

05th July, 2022

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional AG for official respondents present.

Respondents have not submitted written reply/comments. Learned AAG seeks time for submission of written reply/comments. Last chance is given for submission of written reply/comments. To come up for written reply/comments on 07.09.2022 before S.B.



(Kalim Arshad Khan)
Chairman

20.12.2021 Appellant present through counsel.

Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 07/03/2022 before S.B.

Appellant Deposited
Security & Process Fee

29/12

(Rozina Rehman)
Member (J)

7-3-2022

Due to retirement of the Honorable chairman the case is adjourned to come up for the same as before on 24-5-2022 @ Reader

24.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Previous date was changed on the strength of Reader note, therefore notice be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 05.07.2022 before S.B.



(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7595 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/10/2021	<p>The appeal of Mst. Rahat-ul-Ain resubmitted today by Mr. Saadullah Khan Marwat 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>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>20/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Rahat-ul-Amin Charge Nurse Govt. Liaqat Memorial Hospital Kohat received today i.e. on 24.09.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Memorandum of appeal is unsigned.
- 4- Appeal may be supported with by an affidavit duly attested by the Oath Commissioner.
- 5- Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
- 6- Annexures of the appeal may be attested.
- 7- Wakalat nama in favour of appellant be placed on file.
- 8- Appeal may be annexed serial wise as mentioned in the memo of appeal.
- 9- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1905 /S.T,

Dt. 24/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saadullah Khan Marwat Adv. Pesh.

Sir,

Re-submitted after receiving the
objections.



BEFORE THE KPK SERVICE TRIBUNAL PESHAWARS.A. No. 7595 / 2021

Rahat-ul-Ain

versus

Secretary & Others.

I N D E X

S. No.	Documents	Annex	P. No.
1.	Memo of Appeal		1-4
2.	Transfer to LRH dated 17-08-2015	"A"	5
3.	Appeal No. 1773/15 dated 09-12-15	"B"	6-8
4.	Order of status quo dated 05-01-16	"C"	9
5.	Withdrawal of Transfer Order dated 09-01-2017	"D"	10
6.	Withdrawal of Appeal dated 08-10-2018	"E"	11
7.	Transfer to Women & Children Hospital Kohat dated 15-10-2018	"F"	12
8.	Departmental Appeal / Reminder dated 23-02-2021 / 31-08-2021	"G"	13-15

Appellant

Through



Saadullah Khan Marwat
 Advocate
 21-A, Nasir Mansion,
 Shoba Bazaar, Peshawar
 Ph: 0311-9266609

Dated: 13-09-2021

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. _____/2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7633

Dated 24/9/2021

Mst. Rahat-ul-Ain,
Charge Nurse,
Govt. Liaqat Memorial
Hospital, Kohat Appellant

VERSUS

1. Director General,
Health Services,
KP, Peshawar.
2. Secretary, Govt. of
KP, Health Department,
Peshawar.
3. Medical Superintendent,
Govt. Naseerullah Khan Babar,
Memorial Hospital Kohat Road,
Peshawar. Respondents

24/9/2021
Registrar

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT,
1974 FOR PAYMENT OF MONTHLY SALARIES
WITHHELD SINCE 17-08-2015 TILL 01-02-2018:**

Respectfully Sheweth:

1. That at the time, appellant was serving the Hospital, Govt. Nasir Ullah Khan Baber, Memorial Hospital, Kohat Road Peshawar as Charge Nurse.

2. That the then Medical Superintendent, namely Shoukat Jamal transferred appellant during ban period from Govt. Nasir Ullah Khan Baber, Memorial Hospital Peshawar to Govt. LRH Peshawar on 17-08-2015 for no legal reason but refused to surrender to his ill wishes, despite the fact that no vacancy was lying vacant there in the Lady Reading Hospital. (Copy as annex "A")
3. That appellant reported to LRH for duty but her arrival report returned to her having no such vacant post, so reported back for performance her official duties at Govt. Naseerullah Khan Babar Memorial Hospital, Kohat Road. Her monthly salary was stopped since 17-08-2015, yet current monthly salaries were released to her after 01-02-2018.
4. That on 09-12-2015, appellant filed S. A. No. 1373/15 before this hon'ble Service Tribunal for setting aside transfer order and then on 05-01-2016, stay was granted in her favor and was then performing her official duties in the Govt. Naseerullah Khan Baber Memorial Hospital Kohat Road. (Copies as annex "B" & "C")
5. That the then MS of the hospital was not implementing stay order, so appellant submitted COC for compliance of the said order and then transfer order dated 17-08-2015 was withdrawn by R. No. 01 successor of former MS on 09-01-2017, meaning thereby that appellant shall perform her duties in the said hospital at Kohat Road. (Copy as annex "D")
6. That on 08-10-2018, Appeal against transferred order was withdrawn from the Hon'ble Tribunal. (Copy as Annex "E")
7. That on 15-10-2018, R. No. 01 again transferred her to Women and Children hospital, Kohat. Appellant then reported for duty to Kohat Hospital. (Copy as annex "F")
8. That on 23-02-2021, appellant submitted departmental appeals before the authority for release of the withheld salaries, followed by reminder dated 31-08-2021 which met dead response till date. (Copy as annex "G")

Hence this appeals, inter alia, on the following grounds.

GROUND S:

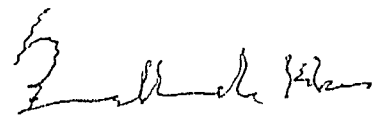
- a. That since the posting of appellant at Govt. Naseerullah Khan Babar Memorial Hospital Kohat Road, Peshawar served the Hospital to the best of her ability and with devotion.
- b. That due to ill will of the then MS of the said Hospital, appellant was transferred on 17-08-2015 to Lady Reading Hospital Peshawar but no such post was lying vacant their which fact was brought in to the knowledge of the respondents, yet since 17-08-2015, her monthly salaries were not released.
- c. That appellant requested respondents time and again verbally and in writing to release the withheld salaries but no heed was paid to her request, rather transferred to Children and Women Hospital Kohat.
- d. That holding monthly salaries of appellant since 17-08-2015 till 01-02-2018 was based on malafide of the respondents.

It is, therefore, most humbly prayed that on acceptance of the appeal, withheld salaries since 17-08-2015 till 01-02-2018 be released to appellant with all consequential relief, with such other relief as may be deemed proper and just in circumstances of the case.



Appellant

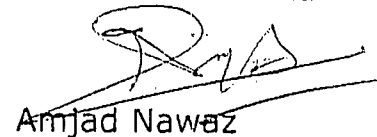
Through



Saadullah Khan Marwat



Arbab Saiful Kamal



Amjad Nawaz

Advocates

Dated: 13-09-2021

AFFIDAVIT

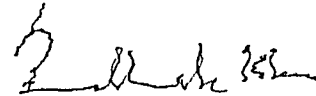
I, Mst. Rahat-ul-Ain, Khan, Charge Nurse, Govt. Liaqat Memorial Hospital, Kohat, do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief



DEPONENT

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal for release of the monthly salaries but for transfer from one Hospital to other.

**ADVOCATE**

**DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.**

OFFICE ORDER.

Mrs. Rahat-Ul-Ain D/O Gulzar Khan, Charge Nurse BPS-16 Govt. Naseerullah Khan Babar Memorial Hospital, Kohat Road Peshawar is hereby transferred and posted in LRH Peshawar against the vacant post of Charge Nurse, in the interest of Public Service with immediate effect.

NB:- Arrival / Departure reports should please be submitted to this Directorate for records.

Sd/-

**DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.**

Endst No. 43-46b/E.II,

Dated Pesh. The 17-08-2015.

Copy forwarded to the:-

1. Deputy Medical Superintendent (Admin) MTI LRH Peshawar.
2. Medical Supdt. Govt. Naseerullah Khan Babar Memorial Hospital, Kohat Road, Peshawar w/r to his Endst. No. 6007/GNKBMH, dated 25-07-2015.
3. AG Khyber Pakhtunkhwa Peshawar.
4. DA concerned DGHS office Peshawar.

For Information and necessary action.

Sd/-

**DEPUTY DIRECTOR (NURSING)
DIRECTORATE GENERAL HEALTH
SERVICES, KPK, PESHAWAR.**

A

5

GOVERNMENT OF KHYBER PAKHTUNKHWA
MINISTRY OF HEALTH
PESHAWAR

**DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.
E-Mail Address: mg@ghs.gov.pk
GPO No: 021-0210209
Fax: 021-0210107, 0210198

OFFICE ORDER

Mrs. Rahmat-ul-Ain D/O Gulzar Khan, Charge Nurse BPS-16 Govt. Naseerullah Khan Babar Memorial Hospital, Kohat Road Peshawar is hereby transferred and posted in LRH Peshawar against the vacant post of Charge Nurse, in the interest of public service with immediate effect.

NB: - Arrival/Departure reports should please be submitted to this Directorate for records.

Sd/-
DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR.

Handwritten notes:
Sd/- S.P.S. KP
Minister Health
Khyber Pakhtunkhwa
Peshawar

Dated Pesh. The 17/8/2015.

Forwarded to the:-

- 01- Deputy Medical Superintendent (Admin) M17/ LRH Peshawar.
- 02- Medical Supdt. Govt. Naseerullah Khan Babar Memorial Hospital, Kohat Road Peshawar w/ to his Endst. No. 6707/GNKBMH, dated 25-07-2015.
- 03- AG Khyber Pakhtunkhwa Peshawar.
- 04- DA concerned DGHS office Peshawar.

For information and necessary action.

Handwritten signature: Minister Health Khyber Pakhtunkhwa Peshawar

DEPUTY DIRECTOR (NURSING)
DIRECTORATE GENERAL HEALTH SERVICES, K.P.K PESHAWAR

GOVERNMENT
Minister of Labour & P.I.E.D
Khyber Pakhtunkhwa

Handwritten notes:
7/13/15
Minister Health
& relieve her immediately
20/8

17/8

Handwritten signature:
20/8

Attested
Handwritten signature

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 1373 /2015

IN THE
KPK SERVICE TRIBUNAL
Dated: 14/3/15
09-12-2015

Mst. Rahat-ul-Ain D/o Gulzar Khan,
Staff Nurse, Govt. Naseer Ullah Khan Babar
Memorial Hospital, Kohat Road, Peshawar. Appellant

Versus

- 1. Director General, Health Services,
KP, Peshawar.
- 2. Secretary, Govt. of KP,
Health Department, Peshawar. Respondents

⇔ <=> ⇔ <=> ⇔ <=> ⇔ <=> ⇔

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT 1974, AGAINST OFFICE ORDER NO. 5143-46/E-II, DATED 17.08.2015 ISSUED ON 20.08.2015 OF R. NO. 1 WHEREBY APPELLANT WAS TRANSFERRED FROM GOVT. NASEER ULLAH KHAN BABAR, MEMORIAL HOSPITAL, KOHAT ROAD, PESHAWAR AND POSTED IN LRH, PESHAWAR AGAINST THE VACANT POST OF CHARGE NURSE FOR NO LEGAL REASON.

Filed to-
Registrar
9/12/15

⇔ <=> ⇔ <=> ⇔ <=> ⇔ <=> ⇔

Respectfully Sheweth:

- 1. That appellant was initially appointed as Nurse in October 2008 and was posted at BHU Hospital KDA, Kohat. Thereafter, she was transferred to City Hospital, Lakki Marwat. Finally she was transferred from City Hospital Lakki Marwat to Govt. Naseer Ullah Khan Babar, Memorial Hospital, Kohat Road, Peshawar.

2. That beside the aforesaid transfer/posting, appellant remained as such for 2 years at Khyber Medical University, Peshawar.
3. That wherever appellant was posted, she performed her duty in the best interest of public and without any complaint.
4. That during service period, appellant completed 2 years course of BSc Nursing and also got admission in Master of Public Health (MPH).
5. That on 17.08.2015, appellant was transferred from Govt. Naseer Ullah Khan Babar, Memorial Hospital, Kohat Road, Peshawar to Lady Reading Hospital, Peshawar against the vacant post of Charge Nurse. The said order was endorsed on 20.08.2015. The post of appellant at Govt. Naseer Ullah Khan Babar, Memorial Hospital, Kohat Road, Peshawar is still lying vacant. (Copy as annex "A")
6. That on 18.08.2015, the Minister for Health Department imposed ban on transfers/postings.
7. That on 09.09.2015, appellant submitted representation before R. No. 2 which met dead response till date. (Copy as annex "B")

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

GROUND S:

- a. That since the year 2008, appellant performed duty at various Hospitals of the Province to the best of the ability and to the entire satisfaction of the superiors.
- b. That on 18.08.2015, ban was imposed on transfers/postings and in fact order of transfer of appellant was issued on 20.08.2015 as is evident from the same. By then, ban was imposed on posting and transfers.

- c. That the impugned order was made due to the ill wishes of the Medical Officer of the Hospital and at his Instance the Impugned order Issued by R. No. 1.
- d. That appellant is undergoing Master of Public Health (MPH) and has completed first semester successfully.
- e. That the impugned order is not in the interest of public service but was passed at the ill wishes and nefarious designs of Medical Superintendent of Govt. Naseer Ullah Khan Babar, Memorial Hospital, Kohat Road, Peshawar.
- f. That as per the verdict of the apex Court, illegal and malafide based orders should not be complied with by issuing courage.
- g. That the post of appellant is still lying vacant while her transfer was based on malafide.

It is, therefore, most humbly prayed that on acceptance of the appeal, the impugned order dated 17.08.2015 of the R. No. 1 be set aside and appellant be restored to his original position with all service benefits.

Appellant

Through

Saadullah Khan Marwat

Arbab Saif-ul-Kamal

&

Miss Rubina Naz
Advocates

Dated: 9.12.2015

C 9

Better copy 1

APPEAL NO. 1373/2015
MST. RAHAT UL AIN VS GOVT.

05-01-2016.

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Charge Nurse at Government Naseer Ullah Khan Babar Memorial Hospital, Kohat Road Peshawar when transferred malafidely to LRH Peshawar against the vacant post vide impugned order dated 17-08-2015 where-against she preferred departmental appeal on 09-09-2015 which was not responded and hence the instant service appeal on 09-12-2015.

That the transfer order is not in the public interest as it was made despite ban imposed by the government and due to reason that the appellant has lodged a complaint against the MS of the Hospital to Chief Minister Complaint Cell. That the appellant has not yet relieved the charge.

Points urged need consideration. Admit subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 10-02-2016 before S.D Notice of stay application be also issued for the date fixed Status quo be maintained.

Sd/-

Chairman

Appeal No. 1373/2015
MST. Rahaf-ul-Ain vs Govt

05.01.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Charge Nurse at Government Naseer Ullah Khan Baber Memorial Hospital, Kohat Road, Peshawar when transferred inafidely to LRH Peshawar against the vacant post vide impugned order dated 17.8.2015 where-against she preferred departmental appeal on 9.9.2015 which was not responded and hence the instant service appeal on 9.12.2015.

That the transfer order is not in the public interest as it was made despite ban imposed by the government and due to reason that the appellant has lodged a complaint against the MS of the Hospital to Chief Minister Complaint Cell. That the appellant has not yet relieved the charge.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 10.2.2016 before S.B. Notice of stay application be also issued for the date fixed. Status quo be maintained.

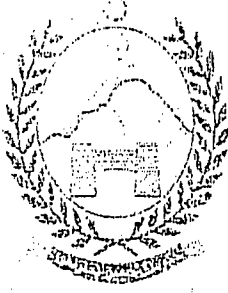
Appellant Deposited
Security & Process Fee

Chairman

10.02.2016

Counsel for the appellant, M/S Yar Gul, Senior Clerk and Muhammad Arshed, SO alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 21.3.2016 before S.B. Status-quo be maintained.

Chairman



DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

E-Mail Address: nwfpdghs@yahoo.com
Office Ph# 091-9210269
Exchange# 091-9210187, 9210196
Fax # 091-9210230

In the light of C.O.C Khyber Pakhtunkhwa Service Tribunal Peshawar, the transfer order of Mst. Rahat-ul-Ain D/O Gulzar Khan, Charge Nurse (BPS-16) Govt. Naseerullah Khan Babar Memorial Hospital Peshawar to LRH Peshawar issued vide this Directorate office order bearing Endst. No. 5143-46/E.II, dated 17.08.2015 is hereby withdrawn.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KPK, PESHAWAR.

No. 18-23 /E.II, Dated Pesh. 05 / 01 / 2017.

Copy forwarded to the:-

01. Hospital Director, MTI LRH Peshawar.
02. Medical Superintendent, Govt. Naseerullah Khan Babar Memorial Hospital Peshawar.
03. Accountant General, Khyber Pakhtunkhwa Peshawar.
04. Assistant Director (Lit.) DGHS Office Peshawar w/r to his letter No. 9160-62/AD(Lit.); dated 05.12.2017.
05. DA-concerned, DGHS office Peshawar.

For information and necessary action.

DEPUTY DIRECTOR (NURSING)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR

05/1

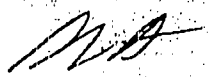
14.03.2018

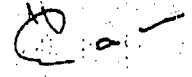
Learned counsel for the appellant present. Mr. Muhammad Jan, learned Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for reply on COC on 10.03.2018 before D.B. with main appeal.

Member

19.03.2018

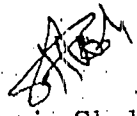
Appellant absent. Learned counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for reply on COC application on 02.04.2018 before D.B with main appeal.



(Muhammad Amin Khan Kundi)
Member


(Muhammad Hamid Mughal)
Member

02.10.2018

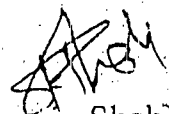
Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Adjournment requested. Adjourned. To come up along with main appeal on 08.10.2018 before D.B.

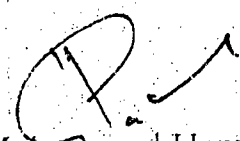

(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

08.10.2018

Learned counsel for appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Vide order of today i.e. 08.10.2018, the main service appeal has been dismissed as withdrawn. Learned counsel for the appellant did not press the present petition. Consequently the present petition is hereby dismissed being not pressed. No order as to costs. File be consigned to the record room.


(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

ANNOUNCED
08.10.2018

F
12
15-10-18

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to: The Director General
Health Services Peshawar and not to any official by name
Office Ph: (091) 9210269 Exchange: (091) - 9210157, (091) - 9210196 Fax: (091) - 9210230

OFFICE ORDER.

The following Posting/transfer of Charge Nurses (BPS-16) hereby ordered in the interest of public Service with immediate effect:-

S.No.	Name of Charge Nurse	From	To	Remarks
01	Rahat-ul-Ain D/O Gulzar Khan	Govt. Naseerullah Khan Babar Memorial Hospital Peshawar (Relieved)	Women & Children Hospital Kohat	Against vacant post administrative grounds
02	Sunzia Shehbaz D/O Shehbaz	Category-C Hospital Shabqadar Charsadda	Govt. Naseerullah Khan Babar Memorial Hospital Peshawar	Vice No. 1 above.

NB:- Arrival/Departure reports should please be submitted to the Directorate for record.

Sd/-
DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR.

No. 4642-49 /E.II. Dated Pesh. The 15-10-2018.

Copy forwarded to the:-

01. Medical Supdt. Govt. Naseerullah Khan Babar Memorial Hospital Peshawar w/r to his letter No. 6323/GNBMH, dated 28.09.2019
 02. Medical Supdt. Women & Children Hospital Kohat.
 03. District Health Officer, Charsadda.
 04. Accountant General, Khyber Pakhtunkhwa Peshawar.
 05. DAO, Kohat.
 06. DAO, Charsadda.
 07. Charge Nurse concerned.
 08. DA-concerned, DGHS K.P.K, Peshawar.
- For information and necessary action.

DEPUTY DIRECTRESS (NU)
DIRECTORATE GENERAL HEALTH SERVICES, K.P.K, PESHAWAR

To,

The Director General,
Health Services, Peshawar.

Subject: **PAYMENT OF MONTHLY SALARIES WITH HELD SINCE
TO 17-8-2015 TILL 01-02-2018.**


Respected Sir,

1. That at the time, appellant was serving the Hospital, Govt. Nasir Ullah Khan Baber, Memorial Hospital, Kohat Road, Peshawar at Charge Nurse.
2. That the then Medical Superintendent, namely Shoukat Jameel transferred appellant from Govt. Nasir Ullah Khan Baber, Memorial Hospital Peshawar to Govt. L.R.H, Peshawar on 17-08-2015 for no reason but refused to surround to his ill wishes during ban period, despite the fact that vacant vacancy was lying there in the Hospital.
3. That on 09-12-2015, appellant filed appeal No. 1373/15 before the Hon'ble Service Tribunal, Peshawar and then on 05-01-2016, stay was granted in her favour and was then performing her official duties in the Hospital.
4. That the then MS of the Hospital was not implementing stay order, so she submitted COC for compliance of the said order and then the said order was withdrawn by my honour on 09-01-2017, meaning thereby that appellant shall perform her official duties in the said Hospital.
5. That appeal was pending disposal before the hon'ble Tribunal when on 28-09-2018, the then MS again transferred her to Govt. Liaqat Memorial Hospital, Kohat and then on 08-10-2018 the said appeal was withdrawn from the hon'ble Tribunal due to change scenario.
6. That during pendency, appellant submitted numerous applications to the department as well as to hon'ble Tribunal, but the then MS was reluctant to do so.

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It is, therefore, most humbly requested that then withheld monthly salaries since 17-08-2015 till 01-02-2018 be released to appellant with mark up and obliged.

Thank You, Sir.

Appellant 
Rahat-Ul-Ain

Charge Nurse, Govt.
Liaqat Memorial Hospital,
Kohat.

Dated: 23-02-2021

83

No. 1432 RGL58039069

FOR POSTAGE AND TELEGRAPHIC CHARGES TO BE REVERSED
 Stamps affixed except in case of
 uninsured letters of not more than
 the initial weight prescribed in the
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 acknowledgment is due

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Written in letter postcard
 with the word "insured" before
 initials of Receiving Office

Insured for Rs. (in figures) (in words)

Insurance fee Rs. (in words) Kilo Grams

Name and address of sender

To,

The Director General,
Health Services, KP,
Peshawar.

Subject: REMINDER / PAYMENT OF MONTHLY SALARIES WITHHELD SINCE 17-08-2015 TILL 01-02-2018:

Respectfully Sir,

1. That at the time, appellant was serving the Hospital, Govt. Nasir Ullah Khan Baber, Memorial Hospital, Kohat Road, Peshawar as Charge Nurse.
2. That applicant submitted departmental appeal on 23-02-2021 for release of the withheld salaries to my honor but so for no action was taken. (Copy Attached)
3. That details for release of the withheld salaries have been fully mentioned in the departmental appeal which requires my honor kind consideration.

It is therefore most humbly requested that the said departmental appeal be decided in the one way or the other and the then withheld monthly salaries since 17-08-2015 till 01-02-2018 be released to appellant with mark up and obliged.

Yours obediently,

Rahat-ul-Ain
Charge Nurse, Govt. Liaqat
Memorial Hospital, Kohat
Cell. No.

Dated 31-08-2021

Handwritten signature and scribbles at the top of the page.

Handwritten text in the upper right corner, possibly a date or reference number.

Handwritten text in the upper middle section.

Handwritten text in the upper left section.

Handwritten text in the middle left section.

13-10-21
Handwritten date and possibly a name or title.

Main body of handwritten text, appearing to be a letter or report, written in Urdu.

Handwritten signature or name in the middle section, enclosed in a circle.

Handwritten signature or name at the bottom left.

Handwritten text on lines at the bottom of the page, possibly a signature or title.

Handwritten text at the very bottom of the page.

“B”

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

No.

Appeal No..... 7595 of 20 21
 Mst. Rahat-ul-Ain Appellant/Petitioner
 Versus
 D-11-Health KPK Respondent
 Respondent No..... 2

Notice to: —

Secretary Govt. of KPK Health Deptt.
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..... 7/3/22 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..... 6.11

Day of..... Jan 20 22

(For Reply)
Rahat-ul-Ain
Attorney

[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.

"B"

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

No.

Appeal No. 7595 of 20 21

Mst. Rahat-ul - Ain Appellant/Petitioner

Versus

D-G-Health KPK Respondent

Respondent No. 1

Notice to: —

Director General Health KPK Peshawar

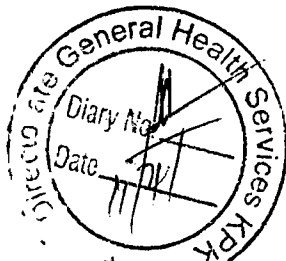
WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 7/3/22 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.

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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 6th

Day of 10th Jan 20 22



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. 7595 of 20 21 ^{SB}

Rohat-ul-Ain Appellant/Petitioner
Versus

DG Health Services KP Peshawar Respondent

Respondent No. (1)

Notice to: — DG Health Services, KP, 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} 05/07/2021 at 8.00 A.M. If you wish to urge anything against the appellant/^{or} 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.

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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 13th

Day of June 20 22

For Reply

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

* attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
Case No. While making any correspondence.

"B"

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

No..

Appeal No. 7595 of 2021

Rahat-ul-Ain Appellant/Petitioner

Versus

DG Health Services KP Peshawar Respondent

Respondent No. (2)

Notice to: — Secy Health Department, Govt of 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 05/07/2022 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.

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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 13th

Day of June 2022.

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. 7595 of 20 21
Rahat-ul-Ain Appellant/Petitioner

DG Health Services KP Peshawar Respondent

Respondent No. (2)

Notice to: Secy Health Department, Govt of 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 05/07/2022 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.

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Given under my hand and the seal of this Court, at Peshawar this 13th

Day of June 20 22.

For Reply

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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2. Always quote Case No. While making any correspondence.