

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
AT CAMP COURT SWAT.

Service Appeal No. 172/2022

Date of institution ..... 04.02.2022

Ghazala Lady Health Visitor Basic Health Unit Gulibagah Swat.

VERSUS

Secretary Health Services Government Khyber Pakhtunkhwa  
Peshawar and five others.


O R D E R  
12.05.2022

Learned counsel for the appellant namely Umer Khitab,  
Advocate present.

Learned counsel for the appellant stated at the bar that the  
appellant is not a civil servant and this Tribunal has got no  
jurisdiction to entertain the instant appeal, therefore, requested for  
withdrawal of the instant appeal for invoking jurisdiction of proper  
forum. In this respect, learned counsel for the appellant also  
submitted an application, which is placed on file.

In view of the above, the appeal in hand stands dismissed as  
withdrawn. The appellant would be at liberty to approach the proper  
forum, if so advised. Parties are left to bear their own costs. File be  
consigned to the record room.

ANNOUNCED  
12.05.2022

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT SWAT

Before The Service Tribunal N. P. Peshawar.  
Appeal No. 134/22

Ghazala LHV BHB Guli Bafak Swat --- Appellant  
Versus.

1) DHO Swat and others - - - - Respondents.

Application with drawal of mentioned appeal with  
The permission of This Hon: Tribunal to re-invoke  
Jurisdiction of proper forum.

Respectfully Sheweth.

- 1) That The above appeal pending in This  
Hon: Tribunal which is fixed today.
- 2) That inadvertently appeal was filed before  
This Hon: Tribunal and <sup>came</sup> to knowledge  
of the appellant that she is not civil servant  
hence This Hon: Tribunal was got no  
Jurisdiction to entertain the instant appeal
- 3) That the appellant wants withdraw the instant  
appeal and invoke the proper forum for  
remedy.

It is therefore requested that the  
instant appeal may kindly be withdrawn  
to appellant for invoking Jurisdiction for  
proper forum.

Ghazala  Appellant  
Through

Umar Khilab Advocate

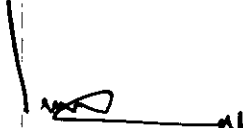
12/05/2022

Form- A

FORM OF ORDER SHEET

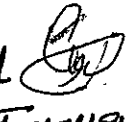
Court of \_\_\_\_\_


Case No.- \_\_\_\_\_ 172/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/02/2022	<p>The appeal of Ghazala presented today by Mr. Umar Khitab Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put there on <u>12-5-2022</u></p> <p style="text-align: right;">CHAIRMAN</p>

## CHECK LIST

CASE TITLE.	Ghazla V/S Secretary Health services Khyber Pukhoonkhw Peshawar.		
2	Case is duly signed	Yes	
3	The law under which the case is preferred has been mentioned.	Yes	
4	Approved file cover is used.	Yes	
5	Affidavit is duly attested and appended.	Yes	
6	Case and Annexure are properly paged and numbered accordance.	Yes	
7	Copies of Annexure are legible and attested. If not the better copies duly attested have been filed.	Yes	
8	Certified copies of all the requisite documents have been filed.	Yes.	
9	Certificate specifying that no case on similar grounds was earlier submitted this court.	Yes	
10	Case with the in time.	Yes	
11	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.		No
12	Court fee in shape of stamp paper form.		No
13	Power of attorney is in proper form	Yes	
14	Memo of addresses filed.	Yes	
15	List books mentioned in the petition		No
16	The requisite number of spare copies attached write petition.3 No,s of civil appeal (SD-DB)	Yes	
17	Case revision /appeal/petition etc is filed on the prescribed form.	Yes	

Appellant   
Through

  
UMAR KHITAB  
Advocate.  
High Court.

cell # { 0345 9524854  
0343 9377656

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHOON KHW PESHAWAR.

APPEAL No. 172 / 2022

Ghazla L.H.V. Basis Health Unit Guli Bagah SWAT.....Appellant.

VERSUES.

1. Secretary Health Services Khyber Pukhoon Khw Peshawar and others.....Respondents.

INDEX.

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 Ghazla.....Appellant. ✓

Through

Umar Khitab Advocate High Court District Courts  
Gulkada Saidu Sharif Swat.

Cell No. 0345-9524854. 03435-9377656

BEFORE THE SERVICE TRIBUNAL KHYBER

PUKHTOONKHW PESHAWAR.

Appeal No: 172/2022  
Ghazala Lady Health/Visitor Basic Health Unit Gulibagh  
Swat.....Apellant.

(U)

Versus.

Pukhtoonkhwa  
Service Tribunal

Diary No. 155

Dated 04-02-2022

1. Secretary Health Services Government Khyber Pukhtoonkhw Peshawar.
2. Director General Health Services Khyber Pukhtoon khw Peshawar.
3. Project Director PMU,s Primary Care Project 24/7 R.H.C,S B.H.U,s DGHS K.P Peshawar.
4. District Heath Officer Gulkada Saidu Sharif Swat.
5. District Health Officer Lower Dir.
6. Mst: Nighat L.H.V. B.H.U. Gulibagh Swat...Respondents.

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER NO,1384-89/PMU/DGHS DATED 09/09/2021 OF RESPONDENT NO 3 WHICH IS ILLEGALY WITH OUT SERVICE RULES AND LAWS OF LAND AND AGAINST THE WEDLOCK POLICY ISSUE THE TRANSFER ORDER OF THE APPELLANT.

PRAAYER IN APPEAL.

On the acceptance of instant appeal the impugned order No.1384-89 dated 09/09/2021 may kindly be declared null and void i,e the transfer order of the appellant may kindly be cancelled.

Respectfully Shewth.

1. That the appellant was appointed as L.H.V. through the Departmental selection Committee on merit basis vide order No.1372-76/PMU/DGHS Dated 07/09/2021 in B.H.U. Gulibagh Swat.( Appointment order as Annex;A )

Filed to-day

Registrar

412/2022

2. That the Husband of the appellant is Government servant and performing his duty as Customer support Representative in Pakistan Telecommunication Swat.(P.T.C.L)( Appointment order of appellant Husband as Annex B)

3. That the appellant took over charge in B.H.U Gulibagah on 08/09/2021.( arrival Report as Annex: C)

4. That the Respondent No.3 after 2 days i.e. 09/09/2021 transferred the appellant on the political basis to B.H.U. Pangal Lower Dir.( Transfer order of appellant as Annex: D )

5. That the appellant submitted arrival report in the Ist weak of October 2021 B.H.U. Pingal Lower Dir, but the Medical Officer of the B.H.U. Pangal Low Dir not accept the arrival report of the appellant.

6. That the appellant submitted a application to Respondent No.2 for further guidance and mention about the arrival report in B.H.U. Pangal Lower Dir.(Application for Guidance as Annex:E)

7. That in the appointment orderNo.1372-67 dated 07/09/2021 it is clearly mention that the appointee is not transferable.

8. The Respondent No. 3 violated the condition mention in the appointment order.

9. That the appellant being aggrieved from the illegal transfer order of Respondent No.3. the appellant preferred Departmental appeal to Respondent No.1 on 05/11/2021, which is not yet been decided hence this appeal lie.

(Departmental appeal as Annex:F)

GROUND OF APPEAL.

1. That the appellant Departmental appeal have already submitted to Respondent No.1 on 05/11/2021.

2. That Respondent No.2 not issuing the cancellation transfer order of the , which against the law and violation of fundamental law of land.

3. That the appellant has been a raw deal and has been deprived illegally transfer order of the appellant.

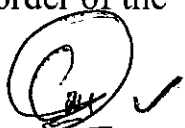
4. That the appellant has not been treated according to law and rules and has been illegally deprived from her legal right.

5. That the impugned order No,1384-89 dated 9/9/2021 of Respondent No. 3 is against the law and facts hence to liable to be set s side because it is against the law norms of service laws and rules.

6. That the some other grounds may be argued at the time of arguments of instant appeal with the prior permission of this Honorable Tribunal.

7. Any other remedy which is just and appropriate may also be awarded though, not specially prayed for.

On the acceptance of instant appeal the impugned order No.1384-89 dated 09/09/2021 may kindly be declared null and void i,e the transfer order of the appellant may kindly be cancelled.

  
Ghazla.....Appellant.

Through

Umar Khitab /Advocat High Court.

Cell No. 0345-9524854. 0345-9377656



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BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHW  
PESHAWAR.


Ghazala Lady Health Vaster Basic Health Unit Gulibagah Swat.....Apellant.

Vesues.

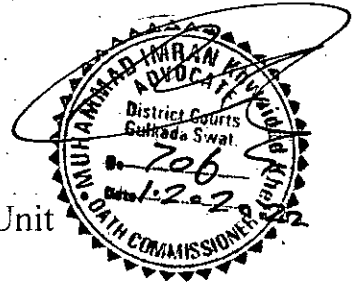
1. Secretary Health Services Government Khyber Pukhtoon khw Peshawar.
2. Director General Health Service Khyber Pukhtoon khw Peshawar.
3. Project Director PMU,s Primary Care Project 24/7 R.H.C,S  
B.H.U,s DGHS KP Peshawar.
4. District Heath Officer Gulkada Saidu Sharif Swat.
5. District Health Officer Lower Dir.
6. Mst: Nighat L.H.V. B.H.U. Gulibagah Swat.....Respondents.

AFFADIVIT.

It is stated on oath that all the contents of this appeal are true and correct to the best knowledge and belief. More over no such like appeal is pending before this Honorable Tribunal.

Deponent  .....

Ghazla Lady Health visitor Basis Health Unit  
Guli Bagah Swat.



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BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHW  
PESHAWAR.

Ghazala Lady Health Vaster Basic Health Unit Gulibagah Swat.....Apellant.

Versus.

1.Secretary Health Services Khyber Pukhoonkhw Peshawar and  
others.....Appellants.

MEMO OF ADRESSES.

Address of appellant.

1. Ghazla Lady Health visitor Basic Health Unit Guli Bagah Swat.  
Cell No. 0344- 9611540.

Address of Respondents.

2. Secretary Health Services Government Khyber Pukhtoon khw Peshawar.
3. Director General Health Service Khyber Pukhtoon khw Peshawar.
4. Project Director PMU,s Primary Care Project 24/7 R.H.C,S  
B.H.U,s DGHS KP Peshawar.
4. District Heath Officer Gulkada Saidu Sharif Swat.
5. District Health Officer Lower Dir.
6. Mst: Nighat L.H.V. B.H.U. Gulibagah Swat.....Respondents.

Apellant



Through



Umar Khitab Advocate High Court.

Cell No. 0345-9524854. 0345-9377656

6

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHW  
PESHAWAR.

Ghazala Lady Health Visitor Basic Health Unit Gulibagah  
Swat.....Apellant.

Versus.

1. Secretary Health Services Government Khyber Pukhtoonkhw Peshawar and others.....Respondents.

APPLICATION FOR SUSPENSION OF IMPUGNED ORDR NO.1384-89/PMU/DGHS/ DATED 9/9/2021 OF RESPONDENT NO.3 TILL THE DISPOSAL OF INSTANT APPEAL.

Respectfully shewth.

- 1 That the above mentioned appeal pending before this Honorable Tribunal which has not yet been fixed.
2. That the appellatant has prima facie case, under wedlock policy and impugned order has been done due to political pressure.
3. That the Balance of inconvenience is also in favour of appellatant.
4. That if the impugned order is not suspended till the disposal of appeal, the appellatant will bear irreparable lose.

On the acceptance of instant application the impugned order may kindly be suspended till the disposal of instant appeal.

Ghazila.....Appellant. ✓

Affidavit.

Certified that the contents of this application are true in my best knowledge, and no other application pending in the this Honourable Tribunal.

Ghazla.....Appellant. ✓

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BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHW PESHAWAR.

Ghazla L.H.V. B.H.U. Guli Bagh.....Appellant

Versues.

1. Secretary Health services Khyber Pukhoonkhw Peshawar & others ..... Respondents.

SERVICE APPEAL.

Subject:- APPLICATION FOR TRANSFER OF THE ABOVE MENTIONED APPEAL FROM SERVICE TRIBUNAL PESHAWAR TO THE SERVICE TRIBUNAL CAMP COURT SWAT FOR PRELIMINARY HEARING.

Respectfully shewth;

1. That the above mention appeal is pending before Honourable Tribunal Peshawar for Preliminary Hearing.
2. That the above mention appeal the appellant belong to District Swat.
3. That for the convenience of parties and due to weak financial position of the appellant, the above appeal may kindly be transfer to service Tribunal camp court Swat for preliminary Hearing.

On the acceptance of the instant application the above appeal may kindly be transfer to service Tribunal camp court Swat.

Ghazla  Appellant. ✓



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

(PMU) Project Management Unit for  
"Strengthening of all BHU's across KP and conversion of 200 BHU's into 24/7"  
& "Rehabilitation of all RHC's and Conversion of 50 RHC's into 24/7"  
Phone No. 091-9212099

*Amr A*

*8*

**OFFICE ORDER:**

Consequent upon the recommendations of Departmental Selection Committee (DSC) and after joining the service, the following Lady Health Visitors (LHVs) are hereby Posted under ADP Scheme "Strengthening of all BHU's across Khyber Pakhtunkhwa and conversion of 200 BHU's into 24/7" and "Rehabilitation of All RHC's and Conversion of 50 RHC's into 24/7 facilities" PMU, DGHS Khyber Pakhtunkhwa **only for Evening and Night shift non-transferable** as per following places of posting according to merit list and availability of positions. }

S.No	Name	Father's/Husband Name	District of Posting	Place of Posting
1	Nodia	Habib Ur Rehman	Malakand	BHU Haryan Kot
2	Safeena	Allau Ud Din	D.I Khan	BHU Zafarabad
3	Roshi	Ali Akbar Khan	Swabi	BHU Jalbhai
4	Asma	Khaista Muhammad	Malakand	RHC Sakhakot
5	Rakhshanda Alam	Khalil Khan	D.I Khan	BHU Shor kot
6	Uzma Bibi	(W/O) Zawar Hussain	Malakand	BHU Haryan Kot
7	Rukhsana Bibi	Muhammad Yaqoob Khan	Shangla	BHU Shoghla
8	Saima Khalil	Ibrahim Shah	Swat	BHU Charbagh
9	Seema Syed	Syed Nabi	Peshawar	RHC Regi
10	Fozia Naz	Hazrat Iqbal	Swabi	BHU Ismailia
11	Hajra Bibi	Umar Zada	Swat	BHU Charbagh
12	Nabia Asif	Asif Rehman	Peshawar	RHC Putwar Bala
13	Nayab Bibi	Sarbali Khan	Shangla	BHU Shoghla
14	Sitara Jabeen	Khursheed Anwar	D.I Khan	BHU Shor Kot
15	Shandana	Muhammad Jan	Charsadda	BHU Akhundheri
16	Bas Nazira	Muhammad Subhan	Bannu	BHU Kotaky Muhammad Khan
17	Anila Begum	Nek Muhammad	Malakand	BHU Shingari
18	Zeenat	Azizul Haq	Shangla	BHU Shoghla
19	Sumaira Khurshid Burki	Khurshid Alam	Tank	RHC Gul e Imam
20	Lubna	Hafeez Ur Rehman	Peshawar	BHU Jagrha
21	Nadia Kanwal	Maqbool Hussain Khan	D.I Khan	RHC Kot Jai
22	Nida Gul	Ishtiaq Gul	Peshawar	BHU Terai Payan
23	Rizwana	Nizam Ud Din	Lakki Marwat	RHC Gambila
24	Hina Karim	(W/O) Muhammad Islam	Mardan	RHC Mangah
25	Saira Taj	Taj Muhammad Khan	Malakand	BHU Shingari
26	Asma Noreen	Saqib Rashid	Kohat	RHC Gumbat
27	Naheed Qamar	(W/O) Sami Ulfah	Swat	RHC Darmai
28	Bibi Shahana	Sher Alam Khan	Lakki Marwat	RHC Gambila
29	Somia Zain	Zainullah	Peshawar	BHU Jagrha

*attached*

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30	Zeba Bibi	Malang Jan	Peshawar	BHU Jagrha
31	Nazima Akhtar	Muhammad Haroon	Buner	BHU Bagh
32	Naheed Akhtar	Akhtar Ali Shah	Peshawar	BHU Gulbela
33	Bushra Ihsan	Ihsan Ullah	Peshawar	RHC Tukhtabad
34	Naila Naz	Said Rehman	Kohat	RHC Gumbat
35	Shameem Ara	Muhammad Ali	Shangla	RHC Karora
36	Kanwal	Muhammad Saleem	Peshawar	BHU Saucedabad
37	Javeria Masnoud	Masnoud Khan	Swabi	BHU Jalbhai
38	Sadia Begum	Asaf Mir	Kohat	RHC Usterzai
39	Sumbal	Mesbah Ullah	Lakki Marwat	BHU Ghazni Khel
40	Yasmeen Hayat	Hayat Ullah	Lakki Marwat	RHC Titter Khel
41	Nusrat Ara	Wazir Shah	Dir Upper	BHU Akkhagram
42	Nadia Karim	Karim Dad	Mardan	RHC Shergarh
43	Shakeela	Muhammad Zahir shah	Swat	BHU Charbagh
44	Kiran Rafiq	Rafiq Ahmad	Swat	BHU Gullibagh
45	Romana Iram	Abdul Latif	Peshawar	BHU Terai Payan
46	Asma Bibi	Abdul Hafiz	Swabi	BHU Khalabut
47	Lubna Ihsan	Ihsan Ullah	Malakand	RHC Sakhakot
48	Shanza Maqbool	Maqbool Ur Rehman	Mansehra	RHC Shinkari
49	Akhtar Nisa	Nazar Jan	Lakki Marwat	BHU Shabazkhel
50	Gulshan Najeeb	Najeeb Ullah	D.I Khan	RHC Karri Shamoza
51	Rifat Razaq	Abdul Razaq	D.I Khan	RHC Karri Shamoza
52	Safia Naz	Abdul Kalam Jan	Kohat	RHC Usterzai
53	Shabnam	Muhammad Hadees	Swat	BHU Gullibagh
54	Kainat Rahman	Zameer Rahman	Buner	BHU Bagh
55	Maryam Bibi	Habib Ur Rehman	Mardan	RHC Sherharh
56	Ambreen	Khursheed Ali	Swat	RHC Darmai
57	Shahana	Muhammad Ayaz	Swat	RHC Darmai
58	Atiq Begum	Sherin Khan	Malakand	BHU Shingari
59	Musarat Bibi	Muhib Gul	Malakand	RHC Sakhakot
60	Saba	Ghulam Sarwar	Swabi	RHC Tordher
61	Irum Nawaz	Amir Nawaz Khan	Lakki Marwat	BHU Ghazni Khel
62	Sania Saeed	Muhammad Saeed	Mansehra	RHC Shinkari
63	Kausar Jabeen	Abdul Ghafar khan	Lakki Marwat	BHU Ghazni Khel
64	Uzma Irfan	Irfan Ullah	Shangla	RHC Karora
65	Fouzia Anjum	Aqal Din	Dir Lower	BHU Pingal
66	Naveela Bibi	Bakht Afsar Khan	Shangla	RHC Karora
67	Fazila Naz	Aman Ur Rashid	Kohat	RHC Usterzai
68	Bibi Maryam	Bil Qasim	Charsadda	BHU Akhundheri
69	Ishrat	Jehanzaib	Mansehra	RHC Shinkari
70	Farzana Sana	Sana Ullah	D.I Khan	RHC Karri Shamoza
71	Salma Bibi	Shahid Ur Rehman	Abbotabad	BHU Kotyala
72	Shaista Jabin	Inayat Ullah	D.I Khan	BHU Zafarabad
73	Samina Akhtar	Gull Bahadar	Bannu	BHU Kotakay Muhammad Khan

74	Afshan Bibi	Abdul Quddus	Peshawar	RHC Regi
75	Nayab Hamayun	Muhammad Hamayun	Charsadda	BHU Akhundheri
76	Noora Ayub	Ayub Jan	Swabi	RHC Sheikh Jana
77	Muniba Gul	Char Gul	Lakki Marwat	RHC Titter Khel
78	Hasrat Bibi	Sakhi Matjan	Tank	RHC Gul e Imam
79	Roema Khan	Imran Gul	Swabi	RHC Tordher
80	Fauzia Gul	Suleman Shah	Peshawar	RHC Tukhtabad
81	Kiran Firdous	Sher Baz Khan	Bannu	BHU Kotakay Muhammad Khan
82	Haya Bibi	Mir Sahib Khan	Peshawar	BHU Gulbela
83	Mahnoor	Shah Jehan	Mardan	BHU Jamra
84	Bushra Inam	Inam Ullah	Peshawar	BHU Saeedabad
85	Khadija Begum	Nawab Khan	Bannu	BHU Lalozai
86	Sahiba Bibi	Amanullah Khan	Lakki Marwat	RHC Gambila
87	Sabeha Akhtar	Khan Gul	Dir Lower	BHU Pingal
88	Azra Naz	Abdul Qayyum	D.I.Khan	RHC Kot Jai
89	Nadia Bibi	Muhammad Arif	D.I Khan	RHC Kot Jai
90	Azra Fazal	Fazal Hakeem	Charsadda	BHU Hissara Faqirgul
91	Anila Gul	Zahid Ullah	Lakki Marwat	RHC Titter Khel
92	Iqra Saqib	Hamid Zaman	Swabi	BHU Jalbhai
93	Sarwat	Aman Ullah	Mardan	BHU Jamra
94	Irsa Bibi	Farman Bibi	Abbottabad	BHU Kotyala
95	Urossa Khurshid	Muhammad Khurshid	Mansehra	RHC Lissan Nawab
96	Mahnoor Ejaz	Ejaz Muhammad	Swabi	RHC Tordher
97	Saman	Zamin Ullah	Charsadda	BHU Hissara Faqirgul
98	Somaya Bibi	Saif Ul Islam	Battagram	RHC Thakot
99	Kalsoom Anjum	Yousaf Khan	Malakand	BHU Haryan Kot
100	Shazia Akbar	Sher Akbar	D.I Khan	BHU Shor Kot
101	Roqia Gul	Zamir Gul	Hangu	RHC Naryab
102	Rukhsana Faiz	Faiz Muhammad	D.I Khan	BUH Daraban Khurd
103	Kawsar Bibi	Amir Quriash	Battagram	RHC Thakot
104	Uroosa	Hamdul Ghfoor	Mardan	BHU Jamra
105	Sauda	Abdul Wahid	Battagram	BHU Paemal Sharif
106	Huma Zahoor	Zahoor Ud Din	Lakki Marwat	BHU Shabazkhel
107	Asma Tahseen	Abdur Raziq	Hangu	RHC Naryab
108	Nilam Noor	Noor Muhammad	Tank	RHC Gul e Imam
109	Hafsa Habib	Habibullah	Peshawar	RHC Tukhtabad
110	Farhad Bibi	Ashtar Khan	Buner	BHU Bagh
111	Ghazala	Mir Zaman Khan	Swat	BHU Gullibagh
112	Amina Waheed	Waheed Ullah jan	Swabi	RHC Sheikh Jana
113	Nageena Rehman	Muhammad Rehman	Mansehra	RHC Lissan Nawab
114	Sabeela Bibi	Muhammad Farooq	Mansehra	BHU Sandesar
115	Noureen	Allah Nawaz	D.I Khan	BHU Zafarabad

*[Handwritten signature]*

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11

116	Sadia Kiran	Fazal Ur Rehman	D.I Khan	BHU Daraban Khurd
117	Sabreena	Rahamat Ullah	Swabi	BHU Ismailia
118	Tahira Naz	Rokhan Zeb	Swabi	BHU Ismailia
119	Shamsa Asghar	Ali Asghar	Abbottabad	BHU Nawasher
120	Sumaiya	Abdul Khaliq	Battagram	RHC Kuzabanda
121	Rabia Sanam	Rustam Khan	D.I Khan	BHU Daraban Khurd
122	Asma Bibi	Fazal Manan	Battagram	RHC Thakot
123	Nighat	Fandoon	Dir Lower	BHU Pingal
124	Leona Akhtar	Rapid Ahmad	Swabi	BHU Khalabut
125	Faihat Zaman	Muhammad Zaman	Bannu	BHU Laloza
126	Mehwish	Muhammad Ilyas	Kohat	BHU Dhoada
127	Sadal	Fazal Ahmad	Peshawar	BHU Saeedabad
128	Isma	Humayoon Khan	Swabi	BHU Khalabut
129	Tahira Naz	Habib Ur Rehman	Kohat	BHU Dhoada
130	Shabina Gul	Muhammad Rafique Abbasi	Mansehra	BHU Sandesar
131	Sana Orusa	Omer Khan	Kohat	BHU Togh Bala
132	Sohni	Ubaid Alam	Dir Upper	BHU Akkhagram
133	Rabia Bibi	Adnan	Haripur	RHC Kot Najibullah
134	Nadia Kalsoom Khan	Haji Ahmed Hussain	Bannu	BHU Laloza
135	Iram	Khan Toti	Dir Lower	BHU Osakai
136	Sidra Bibi	Muhammad Ajmir Shah	Peshawar	RHC Putwar Bala
137	Nargis Hayat	Umar Hayat	Kohat	BHU Dhoada
138	Sidra Rahim	Fazle Rahim	Dir Lower	BHU Osakai
139	Hafsa	Afzal Khan	Mardan	RHC Mangah
140	Aimen	Muhammad Riaz	Peshawar	BHU Terai Payan
141	Ruqiya Aziz	Aziz Khan	Mardan	RHC Mangah
142	Nosheen	Manzoor Ahmad	Peshawar	RHC Putwar Bala
143	Amna Nasir	Nasir Khan	Peshawar	RHC Regi
144	Salima Bibi	Meherban Khan	Abbottabad	BHU Nawasher
145	Kainat Hussain	Muhammad Hussain	Dir Lower	BHU Osakai
146	Fatima Arooj	Feroz Ali Khan	Bannu	BHU Bada Mera Baz
147	Saima Farooq	Muhammad Farooq	Mardan	BHU Garhi Ismailzai
148	Sabeeha Altaf	Muhammad Altaf	Buner	BHU Gokand
149	Hajira Hayat	Muhammad Hayat	Peshawar	BHU Gulbela
150	Mehvish	Pahlawan	Abbottabad	BHU Kotyala
151	Sara	Nisar Muhammad	Abbottabad	BHU Nimble
152	Faiza	Shafi Muhammad	Abbottabad	BHU Nimble
153	Mukhtar Bibi	Hassan Noor	Mansehra	BHU Sandesar
154	Alia	Rahim Jan	Mansehra	BHU Bherkund
155	Farjam Nasreen	Rashid Islam	Hangu	RHC Naryab
156	Hafiza Zakia	Jehanzeb Khan	Mardan	RHC Shergarh
157	Sadia Khan	Aam Khan	Lakki Marwat	BHU Shabazkhel
158	Saima Bibi	Gul Perviz Khan	Mansehra	BHU Bherkund




159	Sumbal Sikandar	Sikandar Khan	Abbottabad	BHU Nimble
160	Syed Samreen Khan	Ghous Muhammad	Swabi	RHC Sheikh Jana
161	Saima Naz	Abdul Rauf	Mardan	BHU Garhi Ismailzai
162	Saidun Nisa	Hasan Khan	Abbottabad	BHU Nawasher
163	Shazia Manzoor	Manzoor Shah	Abbottabad	RHC Kalapani
164	Ulfat	Bakht Mohammad	Haripur	BHU Bagra
165	Nausheen	Hidayat Ullah	Mansehra	RHC Lassan Nawab
166	Haleema Bibi	Umar Zada	Buner	BHU Gokand
167	Sabahat Rafi	Rafi Ullah	Haripur	RHC Kot Najibullah
168	Ghazala	Abdul Maboob	Charsadda	BHU Hissara Faqirgul
169	Noor Shad Begum	Fazal Muhammad	Hangu	BHU Tough Sarai
170	Arrosa Bibi	Khurshid Ahmad	Haripur	RHC Kot Najibullah
171	Sadia Naz	Shaist Khan	Hangu	BHU Tough Sarai
172	Sidra Tul Muntaha	Abdullah Shah	Hangu	BHU Tough Sarai
173	Hina Tahir	Muhammad Tahir	Abbottabad	RHC Kalapani
174	Masrifa Bibi	Abdur Razaq	Bannu	BHU Bada Merabaz
175	Hajira Ali	Muhammad Ali	Battagram	RHC Kuzabanda
176	Alia Gul	Paiave Khan	Bannu	BHU Bada Merabaz
177	Alveena Bibi	Hidayat Ullah	Kohat	BHU Togh Bala
178	Khurshida	Muhammad Rafiq	Mardan	BHU Garhi Ismailzai
179	Hina	Fazal Rahman	Buner	BHU Gokand
180	Nayab Bibi	Sahib Zada	Battagram	BHU Paemal Sharif
181	Afshan	Khadimullah	Abbottabad	RHC Kalapani
182	Mamoona Nawab	Nawab Gul	Battagram	RHC Kuzabanda
183	Zainab Liaqat	Muhammad Liaqat	Battagram	BHU Shingli Payan
184	Hina Robi	Amir Ullah Jan	Battagram	BHU Shingli Payan
185	Rabia Sadia	Abdul Rashid	Mansehra	BHU Bherkund
186	Ayesha Khan	Jehangir Khan	Battagram	BHU Shingli Payan
187	Rida Gul	Ishtiaq Gul	Battagram	BHU Shemali
188	Rukhsar Bibi	Gul Sahib Zada	Dir Upper	BHU Akkhtagram
189	Sayema Habib	Asad	Kohat	RHC Gumbat
190	Lasani	Khurshid Ali	Battagram	BHU Shemali
191	Azra Zulfiqar	Zulfiqar	Haripur	BHU Bagra
192	Erum Safdar	Muhammad Safdar	Haripur	BHU Bagra
193	Lubna Begum	Muhammad Ayaz	Kohat	BHU Togh Bala
194	Shamsa Kanwal	Muhammad Subhan	Battagram	BHU Paemal Sharif
195	Safia	Muhammad Rahim	Battagram	BHU Shemali

12

*[Handwritten signature]*

**Terms & Conditions:**

- 13
1. All selected candidates who have already submitted arrival report are directed to report to Incharge of respective Health Facilities (RHC's & BHU's) within stipulated time period as per Project Policy and the Incharge will forward the arrival reports to District Health Officer concerned for onward submission to PD PMU Primary Revamp Project DGHS KP; in case of failure, the appointment and posting shall automatically stand cancelled and next candidate shall be considered from the waiting list.
  2. All selected candidates are directed to open Bank Accounts in any branch of National Bank of Pakistan (NBP) except Islamic/Aitemaad branches and same may be communicated to PD PMU Primary Care Project DGHS KP for release of salaries.
  3. The appointee shall not be entitled for any TAVDA for posing.

  
**Project Director**  
PMU Primary Care Project  
(24/7 RHC's & BHU's) DGHS, KP

Dated: 07/09/2021

No. 1372-76 /PMU/DGHS

Copy to the:-

- 1- All District Health Officers, (concerned) Khyber Pakhtunkhwa.
- 2- Accounts Section, PD PMU, Primary Care Project DGHS, KP
- 3- PS to Minister Health Khyber Pakhtunkhwa.
- 4- PS to Secretary Health Department Khyber Pakhtunkhwa.
- 5- PA to DGHS, KP.

**Project Director**  
PMU Primary Care Project  
(24/7 RHC's & BHU's) DGHS, KP

*attested*



**Umar Khitab**  
Advocate High Court

Anx B

14



PAKISTAN TELECOMMUNICATION COMPANY LIMITED  
O/O THE Technical Officer SWITCHING OPERATION SWAT

No. PTCL/Employee/2022

Date: 11-01-2022

**Service/Job Certificate**

This is certify that Mr Kishawar Ali s/o Ahmed Jan Resident of Charbagh Swat Is performing duty as Customer support Representative in this Sub Division since 19-8-2002.He is honest ,obedient and hard worker man.

*[Handwritten Signature]*  
Technical Officer (Engg.)  
Switching Operation (PTCL)  
Swat.

The Incharge M/O

Subject: Application For Arrival Report  
BHU Gulibagh

Respected Sir,

With profound request it is stated that I am selected as THV at BHU Gulibagh under PMU Director DG health office KPK Peshawar. Copy order NO 1372-76/PMU/DGHS Dated 7/09/2021 SN. III in list

Kindly accept my arrival and report.

I shall be very thankful to you for your kind act of kindness.

Yours obediently  
Ghazala D/o Mir Zaman Khan  
THV.

Date 8/09/2021

attached

Forwarded To  
DHQ Govt Hospital  
Peshawar  
Please  
Dr. Medical Officer  
B. H. Gulibagh  
9/9/2021

Umar Khitab  
Advocate High Court



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

Ank D

(PMU) Project Management Unit for  
Strengthening of 20 RHC's & 20 BHU's and Construction of 200 RHC's & 20 BHU's  
& Rehabilitation of 20 RHC's and Construction of 20 RHC's & 20 BHU's  
Phone No. 011-2211288

16


**OFFICE ORDER:**

In partial modification of office order No 1372-78/PMU/DGHS dated 07/06/2021 the following posting are made in the best interest of public with immediate effect

S.No	Name	Domicile	From	To
1	Nighat	Swat	BHU Pingal District Dir Lower	BHU Gullibagh District Swat
2	Ghazala	Swat	BHU Gullibagh District Swat	BHU Pingal District Dir Lower

**Terms & Conditions:**

- 1 All selected candidates who have already submitted arrival report are directed to report to incharge of respective Health Facilities (RHC's & BHU's) within stipulated time period as per Project Policy and the incharge will forward the arrival reports to District Health Officer concerned for onward submission to PD PMU Primary Revamp Project DGHS KP; in case of failure, the appointment and posting shall automatically stand cancelled and next candidate shall be considered from the waiting list
- 2 All selected candidates are directed to open Bank Accounts in any branch of National Bank of Pakistan (NBP) except Islamic/Alfamaad branches and same may be communicated to PD PMU Primary Care Project DGHS KP for release of salaries
- 3 The appointee shall not be entitled for any TADA for posting

  
Project Director  
PMU Primary Care Project  
(24/7 RHC's & BHU's) DGHS KP

No. 1384-89 /PMU/DGHS

Dated: 09/09/2021

**Copy to the:-**

- 1 District Health Officers, (concerned) Khyber Pakhtunkhwa
- 2 Accounts Section, PD PMU Primary Care Project DGHS, KP
- 3 PS to Minister Health Khyber Pakhtunkhwa
- 4 PS to Secretary Health Department Khyber Pakhtunkhwa
- 5 C/Os concerned
- 6 PA to DGHS KP

  
Umar Khitab  
Advocate High Court

Project Director  
PMU Primary Care Project  
(24/7 RHC's & BHU's) DGHS KP

BETTER COPY

17

DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR.  
(PMU) Project Management unit for strengthening  
Of all BHU,s across KP and conversion of 200 BHU,s in  
In 24/7 Rehabilitation of all RHC,s and conversion of 50  
RHC,s into 24/7.  
Phone No.091-9212088  
OFFICE ORDER.

In partial modification of office order No.1372-76/PMU/DFGHS Dated 7/9/2021 the following posting are made in the best .

Interest of public with immediate effect.

S.No.	Name	Domicile	From	To
1	Night	Swat	BHU Pingal Lower Dir	BHU Guli Bagh
2	Ghazla	Swat	BHU Gulibagh	BHU Pingal Lower Dir.

Terms & conditions:

1. All the selected candidates who have already submitted arrival report and directed to report to in charge of respective Health Facilities ( RHC,s & BHU,s) with stipulated time period as per project policy and the in charge will forward the arrival reports to District Health Officer concerned for onward submission to PD PMU Primary Revamp Project DGHS KP in case of failure the appointment and posting shall automatically stand cancelled and next candidates shall be considered from the waiting list.
2. All the selected candidates are directed to open Bank Accounts in any branch of National Branch of Pakistan (NBP) except Islamic/Altemaad branches and same may be communicated to PD PMU Primary care project DGHS KP for release of salaries.
3. The appointee shall not be entitled for any TA/DA for posting.

Project Director  
PMU Primary care Project  
(24/7) RHC,s BHU,s) DGHS KP.  
Dated 09/09/2021.

No.1384-89/PMU/DGHS

Copy to the:-

1. District Health officers concerned Khyber Pakhtunkhwa.
2. Accounts Section PD PMU Primary care Project DGHS KP.
3. P.S to Health Minister Khyber Pakhtunkhwa.
4. P.S. to Secretary Health Deptt: Khyber Pakhtunkhwa.
5. Officials concerned.
6. PA to DGHS KP.

Project Director  
PMU Primary care Project

*Umar Khitab*  
**Umar Khitab**  
Advocate High Court

جناب محترم ڈائریکٹر جنرل صاحب محکمہ صحت خیبر پختون خواہ پشاور  
عنوان۔ درخواست برائے رہنمائی

جناب عالی۔ سالکہ ذیل عرض کرتی ہے۔

(1) یہ کہ اپیلانٹ کی تقرری ڈی۔ ایس۔ سی۔ (محکمہ چناؤ کمیٹی) کے  
تحت بحوالہ تقرری نمبری 1372-76/PMU/DGHS محررہ نمبر  
07/09/2021 کو بحیث لیڈی ہیلتھ ویزنٹریسک ہیلتھ یونٹ گلی باغ  
تحصیل چارباغ میں ہوئی ہے۔

(2) یہ کہ سالکہ محررہ 07/09/2021 کو چارج لیکر ڈیوٹی شروع کی۔

(3) یہ کہ تقرری حکمنامہ کے شرط میں یہ واضح لکھا گیا ہے کہ تقرری Non transferable  
کے شرط پر ہوگا۔

(4) یہ کہ سالکہ کے تبادلہ چارج لینے کے دو دن بعد سیاسی بنیادوں پر ضلع سوات سے  
بیسک ہیلتھ پیٹنگل ضلع لوژر ڈیر یونٹ کو بحوالہ نمبری 1384-89/PMU/DGHS محررہ  
09/09/2021 کو ہوئی ہے۔

(5) یہ کہ سالکہ کو سیاسی بنیادوں پر نشانہ بنائی گئی ہے۔ جو کہ سالکہ کے ساتھ  
زیادتی ہے۔ جو کہ تبادلہ کے حکمنامہ سے ظاہر ہے۔

(6) یہ کہ سالکہ کے تقرری سے ظاہر ہوتا ہے۔ کہ سالکہ کے تقرری اور پوسٹنگ  
میرٹ پر ہوئی تھی۔

(7) یہ کہ محکمہ نے خود اپنے تقرری کے شرائط سے انحراف کیا ہے۔ کہ Non Transferable  
کے شرط کے باوجود دو دن بعد سالکہ کی تبادلہ سیاسی بنیادوں پر کی گئی ہے۔

(8) یہ کہ سالکہ نے اکتوبر کے پہلے ہفتے میں بیسک ہیلتھ پیٹنگل لوژر ڈیر میں arrival رپورٹ  
کیا تھا۔ لیکن ڈیوٹی پر موجود میڈیکل افسر نے Arrival لینے سے انکار کیا۔

(9) یہ کہ سالکہ اب بھی بیسک ہیلتھ یونٹ گلی باغ سوات میں ڈیوٹی سرانجام دی رہی ہے۔

ساتھ تعاون کرے خود بہ کام انجام دے۔

جناب عالی۔ اگر آپ صاحبان کے اختیار میں ہو اور قانونی روکاٹ نہ ہو تو میرے ارسال کردہ

اپیل کو منظور فرما کر مشکور مہمائے۔ مجھے امید ہے کہ آپ صاحبان عورت ذات کو عزت دے یئگے

البد

عمر خطاب ایڈوکیٹ ہائی کورٹ پشاور اور القضا منگورہ بیچ سوات۔

موبائل نمبر 9524854-0345 مورخہ 02/11/2021



لہذا استدعا ہے کہ سائلہ کی درخواست رہنمائی پر غور فرما کر مشکور فرمائیں

19

العبد

غزالہ

Lady Health Visitor BHU Guli Bagah Swat

کاپی کے نقول مندرجہ ذیل دفاتر کو ارسال کی جاتی ہیں

(1) ڈسٹرکٹ ہیلتھ افسر لوڈیر۔

(2) ڈسٹرکٹ ہیلتھ افسر سوات۔

غزالہ العبد  
غزالہ

لیڈی ہیلتھ ویزٹنگ باغ سوات۔

مورخہ۔ 09/12/2021

رجسٹری غسری 766106998  
15/12/2021

Receipt No. 15  
15/12/2021

جناب محترم سکریٹری صاحب محکمہ صحت خیبر پختون خواہ پشاور  
عنوان۔ محکمانہ اپیل برخلاف تبادلہ آرڈر نمبری 1384-89/PMU/DGHS

محررہ 09/09/2021

جناب عالی۔ اپیلانٹ ذیل عرض کرتی ہے۔

(1) یہ کہ اپیلانٹ کی تقرری ڈی۔ ایس۔ سی۔ (محکمانہ چناؤ کمیٹی) کے

تحت بحوالہ تقرری نمبری 1372-76/PMU/DGHS محررہ نمبر

07/09/2021 کو بحیث لیڈی ہیلتھ ویژنر بیسک ہیلتھ یونٹ گلی باغ

تخصیص چار باغ میں ہوئی ہے۔

(2) یہ کہ اپیلانٹ محررہ 07/09/2021 کو چارج لیکر ڈیوٹی شروع کی۔

(3) یہ کہ تقرری حکمانہ کے شرط میں یہ واضح لکھا گیا ہے کہ تقرری Non transferable

کے شرط پر ہوگا۔

(4) یہ کہ اپیلانٹ کے تبادلہ چارج لینے کے دو دن بعد سیاسی بنیادوں پر ضلع سوات سے

بیسک ہیلتھ چنگل ضلع لوئر ڈیر یونٹ کو بحوالہ نمبری 1384-89/PMU/DGHS محررہ

09/09/2021 کو ہوئی ہے۔

(5) یہ کہ اپیلانٹ کو سیاسی بنیادوں پر نشانہ بنائی گئی ہے۔ جو کہ اپیلانٹ کے ساتھ

زیادتی ہے۔ جو کہ تبادلہ کے حکمانہ سے ظاہر ہے۔

(6) یہ کہ اپیلانٹ کی تقرری سے ظاہر ہوتا ہے۔ کہ اپیلانٹ کی تقرری اور پوسٹنگ

میرٹ پر ہوئی تھی۔

(7) یہ کہ محکمہ نے خود اپنے تقرری کے شرائط سے انحراف کیا ہے۔ کہ Non Transferable

کے شرط کے باوجود دو دن بعد اپیلانٹ کی تبادلہ سیاسی بنیادوں پر کی گئی ہے۔

لہذا استدعا ہے کہ اپیلانٹ کے اپیل کو منظور کر کے تبادلہ کے حکمانہ

نمبری 1384-89/PMU/DGHS محررہ 09/09/2021 کو کینسل کر کے

اپیلانٹ کے ساتھ زیادتی کا ازالہ کرے۔

غزالیہ  
العبد

Lady Health Visitor BHU Guli Bagah Swat

Dated 04/11/2021


رجسٹری جنرل - 76623246

146

5/11/2021

 <p>بار کونسل نمبر: 18-1058 بار ایسوسی ایشن نمبر: 373</p>	 <p>88130</p> 
<p>رابطہ نمبر: 03459524854</p>	<p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>

بعدالت جناب: یو جی آر ایئر بیسٹل ضیبتہ تختونخواہ کیس کے لیے مقامی طور پر کٹہہ لگایا

<p>منجانب: ایم پلانٹ</p>  <p>مح غمضہ الیٰ بنام ری پبلک سوات</p>	<p>دعویٰ اور خواست:</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
---	--

**بابت تحریر آگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام کٹہہ کیلئے عرصہ اختتام الیٰ روکٹ کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمزارہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرواختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سند ہے

مقام کٹہہ ایئر بیسٹل سوات کے لئے منظور ہے۔

ایڈووکیٹ دستخط: Umar Whitab Advocate High Court

المقوم: