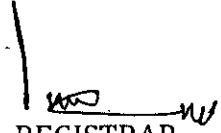





Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 113/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/01/2022	<p>The appeal of Mr. Rehmat Ali presented today by Syed Abdul Haq 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>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>11/03/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>Due to retirement of Worthy Chairman, the Tribunal is defunct, therefore case is adjourned to 14/06/2022 for the same as before.</i></p> <p style="text-align: right;"> Read</p>
	14 th June, 2022	<p>Clerk of counsel for the appellant present.</p> <p>Counsel are on strike. To come up for preliminary hearing on 01.08.2022 before S.B.</p> <p style="text-align: right;"></p> <p style="text-align: right;">(Kalim Arshad Khan) Chairman</p>

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: _____

Rehmat Ali

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>Syed Abdul Haq</u>	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	X	
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____		
26	Whether copies of comments/reply/rejoinder submitted? On _____		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Rehmat Ali
 Signature: [Signature]
 Dated: _____

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. 113 /2022

Rahmat AliAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Health and others Respondents

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3.	copy of appointment order dated 14.11.92	A	9-
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Appellant through Counsel


SYED ABDUL HAQ (ASC)
HIGH COURT DARULQAZA
BAR ROOM SWAT
Cell No 0333-9546154

1

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. _____/2022

^hRamat Ali Son of Abdul Rahman resident of Village Hazara Tehsil
Kabal District Swat. Appellant

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa, through Secretary Health at Peshawar.
- 2) Director General Health, Khyber Pakhtunkhwa at Peshawar.
- 3) District Health Officer Swat at Saidu Sharif.

.....Respondents

**APPEAL UNDER SECTION 4 OF THE GOVT. OF
KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL
ACT, 1974 AGAINST THE ILLEGAL, UNLAWFUL
ACTION WHEREBY THE RESPONDENT ARE
RELUCTANT TO ACCEPT HIS ARRIVAL REPORT
ON RETURN FROM LONG LEAVE AS ALSO
FIGURED BY THE OFFICIAL RESPONDENTS IN
LETTER DATED 10.2.2021.**

PRAYER IN APPEAL

*On acceptance of the instant appeal,
any action initiated in absence of appellant may*

kindly be declared as illegal and be set aside and the appellant be allowed to submit his arrival report for his respective post and any allege break in service (though not admitted) May kindly be assumed as continuous service and be granted all back benefits.

Respectfully Sheweth;

The facts of the instant appeal are as under.

1. That the appellant was appointed as Medical Technician in BHU Gagra vide office order dated 14.11.1992 and assumed the charge in pursuance of the appointment order *ibid.* (copy of appointment order dated 14.11.1992 is attached As annexure-A)
2. That the appellant applied for leave which was accorded to the grant of 730 days leave from 01.01.2004 to 31.12.2005, vide order bearing No.3483 dated 22.12.2003 (Copy of order dated 22.12.2003 is attached)
3. That leave granted to the appellant was further extended w.e.f. 01.01.2006. breakup of leave is as under
 - i. Leave with half pay -----526 days

ii. Leave without pay----- 1299 days

Total -----1825 days,

vide office order dated 01.12.2005 (Copy of order dated 01.12.2005 is attached)

- 4. That the appellant served the department with full devotion, however due to certain problems, the competent authority i.e. respondent No.3 granted leave without pay w.e.f 01.01.2011 to 31.12.2011 vide office Endst. No. 482-85/PF/dated 20/01/2011 (Copy of office order dated 20.1.2011 is attached)

- 5. That during the era of militancy in District Swat, the house of appellant was occupied by the Security forces and the appellant as well as his entire family was moved on to somewhere safe place due to threats thus the appellant was unable to perform his duty.

- 6. That the appellant was hardly able to approach the concerned DHO office due to uncertainty in the area for submitting application for further ^{10 years} leave, however the concerned DHO agreed with further leave of 8 years and he ^{+ 7 months} was assured that his application will be processed departmentally for the grant of leave, furthermore, it is to be mentioned here that the ^{supervision of} BHUs had gone under the

control of PPHI, and such facts was not communicated the appellant .

7. That as stated above, all the offices were closed due to fear of militancy and security risk, the appellant was unwillingly went abroad and later on the completion of eight years of *2 7 months* leave submitted arrival report to the concerned DHO and requested him to allow him for rejoining his duties.
8. That in those days, all the offices were closed and the appellant was unwillingly went abroad and as he arrived back he contacted the concern office and intended for arrival report.
9. That the concern office failed to adjust the appellant, so he requested provide him any adverse order but they failed to redress the grievances of appellant, so he filed departmental appeal before the appellate forum and he too, failed to decide his appeal one way or the other. (Copy of appeal is attached)
10. That the appellant feeling aggrieved have no other adequate and efficacious remedy except to file the instant

5

appeal before this honourable Tribunal inter alia on the following grounds.

GROUNDS

- A. That the act of respondent as not adjusting/not accepting his arrival report for joining his post is illegal, against the norms of justice, furthermore, no order whatsoever has been passed against him, and the appellant under the law is ~~still in service~~ still in service.
- B. That the appellant availed the leave upto 31.07.2020 as granted to him by the concern authority under the canopy of law and thereafter the appellant remained in close contact with the official respondents but due to security issues the appellant was unable to serve the department properly, so any order which has been passed in absence of appellant be considered as illegal on the ground that no proper opportunity of hearing or any other legal course has been adopted by the official respondents, hence the appellant having fundamental right to be treated under the article 10-A of the constitution.

- C. That the apex court as well as this honourable Tribunal has reinstated so many employees who were deprived from his legitimate rights without issuing showcause notice or mentioning any allegation of misconduct, so the act of respondent is worst kind of discrimination, hence this honourable Tribunal has ample power to direct the respondents to accept arrival report of the appellant and to adjust him on his post.
- D. That non holding of regular enquiry before imposition of any penalty by the competent authority is not maintainable in eyes of law, furthermore in such scenario the correctness of any charge could not be possible determine without a regular enquiry with participation of appellant, so on this score too, the appellant is entitled to be posted in service on his own post.
- E. That the appellant served the department for reasonable time and has remained nine years of service, so at this juncture of service the act of respondents against appellant is harsh, hence liable to be set at naught.
- F. That as per record of the respondents, the appellant is still in service, and any absentia (though not admitted) may

kindly be treated leave without pay and the appellant be adjusted on his respective post, and he be granted all the benefits on strength of his seniority.

- G. That instant appeal is within time however more the if this hon,ble tribunal presume the instant petition is time barred ,then the same may kindly be condoned as per golden principles of law.
- H. That further grounds with leave of this honourable Tribunal would be raised at the time of arguments.

On acceptance of the instant appeal, any action initiated in absence of appellant may kindly be declared as illegal and be set aside and the appellant be allowed to submit his arrival report for his respective post and any allege break in service (though not admitted) May kindly be assumed as continuous service and be granted all back benefits.

Appellant through counsel

Syed Abdul Haq
Advocate supreme court

8

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. _____/2022

Rahmat AliAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Health and others Respondents

ADDRESSES OF THE PARTIES

APPELLANT

Ramat Ali Son of Abdul Rahman resident of Village Hazara Tehsil Kabal District Swat.

CNIC: 15602-0409253-1 MOB: 03339483632

RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Health at Peshawar.
2. Director General Health, Khyber Pakhtunkhwa at Peshawar.
3. District Health Officer Swat at Saidu Sharif.

Appellant, through Counsel

SYED ABDUL HAQ (ASC)
HIGH COURT DARULQAZA
BAR ROOM SWAT
Cell No 0333-9546154

8A

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. _____/2022


Rahmat AliAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Health and
others..... Respondents

Affidavit

I *Ramat Ali Son of Abdul Rahman resident of Village Hazara Tehsil Kabal District Swat.* do hereby affirm that the contents of the above titled Service Appeal are true and correct to the best of my knowledge and belief and nothing is concealed from this honourable Tribunal.



DEPENDENT

(CNIC 15602-0409253-1)

9

OFFICE OF THE DISTRICT HEALTH OFFICER SWAT AT GULKADA.

OFFICE ORDER.

In compliance with Divisional Health Service Malakand Divn:Swat office order No.10187-92/Estab:PF Dated, 31/10/92 and No.10366-75/Estab:PF dated 5/11/1992; the following posting of Medical Technician, is hereby ordered against places noted against each.

S.No.	Name of M. Technician.	From	To	Remarks.
1.	Mr. Imran Khan	First Apptt:	BHU Malak	Against IIV.
2.	Mr. Mohd Khalid Jan.	-do-	BHC Chuprial.	Against MT.
3.	Mr. Mohd Ibarhim.	-do-	-do-	-do-
4.	Mr. Fazal Wadood.	-do-	BHU F. Pur.	-do-
5.	Mr. Javed Iqbal.	-do-	BHU Tirth.	-do-
6.	Mr. Israr Hussain.	-do-	BHU Talang.	Against IIV.
7.	Mess: Nizama.	-do-	BHU Taghma.	Against IIV BHU Korwya.
8.	Mr. Ali Khan.	-do-	BHU Bagh.	Against IIV.
9.	Mr. Mohd Ayaz.	-do-	BHU Pandir.	Against MT.
10.	Mr. Gohar Ali.	PMI Saidsharif.	To remain in PMI SWAT.	Against MT BHU Gonanger
11.	Mr. Mohd Taric.	-do-	-do-	Against MT BHU Martana.
12.	Mr. Rahmat Ali S/O Mr. Abdur Rahman.	First Apptt:	BHU Gagra.	Against IIV.
13.	Mr. Mohd Tahir.	-do-	BHU Laikob.	Against IIV BHU Kabalera.
14.	Mr. Mohd Iqbal.	-do-	BHU Nasser.	Against IIV.
15.	Mr. Mohd Aziz.	-do-	BHU Charora.	-do-
16.	Mr. Rahmat Ali S/O Mr. Ali Asghar.	-do-	BHU Gokand	-do-
17.	Mr. Sanaulah.	-do-	PMI Chahar BHU Banjut.	Against MT.

Consequent upon the above posting and the following transfer is hereby ordered with immediate effect.

S.No.	Name of official.	From	To.
1.	Mr. Fazal Karim MT	BHU Charbagh.	BHU K. shawara.
2.	Mr. Asmatullah.	BHU Banjut.	BHU Miankallay.
3.	Mr. Saifu-Din "	BHU Banjut.	BHU R. Kot.
4.	Mr. Hazrat Jamal Disp:	BHU Tirth.	CH Nadyan against his
5.	Mr. Fazal Karim MT	BHU Charbagh.	original post.
6.	Mr. Fazal Ghani. MT	BHU Bandal.	BHU Dargal.

NOTE:- Due to N.A of post upto 30/11/1992, Newly appointment of M.T. Their pay will draw w.c.f. 1/12/1992.

(DISTRICT HEALTH OFFICER
SWAT DISTRICT GULKADA.

No. 7633-89

/A-5/T-3/PF/Estab: Dt: 14/11/1992.

Copy of the above is forwarded to the :-

1. Asstt: Distt; Health Officer, Bunir at Dager.
2. All Incharge of the named Health Institutions.
3. The above named officials.
4. Account Clerk.

For information

TESTED TO BE
TRUE COPY

(DISTRICT HEALTH OFFICER
SWAT DISTRICT GULKADA.

STAMP: /**

Office of the District Coordination Officer Swat
No. 6723
15/12/03

10

OFFICE OF THE DISTRICT COORDINATION OFFICER SWAT AT GULK

No. 3483 /63/DCO/Eatt:

Dated the 02 /12/2003

O R D E R.

Sanction is hereby accorded to the grant of 730 days leave (on half pay) from 01.1.2004 to 31/12/2005, subject to title in favour of Mr. Rahmat Ali, MT attached to BHU Kotla, Swat.

DISTRICT COORDINATION OFFICER, SWAT.

No. 3484-86 /63/DCO/Eatt:

Copy forwarded to:-

- 1) The EDO Health Swat for information with reference to his Memo No. 18250/L-2/FF, dated 15/11/2003.
- 2) The District Accounts Officer, Swat.
- 3) Official concerned C/O EDO Health Swat.

DISTRICT COORDINATION OFFICER, SWAT.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH DISTT:SWAT

No. 19078-8/L-2,

Dated 22 /12/2003.

Copy forwarded to the :-

Handwritten:
18/12/03
COO (H)

- 1. M.O.I/C, BHU, Kotla.
- 2. Account Section of this office.
- 3. Official Concerned.
- 4. P/File Section.

for information.

ATTESTED TO BE TRUE COPY

Executive District Officer (Health) District Swat.

OFFICE ORDER.

Leave granted in favour of Mr, Rehmat Ali Medical Technician attached to BHU Pathpur vide this office No. 19073-S1/L-2 dated 22.12.2003 is hereby ^{extended} granted for further period of 1825 days w.e.f 1-1-2006, break up leave is as under.

- 1-Leave with half pay.....= 526 days.
- 2- Leave without pay.....= 1299 days.

Total: 1825 days.

EXECUTIVE DISTRICT OFFICER
HEALTH DISTRICT SWAT.

NO. 16683 86/L-2/FF

Dated 01/12/2005.

Copy forwarded to the:-

- 1- Medical Officer I/O BHU Pathpur for information.
- 2- Acctt: Section of this office for necessary action.
- 3- Estab: Section of this office.
- 4- Official concerned for information.
- 5- F/File of the concerned M.T for information.

Khelil/
28.11.2005

EXECUTIVE DISTRICT OFFICER
HEALTH DISTRICT SWAT.

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12

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH DISTRICT SWAT.

OFFICE ORDER.

Leave granted to Mr. Rahmat Ali Medical Technician attached to BHU Fathepur swat vide this office order bearing endorsement NO. 16683-86/L-2/PF dated 1-12-05 with effect from 1-1-2006 to 31-12-2010 is hereby extended for a further period of 365 days leave without pay w.e.f 1-1-2011 to 31-12-2011

SD/XXXXX
EXECUTIVE DISTRICT OFFICER
(HEALTH) SWAT AT GULKADA.

No 480-55/P

Dated the 20/1/2011

Copy forwarded to the:

- 01- Medical Officer I/C BHU: Fathepur swat.
 - 02- The Above named official concerned
 - 03- Account Section of this office.
 - 04- Estt: II Section of this office.
- For information.

Handwritten notes:
BHU Fathepur
Account Section
Estt: II Section

EXECUTIVE DISTRICT OFFICER
(HEALTH) SWAT AT GULKADA.

Handwritten signature
ATTESTED TO BE
TRUE COPY

بھنور جناب سیکرٹری ہیلتھ صاحب حکومت خیبر پختونخواہ پشاور

17

عنوان :- محکمہ اپیل بسلسلہ لمبی رخصت (Long Leave) سے واپسی پر Arrival Report قبول کرنے کی درخواست

جناب عالی!

مذہبانہ گزارش ہے اور زیر عنوان بالا Arrival Report / سٹے کا خلاصہ اور پس منظر کچھ یوں ہے کہ :-

1. سائل محکمہ صحت میں بحیثیت میڈیکل ٹرینیشن تعینات اور زیر احکامات نمبر 482-85/PF مورخہ 20,01,2011 جاری کردہ DHO صاحب ضلع سوات باقاعدہ رخصت پر تھا۔

2. مذکورہ رخصت ختم ہونے پر سائل نے رخصت میں بلا تنخواہ (Leave without Pay) دس (10) سال کیلئے توسیع کی بدیں صورت درخواست دی کہ سائل کا گھر پاک آرمی کے قبضہ میں تھا اور وہ خالی کرنے سے انکاری تھے جبکہ اس وقت کے طالبان گھر پاک آرمی کو دینے پر سائل کے جان کے دشمن تھے جبکہ پاک آرمی بدیں صورت سائل کے خلاف تھے کہ انہوں نے میرا گھر طالبان سے واگزار کر کے قبضہ میں لیا ہے۔ سائل کو دونوں طاقتوں کی طرف سے جان کا خطرہ تھا۔

3. گو کہ اس وقت مجاز آفس نے رخصت میں توسیع کی درخواست میں معمولی رد و بدل کر کے دس (10) سال کے بجائے آٹھ سال سات مہینے توسیع کرنے کی زبانی منظوری دیکر سائل کو رخصت پر جانے اور دفتری اہلکاران کو محکمہ کارروائی کی ہدایات دے دی۔

4. مذکورہ مدت پورا ہونے پر سائل نے 04,08,2020 کو DHO صاحب ضلع سوات کو آمدی رپورٹ (Arrival Report) پیش کر دی۔

5. دفتری سطح پر مذکورہ رخصت کا ریکارڈ موجود نہ ہونے پر DHO صاحب ضلع سوات اور سائل کے مابین متعدد مراسلت ہوئی اور تحقیق پر یہ حقیقت سامنے آنے پر کہ چونکہ اس وقت ایک طرف سوات میں امن و امان کے حوالہ سے مخدوش صورت حال (incergency) تھی تو دوسری طرف BHUs کا انتظام و انصرام PPHI کے ہاتھوں میں چلا گیا تھا اور PPHI کے حکام نے ڈسٹرکٹ ہیلتھ آفیسر صاحب کے آفس سے اس سلسلے میں کوئی مراسلت نہیں کی تھی لہذا ڈسٹرکٹ ہیلتھ آفیسر صاحب ضلع سوات نے زیر مراسلہ نمبر 1767 / PF مورخہ 10,02,2021 کو جناب ڈائریکٹر جنرل صاحب محکمہ صحت خیبر پختونخواہ سے گیپ پیریلڈ (Gap Period) کے بابت مشورہ اہدایت طلب کیا تھا اور ساتھ ہی ساتھ جناب ڈائریکٹر جنرل صاحب سے درخواست کی تھی کہ Gap Period کو Leave without Pay گردان کر Regularize کریں۔

6. جناب ڈائریکٹر جنرل ہیلتھ صاحب کے طرف سے کوئی شنوائی نہ ہونے پر سائل نے مورخہ 12,04,2021 اور 23,08,2021 اسى بابت جناب ڈائریکٹر جنرل ہیلتھ صاحب سے ہمدردانہ اپیلیں کی کہ وہ DHO صاحب ضلع سوات کے مذکورہ مراکے کا باریک بینی سے جائزہ لیں اور بحیثیت مجاز افسر کے متنازعہ بننے والی مدت کو Leave without pay گردان کر Gap period کو Regularize کرنے کے احکامات صادر فرما دیں۔

7. تاحال کوئی شنوائی نہ ہونے اور مزید یہ کہ متنازعہ مدت کے بعد سائل کے Arrival Report پر کوئی فیصلہ نہ ہونے پر سلسلہ اور گھمبیر ہوتا چلا جا رہا ہے۔

لہذا درجہ بالا کے تناظر میں انتہائی ادب کے ساتھ آپ صاحبان سے درخواست کی جاتی ہے کہ مہربانی فرما کر سائل کے متنازعہ غیر حاضری کو Leave without Pay اور Gap Period کو Regularize کرنے کے احکامات انصاف اور قانون کی بلا دستی، انسانی ہمدردی اور خالصتاً رضائے الہی کے خاطر صادر کر کے مشکور فرمائیں۔ سائل اس کارخیر کے لئے زندگی بھر مشکور رہے گا۔

العارض

آپکا تاجدار
22/9/2021
رحمت علی ولد عبدالرحمن خان
میڈیکل ٹیکنیشن

سکنہ گاؤں ہزارہ تحصیل کبل ضلع سوات

مورخہ : 22,09,2021

موبائل نمبر : 033339483632

ATTESTED TO BE
TRUE COPY

(For use in Police Department only).

19

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. dated received back

Left thumb impression.

Qualification	Date	Qualifications	Date
English		Matric Exam. Passed First Arts (R/N 16265 - Sarsia 1987, Marks obtained 514/550)	
Pashtu		B. L. or B. A. F.A. Exam. Passed	
Urdu		Pleadership examination under R/N 125975	
Plan-drawing		Training School Final examination Jullundur 1979, Marks ob.	
Finger-print	2001, U-11 No. 100101-111111	Other qualifications - 460	
Drill instructing	1979/10/10		
Court duties			
Reserve duties			

Attested by _____
General/Chief Sub-Const. Const.

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4
5
NO

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name *RAHMAT ALI*
2. Race *AFGHAN*
3. Residence *Village and P.O. Mazara Tehsil Pabul Distt. Swat*

4. Father's name and residence *ABDUL RAHMAN KHAN*
Village and P.O. Mazara Tehsil Pabul Distt. Swat

5. Date of birth by Christian era as nearly as can be ascertained *Twelve November Nineteen Hundred and Seventy (12-11-1970)*

6. Exact height by measurement *5 — 4*

7. Personal marks for identification *wound scar below right eye*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger.

Ring Finger

Middle Finger.

Fore Finger

Thumb.

ATTESTED TO BE TRUE COPY

9. Signature of Government servant.

10. Signature and designation of the Head of the Office, or other Attesting Officer.

[Signature]
Head of the Office,
Swat District Office, Swat.

1	2	3	4	5	6	7	8
Name of person	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
Health Tech AD-5	1185-12-1285	Per. 1185-12-1285				11/15/92	
		Allowed Time (2) Advance					
		increments due to pay					
		F. A. Excess in 1970 under P. No. 108975					
		pay 10, 1329/11				1/1/93	

John. H. ...
 Secy of ...
 Sub Offr ...

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55

3509

4-8-2020

13

TO,

The District Health Officer
At Gulkada, Saidu Sharif Swat.

Subject: ARRIVAL REPORT ON RETURN FROM LONG LEAVE

Respected Sir,

With due reverence I have the honor to submit my arrival report for resuming the charge of my duty on return from long leave.


Kindly accept my arrival and to please post me to any vacant post nearby to my village Hazara, Tehsil Kabal District Swat.

I will be thanked you for life long.

Obediently yours



Rahmat Ali S/O Abdur Rahman Khan
Medical technician



REQUESTED TO BE
TRUE COPY



**OFFICE OF THE DISTRICT HEALTH OFFICER
GULKADA DISTRICT SWAT**

Phone No: 0946-9240139; Fax No: 0946-9240215

Email: edohswat@yahoo.com

14

No. 10792 + RP

Dated: 06 / 8 / 2020

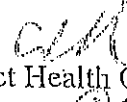
To,

Mr. Rahmat Ali S/O Abdur Rahman Khan
(Medical Technician)
Village and P.O Hazara Kabal swat.


Subject:-
Memo

ARRIVAL REPORT ON RETURN FROM LONG LEAVE.

Your arrival report received vide this office Dairy No.3509 dated 4/8/2020, you are directed to provide sanction order of long leave to this office so as to proceed further in the matter.


District Health Officer
District Swat Gulkada.

Rahman Ali


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TRUE COPY

Supra Note

15



**OFFICE OF THE DISTRICT HEALTH OFFICER
GULKADA DISTRICT SWAT**

Phone No: 0946-9240139, Fax No: 0946-9240215
Email: edohswat@yahoo.com

No. 15869/12

Dated: 04/11/2020


To,


Mr. Rahma^T Ali S/O Abdur Rahman Khan
village and P.O Hazara Kabal swat.

Subject:- ARRIVAL REPORT
Memo

You are directed to provide leave extension order as has been mentioned in your application received vide this office Dairy No.4281 dated 2/10/2020 so as to proceed further in the matter.

Rahman Ali


District Health Officer
District Swat Gulkada.


REQUESTED TO BE
TRUE COPY

232, 2021
D G office 6805

23, 2, 2021



OFFICE OF THE DISTRICT HEALTH OFFICER
GULKADA DISTRICT SWAT

Phone No: 0946-9240139, Fax No: 0946-9240215
Email: cdohswat@yahoo.com

16

No. 1767/13

Dated: 10/2/2021

To,

The Director General Health
Services Khyber Pakhtunkhwa
Peshawar.

Subject:- ARRIVAL REPORT
R/Sir,

I have the honour to state that Mr.Rahmat Ali PHC Tech (MP) MT attached to BHU:Mashkōmai swat had been granted 730 days leave with effect from 1/1/2004 to 31/12/2005 vide DCO office order No.3483/63/DCO /Estt: dated 2/12/2003(copy attached) his leave was extended for further period of 1825 days with effect from 1/1/2006 to 31/12/2010 vide this office order NO.16683-86 /PF dated 1/12/2005 (copy attached) and further extended for 365 days leave with effect from 1-1-2011 to 31-12-2011,vide this office order No.482-85/PF dated 20/1/2011 (copy attached) .

During his leave Mr.Sultani Room PHC Tech (MP)MT was transferred from District Buner to District Swat vide your office order No.13441-45/AE-VI dated 4/4/2009 on the same leave vacancy post.

It is further added that now Mr.Rahmat Ali PHC Tech (MP) MT has submitted arrival report on return from leave for further posting on 4/8/2020 (copy attached) according to him on the expiry of his leave granted vide this office order No.482-85/PF dated 20/1/2011, in the light of circumstances faced by him ,he has applied for further extension in his leave up to 31/7/2020,while there is no evidence of his application on the record of this office .His salary was stopped since 11/6/2007.

It is worth mentioning that at that time the administration of BHUs has gone under the control of PPHI and they had not communicated to this office in the matter .

Therefore you are requested to kindly advise this office regarding the gap period 1/1/2012 to 4/8/2020,requested that may be regularized as leave with out pay.

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TRUE COPY

District Health Officer
District Swat Gulkada.

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
					Period			Government to which debitable

Appointed as Health Officer, 1901-02
 04-9 (1187-2-208), 1902-03
 11/4/04 at 11/16/04
 11/14/04, 11/14/04, 11/14/04, 11/14/04
 11/14/04, 11/14/04, 11/14/04, 11/14/04
 11/14/04, 11/14/04, 11/14/04, 11/14/04
 11/14/04, 11/14/04, 11/14/04, 11/14/04

11/14/04

Health Officer,
 Sub-Divisional Surgeon

Health Officer,
 Sub-Divisional Surgeon

Transferred to 1846.

Service Verified

15/11/28

Health Officer, Dist. Surg. appt. 8/11/04
 at Dist. of Luv of 1846, Prabru
 via 3/10/04 order no. 2162-6/93 dated 11-12-93.

Health Officer,
 Sub-Divisional Surgeon

11/14/04

Health Officer,
 Sub-Divisional Surgeon

(Signature)

ATTESTED TO BE TRUE COPY

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term 'Pay'	7 Date of appointment	8 Signature of Government servant	9 Signature of the officer in attestation in attestation of columns 1
Health Officer, P. D. ... (1185-12-2285)			1704	✓		1-12-54	[Signature]	
		... revised pay scale 1954						
		... Govt. of ...						
			207			1-12-54	[Signature]	
	Two ad-hoc of the ...		Provided that ...			[Signature]	Health Officer, District of ...
		Pay fixed in the revised ...	218			1-12-54	[Signature]	

District Health Officer,
Sub-District of Gulbada.

TESTED TO BE
TRUE COPY

9	10	11	12	13		14	15
Signature and designation of the officer or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
				Period	Government to which debitable		
	30/11/81	Div.				SERVICES VERIFIED UPTO 30/11/81	
						SERVICES VERIFIED UPTO 30/11/81	
						SERVICES VERIFIED UPTO 30/11/81	
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						SERVICES VERIFIED UPTO 30/11/81	
						SERVICES VERIFIED UPTO 30/11/81	

ATTESTED TO BE TRUE COPY

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
M. S. ...			22,000/-			12/97	
...							
...							
...			23,511/-			12/98	
...							
...			24,787/-			12/99	
...							
...							
...			25,751/-			12/2000	
...							
...							
...							
...							
...							

[Handwritten Signature]

ATTESTED TO BE TRUE COPY

8 Signature of government servant	9 Signature and designation of the head of the office or other attesting officer in attestation (columns 1 to 8)	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government			
						Period			Government to which debitabale
		11/11/97							
		11/11/98							
	District Health Officer, Govt of Calcutta.			District Health Officer, Govt of Calcutta.			District Health Officer, Govt of Calcutta.		
		11/11/98							
	District Health Officer, Govt of Calcutta.			District Health Officer, Govt of Calcutta.			District Health Officer, Govt of Calcutta.		
		30/11/2000							

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27

1	2	3	4	5	6	7	8
	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
			Pay fixation on A/C of 7600 adverse vicarite on B. A 1-11-2001.				
			Pay on 31-10-01 Rs. 2575/-				
			from 1-11-2001 136-				
			adverse vicarite on B. A 1-11-2001 Rs. 2769/-				
			Executive Officer (Special) District, Warangal B. A. K. Reddy 1-11-2001				
			Pay on 31-10-01 Rs. 2670				
			Pay on 1-11-2001 Rs. 2769				
			Pay on 1-11-2001 Rs. 2860				
	med. Fed. 2410-145-6740	R.D.S. 9.	R.D.S. 6110/01				12 1/2

ATTESTED TO BE TRUE COPY

Name	Whether substantive or officiating and whether permanent or temporary	If officiating, (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
Mulla Lat Pechawar	1999		4730/-			12/04/77	
Mulla Lat Pechawar	1999		4730/-	5410/-		07/05/77	
	Departmental P... Pay Scale: Rs... w.e.f 1-7-2005 dated 1-7-2005 Pay fixed to Rs...	2770-165-7720	4730/-	5410/-		07/05/77	
		E.D.O. (P) Pechawar					
			5570/-			12/05/77	

(2005)
Office of the Accountant General
N.W.F.P Peshawar
Pay Fixed in the revised basic pay scale of Rs. 2770-165-7720 at Rs. 5410/- P.M on 01-07-2005 with next increment on 01-12-2005
Account Officer
Pay Fixation Party N.W.F.P Peshawar

RESTRICTED TO DE
TR

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government		
Period		Government to which debitale					
	30/11/67	Arr. from ...	[Signature]			[Signature]	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
	30/06/66	Pay Revised	[Signature]			[Signature]	
	19/6	1/2 LS ...					
	7-80/6	1/2 LS ...					

Executive Dist. Officer
(Health) District Swat,
Gulistan.

Executive Dist. Officer,
(Health) District Swat,
Gulistan.

Gravill F Leave 1825
days w.e.f 1-1-2006, break
up Leave ...
1- Leave with half pay 526 my
2- Leave without pay 1299

Total 1805 days

w.d. this ...
1-2/1 PF done

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TRUE COPY

BEFORE THE SERVICE TRIBUNAL KPK, Peshawar
BENCH

WAKALAT NAMA

34

Case No. _____ of 2022

CASE TITLE

Rahmat Ali

VERSUS

Govt

I, Petitioner, do hereby appoint SYED ABDUL HAQ Advocate, High Court in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct prosecution or defence of the said case at all its stages.
3. To receive payment of and issue receipts for, all money that may be or become due and payable to us during the course of proceedings.
4. To do any act necessary or ancillary to the above acts, deed and things.
5. To appoint any other counsel to do any/all of the acts, deeds and things.
6. I/We shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non-appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

In witness whereof I/We have signed this Wakalatnama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this, 26/01/2022.

Rahmat Ali
Signature of Executant

Attested & Accepted by:

Syed Abdul Haq
SYED ABDUL HAQ
Advocate, High Court
Cell No. 0311-0950959