Form- A

FORM OF ORDER SHEET

Court of	
Case No	1306/ 2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/09/2022	The appeal of Mr. Sana Ullah presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on Notices be issued to appellant and his counsel for the date fixed.
		By the order of Chairman REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1306 /2022

SANAULLAH

V/S

HEALTH DEPTT:

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4.	Appointment Order 01.07.2019.	С	10
5.	Service Book & pay slips	D&E	11 - 18
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7.	Impugned Order 06.08.2021	G	20
8.	Departmental Appeal	Н	2.1
9.	Vakalat nama		22

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK

ADVOCATE, SUPREME COURT,
PAKISTAN
KHATTAK LAW ASSOCIATES
TF.291-92, 3RD Floor,
DEANS CENTER PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. 1306 /2022

******				APPEL	LAN
Tribal District No	th Waziristan a	it Miranshah.			
O/O District Heal				$= \{1, 1, \frac{1}{2}\} = 1$	
Mr. Sana Ullah, E			1.7		

VERSUS

- **1-** The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- **2-** The District Health Officer, Tribal District, Miranshah.
- 3- The District Accounts Officer, District North Waziristan.

..... RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL AGAINST THE IMPUGNED ORDER DATED 06-08-2021 WHICH HAS BEEN COMMUNICATED TO THE APPELLAN ON 05-06-2022 WHEREBY THE APPOINTMENT ORDER OF THE APPELLANT HAS CANCELLED/WITHDRAWN AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF **NINETY DAYS**

PRAYER:

That on acceptance of this appeal the impugned order dated 06-08-2021 communicated to the appellant on \$6-05-2022 may very kindly be set aside and the appellant may kindly be reinstated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHWETH: ON FACTS:

- 1. That the appellant is a qualified person having Higher Secondary School Certificate and having Diploma in Clinical Assistant (ETI Technician) from Board of Professional Education, Islamabad. Copy of Educational Documents is attached.
- 2. That after retirement of appellant's father on medical ground, the appellant was appointed as EPI Technician vide order

- 3. That after appointment the appellant started performing his duties quite efficiently and to the entire satisfaction of his superior. That it is pertinent to mention that the Service Book of the appellant was also prepared and salaries of the appellant were released after verification. Copies of Service Book and pay slips are attached as Annexure...... D & E.

- 7. That appellant feeling highly aggrieved and having no other remedy filed the instant appeal on the following grounds amongst the others.

GROUNDS:

- A- That impugned order dated 06.08.2021 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent Department 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 respondents acted in arbitrary and malafide manner while issuing the impugned order dated 06.08.2021.
- D- That, the treatment meted out to the appellant clearly based on discrimination and malafide and as such the respondents violated the Principle Of Natural Justice.
- E- That no charge sheet and statement of allegation has been issued to the appellant prior to the issuance of the impugned order darted 6.8.2021.
- F- That neither show cause notice nor chance of personal hearing has been provided to the appellant before issuance of the impugned order dated 6.8.2021.
- G- That appellant has been punished on no fault on his part and as such the respondents violated the principle of locus Poenitentiae.
- H- That no regular inquiry has been conducted in the matter which is as per Supreme Court Judgments is necessary in such like cases.
- 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 the appellant may very graciously be accepted as prayed for, please.

Dated: 02-09-2022

APPELLANT

SANAULLAH

Through:

NOOR MOHAMMAD KHATTAK

WALEED ADNAN

UMAR FAROOQ MOMAND

MUHAMMAD AYUB

ADVOCATES

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL	NO.		2022
APPEAL	. 140	 	2022

SANAULLAH

V/S

HEALTH DEPTT:

AFFIDAVIT

I Sana Ullah, EPI Technician, R/o Village Dossali Tehsil & P/O Dossali. Tribal District North Waziristan, Miranshah., do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

DEPONENT

يستماللة الرَّسْمِ اللهِ الرَّسْمِ المِلْمُ الرَّسْمِ اللهِ الرَّسْمِ المِنْمُ الْمُعِمِ المِنْمُ المِنْمُ المِنْمُ المِنْمُ المِنْمُ المِنْمُ الْ BU: S.No. 016568 Board of Intermediate and Secondary Education, Bannu Klypher Pakhtunkhwa, Pakistan Roll No. 50485 Registration No: 0137-ISENW-1-13 Secondary School Certificate Examination ORIGINAL CERTIFICATE (2015 ANNIAL) Name Sansullah Salamat Khan Structure of Islamia Model High School Eidak N.W. Agency Secondary School Certificate Examination has passed the as a Regular candidate. He obtained 712 marks out of held in March, 2015 1100 and has been placed in Grade Representing Very Good. i.English 2.Urdu 3. Islamiyat Compulsory 4. Pekistan Studies 5.Mathematics 6. Physics 7.Chemistry 8.Biology Date of birth in figures: (09-04-1998). Date of birth in words: 09 April, Nineteen Ninety-Eight. Result date: 18-06-2015 Depared on: 18-03-2016 SECRETARY ASSTT: SECRETARY This contificate is issued without alle

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION BANNU

Khyber Pakhtunkhwa, Pakistan _6-

s.No. 102403

Higher Secondary School Cortificate Examination

Detailed Marks Certificate

Roll No:

21598

Group:

Humanities

Session: (Annual Part-I) 2019

Name:

Sanaullah

Father's Name: Salamat Khan

Registration No: 201999921598

appeared as

Private candidate of North Waziristan Agency

has secured the marks shown against each subject, in the Higher Secondary School Certificate Examination, held in the month of April, 2019

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SUBJECTS	M	AXIMUM M			S OBTAIN		
	Total	Theory	Practical	Theory	Practical	Total	In Words
1. English	100	100	1	74	-	74	Seventy-Four
2. Urdu	00	100		62		62	Sixty-Two
3. Islamiyat Compulsory	50	50		27		27	Twenty-Seven
4. Islamiyat Elective	00	100		40	_	40	Forty Only
5. Islamic History	100	100		55	4	55	Fifty-Five
6. Civics	00	100		70	_	70	Seventy Only

Total Marks: 550 Marks Obtained:

328 Three Hundred Twenty-Eight Only

Remarks

Date of declaration of Result: 30-07-2019

Prepared by:

Checked by:

Date of issue: 30-07-2019

Controller of Examinations

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION BANNU

Khyber Pakhtunkhwa, Pakistan

7-92517

HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

Roll No

50467

Registration No

201999921598

Group

Humanities

PROVISIONAL AND DETAILED MARKS CERTIFICATE
(CLASS XII)

Session 2020 (Annual)



• •	<i>Sanaullah</i> s	on/Daughter of <i>Salamat Khan</i>	A
	of Institution/District NORTH WAZIRISTAN TRIP	AI DISTRICT	
	has secured the marks shown against each subjec	t In the Higher Secondary Sch	nool Everyland
	(Class 12th) Annual 2020 as a Private	Candidate.	ioot examination
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Subject	Marks Part I + Part II		MARKS OBTAINED					
				Pa	art I	Part II		
<u> </u>	Theory	Pract	Total	Theory	Pract	Theory Pract	Total	In Words
1. English	100-100	• • •	200	74		As Per Part I	148	One Hundred Cod. C.
2. Urdu	100-100		200	62		A . D	1.,	One Hundred Forty-Eight
3. Islamiyat Compulsory	50	ataga tawaya	3.4	-		As Per Part I	124	One Hundred Twenty-Four
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. Islamic History	100+100		200					Eighty Only
Chile			200	55		As Per Part I	110	One Hundred Ten Only
	100+00	* •	200	70	-	As Per Part I	140	One Hundred Forty Only

Total 1100

666-B Six Hundred Sixty-Six Only

Prepared by (Perl

Checked by

(Gent

Result Date

28-07-2020

Issue Date

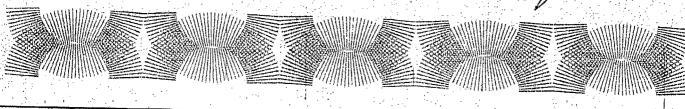
09-09-2020

Remarks: 3% marks have been added to the total on the

Note: The Marks awarded for 12th Class is the best prediction of the performance and has been awarded based on the formulae and guidolines approved by the government and recognized by IBCC due to COVID-19

Controller of Examinations





OF PROFESSIONAL EDUCATION SENSE 028



www.bpe.edu.pk

BPE/EXP-611182905

Session: 2016-2018



02852

Roll No:

2905

Duration: Two Years

Certified that Mr./Miss/Mrs.	SANA ULLAH	S/D/W.O	SĀLAMAT KHAN
Appeared and passed the trac	de proficiency test in accord	lance with the requirem	ents and Skill standard prescribed i
the "Board of Professional E Trade of Clinical Assistant (E Recommendation/Responsibility	PI Technician) Th		882 Government of Pakistan)" in the indicate is issuing by the
His/Her proficiency in the trade		s:2000 Marks Ob	tained: 1365 Grade: B
And in recognition there of this I	rade Certificate issued on the l	basis of Competency/E	xperience on the 16th March, 2018

In-charge Certification



OFFICE OF THE ADDL: HOSPITAL DIRECTOR DHO MTI BANNU

Ce	ertified that the Standin	g Medical Board carefi	ully examined . Mr /Salamat Khan orth Waziristan Distt Miranshah
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Station Bannu			
Dated. 22-05-2019	<u>)</u>		
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		Member. 4	DHQ/Medical Teaching Institution
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OFFICE OF THE DISTRICT HEALTH OFFICER NORTH WAZIRISTAN TRIBAL DISTRICT

Tel: (0928) 300788 FAX: (0928) 311662

OFFICE ORDER:

As recommended by the departmental selection committee Mr. Sanaullah S/O Salamat Khan resident of village Dossali Tehsil & P/O Dossali is hereby appointed as a EPI Technician BPS- (13320-960-42120) against the vacant post (fall on vacant due to retirement on medical board of his father Mr. Salamat Khan EX-EPI Technician) under the control of the undersigned, plus usual allowances as admissible under the rules.

His appointment shall be subjected on the following terms and conditions.

- I- He is declared medically fit for this job.
- 2- His appointment will be purely on contract /temporary basis and are liable to be terminated at any time without assigning any notice/reasons.
- 3- He will be governed by such rules and order issued by the Government from time to time for the category of staff to which they belongs.
- 4- If he wished to resign the services a prior notice of 30 days will be submitted, otherwise one month pay should be deposited in Government treasury through challan.
- 5- He will not be entitled for any TA/DA for joining the service.
- 6- If he accepts the above terms and conditions he will have to report for duty to the office of the undersigned TDNW, within 15 days of the receipt of this offer, otherwise the order will be considered as cancelled.

(Dr. Hameedullah)

No 21,73-7/ /A	
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	r information and necessary action. District Health Officer
CHATTO Micanshah	North Waziristan Tribal District

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	ق ادریت) 3- Residence <u>۱۳۳۷ کی در این کارین این کارین</u>
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-51

Miran Shah-N.W.

5#:6192

Pers #: 50512213 Buckle:

Name: SANAULLAH

TEHSIL SUPERINTENDENT VAC

CNIC No.2150248724829
GPF Interest Free

12 Active Temporary

PAYS AND ALLOWANCES: 0001-Basic Pay

1001-House Rent Allowance 45%

1210-Convey Allowance 2005

1300-Medical Allowance

1528-Unattractive Area Allow

2102-Health Allowance

2211-Adhoc Relief All 2016 10%

2224-Adhoc Relief All 2017 10%

2247-Adhoc Relief All 2018 10%

Gross Pay and Allowances

DEDUCTIONS:

GPF Balance 55,500.00

3501-Benevolent Fund

3534-R. Ben & Death Comp Fresh

R Sec:001 Month: July 2021

NW6006 -DHO Health North Wazirista

DHO HEALTH NORTH WAZIRIST

NTN:

GPF #:

øld #:

MM6006

14,280.00

2,940.00

2,856.00

1,500.00

1,500.00

10,000.00

1,332.00

1,428.00 1,428.00

48,101.00

Subrc: 2,220.00

1,200.00

600.00

Total Deductions

4,020.00

44,081.00

D.O.B

09.04.1998

LFP Quota:

MCB BANK LIMITED

02 Years 01 Months 001 Days 11305

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. Miran Shah-N.W.

Buckle:

5#:4631

Hame:

Pers #: 50512213

SANAULLAH

TEHSIL SUPERINTENDENT VAC

CNIC No. 21502

GPF Interest Free

12 Active Temporary

0001-Basic Pay

1000-House Rent Allowance

1210-Convey Allowance 2005

1300-Medical Allowance

1528-Unattractive Area Allow

2102-Health Allowance

2211-Adhoc Relief All 2016 10%

2224-Adhoc Relief All 2017 10%

2247-Adhoc Relief All 2018 10%

Gross Pay and Allowances

DEDUCTIONS:

GPF Balance 26,640.00

4200-Professional Tax

B501-Benevolent Fund

\$534-R. Ben & Death Comp Fresh

P Sec:001 Month: June 2020

MW6006 -DHO Health Worth Wazirista

DHO HEALTH MORTH WAZIRIST

HTH:

GPF #:

01d #:

14:6906

13,320.00

1,961.00

2,856.00

1,500,00

1,500.00

10,000.00

1,332.00

1,332.00

1,332.00

36,465.00

Subrc:

2,220.00

1,000.00

600.00

600.00

Total Deductions

4,420.00

32,045.00

D.O.B

09.04.1998

01 Years 00 Months 001 Days

LFP Quota: MCB BANK LIMITED

1130544251007005

-18-

Pers #: 50512213 Buckle: Name: SANAULLAH	NTN:	
TEHSIL SUPERINTENDENT VAC CNIC No. [MINOCENTAL] GPF Interest Free	GPF #: old #:	
12 Active Temporary PAYS AND ALLOWANCES: 0001-Basic Pay		MW6006 - 14,280.00
1000-House Rent Allowance 1210-convey Allowance 2005 1300-Medical Allowance 1528-Unattractive Area Allow 2102-Health Allowance		1,961.00 2,856.00 1,500.00 1,500.00
2211-Adhoc Relief All 2016 10% 2224-Adhoc Relief All 2017 10% 2247-Adhoc Relief All 2018 10% Gross Pay and Allowances DEDUCTIONS:		10,000.00 1,332.00 1,428.00 1,428.00 37,713.00
GPF Balance 39,960.00 3501-Benevolent Fund 3534-R. Ben & Death Comp Fresh	Subrc:	2,220.00 600.00 600.00
Total Deductions		3,420.00
D.O.B LFP 09.04.1998 MCB	Quota: 4 BANK LIMITED	34,293.00



"F" -19

OFFICE OF THE DISTRICT HEALTH OFFICER DISTRICT NORTH WAZIRISTAN AT MIRANSHAH

TEL: (0928)300788	FAX NO (0928)311662	Email:agencysurged	nnwtd2018	@gemail.	com
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To,

The District Account Officer Tribal District Miranshah,

Subject:

RELEASE OF PAY

Menio:

The pay of Mr. Singular (Epi Technician) BPS-12 working under the control of the undersigned was stopped due to non-submission of ODP and Monthly Progress report to the office of the undersigned well in time. Now he has submitted OPD, DHIS, Monthly Report.

Therefore, it is requested to release his pay from August 2021, to May 2022.

District Health Officer, North Waziristan District

D



HEALTH OFFICER

Ľų.	OFFICE OF THE DISTRICT HEALTH OF TOO
	TRIBAL DISTRICT AT MIRANSHAH Tel: (1928) 300788 FAX: (1928) 311662 Email: agencysurgeonnwa2018@gmail.com
	12021
	No. 13024 JOHO NWTD Dated
	To The Director General Health Services
•	KP, Peshawar
	A THE STAN AND THE WAZIRISTAN.
•	Subject: REQUEST FOR INQUIRY AGAINST DHO NORTH WAZIRISTAN.
٠.	In compliance to your office endorsement No.7047-50/E.1 dated 06/05/2021 in
	response to Secretary Health Office Letter No. SOH (E-V) 4/20201/Inquiry Report Cated Peshawar
	the April 22nd, 2021, the undersigned is pleased to cancel/withdraw all the irregular
	adjustment/regularization and appointment of the employees during the tenure of Dr. Hamid Ullah
	and Dr. Israr Ul Haq EX-DHO North Waziristan as indicated in the inquiry report with immediate
í	offeet.
	56:181 202
	District Health Officer
٠.	Tribul District Afranshah
	No. /DHO NWTD Dated the: // 708/2021
	Copy forwarded to the:
	1. Deputy Commissioner Tribal District Miranshah.
	2. PA to Secretary Health KP, Peshawar.
13 .	3. HQ-7 Dive Camp Area Miranshah. 4. All Officials Concerned.
٠	
•	District Health Officer Tribal District Miranshah

Director General, Merlth Services KPK Peshawar Subject: Appliention for reinstatement K/Liz,

With due respect it is stated that The appelant was appointed as EPT Technicion(Beig)
under appelant viscovied for decersed/incapacitated
ander appelant viscovied for decersed/incapacitated employees son. on 1/7/2019. The appelant was pergraming his duties with full devotion for the pergraming his duties with 1/4. pergriming in auces with faction of his substituted for entire entire entire his faction of his substituted by the defaultment without the substitute of his perfinent to mention that The appellant, without the number of must cheefed without appointment order was enterlied without appointment order was cheefed without appointment order was cheefed without Jangal justification Therefore The similate The Supplement and release his ontituding Jahrenis. De Jane aller

Ontest: 1/6/2002

-12-

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

AF	PPEAL NO:	OF 2022
Sana	ullah	(APPELLANT) (PLAINTIFF)
		(PETITIONER)
om singger i transisioner i Sagaran et alle et alle	VFR	<u>SUS</u>
		
Heel	th DaplA	(RESPONDENT) (DEFENDANT)
	\	
TAME	Sana Woll	
Do hereby a	appoint and co	nstitute NOOR MOHAMMAD
КНАТТАК, А	dvocate, Pesh	awar to appear, plead, act,
		o arbitration for me/us as my/our
		noted matter, without any liability
	1 '	ority to engage/appoint any other cost. I/we authorize the said
	1 7	and receive on my/our behalf all
and the second s	· · · · ·	deposited on my/our account in
the above note	d matter.	
Dated/_	/2022	
Dateu/_	/2022	L
		CLIENT
		<u>2</u> h
		ACCEPTED NOOR MOHAMMAD KHATTAK
		Han-
		KAMRAN KHAN
		UMAR FAROOQ
		\frac{1}{3}
		MUHAMMAD MAAZ MADNI
		HAIDER KHAN
		ADVOCATES
OFFICE: Flat No.(TF) 291-292	3 rd floor	
Deans trade centre Pe	eshawar cantt:	
Mobile No. 0334-5277	7 ८ J	