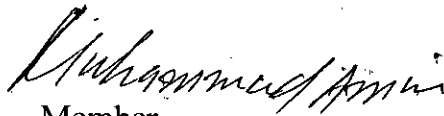



13.11.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. AG alongwith Faiz Muhammad, Assistant for the respondents present. Arguments heard and record perused.

This appeal is disposed of as per our detailed judgment in connected service appeal No: 678/2013, entitled "Sher Zada Versus the Director Health (FATA) Department, Peshawar and another". Parties are left to bear their own costs. File be consigned to the record room.

  
Member

  
Chairman

ANNOUNCED


13.11.2017

703/2013

13.12.2016

Counsel for the appellant and Mr. Said Muhammad, Head Clerk alongwith Additional AG for the respondents present. Representative of the respondents submitted before the court that record of the appellant is available with the Agency Surgeon Officer and he will produce the same before the next date. Representative of the respondents is directed to produce the appointment order of the appellant alongwith salary issued to him and other related documents. To come up for record and arguments on 20.4.17 before D.B.

  
(ASHFAQUE TAJ)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

20.04.2017

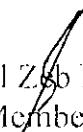
Counsel for the appellant present. Mr. Said Muhammad, Head Clerk alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Representative of the respondent-department submitted record which is placed on file. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 12.07.2017 before D.B.


  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

12.07.2017


Counsel for the appellant and Asstt. AG ~~alongwith~~ the respondents present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 13.11.2017 before the D.B.

  
(Gul Zeb Khan)  
Member(E)

  
(M. Amin Khan Kundi)  
Member(J)

09.07.2015

Counsel for the appellant and Mr. Muhammad Maaz Madni, Assistant Litigation Officer alongwith Addl: A.G for respondents present. Rejoinder submitted. Learned counsel for the appellant requested for adjournment that due to rush of work he could not be prepared the arguments. File to come up for arguments on 01-01-2016.

  
Member

  
Member

01.01.2016

Clerk to counsel for the appellant and Mr. Maaz Madni, Assistant Litigation Officer alongwith Assistant AG for respondents present. Arguments could not be heard due to incomplete Bench. To come up for arguments on 27.5.2016 before D.B.

  
Member

27.05.2016

Counsel for the appellant and Mr. Maaz Madni, Assistant Litigation Officer alongwith Addl: AG for respondents present. Learned counsel for the appellant requested for adjournment. Adjourned for arguments to 28.9.2016 before D.B.

  
Member

  
Member

28.09.2016

Counsel for the appellant and Addl. AG for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 08.02.2017 before D.B.

  
Member

  
Chairman

(17) 13.01.2015

Counsel for the appellant and Mr. Muhammad Maaz Madni, Assistant Litigation Officer on behalf of respondents with Addl: A.G present. Another request for submission of written reply/comments was made despite the fact that last chance was extended to the respondents on the previous date.

It is noted with concern that the government functionaries do not pay due attention towards direction of the court despite the fact that they are public servants and obliged to adhere to the orders of the Court including defending the interest of the government. Let the respondents be informed that in future, concerned authorities are to be dealt with strictly in accordance with law.

Last chance is extended with the direction to the respondents to submit written reply/comments on 16.01.2015.

  
Chairman

12. 16.01.2015

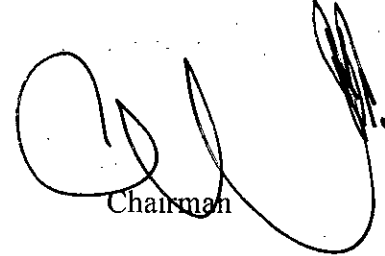
Counsel for the appellant and Mr. Muhammad Maaz Madni, Assistant Litigation Officer alongwith Addl: A.G for respondents present. Comments submitted. To come up for rejoinder as well as final hearing/arguments before D.B on 9.7.2015 alongwith connected appeals No. 678, 679,680,681,682,683,684,685,686,687,688,689,690 and 692to 703 of 2013.

  
Chairman

8-

6.3.2014

Counsel for the appellant and Mr. Muhammad Maaz Madni, Assistant Litigation Officer on behalf of respondents with AAG present. Written reply has not been received, and request for further time made on behalf of the respondents. Another chance is given for written reply/comments on 5.6.2014.

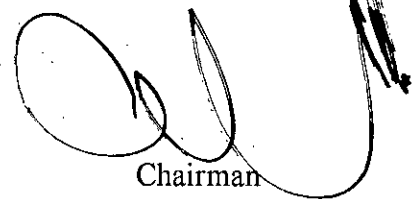


Chairman

9-

5.6.2014

Counsel for the appellant and Mr. Muhammad Maaz Madni, Assistant Litigation Officer on behalf of respondents with AAG present. Request for further time made on behalf of the respondents due to security situation prevailing in the area. Yet another chance is given for written reply/comments alongwith connected appeals on 11.9.2014.

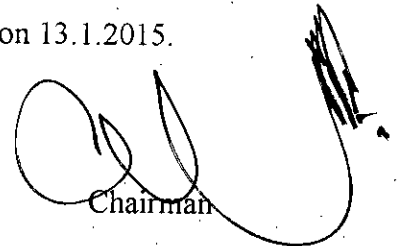


Chairman

10-

11.9.2014

Counsel for the appellant and Mr. Kabirullah Khattak, AAG for the respondents present. Neither representative of the respondents is present nor written reply has been furnished despite yet another chance given for the purpose on the previous date. On the request of learned AAG, a last chance is given for written reply/comments alongwith connected appeals on 13.1.2015.



Chairman

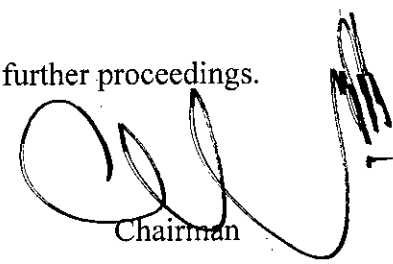
5-  
04.10.2013

Counsel for the appellant present and heard on preliminary. Contended that the appellant has not been treated in accordance with law/rules. The appellant took over charge w.e.f 04.12.2011 since he performed his duty as verified by respondent No.2 vide page No.6 of the instant appeal but he has not paid monthly salary. He filed departmental appeal on 02.01.2013 which has not been responded with statutory period of 90 days, hence the present appeal on 18.04.2013. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections/limitation. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notice be issued to the respondents. Case adjourned to 05.12.2013 for submission of written reply.

  
Member.

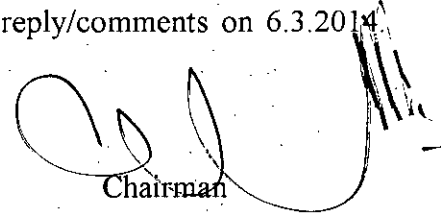
6- 04.10.2013

This case be put before the Final Bench I for further proceedings.

  
Chairman

7- 05.12.2013

Clerk of counsel for the appellant and Mr. Muhammad Maaz Madni, Assistant Litigation Officer on behalf of respondents with AAG present. To come up for written reply/comments on 6.3.2014

  
Chairman

3  
18.6.2013

Munshi to Counsel for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 20.8.2013.

  
Reader

4- 20.08.2013



No one is present on behalf of the appellant. Case is adjourned. To come up for preliminary hearing on 04.10.2013..

  
Member

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 703/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	18/04/2013	<p>The appeal of Mr. Zabi Ullah presented today by Mr. M. Asif Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	24-4-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>18-6-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No 703 2013

Zabi hullah

VIS

Agency Surgeon (NWA) & Others

INDEX

S.No	Documents	Annexure	Page
1	Memo of Appeal		1-3
2	Appointment Order / <i>Service BPSII</i>	A	04 - 4-A
3	Arrival Report	B	05
4	Performance Certificate	C	06
5	Departmental Appeal	D	07
6	Wakalat Nama		

Zabi hullah  
Appellant

Zabi hullah

Through:

M. Asif Yousafzai  
M. ASIF YOUSAFZAI  
ADVOCATE

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

Appeal No. 703 /2013

**A.W.P. Province**  
**Lawyer**  
**18-4-2013**

Mr. Zabih Ullah Malaria Supervisor,  
North Waziristan Agency,

**APPELLANT**

VERSUS

1. The Director Health (FATA), Department, Warsak Road, Peshawar.
2. The Agency Surgeon, North Waziristan Agency, Miranshah.

**RESPONDENTS**

.....

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974 FOR GRANTING MONTHLY PAY WITH EFFECT FROM SEPTEMBER, 2012 TILL DATE AND ONWARD AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

.....

**PRAYER:**

**18/4/13**

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO PAY MONTHLY SALARIES TO THE APPELLANT WITH EFFECT FROM SEPTEMBER, 2012 TILL DATE AND ONWARD BEING STILL IN SERVICE AND PERFORMING DUTY. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWETH:**

1. That the appellant was appointed as Malaria Supervisor. in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental Selection Committee. The appellant took over charge on 01-01-2012 (F.N) in pursuance his appointment order. It is worth to mention here that after joining duties proper service book of the appellant has also been maintained till-date being civil servant and employee of the Health Department on FATA side at N.W.A. The Appointment order recorded/mentioned in the Service Book, the copy of which is attached as Annexure-A and Arrival Report is attached as Annexure-B.
2. That the appellant has been continuously performing his duty as civil servant of the Health Directorate FATA in N.W.A. upto the entire satisfaction of his superior and there are no complaints against the appellant so far.
3. That all of sudden that without passing any proper order, the pay of the appellant has been stopped since September, 2012 and when the appellant asked from the concerned office about the salaries he was orally told that his pay has been stopped by the Agency Surgeon.
4. That then the appellant forthwith filed an appeal on 02-01-2013 and waited for 90 days but no action has been taken on the departmental appeal of the appellant so far, hence the present appeal on the following grounds amongst the others: Copy of Appeal is attached as Annexure-C.

**GROUND:**

- A) That not paying the monthly salaries to the appellant and not taking any action on the departmental appeal of the appellant, is against the law, facts, norms of justice, therefore, not tenable.

- B) That the appellant is still in service performing his duty and has not been terminated so far, therefore, the appellant is entitled for his claim of the monthly salaries illegally.
- C) That not paying the monthly salaries to the appellant and stoppage of pay without any proper order, actually amounts to an arbitrary act on the part of the respondents which is not tenable in the eyes of law.
- D) That the appellant has not been treated according to law and rules and has been deprived from the monthly salaries despite proper performance of duty, thus the action of the respondents is totally illegal and without lawful authority.
- E) That being a civil servant, the appellant is entitled to the salaries of the post in accordance with Section-17 of the Civil Servant Act, 1973.
- F) That the appellant has been condemned unheard and no prior chance of defense or hearing was provided to the appellant while stopping his monthly salaries.
- G) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

*Zabihullah*  
Appellant  
Zabih Ullah

THROUGH:

*M. Asif Yousafzai*  
( M. ASIF YOUSAFZAI )  
ADVOCATE, PESHAWAR.

- 1- Name (نام) Mr. Zabih Ullah
- 2- Nationality and Religion Pakistani (Islam)  
(قومیت اور مذہب) Muslim
- 3- Residence village Tehsil Miala N.W.A.  
(مستقل رہائش)
- 4- Father's name and residence Muhammed Rauf  
(والد کا نام اور پتہ)
- 5- Date of birth by christian era as nearly as can be ascertained 24-03-1983  
(تاریخ پیدائش مطابق سن عیسوی)
- 6- Exact height by measurement 5-4"  
(قد و قامت)
- 7- Personal mark of identificator nil  
(نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger



Ring Finger

(چھنگلیا کے ساتھ کی انگلی)



Middle Finger

(انگشت میانیہ)



Fore Finger

(انگشت شہادت)



Thumb

(انگوٹھا)



9. Signature of Govt. Servent

(سرکاری ملازم کے دستخط)

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

(تصدیق کنندہ کے دستخط اور مہر)

*Ali*

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔

انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

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

Service Appeal No. 703 /2013

Mr. Zabihullah. VS Director Health (FATA) & anthers:

.....  
**REJOINDER ON BEHALF OF APPELLANT**  
.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee. Moreover, the appellant attached Service Book with the appeal, wherein page 4 A it is clearly mentioned that the appellant was appointed on dated 31-12-2011
- 2 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant, which is evident from performance certificate which is attached with the appeal.
- 3 Incorrect. The appellant has paid salary up to August 2012 by the concerned official. (Copy of salary slip of August 2012 is attached as Annexure- R3)

- 4 Incorrect. The appellant has filed departmental appeal which is attached as D on page 6 with main appeal. Besides that the appellant and other colleagues had also filed a joint application / appeal which was properly endorsed and reported back by the concerned office. The denial of the respondents is thus not tenable mere by denying that fact. *(Copy of joint appeal and report back by the concerned office are attached as R1 & R2).*

**GROUNDS:**

- A- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official and after September 2012 stoppage of monthly salaries of the appellant and not taking action on the departmental appeal of the appellant is against the law, rules, norms of justice and material on record. Therefore not tenable and liable to be set aside.
- B- Incorrect. While para B of the appeal is correct.
- C- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official. Therefore the appellant is entitled for salaries after September 2012 till date as the appellant is still in service and has not been terminated so for.
- D- Incorrect. While para D of the appeal is correct.
- E- Incorrect. While para E of the appeal is correct.
- F- Not replied according to para F of the appeal. Moreover para F of the appeal is correct.
- G- No comments.

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

*Zabirullah*  
APPELLANT

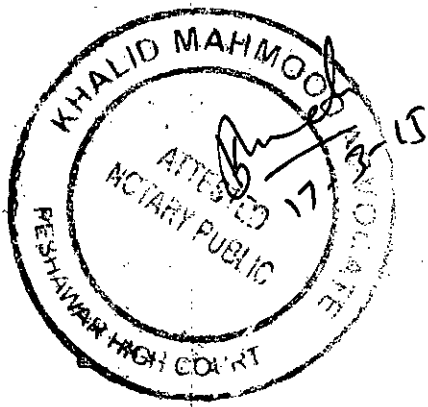
Through:

*M. Asif Yousafzai*  
( M. ASIF YOUSAFZAI )  
ADVOCATE, PESHAWAR.  
&

(TAIMUR ALI KHAN)  
ADVOCATE, PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.



*Zabirullah*  
DEPONENT



R1 (9)

**OFFICE OF THE AGENCY SURGOEN NORTH WAZIRISTAN MIRANSHAH.**

PHONE & FAX; 0928-300788.

NO 2801 / DATED: MIRANSHAH THE 30/9 /2011.

To The Director Health Services.  
FATA Warsak Road Peshawal.

SUBJECT: APPOINTMENT DURING THE LAST THREE(3) YEARS.

Memo: Reference your Telephonic Message to day on 30-09-2011..

I have the honour to submit herewith the detail list of appointment during the last three years as follows.

S.NO	NAME	F:/NAME	Domicile	Designation	Date of Arrival
1	Mr. Khaista Rehman	Fateh Sand	Bajaur	Medical Tech	3-11-2009
2	Mr. Shaheed Ullah Jan	Jan Behader	NWA	Medical Tech	03-11-2009
3	Mr. Zahid Iqbal	Banat Khan	NWA	Medical Tech	3-11-2009
4	Mr. Akhtar Ayub	Janabat Khan	NWA	Medical Tech	3-11-2009
5	Mr. Safder Elahi	Noor Elahi	NWA	Medical Tech	3-11-2009
6	Mr. Arifullah	Khushal Khan	NWA	Medical Tech	06-12-2009
7	Mr. Naveed Iqbal	Khan Behader	NWA	Medical Tech	12-11-2009
8	Mr. Wadood Ali Shah	Muhammad Nawaz Shah	Bannu	Medical Tech	10-01-2010
9	Mr. Farhad Ullah	Made Jan	NWA	Medical Tech	18-06-2010
10	Mr. Shahid ullah	Muhammad Nawaz	NWA	Dispenser	3-11-2009
11	Mr. Abdul Hanan	Gul Faraz Khan	Bajuar	Dispenser	
12	Mr. Zaheer ud Din	Noor Adil Shah	NWA	Diepsenser	3-11-2009
13	Mr. Inam Ullah	Shahadat Khan	NWA	Dispenser	22-11-2009
14	Namat Rasool	Azad Khan	NWA	Dispenser	25-03-2010
15	Mr. Nazeer Ahmad	Muhammad Younas	Bajaur	Dispenser	20-12-2009
16	Mr. Muhammad Qasim (ADP)	Muhammad Zuman	NWA	Dispenser	22-11-2009
17	Mr. Sayed Nawaz (ADP)	Sahed Nawaz	NWA	Dispenser	18-11-2009
18	Mr. Habib ullah (ADP)	Ber Mullah Khan	NWA	Dispenser	22-11-2009
19	Mr. Imran Ullah (ADP)	Muhammad Niaz	NWA	Diempenser	24-11-2009
20	Mr. Muhammad Zunir (ADP)	Noor Madat Khan	NWA	Dispenser	06-11-2009
21	Mr. Muhammad Akram (ADP)	Muhammad Saleem Shah	NWA	Dispenser Adjusted Against LHV in ADP	06-11-2009
22	Mr. Rafi Ullah (ADP)	Mir Sahab Khan	NWA	Dispenser Adjusted Against LHV in ADP	15-11-2009

3	Mustafa Khan (ADP)	Rashid Khan	NWA	Dispenser Adjusted Against LHV in ADP	25-12-20
24	Hafiz Noor (ADP)	Sayed Manoor	NWA	Dispenser Adjusted Against LHV in ADP	1-1-2010
25	Miss. Basnoor Bibi	Samin Ullah	Bannu	LHV	12-11-20
26	Miss. Tabsuam	Gul Naib Khan	Bannu	LHV	15-11-20
27	Miss Husai	Adil Khan	NWA	LHV	15-11-20
28	Miss. Zubida Khanam	Kari mud Din	D.I. KHAN	LHV	19-12-20
29	Miss. Komal Saba	Palol Khan	NWA	LHV	23-12-20
30	Miss: Romana Akram	Muhammad Akram	D.I.Khan	LHV	23-12-20
31	Faiqa	Habib Ullah	Bannu	LHV	31-12-20
32	Zar Taj	Hukam Zada	Bannu	LHV	6-1-2010
33	Miss Permeen Gul	Gul Shah Zada	BANNU	LHV	30-1-20
34	Miss. Nasima Bibi	Noor Bad Shah	Bannu	LHV	20-02-20
35	Miss Zakishah	Din Bad Shah	NWA	LHV	18-06-20
36	Miss. Waheeda LHV	Aman ullah	NWA	LHV	2-6-2010
37	Mr. Attaur Rehman	Wali Muhammad	NWA	Assistant Superintendent Malaria	25-06-2010.
38	Mr. Sajid Khan	Murad Ali	NWA	Dental Tech	18-11-20
39	Mr. Feroz Shah	Hakim Shah	NWA	Lab Asstt Against Dispense	18-11-20
40	Sayel Khan	Zarbab Khan	NWA	EPL Tech Against LHV	12-11-20
41	Mr. Asif Mehmood	Taj Muhammad	NWA	X-Ray Against LHV	3-12-20
42	Mr. Sabghat ullah	Zaffar Ali	NWA	Lab Tech Against LHV	3-12-20
43	Sardar Ayub	Ayub Khan	NWA	EPL Tech Against LHV	6-12-20
44	Mr. Khatib Ullah	Saeed Khan	NWA	EPL Tech Against TSV	3-12-20
45	Mr. Gul Rehman	Inayat Khan	NWA	Dispenser Against LHV	10-12-20
46	Mr. Salim ullah	Hanif ullah	NWA	Lab Asstt Against ECG	17-12-20
47	Mr. Shahid Ullah	Muhammad Noor Gul	NWA	Lab Asstt Against LHV	25-12-20
48	Mr. Noor Hayat	Salim Muhammad	NWA	Dispenser Against LHV	15-01-20
49	Mr. Ajab Noor	Shamaraz	NWA	Lab Asstt Against LHV	2-4-20
50	Mr. Niazam ud Din	Fazal Ghani	NWA	MT Against LHV	2-4-20
52	Sher Ali BAZ	Niaz Khan	NWA	EP TECH	8-4-20
53	Zia ullah	Abdul Hamid	NWA	Lab Asstt Against Physiotherapist	21-03-2010.
54	Asif	Yqoob	NWA	Lab Asstt Against	22-11-20

57	Safdar Ali	Dilawar Khan	NWA	Junior Clerk	06-0
58	Mansoor Ahmad	Qamar Ali	NWA	Junior Clerk	03-0
59	Jamil Ahmad	Nasib Akhtar	NWA	Junior Clerk	01-0
60	Muhammad Niaz	Nawshar Khan	NWA	Junior Clerk	03-0
61	Abdur Rehman	Zainullah	NWA	Malaria Inspector	23-0
62	Noor Ayub		NWA	EPI Tech	
63	Muhammad Tariq	Gul Zarooof	NWA	EPI Tech	
64	Zainullah	Madaraz	NWA	EPI Tech	29-0
65	Azmat ullah	Lair Jan	NWA	EPI Tech	
66	Abdullah	Aslam Khan	NWA	Sweeper	28-0
67	Nazullah Khan	Mather Khan	NWA	Behishty	10-0
68	Manoor Khan	Hajji Adil Mir	NWA	Sweeper	12-0
69	Asmad ud Din	Abdul Hakim	NWA	Mali	2-01
70	Din Faraz	Juma Gul	NWA	Cook	31-0

  
 AGENCY SURGEON  
 NORTH WAZIRISTAN MIRANSHA

OFFICE OF THE AGENCY SURGEON NORTH WAZIRISTAN MIRANSHAH.

Health Hospitals And Services: 0731-G.H.S. 073101-G.H.S. Demand: No. 111

AREAR BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE W.E FROM 01/07/2013 TO 31/10/2014=16-MONTHS).

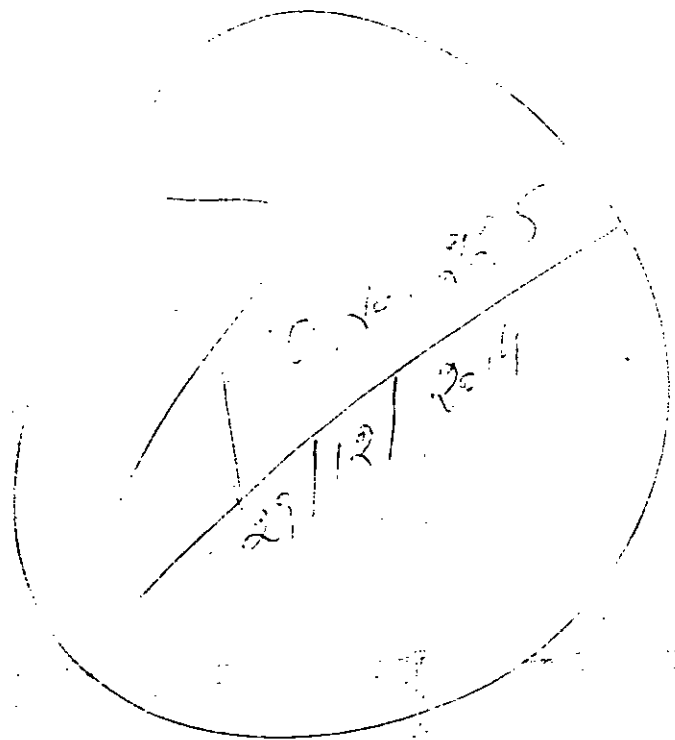
Dental Tech & Driver Working Against MTech:



and Lab Tech: EFS-9 & BPS-4

MW0031

S. No	Name	CATA GARY	AO115: Pay	1/7/2013 to 30/11/2013 5-Months= Due	Drawn	Diff:	Total	1/12/2013 to 31/10/2014 11-Months= Due	Drawn	Diff:	Total Grand Total
1	Fan Ali Shah Dental Tech: THQ Mir Ali	A	17600	2333	1722	851x5=4305/-	4305/-	2340	1760	880x11=9680	9680/- 13985/- ✓
2	Sahib Noor Driver BPS-4	A	9670	1445	964	482x5=2410	2410/-	1431	957	494x11=5434	5434/- 6865/- ✓
3	Abdul Nasir Lab Tech:	B	8860	1272	848	424x5=2120/-	2120/-	1329	885	443x11=4873	4873/- 6198/- ✓
4	Muhammad Zubair MT	A	8860	1272	848	424x5=2120/-	2120/-	1329	885	443x11=4873	4873/- 6198/- ✓
5	Samal Hussain Against MT	B	8450	1215	810	405x5=2025/-	2025/-	1272	845	424x11=4664	4664/- 6939/- ✓
6	Madood Ali Shah MT	A	7340	1044	696	348x5=1740/-	1740/-	1101	734	367x11=4037	4037/- 5138/- ✓
	<del>12</del>	B	17380	2532	1688	844x5=4220/-	4220/-	2307	1738	689x11=9559	9559/- 13779/- ✓
	<b>Total</b>		<b>78390</b>				<b>13940/-</b>				<b>43129/- 62060/- ✓</b>

CLASSIFICATION	AMOUNT
AR-15% NEW	92050
(00000) G.Total	62060
Deduction:	
Net Total:	92050


  
 25/12/2014

  
 AGENCY SURGEON  
 NORTH WAZIRISTAN MIRANSHAH  
  
  
 AGENCY SURGEON  
 NORTH WAZIRISTAN MIRANSHAH

R-2  
 T-132  
 9/12/2014

AREAR BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE V.E.FROM 01/07/2013 TO 31/10/2014=16-MONTHS).

TEMPERORY BILL  
MW0031

8136  
9/12/14

Name	CATA GARY	AO/151 Pay	1/7/2013 to 30/11/2013 5-Months= Due	Drawn	Diff:	Total	1/12-2013 to 31/10/2014 11-Months= Due	Drawn	Diff:	Total	Grand Total
Farooq Sana, Lab Tech Against D so RHO Software	B	7723	1107	734	367x5=1835/-	1835	1153	772	366x11=4026/-	4248/-	6083/-
Chahad Ullah Lab Technician Against LHV CH Bawa	A	7723	1107	734	367x5=1835/-	1835	1153	772	366x11=4026/-	4248/-	6083/-
Abdul Wahid Lab Technician Against LHV CH Hassan Khan	A	7723	1107	734	367x5=1835/-	1835	1153	772	366x11=4026/-	4248/-	6083/-
Sardar Ayaz EPI Technician Against LHV	A	7723	1107	734	367x5=1835/-	1835	1153	772	366x11=4026/-	4248/-	6083/-
Asad Noor Lab Technician Against LHV	A	7723	1107	734	367x5=1835/-	1835	1153	772	366x11=4026/-	4248/-	6083/-
Muzamud Chaudhry MT Against LHV	A	7723	1107	734	367x5=1835/-	1835	1153	772	366x11=4026/-	4248/-	6083/-
Shahidullah Meera supervisor against LHV	B	7340	1044	696	348x5=1740/-	1740	1131	734	367x11=4037/-	4037/-	5777/-
Wahidullah Malaria Supervisor against LHV	B	7340	1044	696	348x5=1740/-	1740	1131	734	367x11=4037/-	4037/-	5777/-
Total		61000				14490				33550/-	48040/-

CLASSIFICATION.	Amount.
AO-15% NEM	48040
(00000) G.Total	48040
Deductions:	0
Net Total:-	48040

Handwritten notes in a circle:  
 25/12/14  
 227  
 2:14

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

R-3 (9)

Acquittance roll for the month of August paid in Sept. 2

No.	Name	Net pay	Signature
1-	Ashraf Ali Khan.	14171	[Signature]
2-	Lal Mar Khan.	14171	[Signature]
3-	Saeed Noor.	14171	[Signature]
4-	Tanaz Mir.	14171	[Signature]
5-	Shah Muhammad.	14171	[Signature]
6-	Malang Jan.	14171	[Signature]
7-	Haji Akbar	14171	[Signature]
8-	Gul Rahman.	14191	[Signature]
9-	Panad Khan.	13502	[Signature]
10	Mahmudullah.	12926	[Signature]
11.	Mohd. Mohd.	13501	[Signature]
12.	Uzun Shahraz.	15370	[Signature]
13.	Nazimullah.	15370	[Signature]
14.	Mohd. Zafarullah.	14790	[Signature]
15.	Noorullah.	16599	[Signature]
16-	Sherin Taj.	14795	[Signature]
17	Kalboom Bibi.	14288	[Signature]
18.	Amir Afghani.	14986	[Signature]
19.	Zabiullah.	14986	[Signature]
20	Shah Zada.	14966	[Signature]
21	Zaminu-Ria.	14966	[Signature]
22	Azizullah.	14968	[Signature]
23.	Mohd. Sohail Khan.	15780	[Signature]
24	Muhammad Yusuf	15780	[Signature]
25.	Baleerullah.	15780	[Signature]
26.	Naimullah.	16809	[Signature]
27-	Shah Nawaz Khan.	15450	[Signature]
28-	Ahmadullah.	15450	[Signature]
29-	Shahnam Sivas.	17688	[Signature]
30-	Said Anwar.	17688	[Signature]
31	Panadullah.	17688	[Signature]
32	Azizullah.	17688	[Signature]
33-	Saima Gul.	17939	[Signature]
		11000	[Signature]

Agri-Union roll. For the month of August. (10)  
Paid in September

S.No.	Name	Net pay	Signature
35	Patil Lal Bah	16845	[Signature]
36	Zahidullah	14845	[Signature]
37	Mahd. Aslam	16339	[Signature]
38	Inayatullah	10339	[Signature]
39	Shafiqullah	16339	[Signature]
40	Noor-ul-Islam	15780	[Signature]
41	Mohd. Rahim	16334	[Signature]
42	Ishan Afzal	15809	[Signature]
43	Mohd Noor	15780	[Signature]
44	Pir Mohd Jan	15152	[Signature]
45	Mohd Yousof	15780	[Signature]
46	Saleemullah	15780	[Signature]
47	Arshad Afzal	15280	[Signature]
48	Wazir Mohd	16339	[Signature]
49	Taslimullah	15780	[Signature]
50	Noor pasham	16339	[Signature]
51	Aman yagub	16339	[Signature]
52	Noor Hakim	15780	[Signature]
53	Abdul Hanan	14750	[Signature]
54	Fazal wadood	15280	[Signature]
55	Nusrat Jahan	15809	[Signature]
56	Tajamullah	14750	[Signature]
57	Fari dullah	14750	[Signature]
58	Sham sul wahab	15250	[Signature]
59	Rhti Sham	15450	[Signature]
60	Jahanqir	14750	[Signature]
	Sajidullah	14231	[Signature]
61	Hashim parthvi	15736	[Signature]
62	Bishadullah	14236	[Signature]
63	Riaz Noor	14236	[Signature]
64	Satya bhar	13736	[Signature]
		Total	
		47-639	

R-4 (17)

مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔

مخبران - اصل برائے الزام (داد رسی) تنخواہیں دیکھنے کے لیے احکامات

مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔  
مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔  
مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔  
مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔

مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔  
مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔

مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔  
مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔

- ① مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔
- ② مقامی شہر میں رہنے والے ہیں اور وہاں کے لوگوں سے ملنے کے لیے درخواستیں دیا گیا ہے۔

D/S

Report Status  
of the case and  
reply immediately  
within 2 days

ایچ ایس ڈی  
1236  
01/03/14

01/03/14



R-1 (12)

**OFFICE OF THE AGENCY SURGOEN  
NORTH WAZIRISTAN AGENCY MIRANSHAH.  
PHONE & FAX: 0928-300788.**

NO **574** Date: Miranshah 18 : 03 2014

To

The Director Health Services,  
FATA Warsak Road Peshawar

No 2588  
18.03.14

Subject:  
Memo :

**COMPLAINT.**

Reference your office letter bearing endst. No.4213/DHS/FATA dated 12/03/2014 on the subject noted above. I have the honour to state that as per checking the record of this office there is no such record available of the officials individual concerned like their appointment orders, service books, health & age, even the dispatch register of that time.

However photo copies of their service books along with service appeals lodged them in Khyber Pakhtunkhwa Service Tribunal Peshawar against your good office as well as the of the undersigned, received through Mr. Akhtar Nawaz elder brother of Dr. Rahim Nawaz the then Agency Surgeon. This office has checked all the service books with the pay bills for the month of May, 2012. It has pointed out that there is a huge different between the pay fixed in their service books and pay / allowances drawn in the pay bills.

Keeping in view of the above it has also pointed out that their appointment orders were issued as a Malana Supervisor BPS-09 against the vacant post of LHVs and Dispensers during ban period with out advertisement / conducting of proper interview. It is a main cause for withdrawal of their names from monthly pay bills by Dr. Azam Wazir, Ex-Agency Surgeon w.e.f from 01/09/2012.

Report is submitted for further necessary action as desired please.



Agency Surgeon  
North Waziristan Miranshah.

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

Service Appeal No. 703 /2013

*Mr. Zabihullah* VS Director Health (FATA) & anthers:

**REJOINDER ON BEHALF OF APPELLANT**

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee. Moreover, the appellant attached Service Book with the appeal, wherein page 4 A it is clearly mentioned that the appellant was appointed on dated 31-12-2011
- 2 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant, which is evident from performance certificate which is attached with the appeal.
- 3 Incorrect. The appellant has paid salary up to August 2012 by the concerned official. (Copy of salary slip of August 2012 is attached as Annexure- R3)

- 4 Incorrect. The appellant has filed departmental appeal which is attached as D on page 6 with main appeal. Besides that the appellant and other colleagues had also filed a joint application /appeal which was properly endorsed and reported back by the concerned office. The denial of the respondents is thus not tenable mere by denying that fact. *(Copy of joint appeal and report back by the concerned office are attached as R1 & R2).*

**GROUND:**

- A- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official and after September 2012 stoppage of monthly salaries of the appellant and not taking action on the departmental appeal of the appellant is against the law, rules, norms of justice and material on record. Therefore not tenable and liable to be set aside.
- B- Incorrect. While para B of the appeal is correct.
- C- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official. Therefore the appellant is entitled for salaries after September 2012 till date as the appellant is still in service and has not been terminated so for.
- D- Incorrect. While para D of the appeal is correct.
- E- Incorrect. While para E of the appeal is correct.
- F- Not replied according to para F of the appeal. Moreover para F of the appeal is correct.
- G- No comments.

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

*Zabeerullah*  
APPELLANT

Through:

*M. Asif Yousafzai*  
( M. ASIF YOUSAFZAI )  
ADVOCATE, PESHAWAR.  
&

(TAIMUR ALI KHAN)  
ADVOCATE, PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

*Zabeerullah*  
DEPONENT

R1 (4)

OFFICE OF THE AGENCY SURGOEN NORTH WAZIRISTAN MIRANSHAH.

PHONE & FAX; 0928-300788.

NO 2801 / DATED: MIRANSHAH THE 30/9 /2011.

To The Director Health Services.  
FATA Warsak Road Peshawar.

SUBJECT: APPOINTMENT DURING THE LAST THREE(3) YEARS.

Memo: Reference your Telephonic Message to day on 30-09-2011.

I have the honour to submit herewith the detail list of appointment during the last three years as follows.

S.NO	NAME	F:/NAME	Domicile	Designation	Date of Arrival
1	Mr. Khaista Rehman	Fateh Said	Bajaur	Medical Tech	3-11-2009
2	Mr. Shaheed Ullah Jan	Jan Behader	NWA	Medical Tech	03-11-2009
3	Mr. Zahid Iqbal	Banat Khan	NWA	Medical Tech	3-11-2009
4	Mr. Akhtar Ayub	Janabat Khan	NWA	Medical Tech	3-11-2009
5	Mr. Safder Elahi	Noor Elahi	NWA	Medical Tech	3-11-2009
6	Mr. Arifullah	Khushal Khan	NWA	Medical Tech	06-12-2009
7	Mr. Naveed Iqbal	Khan Behader	NWA	Medical Tech	12-11-2009
8	Mr. Wadood Ali Shah	Muhammad Nawaz Shah	Bannu	Medical Tech	10-01-2010
9	Mr. Farhad Ullah	Made Jan	NWA	Medical Tech	18-06-2010
10	Mr. Shahid ullah	Muhammad Nawaz	NWA	Dispenser	3-11-2009
11	Mr. Abdul Hanan	Gul Faraz Khan	Bajuar	Dispenser	
12	Mr. Zaheer ud Din	Noor Adil Shah	NWA	Diepsenser	3-11-2009
13	Mr. Inam Ullah	Shahadat Khan	NWA	Dispenser	22-11-2009
14	Namat Rasool	Azad Khan	NWA	Dispenser	25-03-2010
15	Mr. Nazeer Ahmad	Muhammad Younas	Bajaur	Dispenser	20-12-2009
16	Mr. Muhammad Qasim (ADP)	Muhammad Zuman	NWA	Dispenser	22-11-2009
17	Mr. Sayed Nawaz (ADP)	Sahed Nawaz	NWA	Dispenser	18-11-2009
18	Mr. Habib ullah (ADP)	Ber Mullah Khan	NWA	Dispenser	22-11-2009
19	Mr. Imran Ullah (ADP)	Muhammad Niaz	NWA	Diepsenser	24-11-2009
20	Mr. Muhammad Zunir (ADP)	Noor Madat Khan	NWA	Dispenser	06-11-2009
21	Mr. Muhammad Akram (ADP)	Muhammad Saleem Shah	NWA	Dispenser Adjusted Against LHV in ADP	06-11-2009
22	Mr. Rafi Ullah (ADP)	Mir Sahab Khan	NWA	Dispenser Adjusted Against LHV in ADP	15-11-2009

3	Mustafa Khan (ADP)	Rashid Khan	NWA	Dispenser Adjusted Against LHV in ADP	25-12-20
24	Hafiz Noor (ADP)	Sayed Manoor	NWA	Dispenser Adjusted Against LHV in ADP	1-1-2010
25	Miss. Basnoor Bibi	Samin Ullah	Bnnu	LHV	12-11-20
26	Miss. Tabsuam	Gul Naib Khan	Bannu	LHV	15-11-20
27	Miss Husai	Adil Khan	NWA	LHV	15-11-20
28	Miss. Zubida Khanam	Kari mud Din	D.I. KHAN	LHV	19-12-20
29	Miss. Komal Saba	Palol Khan	NWA	LHV	23-12-20
30	Miss: Romana Akram	Muhammad Akram	D.I.Khan	LHV	23-12-20
31	Faiqa	Habib Ullah	Bannu	LHV	31-12-20
32	Zar Taj	Hukam Zada	Bannu	LHV	6-1-2010
33	Miss Permeen Gul	Gul Shah Zada	BANNU	LHV	30-1-20
34	Miss. Nasima Bibi	Noor Bad Shah	Bannu	LHV	20-02-20
35	Miss Zakishah	Din Bad Shah	NWA	LHV	18-06-20
36	Miss. Waheeda LHV	Aman ullah	NWA	LHV	2-6-2010
37	Mr. Attaur Rehman	Wali Muhammad	NWA	Assistant Superintendent Malaria	25-06-2010.
38	Mr. Sajid Khan	Murad Ali	NWA	Dental Tech	18-11-20
39	Mr. Feroz Shah	Hakim Shah	NWA	Lab Asstt Against Dispense	18-11-20
40	Sayel Khan	Zarbab Khan	NWA	EPI Tech Against LHV	12-11-20
41	Mr. Asif Mehmood	Taj Muhammad	NWA	X-Ray Against LHV	3-12-20
42	Mr. Sabghat ullah	Zaffar Ali	NWA	Lab Tech Against LHV	3-12-20
43	Sardar Ayub	Ayub Khan	NWA	EPI Tech Against LHV	6-12-20
44	Mr. Khatib Ullah	Saeed Khan	NWA	EPI Tech Against TSV	3-12-20
45	Mr. Gul Rehman	Inayat Khan	NWA	Dispenser Against LHV	10-12-20
46	Mr. Salim ullah	Hanif ullah	NWA	Lab Asstt Against ECG	17-12-20
47	Mr. Shahid Ullah	Muhammad Noor Gul	NWA	Lab Asstt Against LHV	25-12-20
48	Mr. Noor Hayat	Salim Muhammad	NWA	Dispenser Against LHV	15-01-20
49	Mr. Ajab Noor	Shaniaraz	NWA	Lab Astt Against LHV	2-4-20
50	Mr. Niazam ud Din	Fazal Ghani	NWA	MT Against LHV	2-4-20
52	Sher Ali BAZ	Niaz Khan	NWA	EP TECH	8-4-20
53	Zia ullah	Abdul Hamid	NWA	Lab Asstt Against Physiotherapist	21-03-2010.
54	Asif	Yqoob	NWA	Lab Asstt Against	22-11-20

57	Safdar Ali	Dilawar Khan	NWA	Junior Clerk	06-0
58	Mansoor Ahmad	Qamar Ali	NWA	Junior Clerk	03-0
59	Jamil Ahmad	Nasib Akhtar	NWA	Junior Clerk	01-0
60	Muhammad Niaz	Nawshar Khan	NWA	Junior Clerk	03-0
61	Abdur Rehman	Zainullah	NWA	Malaria Inspector	23-0
62	Noor Ayub		NWA	EPI Tech	
63	Muhammad Tariq	Gul Zarooof	NWA	EPI Tech	
64	Zainullah	Madaraz	NWA	EPI Tech	29-0
65	Azmat ullah	Lair Jan	NWA	EPI Tech	
66	Abdullah	Aslam Khan	NWA	Sweeper	28-0
67	Nazullah Khan	Mather Khan	NWA	Behishty	10-0
68	Manoor Khan	Hajji Adil Mir	NWA	Sweeper	12-0
69	Asmad ud Din	Abdul Hakim	NWA	Mali	2-01
70	Din Faraz	Juma Gul	NWA	Cook	31-0

  
 AGENCY SURGEON  
 NORTH WAZIRISTAN MIRANSHA

OFFICE OF THE AGENCY SURGEON NORTH WAZIRISTAN MIRANSHAH.

07-Health Hospitals And Services: 0731-G.H.S. :073101-G.H.S. Demand:No.111

PREPARE BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE W.E.FROM 01/07/2013 TO 31/10/2014=16-MONTHS).

R-2 T-132  
29/12/14

MW0031

S. No	Name	CATA GARY	AO1151 Pay	17/2013 to 30/11/2013 5-Months= Due	Drawn	Diff	Total	11/10/2013 to 31/10/2014 11-Months= Due	Drawn	Diff	Total	Grand Total
1	Mir Ali Shah Dental Tech:THQ Mir Ali	A	17600	2533	1722	861x5=4305/-	4305/-	2640	1760	680x11=6880	6880	13985/-
2	Sahib Noor Driver BPS-4	A	9670	1445	964	482x5=2410	2410/-	1431	987	484x11=5434	5434	7244/-
3	Abdul Nasir Lab: Tech:	B	8860	1272	848	424x5=2120/-	2120/-	1329	888	443x11=4873	4873	6893/-
4	Muhammad Zubair MT	A	8860	1272	848	424x5=2120/-	2120/-	1329	888	443x11=4873	4873	6893/-
5	Kamal Hussain Against MT	B	8430	1215	810	405x5=2025/-	2025/-	1272	848	424x11=4664	4664	6889/-
6	Masood Ali Shah MT	A	7340	1044	696	348x5=1740/-	1740/-	1101	734	367x11=4037	4037	5777/-
	<del>1</del>	B	17380	2532	1688	844x5=4220/-	4220/-	2607	1738	869x11=9559	9559	13779/-
	Total		78390				13940/-				43129/-	62060/-

CLASSIFICATION	Amount
AR-15% NEW	62060
(02000) G.Total	62060
Deduction:	0
Net Total:	62060

Handwritten circular stamp with text: 29/12/14

AGENCY SURGEON  
NORTH WAZIRISTAN MIRANSHAH

AGENCY SURGEON  
NORTH WAZIRISTAN MIRANSHAH



AREAR BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE W.E.F FROM 01/07/2013 TO 31/10/2014=16 MONTHS).

TEMPERORY BILL  
MWO031

Name	CATA GARY	AO:151 Pay	1/7/2013 to 30/11/2013 5-Months Due	Drawn	Diff:	Total	1/12/2013 to 31/10/2014 11-Months Due	Drawn	Diff:	Total	Grand Total	
Feroz Shah Lab Tech. Against Disp. RHO Software	B	7700	1100	734	367x5=1835	1835	1159	772	386	11=4248	4248	6083
Muhammad Usaf Lab Technician Against LHV CH Boya	A	7700	1100	734	367x5=1835	1835	1159	772	386	11=4248	4248	6083
Muhammad Usaf Lab Technician Against LHV CH Hasou Khan	A	7700	1100	734	367x5=1835	1835	1159	772	386	11=4248	4248	6083
Muhammad Usaf EPI Technician Against LHV	A	7700	1100	734	367x5=1835	1835	1159	772	386	11=4248	4248	6083
Muhammad Usaf Technician Against LHV	A	7700	1100	734	367x5=1835	1835	1159	772	386	11=4248	4248	6083
Muhammad Usaf MT Against LHV	A	7700	1100	734	367x5=1835	1835	1159	772	386	11=4248	4248	6083
Shahzad Miana supervisor against LHV	B	7340	1044	696	348x5=1740	1740	1101	734	367	11=4037	4037	5777
Muhammad Usaf Malaria Supervisor against LHV	B	7340	1044	696	348x5=1740	1740	1101	734	367	11=4037	4037	5777
Total		61000				14490				33550	48040	

136  
9/12/2014

CLASSIFICATION.	Amount.
AO-15% NEW	48040
(00000) G.Total	48040
Deduction:	0
Net Total:	48040

25/12/2014  
227

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

R-3 ⑨

Acquittance roll for the month of August paid in Sept. 2

No.	Name	Net pay	Signature
1-	Ashraf Ali Khan.	14171	[Signature]
2-	Lal Mar Jahan.	14171	[Signature]
3-	Saeed Noor.	14171	[Signature]
4-	Tanat Mir.	14171	[Signature]
5-	Shah Muhammad.	14171	[Signature]
6-	Malang Jan.	14171	[Signature]
7-	Haji Akbar	14171	[Signature]
8-	Gul Rehman.	14191	[Signature]
9-	Panad Khan.	13502	[Signature]
10	Mahmudullah.	12926	[Signature]
11.	Mohd Mohd.	13501	[Signature]
12.	Urm Shahraz.	15371	[Signature]
12.	Nasirullah.	15370	[Signature]
14.	Mohd Zafullah.	14790	[Signature]
15.	Noorullah.	1659	[Signature]
16-	Sherin Taj.	14985	[Signature]
17	Kaloon Bibi.	14266	[Signature]
18.	Amin Afghar.	14986	[Signature]
19.	Zabiullah.	14986	[Signature]
20.	Shah Zada.	14966	[Signature]
21.	Fazila - Rii.	14966	[Signature]
22.	Azizullah.	14966	[Signature]
23.	Mohd Sohail Khan.	15780	[Signature]
24.	Mohd Yusof.	15780	[Signature]
25.	Baleerullah.	15780	[Signature]
26.	Naimullah.	16009	[Signature]
27-	Shah Nawaz Khan.	15450	[Signature]
28-	Ahmadullah.	15450	[Signature]
29-	Shabnam Jirab.	17668	[Signature]
30-	Said Anwar.	17668	[Signature]
31.	Pardadullah.	17668	[Signature]
32.	Azizullah.	17668	[Signature]
33.	Saima Gul.	17939	[Signature]
		12020	

Aganithana roll. For the month of August. (10)  
 Paid in Sept. 22

S No.	Name	Net pay	Signature
35	Ratullah	16845	[Signature]
36	Zahidullah	14845	Zahid
37	Mohd. Aslam	16339	M. Aslam
38	Inayatullah	10339	[Signature]
39	Shafiqullah	16339	Shafiqullah
40	Noor-ul-Islam	15780	Noor K
41	Mohd. Rahim	16334	M. Rahim
42	Ishan Afzal	15809	[Signature]
43	Mohd Noor	15780	M. Noor
44	Pir Mohd Jan	15152	[Signature]
45	Mohd Yousof	15780	M. Yousof
46	Saleemullah	15780	Saleem
47	Arshad Afzal	15280	Arshad
48	Wazim Mohd.	16339	Wazim M
49	Taskeenullah	15780	[Signature]
50	Noor pasham	16339	Noor Pasham
51	Aman Yaqoob	16839	Aman Y
52	Noor Hakim	15780	Noor Hakim
53	Abdul Haman	14131	[Signature]
54	Fazal wadood	15280	Fazal W
55	Nusrat Jahan	15800	Nusrat
56	Zafarullah	14750	Zafar
57	Fari dullah	14750	[Signature]
58	Sham sul wabab	15350	Sham S
59	Rhti Sham	15450	[Signature]
60	Jahangir	14750	Jahangir
	Sajidullah	14231	Sajid
61	Hakim pasha	15723	Hakim
61	Bisha dullah	14236	[Signature]
62	Riaz Noor	14236	Riaz
63	Safarullah	13736	[Signature]

Total 477659



R-5 (12)

**OFFICE OF THE AGENCY SURGOEN  
NORTH WAZIRISTAN AGENCY MIRANSHAH.  
PHONE & FAX: 0928-300788.**

NO 574 Date: 18 / 03 / 2014

To  
The Director Health Services,  
FATA Warsak Road Peshawar

Handwritten stamp: No. 2588 / 18.03.14


Subject: COMPLAINT.  
Memo :

Reference your office letter bearing endst. No.4213/DHS/FATA dated 12/03/2014 on the subject noted above. I have the honour to state that as per checking the record of this office there is no such record available of the officials individual concerned like their appointment orders, service books, health & age, even the dispatch register of that time

However photo copies of their service books along with service appeals lodged them in Khyber Pakhtunkhwa Service Tribunal Peshawar against your good office as well as the of the undersigned, received through Mr. Akhtar Nawaz elder brother of Dr Rahim Nawaz the then Agency Surgeon. This office has checked all the service books with the pay bills for the month of May.2012. It has pointed out that there is a huge different between the pay fixed in their service books and pay / allowances drawn in the pay bills.

Keeping in view of the above it has also pointed out that their appointment orders were issued as a Malania Supervisor BPS-09 against the vacant post of LHVs and Dispensers during ban period without advertisement / conducting of proper interview. It is a main cause for withdrawing their names from monthly pay bills by Dr Azam Wazir, Ex-Agency Surgeon w.e. from 01/09/2012.

Report is submitted for further necessary action as desired please.

  
Agency Surgeon  
North Waziristan Miranshah.

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

Service Appeal No. 703- /2013

*Mr. Zabihullah* VS Director Health (FATA) & anthers:

.....  
**REJOINDER ON BEHALF OF APPELLANT**  
.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee. Moreover, the appellant attached Service Book with the appeal, wherein page 4 A it is clearly mentioned that the appellant was appointed on dated 31-12-2011
- 2 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant, which is evident from performance certificate which is attached with the appeal.
- 3 Incorrect. The appellant has paid salary up to August 2012 by the concerned official. (Copy of salary slip of August 2012 is attached as Annexure- R3)

- 4 Incorrect. The appellant has filed departmental appeal which is attached as D on page 6 with main appeal. Besides that the appellant and other colleagues had also filed a joint application / appeal which was properly endorsed and reported back by the concerned office. The denial of the respondents is thus not tenable mere by denying that fact. *(Copy of joint appeal and report back by the concerned office are attached as R1 & R2).*

**GROUNDS:**

- A- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official and after September 2012 stoppage of monthly salaries of the appellant and not taking action on the departmental appeal of the appellant is against the law, rules, norms of justice and material on record. Therefore not tenable and liable to be set aside.
- B- Incorrect. While para B of the appeal is correct.
- C- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official. Therefore the appellant is entitled for salaries after September 2012 till date as the appellant is still in service and has not been terminated so for.
- D- Incorrect. While para D of the appeal is correct.
- E- Incorrect. While para E of the appeal is correct.
- F- Not replied according to para F of the appeal. Moreover para F of the appeal is correct.
- G- No comments.

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

*Zabirullah*  
APPELLANT

Through:

*M. Asif Yousafzai*  
( M. ASIF YOUSAFZAI )  
ADVOCATE, PESHAWAR.  
&

(TAIMUR ALI KHAN)  
ADVOCATE, PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

*Zabirullah*  
DEPONENT



R1 (4)

OFFICE OF THE AGENCY SURGOEN NORTH WAZIRISTAN MIRANSHAH.

PHONE & FAX: 0928-300788.

NO 2801 / DATED: MIRANSHAH THE 30/9 /2011.

To The Director Health Services.  
FATA Warsak Road Peshawar.

SUBJECT: APPOINTMENT DURING THE LAST THREE(3) YEARS.

Memo: Reference your Telephonic Message to day on 30-09-2011.

I have the honour to submit herewith the detail list of appointment during the last three years as follows.

S.NO	NAME	F:/NAME	Domicile	Designation	Date of Arrival
1	Mr. Khaista Rehman	Fateh Said	Bajaur	Medical Tech	3-11-2009
2	Mr. Shaheed Ullah Jan	Jan Behader	NWA	Medical Tech	03-11-2009
3	Mr. Zahid Iqbal	Banat Khan	NWA	Medical Tech	3-11-2009
4	Mr. Akhtar Ayub	Janabat Khan	NWA	Medical Tech	3-11-2009
5	Mr. Safder Elahi	Noor Elahi	NWA	Medical Tech	3-11-2009
6	Mr. Arifullah	Khushal Khan	NWA	Medical Tech	06-12-2009
7	Mr. Naveed Iqbal	Khan Behader	NWA	Medical Tech	12-11-2009
8	Mr. Wadood Ali Shah	Muhammad Nawaz Shah	Bannu	Medical Tech	10-01-2010
9	Mr. Farhad Ullah	Made Jan	NWA	Medical Tech	18-06-2010
10	Mr. Shahid ullah	Muhammad Nawaz	NWA	Dispenser	3-11-2009
11	Mr. Abdul Hanan	Gul Faraz Khan	Bajuar	Dispenser	
12	Mr. Zaheer ud Din	Noor Adil Shah	NWA	Diepsenser	3-11-2009
13	Mr. Inam Ullah	Shahadat Khan	NWA	Dispenser	22-11-2009
14	Namat Rasool	Azad Khan	NWA	Dispenser	25-03-2010
15	Mr. Nazeer Ahmad	Muhammad Younas	Bajaur	Dispenser	20-12-2009
16	Mr. Muhammad Qasim (ADP)	Muhammad Zuman	NWA	Dispenser	22-11-2009
17	Mr. Sayed Nawaz (ADP)	Sahed Nawaz	NWA	Dispenser	18-11-2009
18	Mr. Habib ullah (ADP)	Ber Mullah Khan	NWA	Dispenser	22-11-2009
19	Mr. Imran Ullah (ADP)	Muhammad Niaz	NWA	Diepsenser	24-11-2009
20	Mr. Muhammad Zunir (ADP)	Noor Madat Khan	NWA	Dispenser	06-11-2009
21	Mr. Muhammad Akram (ADP)	Muhammad Saleem Shah	NWA	Dispenser Adjusted Against LHV in ADP	06-11-2009
22	Mr. Rafi Ullah (ADP)	Mir Sahab Khan	NWA	Dispenser Adjusted Against LHV in ADP	15-11-2009

5

3	Mustafa Khan (ADP)	Rashid Khan	NWA	Dispenser Adjusted Against LHV in ADP	25-12-20
24	Hafiz Noor (ADP)	Sayed Manoor	NWA	Dispenser Adjusted Against LHV in ADP	1-1-2010
25	Miss. Basnoor Bibi	Samin Ullah	Bannu	LHV	12-11-20
26	Miss. Tabsuam	Gul Naib Khan	Bannu	LHV	15-11-20
27	Miss Husai	Adil Khan	NWA	LHV	15-11-20
28	Miss. Zubida Khanam	Kari mud Din	D.I. KHAN	LHV	19-12-20
29	Miss. Komal Saba	Palol Khan	NWA	LHV	23-12-20
30	Miss: Romana Akram	Muhammad Akram	D.I.Khan	LHV	23-12-20
31	Faiqa	Habib Ullah	Bannu	LHV	31-12-20
32	Zar Taj	Hukam Zada	Bannu	LHV	6-1-201
33	Miss Permeen Gul	Gul Shah Zada	BANNU	LHV	30-1-20
34	Miss. Nasima Bibi	Noor Bad Shah	Bannu	LHV	20-02-2
35	Miss Zakishah	Din Bad Shah	NWA	LHV	18-06-2
36	Miss. Waheeda LHV	Aman ullah	NWA	LHV	2-6-201
37	Mr. Attaur Rehman	Wali Muhammad	NWA	Assistant Superintendent Malaria	25-06-2010.
38	Mr. Sajid Khan	Murad Ali	NWA	Dental Tech	18-11-2
39	Mr. Feroz Shah	Hakim Shah	NWA	Lab Asstt Against Dispense	18-11-2
40	Sayel Khan	Zarbab Khan	NWA	EPI Tech Against LHV	12-11-2
41	Mr. Asif Mehmood	Taj Muhammad	NWA	X-Ray Against LHV	3-12-20
42	Mr. Sabghat ullah	Zaffar Ali	NWA	Lab Tech Against LHV	3-12-20
43	Sardar Ayub	Ayub Khan	NWA	EPI Tech Against LHV	6-12-20
44	Mr. Khatib Ullah	Saeed Khan	NWA	EPI Tech Against LSV	3-12-20
45	Mr. Gul Rehman	Inayat Khan	NWA	Dispenser Against LHV	10-12-
46	Mr. Salim ullah	Hanif ullah	NWA	Lab Asstt Against ECG	17-12-
47	Mr. Shahid Ullah	Muhammad Noor Gul	NWA	Lab Asstt Against LHV	25-12-
48	Mr. Noor Hayat	Salim Muhammad	NWA	Dispenser Against LHV	15-01-
49	Mr. Ajab Noor	Shamaraz	NWA	Lab Astt Against LHV	2-4-20
50	Mr. Niazam ud Din	Fazal Ghani	NWA	MT Against LHV	2-4-20
52	Sher Ali BAZ	Niaz Khan	NWA	EP TECH	8-4-20
53	Zia ullah	Abdul Hamid	NWA	Lab Asstt Against Physiotherapist	21-03-2010.
54	Asif	Yqoob	NWA	Lab Asstt Against	22-11-

57	Safdar Ali	Dilawar Khan	NWA	Junior Clerk	06-0
58	Mansoor Ahmad	Qamar Ali	NWA	Junior Clerk	03-0
59	Jamil Ahmad	Nasib Akhtar	NWA	Junior Clerk	01-0
60	Muhammad Niaz	Nawshar Khan	NWA	Junior Clerk	03-0
61	Abdur Rehman	Zainullah	NWA	Malaria Inspector	23-0
62	Noor Ayub		NWA	EPI Tech	
63	Muhammad Tariq	Gul Zarooof	NWA	EPI Tech	
64	Zainullah	Madaraz	NWA	EPI Tech	29-0
65	Azmat ullah	Lair Jan	NWA	EPI Tech	
66	Abdullah	Aslam Khan	NWA	Sweeper	28-0
67	Nazullah Khan	Mather Khan	NWA	Behishty	10-0
68	Manoor Khan	Hajji Adil Mir	NWA	Sweeper	12-0
69	Asmad ud Din	Abdul Hakim	NWA	Mali	2-01
70	Din Faraz	Juma Gul	NWA	Cook	31-0

  
 AGENCY SURGEON  
 NORTH WAZIRISTAN MIRANSHA



AREAR BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE W.E.FROM 01/07/2013 TO 31/10/2014=16-MONTHS).

TEMPERORY BILL  
MW0031

Sl. No.	Name	CATA GARY	1/7/2013 to 30/10/2013			1/12/2013 to 31/10/2014			Grand Total			
			AO:151 Pay	Drawn	Diff:	Total	Drawn	Diff:		Total		
1	Farooq Shah Lab Tech: Against Disp. RHC Sorhram	B	7700	1101	734	367x5=1835/-	1835	1153	772	365x11=4245/-	4245	6080/-
2	Chahed Ullah Lab Technician Against LHV CH Boya	A	7700	1101	734	367x5=1835/-	1835	1153	772	365x11=4245/-	4245	6080/-
3	Shahid Ullah Lab Technician Against LHV CH Hassan Khat	A	7700	1101	734	367x5=1835/-	1835	1153	772	365x11=4245/-	4245	6080/-
4	Sardar Ayub EPI Technician Against LHV	A	7700	1101	734	367x5=1835/-	1835	1153	772	365x11=4245/-	4245	6080/-
5	Asad Noor Lab Technician Against LHV	A	7700	1101	734	367x5=1835/-	1835	1153	772	365x11=4245/-	4245	6080/-
6	Muzamud D. MIT Against LHV	A	7700	1101	734	367x5=1835/-	1835	1153	772	365x11=4245/-	4245	6080/-
7	Shahid Ullah ana supervisor against LHV	B	7340	1044	695	348x5=1740/-	1740	1101	734	367x11=4037/-	4037	5777/-
8	Wahed Ullah Malaria Supervisor against LHV	B	7340	1044	695	348x5=1740/-	1740	1101	734	367x11=4037/-	4037	5777/-
Total			61000				14490			33550/-		48040/-

8136  
9/12/2014

CLASSIFICATION.	Amount.
AO-15% NEW	48040
(00000) G.Total	48040
Deductions:	0
Net Total:-	48040

25/12/2014  
227

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

Acquittance roll for the month of August paid in Sept. 2

No.	Name	Net pay	Signature
1-	Ashraf Ali Khan.	14171	[Signature]
2-	Lal Mar Khan.	14171	[Signature]
3-	Saeed Noor.	14171	[Signature]
4-	Tanaz Mir.	14171	[Signature]
5-	Shah Muhammad.	14171	[Signature]
6-	Malang Jan.	14171	[Signature]
7-	Haji Akbar	14171	[Signature]
8-	Gul Rehman.	14191	[Signature]
9-	Panad Khan.	13502	[Signature]
10	Mahmudullah.	12926	[Signature]
11.	Mohd. Mohd.	13501	[Signature]
12.	Uam Shahraz.	15378	[Signature]
13.	Nazimullah.	15370	[Signature]
14.	Mohd. Zafarullah.	14790	[Signature]
15.	Noorullah.	16539	[Signature]
16-	Sherin Taj.	14795	[Signature]
17	Kalboom Bibi.	14288.	[Signature]
18.	Amin Afghani.	14986.	[Signature]
19.	Zabirullah.	14286.	[Signature]
20	Shah Zada.	14966	[Signature]
21	Zaminu-Rin.	14966	[Signature]
22	Azizullah.	14966.	[Signature]
23.	Mohd. Sohail Khan.	15780	[Signature]
24	Muhammad Yusuf	15780	[Signature]
25.	Balcomullah.	15780.	[Signature]
26.	Naimullah.	16809.	[Signature]
27-	Shah Nawaz Khan.	15450	[Signature]
28-	Ahmadullah.	15450	[Signature]
29-	Shabnam Simab.	17688.	[Signature]
30-	Said Anwar.	17688.	[Signature]
31	Panadullah.	17688.	[Signature]
32-	Azizullah.	17688.	[Signature]
33-	Saima Gul.	17939.	[Signature]
		17000	[Signature]

Agri-Hank roll. For the month of August. (10)  
Paid in Sept 22

S No.	Name.	Net pay.	Signature
35	Patillah.	14845.	[Signature]
36	Zahidullah.	14845.	[Signature]
37	Muhamd. Aslam.	16339.	Mr. Aslam
38	Inayatullah.	16339.	[Signature]
39	Shafiqullah.	16339.	Shafiqullah
40	Noor-ul-Islam.	15780.	Noor-ul-Islam
41	Muhamd. Rahim.	16334.	M. Rahim
42	Ishan Afzal.	15809.	[Signature]
43	Muhamd Noor.	15780.	M. Noor
44	Pir Muhamd Jan.	15152.	[Signature]
45	Muhamd Yousaf.	15780.	[Signature]
46	Saleemullah.	15780.	Saleem
47	Arshad Afzal.	15280.	Arshad
48	Wazim Muhamd.	16339.	[Signature]
49	Taskeenullah.	16339.	[Signature]
50	Noor Pakistan.	16339.	Abdullah
51	Aman Yaqoob.	16339.	[Signature]
52	Noor Hakim.	15730.	Noor Hakim
53	Abdul Hanan.	14131.	[Signature]
54	Fazal Wadood.	15280.	[Signature]
55	Nusrat Jahan.	15800.	Nusrat
56	Zafarullah.	14750.	Zafar
57	Fariqullah.	14750.	[Signature]
58	Sham sul Wahab.	15250.	[Signature]
59	Rishi Sham.	15450.	[Signature]
60	Jahangir.	14750.	Jahangir
	Sajjadullah.	14236.	Sajjad
61	Hussein Parviz.	15730.	[Signature]
62	Bishwajit Lal.	14236.	[Signature]
63	Rizq Noor.	14236.	[Signature]
	Safarullah.	13736.	[Signature]

Total: 477559

R-4 (1)

مقامی سیکریٹری سٹیٹ سیکریٹریٹ فیڈریشن سیکریٹری اور سیکریٹری سٹیٹ سیکریٹریٹ

مخبرہ:- ایس اے ایف ایف (اداریہ) تنخواہیں سیکریٹریٹ کے اہلکاروں کے

مقامی سیکریٹریٹ! تیار ہونے کی وجہ سے کہ ایک ایسے سرکاری ادارے میں لکھنؤ کے  
کے نوکری بند کرنے کی وجہ سے اس کے سب سے زیادہ اور سب سے زیادہ بڑوں  
کو سب سے زیادہ نقصان پہنچا ہے۔ یہ نہ ٹرمینٹ کیا گیا ہے۔ اس کے نتیجے میں  
اس کے سب سے زیادہ گار اور غریب سرکاری نوکریوں اور دیگر سال سے زیادہ عرصے سے  
تعمیرات کے محنتوں کے حکمرانوں کے ہیں، لیکن اسے تک کوئی شمولیت نہیں  
ہوئی ہے۔

لہذا اس خطاب کی وجہ سے اسے اس کے نتیجے میں سیکریٹریٹ کے اہلکاروں  
تعلقہ AS 10074 کو جاری فرمائیں اور اس کے ساتھ ساتھ اس کے اہلکاروں کے

ایس اے ایف ایف  
S. S. S. S.  
سرزادہ خان وغیرہ  
ایس اے ایف ایف (25)

- 1) ایس اے ایف ایف کے اہلکاروں کے
- 2) ایس اے ایف ایف کے اہلکاروں کے

D/S Report Status  
of the case and  
reply immediately promised  
2 days  
10/3/14

atv SSD  
9336  
11/11/14



R-S (12)

**OFFICE OF THE AGENCY SURGOEN  
NORTH WAZIRISTAN AGENCY MIRANSHAH  
PHONE & FAX: 0928-300788.**

NO **574** Date: Miranshah the **18** : 03 2014

To The Director Health Services,  
FATA Warsak Road Peshawar

No. 2588  
18.03.14


Subject: **COMPLAINT.**  
Memo :

Reference your official letter bearing endst. No.4213/DHS/FATA dated 12/03/2014 on the subject noted above. I have the honour to state that as per checking the record of this office there is no such record available of the officials individual concerned like their appointment orders, service books, health & age, even the dispatch register of that time

However photo copies of their service books along with service appeals lodged them in Khyber Pakhtunkhwa Service Tribunal Peshawar against your good office as well as the of the undersigned, received through Mr. Akhtar Nawaz elder brother of Dr. Rahim Nawaz the then Agency Surgeon. This office has checked all the service books with the pay bills for the month of May, 2012. It has pointed out that there is a huge different between the pay fixed in their service books and pay / allowances drawn in the pay bills.

Keeping in view of the above it has also pointed out that their appointment orders were issued as a Malania Supervisor BPS-09 against the vacant post of LHVs and Dispensers during ban period with out advertisement / conducting of proper interview. It is a main cause for withdrawing their names from monthly pay bills by Dr. Azam Wazir, Ex-Agency Surgeon w.e.f from 01/09/2012.

Report is submitted for further necessary action as desired, please.

  
Agency Surgeon  
North Waziristan Miranshah.

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

Service Appeal No. 703 /2013

*Mr. Zabihullah* VS Director Health (FATA) & anthers:

**REJOINDER ON BEHALF OF APPELLANT**

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee. Moreover, the appellant attached Service Book with the appeal, wherein page 4 A it is clearly mentioned that the appellant was appointed on dated 31-12-2011
- 2 Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-2011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant, which is evident from performance certificate which is attached with the appeal.
- 3 Incorrect. The appellant has paid salary up to August 2012 by the concerned official. (Copy of salary slip of August 2012 is attached as Annexure- R3)

- 4 Incorrect. The appellant has filed departmental appeal which is attached as D on page 6 with main appeal. Besides that the appellant and other colleagues had also filed a joint application /appeal which was properly endorsed and reported back by the concerned office. The denial of the respondents is thus not tenable mere by denying that fact. *(Copy of joint appeal and report back by the concerned office are attached as R1 & R2).*

**GROUND:**

- A- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official and after September 2012 stoppage of monthly salaries of the appellant and not taking action on the departmental appeal of the appellant is against the law, rules, norms of justice and material on record. Therefore not tenable and liable to be set aside.
- B- Incorrect. While para B of the appeal is correct.
- C- Incorrect. The appellant was appointed as Pharmacy Technician (Dispenser) in BPS-9 vide order dated 31-12-011 on the proper recommendation of the Departmental selection Committee and he continuously performed his duty as a civil servant and has paid salary up to August 2012 by the concerned official. Therefore the appellant is entitled for salaries after September 2012 till date as the appellant is still in service and has not been terminated so for.
- D- Incorrect. While para D of the appeal is correct.
- E- Incorrect. While para E of the appeal is correct.
- F- Not replied according to para F of the appeal. Moreover para F of the appeal is correct.
- G- No comments.

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

*Zabellullah*  
APPELLANT

Through:

*Asif Yousafzai*  
( M. ASIF YOUSAFZAI )  
ADVOCATE, PESHAWAR.  
&

(TAIMUR ALI KHAN)  
ADVOCATE, PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

*Zabellullah*  
DEPONENT

R1 (4)

**OFFICE OF THE AGENCY SURGOEN NORTH WAZIRISTAN MIRANSHAH.**

PHONE & FAX; 0928-300788.

NO 2801 / DATED: MIRANSHAH THE 30/9 /2011.

To

The Director Health Services,  
FATA Warsak Road Peshawan.

SUBJECT: APPOINTMENT DURING THE LAST THREE(3) YEARS.

Memo:

Reference your Telephonic Message to day on 30-09-2011.

I have the honour to submit herewith the detail list of  
appointment during the last three years as follows.

S.NO	NAME	F:/NAME	Domicile	Designation	Date of Arrival
1	Mr. Khaista Rehman	Fateh Said	Bajaur	Medical Tech	3-11-2009
2	Mr. Shaheed Ullah Jan	Jan Behader	NWA	Medical Tech	03-11-2009
3	Mr. Zahid Iqbal	Banat Khan	NWA	Medical Tech	3-11-2009
4	Mr. Akhtar Ayub	Janabat Khan	NWA	Medical Tech	3-11-2009
5	Mr. Safder Elahi	Noor Elahi	NWA	Medical Tech	3-11-2009
6	Mr. Arifullah	Khushal Khan	NWA	Medical Tech	06-12-2009
7	Mr. Naveed Iqbal	Khan Behader	NWA	Medical Tech	12-11-2009
8	Mr. Wadood Ali Shah	Muhammad Nawaz Shah	Bannu	Medical Tech	10-01-2010
9	Mr. Farhad Ullah	Made Jan	NWA	Medical Tech	18-06-2010
10	Mr. Shahid ullah	Muhammad Nawaz	NWA	Dispenser	3-11-2009
11	Mr. Abdul Hanan	Gul Faraz Khan	Bajuar	Dispenser	
12	Mr. Zaheer ud Din	Noor Adil Shah	NWA	Diepsenser	3-11-2009
13	Mr. Inam Ullah	Shahadat Khan	NWA	Dispenser	22-11-2009
14	Namat Rasool	Azad Khan	NWA	Dispenser	25-03-2010
15	Mr. Nazeer Ahmad	Muhammad Younas	Bajaur	Dispenser	20-12-2009
16	Mr. Muhammad Qasim (ADP)	Muhammad Zuman	NWA	Dispenser	22-11-2009
17	Mr. Sayed Nawaz (ADP)	Sahed Nawaz	NWA	Dispenser	18-11-2009
18	Mr. Habib ullah (ADP)	Ber Mullah Khan	NWA	Dispenser	22-11-2009
19	Mr. Imran Ullah (ADP)	Muhammad Niaz	NWA	Diepenser	24-11-2009
20	Mr. Muhammad Zunir (ADP)	Noor Madat Khan	NWA	Dispenser	06-11-2009
21	Mr. Muhammad Akram (ADP)	Muhammad Saleem Shah	NWA	<del>Dispenser</del> Adjusted Against LHV in ADP	06-11-2009
22	Mr. Rafi Ullah (ADP)	Mir Sahab Khan	NWA	<del>Dispenser</del> Adjusted Against LHV in ADP	15-11-2009

3	Mustafa Khan (ADP)	Rashid Khan	NWA	Dispenser Adjusted Against LHV in ADP	25-12-20
24	Hafiz Noor (ADP)	Sayed Manoor	NWA	Dispenser Adjusted Against LHV in ADP	1-1-2010
25	Miss. Basnoor Bibi	Samin Ullah	Bnnu	LHV	12-11-20
26	Miss. Tabsuam	Gul Naib Khan	Bannu	LHV	15-11-20
27	Miss Husai	Adil Khan	NWA	LHV	15-11-20
28	Miss. Zubida Khanam	Kari mud Din	D.I. KHAN	LHV	19-12-20
29	Miss. Komal Saba	Palol Khan	NWA	LHV	23-12-20
30	Miss: Romana Akram	Muhammad Akram	D.I.Khan	LHV	23-12-20
31	Faiqa	Habib Ullah	Bannu	LHV	31-12-20
32	Zar Taj	Hukam Zada	Bannu	LHV	6-1-2010
33	Miss Permeen Gul	Gul Shah Zada	BANNU	LHV	30-1-20
34	Miss. Nasima Bibi	Noor Bad Shah	Bannu	LHV	20-02-20
35	Miss Zakishah	Din Bad Shah	NWA	LHV	18-06-20
36	Miss. Waheeda LHV	Aman ullah	NWA	LHV	2-6-2010
37	Mr. Attaur Rehman	Wali Muhammad	NWA	Assistant Superintendent Malaria	25-06-2010.
38	Mr. Sajid Khan	Murad Ali	NWA	Dental Tech	18-11-20
39	Mr. Feroz Shah	Hakim Shah	NWA	Lab Asstt Against Dispense	18-11-20
40	Sayel Khan	Zarbab Khan	NWA	EPI Tech Against LHV	12-11-20
41	Mr. Asif Mehmood	Taj Muhammad	NWA	X-Ray Against LHV	3-12-20
42	Mr. Sabghat ullah	Zaffar Ali	NWA	Lab Tech Against LHV	3-12-20
43	Sardar Ayub	Ayub Khan	NWA	EPI Tech Against LHV	6-12-20
44	Mr. Khatib Ullah	Saeed Khan	NWA	EPI Tech Against LSV	3-12-20
45	Mr. Gul Rehman	Inayat Khan	NWA	Dispenser Against LHV	10-12-20
46	Mr. Salim ullah	Hanif ullah	NWA	Lab Asstt Against ECG	17-12-20
47	Mr. Shahid Ullah	Muhammad Noor Gul	NWA	Lab Asstt Against LHV	25-12-20
48	Mr. Noor Hayat	Salim Muhammad	NWA	Dispenser Against LHV	15-01-20
49	Mr Ajab Noor	Shaniaraz	NWA	Lab Astt Against LHV	2-4-20
50	Mr. Niazam ud Din	Fazal Ghani	NWA	MT Against LHV	2-4-20
52	Sher Ali BAZ	Niaz Khan	NWA	BP TECH	8-4-20
53	Zia ullah	Abdul Hamid	NWA	Lab Asstt Against Physiotherapist	21-03-2010.
54	Asif	Yqoob	NWA	Lab Asstt Against	22-11-20

57	Safdar Ali	Dilawar Khan	NWA	Junior Clerk	06-0
58	Mansoor Ahmad	Qamar Ali	NWA	Junior Clerk	03-0
59	Jamil Ahmad	Nasib Akhtar	NWA	Junior Clerk	01-0
60	Muhammad Niaz	Nawshar Khan	NWA	Junior Clerk	03-0
61	Abdur Rehman	Zainullah	NWA	Malaria Inspector	23-0
62	Noor Ayub		NWA	EPI Tech	
63	Muhammad Tariq	Gul Zarooof	NWA	EPI Tech	
64	Zainullah	Madaraz	NWA	EPI Tech	29-0
65	Azmat ullah	Lair Jan	NWA	EPI Tech	
66	Abdullah	Aslam Khan	NWA	Sweeper	28-0
67	Nazullah Khan	Mather Khan	NWA	Behishty	10-0
68	Manoor Khan	Hajji Adil Mir	NWA	Sweeper	12-0
69	Asmad ud Din	Abdul Hakim	NWA	Mali	2-01
70	Din Faraz	Juma Gul	NWA	Cook	31-0

  
 AGENCY SURGEON  
 NORTH WAZIRISTAN MIRANSHA

OFFICE OF THE AGENCY SURGEON NORTH WAZIRISTAN MIRANSHAH.

Health : Hospitals And Services: 0731-G.H.S. :073101-G.H.S. Demand:No.111

AREAR BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE W.E.FROM 01/07/2013 TO 31/10/2014=16(MONTHS).

Dental Tech & Driver Working Against M/Tech:

and Lab: Tech:EPS-9 & EPS-4

MWGO31

R-2  
T-132  
9/12/2014

S. No	Name	CATA GARY	AO1151 Pay	1/7/2013 to 30/11/2013 5-Months= Due	Drawn	Diff:	Total	1/12/2013 to 31/10/2014 11-Months= Due	Drawn	Diff:	Total	Grand Total
✓ 1	Mirfan Ali Shah Dental Tech:THQ Mir Ali	A	17600	2533	1722	861x5=4305/-	4305/-	2640	1760	880x11=9680	9580/-	13985/- ✓
✓ 2	Sahib Noor Driver BPS-4	A	9570	1448	964	482x5=2410	2410/-	1431	987	494x11=5434	5434/-	7244/- ✓
✓ 3	Abdul Nasir Lab: Tech:	B	8850	1272	848	424x5=2120/-	2120/-	1329	866	443x11=4873	4873/-	6993/- ✓
✓ 4	Muhammad Zubair MT	A	8850	1272	848	424x5=2120/-	2120/-	1329	866	443x11=4873	4873/-	6993/- ✓
✓ 5	Kamal Hussain Agaist MT	B	8480	1215	810	405x5=2025/-	2025/-	1272	848	424x11=4664	4664/-	6689/- ✓
✓ 6	Madood Ali Shah MT	A	7340	1044	696	348x5=1740/-	1740/-	1101	734	367x11=4037	4037/-	5777/- ✓
✓ 7	<del>XXXXXXXXXXXX</del>	B	17380	2532	1688	844x5=4220/-	4220/-	2607	1738	869x11=9559	9559/-	13779/- ✓
Total			78390				13940/-				43120/-	62060/- ✓

CLASSIFICATION	Amount
AR-15%NEW	62060
(00000) G.Total	62060
Deduction:-	0
Net Total:-	62060

O.K. 29/12/2014

AGENCY SURGEON  
NORTH WAZIRISTAN MIRANSHAH

AGENCY SURGEON  
NORTH WAZIRISTAN MIRANSHAH



AREAR BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE W.E.FROM 01/07/2013 TO 31/10/2014=16-MONTHS).

TEMPERARY BILL  
MW0031

Name	CATA GARY	AO:15% Pay	1/7/2013 to 30/11/2013 5-Months= Due	Drawn	Diff:	Total	1/12/2013 to 31/10/2014 11-Months= Due	Drawn	Diff:	Total	Grand Total
Feroz Shah Lab Tech. Against D so RHC Spinwam	B	7720	110	734	367x5=1835/-	1835	1158	772	366x11=4248/-	4248	6083
Wahed Ullah Lab Technician Against LHV CH Boya	A	7720	110	734	367x5=1835/-	1835	1158	772	366x11=4248/-	4248	6083
Sabbat Ullah Lab Technician Against LHV CH Hassan Khel	A	7720	110	734	367x5=1835/-	1835	1158	772	366x11=4248/-	4248	6083
Sardar Aziz EPI Technician Against LHV	A	7720	110	734	367x5=1835/-	1835	1158	772	366x11=4248/-	4248	6083
Azad Noor Lab Technician Against LHV	A	7720	110	734	367x5=1835/-	1835	1158	772	366x11=4248/-	4248	6083
Nizamud Din MT Against LHV	A	7720	110	734	367x5=1835/-	1835	1158	772	366x11=4248/-	4248	6083
Shabbah Maria supervisor against LHV	B	7340	1044	699	348x5=1740/-	1740	1101	734	367x11=4037/-	4037	5777
Wahed Ullah Malaria Supervisor against LHV	B	7340	1044	699	348x5=1740/-	1740	1101	734	367x11=4037/-	4037	5777
Total		61000				14490				33550	48040

8136  
9/12/2014

CLASSIFICATION.	Amount.
AO-15% NEW	48040
(00000) G.Total	48040
Deduction:	0
Net Total:	48040

17  
17 E No: 227  
25/10/2014

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

AGENCY SURGEON,  
NORTH WAZIRISTAN MIRANSHAH

Acquisition cost for the month of August paid in Sept 12

Name	Net pay	
1- Ashraf Ali Khan	14171	
2- Lal Man Khan	14171	
3- Saeed Noor	14171	
4- Jamat Min	14171	
5- Shar Muhammad	14171	
6- Nazam Jan	14171	
7- Haji Akbar	14171	
8- Gul Rahman	14191	
9- Parvez Khan	13509	
10- Wahidullah	12926	
11- Miran Mir	13501	
12- Nam Shahary	15370	
13- Muhammad	15370	
14- Nazeerullah	14790	
15- Noor Ullah	16539	
16- Shaban Taj	14281	
17- Waleem Khan	14266	
18- Amir M. Khan	14286	
19- Rabi Khan	14286	
20- Sarwar	14266	
21- Farid Khan	14266	
22- Asghar	14266	
23- Mohd. Sadiq Khan	15780	
24- Muzafar Hussain	15280	
25- Badar Khan	13780	
26- Naim Ahmad	16009	
27- Shah Nadeem Khan	15250	
28- Khairuddin	15450	
29- Shaban Simb	17268	
30- Sarwar Khan	17268	
31- Parhad Khan	17268	
32- Asghar	17268	
33- Sameer	17268	

R-3 (3)

As our name is full for the month of August (10) Paid in septem

S No. Name. Net pay. Signature

35	patilla	14845	
36	Tokidulla	14845	
37	Muld. Astam.	16339	
38	injalurech.	10339	
39	Sajirucha.	16339	
40	Noor-ud-Istam.	15780	
41	Muld. Rahim.	16334	
42	Uzun Afzal.	15809	
43	Muld. Noor.	15980	
44	Pir Muld Jan.	15152	
45	Muld. Yousof.	15780	
46	Saleemulla.	15780	
47	Ashad Afzal.	15280	
48	Muzim Muld.	16339	
49	Taslim ulah.	14039	
50	Noor passam.	16339	
51	Aman yagzab.	16339	
52	Noor Hakim.	15780	
53	Abdul Haman.	14141	
54	Fazal madood.	15880	
55	Muzat Jahan.	15870	
56	Zaynuddin.	14750	
57	Bani dular.	14750	
58	Sham suvwarab.	15350	
59	Rah. Sham.	15450	
60	Toungam.	14750	
61	Muzim pany.	15750	
62	Muzim pany.	14250	
63	Muzim pany.	14236	
64	Muzim pany.	14236	
65	Muzim pany.	14236	
66	Muzim pany.	14236	

Net pay. Signature

47759



R-5 (12)

Mar. 18 2014 01:49PM P1

AGENCY SURGEON-NWA MOHMAND

FAX NO. : 0928-300788

**OFFICE OF THE AGENCY SURGOEN  
NORTH WAZIRISTAN AGENCY MIRANSHAH.  
PHONE & FAX: 0928-300788.**

NO

574

D-4

Date:

Miranshah

18

03 2014

To

The Director Health Services,  
FATA Warsak Road Peshawar

10-2588  
19-03-2014

Subject:  
Memo


**COMPLAINT.**

Reference your official letter bearing endst. No.4213/DHS/FATA dated 12/03/2014 on the subject noted above. I have the honour to state that as per checking the record of this office there is no such record available of the officials individual concerned like their appointment orders, service books, health & age, even the dispatch register of that time.

However photo copies of their service books along with service appeals lodged them in Khyber Pakhtunkhwa Service Tribunal Peshawar against your good office as well as the order of the undersigned, received through Mr. Akhtar Nawaz elder brother of Dr. Rahim Nawaz the then Agency Surgeon. This office has checked all the service books with the pay bills for the month of May 2012. It has pointed out that there is a huge different between the pay fixed in their service books and pay / allowances drawn in the pay bills.

Keeping in view of the above it has also pointed out that their appointment orders were issued as a Malana Supervisor BPS-09 against the vacant post of LHVs and Dispensers during ban period with out advertisement / conducting of proper interview. It is a main cause for withdrawal of their names from monthly pay bills by Dr. Azam Wazir, Ex-Agency Surgeon w.e.f. from 01/09/2012.

Report is submitted for further necessary action as desired please.

  
Agency Surgeon  
North Waziristan Miranshah.

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

Appeal No. 703/2013

Mr. Zabih Ullah Malaria Supervisor

..... Appellant

**Versus**Director Health (FATA) & Anothers..... **Respondents****Para wise joints comments on behalf of respondent No. 1.****Preliminary objections**

1. That the appellant has no cause of action/locus standi to file the present appeal.
2. That the appellant is estopped by his own conduct to file the instant appeal.
3. That this Honorable Service Tribunal has got no jurisdiction to entertain the instant appeal.
4. That the instant appeal is bad for mis joinder & non-joinder of necessary parties.
5. That the present appeal is barred by law.
6. That the appeal is not maintainable in its present form.
7. That the present appeal is bad in its present form, hence not maintainable and liable to be dismissed

**Respectfully Sheweth;****ON FACTS**

1. Incorrect, neither any posts were advertised nor the appellant was selected by the Departmental Selection Committee. Moreover, the appellant have not attached appointment order or NIC with the appeal. Furthermore appointment of para-medics against other post is not admissible under the rules. Further the appellant claims to be appointed as Malaria Supervisor (BPS-9). However, the so called forged documents annexed by the appellant shows him to be posted as against the vacant post of Lady Health Visitor on contract basis.

0-12  
 16-10/15

(2)

2. Incorrect, the appellant has not been appointed nor did he perform any duty.
3. Incorrect, the official concerned has never been paid any salary as he has not been appointed.
4. Incorrect, no Departmental Appeal has been made.

**ON GROUNDS**

- A. Incorrect, the appellant has not been appointed so he is not entitled for salary.
- B. Incorrect, as per Paras mentioned in the facts of the reply.
- C. Incorrect, the appellant has not been appointed nor did perform any duty therefore, not entitle for salary.
- D. Incorrect, as per paras mentioned above.
- E. Incorrect, as per paras mentioned above.
- F. Incorrect.
- G. No comments.

It is therefore most humbly prayed that the appeal of the appellant may kindly be dismissed with cost.

Respondent No. 01

  
Director Health Services (FATA)  
FATA Secretariat, Peshawar





خدمت صباں ایسی ہیں صلابت ہیں صبا

⑤ صبا عالی

گنوارشن کی جاتی ہے کہ فردی کے بحوالہ فرم 85-3482  
بحوالہ فرم 31<sup>12</sup>/<sub>2011</sub> حج کا وقت حاضر ہوا۔ لہذا اطلاع  
رہو کہ عرض کی جاتی ہے کہ میرا درخواست قبیل فرم کی

الارض

مردم: 01  
2012

ایکایا لیدار ضیغ اللہ علیہ السلام

HIC  
Keep on record

Almid  
A

2012-1-1

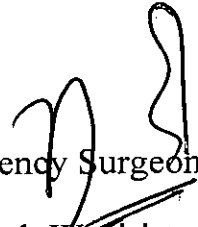
PERFORMANCE CERTIFICATE

6

Certified that Mr. Mst Zabihullah S/O D/O Muhammad Rauf

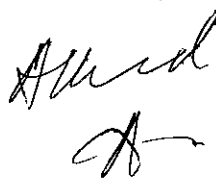
is performing his/her/ Govt duty regularly from the date of appointment till date.

There is no Complaint ag~~ain~~st him/her. He/she has a good moral character.

  
Agency Surgeon

North Waziristan Agency

Miranshah

  
A



# VAKALAT NAMA

NO. \_\_\_\_\_ /2013

IN THE COURT OF S-T. 12/12

Zabihullah

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Agmy Buzgior cd other

(Respondent)  
(Defendant)

I/We Zabihullah

Do hereby appoint and constitute **M.Asif Yousafzai, Advocate, Peshawar,** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_ /2013

Zabihullah

( CLIENT )

ACCEPTED

M. Asif Yousafzai

**M. ASIF YOUSAFZAI**  
Advocate

**M. ASIF YOUSAFZAI**  
Advocate High Court,  
Peshawar.

**OFFICE:**

Room No.1, Upper Floor,  
Islamia Club Building,  
Khyber Bazar Peshawar.  
Ph.091-2211391-  
0333-9103240

OFFICE OF THE AGENCY SURGEON NORTH WAZIRISTAN MIRANSHAH.

907-Health : Hospitals And Services: 0731-G.H.S. :073101-G.H.S. Demand:No.111

AREAR BILL FOR LESS DRAWAL OF AD-HOC RELIEF ALLOWANCE W.E.FROM 01/07/2013 TO 31/10/2014=16-MONTHS).

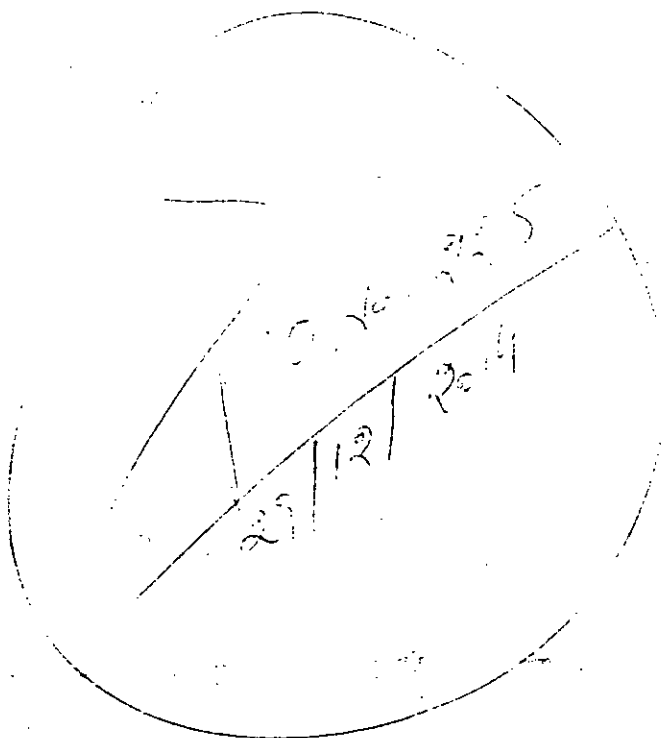
R-2  
T-132  
9/12/2014

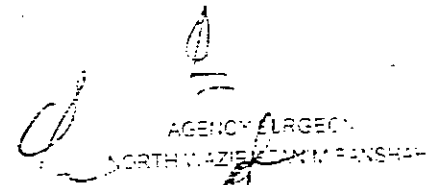
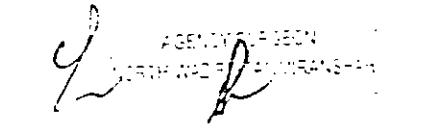
Dental Tech & Driver Working Against MTech:

MW0031

S. No	Name	CATA GARY	AQ1151 Pay	1/7/2013 to 30/11/2013 5-Months= Due	Drawn	Diff:	Total	11/02/2013 to 31/10/2014 11-Months= Due	Drawn	Diff:	Total Grand Total	
1	Mir Ali Shah Dental Tech:THO Mir Ali	A	17500	2533	1722	851x5=4305/-	4305/-	2340	1760	680x11=6800	9890/-	13995/- ✓
2	Sahib Noor Driver BPS-4	A	9570	1445	964	482x5=2410	2410/-	1431	997	494x11=5434	5434/-	7844/- ✓
3	Abdul Nasir Lab: Tech:	B	8850	1272	848	424x5=2120/-	2120/-	1329	888	443x11=4873	4873/-	6993/- ✓
4	Muhammed Zubair MT	A	8850	1272	848	424x5=2120/-	2120/-	1329	888	443x11=4873	4873/-	6993/- ✓
5	Kamal Hussain Against MT	B	8481	1215	810	405x5=2025/-	2025/-	1272	848	424x11=4664	4664/-	6889/- ✓
6	Wadood Ali Shah MT	A	7340	1044	696	348x5=1740/-	1740/-	1131	734	367x11=4037	4037/-	5777/- ✓
	<del>12</del>	B	17381	2532	1688	344x5=1720/-	1720/-	2307	1738	869x11=9559	9559/-	13775/- ✓
Total			78390				13940/-				43120/-	62060/- ✓

CLASSIFICATION	Amount
AR-15%NEW	62060
(02000) G.Total	62060
Deduction:-	
Net Total:-	62060 ✓


  
 10,16,2015  
 29/12/2014

  
 AGENCY SURGEON  
 NORTH WAZIRISTAN MIRANSHAH  
  
  
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