

ORDER

18.10.2022

Mr. Bakhtiar Muhammad Advocate, for the appellant present.

Muhammad Adeel Butt, learned Additional Advocate General

for respondents present

At the very outset, learned counsel for appellant requested for withdrawal of the instant service appeal. In this regard, he submitted an application which is placed on file.

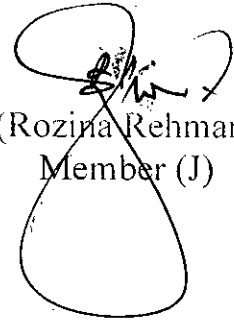
Keeping in view the request coupled with application, appeal in hand stands dismissed as withdrawn. No order as to costs. File be consigned to the record room.

ANNOUNCED

18.10.2022




(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

14.08.22

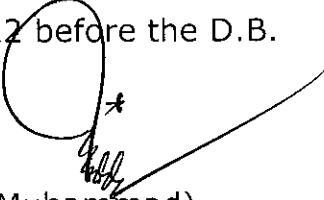
Due to summer vacations the case is
adjourned to 15/09/22 for the same.



Reader

15.09.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.


Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 18.10.2022 before the D.B.


(Mian Muhammad)
Member (Executive)


(Salah-Ud-Din)
Member (Judicial)

21.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.


Reader.

25th May, 2022

Junior of learned counsel for the appellants present.
Mr. Muhammad Rashid, DDA alongwith Safiullah, Litigation Officer for respondents present.

Junior of learned counsel for the appellant seeks adjournment on the ground that learned senior counsel is not available today. Adjourned. To come up for arguments on 14.06.2022 before D.B.

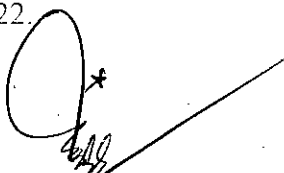

(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

14.06.2022

Clerk of counsel for the appellants present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned. To come up for arguments before the D.B on 17.08.2022.

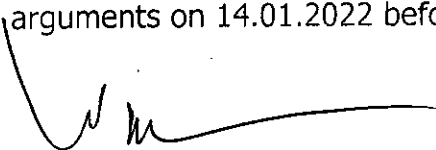

(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

03.01.2022

Counsel for the appellant and Mr. Asif Masood Ali Shah, DDA alongwith Safiullah, Litigation Officer for the respondents present.

Counsel for the appellant seeks adjournment for preparation. Request accorded. Case to come up for arguments on 14.01.2022 before the D.B.

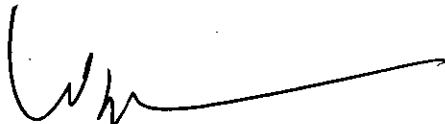

(Atiq-ur-Rehman Wazir)
Member(E)


Chairman

14.01.2022

Mr. Javed Iqbal Gulbela, Advocate present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Learned counsel for the appellant requested for time for documentation of the appeal with certain additional documents. Request accorded. To come up for arguments before the D.B on 21.02.2022.


(Atiq-Ur-Rehman Wazir)
Member (E)

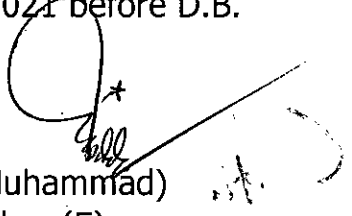

Chairman


11.11.2021

Junior to counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Safi Ullah S.O for respondents present.

Reply on behalf of respondents was not submitted. Respondents made a request for time to submit reply/comments; granted by way of last chance with direction to submit reply/comments positively within 10 days. If the reply/comments are not submitted within stipulated time, right of respondents for submission of reply shall be deemed as struck off. To come up for arguments on 08.12.2021 before D.B.

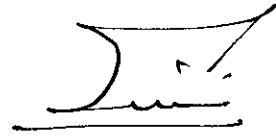

(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

08.12.2021

Learned counsel for the appellant present. Mr. Safiullah, Section Officer alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

The Worthy Chairman is on leave, therefore, the bench is incomplete. Adjourned. To come up for arguments on 03.01.2022 before the D.B.


(Salah-ud-Din)
Member (J)

21.09.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

This appeal was admitted on the strength of the order of admission in appeal No. 6688/2021 which according to learned counsel for the appellant is fixed for 30.09.2021. This appeal be also fixed/clubbed with appeal No. 6688/2021. Reply/comments have not been submitted by the respondents. Let them file the reply/comments on or before the next date, failing which their right for submission of reply/comments shall be deemed as struck off. Case to come up for arguments on 30.09.2021 before the available D.B.



(Rozina Rehman)
Member(Judicial)



Chairman

30-9-21

Due to non Availability
of DB therefore case is
adjourned to come for
the same on 11-11-2021



Respondents

03.08.2021

Counsel for the appellant present. Preliminary arguments heard.

Contends that in view of the order of this Tribunal annexed with this appeal at Page 25 (Annexure-E), an appeal against the same order as impugned in this appeal, has been admitted for full hearing with grant of ad-interim relief. The contention of learned counsel is well placed. The appeal at hand is also admitted for full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.09.2021 before the D.B.

An application has been filed alongwith the appeal for interim relief. Notice of the application be also given to the respondents. The operation of the impugned order shall remain suspended to the extent of appellant till date fixed.


Chairman

Appellant Deposited
Security & Process Fee



03/8/21

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7087 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/07/2021	<p>The appeal of Dr. Shabana Fida resubmitted today by Mr. Bakhtiar Muhammad 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 for preliminary hearing to be put up there on <u>03/08/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: Dr. Shabana Fida vs Govt of KPK & others

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>Bakhtyar Mohamad Adv</u>		
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?		✓
17	Whether list of books has been provided at the end of the appeal?		✓
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		✓
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____		✓
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		✓

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Bakhtyar Mohamad

Signature: [Signature]

Dated: 28/07/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

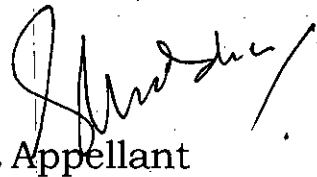
Dr. Shabana Fida. **APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa etc. **RESPONDENTS**

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal with Affidavit		1-7
2.	Application for Suspension with Affidavit		8-10
3.	Addresses of the Parties		11
4.	Copy of Impugned Order dated 01.06.2021	A	12-14
5.	Copy of Departmental Appeal	B	15-16
6.	Copy of Transfer & Posting Policy	C	17-22
7.	Copy of the Experience/ Service Certificate	D	23-24
8.	Copy of Order dated 02.07.2021	E	25-27
9.	Wakalatnama		28


Appellant

Through


Bakhtiar Muhammad

Advocate High Court(s)

Dated: 28.07.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 7087/2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7375

Dated 28/7/2021

Dr. Shabana Fida W/o Anwar Khan
Woman Medical Officer, Civil Dispensary,
Umeed Abad No.2, Swati Gate, Peshawar.**APPELLANT**

VERSUS

1. Govt. of Khyber Pakhtunkhwa,
through Secretary Health,
at Civil Secretariat, Peshawar.
2. Director General Health Services,
Govt. of Khyber Pakhtunkhwa,
Peshawar.**RESPONDENTS**

SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT,
1974 AGAINST THE IMPUGNED TRANSFER
ORDER NO.SOH(E-II)1-1/2021, DATED
01.06.2021 OF THE OFFICE OF
SECRETARY HEALTH, KHYBER
PAKHTUNKHWA, WHEREBY THE
APPELLANT HAS BEEN TRANSFERRED
FROM DISTRICT PESHAWAR TO DISTRICT
KARAK IN UTTER VIOLATION OF THE LAW
AND POLICY OF TRANSFER AND POSTING,
GOVERNING THE SUBJECT.

Filed to-day

u.
Registrar
28/7/2021

Respectfully Sheweth:

1. That the appellant is a naturally born bonafide citizen of Islamic Republic of Pakistan and hails from a respectable family of District Peshawar.
2. That after going through the mandatorily required criteria, laid down for selection of Medical Officers, the appellant got appointed as Medical Officer years back.
3. That since induction into service and getting onto the rolls of this extremely humane and prestigious Department, the appellant has remained the most pragmatic, devoted and dutiful fellow, who never left any stone unturned in performance of her duties and importing any responsibility that has been entrusted to the appellant.
4. That being highly professional and pragmatic towards the responsibilities bestowed upon the shoulders of the appellant and because of her whetted professional skills, there have never been any sort of soot or sootage upon her long career, which fact is reflected from appellant's service record, which sans any complaint or adverse or even advisory remarks mentioned or ever communicated to the appellant.

5. That inspite of all this background, whereby a brief glimpse is given in the preceding paras, the appellant has been transferred vide the impugned office order No.SOH(E-II)1-1/2021, dated 01.06.2021, issued from the Office of Secretary Health, Khyber Pakhtunkhwa, like a bolt from the blue, from District Peshawar to District Karak and has been placed at the disposal of District Health Officer Karak in quite illegal and unwarranted manner. **(COPY OF IMPUGNED ORDER DATED 01.06.2021 IS ANNEXED HEREWITH AS ANNEXURE "A")**.
6. That feeling aggrieved, the appellant preferred a Departmental Appeal but inspite of lapse of stipulated period as postulated in Khyber Pakhtunkhwa Transfer and Posting Policy, nothing came up of the same. **(COPY OF DEPARTMENTAL APPEAL IS ANNEXED HEREWITH AS ANNEXURE "B")**.
7. That before going to jotted down to the grounds of the instant Service Appeal, it would be appropriate to mention here that the Provincial Government has provided for its own Transfer and Posting Policy as visualized as Khyber Pakhtunkhwa Transfer & Posting Policy, wherein, it has provided for all sorts of conditions for posting and transfer of any Civil

Servant, whereas, the same policy has also provided for approaching this Hon'ble Tribunal quite expeditiously. **(COPY OF TRANSFER & POSTING POLICY IS ANNEXED HEREWITH AS ANNEXURE "C")**.

8. That feeling aggrieved and having the only remedy available, being Civil Servant, the appellant approaches this Hon'ble Tribunal for setting aside the impugned transfer order dated 01.06.2021, issued from the Office of Secretary Health, Khyber Pakhtunkhwa, upon the following grounds, inter alia;

GROUND S:

- A. That the impugned transfer and posting order is wrong, illegal, unwarranted, hence not tenable in the eyes of law.
- B. That the impugned transfer and posting order is thoroughly in derogation to the principles as laid down and enumerated in the transfer and posting policy.
- C. That the impugned transfer order is also against the normal tenure policy, which under the law is not allowed.

- D. That by transferring the post of the appellant, the appellant has virtually been penalized for no wrong done and has been simply kicked out from District Peshawar as in either case, the appellant can easily be adjusted anywhere in District Peshawar, where dozens of posts are laying vacant.
- E. That even the spouse policy fully covers the case of the appellant as the husband of the appellant has been working as Medical Officer in Fauji Foundation Hospital, Peshawar since 29th June, 2001 till date, under District Health Officer, Peshawar, and transferring the appellant to District Karak is a sheer violation of the policy and rules governing therein. Furthermore, the appellant has five children including minors and in case of transfer, the whole family will be disturbed and will be impossible for appellant to leave her family. **(COPY OF EXPERIENCE/ SERVICE CERTIFICATE IS ANNEXED AS ANNEXURE "D")**.
- F. That from every angle, the impugned transfer and posting order is wrong, illegal, unlawful and is liable to be set aside.
- G. That it is pertinent to mention here that a similar nature appeal bearing No.6686/2021 alongwith 11 other connected appeals against the same transfer

order is pending adjudication before this Hon'ble Tribunal, wherein this Hon'ble Tribunal has been pleased to grant stay in favour of the appellant, vide order dated 02.07.2021. **(COPY OF ORDER IS ANNEXED HEREWITH AS ANNEXURE "E")**.

H. That any other ground not raised here may graciously be allowed at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant Service Appeal, the impugned transfer and posting order No.SOH(E-II)/1-1/2021, dated 01.06.2021 of the Office of Secretary Health, Khyber Pakhtunkhwa, may very graciously be set aside.

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

Through

Appellant

Bakhtiar Muhammad
Advocate High Court(s)

Dated: 28.07.2021

NOTE:

That Service Appeal No.6686/2021 alongwith 11 other connected appeals is pending before this Hon'ble Tribunal, therefore, being similar nature, the instant appeal may please be clubbed with the same.

ADVOCATE

7

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

In S.A. No. _____/2021

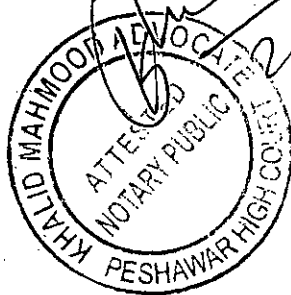
Dr. Shabana Fida W.M.O (BPS-17)

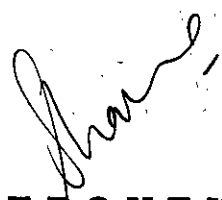
VERSUS

Secretary Health Khyber Pakhtunkhwa & Others

AFFIDAVIT

I, **Dr. Shabana Fida** W.M.O (BPS-17) do hereby solemnly affirm and declare on oath that all the contents of the accompanying **Service Appeal/ Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT
CNIC: 17301-8105754-0
Cell No. 0333-9268707

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____/2021.

In

S.A No. _____/2021

Dr. Shabana Fida. **APPLICANT/APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa etc. **RESPONDENTS**

APPLICATION FOR SUSPENSION OF
OPERATION OF THE IMPUGNED
TRANSFER AND POSTING ORDER
DATED 01.06.2021 TO THE EXTENT
OF APPLICANT AND RELEASE OF
SALARY.

Respectfully Sheweth:

1. That the applicant/appellant is filing the instant application, the contents of which may very graciously be considered as integral part and parcel of the titled appeal.
2. That balance of convenience lies in favour of the applicant/appellant.

3. That if operation of the impugned transfer and posting order is not suspended, the applicant/appellant will suffer irreparable loss.
4. That the respondents' department has illegally stopped the salaries of the applicant/appellant which is against the law and rules and the applicant/appellant faces great hardships.
5. That in given circumstances of the case, suspension of operation of the impugned transfer and posting order dated 01.06.2021 is indispensable.

It is, therefore, most humbly prayed that on acceptance of the instant application, the operation of the impugned transfer and posting order dated 01.06.2021 may very graciously be suspended, till the final disposal of the titled Service Appeal.

Through


Applicant/ Appellant


Bakhtiar Muhammad
Advocate High Court(s)

Dated: 28.07.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____/2021

In

S.A No. _____/2021

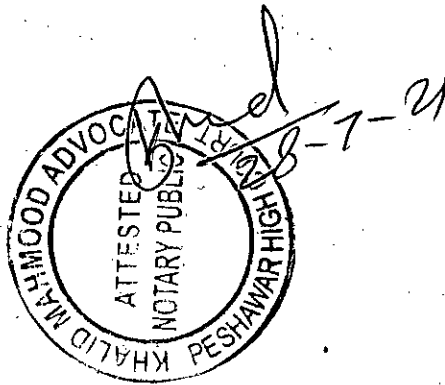
Dr. Shabana Fida. **APPLICANT/APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa etc. **RESPONDENTS**

AFFIDAVIT

I, Dr. Shabana Fida W/o Anwar Khan, Woman Medical Officer, Civil Dispensary, Umeed Abad No.2, Swati Gate, Peshawar, 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 Tribunal.



Shabana Fida
DEPONENT

CNIC 17701-8105754-0

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Dr. Shabana Fida. **APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa etc. **RESPONDENTS**

ADDRESSES OF THE PARTIES

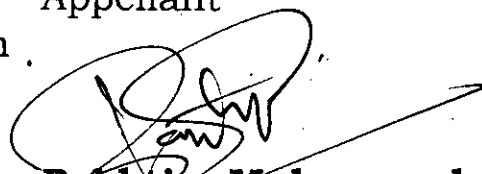
APPELLANT:

Dr. Shabana Fida W/o Anwar Khan
 Woman Medical Officer, Civil Dispensary,
 Umeed Abad No.2, Swati Gate, Peshawar.

RESPONDENTS:

1. Govt. of Khyber Pakhtunkhwa,
 through Secretary Health,
 at Civil Secretariat, Peshawar.
2. Director General Health Services,
 Govt. of Khyber Pakhtunkhwa,
 Peshawar.

Appellant
 Through


Bakhtiar Muhammad
 Advocate High Court(s)

Dated: 28.07.2021



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated: 1st June, 2021

(12)

Am-A-2

NOTIFICATION

No. SOH (E-II)/1-1/2021/ Upon the abolition of the posts of Medical Officers/Women Medical Officers (JPS-17) in different Civil Dispensaries in District Peshawar, the following posting/transfer is hereby ordered with immediate effect in best public interest:

S#	Name of Doctor	From	To	Remarks
1	Dr. Muhammad Ali	Civil Dispensary Khalid Town, Peshawar.	Placed at the disposal of DHO Hangu	Against vacant post
2	Dr. Hamayun Murtaza	Civil Dispensary SMT-I	Placed at the disposal of DHO Hangu	Against vacant post
3	Dr. Bushra Ayub	Civil Dispensary SMT-I	DHO Hospital Hangu	Against vacant post
4	Dr. Naseela Rehman	CD Shana Mari	DHO Hospital Hangu	Against vacant post
5	Dr. Faqir Mahmood Khattak	CD Din Bahar Colony, Peshawar	DHO Hospital Karak	Against vacant post
6	Dr. Muhammad Asif	CD Rashid Gan	Placed at the disposal of DHO Karak	Against vacant post
7	Dr. Aleeqa Rehman	CD Latif Abad, Peshawar	DHO Hospital Hangu	Against vacant post
8	Dr. Zahid Imran	BHU High Court	Placed at the disposal of DHO Hangu	Against vacant post
9	Dr. Noor-e-Mubeen	CBD No. 2, Peshawar	DHO Hospital Karak	Against vacant post
10	Dr. Faqir Manzoor	CBD No. 03, Peshawar	Placed at the disposal of DGHS, Peshawar	Against vacant post
11	Dr. Syed Usman Shah	CD Sheikh Abad, Peshawar	Placed at the disposal of DHO Karak	Against vacant post
12	Dr. Arshad Raza Ullah	CD Wasir Bagh, Peshawar	Placed at the disposal of DHO Karak	Against vacant post
13	Dr. Saadqat Hossain	CD Sheikh Abad at Cat-RHC Takhtabad on GD	Placed at the disposal of DHO Chitral Upper	Against vacant post
14	Dr. Shabana Fida	CD Swati Gate	Placed at the disposal of DHO Karak	Against vacant post
15	Dr. Nojha Ailuddin	CD Gulbahar	DHO Hospital Hangu	Against vacant post
16	Dr. Nazam Muzahir	CD Zangabad	Placed at the disposal of DHO Chitral Upper	Against vacant post
17	Dr. Ibrahim Rehman	CBD No 3 at Cat-D Garhajik	Placed at the disposal of DHO Chitral Upper	Against vacant post
18	Dr. Ambreen Muhammad	CBD No 1 on GD at RUC Regi	Placed at the disposal of DHO Chitral Upper	Against vacant post
19	Dr. Farhat Ehsan	CD Sheikh Abad	DHO Hospital Karak	Against vacant post
20	Dr. Babar Zoha	CD Bama Ehsan	Placed at the disposal of DHO Chitral Upper	Against vacant post
21	Dr. Faraz Begum	CD Gulbahar	DHO Hospital Hangu	Against vacant post

SECRETARY HEALTH
KHYBER PAKHTUNKHWA

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

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ATTESTED

12 (A)

BETTER COPY:

GOVERNMENT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

DATED: 01 JUNE, 2021

NOTIFICATION

No. SOH (E-II)/1-1/2021/:

Upon the abolition of the post of medical officer/ women medical officer (BPS 17) in different civil dispensaries in district Peshawar. The following posting / transfer is here by order with immediate effect embossed public interest.

S.No	Name of Doctors	Present place of posting/Tenure	Propose	Remarks
1	Dr. Muhammad Ali MO (BPS-17) Domicile Khyber	Civil Dispensary Khalid Town Peshawar since 07.01.2006	At the disposal of DHO, Hangu	Against the vacant post
2	Dr. Hamayun Murtaza MO (BPS-17)	Civil Dispensary SMT-I since 19.01.2012	At the disposal of DHO, Hangu	Against the vacant post
3	Dr. Bushra Ayub WMO (BPS-17)- Domicile: Lakki Marwat	Civil Dispensary SMT-I since 18.09.2014	DHQ Hospital Hangu	Against the vacant post
4	Dr. Nabeela Rehman WMO (BPS-17) Domicile:	CD Bhana Mari since 12.08.2016	DHQ Hospital Hangu	Against the vacant post
5	Dr. Faiza Mehmood KHattak WMO (BPS-17) Domicile: Peshawar	CD Din Bahar Colony Peshawar 11.08.2016	DHQ Hospital Karak	Against the vacant post
6	Dr. Muahmmad Asif MO (BPS-17) Domicile: Peshawar	CD Rashid Gari (from Badaber) since 26.07.2016	At the disposal of DHO, Karak	Against the vacant post
7	Dr. Ateeqa Rehman WMO (BPS-17) Domicile: Peshawar	CD Latif Abad Peshawar since 12.08.2016	DHQ Hospital Hangu	Against the vacant post
8	Dr. Zahid Imran MO (BPS-17) Domicile: Swabi	BHU High Court since 12.08.2016	At the disposal of DHO, Hangu	Against the vacant post
9	Dr. Noor e Mobeen MO (BPS-17) Domicile:	CBD-No.2 Peshawar since 09.07.2016	DHQ Hospital Karak	Against the vacant post
10	Dr. Faiqa Manzoor MO(BPS-17) Domicile: Peshawar	CBD No. 03 Peshawar since 25.08.2016	At the disposal of DGHS, KP Peshawar	Against the vacant post
11	Dr. Syed Usman Shah MO (BPS-17) Domicile: Peshawar	CD Sheikhabad Peshawar since 07.09.2016	At the disposal of DHO, Karak	Against the vacant post
12	Dr. Arshad Rahat Ullah MO (BPS-17) Domicile: Peshawar	CD Wazir Bagh Peshawar since 08.09.2016	At the disposal of DHO, Karak	Against the vacant post
13	Dr. Sadaqat Hussain MO (BPS-17) Domicile: Peshawar	CD Sheikhabad at Cat-RHC Takhtabad on GD since 19.05.2016	At the disposal of DHO, Chitral Upper	Against the vacant post
14	Dr. Shabana Fida WMO (BPS-17) Domicile: Moamand	CD Swati Gate (from Badaber since 11.06.2016	At the disposal of DHO, Karak	Against the vacant post
15	Dr. Wajiha Alluddin WMO (BPS-17) Domicile: Peshawar	CD Gulbahar since 09.08.2017	DHQ Hospital Hangu	Against the vacant post
16	Dr. Azeem Muzahir MO (BPS-17) Domicile: Peshawar	CD Zargarabad since 01.08.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
17	Dr. Ikram-ur-Rehman MO (BPS-17) Domicile: Peshawar	CBD No.3 at Caaat-D Garatajik since 22.08.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
18	Dr. Ambreen Muhammad WMO (BPS 17)	CBD No.1 on GD at RHC Regi since 12.10.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
19	Dr. Saima Tahir WMO (BPS-17) Domicile: Mardan	CD Sheikhabad since 16.10.2017	DHQ Hospital Karak	Against the vacant post
20	Dr. Maria Afaq WMO (BPS-17)	CD Bhana Mari since 12.12.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
21	Dr. Ranaz Begum WMO (BPS-17) Domicile: Mohmand	CD Gulbahar since 18.01.2018	DHQ Hospital Hangu	Against the vacant post

SECRETARY HEALTH KHYBER PAKHTUNKHWA

13



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name. E-Mail Address: K.P.Kdghs@pshawa.com
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

NO 5163

/E-1

Dated: 31 / 05 / 2021

To

The Secretary to Government of
Khyber Pakhtunkhwa Health Department,
Peshawar.

Subject:- POSTING/TRANSFER.

As decided by the Government, posts of Medical Officers (BPS-17) in different Civil Dispensaries in District Peshawar are abolished, the following Medical Officer/Women Medical officers working in the said Dispensaries in District Peshawar are proposed for posting/transfer against the vacant post of MOWMO (BPS-17) in the public interest.


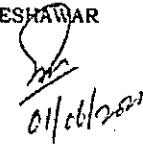
S.No	Name of doctors	Present place of posting/Tenure	Propose	Remarks
1.	Dr. Muhammad Ali MO (BPS-17) Domicile Khyber	Civil Dispensary Khalid Town Peshawar since 07.01.2006	At the disposal of DHO, Hangu	Against the vacant post
2.	Dr. Hamayun Murataza MO (BPS-17)	Civil Dispensary SMT-I since 19.01.2012	At the disposal of DHO, Hangu	Against the vacant post
3.	Dr. Bushra Ayub WMO (BPS-17) -Domicile: Lakki Marwat	Civil Dispensary SMT-I since 18.09.2014	DHQ Hospital Hangu	Against the vacant post
4.	Dr. Nabeela Rehman WMO (BPS-17) Domicile:	CD Bhana Mari since 12.08.2016	DHQ Hospital Hangu	Against the vacant post
5.	Dr. Faiza Mehmood Khattak WMO (BPS-17) Domicile: Peshawar	CD Din Bahar Colony Peshawar since 11.08.2016	DHQ Hospital Karak	Against the vacant post
6.	Dr. Muhammad Asif MO (BPS-17) Domicile: Peshawar	CD Rashid Gari (from Badaber) since 26.07.2016	At the disposal of DHO, Karak	Against the vacant post
7.	Dr. Ateeqa Rehman WMO (BPS-17) Domicile: Peshawar	CD Latif Abad Peshawar since 12.08.2016	DHQ Hospital Hangu	Against the vacant post
8.	Dr. Zahid Imran MO (BPS-17) Domicile: Swabi	BHU High Court since 12.08.2016	At the disposal of DHO, Hangu	Against the vacant post
9.	Dr. Noor e Mobeen MO (BPS-17) Domicile:	CBD-No.2 Peshawar since 09.07.2016	DHQ Hospital Karak	Against the vacant post
10.	Dr. Faiqa Manzoor MO (BPS-17) Domicile: Peshawar	CBD No. 03 Peshawar since 25.08.2016	At the disposal of DGHS, KP Peshawar	Against the vacant post
11.	Dr. Syed Usman Shah MO (BPS-17) Domicile: Peshawar	CD Sheikhabad Peshawar since 07.09.2016	At the disposal of DHO, Karak	Against the vacant post


ATTESTED

14

2.	Dr. Arshad Rahat Ullah MO (BPS-17) Domicile: Peshawar	CD Wazir Bagh Peshawar since 08.09.2016	At the disposal of DHO, Karak	Against the vacant post
13.	Dr. Sadaqat Hussain MO (BPS-17) Domicile: Peshawar	CD Sheikhabad at Cat-RHC Takhtabad on GD since 19.05.2016	At the disposal of DHO, Chitral Upper	Against the vacant post
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15.	Dr. Wajiha Alluddin WMO (BPS-17) Domicile: Peshawar	CD Gulbahar since 09.08.2017	DHQ Hospital Hangu	Against the vacant post
16.	Dr. Azeem Muzahir MO (BPS-17) Domicile: Peshawar	CD Zargarabad since 01.08.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
17.	Dr. Ikram-ur-Rehman MO (BPS-17) Domicile: Peshawar	CBD NO.3 at Cat-D Garatajik since 22.08.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
18.	Dr. Ambreen Muhammad WMO (BPS-17)	CBD No.1 on GD at RHC Regi since 12.10.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
19.	Dr. Saima Tahir WMO (BPS-17) Domicile: Mardan	CD Sheikhabad since 16.10.2017	DHQ Hospital Karak	Against the vacant post
20.	Dr. Maria Afaq WMO (BPS-17)	CD Bhana Mari since 12.12.2017	At the disposal of DHO, Chitral Upper	Against the vacant post
21.	Dr. Ranaz Begum WMO (BPS-17) Domicile: Mohmand	CD Gulbahar since 18.01.2018	DHQ Hospital Hangu	Against the vacant post

It is therefore requested that necessary orders of the Govt. may please be conveyed in the matter.


DIRECTOR GENERAL HEALTH
SERVICES KHYER PAKHTUNKHWA PESHAWAR

01/06/2018

UJAN KHAN
04/11/2017


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To

The Health Secretary
Khyber PAKHTUNKHWA

Sub: Appeal / Application For Cancellation of TRANSFER

Respected Sir

I am working as a woman medical officer at civil dispensary Unseed Abad 2 Swatigate PESHAWAR and I am appealing to kindly cancell my transfer due to following grounds

Grounds

- ① I am working since long as WMO and not as a surplus seat and whereas the order was made for Extra seats
- ② My Husband is working as medical officer in district Peshawar at Fauji Foundation Hospital Peshawar which comes under the spouse Policy.
- ③ My mother is in a state of cardiac and renal failure and under treatment and also I have to take care of my Family consisting of ~~Five~~ ^{Four} kids including minors as well.
- ④ I am working at Unseedabad civil dispensary which is a thickly populated

ATTESTED

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place and if my seat is vacated
then who will examine patients there.

Due to these Aforesaid reasons kindly
Reverse my Transfer order and recall
my transfer in the best public
interest and sufferings.

dated 13/06/2021 Dr SHABANA Fide

Shabana

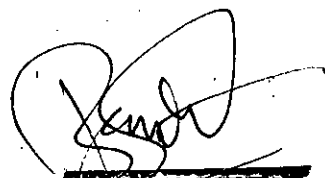
Shabana
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Annexure - "C"

JAVED IQBAL-Gul Bala
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-940500

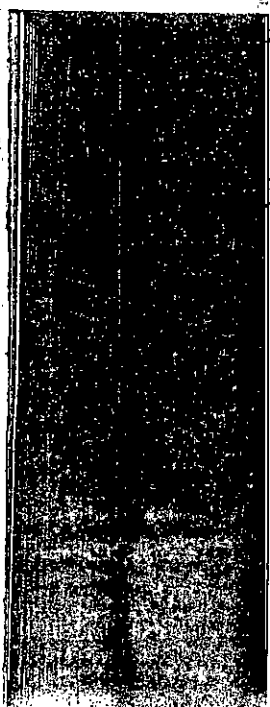

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(Regulation Wing)

2 POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.

1 . Instructions issued vide circular letter No. SOR-VI (E&AD)1-10/08 (X), dated 07-10-2008
 2 . Posting - Transfer Policy - updated till 10 Jan, 2009




(18)

- v) { } (16)
- vi) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, KHYBER PAKHTUNKHWA needs to be obtained
- ²While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary KHYBER PAKHTUNKHWA needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor KHYBER PAKHTUNKHWA shall be obtained.
- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officer's/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.
- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement
³DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- xii) In terms of Rule-17(1) and (2) read with Schedule-III of the KHYBER PAKHTUNKHWA Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column2 thereof;

- 1 Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the KHYBER PAKHTUNKHWA Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules.
- 2 Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004
- 3 Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

JAVED IQBAL Gul Bela
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob: 0345-9405501


ATTESTED

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- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.
- xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.
- Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
 - Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the Khyber Pakhtunkhwa District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

.....

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.
 {**Authority:** *Latter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003*}.

.....

Attended

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JAVED IQBAL, Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501


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Khyber Pakhtunkhwa Services Laws

1333

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment)

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.

- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.
- xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.
- Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.
 - Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the Khyber Pakhtunkhwa District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

.....

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{Authority: Letter No: SOR-VI/ERAD/1/12000}

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
MOB: 9377 540507


ATTESTED

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JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

Khyber Pakhtunkhwa Services Laws

1335

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance,

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

SPECIMEN NOTIFICATION.

GOVERNMENT OF KHYBER PAKHTUNKHWA
NAME OF ADMINISTRATIVE
DEPARTMENT

Dated Peshawar, _____

NOTIFICATION

NO. _____ The Competent Authority is pleased to order the transfer of Mr. _____ Department and to post him as _____ in the interest of public service, with immediate effect.

PAKHTUNKHWA
Endst. No. and date even.
Copy forwarded

- 1.
- 2.
- 3.
- 4.
- 5.

**CHIEF SECRETARY
GOVERNMENT OF KHYBER**


ATTESTED

**(NAME)
SECTION OFFICER
Administrative Department**

{Authority: Letter No. SO (E-I) E&AD/9-12/2006 dated 22-12-2006}.

The competent authority has been pleased to direct that Para 1(v) of the Posting/Transfer Policy contained in this Department letter No:SOR-I (E&AD) 1-1/85 Vol-II, dated 15-2-2003 shall stand deleted, with immediate effect, consequently allowing the authorities, competent under the KHYBER PAKHTUNKHWA Government Rules of Business, 1985 and the District Government Rules of Business, 2001 or any other rules for the time being in force, to make posting/transfers of Government servants, any time during the year, in genuinely deserving and necessary cases, in public interest, subject to strict observance of all other provisions of posting/transfer policy contained and notified vide circular letter under reference. Hence there will be no ban on posting/transfer of Government Servants in any part of the year while carrying out postings/transfers of Government Servants.

The authorities concerned will ensure that no injustice whatsoever is caused to any civil servant, public work is not suffered and service delivery is improved.

I am therefore directed to request that the provisions of posting/transfer policy, as amended to the extent above, may kindly be followed in letter and spirit in future so as to keep good governance standard in this regard.

{Authority: Letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008}.

.....
According to the policy of the provincial Government, maximum tenure on a post is three years. Contrary to the Policy, Store Keepers, Cashiers, Accountants and other ministerial staff remains posted in their particular field for long time, which may result in misuse of this position, due to which not only public exchequer may sustain loss but general public also suffers. The Provincial Government has taken serious notice of this situation & decided that all Administrative Secretaries and DCOs may submit a certificate within one month to the effect that above mentioned officials, having completed three years on their posts, have been adjusted on posts other than those they held previously.

{Authority: Urdu circular No: SOR-VI (E&AD)/05 dated 28th Oct, 2005.}

.....
The Chief Minister KHYBER PAKHTUNKHWA has directed that:-

- i) Submission of summary would not be required in case of mutual transfer.
- ii) Posting/transfer shall be made according to the policy;
- iii) Government Servants shall avoid direct submission of applications to the Chief Minister;
- iv) In genuinely deserving case, they should approach the Administrative Secretaries who could process the case according to policy;
- v) In case of direct submission of application to the Chief Minister Secretariat for Posting/ Transfer, the concerned govt servants shall be proceeded against under the prevalent rules and regulations.

{Authority: Urdu circular No; SOR-VI/E&AD/1-4/2003, dated 8-6-2004. Urdu Letter No: SOR-VI/E&AD/Misc: /2005, dated 3-1-2005.}

It has been decided with the approval of the competent authority that:-

- i) Mutual transfer would be allowed if both the concerned employees agree; except the Government Servants holding Administrative posts;
- ii) KHYBER PAKHTUNKHWA Government Rules of Business' 1985 shall be observed while issuing posting/transfer orders.

{Authority: - Urdu circular letter No: SOR (E&AD)/1-4/2005, dated 9-9-2005}

.....
The competent authority has decided that in order to maintain discipline, enhance performance of the departments and ensure optimum service delivery to the masses, the approved /prevalent policy of the posting/transfer shall be strictly followed. Government Servants violating the policy and the KHYBER PAKHTUNKHWA Govt Servants (Conduct)

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Foshwar
Mob: 0345-9465501


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FAUJI FOUNDATION HOSPITAL PESHAWAR



TRUST CREATED UNDER THE CHARITABLE ENDOWMENTS ACT 1890
FOR THE BENEFIT OF EX-SERVICEMEN AND THEIR FAMILIES

27

Redy

Tele: 9212770-3

Ref. No-6038/Adm

Date: 26 Jul 2021

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EXPERIENCE CERTIFICATE

It is to certify that Dr Anwar Khan worked as Medical Officer (Male) in Fauji Foundation Hospital Peshawar from 29 June 2001 to 06 October 2019 then as Medical Superintendent from 07 October 2019 till date. Fauji Foundation Hospital Peshawar is a 200 bedded teaching hospital affiliated with Pak International Medical College Peshawar.



Administrator
Brig Muhammad Ilyas (Retd)

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Annex

E



BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa Service Tribunal

In S.A. 6688 /2021

Diary No. 6734

Dated 01-7-2021

Dr. Faiza Mehmood Khattak, Medical Officer (BPS-17) R/o Civil Dispensary Din Bahar, Peshawar.

-----Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Health at Civil Secretariat, Peshawar.
2. Director General Health Services, Government of Khyber Pakhtunkhwa.

-----Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT - 1974 AGAINST THE IMPUGNED TRANSFER ORDER NO. SOH (E-II)/1-1/2021/ Dated 01-06-2021 OF THE OFFICE OF SECRETARY HEALTH KHYBER PAKHTUNKHWA, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM DISTRICT PESHAWAR TO DISTRICT KARAK IN UTTER VIOLATION TO THE LAW AND POLICY OF TRANSFER & POSTING GOVERNING THE SUBJECT

Filed to-day

Registrar

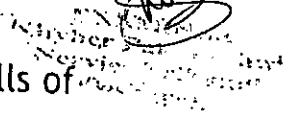
01/07/2021

Respectfully Sheweth,

1. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable family of District Peshawar.
2. That after going through the mandatorily required criteria, laid down for selection of Medical Officers, the Appellant got appointed as Medical Officer years back.
3. That since induction into service and getting onto the rolls of this extremely humane and prestigious Department, the

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of appeal. Therefore, office objection is overruled. Points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 27.07.2021 before the D.B.

The appeal is also accompanied with an application for interim relief. Notice of the same be also given to the respondents for the date already fixed. The operation of the order shall remain suspended till date fixed.


Chairman

Certified to be true copy


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

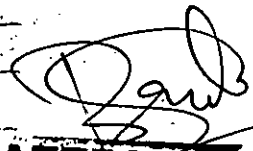
Date of Presentation of Application 27/7

Number 1200

14-00

4-00

18-00


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Date of Delivery of Copy 27/7

Date of Delivery of Copy 27/7

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قیمت 50 روپے

88207

ایڈویکٹ: کنتار احمد

بار کونسل/ایسوسی ایشن نمبر: BC10-3349

رابطہ نمبر: 03339149342



پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: مسروس رٹرنیٹل سروس

منجانب: ایسپلائٹ

دعویٰ: سروس اسپیٹل

علت نمبر: _____

مورخہ: _____

جرم: _____

تھانہ: _____

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام کنتار احمد کے لیے کنتار احمد کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز ذیل صاحب کو راضی نامہ کر کے وکیل رٹرنیٹل فیصلہ برحلاف دینے جو اب دعویٰ اقبال دعویٰ اور درخواست آڈیٹ کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری ٹیکسٹ فرم یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی قاضی کے ہمراہ یا اپنے مختار کے اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا استعمال خود بخود منظور و قبول ہوگا دوران مقدمہ میں جو چیز چاہے جانے انوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب چاہے بند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 28/07/2022

PUNJAWAR BAR ASSOCIATION

مقام کنتار احمد کے لیے منظور ہے۔

Attested & Accepted By BAKHTIAR MUHAMMAD

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

کنتار احمد

ڈائریکٹ شبانہ فدا ڈیپارٹمنٹ او سکول ڈسٹرکٹ ہیڈ کوارٹرز سوئی گریڈ کیمپس

Before The Khyber PAKHUNJHWA Senior Tribunal
PESHAWAR



Dr SHABANA Fida, Government of KPIC Sindh

Application For withdrawal of Appeal NO 7087/21

Respectfully Sheweth, Applicant submits as under

- ① That the above titled Appeal is pending administratively before this Honorable Tribunal for Today fixed 18/10/2022.
- ② That the Applicant/Appellant wants to withdraw this Appeal because her grievance has already been redressed by the Respondent/Government of KPIC.

It is therefore most humbly prayed that on acceptance of this Application the appeal of Applicant may very kindly be withdrawn.

Dated 18/10/2022 Applicant

BAKHAR MUHAMMAD

Thugh