

27.06.2022


Son of the appellant present.

Learned Member (Executive), is on leave.
Therefore, the case is adjourned to 08.08.2022
for the same as before.


READER

8.8.2022

Due to The Public Holiday The
Case is Adjourned to 20-9-2022


Reader.

04.02.2022

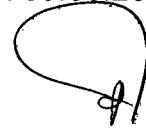
Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 14.04.2022 for the same as before.


Reader

14.04.2022

Appellant present through counsel.

Pre-admission notice was issued to the parties but due to a Note Reader, process could not be issued. All the four respondents be put on notice with last opportunity for submission of comments before date. To come up for comments/preliminary arguments on 09.05.2022 before S.B.



(Rozina Rehman)
Member (J)

09.05.2022

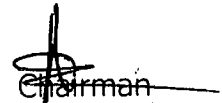
Petitioner present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Jaffar Ali Assistant for respondents present.

Today, case was fixed for submission of comments and preliminary hearing but learned counsel for appellant submitted an application for impleadment of DHO Peshawar which application was not objected to by learned AAG, hence, stands accepted. DHO Peshawar stands impleaded in the panel of respondents and office is directed to make necessary entries with red ink in the memo of appeal as well as in the relevant register. To come up for submission of comments and preliminary arguments on 27.06.2022 before S.B. *Notice be issued to newly impleaded respd. also.*

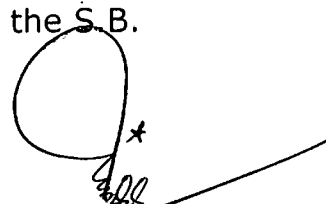

(Rozina Rehman)
Member (J)

23.07.2021 Counsel for the appellant seeks time for preparation.
Request accorded. Case to come up for preliminary
hearing on 05.10.2021 before S.B.


Chairman

05.10.2021 Learned counsel for the appellant present.
Preliminary arguments heard.

Learned counsel for the appellant argued the case at length referring to the service record of appellant that she initially joined the respondent department as LHW in a Project on 29.09.1994 whose services were regularized with effect from 01.07.2012 vide office order dated 19.09.2014. The appellant attained the age of superannuation on 01.03.2018 but has been running from pillar to post for her pension and other emoluments admissible to a government servant. The appellant submitted a departmental appeal on 13.11.2018 but to no avail till filing of the service appeal in hand on 29.01.2021. Learned counsel for the appellant was confronted with the question on limitation. Learned counsel for the appellant argued that being a case of financial liabilities against the respondents no limitation runs against recurring cause. He referred to and relied on 2021 SCMR 1230 and 2010 PLC 354 regarding admissibility of anti dated regularization of service and pension liabilities from the date of adhoc or temporary service. Moreover, two unreported judgments of Peshawar High Court in Writ Petition No. 1688-P/2015 dated 22.06.2017 and in Writ Petition No. 5551/2019 dated 01.10.2020 ^{were also produced.} It deems appropriate to issue pre-admission notice to the parties for 12.01.2022 before the S.B.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)

FORM OF ORDER SHEET

Court of _____

Case No.- 2335 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/02/2021	<p>The appeal of Mst. Razia Begum resubmitted today by Mr. Javed Iqbal Gulbella Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;">REGISTRAR</p>
2-	12.04.2021	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/04/21</u></p> <p>The appeal of Mst. Razia Begum resubmitted today by Mr. Javed Iqbal Gulbella 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;">CHAIRMAN</p>
	20.07.2021	<p>Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 20.07.2021 for the same as before.</p> <p style="text-align: right;">CHAIRMAN</p> <p style="text-align: right;">Reader</p>
	20.07.2021	<p>As 20th July, 2021 has been declared public holiday on account of Eid ul Azha, therefore, case is adjourned to 23.07.2021 for the same as before.</p> <p style="text-align: right;">Reader</p>

The appeal of Mst. Razia Begum LHW District Peshawar received today i.e. on 29/01/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of regularization order of appellant service mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.
- ② Copy of departmental appeal for granting anti dated regularization is not attached with the appeal which may be placed on it.

No. 232 /S.T,

Dt. 01/02 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

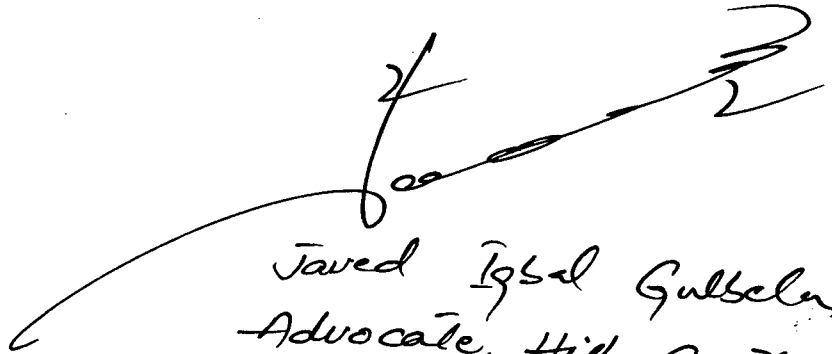
Javed Iqbal Gulbella Adv. Pesh.

Dear Sir,

Copy of Regularization Order has already been mentioned as Annexure "B" on Page # 11.

while the Departmental Appeal is already mentioned as Annexure "D" on page # 13.

- Application for Condonation of Delay has also been placed on file with the Departmental Appeal/Application.


Javed Iqbal Gulbella
Advocate, High Court, Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A No: ___/2021

Mst Razia Begum

VERSUS

Govt: of KPK & Others

I N D E X

S#	Description of Documents	Annexure	Page#
1.	Writ Petition		1-7
2.	Affidavit + Condonation of Delay + Affidavit		8, 8A, 8B
3.	Memo of Addresses		9
4.	Copy of Appointment Order	"A"	10
5.	Copy of Office Order dated 19/09/2014	"B"	11
6.	Copy of Office Order dated 19/03/2018	"C"	12
7.	Copy of Application	"D"	13
8.	Other Documents	"E"	14-21
9.	Notice		22
10.	Wakalat Nama & Power Of Attorney		23-24

Dated: 27/01/2021

Appellant

Through

Javed Iqbal Gulbela
Advocate, High Court,
Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A No: ____/2021

Mst Razia Begum LHW (BPS-5) W/o Roshan Khan R/o
Mohabat Khel, Tehsil & District Peshawar.

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Health at Civil Secretariat Peshawar.
2. Director General, Health Service, Khyber Pakhtunkhwa, Peshawar.
3. Provincial Coordinator for LHW's Program, Khyber Pakhtunkhwa, Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, at Mall Road, Peshawar.

.....Respondents

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES
TRIBUNAL ACT 1974 FOR
EXTENDING THE
REGULARIZATION ANTI-
DATEDLY W.E.F INITIAL DATE
OF ENTRY IN SERVICE BACK IN
1994 WITH ALL BACK
BENEFITS.**

Respectfully Sheweth,

1. That the Appellant is a naturally born bonafide citizen of the Islamic Republic of Pakistan & hails from respectable family.

2. That it was in backdrop that the Appellant got on to the rolls of the Respondent Department as "LHW" back in the year 1994 and has always performed ^{his} her duties with full zest and devotion and have never left any stone unturned in performance of her duties and due to the same, was appraised on certain junctures for her work, ethic and behavior. **(Copy of Appointment Order is annexed herewith as Annexure "A")**

3. That before coming onto the main crux of the instant case, and coming down to the grounds of the instant Appeal, it will be of equal importance to mention here that the services of "LHW" Lady Health Workers got regularized vide Office Order No: 10130-134/DHO/DPIU dated 19/09/2014 of the Office of District Health Office. **(Copy of Office Order dated 19/09/2014 is annexed herewith as Annexure "B").**

4. That the Appellants being one of the Senior and Oldest Employee amongst her colleagues attained the age of superannuation on 01/03/2018 and in accordance of the same, her services got relived from the rolls of the L.H.W's

Program for District Peshawar vide Office Order No: 8282-90/DHO.DPI dated 19/03/2018 of the Office of District Health Officers Peshawar. (Copy of Office Order dated 19/03/2018 is annexed herewith as Annexure "C").

5. That now coming on the main epitome of the instant case, the Appellant having served the respondent department for (24) twenty four long years and despite having served this department for more than 2 decades, got regularized w.e.f 2012, without any pension or pensionary benefits.
6. That the grievance, the solace and redressal of which the Appellant is seeking from this Hon'ble Tribunal is that the Appellant was appointed on 01/01/1994 and later got regularized on 19/09/2014 with effect from 01/07/2012 and later got retired on superannuation on 01/03/2018 as the Appellant's date of birth is 01/03/1958.
7. That in this regard, the Appellant moved applications to different high-ups for redressal of her grievances and for giving anti dated regularization since their

induction, but all ended up in fiasco. (Copy of Application is annexed as Annexure "D")

8. That from the above mentioned episode, the grievances that came into existence, having no other efficacious remedy available elsewhere, and forum to be addressed at, the Appellants approach this Hon'ble Court inter-alia:-

Grounds:-

- A. That the Appellant is naturally born bonafide citizen of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land, interpreted, guaranteed and enforced by the laws and law Courts of the land.
- B. That none of the Appellants would get any pensionary benefits arising out of their regularization of services, as none of them would have sufficient length of service on their disposal as per pension rules. And besides the above, the Appellant is appointed years back since 1994 etc, but was regularized in and after 2012 so were deprived of any pension etc.
- C. That where the service was regularized, so the same is the ample proof that not only the induction of the Appellant into

service of the Respondent Department was proper, but was against sanctioned and budget oriented posts.

D. That where the service of the Appellants were regularized and they are being kept at abeyance from any pensionary benefits under the alleged notion of less-approved service, then no fruition of regularization can be availed by the Appellant, which is not the theme or ultimate object of regularization of any service; so by virtue of this established position on the subject of regularization the non-awarding of pensionary benefits under the notion of general principle and law on pensions is not allowed and warranted; but if it is the case, then certainly the Appellant is mandatorily entitled for anti-dated seniority/regularization since their induction into service.

E. That where the appointment of the Appellant was against sanctioned and budgetary posts; & the mode of appointment was fair and transparent, where the services of the Appellant is continuous, and without any break or with negligible and malicious break then certainly the anti-date seniority of the Appellant is a fundamental right.

F. That even otherwise too, Apex Court of the Homeland have repeatedly held the view that in such like cases anti-date seniority or regularization should be cherished goal of any legislation

pertaining to the subject of regularization.

- G. That besides the above, the Appellant have at least a period of more than 24 years of service on her part, which she had rendered towards the Respondent Department and is regularized since 2012 or upwards which for itself is injustice and unfair.
- H. That above all the Appellant is at the fading age of her life and unable to be onto other service or job at the age of her life and when she even do not get any pensionary benefits, so what would be the outcome in terms of her ailing health, poverty, scarcity and dependant families and her needs.
- I. That from all prospective the Appellant is entitled to be extended the fruition and benefits of pension and any deficiency in length of service towards pensionable service can safely be swayed in period of regular service by extending the regularization anti-dately w.e. f initial induction into service.
- J. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant Appeal, the Respondent Department may graciously be directed to extend the anti-dated regularization since induction into service of the Appellant, into respondent department with all back benefits.

(7)

Any other ~~relief~~ ^{Relief} not specifically asked for, may graciously be extended in favor of the Appellant, in circumstances of the case.

Dated :27/01/2021

Appellant

Through

Jayed Iqbal Gulbela

Saghir Iqbal Gulbela

Ahsan Sardar

&

Tahir Khan

Advocates, High Court,
Peshawar

NOTE:-

As per information of my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Court.

Advocate.

8

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A No: ____/2021

Mst Razia Begum

VERSUS

Govt: of KPK & Others

AFFIDAVIT

I, Zarshan Khan S/o Roshan Khan R/o Mohabat Khel, Tehsil & District Peshawar (Special Attorney for the Appellant), do hereby solemnly affirm & declare on oath that all contents of instant Appeal are true and correct to the best of my knowledge & belief and nothing has been kept concealed from this Hon'ble Tribunal.

DEPONENT

CNIC: 17301-7406831-9

Identified By

Javed Iqbal Gulbela
Advocate, High Court,
Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A No: ____/2021

Mst Razia Begum

VERSUS

Govt: of KPK & Others

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth,

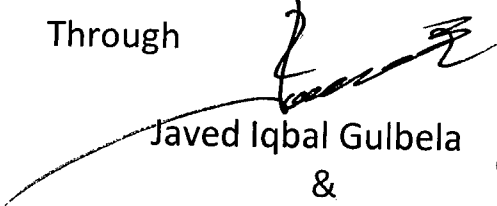

1. That the petitioner/ appellant is filing the accompanying appeal the contents of which may graciously be considered as integral part of the instant petition.
2. That the petitioner/ appellant got retired on superannuation back in the year 2018 and preferred a Departmental Appeal for her anti-dated regularization. But no response whatsoever was given upon the application of the petitioner / appellant.
3. That delay in approaching this Tribunal was for the reason that, the petitioner/ appellant is an old aged lady and due to certain medical problems, she was unable to approach this Hon'ble Tribunal, which delay was neither intentional nor deliberate but due to the above mentioned circumstances.
4. That law also favour adjudication on merits and technicalities of any sort must always be ignored while reaching a just and fair disposal of any les.

5. That for proper disposal of the accompanying case on its merits, the condonation of delay is indispensable.
6. That not only the petitioner has got a prima facie case and having balance of convenience in his favour, but would suffer irreparable loss, if the instant petition is not allowed.

It is, therefore, most humbly prayed that on acceptance of the instant petition, the delay in filing the accompanying appeal, may graciously be condoned and the accompanying appeal may very graciously be decided on its merits.

Petitioner/Appellant

Through


Javed Iqbal Gulbela
&
Saghir Iqbal Gulbela 
Advocates, High Court
Peshawar.

Affidavit:

I, Zarshan Khan S/o Roshan Khan R/o Mohabat Khel, Tehsil & District Peshawar (Special Attorney for the Appellant), do hereby solemnly affirm & declare on oath that all contents of instant Appeal are true and correct to the best of my knowledge & belief and nothing has been kept concealed from this Hon'ble Tribunal.


DEPONENT

CNIC: 17301-7406831-9

9

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

In S.A No: ____/2021

Mst Razia Begum

VERSUS

Govt: of KPK & Others

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT

Mst Razia Begum LHW (BPS-5) W/o Roshan Khan R/o
Mohabat Khel, Tehsil & District Peshawar.

ADDRESSES OF RESPONDENTS

1. Government of Khyber Pakhtunkhwa through
Secretary Health at Civil Secretariat Peshawar.
2. Director General, Health Service, Khyber
Pakhtunkhwa, Peshawar.
3. Provincial Coordinator for LHW's Program, Khyber
Pakhtunkhwa, Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, at Mall
Road, Peshawar.

Dated : 27/01/2021

Appellant

Through

Javed Iqbal Gulbela
Advocate, High Court,
Peshawar.

Ann A

OFFICE OF THE DISTRICT HEALTH OFFICER, PESHAWAR

OFFICE ORDER

Mst; Mrs/Miss / Razia B. Sani W.O/D.O/ Peshawar
R/O Vill. Adara, Kanohi, Sehar, Dist. C. Peshawar

is hereby allowed to undergo V.H.W. Training programme from 1-10-74
At B.H.U. / C.H./R.H.C. BHU Adara
with the following terms and conditions:-

1. She will work five days a week (Sunday to Thursday).
2. The training period will be for three months the Health institution and one year in the field working three weeks in the field and one week in the Health Institution.
3. The worker will be paid Rs:50/- Per day as stipend per working days.
4. She will be resident of the area to which she will provide services from her residence.
5. Her training will be liable to terminated if she does not full fill the conditions, Criteria laid down for V.H.W. selection, (i.e. Middle Pass preferably Married, Middle aged and resident of area for which she is selected.

Sd/
(Dr. Sarfaraz Khan Afridi)
District Health Officer
Peshawar

No. 9814-20 /DHO/F/Planing Dated Peshawar the 29/10 1994.

A copy is forwarded to the:-

1. Director General Health Services N.W.F.P., Peshawar.
2. Asstt: Distt: Health Officer Peshawar.
3. Asstt: Distt: Health Officer Nowshera.
4. Inspectress Health Services N.W.F.P. Peshawar.
5. Asstt: Inspectress Health Services Peshawar.
6. Medical Officer Incharge C.H./R.H.C./B.H.U./
7. Mst/Mrs/Miss/ Razia B. Sani

for information and necessary action.

MAJED JOBAL Gul Bela
Deputy Law Chamber
Appellate High Court Peshawar
Phone 03-5240587

(Dr. Sarfaraz Khan Afridi)
District Health Officer
Peshawar

Mahboob. / ***

Chief Officer
District Health Officer
Peshawar

11

Ann B

Health Department, Khyber Pakhtunkhwa
Lady Health Workers Program
District Programme Implementation Unit, Peshawar

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR
OFFICE ORDER

In terms of Section 4 (1), read with 1st proviso there under, of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Program and Employees (Regularization and Standardization) Act 2014, services of the following Lady Health Workers Program employees of district PESHAWAR Khyber Pakhtunkhwa are hereby regularized w.e.f 1st July 2012. Their terms and conditions of service will be governed under the Khyber Pakhtunkhwa Regulation of Lady Health Workers Program and Employees (Regularization and Standardization) Act, 2014 and rules to be made there under.

Sr. No	Name of Community Embedded Employee	Father Name	Husband Name	Date of appointment	FLCF	Name of Catchment Area
1	Razia Begum	Ajab Gul	Roshan Khan	10/01/1994	BHU Adizai	Mahabat Khail
2	Mazhina	Mir Akbar	Noor Zada	22/09/1996	BHU Adizai	habo khail
3	Wasila	Bashir Ali		25/04/2003	BHU Adizai	Doba
4	Fozia	Ziawar Shah	Wahyat Shah	29/09/1996	BHU Adizai	Mistri Khail
5	Nadia Bibi	Pir Muhammad		25/07/2005	BHU Adizai	Jahangir
6	Shah Ruk	Mustaq Ahmad	Makbol Shah	27/05/2005	BHU Adizai	Fatih Khail
7	Sakina Mosa	Gul Azam Shah	Mosa Kaleem	25/04/2003	BHU Adizai	Adam Khail
8	Zohir Khair	Hanan Khan	Roshan Khan	08/01/2000	BHU Adizai	Tazi Khail
9	Shahreen Bibi	Fida Hussain	Irfan Ullah	07/01/2004	BHU Adizai	Majik Abad
10	Neghat Mehmuz	Islam Shah		15/08/2000	BHU Adizai	Mirza Khail
11	Yasmin begum	Omar Gul	Razam Khan	31/12/2001	BHU Adizai	Jogy Khail
12	Sakina Bano	Shah Muhammad	Khawar Khan	25/04/2003	BHU Adizai	Khawaja Khail
13	Nazakat Yasmin	Taqat Ali Khan	Saleh Reeman	07/01/2004	BHU Adizai	Yousif Khail
14	Rukhsana	Ghulam Sarwar		25/04/2003	BHU Adizai	Qado Khail

In exercise of powers conferred under sub section (2) of the Section 4, the above Community Embedded Employees are placed in the following pay scales as mentioned against their respective designations.

Name of Post	Basic Pay Scale	No of staff
Lady Health Supervisor	7	0
Lady Health Worker	5	14
Driver	4	0

Sd.....
District Health Officer
Peshawar

No: 10130-136/DHO/DPIU

Date: 19/09/2014

Copy forwarded to:-

1. Accountant General Office Khyber Pakhtunkhwa, Peshawar.
2. Director, General Health Services Khyber Pakhtunkhwa, Peshawar.
3. Provincial Coordinator LHWs Programme Khyber Pakhtunkhwa, Peshawar.
4. PS to secretary Health, Govt Khyber Pakhtunkhwa, Peshawar.
5. District Coordinator LHWs Programme Khyber Pakhtunkhwa, Peshawar.
6. SMO/MO Incharge BHU Adizai
7. All Officials Concern Staff

JAVED IQBAL
District Health Officer
Peshawar
Advocate High Court Peshawar
Mob: 0345-333-3333



OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR
OFFICE ORDER
RELIEVING LHWs ATTAINED THE AGE OF SUPERANNUATION

Reference to PPIU Letter No.25 dated 06/01/2014 & PPIU letter No.2729 dated 29/10/2013, the following LHW is hereby relieved from LHWs Program District Peshawar with effect from 1st March 2018, who has attained the age of superannuation is as under :-

S No	Name of LHWs	Name of Health Center	Date of Birth	Bank Name/ Branch	REMARKS
1	Razia Begum W/o Roshan Khan	BHU Adizai	01-03-1958	HBL Badaber Branch A/C 3304-4	As reported by the concerned LHS Dil Shad attached to BHU Adizai reached to age superannuation by CNIC.

The above mentioned LHW is hereby directed to immediately return the entire assets of LHWs Programme in her custody to this office through her LHS concerned.

Sd/xxxxxxxxxxxxxxxx
District Health Officer
Peshawar

No. 8282-90/DHO. DPIU

Dated Peshawar, the 19/03/2018

Copy to:-

1. Accountant General Khyber PakhtunKhwa Peshawar.
2. Director General Health Khyber PakhtunKhwa Peshawar.
3. The Provincial Coordinator, LHWs Program Khyber PakhtunKhwa Peshawar.
4. District Coordinator LHWs Program Peshawar.
5. M.O I/C concerned Health Facility
6. LHSs Concerned
7. LHW Razia Begum W/o Roshan Khan attached to BHU Adizai.
8. Account section- to stop her pay with immediate effect.
9. Personal File ✓

JAVED IQBAL
District Health Officer
Peshawar

District Health Officer,
Peshawar.

Ann D

محرمیت جناب DHO شرکت پاور

جناب عالی

مورد بیان گزارش ہے۔ کہ میں رفیق بیگم

1994-09-09 کو کراچی ہوائی فوری - اور 18-03-01 کو صبری

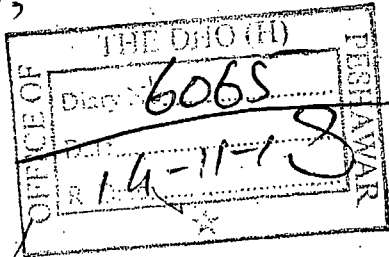
عمر 60 سال پوری ہوائی - میں نے پیلے ہی LHS

کے دریک درخواست جمع کرائی تھی لیکن ابھی تک نہ مجھے صبری بقایا جات ملے۔ نہ کوئی دوسری

سراعات - براہ ہر ایمان مجھے صبری واجبات

ادا کرنے کے انتظامات صادر فرمائیں۔

عسین نواز حسن پوری



Handwritten signature and stamp of Rafiq Begum.

Forwarded to DHO for further

Action

Khushal issue relieving order

X LHW

Muzaffar Khan A. N. Adzezi Distt. Peshawar 13-11-18

Handwritten signature and date 12/12/18

Handwritten text: می ایچ ایو آڈری

Handwritten text: صبری LHS، جب بیگم کی عمر 60 سال ہوئی تھی...

LHS Peshawar A. N. Adzezi

(For use in Police Department only)

Heirs:

- 1. _____
- 2. _____
- 3. _____

Verification Roll No. _____ dated _____ received back _____

Left Thumb Impression

Qualification	Date	Qualification	Date
English		① matric passed from BSE Psh First Arts	
Pushto		in 2016 (A) under Roll No-169352 marks obtained. 858/1100 B.L. Or B.A.	
Urdu		Pleadership examiantion	
Plan-drawing		Training School Final examiantion	
Finger Print		Other qualifications C.H.I. Training Done	
Drill Instructing			
Court Duties			
Reserve Duties			

JAVED AL Gul Bela
Datidzal Chamber
District Peshawar

District Health Officer
Peshawar

N.B. Line to be drawn under the qualification possessed.

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

1. Name: RAZIA BEGUM

2. Race: Afghan

3. Residence: Mohabat Kad, Adizai, Dist. Peshawar.

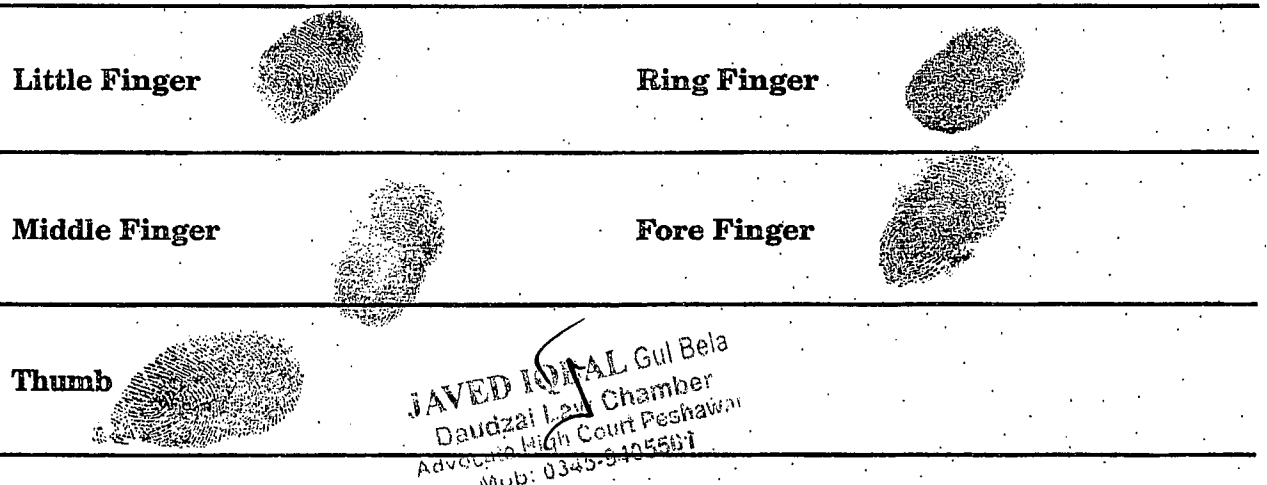
4. Father's name and residence: Hijab Gul (as above)

5. Date of birth by Christian era as nearly as can be ascertained: (01-03-1958)
01st March Nineteen fifty eight

6. Exact height by measurement: 5-3"

7. Personal marks for identification: NIL

8. Left hand thumb and finger impression of (Non-Gazetted) officer:



JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405601

9. Signature of Government Servant: [Signature]

10. Signature and designation of the Head of the Office, or other Attesting Officer. [Signature]
District Health Officer
Peshawar

7h
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Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
LHW Fixed		Pay for 1200/- Pm				29/09/99	[Signature]
BPS-85-LHW (5400-260-13250)		Pay for 5400/- Pm				01/07/2013	[Signature]
do-		Pay for 5665/- Pm				01/12/2013	[Signature]
do-		Pay for 5900/- Pm				01/12/2014	[Signature]

RAJESH K. Gul Bela
 Daudzai Law Chamber
 Advocate High Court Peshawar
 P.O. Box-2403/01

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				Leave			
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Period	Government to which debit to	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				<p>Appointed as <u>L.H.W</u> on fixed average pay @ Rs: <u>1200</u> vide EDO (1) Peshawar Office Order No. <u>9814-201</u> dated <u>29/09/1994</u></p> <p>In the Light of Honorable Supreme Court of Pakistan the services of Lady Health Workers program has been regularized vide PC LHWS program Letter No.1549 dated 22/09/2014 in BPS 05 w.e.f 01/07/2012, vide DHO Peshawar letter No. <u>10130-136</u> dated 19/09/2014.</p>			
<p>30/11/2013</p> <p>District Health Officer Peshawar</p> <p>Annual Increment Allowed</p>					<p>District Health Officer Peshawar</p> <p>Service verified From <u>30/11/2012</u> to <u>30/11/2013</u></p>		
<p>District Health Officer Peshawar</p> <p>30/11/2014</p> <p>District Health Officer Peshawar</p> <p>Annual Increment Allowed</p>					<p>District Health Officer Peshawar</p> <p>Service verified From <u>30/11/2013</u> to <u>30/11/2014</u></p>		
<p>District Health Officer Peshawar</p> <p>District Health Officer Peshawar</p>					<p>District Health Officer Peshawar</p>		

MAJED QBAL Cui Bala
 District Law Chamber
 District High Court Peshawar
 011-332-5005501

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Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
LAW-BPS-05 (6985-340-17185)			Pay Rs 7657/- p.m.			01/07/2015	[Signature]
-do-			Pay Rs 8005/- p.m.			01/12/2015	[Signature]
LAW-BPS-05 (8590-420-21190)			Pay Rs 9859/- p.m.			01/07/2016	
			Pay Rs 10250/- p.m.	10270		1/12/2016	

JAVED IQRAL Gul Dala
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob. 0345-9405301

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Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
					Period			Government to which debitable
		<i>Pay fixed as per Revised Pay Scale Rules 2015</i>						
<i>30/11/2015</i>		Annual Increment Allowed	<i>[Signature]</i> District Health Officer Peshawar			<i>[Signature]</i> District Health Officer Service verified From <i>1/12/2014</i> to <i>30/11/2015</i>		
<i>[Signature]</i> District Health Officer Peshawar		Annual Increment Allowed	<i>[Signature]</i> District Health Officer Peshawar			<i>[Signature]</i> District Health Officer Peshawar		
		<i>Pay fixed as per Revised Pay Scale Rules 2016</i>						
<i>30/11/2016</i>		Annual Increment Allowed	<i>[Signature]</i> District Health Officer Peshawar			<i>[Signature]</i> District Health Officer Peshawar	<i>TR NO: 649</i> <i>6/2/17</i> <i>Dr. M. B. 122469/2017</i> <i>A/C of 107 Peshawar</i> <i>W. of 1-7-16 to 31-1-2017</i>	
<i>[Signature]</i> District Health Officer Peshawar		Annual Increment Allowed	<i>[Signature]</i> District Health Officer Peshawar			<i>[Signature]</i> District Health Officer Peshawar	<i>[Signature]</i> District Health Officer Peshawar	
<i>[Signature]</i> District Health Officer Peshawar		Annual Increment Allowed	<i>[Signature]</i> District Health Officer Peshawar			<i>[Signature]</i> District Health Officer Peshawar	<i>[Signature]</i> District Health Officer Peshawar	

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 Daudz... Law Member
 Advocate High Court Peshawar
 Mob: 0345... 5591

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Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
B-5 10260-80-25260	LHW			Pay Rs. 12760/-		12/12/17	
do-				Pay Rs. 12760/-		12/12/17	

Signature of the holder or other person in actual possession

32

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ATTORNEY GENERAL Gui Bela
 National Law Chamber
 Advocate High Court Peshawar
 Mob: 0345-9405574

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitble to another Government		
				Period	Government to which debitble		
				<i>Pay fixed as per Revised Pay Scale Rules 2017</i>			
				District Health Officer Peshawar,			
<i>11 30/2017</i>			Annual Increment Allowed			Service verified From <i>1/1/2016</i> to <i>30/11/2017</i>	
				District Health Officer Peshawar.		District Health Officer Peshawar.	
				<i>Pay Stopped & Relined from Service due to Age Superannuation vide DHO Pesh office order letter No. 8282-90/DHO-DPIV date 19/03/2018.</i>			
				District Health Officer Peshawar.			
				District Health Officer Peshawar.			

Office
Peshawar

21

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In S.A No: ____/2021

Mst Razia Begum

VERSUS

Govt: of KPK & Others

NOTICE

To,

1. Government of Khyber Pakhtunkhwa through Secretary Health at Civil Secretariat Peshawar.
2. Director General, Health Service, Khyber Pakhtunkhwa, Peshawar.
3. Provincial Coordinator for LHW's Program, Khyber Pakhtunkhwa, Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, at Mall Road, Peshawar.

SUBJECT:- NOTICE FOR FILING WRIT PETITION

Please take notice that I am filing Writ Petition before the Hon'ble Peshawar High Court Peshawar.

Dated: 27/01/2021

Appellant
Through
Javed Iqbal Gulbela
Advocate, High Court,
Peshawar

“B”

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

Recd No.

SB

Appeal No. 2335 of 20 21

Razia Begum Appellant/Petitioner

Versus

Govt of KPK through Secy Health Peshawar Respondent

Respondent No. (5)

Notice to: — DHO 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 27/06/2022 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 along with 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 25

Day of May 2022

(For Comments & Arguments)

[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.