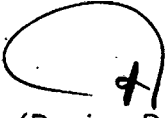


26.07.2022

Appellant present through counsel.

Naseer Ud Din Shah, learned Assistant Advocate General for respondents present.

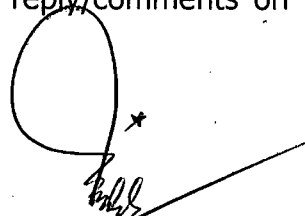
Files to come up alongwith connected Service Appeal No.424/2022 titled "Mst. Sadia Vs. Government of Khyber Pakhtunkhwa" on 28.09.2022 before S.B.


(Rozina Rehman)
Member (J)

28.09.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Saeed Muhammad, Litigation Officer and Mr. Safiullah, Focal Person for the respondents present.

Reply/comments on behalf of respondents No. 1 & 2 submitted which are placed on file. Copy of the same is handed over to learned counsel for the appellant. Reply/comments on behalf of respondent No. 3 are still awaited. Representative of the respondent requested for time to submit reply/comments. Adjourned. To come up for reply/comments on behalf of respondent No. 3 on 02.12.2022 before S.B.


(Mian Muhammad)
Member (E)

14.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 09.06.2022 before S.B.

Rs-500/-
Appellant Deposited
Security & Process Fee

A. M. Hashmi
12/5/22

(Rozina Rehman)
Member (J)

09.06.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Muhammad Usman Assistant for respondents present.

File to come up alongwith connected Service Appeal No.424/2022 titled Mst. Sadia Vs. Government of Khyber Pakhtunkhwa on 26.07.2022 before S.B.




(Rozina Rehman)
Member (J)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 7805/2021 _____

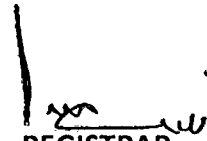
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/11/2021	<p>The appeal of Mr. Khalid Zia resubmitted today by Mr. Bashir Khan Wazir Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>17/01/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	17.01.2022	<p>Learned counsel for the appellant present and requested for adjournment on the ground that he has not prepared the brief. Request acceded to. To come up for preliminary hearing on 04.02.2022 before S.B.</p> <p style="text-align: right;">(Mian Muhammad Member (E)</p>
	04.02.2022	<p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 14.04.2022 for the same as before.</p> <p style="text-align: right;"> Reader</p>

The appeal of Saif Ullah Khan, JCT Pharmacy (BPS-12), North Waziristan received today i.e. on 16.11.2021 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

1. Appeal has not been flagged/marked with annexure marks.
2. Address of the appellants is incomplete.
3. Copy of Impugned Order dated 06/08/2021 mentioned in the heading of the appeal is not attached with the appeal.
4. Impugned order was passed on 06/08/2021, departmental appeal was made/preferred on 21/07/2021 much before passing the impugned order meaning thereby that there is no departmental appeal.
5. Memorandum of the appeal is not signed by the appellants.
6. Annexures of the appeal may be attested.
7. Affidavit is not attested by the Oath Commissioner.
8. Certificate be given to the effect that appellants has not been filed any service appeal earlier on the subject matter before this Tribunal.

No. 2271 /S.T,

Dt. 16/11 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bashir Khan Wazir Adv. Pesh.

As per objection no 3 the salaries of the Appellant was verbally stopped by the DHO since 1st June 2021 against which the departmental appeal was filed and the order dated 06-08-2021 has been issued late on the basis of which salaries of the colleagues of the Appellant has also been stopped, therefore this order was not issued against the Appellant.

The Rest of the objections are also removed Resubmitted again.

counsel



Dated: 25-11-2021

Reply to the objection NB3 the date mentioned
and the heading of prayer is not issued
against the appellant and the salaries
of the appellant was verbally stopped
wherefore the departmental appeal was filed
against the verbal order and appellant
agreed from the 1st June 2011 Order
hence 1st page has been replaced
while corrected the same.

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 7804 /2021

Safiullah Khan, JCT Pharmacy (BPS-12), North Waziristan.....(Appellant)

Versus

Through Secretary Health & others.....Respondents

INDEX

S.#	Particulars	Annexure	Page
1	Para-wise Comments.		1-3
2	Notification dated 22.04.2021.	A	4
3	Affidavit		5
4	Authority letter.		6

Respondent No. 2.

DHC North Waziristan

①

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

Service Appeal No. 7804 /2021

Safiullah Khan, JCT Pharmacy (BPS-12), North Waziristan.....(Appellant)

Versus

Through Secretary Health & others.....Respondents

Joint Para-wise comments on behalf of respondents No. 1, 2

Preliminary objections.

1. That the appellant has got neither cause of action nor did locus standi to file the instant appeal, as he has filed no departmental Appeal.
2. That the appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant appeal is against the prevailing Law and Rules.
4. That the appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the appellant has filed the instant appeal with mala-fide intention, hence liable to be dismissed.
6. That the appellant has not come to the Honorable Tribunal with clean hands.
7. That the Honorable Tribunal has no jurisdiction to adjudicate upon the matter.
8. That the instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.
9. That the appeal is badly barred by law and limitation.
10. That the appellant is not "AGGRIEVED" person within the meaning of Article 199 of the Constitution of Pakistan by producing fake, bogus and fabricated appointment order.

ON FACTS:

1. Pertains to record and Para No.1 needs no comments.
2. Incorrect. The appellant has never appeared for test/interview and never selected on any post under the control of answering respondents. The

6

OFFICE OF THE DISTRICT HEALTH OFFICER
NORTH WAZIRISTAN TRIBAL DISTRICT MIRANSHAH.

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

Email: agency surgeon wtd 2019@gmail.com

No.

/Litigation/Court Case, Dated Miranshah the 05/08/2022.

AUTHORITY LETTER.

Mr. Syed Muhammad Litigation Assistant attached to this office is hereby fully authorized to attend the Khyber Pakhtunkhwa Service Tribunal Peshawar on behalf of the undersigned as representative of Health Department North Waziristan Tribal District in Service Appeal No. 7804 /2021.

N.B:- TA/DA will be paid by this office as per Government rules.

SD/x x x
District Health Officer,
North Waziristan Tribal District.

No. 7203-4 /Litigation/Court Case,
Copy forwarded to:-

1. The Additional Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. Mr. Syed Muhammad Litigation Assistant of this office.


District Health Officer,
North Waziristan Tribal District.

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

Service Appeal No 7804 /2021

Safiullah Khan.....Appellant

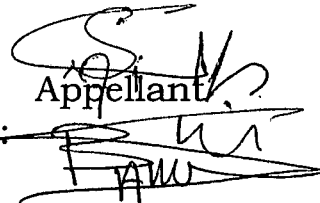
VERSUS

Director General Health Services & others ...Respondents

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal	-	1-4
2.	Affidavit	-	5
3.	Application for Suspension	-	6-7
4.	Affidavit	-	8
5.	Copy of Appointment Order	A	9.
6.	Copy of the Medical and Arrival report	B	10-20
7.	Copy of Writ Petition and Judgment	"C"	21-31
8.	copy of the Order dated 05.05.2020	"D"	32.
9.	Copy of Departmental Appeal	"E"	33-34
10.	Wakalat Nama		35

Through:


Appellant

(BASHIR KHAN WAZIR)

Advocate,

High Court, Peshawar

Dated:- 28.10.2021

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

Service Appeal No _____/2021

Safiullah Khan, JCT Pharmacy (BPS-12), North Waziristan.

.....Appellant

V E R S U S

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar
2. District Health Officer, District North Waziristan.
3. Secretary Health, Govt of Khyber Pakhtunkhwa, Peshawar.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED ORDER, WHEREBY THE
SALARIES OF THE APPELLANT WAS STOPPED
SINCE 1ST JUNE 2021 AND DESPITE OF THE
MANDATORY PERIOD EXPIRED OF
DEPARTMENTAL APPEAL THE RESPONDENT DID
NOT RELEASE THE SALARIES OF THE
APPELLANT.**

Prayer in Appeal:

On acceptance of the instant Appeal, the Impugned Orders when initially the salaries of the Appellant was stopped/withheld since 1st June 2021 verbally stopped / withheld, the Appellant got the knowledge after 1st July, the impugned order and withholding of salary of the Appellant may kindly be set aside and consequently the outstanding salaries of the Appellant may kindly be released, till date.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973..
2. That the Appellant being competent and having the meritorious qualification was appointed as Junior Clinical Technician (JCT) BPS-12 on the recommendation of Departmental Selection Committee.

(Copy of Appointment Order is attached as annexure A)

3. That after his appointment the Appellant got Medical as well as assumed the charge of the subject post and was continuously performing his duty with great zeal and zest, therefore he was being paid salaries as per his duty. **(Copy of the Medical and Arrival report are attached as annexure B)**

4. That the Appellant was being appointed in the Erstwhile FATA and he was posted at DHO Office North Waziristan and the salaries of the employees of Erstwhile FATA was in manual position, meanwhile due to the Operation Zarb e Azab, the inhabitant of North Waziristan were badly affected, consequently the people of the locality migrated to different districts and the Govt offices were also badly affected.

5. That after the rehabilitation of the District North Waziristan the salaries of the number of employees were stopped on the reasons of non-computerization. The salary of the Appellant was also stopped / withhold and the Appellant time and again submitted his Appeal before the competent authority but lastly when the Appellant along with his other colleagues were got helpless, thereafter the Appellant along with his other colleagues have filed a Writ Petition No. 7299/2019 at Peshawar High Court Peshawar, in which Interim Relief was granted and the case was sent to the Peshawar High Court Bannu Bench being in the Jurisdiction of the Circuit Bench, whereby the Writ Petition was modified as WP No. 1308-B/2019. The Comments were called which was received to the Peshawar High Court Bannu Bench and after hearing both the parties, the Writ Petition of the Appellant along with other colleagues was allowed with the directions to the Respondents to release the salaries of the Appellant along with his other colleagues from date of stoppage. **(Copy of Writ Petition and Judgment is attached as annexure C)**

6. That the office of Respondent No 2 being the competent authority issued an office order No 2306-9 on dated 05.05.2020, vide which the salaries of the Appellant along with his other colleagues have been released. **(copy of the Order dated 05.05.2020 is attached as annexure D)**

7. That since then the Appellant is performing his duty with great zeal and zest on his subject post and after almost one year the salaries of the Appellant once again stopped by the Respondent No 2 verbally without having any plausible reasons, the Appellant salary is stopped /withheld from the 1st June 2021 till date and in this respect the Appellant was got the knowledge when he checked his salary in Bank in the month of July, thereafter the Appellant submitted his Appeal before the Competent Authority, but without fruitful result. **(Copy of Departmental Appeal is attached as annexure E)**
8. That the Appellant time and again visited to the office of Respondents and also requested to decide his departmental Appeal, but despite of the mandatory period of his departmental Appeal no order whatsoever has been passed by the Respondents.
9. That feeling aggrieved from the act of Respondents, having no other adequate and efficacious remedy, approaches this Honourable Tribunal on the following grounds inter-alia:-

GROUND:-

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules and guidelines provided by the apex courts that when the employee serving on respective post the competent authority should have in retaliation to delivered remuneration to the employee as accordance his service, while in the instant case the respondents have not yet been considered the case of the Appellant, is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- C) That the fundamental rights of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- D) That the Appellants is appointed according to rules and on adopted procedure but the respondents and after his appointments he has never ever given an opportunity of any complaint to the respondents and performed his

C.D.

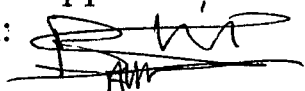
duties with full devotions, the Appellants being eligible for releasing of outstanding salaries which was illegally been retained by the respondents is illegal and violation of natural justice, because of the fundamental rights/entitlement of the Appellants has been denied to them by the Respondents.

- E) That according to the articles 23 & 24 (1) of the constitution of Pakistan the property of every citizens of the Pakistan have been protected and no one could be deprived from their due rights and property, hence the entire due salaries being the fundamental right of the Appellants and the respondents is liable to be directed for releasing of the entire due salaries of the Appellants.
- F) That once the Appellants was duly appointed/posted and was allowed to join the service, after thorough verifications entries was also made in his service books, since then he is performing his duties, and after having performed his duties, he is certainly entitled to be paid his salaries, but all of sudden the respondents have been stopped the salaries of the Appellants, these acts of the respondents are illegal unlawful and liable to be declared so.
- G) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that, On acceptance of the instant Appeal, the Impugned Orders when initially the salaries of the Appellant was stopped/withheld since 1st June 2021 verbally stopped / withheld, the Appellant got the knowledge after 1st July, the impugned order and withholding of salary of the Appellant may kindly be set aside and consequently the outstanding salaries of the Appellant may kindly be released, till date.

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Appellant,
Through: 
(BASHIR KHAN WAZIR)
Advocate,
High Court, Peshawar

Dated:- 28.10.2021

3

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

Service Appeal No _____/2021

**Safiullah KhanAppellant
VERSUS**

**Director General Health Services & others ...Respondents
AFFIDAVIT**

I, Safiullah Khan, JCT Pharmacy (BPS-12), North Waziristan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

6

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

Service Appeal No _____/2021

**Safiullah KhanAppellant
VERSUS**

Director General Health Services & others ...Respondents

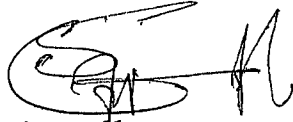
**APPLICATION FOR SUSPENSION OF THE
IMPUGNED Verbal ORDER, WHEREBY THE
SALARIES OF THE APPELLANT WAS
STOPPED SINCE 1ST JUNE 2021 AND IN THE
LIGHT OF SAID ORDER THE SALARIES OF
THE APPELLANT HAS BEEN STOPPED /
WITHHELD AND CONSEQUENTLY THE
CURRENT SALARY OF THE APPELLANT MAY
KINDLY BE ORDERED TO RELEASED, TILL
THE FINAL DECISION OF THE SERVICE
APPEAL.**

Respectfully Sheweth:

1. That the above noted Service Appeal is being filed before this hon'ble court, in which no date of hearing has yet been fixed.
2. That the Appellant has got a good prima facie case in their favour, and is sanguine about its success.
3. That the balance of convenience also lies in favour of the Appellant.
4. That if the Impugned Order dated 25.06.2021 is not suspended, the Appellant would suffer extreme irreparable loss.
5. That the facts and grounds of the Appeal may kindly be read as an integral part of this application.

7

It is, therefore, respectfully prayed that on acceptance of this application, the relief as prayed for in the heading of the Application may kindly be allowed in favour of the Appellant, till the final decision of the case.



Appellant

Through:



(BASHIR KHAN WAZIR)

Advocate,

High Court, Peshawar

Dated:- 28.10.2021

8

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

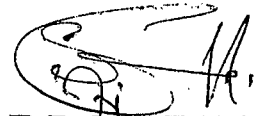
Service Appeal No _____/2021

**Safiullah KhanAppellant
VERSUS**

Director General Health Services & others ...Respondents

AFFIDAVIT

I, Barkat Ullah Khan, JCT Pharmacy (BPS-12), North Waziristan, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

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

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

OFFICE ORDER:

On the recommendation of Departmental Selection committee, Mr. Safiullah S/O Nageebullah Khan resident of village Kotka Daulat Khan Tehsil & District Bannu & P/O Sikandar Khel Bala is hereby appointed as a JCT (Pharmacy) in BPS-09 (6200-380-17600) plus usual allowances as admissible under the rules against the existing vacant post at Civil Dispensary Gari Kot Kerkenwam North Waziristan Agency in the best interest of public services with immediate effect.

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

- 1- He is declared medically fit for this job.
- 2- His appointment will be purely on contract /temporary basis and are liable to be terminated at any time without assigning any notice/reasons.
- 3- He will be governed by such rules and order issued by the Government from time to time for the category of staff to which he belongs.
- 4- If he wished to resign the services a prior notice of 30 days will be submitted, otherwise one month pay should be deposited in Government treasury through challan.
- 5- His pay will be released after the verification of all the documents from the required Board /Faculty according to the Government rules.
- 6- He will not be entitled for any TA/DA for joining the service.
- 7- If he accepts the above terms and condition he will have to report for duty to the Incharge Civil Dispensary Gari Kot Kerkenwam within 15 days of the receipt of this offer, otherwise the order will be considered as cancelled.

Sd:xxxxxxxxxxxx
Agency Surgeon
North Waziristan Miranshah

No 2709-12 / App: dated: Miranshah the: 02-11-2013.

Copy forwarded to the:-

1. Agency Account officer North Waziristan Miranshah.
2. Accounts/Pay Bill Clerk of this office.
3. Incharge Civil Dispensary Gari Kot Kerkenwam.
4. Official concerned.

For information and necessary action.


Agency Surgeon
North Waziristan Miranshah

10

SS&RD.NWFP-27IS-2000 P of 100/23-7-98- (16)

N.W.F.P. Med No. 3

MEDICAL CERTIFICATE

Name of Official Sazi ullah Khan
 Caste or race Muslim
 Father's Name Naigeeb ullah Khan
 Residence Kotka Daulat Khan District
Rawal
 Date of Birth 04-03-1992
 Exact height by measurement 5'-4"
 Personal Mark of Identification nil
 Signature of the Official Sazi ullah Khan
 Signature of head of Office _____

FORGON


Seal of Office


I do hereby certify that I have examined Mr./Miss. Sazi ullah Khan
 Candidate for employment in the Office of the Health Department
 And can not discover that he/she had any disease communicable or other constitutional effect join or
 bodily infirmity except nil

I do not consider this as disqualification for employment in this office of the
Health Department his/her age according to his own statement 28
 Years and by appearance about twenty eight only years.

LEFT HAND THUMB AND FINGER

IMPRESSION 03/12/2007


 Agency Surgeon
 North Waziristan Agency

nearby...

11

To

The Agency Surgeon,
North Waziristan Agency Miranshah.

Subject: Arrival Report.

R/Sir,


In compliance with the Agency Surgeon, NWA office order
No. 2709-121 dated 22/10/ 2013.

I have the honour to submit herewith my arrival report for duty as a

JCT (Pharmacy) BPS-12 today on 03/11/2013

FN.

Dated: 03/11/2013
Seen.


Safiullah
JCT (Pharmacy) BPS-12

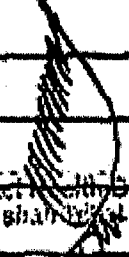



Thanks

Yours Obediently,
Safiullah
JCT (Pharmacy) BPS-12

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.

10. Signature and designation of the Head of the Office or other attesting officer
 (Signature)
 Head of the Office
 Police Station
 9. Signature of Govt. Servant
 (Signature)
 Fore Finger
 (Signature)
 Ring Finger
 (Signature)
 Middle Finger
 (Signature)
 Thumb
 (Signature)
 Little Finger
 (Signature)
 8. Left hand/right hand thumb and finger impressions of (non-gazetted officer)
 (Signature)


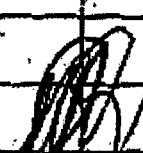

1. Name(s) Mr. Sathish Kumar
 2. Nationality and Religion Indian
 3. Residence K. V. R. Street, District Bangalore
 4. Father's name and residence No. 9, 1st St. Near
 5. Date of birth by Christian era as nearly as can be ascertained 04-03-1992
 6. Exact height by measurement 5' 4"
 7. Personal mark of identification
 12

9 Signature and designation of the Head of the office or other attesting officer, in attestation of column 1 to 8. وختلا السرحد	10 Date of termination or appointment. تاریخ انقطاع ملازمت	11 Reason of termination (Such as promotion, transfer, dismissal, etc.) انقطاع ملازمت ترقی چارول یا طرفی	12 Signature of the head of the office or other Attesting officer. وختلا السرحد	13 Nature and duration of leave taken. رفقت کی نوعیت دو مہینہ	13 Allocation of period of leave of average pay up to four months (or earned leave next exceeding 120 days) to which leave salary is debitable to another Government. ہوا ایک ماہ رخصت کے لئے اور باقی 120 دنوں کے Period Period Government to which debitable کریڈٹ کریڈٹ	14 Signature of the Head of the office or other attesting officer. وختلا السرحد	15 Reference to any recorded punishment or censure, reward or praise of the Government servants. سزا یا پیرسب کا کردگی کا ریکارڈ
<i>3rd 2018</i>		<i>Annual increment</i>	<i>Annual increment</i>		<i>Leave earned upto and for 2018</i>		
		<i>District Head Miranshah</i>		<i>17</i>			<i>District Head Miranshah Distt:</i>
					<i>Pay Release for Jul, 2021 Drawn Pay & Salary for June 2021 P=33375</i>		
						<i>DA</i>	
							

8 Signature of Government servant	7 Date of appointment	6 Other amount falling under the term pay	5 Additional pay for officiating	4 Pay in substantive position	3 If officiating (including appointment or promotion or transfer) (a) without service counts for pension under rule 5.90 of G.S.R. (P.S.) Volume II	2 Whether substantive or officiating and whether permanent or temporary	1 Name of Post
S.S. 518/1511	21/11/58	1500/-	1500/-	1500/-	1500/-	1	1518/50
<p>805-9 (800-380-17600) Pay @ 2nd Rs. 658/00m</p>							
<p>805-9 (8015-485-2280) Pay @ Rs. 658/00m</p>							

15

9 Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8 دستخط افسر مجاز	10 Date of termination or appointment تاریخ انتقال ملازمت	11 Reason of termination (Such as promotion, transfer, dismissal) وجوہات انتقال ملازمت ترقی تدارک یا دوسری طرح	12 Signature of the head of the office or other Attesting officer دستخط افسر مجاز	13 Nature and duration of leave taken رضت کی نوعیت دو معیار	13 Allocation of period of leave of average pay up to four months (or earned leave next exceeding 120 days) to which leave salary is debitable to another Government. پارہ 14 کی رضت کے لئے ادرسہ گزارا جائے گا Period گرمہ Government to which debitable گورنمنٹ مقام	14 Signature of the Head of the office or other attesting Officer دستخط مجاز	15 Reference to any recorded punishment or censure, reward or praised of the Government servants سزا یا جزا یا غیر مناسب کارکردگی کا ریکارڈ
30/11/25		Allowed Annual retirement			Service verified up and to 30/11/25		
North West Frontier Agency Mirza Shah		North West Frontier Agency Mirza Shah			North West Frontier Agency Mirza Shah		
<p>The post has been upgraded from BPS-9 to BPS-12 vide General Deptt. (Regularization) 14/12-2012 taken into effect from 7-3-2011. Parameters dated 11-8-2015 pay fixed in existing pay Bps-9 Rs. 9000/pm pay fixed in Revised BPS-12 Rs. 9750/pm</p>							
<p>Revised Basic pay scale 2016 w.e.f. From 1-7-2016</p>							
North West Frontier Agency Mirza Shah					North West Frontier Agency Mirza Shah		

9	10	11	12	13		14	15	
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (Such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave next exceeding 120 days) to which leave salary is debitable to another Government		Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praise of the Government servants
دستخط انسرجاز	تاریخ انقطاع ملازمت	دلیل انقطاع ملازمت ترقی یا تبادلہ یا دیگر	دستخط انسرجاز	رضعت کی نوعیت و معیار	Period عرصہ	Government to which debitable آزاد کشمیر گورنمنٹ	دستخط انسرجاز	سزا یا تعمیر کارکردگی دیکھو
<p>In the Office of Registrar High Court, Bannu Bench vide his Judgment dated 26/2/2020 The pay of Mr. Barkatullah, is hereby released from the date of stoppage vide NWFD Office order No. 2306-91 Settlement/Release dated 05/05/2020.</p>								
 District Health Officer Mirancheh Tribal Distt.				 District Health Officer Mirancheh Tribal Distt.				
<p>Drawn Rs. 325778/2 w.e.f 1st Feb to 31/12/2018 in A/c of pay and allowance in the light of Registrar High Court Bannu Bench Judgment dated 26/2/2020.</p>								
<p>T-201 21/1/2020</p>								
<p>Drawn Pay and Allowance from Jan 2020 to Feb 2020 Rs. 32578/2</p>						 District Accounts Officer Mirancheh		

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other attending officer in execution of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other attending officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 126 days) to which leave salary is debtable to another Government	Signature of the Head of the office or other attending Officer	Reference to any recorded punishment or censure, reward or praise of the Government Servants
دستخط انسریاز	تاریخ انقطاع ملازمت	دعوت انقطاع ملازمت ترقی تادیب یا بطرف دیگر	دستخط انسریاز	رضعت کی نوعیت وسمیاد	Period ۶ ماہ Government to which debtable حکومت کو مستحق ہوگا	دستخط انسریاز ہزار	سزا یا تعمیر کامیابی کا ریکارڈ
<p>In the light of Rajasthan High Court vide its judgement order dated 26/2/2020 and DRS merged A/c of Rajasthan vide No. 8405/DUS-M/111 dated 20-04-2020. The pay of Mr. Subhakar Khan Dikshitar is hereby released from the date of stoppage vide DUS NW D.O. order No. 2306-09/A/1087/1088/1089 dated 15/05/2020.</p>							
<p>District Head Officer Muzaffargarh</p>				<p>District Head Officer Muzaffargarh</p>			
<p>¹² Drawn Rs. 205775/- w.e. 15/12/19 in A/c of pay and allowances in the light of Rajasthan High Court Bench judgement dated 26/2/2020</p>							
<p>T-200 26/12</p>							
<p>Drawn pay and allowances Jan 2020 to Feb 2020 Rs. 302575/-</p>							
<p>District Accounts Officer Muzaffargarh</p>						<p>District Accounts Officer Muzaffargarh</p>	

BEFORE THE HONOURABLE PESHAWAR HIGH COURT

PESHAWAR

ATTESTED

EXAMINER
Peshawar High Court

Writ Petition No 7299 of 2019

1. ✓ Nisar Ahmad S/o Muhammad Subhan R/o House No 419 Street No 10, Phase-VII Hayatabad Peshawar.
2. ✓ Noor Shahideen S/o Reshmeen Gul R/o House No 188 Street No 9, F-1 Phase-6 Hayatabad Peshawar
3. ✓ Saif ud Din S/o Awal Khan R/o Canal Road, Khalil Street University Town Peshawar.
4. ✓ Muhammad Firdous S/o Bazid Khan R/o Village Hasu Khel, Tehsil & P.O Meer Ali North Waziristan Agency.
5. ✓ Khalida Zia D/o Samad Shah R/o Village Khadi Tehsil & P.O Meer Ali North Waziristan Agency.
6. ✓ Saleem Ullah S/o Bilawal Khan R/o Village Dawar Tappi Tehsil & P.O Meeran Shah North Waziristan.
7. ✓ Najeeb Ullah S/o Konawas Khan R/o Hamzoni Ali Khel Tehsil & Po Miranshah North Waziristan.
8. Miss Noreen Naz D/o Naimat Ullah R/o Village Hasukhel Tehsil & P.O Mirali North Waziristan.
9. ✓ Nasir ud Din S/o Awal Khan R/o Village Palangzai Bora Khel Tehsil & P.O Miranshah North Waziristan.
10. ✓ Zia ud Din S/o Rehmat Ullah R/o Village Eidak Tehsil Mirali North Waziristan.
11. ✓ Islam Ullah S/o Haji Saley R/o Village Eidak Tehsil Mir Ali North Waziristan.
12. ✓ Mujahid Shah S/o Muhammad Usman R/o Village Mubarak Shahi Tehsil Mirali North Waziristan.
13. ✓ Gul Nasib S/o Wali Subhan R/o village Eidak Tehsil Mir Ali North Waziristan.

District Health Officer
Mirali North Waziristan

wp/299 2019 Nisar Ahmad vs Govt full USD 91 PG

ATTESTED
EXAMINER
Peshawar High Court

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- 22
- Miss Bushra Noreen D/o palol Khan R/o village Asad Khel
tehsil Dossali North Waziristan.
15. Safi Ullah Khan S/o Naqeeb Ullah Khan R/o canal Road,
Opp Al-badar Hospital University Town, Peshawar.
16. Barkat Ullah Khan S/o Asmat Ullah Khan R/o Gulberg No
1, Peshawar Cant Saddar.
17. Mehboob Alam S/o Marwat Khan R/o Fazal Haq Malwana.
Suranni Bannu.
18. Waseema Tahir W/o Imran Khaliq R/o Village Eidak Tehsil
Mir Ali North Waziristan.
19. Mst Hafsa W/o Bakhtali Khan R/o Village Hamzoni
Patikhel Tehsil Miranshah North Waziristan.
20. Salim Ullah S/o Abdul Quadeer R/o Village Haider Khel
Tehsil Mirsali District North Waziristan.
21. Muhammad Iddress S/o Muhammad Khan r/o District
Lakki Marwat.
22. Rashid Ullah S/o Sher Qader R/o Village Darpa Khel Tehsil
Miranshah North Waziristan.
23. Ameer Ullah S/o Peer Muhammad Khan R/o District North
Waziristan

..... Petitioners

VERSUS

1. Government of Khyber Pakhtunkhwa Through director
Health Services Merged areas, Khyber Pakhtunkhwa
Peshawar.
2. District Health Officer, District North Waziristan.
1. District Account officer, District North Waziristan.

..... Respondents.

WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973 .AS
AMENDED UP TO DATE

ATTESTED

EXAMINER
Peshawar High Court

Dist. Health Officer
Miranshah



wp7299 2019 Mjshr Almad vs Govt full USB 9 | PG

with Seal/Signer

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PESHAWAR HIGH COURT, PESHAWAR.

ORDER SHEET

Date of Order/ Proceedings	Order or other Proceedings with Signature of Judge.
03/01/2020	<u>W/P No. 7299-P/2019</u>
	<u>Present:</u> Mr. Bashir Khan Wazir, Advocate, for the petitioners.
	==== Comments be called from respondents so as to reach this Court within fortnight.
	<u>Interim Relief</u>
	Notice for a short date. In the meanwhile, the respondents are directed to release salaries of the petitioners immediately, if they perform their duties.
	<u>Chief Justice</u>
	
	<u>Judge</u>
No. <u>20540</u> Date of Presentation of Application <u>04/11/2020</u> No of Pages <u>11-7</u> Copying fee <u>18</u> Total Date of Preparation of Copy <u>06/11/2020</u> Date of Delivery of copy <u>06/11/2020</u> Received By <u>[Signature]</u>	 CERTIFIED TO BE TRUE COPY EXAMINER Peshawar High Court, Peshawar Authorized Under Article 117 of the Constitution of Pakistan 06 JAN 2020


 Date: 06/11/2020
 with CamScanner

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JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT,
BANNU BENCH.

(Judicial Department)

W.P No. 1308-B of 2019.

Nisar Ahmad & others
Vs
Govt. of Khyber Pakhtunkhwa
and others

JUDGMENT

Date of hearing :- 26-02-2020

Petitioner by: Mr. Bashir Khan Wazir advocate.

Respondent by: Mr. Shahid Hameed Qureshi Addl: A.G.

9

SAHIBZADA ASADULLAH, J.- Through the instant Writ Petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioners Nisar Ahmad and others have invoked the Constitutional Jurisdiction of this Court, praying that:-

"It is therefore, most humbly prayed that on acceptance of this Writ Petition an appropriate Writ may please be issued declaring that petitioners have been validly appointed on their respective vacant posts, the petitioners are still working against the said posts with no complaint whatsoever,

ATTESTED
EXCISE
Peshawar High Court
Bannu Bench

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the respondents reluctant from release of the due salaries of the petitioners since April 2015 till now, the acts and conduct in respect of withholding of salaries of the petitioners, is illegal, unlawful, without lawful authority and of no legal effect, the same is liable to be struck down, the petitioners are also entitled their due and order to be released the entire outstanding salaries of the petitioners and further they may be restrained from do so in future.

Any other relief, not specifically asked for may also graciously be extended in favour of the petitioner in the circumstances of the case.

2. Briefly stated the facts giving rise to the instant writ Petition are that the petitioners were appointed by the respondents in 2013; that later on they applied against the vacant posts and after fulfillment of codal formalities; they were appointed on their respective posts by the competent authority in the office of Agency Surgeon North Waziristan and after fulfillment of codal formalities, they were performing their duties at their respective posts without having any complaints whatsoever; that the petitioners have served the respondents department for about seven years and are still performing duties but the respondents stopped the salaries of the petitioners since 2015 without giving any

ATTESTED:
 [Signature]
 Chairman, Baluchistan
 Baluchistan Council

cogent reasons, despite the fact that the nature of the posts of the petitioners are permanent nature; that the petitioners filed an appeal before the respondents for releasing their salaries but of no avail, hence the instant Writ Petition.

3. In pursuance of order of this court, comments were submitted by respondents No.1,2 & 3 wherein they have categorically stated that they have no objection on release of their salaries however, the petitioners were intimated to open their Bank Accounts for release of their salaries but up-till now they had not opened the said account and as per the guidelines and directives of the Government of Khyber Pakhtunkhwa without online Banking System the salaries of the employees will not disbursed.

4. Considering the arguments and perusing the record made available, it is observed that the petitioners were appointed in Health Department after observing all codal formalities in the Office of Agency Surgeon North Waziristan in 2013 and since their appointment, they are performing duties on their respective posts efficiently and they were being paid salaries upto March, 2015, however, abruptly, the respondents, without any reason stopped the onward salaries of petitioners. It is sad to note that while the spirit of the fundamental rights was to protect the property of

ATTESTED
Banned

every citizens of Pakistan and no one could be deprived from their due rights, the incompetence and ineptness of the respondents to withhold the salaries of petitioners resulted in its failure. In addition to above, the respondents in their comments raised the objection that as per direction issued by the Government regarding online banking system, the petitioners were intimated to open their bank accounts but they had not opened the same is not a valid ground for the reason that any employee performing any kind of duty is entitled to be treated in accordance with law and equity so that he gets his remuneration for the work done. Grant of salary is not bounty of the State but one of the basic fundamental rights.

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5. By now it has been settled that, if appointment order was made against established procedure, appointing authority would be responsible for committing irregular appointments and as the petitioners were performing their duties then their salary cannot be stopped only for the reason that they had not opened their bank account, as there exists no provision of stoppage of salary in service laws, hence, they are entitled for the same. If the employee is made to work without payment of salary it would be against the injunctions of Islam, which envisages payment of wages before sweat of toil is dried up. This act would also be

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ATTESTED
JUDGE
Peshawar High Court
Bannu Bench

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violative of the principles of policy contained in Chapter 2 part-II of the constitution and also Article 3 of the Constitution, which cast duty on the state to eliminate all forms of exploitation.

6. In view of above situation, illegality, malafide of respondents/ department is palpable on the record. The pay of petitioners cannot be stopped in presence of the appointment order, charge report, performance of duties, which facts have not denied by the respondents. In similar nature case titled "*Mujeebur Rehman and 24 others Vs Province of Sindh through Secretary Education, Education Department, Government of Sindh and 3 others*" (2012 PLC (C.S) 708, it was held:

"We could not understand as to how a person in service can be stopped salary on the ground that he has been unauthorizedly appointed and he is also allowed to work. As long as a person after appointment is working in the Department, his salary cannot be stopped. Law provides procedure for removal of a civil servant which the government should follow. We in the given circumstances, direct the respondents and the Finance

ATTESTED
Peshawar High Court
Jhang Bench

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department to release the salaries of the petitioners forthwith and they will continue to get their salaries as long as they are not removed from the Department in accordance with law. We may observe that such instruction of the finance department to withhold salaries of the petitioner, without their removal from service in accordance with law, is contrary to the Civil Servants law. We in future, if confronted with such an eventuality would take action against the finance department. Non-compliance of any of the directives of this Court will expose the concerned official to contempt proceedings. Compliance to be made within 15 days."

7. For the foregoing reasons and deriving guidance from the superior Courts, we accept this writ petition and declare impugned act of the respondents regarding stoppage of pay/salaries void ab initio and direct the respondents to release salary of petitioners forthwith from the date of stoppage of their pay/salaries. Besides, the petitioners are directed to open their bank Accounts forthwith.

Announced *Sd. Justice Ms. Musarrat Hilali, J*
Di. 26.02.2020 *Sd. Mr. Justice Sahibzada Asadullah, J*
Hasnain

CERTIFIED TO BE TRUE COPY

(D.B)
Hon'ble Ms. Justice Musarrat Hilali
Hon'ble Mr. Justice Sahibzada Asadullah

Prescribed by the Government of Punjab
Authenticity of the Court Seal is
in accordance with the provisions of the
Law of Evidence, 1974 (Act No. 19 of 1974)

16/04/2020

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BEFORE THE PESHAWAR HIGH COURT, BANNU BENCH

C.M No. _____ of 2020

In

WP No. 1308/2019

Nisar Ahmad & othersPetitioners
VERSUS
Govt of KPK & othersRespondents

APPLICATION FOR IMPLEADMENT OF
APPLICANTS BEING IMPORTANT AND
NECESSARY PARTY IN THE NOTED
WRIT PETITION IN THE PANEL OF
PETITIONERS.

Respectfully Sheweth:

The Applicants humbly submits as under:-

1. That the above mentioned case is pending adjudication before this Hon'ble Court which is fixed for 26.02.2020.
2. That the names of the Applicants which are necessary parties and are liable to be impleaded are as under:-
 - i. Nazir Ullah S/o Nawab Khan R/o District North Waziristan
 - ii. Ahmad Ali S/o Habib Khan R/o district North Waziristan.
 - iii. Nizam ud Din Qureshi S/o Noorza Khan Qureshi R/o District North Waziristan
 - iv. Siraj ud Din Qureshi S/o Noora Khan Qureshi R/o District North Waziristan
 - v. Zakir Ullah S/o Khan Nawaz R/o District North Waziristan
 - vi. Muhammad Yaseen S/o Afsar Khan r/o District North Waziristan
 - vii. Nasir Iqbal S/o Ayub Khan R/o District North Waziristan
 - viii. Wasih ur Rehman S/o Gul Zaman R/o District North Waziristan
 - ix. Mst Safia Naz D/o Minhaj ud Din R/o District North Waziristan

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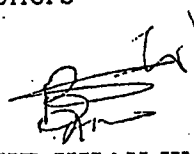
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3. That the Applicants are appointing in the Respondents Department on their respective posts and are performing their duties zeal and zest. (Copies of Appointment Letters are attached as annexure A)
4. That it is well settled and equitable principles of law for just and proper decision of the instant case, the necessary parties who have intentionally not been made party.
5. That if the Application for impleadment is not allowed the Applicants would suffer extreme irreparable loss.
6. That there is no bar in such like application and the necessary parties may be made party as in the panel of Petitioners.
7. That any other ground will be raised at the time of arguments with prior permission of this Hon'ble Court.

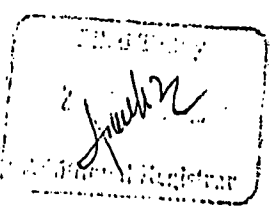
It is, therefore, most respectfully prayed that on acceptance of this application, the above noted parties may kindly be impleaded as important and necessary party in the panel of Petitioner for just and proper decision of the present cases.

Petitioners
Through



BASHIR KHAN WAZIR
Advocate, High Court
Peshawar

Date: 18.02.2020



OFFICE ORDER

In compliance of Honorable Peshawar High Court Bannu Bench Judgment No. WP No. 1308-B of 2019, and endorsement by the Director Health Services Merged Areas, Peshawar letter No. 8405/DHS-MA/s/Lit dated 20-04-2020. The salaries of following staff are hereby released from the date of stoppage of their salaries in the best interest of Justice.

S#	Name	Designation with BPS
1	Mr. Najeebullah	Junior EPI Technician BPS-12
2	Mr. Nasirud Din	Junior EPI Technician BPS-12
3	Mr. Saif U Din	Junior EPI Technician BPS-12
4	Mr. Nisar Ahmad	JCT (Pharmacy) BPS-12
5	Mr. Zia Ud Din	Laboratory Assistant BPS-12
6	Mr. Islamullah	Junior EPI Technician BPS-12
7	Mr. Mujahid Shah	JCT (Pharmacy) BPS-12
8	Mr. Noor Shahid Din	Junior EPI Technician BPS-12
9	Mr. Gul Nasib	Junior EPI Technician BPS-12
10	Mr. Salimullah	JCT (Pharmacy) BPS-12
11	Mr. Muhammad Firdous	JCT (Pharmacy) BPS-12
12	Miss. Nooreen Naz	LHV
13	Mst. Bushra Nooreen	LHV
14	Mr. Salimullah	JCT (Pharmacy) BPS-12
15	Mst. Khalida Zia	LHV
16	Mst. Wasima Tahir	LHV
17	Mst. Hafsa	LHV
18	Mr. Rashidullah	JCT (Pharmacy) BPS-12
19	Ameerullah	JCT (Pharmacy) BPS-12
20	Muhammad Idress	JCT (Pharmacy) BPS-12
21	Nazirullah	Malaria Supervisor
22	Safiullah Khan	JCT (Pharmacy) BPS
23	Barkatullah Khan	JCT (Pharmacy) BPS
24	Mehboob Alam	JCT (Pharmacy) BPS

NB: Necessary entry may be made in their service book for record.

Sd/xxx

District Health Officer

North Waziristan Tribal District

No. 2306-9 / Adjustment/release Dated Miranshah the 5/5 2020.

Copy forwarded for information and further necessary action to the:

1. District Account Officer NWTD with the request to release the salaries of the above officials from the date of stoppage of their salaries in the best interest of Justice.
2. Director General Health Services KPK.
3. Director Health Services Merged Areas Peshawar w/r caption letter above please.
4. Register Peshawar High Court Bannu Bench for information please.

District Health Officer
North Waziristan Tribal District

**SUBJECT : TO THE DIRECTOR GENERAL HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR, DEPARTMENTAL APPEAL FOR REALEASE OF
SALARIES STOPPED/WITHHELD BY THE DISTRICT HEALTH OFFICER NORTH
WAZIRISTAN, SINCE 1ST JUNE,2021 ILLEGALLY UNLAWFULLY ANY PLAUSABLE
REASON.**

RESPECTED SIR,

The Appellant submit as under:

With due respect it is stated that am performing my duties as junior clinical Technician BPS_12 under the control of district health officer North Waziristan.

That since my appointment I am performing my duties with great zeal and zest without giving any opportunity of being complaint to my high up, but in meanwhile in 2015, my salaries was stopped /withheld on the reason that the computerization of manual system has to be connected, due to which my salaries were stopped/ withhold and thereafter I submitted a number of application to the competent authority for release of my salaries but in when and lastly into 2019 I along with other aggrieved employees have been filed a writ Petition No-7299/2019 before the August, High court Peshawar for release of salaries in which interim relief was granted in our'sfavour and the case was sent to Peshawar High court, Bannu bench whereby the comments were submitted by the respondent and the Writ petition number was changed as Writ petition No 1308-B/2019.

That the case was fixed for final arguments and in the light of arguments delivered by our counsel and the case allowed resultantly the high ups of the health department was directed to release our salaries since, it has been stopped.

That after the announcement of the Judgment the salaries of the appellant was released , and till 1ST June of 2021 I was receiving the monthly salary, in the meanwhile when the month of June was expired and I have got the knowledge that my salary has been stopped without any cogent reason and requested to the competent the than DHO, and submitted the judgment and implementation order but in which has the instant appeal.

It is therefore humbly prayed that an acceptance of this appeal and the salaries of the appellant may kindly be ordered to be released with the effect from stoppage.

I shall be very thankful to you.

Appellant

Name: Safi Ullah

Designation: JCT_BPS 12

Contact: _____

OFFICE OF THE DISTRICT HEALTH OFFICER
TRIBAL DISTRICT AT MIRANSHAH

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

Email: agency surgeon nwa2018@gmail.com

No. 13024 /DHO NWTD

Dated

06 / 08 / 2021

To

The Director General Health Services
KP, Peshawar

Subject:

REQUEST FOR INQUIRY AGAINST DHO NORTH WAZIRISTAN

R/Sir,

In compliance to your office endorsement No.7047-50/E.I dated 06/05/2021 in response to Secretary Health Office Letter No. SOH (E-V) 4/20201/Inquiry Report dated Peshawar the April 22nd, 2021, the undersigned is pleased to cancel/withdraw all the irregular adjustment/regularization and appointment of the employees during the tenure of Dr. Hamid Ullah and Dr. Iqbal Ul Haq EX-DHO North Waziristan as indicated in the inquiry report with immediate effect.


District Health Officer
Tribal District Miranshah

Dated the:

08/2021

No. _____ /DHO NWTD

Copy forwarded to the:

1. Deputy Commissioner Tribal District Miranshah.
2. PA to Secretary Health KP, Peshawar.
3. HQ-7 Dive Camp Area Miranshah.
4. All Officials Concerned.


District Health Officer
Tribal District Miranshah

Shipper's Copy I warrant that I have read the terms and conditions on the reverse of this shipping label and agree to be bound by them. I warrant that the contents are as described and that the goods are in good condition. I warrant that the goods are not hazardous, flammable, explosive, or otherwise dangerous. I warrant that the goods are not prohibited or restricted by law. I warrant that the goods are not counterfeit or infringing on any trademark or copyright. I warrant that the goods are not stolen or subject to any legal claim. I warrant that the goods are not obscene, indecent, or otherwise offensive. I warrant that the goods are not illegal or prohibited by law. I warrant that the goods are not restricted by law. I warrant that the goods are not subject to any export control. I warrant that the goods are not subject to any trade embargo. I warrant that the goods are not subject to any trade restriction. I warrant that the goods are not subject to any trade barrier. I warrant that the goods are not subject to any trade duty. I warrant that the goods are not subject to any trade tax. I warrant that the goods are not subject to any trade fee. I warrant that the goods are not subject to any trade charge. I warrant that the goods are not subject to any trade cost. I warrant that the goods are not subject to any trade expense. I warrant that the goods are not subject to any trade loss. I warrant that the goods are not subject to any trade damage. I warrant that the goods are not subject to any trade risk. I warrant that the goods are not subject to any trade liability. I warrant that the goods are not subject to any trade responsibility. I warrant that the goods are not subject to any trade obligation. I warrant that the goods are not subject to any trade duty. I warrant that the goods are not subject to any trade tax. I warrant that the goods are not subject to any trade fee. I warrant that the goods are not subject to any trade charge. I warrant that the goods are not subject to any trade cost. I warrant that the goods are not subject to any trade expense. I warrant that the goods are not subject to any trade loss. I warrant that the goods are not subject to any trade damage. I warrant that the goods are not subject to any trade risk. I warrant that the goods are not subject to any trade liability. I warrant that the goods are not subject to any trade responsibility. I warrant that the goods are not subject to any trade obligation.	
Account/Coupon Consignment Note No. 470 9758927 Sales Tax Invoice DTG: 350	From (Shipper) LTD Union Office Phone: 470 9758927 To (Consignee) Soft Culture See packaging
Mode of Payment <input type="checkbox"/> Cash <input type="checkbox"/> A/C <input type="checkbox"/> D/D <input type="checkbox"/> Other Insured <input type="checkbox"/> Yes <input type="checkbox"/> No Value Lbs: 0.5 Wt: 1 Hgt: 1	Call 111-123-456 GST NO. 12-00-5802-002-73 <input type="checkbox"/> Account Debit
Service Type <input type="checkbox"/> Overnight <input type="checkbox"/> Holiday <input type="checkbox"/> Extra Sp. <input type="checkbox"/> Same Day <input type="checkbox"/> Second Day Services Charges Weight Handling Other GST Invoice No. 350	PICKUP INFORMATION Date: 11/10/11 Time: 11:00 Description: D.G. Head Country Code: 111 Day: 11/10/11

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بعدالت سند و سبب سے پیروی کے لئے

B.C 09.2053
MOB - 0333-9732415

2022ء منجانب

بنام خلوص
رضع اللہ

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ~~لینڈ انڈیا~~ کیلئے ~~لینڈ لینڈ~~ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک رو پیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائنا التوائے مقدمہ کے سبب سے وہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی

مذکورہ کریں۔ لہذا وکالت نامہ لکھدیا کہ سند ہے۔ ~~Attested & accepted~~

المرقوم 28 ماہ 10 2022

العبد _____ واہ العبد

بمقام
رضع اللہ
کے لئے منظور ہے۔