

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

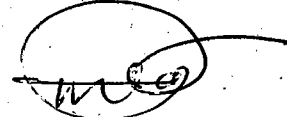
Service Appeal NO. 912/2022

Dr Hafeez Ullah.....Appellant  
**VERSUS**  
Govt of KPK & others.....Respondents

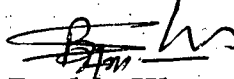
**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Parawise reply on Appeal		1-4
2.	Affidavit		5
3.	Parawise Reply on Application		6-7
4.	Affidavit		8
5.	<b>Copy of Appeal</b>	<b>A</b>	9-13
6.	<b>Copy of the inquiry notification</b>	<b>B</b>	14-15
7.	<b>Copies of the relevant documents</b>	<b>C</b>	16-30
8.	<b>Wakalat Nama</b>		31

Through



**RESPONDENT NO 5**



**Bashir Khan Wazir**  
**Advocate, High Court**  
**Peshawar**

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal NO. 912/2022

**Dr Hafeez Ullah.....Appellant**  
**VERSUS**  
**Govt of KPK & others.....Respondents**

**PARAWISE REPLY OF THE APPEAL FOR AND ON BEHALF**  
**OF RESPONDENT NO 5**

**Respectfully Sheweth:**  
**Preliminary Objections:**

1. That Appellant has got no legal competency local standi / reasons / cause to file instant Service Appeal.
2. That the instant Service Appeal is fully misconceived and not maintainable in the eyes of law.
3. That the Appellant has got no locus standi to file the Appeal.
4. That the Appellant is estopped by his own conduct to bring the Appeal in hand.
5. That the Appellant has come to the court with unclean hands, they has suppressed the material facts from the Hon'ble Court and tried to mislead, their Appeal deserves dismissal on this score alone.
6. That the Appellant concealed the material facts from this Hon'ble Court and came to this Hon'ble Tribunal with unclean hand as he was the Junior most Civil Servant in BPS-17 and the post in question is of BPS-18, however the Appellant being the influential person occupied the post of DHO north Waziristan BPS-18 and his posting / Transfer was challenged by one Dr Israr ul Haq in Appeal No 7129/2021 which has been admitted and temporary injunction was allowed while suspended his transfer order on dated 05.08.2021 which is still in field and even the Appellant did not bother to allow the said incumbent for his position as the said doctor was suitable because he was in BPS-18 and belongs to management cadre. The concealment of facts on behalf of Appellant in the present case is amount to deceive this Hon'ble Tribunal and on this score alone the Appeal of the Appellant is liable to be

2

dismissed with heavy cost. **(Copy of Appeal is attached as annexure A)**

**REPLY ON FACTS:**

1. That para No 1 needs no comments, the Appellant is the most junior person and he was incompetent for the post of BPS-18 as DHO North Waziristan on his own pay Scale, which has been discouraged by the August Supreme Court and such like posting has been declared null and void.
2. That Para No 2 is incorrect, hence denied. Infact the present transfer order of the Appellant has been done in the connection of inquiry. **(Copy of the inquiry notification is attached as annexure B)**
3. That Para No 3 is pertains to record.
4. That Para No 4 needs no comments, pertains to record and the better position will be explained by the official Respondents.
5. That para No 5 is correct needs no comments, however it is pertinent to mention here that due to the active connivance of the political influence he was transferred on the subject post on the place of competent person, who was in BPS-18.
6. That Para No 6 is correct. The influence of the Appellant is very much establish from this order that one day before he was transferred and on the next day he has used his influence while cancelled the said order through influence.
7. That Para No 7 is incorrect, hence denied. As stated above in the Appeal of Dr Israr ul Haq, the Appellant transfer order was suspended and he was supposed to obey the order of this Hon'ble Tribunal, however he refused the order of this Hon'ble Tribunal and even not allowed the said Appellant to perform his duty on the subject post. The order dated 10.03.2022 is competent and the official Respondents correctly issued the said order in favour of the competent person as being senior most and serving in BPS-18 which is required for the subject post.
8. That Para No 8 needs no reply.
9. That Para No 9 is incorrect, hence denied. The Respondent No 5 was correctly transferred to the subject post as he

3

belongs to the Management Cadre and this Hon'ble tribunal has rendered a number of Judgment on the subject post to be transfer the Management Cadre incumbent.

10. That Para No 10 is incorrect, hence denied.

**REPLY ON GROUND:**

1. That Ground 1 is incorrect, hence denied.
2. That Ground 2 is incorrect, hence denied.
3. That Ground 3 is incorrect, hence denied. Infact the Appellant being unexperienced person and was posted first time in such like key post, inspite of the fact that he was most Junior and the Impugned order dated 10.03.2022 was issue in the result of inquiry initiated against the Appellant on the basis of poor performance as the Polio disease has been spread in the concerned District.
4. That Ground 4 is incorrect, hence denied. The Transfer order of the Appellant on the place of other DHO was also premature and the most senior and competent person was transferred and the present Appellant was posted on the subject post which is also subjudice before this Hon'ble Tribunal and the present Appellant has been transferred due to the inquiry initiation and he has been put under inquiry.
5. That Ground 5 is incorrect, hence denied. In fact the Appellant was not fit for the subject post, because he had issued various office orders of the subordinate of the office, whereby the Appellant issued termination order of the certain employees without issuance of any show cause notice and later on he had issued show cause notice and thereafter he had issued warning and later without reinstatement order released their salaries. These facts also brought into the notice of official Respondents and material documents have been collected by the Official Respondents. **(Copies of the relevant documents are attached as annexure C)**
6. That Ground F is incorrect, hence denied. The view of the August Supreme Court has been changed recently, so the Judgment mentioned in this Para is irrelevant.
7. That Ground 7 is incorrect, hence denied.


4

8. That Ground 8 is incorrect, hence denied. the first posting of the Appellant is illegal therefore after served on the subject post he has done material illegalities and irregularities and on the basis of which he was put under inquiry.
9. That Ground 9 incorrect, hence denied. no relevancy with the present case.
10. That Ground 10 incorrect, hence denied. The progress report has been prepared by the Appellant which is negated after initiating of the inquiry proceedings.
11. That Ground 11 incorrect, hence denied. The Respondent No 5 is the most competent and belongs to the management Cadre is entitled to complete his tenure on the subject post.

**For the reason stated above the Service Appeal may graciously be dismissed with the Special Cost.**

**Through**

  
**RESPONDENT NO 5**

  
**Bashir Khan Wazir  
Advocate, High Court  
Peshawar**

5

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**


Service Appeal NO. 912/2022

**Dr Hafeez Ullah.....Appellant**  
**VERSUS**  
**Govt of KPK & others.....Respondents**

**AFFIDAVIT**

I, Wazir Khan Safi Management Cadre (BPS-19) Under Transfer the DHO North Waziristan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Comments** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



  
**DEPONENT**

6

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal NO. 912/2022

**Dr Hafeez Ullah.....Appellant**

**VERSUS**

**Govt of KPK & others.....Respondents**

**PARAWISE REPLY ON THE APPLICATION FOR AND**  
**ON BEHALF OF RESPONDENT NO 5**

**Respectfully Sheweth:**

**Preliminary Objections:**

1. That Applicant has got no legal competency local standi / reasons / cause to file instant Application.
2. That the instant Application is fully misconceived and not maintainable in the eyes of law.
3. That the Applicant has got no locus standi to file the Application.
4. That the Applicant is estopped by his own conduct to bring the Application in hand.
5. That the Applicant has come to the court with unclean hands, they has suppressed the material facts from the Hon'ble Court and tried to mislead, their Application deserves dismissal on this score alone.

**REPLY ON FACTS:**

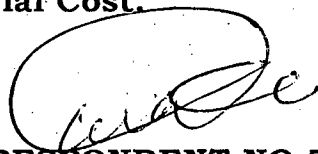
1. That para No 1 needs no comments.

7  
1

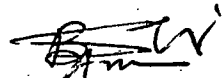
2. That Para No 2 is incorrect, hence denied.
3. That Para No 3 is incorrect, hence denied.
4. That Para No 4 is incorrect, hence denied.
5. That para No 5 is incorrect, hence denied.

**For the reason stated above the Application may graciously be dismissed with the Special Cost.**

**Through**



**RESPONDENT NO 5**



**Bashir Khan Wazir  
Advocate, High Court  
Peshawar**



8

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**


Service Appeal NO. 912/2022

**Dr Hafeez Ullah.....Appellant**  
**VERSUS**  
**Govt of KPK & others.....Respondents**

**AFFIDAVIT**

I, Wazir Khan Safi Management Cadre (BPS-19) Under Transfer the DHO North Waziristan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Reply** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



16/6/22  
  
**DEPONENT**

9

A'

A. Ahmad

(24)

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

APPEAL NO. 2/29 /2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7393

Dated 02/8/2021

Dr. Muhammad Israr-Ul-Haq, Management Cadre (BPS-18)  
Posted as District Health Officer, District North Waziristan.

..... APPELLANT

**VERSUS**

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 4- Dr. Hafizullah, General Cadre (BPS-17), under transfer/ posted as District Health Officer, North Waziristan (OPS), District North Waziristan.

..... RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 09-07-2021 WHEREBY THE PRIVATE RESPONDENT NO.4 HAS BEEN POSTED AGAINST THE POST OCCUPIED BY THE APPELLANT IN UTTER VIOLATION OF TRANSFER/POSTING POLICY AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD.**

**PRAYER:**

*Ad-to-day*  
*Registrar*  
*02/08/2021*

That on acceptance of this appeal the impugned Notification dated 09-07-2021 may very kindly be set aside to the extent of posting of the private respondent No.4 against the post occupied by the appellant and the respondents may kindly be directed not transfer the appellant from the post of District Health Officer, District North Waziristan. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present appeal are as under:-**

- 1- That appellant is the employee of respondents Department and belongs to the Management cadre, and was lastly transferred to the post of District Health Officer, District North Waziristan vide notification dated 06-03-2020. That appellant assumed the charge of the mention post on 10-03-2020. Copies of the notification dated 06-03-2020 and charge report are attached as annexure .....**A & B.**
- 2- That it is important to mention here that vide notification dated 11-09-2020 the appellant was prematurely transferred and posted at the disposal of D.G Health Services and one Dr. Muhammad Ikram was posted against the post of appellant. Copy of the Notification dated 11.09.2020 is attached as annexure ..... **C.**
- 3- That just after few days vide notification dated 17-09-2020 the one who posted against the post of appellant was suspended with immediate effect and the transfer order dated 11.09.2020 never actualized in its form, resultantly the appellant was allowed to work on his own post of the DHO, District North Waziristan. That vide order dated 18-09-2020 the transferee of the order dated 11.09.2020 was directed to report to the D.G Health Services Peshawar. Copies of the notification dated 17.09-2020 and 18-09-2020 are attached as annexure.....**D &E.**
- 4- That the transferee feeling aggrieved from the suspension order dated 17-09-2020 preferred a writ petition No. 886-B/2020 before the August Peshawar High Court, Bannu Bench and the August Court vide order dated 23.09-2020 directed the respondents that "*they may continue inquiry proceedings but no adverse order shall be taken against the petitioner/ transferee*". That in the meanwhile the appellant was performing his duty as DHO, District North Waziristan. Copy of the order dated 23.09.2020 is attached as annexure.....**F.**
- 5- That during pendency of the mention writ petition another transfer order/ notification dated 08-01-2021 was issued and the same was also suspended by the August Peshawar High Court, Bannu Bench vide order dated 11.01.2021. Copies of the notification dated 08-01-2021 and order dated 11.01.2021 are attached as annexure ....**G&H.**
- 6- That as the appellant was performing his duty on his post but vide impugned order dated 09-07-2021 the private respondent No. 4 was posted against the post, held by the appellant, in utter violation of the posting/ transfer policy of the provincial government and the cadre policy. Copy of the impugned notification dated 09-07-2021 is attached as annexure .....**I.**

11  
26

7- That appellant feeling aggrieved from the impugned notification/ order 09-07-2021 preferred departmental appeal on 10-07-2021 and no response has been given by the respondents within the stipulated time period. Copy of the departmental appeal is attached as annexure .....J.

8- That the appellant feeling aggrieved and having no other remedy but to file this appeal on the following grounds amongst others.

**GROUND:**

- A- That the impugned Notification dated 09.07.2021 to the extent of private respondent No. 4, placed at serial No. 6 of the impugned notification, is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside to the extent of appellant and private respondent No.4.
- B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the impugned Notification dated 09.07.2021 has been issued by the respondent No.2 in arbitrary and malafide manner, hence not tenable and liable to be set aside to the extent of appellant and private respondent No.4.
- D- That it is worth to mention here that private respondent No. 4 belongs to the General Cadre whereas the appellant belongs to the Management Cadre and the question/ disputed post is to be held/ hold by official belongs to the management cadre.
- E- That suitable person be posted at suitable post, in this respect this Honorable Tribunal vide judgment dated 09-08-2019 in Appeal No. 823/2019 and judgment dated 07-07-2020 in appeal No. 944/2020 have held that no person from General Cadre be posted on the post of Management cadre and only the person from the management cadre be posted on the post of management cadre. So the question post is one of the management cadre post and the appellant is belongs to the management cadre but the private respondent No. 4 belongs to the general cadre hence he (private respondent No.4) cannot be posted at this post. Copies of the judgment dated 09-08-2019 and dated 07-07-2020 are attached as annexure .....K.

12

(27)

- F- That the impugned Notification dated 09.07.2021 is based on discrimination, favoritism and nepotism, hence not tenable to the extent of private respondent No. 4 in the eye of law.
- G- That the impugned Notification dated 09.07.2021 has neither been in the best interest of public service nor in exigencies of service, hence not tenable and liable to be set aside.
- H- That the impugned notification dated 09.07.2021 is violative of Clause-I, IV and XIII of the transfer/posting policy of the Government of Khyber Pakhtunkhwa. Copy of the transfer/posting policy is attached as annexure ..... L.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of appellant may be accepted as prayed for.

APPELLANT



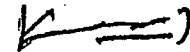
MUHAMMAD ISRAR-UL-HAQ

THROUGH:

NOOR MOHAMMAD KHATTAK

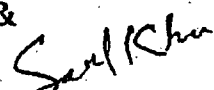


KAMRAN KHAN



UMER FAROOQ

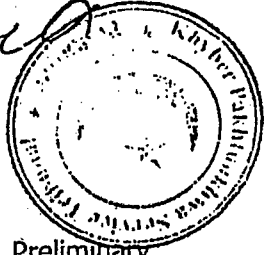
&



SAID KHAN

ADVOCATES

13


Ames  
28  
D  


05.08.2021 Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contends that the transfer of the appellant through impugned order is against the posting/transfer policy of the Provincial Government. Let the respondents be put on notice for regular hearing. The appeal is admitted for regular hearing subject to all legal objections to be determined during full 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 22.09.2021 before the D.B.

An application has been filed alongwith the appeal for interim relief. Notice of the application be also given to the respondents. The operation of the impugned order shall remain suspended to the extent of appellant and respondent No. 4 till next date.

  
Chairman

Certified to be true copy  
  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Preparation of Application 05/08/21  
Number of Pages 18  
Copies 800  
Urgent 10/-  
Total 10/-  
Name of ... 06/08/21  
Date of Delivery of Copy 06/08/21



OFFICE OF THE DISTRICT HEALTH OFFICER  
TRIBAL DISTRICT AT MIRANSHAH

Tel: (0928) 1007811 FAX: (0928) 111667

Email: dhco700@pco.org.pk dhco700@pco.gov.pk

No.

PS/MD/7/1000/Polio

Date:

To

Director General, Health Services, Peshawar

Subject

**REPORT ON THE DETECTION OF TYPE-1 WILD POLIO VIRUS (WPV1) IN NORTH WAZIRISTAN TRIBAL DISTRICT**

Dear Sir,

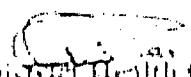
The undersigned took the office charge as District Health Officer of North Waziristan on 10-03-2022 by relieving Dr Hafiz Ullah. As I assumed the charge a multiple number of issues were created by the previous management either due to his negligence, lack of medical experience's or having no management capabilities, which cost the nation with international defamation to report of Polio Virus after 15 months of polio free Pakistan. I was able to detect a case of wild polio virus in North Waziristan (D) in village Lashan Colony (H) in Miran. A 15 month child which increase today to one (01) another case in village Khandji Miran in 10 month child and in village Mikhnon Khel, Tappi Miran Shah-03 in process thus total come 1000 cases and one is in process expected.

As per internal meetings with health staff and analysis in order to dig out the factors, it was revealed that the previous management has just played a role of social media actor to show himself a honest, hard worker and dedicated one but the fact is completely chaotic in field. A fake polio campaign was launched, most of the areas are not vaccinated with polio drops; the cases may be rise 10 to 15 number in coming days. The second big factor was that as Dr Hafiz Ullah assumed the charge of office, more than 200 employees salaries were stopped which was another big factor as most of the population remained unvaccinated due to unavailability of health staff as the North Waziristan Paramedic Association went on district wise strike/protest and boycott of polio campaign was his demand taken on those days with solidarity of terminated staff / stoppage of salaries which result to the current situation.

Such heinous act is tantamount to not forgiveness as it cost with obliteration of our generation which is the future assets of our nation.

Now, the district wise campaigns are being started and utmost efforts are being placed in field to cover the whole population, but polio cases are imminent to occur as the population has not been vaccinated properly, in previous campaigns.

Therefore, it is suggested to conduct a proper inquiry into the matter in order to dig out the negligence, incapability, on part of defaulter one as it degenerate our nation and bring bad name for the country on international forum.

  
District Health Officer

North Waziristan Tribal District

No.

/Polio,

Copy forwarded for information & necessary action please.

1. The Deputy Commissioner, North Waziristan Tribal District
2. PS to Secretary Health, Khyber Pakhtunkhwa
3. PS to, Commissioner Bannu Division, Bannu
4. HQ-7 Div Camp Area at Miran Shah (IS) Branch
5. PS to Chief Secretary, Khyber Pakhtunkhwa
6. EOC, Khyber Pakhtunkhwa
7. DPCR North Waziristan

District Health Officer  
North Waziristan Tribal District



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

18/15

Dated: Peshawar the 28<sup>th</sup> April, 2022

**NOTIFICATION**

**NO.SOH (E-V)/4-4/2022**

An inquiry Committee consisting of the following members is hereby constituted against Dr. Hafizullah Khan the then DHO North Waziristan, with regard to the detection of recent Polio case:-

- i. Dr. Syed Ijaz Ali Shah, Director IMU (BS-19), Health Department -**Chairman**; and
- ii. Dr. Makhdoom Safdar, Deputy Director (EPI) BS-18, Directorate General Health Services, Khyber Pakhtunkhwa -**Member**

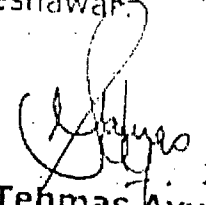
The committee is directed to submit detail report within (07) days positively.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

No. 1868-1878 / Notification of even No. & dated:

Copies forwarded to the:-

1. Director General Health Services, Khyber Pakhtunkhwa.
2. Provincial Coordinator, EOC, Khyber Pakhtunkhwa, Peshawar.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Commissioner, Bannu.
5. Deputy Commissioner, North Waziristan.
6. Director, EPI, Khyber Pakhtunkhwa.
7. District Health Officer, North Waziristan.
8. DHO, Bannu.
9. PS to Secretary Health Department Khyber Pakhtunkhwa
10. Deputy Director (IT), Health Department, Peshawar.

  
(Tehmas Ayyub)  
SECTION OFFICER (E-V)

28/4/2022



16

# پیر امید بیکل ایسوسی ایشن ضلع شمالی وازیرستان، میرانشاہ

جنرل سیکریٹری  
ملک فرمان اللہ



ملک بٹال انجین

20/8/2021

بخدمت جناب سیکریٹری صحت خیبر پختون خواہ پشاور

مضمون درخواست برائے قانونی و تاجری کارروائی بر خلاف نام نہاد ڈی ایچ او ڈاکٹر حفیظ اللہ

جیسا کہ آپ صاحبان کو معلوم ہوگا کہ جب سے ڈاکٹر حفیظ اللہ نے ٹرانسفر کاس کروا اپنے اوسان چلے ہو گئے۔ ملک اپنا دانت تو اوزان کچھ بھینٹا ہے۔ ڈاکٹر موصوف نے ہجرتی 6 اگست 2021 کو سیکٹروں ملازمین کو ہینڈل کر کے واپس اور ذاتی ایٹ اور کینٹ اقرابا پر وہی اور اس میں کرایہ کروٹے اشارے پر غیر قانونی طور پر اس کو استمال کر کے غیر قانونی طریقے سے بر طرف کئے۔ اور ایک ٹروہ جو کہ تالیق سیکٹر تار تھ و وزیرستان میں ڈائریکٹ انڈکشن (direct induction) کر رہے۔ جو کہ پچھلے 2 back dates مریکوں میں لوگوں کو غیر قانونی طریقے سے ہجرتی کرتے ہیں، ڈاکٹر موصوف ان کے ساتھ بیسوں کے بدلے ذیل (deal) کر کے اس سے سیکٹروں ملازمین کو ہینڈل کر دے گا، اس کے نتیجے میں وہ بر طرف کئے تاکہ ان لوگوں کے لئے جگہ مہیا کی جاسکے اور دوسری یہ کہ انجمن ان ملازمین کی تجویزیں بند کر کے ایف مار پیٹھ و حسن فیصل سے دو نمبر کے ملازمین کو ٹرانسفر کرانے میں دلچسپی رکھتے ہیں۔ اور نام نہاد ڈی ایچ او ڈاکٹر حفیظ اللہ ایف مار پیٹھ و حسن فیصل سے ہر بندے پر چار سے پانچ لاکھ روپے لینا شروع کی ہے۔ جو کہ انجمن چند دن پہلے ایف مار پیٹھ و حسن فیصل سے تین بندوں کو ٹرانسفر کر دئے ہیں۔ ڈی۔ بی۔ ایف۔ ایس پشاور سے جاری شدہ ایک لیٹر کو بنیاد بنا کر وہ ملازمین بر طرف کئے جو کہ آٹھ پندرہ تھے، اب ڈی۔ بی۔ ایف۔ ایس نے ڈی۔ ایچ او اور تھ و وزیرستان کو عدالت کی روشنی میں ایک لیٹر بھیجا ہوا ہے۔ جس میں ان کو یہ جاہت کی گئی ہے کہ ان کو جلد سے جلد implement کر کے مجھے واپس جواب دے دیں۔ اور نام نہاد ڈی ایچ او ڈاکٹر حفیظ اللہ نے ان کو بھی implement کرنے سے صاف انکار کر دیا۔ جو کہ سارا سطر ظلم، جبر اور ذاتیات پر اترتا ہے۔ لہذا آپ صاحبان سے عاجزانہ درخواست ہے کہ اس خلاف جلد سے جلد قانونی کارروائی شروع کی جائے اور ساتھ میں یہاں سے جتنا جلد ہو سکے ٹرانسفر کر دیا جائے تاکہ ان کے خلاف سے روایہ ٹریک ہے، اور نام نہاد ڈی۔ ایچ او کو اسٹاپ چھانے سے قائل ہے، اور ساتھ میں زمین اور زرعی محلات خراب ہونے کا بھی مدعا ہے۔

20/08/2021

پیر امید بیکل ایسوسی ایشن ضلع شمالی وازیرستان میرانشاہ

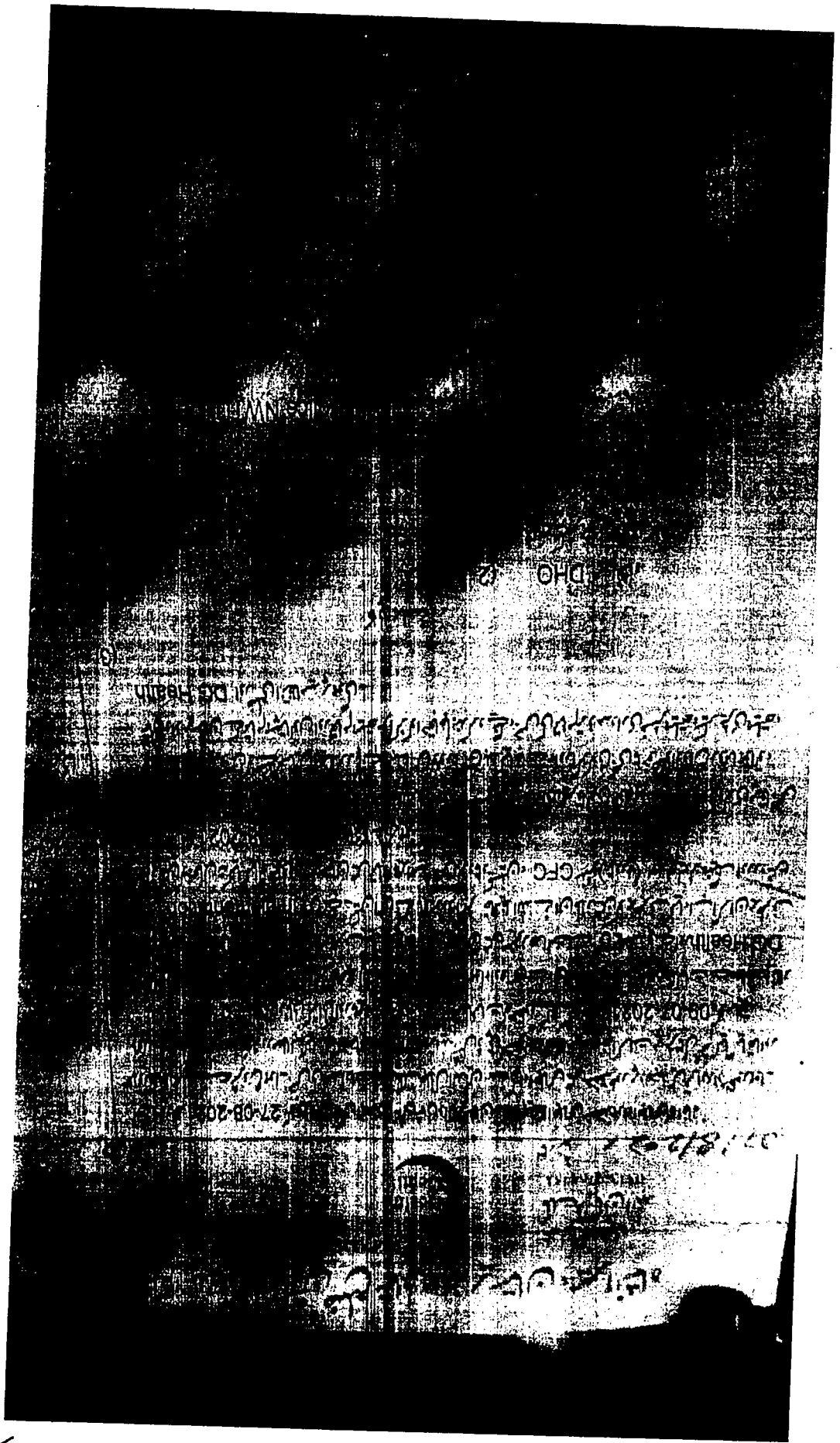
- 7- ڈی ایچ او اور تھ و وزیرستان۔
- 8- صوبائی صدر ری امید بیکل ایسوسی

- 1- وزیر اعلیٰ خیبر پختون خواہ۔
- 2- گورنر خیبر پختون خواہ۔
- 3- سیکریٹری صحت خیبر پختون خواہ۔
- 4- ڈی ایچ او ضلع شمالی وازیرستان۔
- 5- ڈی ایچ او تھ و وزیرستان۔
- 6- زمین و زرعی محلات خراب ہونے کا بھی مدعا ہے۔

پیر امید بیکل ایسوسی ایشن

20/8/2021  
جنرل سیکریٹری پیر امید بیکل  
ملک فرمان اللہ داؤد

سینئر نائب صدر  
شبید اللہ  
نائب صدر اول  
ملک گل صاحب جان  
نائب صدر دوم  
شیخ اللہ  
ایڈیشن سیکریٹری  
نور حیات خان  
جانیٹ سیکریٹری  
سلیم داؤد  
ڈی ایچ او سیکریٹری  
رسول مرجان  
پریس سیکریٹری  
زابد اقبال  
ڈی ایچ او سیکریٹری  
رشم تیار  
ایس سیکریٹری  
رحمن اللہ



71

71

18

## پیرامیڈیکل ایسوسی ایشن ضلع شمالی وازیرستان، میرانشاہ

رجسٹرڈ نمبر: 12347-19-E III 1970

جنرل سیکریٹری  
ملک فرمان اللہ  
0333-5258010



صدر  
ملک جلال الدین  
0333-5258010

تاریخ: 24/9/2021

29

انج. ہوری 24-09-2021 کو پیرامیڈیکل ایسوسی ایشن شمالی وازیرستان کے کابینہ کا اجلاس منعقد ہوا، اجلاس کا آغاز تلاوت کلام پاک سے شروع ہوا۔ جس کی صدارت صدر ملک جلال الدین نے کی، اجلاس میں متفقہ طور پر درج ذیل قرارداد منظور ہوئی۔ ہم پیرامیڈیکس شمالی وازیرستان نے 45 دن تک مسلسل DHO ہارٹھ کیساتھ مذاکرات کئے جس میں انہوں نے پیرامیڈیکس کے تمام مطالبات منظور کئے تھے اور ساتھ میں بند کھوپڑیاں ریٹیز کرنے کا بھی وعدہ کیا تھا، لیکن DHO اپنے ان تمام وعدوں سے منکر کیا۔ جس کی وجہ سے منگل یعنی 28/09/2021 سے DHO آفس کے سامنے دھرنا تک جاری رہیگا جب تک ڈاکٹر حانیظ اللہ کوڑا سفر نہ کیا گیا ہو، جس کی تمام تر ذمہ داری DC میرانشاہ، سیکریٹری ہیلتھ اور DG ہیلتھ پشاور پر ہوگی۔

سینئر نائب صدر  
شہید اللہ  
نائب صدر اول  
ملک گل صالح جان  
نائب صدر دوم  
سمیع اللہ  
ایڈیشنل سیکریٹری  
نور خیات خان  
جانیت سیکریٹری  
سلیم داؤد  
فائل سیکریٹری  
رسول مرجان  
پریس سیکریٹری  
زاہد اقبال  
کوآرڈینیٹیشن سیکریٹری  
رہم تیار  
آفس سیکریٹری  
رحمن اللہ

کاپی برائے

- (1) سیکریٹری نو گورنر
- (2) DHO میرانشاہ
- (3) MS میرانشاہ، ہسپتال
- (4) ڈائریکٹر جنرل ہیلتھ KPK
- (5) گورنر KPK
- (6) سیکریٹری ہیلتھ KPK
- (7) ڈپٹی کمشنر NWTD
- (8) سب ڈائریکٹر NWTD
- (9) DPO Police NWTD
- (10) ڈسٹرکٹ مینجریک افسر NWTD
- (11) صوبائی صدر پیرامیڈیکس
- (12) CFC سنٹر
- (13) پریس کلب میرانشاہ۔
- (14) آفس کاپی

ملک فرمان اللہ  
جنرل سیکریٹری پیرامیڈیکس  
ملک فرمان اللہ

صوفیہ 2 نومبر 2021

روزنامہ

پاکستان

12

26 32 18.2021 2 1443

**نوٹس غیر حاضری**

ڈسٹرکٹ ہیلتھ آفیسر ہارنہ وزیرستان کے زیر صیانت مندرجہ ذیل (LHV) لیڈی ہیلتھ وارڈ ہارنہ میں روزانہ صبح 10 بجے سے 12 بجے تک طبی مشورے اور طبی نوٹس کے لیے حاضر ہیں۔ یہ نوٹس ہفت روزہ کی بنیاد پر ہوں گے۔ ہر ماہ کے 15 ویں اور 30 ویں دن طبی نوٹس کے دفتر میں پیش ہونے والی اپنی ذہنی نوٹس پر حاضر ہو جائیں بصورت دیگر طبی نوٹس کے دفتر میں لائی جائے گی اور طبی نوٹس کے دفتر میں سے برخواست کیا جائیگا۔

(1) نائیک (2) آسیہ (3) ایلہ پروین (4) سینا سلطانہ (5) ریحانہ (6) قصور بیگم (7) کٹیوم (8) ہوسینا (9) شمس بہت (10) سہیلہ بیگم (11) شامزادہ (12) جمیلا (13) خالدہ بیگم (14) رازیہ خالدہ (15) نوشیما بی (16) رشیما پروین (17) کریمت نورین (18) بلکت بیگم (19) آریا شاد (20) شادہ آسم (21) نوشہ اختر (22) وسیم طاہر (23) سائما امیرین (24) مال تاج (25) شاکتہ جاہن (26) سفیرہ بی بی

One Fair, Quality Price For Patients

Tax special card of special persons

INF(P)5472/2021

ڈسٹرکٹ ہیلتھ آفیسر  
DHO ہارنہ وزیرستان

www.thyberpakhunkhwa.gov.pk

OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WESTERN  
INDIA



DISTRICT HEALTH OFFICER  
NORTH WESTERN  
INDIA

DISTRICT HEALTH OFFICER  
NORTH WESTERN  
INDIA

Sl. No.	Name	Age	Sex	Religion	Address	Remarks
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						

OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WESTERN  
INDIA



School Vaccination

20



Best copy



21

To,

The District Account Officer,  
North Waziristan Miranshahi.

Subject: **REQUEST FOR OMITTING FROM SALARY STOPPAGE LIST.**

Memo:

The following EPI Technicians have been adjusted by the then DHO NW 1D in compliance to letter of Directorate of Health services, KPK and Peshawar No.12242-48/DHS/Admin dated 04/06/2020 attached Annex-A. in light of the court decision attached as Annex-B.

S#	Name	Designation	Personal No	Remarks
1	Mr.Farmanullah	EPI Technician	00960683	
2	Mr.Nizamud Din	--do--	00962540	
3	Mr.Nasirullah	--do--	00962559	
4	Mr.Muhammad Idress	--do--	00962769	
5	Mr.Burhanullah	--do--	00962773	
6	Mr.Syed Midrarullah	--do--	00951408	
7	Mr.Inamullah	--do--	00943058	
8	Mr.Khushdil Khan	--do--	00943060	
9	Mr.Ali Mar Khan	--do--	00943061	
10	Mr.Yousaf Khan	--do--	00943062	
11	Mr.Asadullah	--do--	00976961	
12	Mr.Shaheenullah	--do--	00943164	
13	<b>Mr.Habib Shah</b>	--do--	<b>00946722</b>	<b>Please direct Dr.Hafizullah DHO NW1 to justify that which court has passed order in their favour.</b>
14	<b>Mr.Haji Rehman</b>	--do--	<b>00946726</b>	
15	<b>Mr.Imdadullah</b>	--do--	<b>00943059</b>	

It is therefore requested that the above mentioned names may be taken out of source II form and their salaries may be continued please.

District Health Officer,  
North Waziristan TD

No.13313-15/DHO dated 23/08/2021.

Copy forwarded to  
Director General Health Services KPK Peshawar.  
Deputy Commissioner, North Waziristan TD.  
Officials concerned.

District Health Officer,  
North Waziristan TD

*Better copy-*

(S)

22

To:

1. Dr. Muhammad Adnan Khan MO Type-D Hospital R. Miranshah.
2. Dr. Jamshid Nawaz MO - do
3. Dr. Abidullah MO - do
4. Mr. Waliullah QTA - do
5. Mr. Habib Shah EPI Technician - do
6. Mr. Attaur Rehman Dental Technician - do
7. Mst. Sania Bibi LHV - do
8. Mr. Zohib Storekeeper - do

Subject: SHOW CAUSE NOTICE.

Memo:

Whereas you all have been reported as willfully absent from your duty station from unknown duration.

Whereas you all have been reported absent without any prior permission of the undersigned.

Whereas it shows that you are not performing duties regularly which is due to negligence on your part.

In view of the above you all are directed to report to your duty stations with immediate effect.

Consequent upon the above you all are hereby directed to show cause of absenteeism in written and reach this office within 02 days positively. In case you failed to report to your duty station and failed to justify your position, strict disciplinary action will be initiated against you **which may lead to removal / termination from service.**

**District Health Officer,  
North Waziristan at Miranshah**

No.13355-63/Show cause notice.

Copy forwarded to the:

*dated 25/8/2021*

1. Director General Health Services KP Peshawar.
2. Deputy Commissioner, Tribal District Miranshah.
3. Assistant Commissioner Sub Division Razmak.
4. PS to Secretary Health KPK, Peshawar.
5. HRMIS Focal Person of this office.
6. DMO, IMU, Health Department.
7. Head Clerk of this office with the direction to stop their salaries till further orders.
8. Official concerned.

**District Health Officer,  
North Waziristan at Miranshah**



Scanned with CamScanner

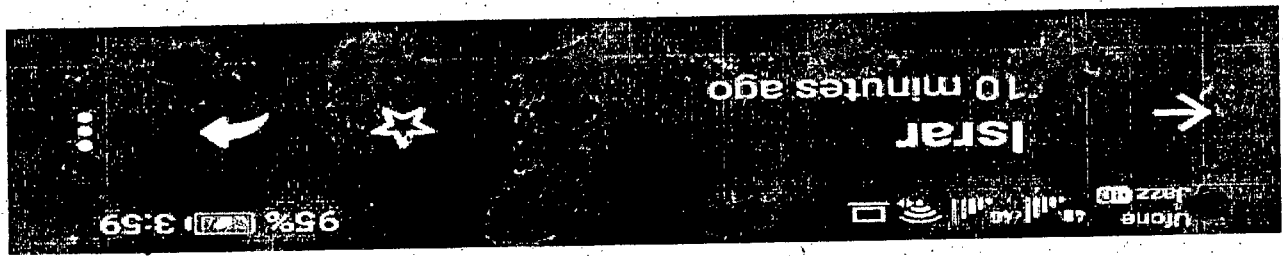
OFFICE OF THE DISTRICT ATTORNEY  
NORTH WASHINGTON

Official continued  
HEAD CLERK of this office with direction to stop their duties till further orders  
INVESTIGATION OF THE DEPARTMENT OF JUSTICE  
The following information was received from the  
STATE OF NORTH CAROLINA  
ON 10/10/2018

OFFICE OF THE DISTRICT ATTORNEY  
NORTH WASHINGTON

When a person is arrested, the arresting officer is required to advise the person of their rights. If the person is unable to understand the rights, the officer must provide an interpreter. The person must be given the opportunity to stop the questioning at any time. If the person is arrested, the officer must advise the person of their rights. If the person is unable to understand the rights, the officer must provide an interpreter. The person must be given the opportunity to stop the questioning at any time. If the person is arrested, the officer must advise the person of their rights. If the person is unable to understand the rights, the officer must provide an interpreter. The person must be given the opportunity to stop the questioning at any time.

OFFICE OF THE DISTRICT ATTORNEY  
NORTH WASHINGTON



Handwritten marks: '73' and a circled 'S'.







**OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN**  
Tel: (0928) 300788 FAX: (0928) 311662 E-mail: agency.surgeon@wa19@gmail.com  
DHO Office Dated: / / 2021

1. Dr. Muhammad Adnan Khan MO Type-D Hospital Razmak
2. Dr. Jamshid Nawaz MO -do-
3. Dr. Abid Ullah MO -do-
4. Mr. Wali Ullah O/TA -do-
5. Mr. Mr Habib Shah EPI Technician -do-
6. Mr. Atm Ur Rehman Dental Technician -do-
7. Mst. Samia Bibi LHV -do-
8. Mr Zohaib Storekeeper -do-

Subject:  
Memo:

**SHOW CAUSE NOTICE.**

Whereas you all have been reported as wilfully absent from your duty station from unknown duration.  
Whereas you all have been reported absent without any prior permission of the undersigned.  
Whereas it shows that you are not performing duties regularly which is equivalent to negligence on your part.  
In view of the above, you all are directed to report to your duty stations with immediate effect.  
Consequent upon the above, you all are hereby directed to show cause of absenteeism in written and reach this office within 02 days positively. In case you failed to report to your duty station and failed to justify your position, strict disciplinary action will be initiated against you which may lead to removal/termination from service.

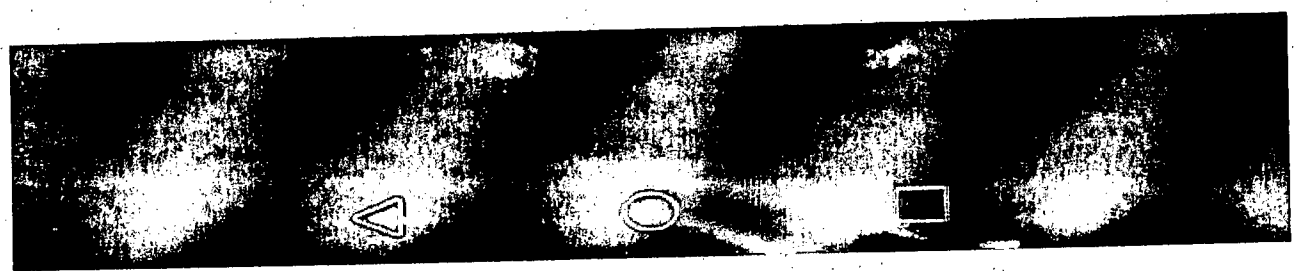
**DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN AT MIRANSIYAH**

No. 13355-63

Show Cause Notice  
Copy forwarded to the:

- 1- Director General Health Services KP Peshawar.
- 2- Deputy Commissioner Tribal District Miransiyah.
- 3- Assistant Commissioner Sub Division Razmak.
- 4- PS to Secretary Health, KPK, Peshawar.
- 5- HRMS Focal Person of this office.
- 6- DMO, IMU, Health Department.
- 7- Head Clerk of this office with direction to stop their salaries till further orders.
- 8- Official concerned.

*[Signature]*  
**DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN AT MIRANSIYAH**





OFFICE OF THE DISTRICT HEALTH OFFICER  
DISTRICT NORTH WAZIRISTAN

Tel: (0928) 300788 FAX: (0928) 311662 Email: agency surgeon nwa19@gmail.com

**OFFICE ORDER: -**

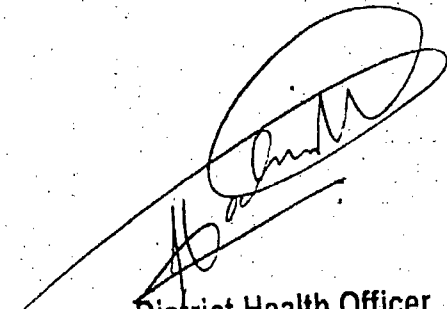
In partial modification to this office letter No.13347-54/DHO Office dated 25.08.2021, the officers from serial No.1 to 3 are liable to be report at their duty stations and also bound to submit their written replies to the show cause with in stipulated time, while the remaining officials from serial No.4 to 8 are exempted due to their termination vide this office letter bearing endost: No.13024/DHO NWTD dated 06.08.2021, as they are not employees presently of Health Department District North Waziristan and their names in the show cause letter under reference above was included due to clerical mistake.

SD/xxxxx  
District Health Officer  
North Waziristan

No. 13408-16 /DHO Office NWTD  
Copy to the:-

dated 25 / 8 / 2021.

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner District North Waziristan.
3. Assistant Commissioner sub Division Razmak.
4. PS to Secretary Govt: of KP Health Department Peshawar.
5. HRMS Focal Person of this office.
6. DMO, IMU, Health Department.
7. Head Clerk of this office.
8. Officers / Officials individual concerned.
9. Office Notice Board.

  
District Health Officer  
North Waziristan



OFFICE OF THE DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN

Tel: (09281) 300788 FAX: (09281) 311662 Email: aghs.surgemw@td2019@gmail.com

No. 601 /DHO/COVID-MKN Dated the 25 /09/2021

To: The District Education Officer,  
District North Waziristan, Miranshah.

Subject: **COVID-19 VACCINATION OF INDIVIDUALS OF AGE 15 TO 18 years**  
Reference your letter No. Z4811-45/DEO/NWTD Dated: 20/09/2021, following is the schedule of school vaccination for COVID-19 wherein *Pfizer vaccine* will be administered to all students **15 to 18 years of age**.

Sr.#	EMIS Code	Name of School	Tehsil	No. of Students having 15 to 18 years of age	Date of Vaccination	Mobile Team
01		GHS Saddak	Mirali	57	27 Sep. 2021	Dr. Farzeel Ullah Mr. Saifdar Elahi Mr. Habib Shah Mr. Islam Ullah
02	65025	GHS Muhammad Khalil	Datta khel	11	27 Sep. 2021	Dr. Naseem Mr. Arif Ullah Mr. Jawah Khan Dr. Jamal Shah
03	54521	GHS Dossali	Dossali	19	28 Sep. 2021	Mr. M. Yunas Mr. Samaulah
04	64522	GHS Pir Sahib Jan Kot	Dossali	20	28 Sep. 2021	---
05	64415	GHS Huqmay	Mir Ali	12	27 Sep. 2021	Dr. Muhammad Efta Mr. Saif Ayub Mr. Yusuf Khan
06	64412	GHS Haider khel	Mir Ali	6	27 Sep. 2021	---
07	64116	GHS Tappl	Miran Shah	10	27 Sep. 2021	Dr. Masorrat Mr. Tariq Mr. Idrees
08	63878	GHS Siddiqi Kot	Shewa	13	20 Sep. 2021	Dr. Ikram Ullah Mr. Ihsan Ullah

It is requested that the Principals of the above mentioned Schools may be directed to convey message to all students to bring their Form-B with them so that proper registration may be carried out for further Data entry as per SOPs.

DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN 25/9/21

No. \_\_\_\_\_ /DHO/COVID/MKN  
Copy forwarded to the:

Dated the \_\_\_\_\_ /09/2021

- Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- Director EPI, DGHS, Khyber Pakhtunkhwa, Peshawar.
- Deputy Commissioner, North Waziristan, Miranshah.
- HQ-7 DIV, Miranshah Cantt, North Waziristan.
- Additional Deputy Commissioner, North Waziristan, Miranshah.
- PS to Secretary Health, KPIC, Peshawar.

DISTRICT HEALTH OFFICER  
NORTH WAZIRISTAN



OFFICE OF THE DISTRICT HEALTH OFFICER

27

1	00923792 MISS JABEENA	CNIC: 2150686929180	Desig: (99999999) Grade: 04 N
2	00923795 ARSALA JAN	CNIC: 2150597564661	Desig: CHOWKIDAR (80952180) Grade
3	00923896 MUHAMMAD ANWAR	CNIC: 2150472903193	Desig: CHOWKIDAR (81065998)
4	00924012 MUDASSIR AHMAD	CNIC: 2150565689245	Desig: DRIVER (80952662) Grad
5	00926686 HAFIZ WAQAS AHMAD	CNIC: 2150513327445	Desig: CLINICAL TECHNICIAN (810660)
6	00926746 MISS SAIMA	CNIC: 2150564741896	Desig: LADY HEALTH WORKER (80952898) (
7	00927655 MUHAMMAD FAROOQ	CNIC: 2150542797451	Desig: ASSISTANT ANESTHETIS(8103
8	00927731 RIAZ ULLAH	CNIC: 2150554939937	Desig: SENIOR CLINICAL TECH(80953249) Gr
9	00928500 FARMAN ULLAH	CNIC: 2150968868251	Desig: CHOWKIDAR (80952186) Gr
10	00928659 HIZB ULLAH	CNIC: 2150584965329	Desig: CHOWKIDAR (80952191) Grade
11	00928737 AZAZ IQBAL	CNIC: 2150556740237	Desig: MEDICAL TECHNICIAN (81066178) Gr
12	00929279 ADNAN ZAFAR	CNIC: 2150950182053	Desig: CHOWKIDAR (81065983) Grad
13	00929688 MST BRASHANA	CNIC: 1610174370424	Desig: LADY HEALTH WORKER (80952895
14	00930902 TAHIR IQBAL	CNIC: 2150562979219	Desig: DISPENSOR (80952494) Grade:
15	00930910 MUHAMMAD ABDULLAH	CNIC: 2150537205127	Desig: JUNIOR EPI TECHNICIA(8095
16	00930923 ZOHAIB KHAN	CNIC: 2150607174333	Desig: STORE KEEPER (80953277) Grad
17	00934976 ZABIH ULLAH	CNIC: 2150510131517	Desig: CHARGE NURSE (80952153) Grad
18	00934977 GHOFRAN ULLAH	CNIC: 2150564235819	Desig: CHARGE NURSE (80952160) G
19	00934978 MUKHTAR AYUB	CNIC: 2150575819485	Desig: (99999999) Grade: 12
20	00934979 MASOOD AHMED	CNIC: 2150552028357	Desig: CHARGE NURSE (80952149) .
21	00934982 HUSSAIN AHMAD	CNIC: 2150562725630	Desig: CHARGE NURSE (80952165). C
22	00934984 HIKMAT ULLAH	CNIC: 2150618796477	Desig: CLINICAL TECHNICIAN (81066019) (
23	00934985 MST ZAINAB	CNIC: 2150577023352	Desig: CHARGE NURSE (80952158) Grad
24	00935425 ZAHID NOOR	CNIC: 2150676703435	Desig: CHARGE NURSE (80952157) Gra
25	00935426 TASLEEM ULLAH	CNIC: 2150579831843	Desig: CHARGE NURSE (80952161) Gr
26	00935428 NOOR UL AMIN	CNIC: 2150531829765	Desig: CHARGE NURSE (80952156) Gr
27	00935431 HASEB ULLAH	CNIC: 2150509653375	Desig: CHARGE NURSE (80952159) Gra
28	00936311 AZHAR UD DIN	CNIC: 2150549096392	Desig: CHARGE NURSE (80952163) Gra
29	00936312 ZAHIR UD DIN	CNIC: 2150655400393	Desig: CHARGE NURSE (80952162) Grad
30	00941490 SHAHID AMIN	CNIC: 2150964790965	Desig: BEHISHTI/SWEEPER (80951905) G
31	00946549 ISMAIL KHAN	CNIC: 1530251346431	Desig: (99999999) Grade: 16 NT
32	00946551 GUL ZAMAN KHAN	CNIC: 1570279006337	Desig: (99999999) Grade: 16
33	00946727 FAZAL QADIR	CNIC: 2150538909465	Desig: BEARER (80951900) Grade: 0
34	00960678 SHAZIA	CNIC: 2150910881352	Desig: DAI (81066077) Grade: 04 NTN
35	00962769 MUHAMMAD IDRESS	CNIC: 2150663051679	Desig: EPI TECHNICIAN (81066113)
36	00962773 BURHAN ULLAH	CNIC: 2150577740989	Desig: EPI TECHNICIAN (81066110) Gra
37	00965772 KHAN BAD ULLAH	CNIC: 2150152079135	Desig: DISPENSOR (80952631) Grad
38	00967083 IHTERAM KHAN	CNIC: 2150555040183	Desig: WARD ORDERLI (80953698) Gr
39	00967086 HAZRAT ANAS	CNIC: 2150538896387	Desig: WARD ORDERLI (80953739) Gra
40	00967087 AQRAR AHMAD	CNIC: 2150588979201	Desig: WARD ORDERLY (81066248) G
41	00967088 MUHAMMAD YASIR	CNIC: 2150531524977	Desig: WARD ORDERLY (81066249)
42	00970253 NASIB ULLAH	CNIC: 2150612853767	Desig: WARD ORDERLI (80953774) Grad
43	975339 Taiibullah		Sweeper
44	975338 Ajma Yata		Dai
45	975337 Shabirullah		Dispenser
46	979347 Asif Mehmood		Dispenser
47	978273 Manzoor Khan		Dispenser

فیشن مہر

## 6101 ADMINISTRATION

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2019-2020	2020-2021	2019-2020	2019-2020	2020-2021
			Rs	Rs	Rs
07 HEALTH					
076 HEALTH ADMINISTRATION					
0761 ADMINISTRATION					
076101 ADMINISTRATION					
MW6006 DHO Health North Waziristan					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			<u>1,019,910,000</u>	<u>1,029,357,998</u>	<u>1,000,800,000</u>
A011 TOTAL PAY	1969	1969	<u>526,107,000</u>	<u>497,101,340</u>	<u>526,215,970</u>
A011-1 TOTAL PAY OF OFFICERS	112	112	<u>45,383,000</u>	<u>32,794,570</u>	<u>45,485,460</u>
A01101 Total Basic Pay Of Officer	112	112	<u>45,383,000</u>	<u>32,696,990</u>	<u>45,383,000</u>
D086 District Health Officer (BPS-18)	1	1	942,000		942,000
D312 Deputy District Health Officer (BPS-18)	1	1	873,000		873,000
D342 District Specialist (BPS-18)	7	7	5,977,000		5,977,000
S213 Senior Medical Officer (BPS-18)	8	8	7,573,000		7,573,000
S264 Senior Women Medical Officer (BPS-18)	1	1	798,000		798,000
F191 Field Supervisor (BPS-17)	1	1	482,000		482,000
H032 Head Nurse (BPS-17)	1	1	668,000		668,000
M033 Medical Officer (BPS-17)	54	54	15,679,000		15,679,000
S213 Senior Medical Officer (BPS-17)	8	8	3,667,000		3,667,000
W023 Woman Medical Officer (BPS-17)	2	2	784,000		784,000
C028 Charge Nurse (BPS-16)	26	26	6,918,000		6,918,000
C067 Clinical Pathologist (BPS-16)	1	1	511,000		511,000
C082 Computer Operator (BPS-16)	1	1	511,000		511,000
A01102 Personal pay				97,580	102,460
A011-2 TOTAL PAY OF OTHER STAFF	1857	1857	<u>480,724,000</u>	<u>464,306,770</u>	<u>480,730,510</u>
A01151 Total Basic Pay Other Staff	1857	1857	<u>480,724,000</u>	<u>464,300,260</u>	<u>480,724,000</u>
S035 Senior Clerk (BPS-14)	4	4	1,375,000		1,375,000
A154 Assistant Vaccination Superintendent (BPS-12)	1	1	206,000		206,000
B001 B.C.G. Technician (BPS-12)	2	2	802,000		802,000


29

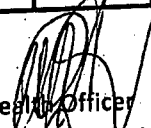
**OFFICE OF THE DISTRICT HEALTH OFFICER MIRANSHAH**  
**Sanctioned, Filled, Vacant, Position, (Temporory/Permenent ) Staff.**

S.No	Nomenclature of the post with Grade	BPS	Permenent	Temporary	Sanc	Filled	Vacant
1	Agency Surgeon	18	1	0	1	1	0
2	ADHO	18	1	0	1	1	0
3	Specialist	18	0	7	7	7	0
4	Senior Medical Officer	18	3	5	8	8	0
5	T.B.Control Officer	18	1	0	1	1	0
6	Senior Woman Medical Officer	18	1	0	1	1	0
7	FSMO (EPI)	17	0	1	1	1	0
8	WMOs	17	0	2	2	1	1
9	Medical Officers	17	13	41	54	33	21
10	Dental Surgeon	17	2	6	8	6	2
11	Head Nurse	17	0	1	1	0	1
12	Computer Operator	16	0	1	1	1	0
13	Charge Nurse	16	1	25	26	6	20
14	DSV	12	0	1	1	1	0
15	BCG, Technication	12	0	2	2	2	0
16	LHV	12	2	147	149	149	0
17	Dispenser/Pharmacy Tech:	12	42	196	238	238	0
18	MT/FMT	12	4	44	48	48	0
19	Dental Tech:	12	4	5	9	9	0
20	Anesthesia Technication	12	0	4	4	4	0
21	Labouratory Technication	12	0	3	3	3	0
22	OT Technicaion	12	0	3	3	3	0
23	X-Ray Technication	12	0	3	3	3	0
24	ECG Technication	12	0	3	3	3	0
25	Sterilization Technication	12	0	1	1	1	0
26	Blood Bank Technicain	12	0	1	1	1	0
27	Senior Clerk	14	2	2	4	4	0
28	TSV,	12	0	1	1	1	0
29	FSV	12	0	2	2	2	0
30	OT, Assistanant	12	1	5	6	6	0
31	Radio Grapher	12	1	8	9	9	0
32	Anesthesia Assistanant	12	0	2	2	2	0
33	Senior EPI Technication	12	0	9	9	9	0
34	Junior EPI Technication	12	0	29	29	29	0
35	Midwife	12	0	21	21	21	0
36	Laby: Asstt:	12	2	7	9	9	0
37	Store Keeper	12	0	2	2	2	0
38	Electrication	7	0	5	5	5	0
39	Tube Well Operator	6	0	2	2	2	0
40	Junior Clerk	11	3	5	8	8	0
41	Sanitary Inspector	12	1	0	1	1	0
42	Sanitary Supervisor	12	2	1	3	3	0
43	Vaccinator	12	7	0	7	7	0
44	ASV	12	1	0	1	1	0
45	X-Ray Attendanant	5	0	4	4	4	0
46	Fiter Mistary	7	1	0	1	1	0
47	Drivers	6	2	6	8	8	0
48	O.T.Attendt:	5	3	9	12	12	0
49	Ward Orderli /Ward Attendent	4	59	156	215	215	0
50	Dai /Ward Aya	4	13	274	287	287	0
51	Badraga	4	5	0	5	5	0
52	Gate Keener	4	1	0	0	0	0

✓ 30  
/

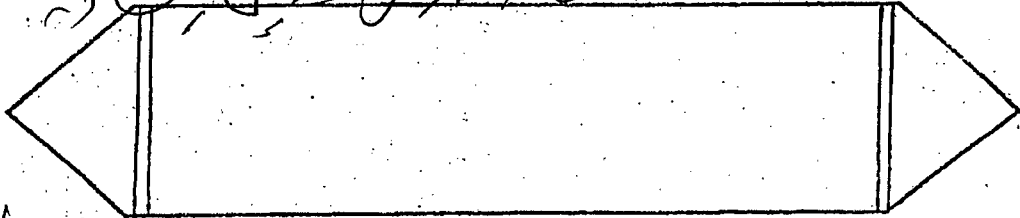
53	Dhobi	4	2	2	4	4	0
54	Mali	4	0	5	5	5	0
55	Bearer	4	0	2	2	2	0
56	Laboratory Attendant	5	0	5	5	5	0
57	Sweeper/Mali	3	44	22	66	66	0
58	Naib Qasid	3	6	38	44	44	0
59	Behshi/Sweeper	3	42	266	308	308	0
60	Chowkidar	3	39	268	307	307	0
61	Sanitary Petrol	3	7	0	7	7	0
62	Cleaner	3	2	0	2	2	0
63	Cooks	4	7	0	7	7	0
	National Programme F/P	0	0	0	0	0	0
1	Account Supervisor	7	0	1	1	1	0
2	Lead Health Supervisor	7	0	1	1	1	0
3	Lead Health Worker	5	0	196	196	196	0
4	Drivers	5	0	2	2	2	0
	Total		328	1860	2188	2143	45

  
Agency Account Officer  
N.W.A. Murat Shah

  
District Health Officer  
North Waziristan Tribal District  
District Health Officer  
Muzaffargarh Tribal District

24/4/2020

## بعد الت کر دس نڈ بیوئل ڈی ایشاؤ



2022ء پنجاب ریسیٹرنٹ نمبر 5

ڈاکٹر ضیاء اللہ بنام حکومت

موزخہ

مقدمہ

دعویٰ

جرم

### باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
 آن مقام کیلیے سید خالد و سید ارمین  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زنداں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخ  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ  
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے وہ ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند ہے۔

Respondent No. 5

المرقوم 16 مارچ 2022ء

واہ العباد

کے لئے منظور ہے۔

بمقام



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESAWAR**

**APPEAL NO.912/2022**

**HAFEEZ ULLAH**

**VS**

**GOVT: OF KPK**

**REPLY ON BEHALF OF RESPONDENT No.4 (Dr. Gulistan Khan) IN RESPONSE TO THE APPLICATION SUBMITTED BY APPELLANT FOR THE GRANT OF STATUS QUO**

**R/SHEWETH:**

- 1- That the above mentioned appeal is pending for adjudication before this august Service Tribunal and is fixed for 1.7.2022.
- 2- That this august Tribunal has issued a status quo order on 15.6.2022 in the above noted appeal.
- 3- That the appellant cannot satisfy all the three necessary ingredients under order 39 rule 1 and 2 which is must according to the Supreme Court judgments.
- 4- That as the transfer order has been passed by a proper Government authority; therefor under 56 (d) of Specific Relief Act such orders can not be stayed/suspended.
- 5- That if the stay order dated 15.6.2022 is vacated then the appellant will not suffer irreparable loss.
- 6- That under order 39, rule 2A stay cannot be granted for more than fifteen days.
- 7- That no prior notice of the stay application was given which is also mandatory under section 80 of the Civil Procedure Code 1908.

It is therefore most humbly prayed that on acceptance of this application the stay order issued on 15.6.2022 may very kindly be vacated/set aside.



**RESPONDENT NO.4**

*[Signature]*  
**Dr. Gulistan Khan**

**THROUGH:**  
*[Signature]*  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

**BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR**

In Re: Service Appeal No 912 /2022


Dr. Hafiz Ullah

**VERSUS**

Govt of KPK through Chief Secretary and others

**AFFIDAVIT**

I, Gulistan Khan District Health Officer, North Waziristan; do hereby solemnly affirm and declare on oath that all the contents of accompanying Reply are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Tribunal.

  
DEPONENT  
Dr. Gulistan

