

19.07.2022

Appellant in person present. Mr. Noor Zaman Khattak,
District Attorney present.

Representative of the respondents is absent, therefore,
notices be issued to the respondents through registered post for
submission of written reply/comments on 20.09.2022 before the
S.B at Camp Court Abbottabad.

The appellant shall submit registered A.D within 02 days.



(Salah-Ud-Din)
Member (J)

Camp Court Abbottabad

20th Sept 2022

Counsel for the appellant present. Mr. Kabirullah
Khattak, Addl;AG for respondents present.

Written reply not submitted despite last chance,
therefore their right for submission of written
reply/comments is struck of. To come up for
arguments on 15.11.2022 before D.B at camp court
Abbottabad.



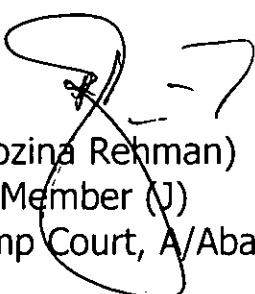
(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

16.11.2021

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

Points raised need consideration. The 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, notices be issued to the respondents for submission of reply/comments. To come up


Appellant deposited for written reply/comments on 14.03.2022 before S.B at Security Process Fee Camp Court, Abbottabad.


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

16.05.2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Written reply/comments on behalf of respondents not submitted. Learned AAG for the respondents sought time to submit the same on the fix date. Last opportunity is granted. To come for the same before S.B on 19.07.2022.

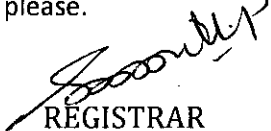

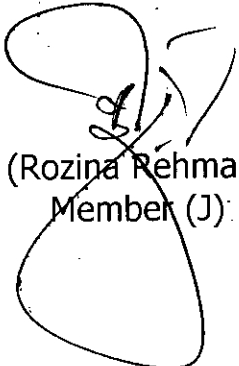

Fareeha Paul
Member (E)
Camp Court, Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7300 /2021

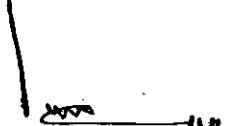
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/08/2021	<p>The appeal of Mr. Mohammad Shoab resubmitted today by Mr Humayun Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar. Notice be issued to appellant/counsel for preliminary hearing to be put up there on <u>15/10/21</u>.</p> <p> CHAIRMAN</p>
	15.10.2021	<p>Hassan Advocate, junior to counsel for appellant present.</p> <p>He made a request for adjournment on behalf of senior counsel. Adjourned. To come up for preliminary hearing on 16.11.2021 before S.B at Camp Court, Abbottabad.</p> <p> (Rozina Rehman) Member (J)</p>

The appeal of Mr. Muhammad Shoaib Chowkidar Class-iv Civil Dispensary Dakkan Tatrila A.Abad received today i.e. on 13.08.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Check list is not attached with the appeal.
- 3- Certificate be given to the effect that the appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
- 4- Copy of departmental appeal dated 05.05.2020 mentioned in para-13 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 1624 /S.T,

Dt. 13/08 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hamayun Khan Adv.
High Court A.Abad.


Respectfully Sheweth;

Reply of objection

- 1- Appeal is properly flagged.
- 2- check list is attached.
- 3- Certificate is attached.
- 4- copy of Appeal dated 05-05-2021 and mistake ~~and~~ in para No. 13 of the memo of appeal is corrected which was mistakenly wrote 05-05-2020.

It is requested instant appeal be placed before the court for further proceeding.

Dated 23/8/2021


Hamayun Khan
Advocate ATD.

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

Muhammad Shoaib
..... Appellant

Versus

Court of K P S T
..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Hamayun Advocate High Court ATD</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?	x	
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:- Hamayun Khan

Signature:- [Signature]

Dated:- 22/12/21

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 7300 /2021

Muhammad Shoaib son of Sardar Muhammad Zaman (Chowkidar/Class-IV Civil Dispensary Dakkan Tatrila), resident of Dakan Tatrila Nagri Bala District Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Health Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

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4.	Copy of appointment order	13	"A"
5.	Copy of service book	14-25	"B"
6.	Copy of transfer order dated 24/12/2018	26	"C"
7.	Copy of transfer order dated 26/02/2019,	27-28	"D"
8.	Copy of relieving report	29	"E"
9.	Copy of inquiry report	30-31	"F"
10.	Copy of impugned order dated 23.09.2019	32-35	"G"
11.	Copy of departmental appeal	36-37	"H"
12.	Wakalatnama		

...APPELLANT

Dated: 11/8 /2021

Through


(HAMAYUN KHAN)

&


(FAZLULLAH KHAN)

Advocates High Court, Abbottabad

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2021

Muhammad Shoaib son of Sardar Muhammad Zaman (Chowkidar/Class-IV Civil Dispensary Dakkan Tatrila), resident of Dakan Tatrila Nagri Bala District Abbottabad.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Health Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. District Health Officer Abbottabad.

...RESPONDENTS

**SERVICE APPEAL UNDER SECTION ARTICLE 212
OF THE CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN 1973 READ WITH SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED ORDER
DATED 23/09/20219 PASSED BY RESPONDENT
NO.3 WHERE BY PERIOD OF DUTY W.E.F
08/01/2019 TILL 18/09/2019 (254 DAYS) WAS
TREATED EXTRA-ORDINARY LEAVE WITHOUT**

PAY AND SIMILARLY STOPPED ONE ANNUAL INCREMENT WHICH IS ILLEGAL, AGAINST THE LAW, FACTS AND LIABLE TO BE SET ASIDE TO THE EXTEND OF APPELLANT.

PRAYER:- ON ACCEPTANCE OF INSTANT SERVICE APPEAL ORDER DATED 23/09/2019 PASSED BY RESPONDENT NO. 3 MAY KINDLY BE DECLARED AS NULL AND VOID, AGAINST THE LAW AND FACTS WHICH IS LIABLE TO BE SET-ASIDE. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MA ALSO BE GRANTED TO THE APPELLANT IN THE BEST INTEREST OF JUSTICE AND FIR PLAY.

Respectfully Sheweth;-

May it please your lordship appellant beg to solicit on the following factual and legal grounds;-

1. That appellant was appointed as Class-IV/Chowkidar on 07/03/2008 and was posted at Civil Dispensary Dakkan Tatrila Abbottabad.

Copy of appointment order is attached as Annexure "A".

2. That thereafter appellant submitted Arival Report and continuously performing his duty till date with full devotion and liabilities. There had no complaint against the appellant in respect of his duty and responsibilities. Copy of service book is annexed as Annexure "B".
3. That on 24/12/2018 appellant was transferred from Civil Dispensary Dakkan Tatrila to Civil Dispensary Kisala Abbottabad. Copy of order is annexed as Annexure "C".
4. That in meanwhile respondent No.3 again issued transferred order whereby appellant was transferred C.D Kissala to C.D Dakkan Tatrila.
5. That on 26/02/2019 respondent No. 3 issued transferred order of appellant whereby appellant was transferred from Civil Dispensary Dakkan Tatrila Type-D Hospital Havelian Abbottabad. Copy of transferred order is annexed as Annexure "D".

6. That on very next date on 27/02/2019 respondent No.3 withdrawn transferred order dated 26.02.2019.
7. That in the meanwhile respondent No. 3 initiated so-called inquiry against the appellant Dr. Waheed uz Zaman Khan Senior Medical Officer was appointed as Inquiry Officer.
8. That on 20.04.2019, respondent No. 3 telephonically issued directions to appellant for resuming of duty at Type-D Hospital, Havelian and appellant was relived from CD Dakhan Tatrila. Copy of relieving report is annexed as Annexure "E".
9. That after relieving and on the directions of respondent No. 3, appellant went to Type-D Hospital Havelian for assuming the charge of his duty, whereby In-Charge of the Type-D Hospital refused the same and verbally said to appellant that they have no received such kind of transfer order of the appellant, so he cannot join his duty in Type-D Hospital.

10. That thereafter appellant went to the office of respondent No. 3 for proper and black & white order in respect of his duty station but the respondent No. 3 did not give any head in this regard.
11. That on 11.09.2019 Inquiry Officer submitted his inquiry report before the respondent No. 3. Copy of inquiry report is annexed as Annexure "F".
12. That on 23.09.2019, respondent No. 3 issued impugned order whereby, appellant was directed to report for duties at Type-D Hospital Havelian, and period of duties w.e.f 08.01.2019 to 18.09.2019 (254 days) was treated extra ordinary leave without pay and stopped one annual increment and also direction was issued for deduction of salary and the said impugned order was not delivered to the appellant till 30.04.2020. Copy of impugned order dated 23.09.2019 is annexed as Annexure "G".
13. That on 30.04.2020 appellant received copy of the impugned order from the official of respondent

No. 3 and on 05.05.2020 appellant filed departmental appeal against the said impugned order before the respondent No. 2 for redressal of his grievances but till date respondent No. 2 has not given any response and not passed any order against the said appeal, hence this appeal on the following grounds. Copy of departmental appeal is annexed as Annexure "H".

GROUNDS:-

- a. That impugned order dated 23.09.2019 is against the law facts and liable to be set aside.
- b. That respondent No. 3 initiated so-called inquiry whereby, respondent No. 3 as well as Inquiry Officer not issued any charge sheet statement of allegations, show cause notice and passed impugned order, without giving any opportunity of personal hearing to the petitioner and also without complying legal formalities, hence, are liable to be set-aside.

- c. That all proceedings were conducted against the appellant without any information, intimation or any kind of notice, and similarly relevant documents as well as impugned order was not delivered to the appellant. Although respondent No. 3 under duty bound to provide the said documents to appellant but he cannot do so.

- a. That the impugned order has been passed against the basic principle of natural justice and fundamental rights, therefore are liable to be set-aside.

- b. That at the time of passing the impugned order, respondent No. 3 ignored all basic legal requirements of law and procedure.

- c. That respondent No. 3 passed impugned order on the basis of misreading and non-reading of available material on record, hence, the same is liable to be set-aside.

- d. That impugned order is against the well known precedents of superior courts as well as E&D Rules, 2011
- e. That other ground shall be urged at the time of arguments.

It is, therefore, humbly prayed that on acceptance of instant service appeal order dated 23/09/2019 passed by respondent No. 3 may kindly be declared as null and void, against the law and facts which is liable to be set-aside. Any other relief which this Honourable Tribunal deems fit and proper in the circumstances of the case may also be granted to the appellant in the best interest of justice and fair play.

Dated: 11/8 /2021

Through

SL-3
...APPELLANT


(HAMAYUN KHAN)

&


(FAZLULLAH KHAN)

Advocates High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

...APPELLANT

SL-3

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. _____/2021

Muhammad Shoaib son of Sardar Muhammad Zaman (Chowkidar/Class-IV Civil Dispensary Dakkan Tatrila), resident of Dakan Tatrila Nagri Bala District Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Health Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF OPERATION
OF IMPUGNED ORDER OF DEDUCTION FROM
SALARY OF THE APPELLANT DATED 23.09.2019
PASSED BY RESPONDENT NO. 3 TILL THE FINAL
DISPOSAL OF INSTANT APPEAL.**

Respectfully Sheweth;-

1. That the titled appeal is being filed today before this Honourable Tribunal, the contents of this application may please be read as an integral part of the same.

2. That the appellant has brought good prima facie, arguable case and balance of convenience also lies in favour of appellant.
3. That if the operation of impugned order dated 23.09.2019 is not suspended, the appellant would suffer irreparable financial loss and purpose of filing of titled appeal will be defeated.

It is, therefore, humbly prayed that on acceptance of instant application, the operation of impugned order dated 23.09.2019 may graciously be suspended till final disposal of the titled appeal.

SLB
...APPELLANT

Dated: 11/8 /2021

Through

H. Khan
(HAMAYUN KHAN)

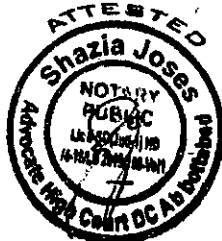
&

F. Khan
(FAZLULLAH KHAN)

Advocates High Court, Abbottabad

AFFIDAVIT:

I, do hereby solemnly affirm and declare on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



11/8/2021

DEPONENT

SLB

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2021

Muhammad Shoaib son of Sardar Muhammad Zaman (Chowkidar/Class-IV Civil Dispensary Dakkan Tatrila), resident of Dakan Tatrila Nagri Bala District Abbottabad.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Health Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR CONDONATION OF DELAY IF ANY

Respectfully Sheweth;-

The petitioner humbly submit as under;-

1. That the appeal is going to be filed before this Honourable Tribunal.
2. That it is well settled law and principle law and principle on the subject matter that limitation does not run in financial matter i.e. pay and pension etc.
3. That it is also well settled principle of law that technicalities should not be hurdled in the way and grievances of the peoples involved in such like

matters should be decided on merit not otherwise.
Hence, this application.

4. That the valuable rights of petitioner is involve in the matter in hand, keeping in view of basic right.
5. That the other points will be urged at the time of arguments.

Keeping in view the above cited submission, it, therefore, humbly prayed that by acceptance of this application the delay if any may kindly be condone.

Dated: 11/8 /2021

Through


...APPELLANT


(HAMAYUN KHAN)

Advocate High Court, Abbottabad

No.
From.

/PF/ Dated Abbottabad the

07 / 03 / 2008.

13

The Executive District Officer,
(Health) Abbottabad.

ANNEXURE Aⁿ

To.

Mr. Muhammad Shoaib S/O Muhammad Zaman
Village Puran Khaitar, Dhakhan Tatreela, PO Tatreela,
Tehsil & District, Abbottabad.

Subject:

Offer of Appointment.

In pursuance of the recommendations of the Departmental Selection Committee I am pleased to offer you a post of Chowkidar on Fixed Salary @ Rs.4000/- per month without Pension and Gratuity on the below mentioned terms & conditions.

- ⇒ Your appointment is purely temporary and can be terminated at any time with out any reason/notice.
- ⇒ The appointment will be for maximum period of One Year and after that it shall be automatically terminated with out any notice. However, if the job required to be continued the Government may execute a fresh contract subject to satisfactory previous performance of the job.
- ⇒ No TA / DA will be allowed on account of joining.
- ⇒ In case you wish to resign any time, prior one month notice or deposit of one month pay will be necessary and you shall continue to serve the Government till your resignation is accepted.
- ⇒ You will have to observe instructions issued by this office and Government from time to time.
- ⇒ Your service will be subject to your being medically fit for the Government service.
- ⇒ You will have to produce medical certificate of fitness from Medical Superintendent, DHQ, Hospital, Abbottabad.
- ⇒ Your service will be subject to being satisfactory report of verification roll.
- ⇒ You will governed by the Rules & Orders relating to leave/pay etc as may be issued by the Government from time to time.
- ⇒ If the above offer of appointment on the terms & conditions is accepted then you are hereby advised to report for duty to the Incharge of Civil Dispensary, Dhakhan Tatreela at your own expenses with in fifteen (15) days after the issuance of this appointment letter.

Executive District Officer
(Health) Abbottabad.

No. 1048 - 51

/Fixed Salary/EDO(H)ATD.

Copy to the:-

1. Incharge, CD, Dhakhan Tatreela.
2. District Accounts Officer, Abbottabad.
3. Accounts Section of the undersigned office.
4. Official concerned.

For information & necessary action.

Executive District Officer
(Health) Abbottabad.

Muhammad Shoaib
A

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

14

1. Name: Mr. Muhammad Shoaib ANNEKURE "B"

2. Race: Pakistani

3. Residence: Village old Kathiher Shaban Talwala
Taluk Dera District Abbottabad.

4. Father's name and residence: Muhammad Zaman

5. Date of birth by Christian era as nearly as can be ascertained: 30-03-1981 (Thirty March A.H Eighty one)


6. Exact height by measurement: 5-9

7. Personal marks for identification: A mark on right side of Nose

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

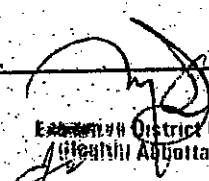
Little Finger:  Ring Finger: 

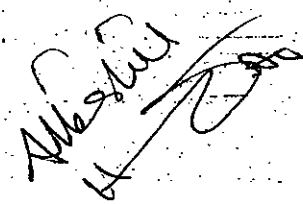
Middle Finger:  Fore Finger: 

Thumb: 

9. Signature of Government Servant: Shoaib

10. Signature and Designation of the Head of the Office, or other attesting Officer.


Executive District Officer
District Abbottabad.



15

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R. ...	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Secretary	9 Date of appointment
Frank Jay	4500/-pm		Pay Rs		1100/-pm	13-02-2008	Shore	
Chowdhary	4500/-pm							
C.D. Mishra	Peshawar							
2475-75-4725			Pay Rs		2475/-	01-07-2008		
Chowdhary B-1								
C.D. Mishra	Peshawar							
OFFICE OF THE ACCOUNTANT GENERAL NW.F.P. PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES 1 OF RS 2970-80-5570-95 AT RS 2970 P.M.W.F. With Next Increment on 1-07-2008 1-12-2008			1-7-2008					
2970-80-5670			Pay Rs		3060/-pm	12-02-2008		
Chowdhary B-1								
3150-70-209			Pay Rs		3150/-pm	12-02-2008		
Executive (Health)								
3240-100-2570			Pay Rs		3240/-pm	12-02-2008		
Executive (Health)								

OFFICE OF THE ACCOUNTANT GENERAL
 NW.F.P. PESHAWAR
 PAY FIXED IN THE REVISED BASIC PAY SCALES 1
 OF RS 2970-80-5570-95
 AT RS 2970 P.M.W.F.
 With Next Increment on 1-07-2008
 1-12-2008
 Accounts Officer
 Pay Fixation Party NW.F.P. Peshawar

Executive (Health)
 Executive
 Executive (Health)

10	11	12	13		14	15	
			Nature and duration of leave taken	Leave			
				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			Signature of the head of the office or other attesting officer
Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting Officer	Period	Government to which debtable			
Shankar			Appointed as <i>Chowkdar in Field Pay</i> 1000/- pm vide <i>E.O. (H) ATD</i> order No. 1647/PF dated 7-3-2008 with <i>out Pension Liability.</i>				
						5-206/154 By <i>[Signature]</i> 24/08 with <i>10</i> order of 23/08/08 [Signature]	
7/2008			Converted into regular Govt Servant without Pension/Liability vide <i>Cont-1</i> NWFP Finance Deptt. No 1/5/B-FDA/1523-1743 dated 31/01/2008 (<i>W.C.F. 07-7-2008</i>)				
						236. 5-1876 By <i>[Signature]</i> 24/08/08 of 15/8/08 [Signature]	
			Revised entry vide <i>13-3-2008</i> $2475 - 256425 = 256425$ $290 - 20562 = 290$				
12/2008	Executive District Officer (Health) Abbottabad	Annual Increment Allowed			Service Verified	Upto 30-11-2008 [Signature] E.D.O. (H) Abbottabad	
12/2009	Executive District Officer (Health) Abbottabad	Annual Increment Allowed			Service Verified	Upto 30-11-2009 [Signature] E.D.O. (H) Abbottabad	
12/2010	Executive District Officer (Health) Abbottabad	Annual Increment Allowed			Service Verified	Upto 30-11-2010 [Signature] E.D.O. (H) Abbottabad	

16

[Handwritten Signature]

1	2	3	4	5	6	7	8	9	10
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant	Signature and position of the head of office or other officiating officer in continuation of columns 1 to 8	Date of termination of appointment
4800-150-9300 Charak B-1			Pay Rs 5250/-pm			01/2011			
		Basic Pay Scales 2011 Office of the Accountant General Khyber Pakhtun Khawa Peshawar Pay Fixed in R.B.P.S. 2011							
		At Rs 4800-150-9300 At Rs 5250/- P.M.W.F. With Next Increment on				1-07-2011 1-12-2011			
CD Dakhlan Fakhrulla						14/9/11			
		Accounts Officer Parity K. Pakhtun Khawa Peshawar							
			Pay Rs 5400/-pm			9/12/2011		Executive District (Health) Abbottabad	
			Pay Rs 5550/-pm			9/12/2012		Executive District (Health) Abbottabad	
			Pay Rs 5700/-pm			1/12/2013		District Health Officer	
			Pay Rs 5850/-pm			1/2014		District Health Officer Vide Notif. W.E.	
			Pay Rs 6000/-pm			1/12/2014		District Health Officer Abbottabad	

Pay Fixed in 2011 of Rs...
W.E.F. 1.7.11
Department
Dated 14-7-11
Exe
57

9	10	11	12	13		14	15					
				Signature and position of the head of office or other attesting officer in Form 1 to 8	Date of termination of appointment			Reason of termination (such as promotion, transfer, dismission etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave	
											Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer
Period	Government to which debitable											
	<p>Pay Fixed in the revised Basic Pay Scale 2011 of Rs. 5250/PM BPS-1 W.E.F. 1.7.11 Vize of K.P.K. Finance Department No. PU (F-FC) 1-11/2011 Dated, 14-7-11</p> <p><i>[Signature]</i> Executive District Officer (Health) Abbottabad</p>						18					
	<i>[Signature]</i> Executive District Officer (Health) Abbottabad	Annual Increment Allowed	<i>[Signature]</i> D.O. (H) Abbottabad			Service Verified Upto 30-11-2011	<i>[Signature]</i> D.O. (H) Abbottabad					
	<i>[Signature]</i> Executive District Officer (Health) Abbottabad	Annual Increment Allowed	<i>[Signature]</i> D.O. (H) Abbottabad			Service Verified Upto 30-11-2012	<i>[Signature]</i> D.O. (H) Abbottabad					
	<i>[Signature]</i> District Health Officer Abbottabad	Annual Increment Allowed	<i>[Signature]</i> D.O. Abbottabad			Service Verified Upto 30-11-2013	<i>[Signature]</i> D.O. Abbottabad					
	<i>[Signature]</i> District Health Officer Abbottabad	Annual Increment Allowed	<i>[Signature]</i> D.O. Abbottabad			Service Verified Upto 30-11-2014	<i>[Signature]</i> D.O. Abbottabad					

[Large handwritten signature]

19

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
6210-195-12660	CD		Pay B	7770/-pm		1/2015	[Signature]
Chandhi B-I			Pay B	8095/-pm		1/2015	[Signature]
CD: Dinkhan Tarsoola			Pay B	8335/-pm		1/2015	[Signature]
6535-260-14335	CD: Dinkhan Tarsoola		Pay B	8335/-pm		1/2015	[Signature]
8040-225-17790	CD: Dinkhan Tarsoola		Pay B	10315/-pm		1/2015	[Signature]
B-3							
7770/-							
[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]
[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]
9610-380-21310	B-3		Pay B	10640/-pm		1/2015	[Signature]
[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]
[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]
[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]	[Stamp]

PAY FIX TO THE T...
2016 of Rs. 62
W.E.F. 17.16.2016
Department No. F...
Dated: 30/12/2016

District Health C...
A. Bhatnagar

Pay Fixed in the level...
of Rs. 12725

Department No. F...
Dated: 17.5.2017

District Health C...
A. Bhatnagar

No. of entries	Signature of Government Servant	Signature and position of the head of office or other officer in charge of the office in which the servant was employed from 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
						Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
							Period			Government to which debitable
7/2015		Pay fixed in the revised Basic Pay Scale 1770			Scale 01 Finance					
7/2015		Pay fixed in the revised Basic Pay Scale 1770			Scale 01 Finance					
12/2015		District Health Officer Abbottabad			Annual increment Allowed			Service Verified up to 30-11-2015		
7/16		Pay Fixed in the revised Basic Pay Scale 2016 of Rs. 19365			Scale 3				Pay actual in GS-3 @ 8355/m w.e.f 1/6/16	
12/16		District Health Officer Abbottabad			Annual increment Allowed			Service Verified up to 30-11-2016		
7/17		Pay Fixed in the revised Basic Pay Scale 2017 of Rs. 18730			Scale 2					
12/17		District Health Officer Abbottabad			Annual increment Allowed			Service Verified up to 30-11-2017		

20

W. A. Khan
H. Khan

1	2	3	4	5	6	7	8	9
Name of Post	Whether substantive or officiating and whether Permanent or temporary	If Officiating state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 374 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant	Date of termination of appointment
7610-3902136 BPs - 03			Pay Rs	13510/- Per			12/18	
								Staff Health Abhatta

2017
 Office of the Accountant General
 Peshawar
 Pay Fixed in the Revised Basic Pay Scales

10313/16
 1235/17

R.B.P.S. Pay Fixed @ Rs 1010/- 01-07-2019
 8040 325 12298 9
 R.B.P.S. 9610 290 2134 9
 Pay Fixed @ Rs 12730/- 01-07-2017
 Date of Reappointment 01-12-2017

Account Officer
 Pay Fixation Party
 Peshawar
 9/11/18

8	9	10	11	12	13		14	15
Signature of Government Servant	Nature and position of the head office or other institution in which he is appointed	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
					Period	Government to which debitable		
12/18					Annual Increment Allowed		Service Verified	22
	District Health Officer Abbottabad			DHO Abbottabad			up to 30-11-2018	
				<i>(Signature)</i>			<i>(Signature)</i>	
12/19				On the light of enquiry report conducted by the SMO Dr. Waheed Zaman IL Polio Hospital Area vice. Diary No. 4186 dated 11/09/2018, that the period i.e. 8-1-2018 to 18-05-2018 is hereby treated leave without pay. One annual increment stop vice DHO Office order No. 20704-08/Estab/10/Dispt/Action dated 28/09/2018			<i>(Signature)</i> District Health Officer Abbottabad	
				S 285				
				18/11/2020				
				13510				
				Ref. No. 137204				
				DHO Abbottabad 10600 PM				
				Approved				

Attendance Register of The

CIVIL DISPENSARY
BARKUN T. FAZILA
ANJOOTABAD

Father	Rank	Days												No. Of	Remarks			
		1	2	3	4	5	6	7	8	9	10	11	12					
ایوب اللہ	PL	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch		
محمد آصف	MD	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch	Ch		
سید الفریبی	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
ممتاز خان	B/S	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M		
محمد تنیب	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M		

[Handwritten signature and initials]

Attendance Register of The

CIVIL DISCIPLINARY
BAPTIST CHURCH
SECRETARIES

25

For the month of April 2019

Path	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. Of	Remarks	
ابراهيم العلي	Ph Tel	AS C	AS C	FOR OFFICE	AS C	AS C	AS C	AS C	FOR OFFICE	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	AS C	
عبدالله العبد	W/O	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	
الفرجاني	Dir	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
ممتاز خان	B/S	M/AS	M/AS	CL	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS	M/AS		
محمد العبد	W/O	SH	SH	UL	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH	SH		

D. HO AT D - OFFICE No, 3669-74- 27-02-2019
ORDER

(Handwritten signature)

ANNEXURE "C"

OFFICE OF THE DISTRICT HEALTH OFFICER ABBOTTABAD.

26



OFFICE ORDER

On the recommendation of inquiry report as conducted by District Coordinator DHIS Cell Abbottabad, the following staff is hereby transferred on Administrative Grounds in public interest with immediate effect till further orders.

S#	Name	From	To	Remarks
1	Mr. Muhammad Shoaib (Chowkidar)	CD Dakhan Tatrila	CD Kasala	On Administrative Grounds
2	Mr. Muhammad Khalid (Chowkidar)	CD Kasala	CD Dakhan Tatrila	Vice No Above.01
3	Mr. Mumtaz Khan (Sweeper)	CD Dakhan Tatrila	CD Danna Tatrila	On Administrative Grounds
4	Mr. Sheraz Khan	CD Danna Tatrila	CD Dakhan Tatrila	Vice No Above.03

امین سلطان ماری
- 20/11/13

Note: Compliance report be submitted within stipulated period.

District Health Officer
Abbottabad.

No. 25474-81 /Estab/D/Postings; Date: Abbottabad the 24/11/2013.

- Copy forwarded to the:-
1. Dr. Shahid Mehmood District Coordinator DHIS (Inquiry Officer).
 2. DMO IMU Abbottabad.
 3. Incharge CD Dakhan Tatrila.
 4. Incharge, CD Danna Tatrila.
 5. Incharge CD Kasala.
 6. Accounts Section undersigned office.
 7. Officials concerned.
 8. DHIS Cell
- For information and necessary action.

A. D. A.

District Health Officer
Abbottabad.

District Health Officer
Abbottabad.

ANNEXURE 'D'

OFFICE OF THE DISTRICT HEALTH
OFFICER ABBOTTABAD.

27



OFFICE ORDER

All the earlier posting / transfer orders in respect of the following officials are hereby superseded and both the concerned officials are hereby retained at Civil Dispensary Danna Tatirila with immediate effect.

1. Mr. Muhammad Shoaib Chowkidar.
2. Mr. Mumtaz Khan, Sweeper.

Consequent upon the above, both the official are hereby directed to be careful in future towards performance of Government duties and also advised to follow the service rules in true letter & spirit, else stern disciplinary action shall be taken against them under E&D Rules 2011.

District Health Officer
Abbottabad.

No. 3568-74

/Estab/D/Cancellation Dated Abbottabad the

26/2/2019.

Copy forwarded to the:

1. DMO IMU Abbottabad.
 2. Incharge, PMO Type D Hospital Havelian.
 3. Incharge, CD Danna Tatirila.
 4. Accounts Section undersigned office.
 5. Officials concerned.
 6. DHIS Cell
- For information and necessary action.

District Health Officer
Abbottabad.

District Health Officer, Civil Road, Abbottabad.

Phone: 0312-316192

Fax: 0312-316196

edohabd@pne.gov.com

28


OFFICE OF THE DISTRICT HEALTH
OFFICER ABBOTTABAD.



OFFICE ORDER

This office order bearing No.3568-74 dated 26.02.2019 regarding posting / transfer of Chowkidar & Behshti of Civil Dispensary Dakhan Tatrila is hereby stand withdrawn.

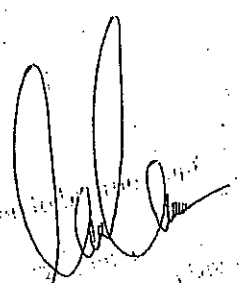
ABDUL RAUF KHAN
District & Session Judge
Consumer Court Abbottabad.

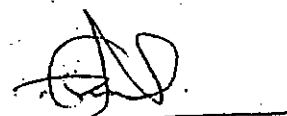

District Health Officer
Abbottabad.

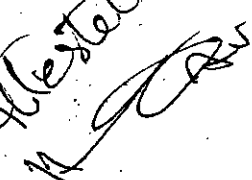
No. 3669-74 /Etab/D/Cancelation Dated Abbottabad the 27/02/2019.

Copy forwarded to the: -

1. DMO IMU Abbottabad.
 2. Incharge, PMO Type D Hospital Havelian.
 3. Incharge, CD Dakhan Tatrila.
 4. Accounts Section undersigned office.
 5. Officials concerned.
 6. DHIS Cell
- For information and necessary action.


District Health Officer
Abbottabad.


District Health Officer
Abbottabad.

Attested


District Health Officer Link Road, Abbottabad.

Phone: 0992-9711792

Fax: 0992-9510195


email: dho@tda.gov.pk

ANNEXURE 'E'

Relive letter

حضرت خان جمشید / سولہ سولہ ڈسٹری ڈکن ٹریڈ
ایجو ڈی ایچ او آفیس آرڈر نمبر 74-3669 مورخہ 27-2-2019
کے تحت آج مورخہ 20-4-2019 کو سولہ ڈسٹری ڈکن ٹریڈ
سے فارغ کر دیا ہے۔


اور ان کے تمام ڈیٹا کی سپینال حویلیاں میں حاضری رپورٹ کرو۔

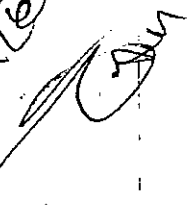

20-4-2019
M. D. P. SHAIKH
MAG. 1488
S. 1488
MAG. 1488

Relive letter

محمد شعیب چوگیا ر سولہ ڈسٹری ڈکن ٹریڈ
ایجو ڈی ایچ او آفیس لیٹر نمبر 74-3669 مورخہ 27-2-2019
کے تحت آج مورخہ 20-4-2019 کو سولہ ڈسٹری ڈکن ٹریڈ
سے فارغ کر دیا ہے۔

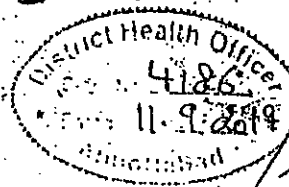
اور ان کے تمام ڈیٹا کی سپینال حویلیاں میں حاضری رپورٹ کرو۔


20-4-2019
M. D. P. SHAIKH
MAG. 1488
S. 1488
MAG. 1488

Attested


ANNEXURE "R" 30

The District Health Officer
District Abbottabad
Khyber Pakhtunkhwa



Estt
Comisary
File Dakh
N/A

Subject: - FACT FINDING REPORT

Submitted in compliance with Order No. 16186-89/Estan/D/O Dated Abbottabad 02/08/2019

Facts:

The mentioned Class-IV staff (Chowkidar & B/Sweeper) of Civil Dispensary Dhakhan Tatrila were posted to CD Dakhhan Tatrila under office order No. 25474-81/Estab/D/Posting dated Abbottabad the 24/12/2018 whereas the Arrival report submitted in stipulated time was received (Attached to ready reference). However with in three days of arrival the mentioned Class-IV order were withdrawn with casue shown in order under enquiry 779-778/Estab/D/Posting dated Abbottabad the 11-01-2019.

The order No. 3568-74/Estab/D/Cancelation dated Abbottabad 26-02-2019 superseded and both the officials were retained in Dhakhan Tatrilla with directions to comply with punctuality in duties in future (copy attached for ready reference) in case of non performance in duties disciplinary action shall be taken against them under E&D rules 2011.

The office order no. 3568-74 was with drawn through an order No. 3669-74/Estab/D/Cancelation dated 27-02-2019. However after April they staff poorly complied with the directives. In the meanwhile DHO Abbottabad ordered that the salaries of the absent period may be deposited in the Government treasury. (Copy attached).

Conclusion:

Having gone through records of various inquires, letters posted on various complaint offices and those marked by higher officer like Deputy Commissioner, Commissioner and the sequence of transfer postings done in one way or the other and the record available reflecting court decision followed by respective decision from the DHO office, I am of the opinion that the whole state of affairs is the result of personal/ familiar disputes between Mr. Sardar Shabir and Mr. Sardar Zaman, hampering service delivery and wasting the time of DHO Administration and other Govt. offices.

Attested
Raza

MPA, PR-3,
Abbottabad

25-9-2019

It is further concluded that the gap period in multiple posting/ transfers was observed very short which lead to the misunderstanding / poor compliance.

Recommendations:-

The mentioned officials should be directed to perform their duties in letter and spirit according to E&D rules under strict observation of the officials incharge at CD Dkakan Tatrila and the officials incharge shall also report their duties on monthly basis to your office for future assessment for at least six months.

DR WAHID ZAMAN
Inquiry Officer
Incharge Police Hospital
Abbottabad

Decision

- (i) Agreed with Recommendations
- (ii) Deductions must be made for the absent, non-compliance period with stoppage of current year increment as a penalty for causing interruption/difficult administrative circumstances.
- (iii) No further actions will be taken from both parties which have made this facility a place of settling scores of their other financial disputes. The department will have no other option but to close the health facility and shift it to another location, with strict departmental action against the culprits.

DDO

Attested

پولیس ہسپتال
مول ڈاکٹری و گن تریلہ تحصیل و ضلع ایبٹ آباد

form 19. as requested
the applicant

Sardar Aurangzeb Nalotha
MPA, PK-37
Abbottabad

25.9.2019

32

ANNEXURE 'G'

OFFICE OF THE DISTRICT HEALTH OFFICER ABBOTTABAD.



OFFICE ORDER:

In the light of enquiry report submitted by Dr. Waheed Zaman Khan, Senior Medical Officer Incharge Police Hospital Abbottabad received in this office vide Diary No.4186 dated 11.09.2019 and photo copies of the attendance register duly verified by Mr. Dildar Ahmed, Incharge JCT Pharmacy CD Dakhan Tatrila, the absent period in respect of Mr. Mumtaz Khan B/Sweeper & Mr. Muhammad Shoab Chowkidar under-transfer from Civil Dispensary Dakhan Tatrila w.e.f 08.01.2019 till today i.e 18.09.2019 (254 days) is hereby treated as Extra Ordinary Leave without pay on account of absence without leave. The salary of absent period must be deducted and deposited into Government Treasury positively. Moreover, one annual increment of each Mr. Mumtaz Khan & Mr. Muhammad Shoab is hereby stopped with immediate effect.

Consequent upon the above, both the officials are hereby directed to report for duties immediately at Type D Hospital Havelian and also advised to refrain from the practice of putting the administration in difficult circumstances with the remarks that no further such behavior shall be tolerated from both parties which have made this health facility a place of setting score of their other familial disputes. The Department will have no other option but to close the health facility and strict departmental action shall be taken against the culprits, who ever will disrupt service delivery.

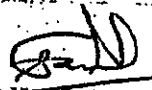

District Health Officer
Abbottabad.

No. 20704-08

(Estab/D/Disp; Action Dated Abbottabad the 23/09/2019.

Copy forwarded to the: -

1. Dr. Waheed Zaman Khan, (Enquiry Officer) Ex-Incharge SMO Police Hospital Abbottabad.
 2. Incharge, PMO Type D Hospital Havelian.
 3. Incharge, CD Dhakhan Tatrila.
 4. Accounts Section undersigned office.
 5. Official concerned.
- For information and compliance.


District Health Officer
Abbottabad.

District Health Officer Link Road, Abbottabad.

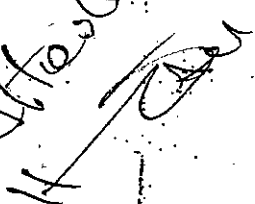
Phone # 0992-9310192

Fax # 0992-9310196

edohabd@yahoo.com

MPA, PK-3/
Abbottabad

25.9.2019

Attested


The DHO

33

Abbottabad

rough - In charge PMDC, Type-D Hospital Haveli -

Subject: Arrival Report

Sir

Reference your letter NO 20704-08.

Date 23-09-2019. I have honour to submitted
my arrival reports on 10-10-2019 kindly
accept my arrival reports. Thanks

Forwarded to DHO/ATD
for further pt.

DR. RUBINA KHAN
P.M.C.
TYPE-D HOSPITAL HAVELI
PMDG NO. 4750-71
10-10-19

Yours Obediently
Shah

Mubhammad Shabbir

Chowkidar

Type-D Hospital

Haveli -

Attested
[Signature]



OFFICE OF THE DISTRICT HEALTH
OFFICER ABBOTTABAD.

34

OFFICE ORDER:

In the light of enquiry report furnished by Dr. Waheed Zaman Khan vide Diary No.4186 dated 11.09.2019, Mr. Shoaib Chowkidar is hereby retained at Civil Dispensary Dhakhan Tatrila with immediate effect.

Consequent upon the above, the Incharge JCT Pharmacy Civil Dispensary Dhakhan Tatrila is hereby directed to keep the official concerned under strict observation at least for a period of six months and furnish his performance report to this office on monthly basis positively.

District Health Officer
Abbottabad

No. 23904-07

/Estab/D/Posting Dated Abbottabad the

06/11/2019.

Copy forwarded to the: -

1. Incharge CD Dhakhan Tatrila.
 2. Incharge PMO Type D Hospital Havelian.
 3. Accounts Section undersigned office.
 4. Officials concerned.
- For information and necessary action.

District Health Officer
Abbottabad

District Health Officer Link Road, Abbottabad.
Phone # 0992-9310192
Fax # 0992-9310196
edohabd@yahoo.com

Waheed Zaman

درت جناب ڈی ایچ اے دہلی ضلع ایسٹ آباد

عنوان: حافری رپورٹ

جناب عالی

گزارش ہے کہ سائل ایک آفس (آفس) آرڈر نمبر 23904.05 تاریخ 11/11/2019

کے مطابق 9 مورخہ 15.11.19 کو اپنی دیوٹی پر سول ڈپسٹی (ڈکن) تھریڈ میں حافری ہو گیا ہے۔

لہذا حافری رپورٹ حافری ضلع

(السلامت)

سائل محمد شعیب جو سول ڈپسٹی (ڈکن) تھریڈ

Forwarded to DHO-cab(ATI)
For information and necessary action

11/11/2019
M. DYDER AHMAD
JAIL HOUSE
CIVIL SUPPLY
JAIL HOUSE
JAIL HOUSE

Attested
[Signature]

گورنمنٹ ہسپتال، ڈی. سی. اے. سٹیٹ ہسپتال، لاہور

ANNEXURE "H"

نمبر

انٹرنیشنل ایسوسی ایشن
ڈیپارٹمنٹ 254
لاہور

ضابطہ عالی

سائنس کی تعلیم و ترویج کے لیے
سال 2008ء میں

ڈیپارٹمنٹ میں ایسوسی ایٹ پروفیسر کے طور پر
2019ء میں DHO کے طور پر

سائنس کی تعلیم و ترویج کے لیے
کے طور پر ڈاکٹریٹ کی تعلیم حاصل کی
دوران ڈاکٹریٹ کے دوران کوئی علم نہیں ہوتا تھا اور نہ
یہ کوئی توجہ تھی کہ اس دوران سائنس کی

تعمیرات مختلف جگہوں پر کی گئی تھیں
2019ء کو DHO کے طور پر سائنس کی تعلیم
انٹرنیشنل ایسوسی ایشن 254 ڈیپارٹمنٹ میں
تعمیرات کے لیے

Signature

گو سائل نے DH۰ آفس کے بالوصحابان سے
 رابطہ کیا تو دہلیوں نے کہا کہ ہمیں مذکورہ انگریزوں
 ہا کوئی علم نہ ہے اور نہ یہاں کوئی کائنات و عہدہ
 بہار سے یا اس سے ہے۔

اس کے بعد سائل بالوصحابان سے رابطہ کرنا
 اور جوئے $\frac{304}{2021}$ کو آرڈر فورم $\frac{9}{19}$ 23 ایک
 بالوصحابان سے قصیدہ طریقے سے سائل کو دیا اس
 کے سائل کی تمام حالات و احوال کا علم ہوا

سائل کے ساتھ DH۰ آفس سے بہت زیادتی
 کی ہے اور کر رہا ہے اور سائل کے گناہ سے
 اور رہبر عزیز ملک اس کو ملزم ہے۔

آج صبح سے گزارش ہے کہ سائل کی سیرکٹ
 بحال کریں اور تھوڑے سے ٹیڑھی بند کریں
 سائل ہمیشہ آپ کے لیے دعا گو رہے گا۔

العارض

محمد شعیب ولد سردار محمد رحمان چوکیدار D.C. دکن

ممبر پارلیمنٹ آف انڈیا
 مورخہ 21/5/51

Attested
 11/5/51

وکالت نامہ

کورٹ فیس

Before the K.P.K. Service Tribunal بعدالت
Muhammed Shohib نام Grant of K.P.K. عنوان
Appellant منجانب:
Service Appeal نوعیت مقدمہ:

باعث تحریر آنکہ: UTD (Pen)

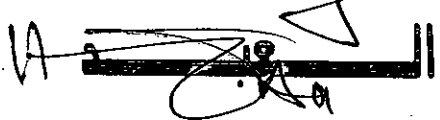
مقدمہ مندرجہ میں اپنی طرف سے واسے پیروی و جواب دہی کل کاروائی متعلقہ آس مقام
Hamayun Khan & Fazdullah Khan
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب
موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء
وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور
کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار
بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور و
قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔
نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف
پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف
مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کے
پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

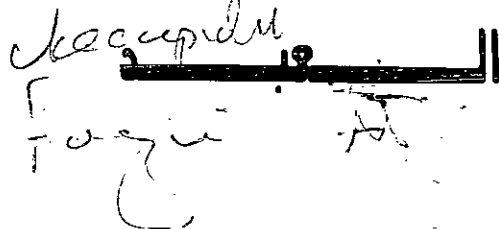
لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 11/8/2021

بمقام:

Accepted by





محمد شہید

محمد شہید

"A"

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

No.

APPEAL No. 7300 of 20 21

Mohammad Sheab

Appellant/Petitioner

Versus

Through Sayyid Haseeb Raza

RESPONDENT(S)

Notice to Appellant/Petitioner

Mohammad Sheab S/o

Sardar Mohammad Zameer

*R/o. Dahan Talzita Nagri Bala
Distt: Abbottabad*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15/10/2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Peshawar

Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar

"A"

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

Regd
No

TB AIA

APPEAL No. 7300, 7301 of 2021

Mohammad Shoib

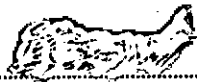
Appellant/Petitioner

Versus

Through Secy: Health Dept

RESPONDENT(S)

ROSP NO 3
Notice to Appellant/Petitioner



District Health

Office AIAbad.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20-9-22 at 8:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court
AIAbad.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

TB A/Abad.

No.

APPEAL No..... 73067300 of 20 21

Mohammad Shoib

Appellant/Petitioner

Versus

Through Secy: Health Peshawar

RESPONDENT(S)

Res P: NO 2 Director General Health
Services KPK Peshawar

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20-9-22 at 9.00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp Court
A/Abad.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.