Cap. Lantam 600mg

① - ①

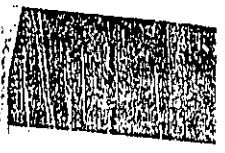
Tab. Mungram 1000mg

26 ① - ①

H/C

Adv. Bedrest for ③ days.

*[Signature]*  
 Medical Officer  
 District Hospital Bannu



(10)

Annex "D"

# NEW BASHIR CLINICAL LABORATORY



Opp D.H.O Hospital  
Gate No. 2 Banna



Dr. M. Bashir  
F.C.S., D.C.P.  
M.C.P.S., M.B.B.S.

Patient's Name Haseen Rashid Age 6 Sex M Date 6-1-2021

TEST	Normal Range	RESULT	TEST	Normal Range	RESULT
<b>HEMATOLOGY</b>			<b>SEROLOGY</b>		
Hemoglobin	M 14-18 F 12-16	G/dl	VPRC (PVC)	M 40-45 F 35-47	
Red Cells	M 4.5-6.5 F 3.9-5.6	Wcmm	Bleeding Time ivy	upto 8mm	
Total White Cells	4000-11000	/cmm	Clotting Time	upto 11min	
Differential Count			Hbs Ag		
Polymorph	40-75	%	HCV		
Lymphocytes	20-45	%	HIV		
Eosinophils	1-6	%	VDRL		
Monocytes	6-10	%	TPHA		
Basophils	0-1	%	H. Pylori		
F Platelet Count	150000-40000		Toxoplasmosis		
EESR Westergin		mm/1st hr	Mycodot		
Widal Test S. Typhi	"O"	1:320	See R.A Factor		
S. Typhi	"H"	1:150	ASO Titer		
			Typhidot		
			Blood Group		

## BIOCHEMISTRY

TEST	Unit	N. Range	Result	TEST	Unit	N. Range	Result
Glucose F	mg/dl	70-126		uric Acid (urates)	mg/dl	2-5 3-7	
Glucose R	mg/dl	80-180		Calcium	mg/dl	8.1-10.4	
Bilirubin Total	mg %	0-1.0		Triglycerides	mg %	70-150	
SGPT (ALT)	u/l	10-40		Total Cholesterol	mg %	100-200	
Alk. Phos.	U/l	4-12 10-17 12-20		S. Amylase	u/l	0-90	
Urea	mg %	0-50		Urine Pregnancy			
Creatinine	mg %	0.5-15		HBA1C		5.7-7.0	

REMARKS:-

6-1-2021

Shot on Y91  
Vivo AI camera

Darling

Technologist  
Modamin h/Tab



**OFFICE OF THE DISTRICT HEALTH OFFICER, BANNU**

No 744-57 /Dated Bannu the 22 / 01 /2021

Annex  
E<sup>11</sup>

(11)

**OFFICE ORDER:-**

Whereas, Mr. Haroon Rashid Chowkidar attached to BHU Khalifa Gul Nawaz remained absent from his duty on dated: 06-01-2021 as per inquiry report received from Dr. Hameed ur Rehman DDHO Bannu and Dr. Sajid Ayaz Khan PMO Incharge Police Hospital Bannu and due to his negligence in duty, Public Property of BHU Khalifa Gul Nawaz was used for private function on dated: 06-01-2021.

And Whereas, Show Cause Notice was served to the above named official under rules 14, (Sub rule 04) of Government of Khyber Pakhtunkhwa efficiency & discipline rules 2011 vide letter No. 359-65, Dated: 12-01-2021. (Photocopy of Show Cause Notice attached).

And whereas, reply in response to Show Cause Notice mentioned above was submitted by Mr. Haroon Rashid Chowkidar attached to BHU Khalifa Gul Nawaz, which was not accepted being non satisfactory. (Photocopy of reply attached)

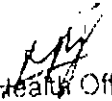
And Whereas, Mr. Haroon Rashid Chowkidar attached to BHU Khalifa Gul Nawaz was provided an opportunity of Personal Hearing under under rules 14, (Sub rule 07) of Government of Khyber Pakhtunkhwa efficiency & discipline rules 2011 but he failed to defend himself against charges/allegations.

Consequent upon the above, In exercise of Powers conferred under Rule (4) (Part B) (Major Penalty ii), major penalty of Compulsory retirement from service is hereby imposed against Mr. Haroon Rashid Chowkidar attached to BHU Khalifa Gul Nawaz Bannu with immediate effect.

Sd/-

(Dr. Muhammad Rasool Jan)  
District Health Officer,  
Bannu

1. The Director General Health Services Khyber Pakhtunkhwa Peshawar
2. The Deputy Commissioner Bannu.
3. PS to Minister Health Khyber Pakhtunkhwa Peshawar.
4. PS to the Secretary to the Government of Khyber Pakhtunkhwa Health Department Peshawar.
5. PS to the Commissioner Bannu
6. Above named Inquiry Officers.
7. The Incharge BHU Khalifa Gul Nawaz Bannu.
8. Local Accounts Section of this Office for information and necessary action.
9. Mr. Haroon Rashid Chowkidar BHU Khalifa Gul Nawaz Bannu.

  
District Health Officer,  
Bannu



## بخدمت جناب ڈائریکٹر ہیلتھ صوبہ خیبر پختونخوا (پشاور)

(12)

عنوان: حکمانہ اپیل برخلاف Office Order No. 749-57 مورخہ 22-01-2021 جاری کردہ ڈاکٹر محمد رسول جان  
ڈسٹرکٹ ہیلتھ آفیسر بنوں جسکی رو سے من اپیلانٹ کو سروس سے جبری ریٹائرڈ کیا گیا ہے۔

استدعا!

منظوری اپیل ہذا حکم زیر اپیل کا عدم و منسوخ فرمایا جا کر اپیلانٹ کو بطور چوکیدار سروس پر بحال کیا جاوے بمعہ جملہ مراعات سروس

جناب عالی!

اپیلانٹ حسب ذیل عرض کرتا ہوں۔

۱۔ یہ کہ اپیلانٹ محکمہ صحت میں بطور چوکیدار اپنی ڈیوٹی سرانجام دیتا رہا ہے جسکے خلاف کوئی شکایات وغیرہ نہیں ہے۔

۲۔ یہ کہ BHU خلیفہ گل نواز میں اگر کوئی علاقہ کے مقبرین، معززین آتے جاتے رہے ہیں تو ان سے من اپیلانٹ کا تعلق یا سروکار نہیں ہے۔ جبکہ مورخہ 06-01-2021 کو اپنے انفران کی اجازت سے من اپیلانٹ بوجہ بیماری DHQ ہسپتال بنوں میں زیر علاج درخصتی پر تھا۔ دستاویز ہمراہ درخواست ہذا نقل لف ہے۔

۳۔ یہ کہ حکم زیر اپیل سراسر غیر قانونی و بلاوجاز ہے جبکہ اپیلانٹ اپنے خاندان کا واحد کفیل ہے اسلئے بھی قابل رحم و معافی ہے۔

لہذا استدعا ہے کہ حکم زیر اپیل کا عدم و منسوخ فرمایا جا کر اپیلانٹ کو بطور چوکیدار سروس پر بحال کیا جاوے۔

مورخہ: 01-02-2021

العارضہ

ہارون الرشید/چوکیدار BHU خلیفہ گل نواز بنوں

ہارون الرشید

4491  
09/02/2021



# DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Annex  
9<sup>th</sup>

13

E-Mail Address: [nwfpdghs@yahoo.com](mailto:nwfpdghs@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230  
No. 1895 / Personnel Dated: 25/3 / 2021

To,

Mr. Haroon-ul-Rashid  
Ex-Chowkidar  
R/O Sikandar Khel Bala Haibak Malak Shah  
Bannu.

Subject: **APPEAL FOR RE-INSTATEMENT.**

Memo

Reference to your appeal dated 01.02.2021 on the subject noted above.

Your request has been considered by the competent authority but it is regretted be acceded to, as you was compulsory retired from service after observing of all codal formalities by the competent authority.

**ADDITIONAL DG (ADMN)**  
DIRECTORATE GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

24/8/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

(14)

S.A No. \_\_\_\_\_/2021

Haroon ul Rasheed..... **Versus**..... DG Health etc

**APPLICATION FOR CONDONATION OF DELAY**

Respectfully Sheweth,

- 1) That the above mentioned Service Appeal is pending before this Hon`ble Tribunal.
- 2) That the applicant/appellant was moved departmental appeal to the respondents well in time, after the receiving of office order No. 749-57, dated: 22.01.2021, wherein the major penalty of "compulsory retirement from service" has been imposed against the applicant.
- 3) That the impugned order No. 1895/personal, dated: 25.03.2021 issued and hid the respondent's office and was not delivered to the applicant in proper time but was intact, hence this very application.
- 4) That when the applicant know about the said order, the applicant personally visit the office of the respondents, and requested that the warning opportunity be given to the applicant and he may reinstated as he did not make such a big mistake, hence this very application.
- 5) That the said impugned order did not received directly to the applicant which is abusive to the questioner and such orders are illegal to the questioner, hence liable to be declared as null and void, as a result the applicant/appellant could not file an appeal to the this Hon`ble Tribunal within the legal time limit, hence this very application.

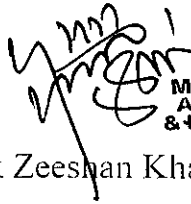
It is therefore, humbly prayed that application for the subject mentioned above may very graciously be accepted to the best interest of Justice.

15

Dated: 19.06.2021

Appellant

Through



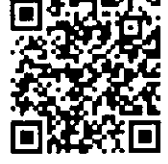
ATTESTED  
Malik Zeeshan Khan  
Advocate High Court  
& Federal Shariat Court  
of Pakistan

Malik Zeeshan Khan

Advocate High Court, Peshawar

قیمت  
50 روپے

83151



16

ایڈویکٹ: محمد وسیم خان

بار کونسل/ایسوسی ایشن نمبر: bc-14-5020

رابطہ نمبر: +92-300-5763610

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

صنبر چٹو کوخواہ سروسز ٹریڈنگ اینڈ انڈسٹریز

بعدالت جناب:

منجانب: ایڈیٹمنٹ	S. Appeal -
	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعت تحریر آنگہ

فاریوق الدین شہید

بارک اللہ شہید ولد صبر چٹو کوخواہ (ایڈیٹمنٹ)

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ برحلف دینے جو اب دعویٰ اقبال اور درخواست از ہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے اختیار یا اپنے نظر رکھا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سزاختمہ پر داختمہ منظور و قبول ہوگا دوران مقدمہ میں جو چیزیں ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 19 جون 2021  
ATTESTED  
Malik Zeeshan Khan  
Advocate High Court  
Federal Shariat Court

مقام: KPK سروسز ٹریڈنگ اینڈ انڈسٹریز کے لیے منظور ہے۔

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR. DB

No.

Appeal No. 6605 of 20 21

Haroon ul Rashid Appellant/Petitioner

The D-G KPK Health Respondent

Respondent No. 3

Notice to: —

The Distt. Health Officer Distt. Bannu.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 16/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 9/12

Day of Nov 20 21

*(for Reply)*

  
Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR,  
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.**

No.

Appeal No. 6605 of 20 21

Hayoon ul Rashid Appellant/Petitioner

The D.G Health KPK Respondent

Respondent No. 4

Notice to: -

The Incharge B H U Khalifa  
Muz Nawaz Bannu.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 16/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 9th

Day of Nov 20 21

For Reply



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD, D.B  
PESHAWAR.

No.

Appeal No. 6695 of 20 21  
Haroon ul Kasheed Appellant/Petitioner

The Director General Health KPk Respondent

Respondent No. 2

Notice to: The Secretary Health Deptt. KPk  
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 16/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 9th

Day of Nov 20 21

*(for Reply)*  
Reem  
Talwar 10/11/21



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD, DB  
PESHAWAR.

No.

Appeal No. 6605 of 20 21

Haroon ul Raheed Appellant/Petitioner

*Versus*  
The D/G Health KPK Respondent

Respondent No. 1

Notice to: — The Director General Health KPK  
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 16/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 9/12

Day of Nov 20 21

*(For Reply)*  
[Signature]

[Signature]  
Registrar  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.