

06 September, 2022

Appellant present in person. Mr. Kabirullah Khattak,
Addl. AG for the respondents present.

Learned AAG seeks further time to submit
reply/comments. Last chance is given. To come up for written
reply/comments on 11.10.2022 before S.B. PP is given to the
parties.



(Kalim Arshad Khan)
Chairman

11.10.2022

Appellant present in person. Mr. Muhammad Adeel
But, Additional AG for respondents present.

Written reply not submitted. Learned AAG seeks time
for submission of written reply. Request accepted subject to
cost of Rs. 2000/-. Adjourned. To come up for written
reply/comments on 17.11.2022 before S.B.



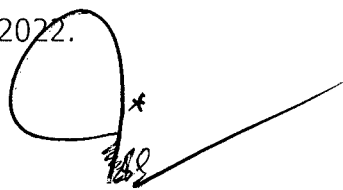
(Fareeha Paul)
Member (E)

24.05.2022

Learned counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued the case and contended that the appellant was initially appointed as Driver on contract basis for one year on 10.11.2007 whose services were regularized w.e.f. 01.07.2012 vide notification dated 27.02.2013. Presently, he is working as Medical Technician (BS-12) and posted at Sub Division Hassan Khel Peshawar since 01.10.2019. His monthly pay has been stopped without any reason or justification since June, 2021. His departmental appeal dated 02.09.2021 was not decided whereafter the instant service was instituted on 13.01.2022. On a question from the court that there is no impugned or appellate order to have been issued and challenged in the Service Tribunal? Learned counsel for the appellant replied that salary is a recurring cause and inaction and non responsiveness of the department on his departmental appeal is making cause to approach the Service Tribunal being an issue of terms and conditions of service while referring to various judgements of the Superior Courts, he concluded.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and 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 written reply/comments. To come up for reply/comments before the S.B on .05.07.2022.


(Mian Muhammad)
Member (E)

05th July, 2022

Counsel for the appellant present and submitted an application for extension of time to deposit security and process fee. Request is accepted. The appellant is directed to deposit security and process fee today. Thereafter, the local respondents be summoned through process serving agency of the learned Senior Civil Judge Peshawar. To come for written reply/comments on 06.09.2022 before S.B.


(Kalim Arshad Khan)
Chairman

Rs. 700/-
Appellant Deposited
Security & Process Fee





7/7/22

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 52/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	13/01/2022	<p>The appeal of Mr. Ashfaq Ahmad presented today by Mr. Jehanzeb Khan Khalil Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p>	28.02.2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>28/02/22</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 24.05.2022 for the same as before.</p> <p style="text-align: right;"> Reader</p>

BEFORE THE HONOURABLE CHAIRMAN SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA, PESHAWAR

Service Appeal No 52/ 2022

Ashfaq Ahmad.....(Appellant)

V E R S U S

Secretary Health and others.....(Respondent)

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE
1.	Grounds of Service Appeal with affidavit	-	
2.	Copy of the CNIC	'A'	
3.	Copy of the appointment letter	'B'	
4.	Copies of the permanent and transfer order	'C & D'	
5.	Copy of the last salary slip	'E'	
6.	Wakalat Nama (in original)	-	

Appellant

Through:

(JEHANZEB KHAN KHALIL)
Advocate,
High Court, Peshawar
Cell # 0333-9366450

Dated: -10-01-2022

BEFORE THE HONOURABLE CHAIRMAN SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA, PESHAWAR

Service Appeal No _____/2022

Ashfaq Ahmad S/O Nazeer Ahmad R/O Arbaban Matta Tehsil
Pindyali Tehsil Mohmand.....(Appellant)

V E R S U S

1. Secretary Health Department, Civil Secretariat, Khyber
Pakhtunkhwa
2. Director General, Health Services, Khyber Pakhtunkhwa
3. Deputy Director, Health Officer, Sub Division Hassan Khel,
Peshawar
4. District Health Officer, District Peshawar
5. District Account Officer, District Peshawar.....(Respondents)

Appeal against act/order (if any) of the
Respondents, wherein the Respondents
without any legal justification, the Petitioner's
salary from June, 2021 has been stopped

PRAYER-IN-APPEAL:-

On acceptance of this Appeal, by setting aside the
act/order (if any) of the Respondents, the Respondent may
kindly be directed to released the Petitioner's salary from
June, 2021 till-date.

Respectfully Sheweth:-

2

The Appellant humbly submits as under:-

- 1) That the Appellant is the natural born citizen of Pakistan and having good reputation among the locality. (Copy of the CNIC is attached as Annex 'A').
- 2) That the Appellant was appointed as Driver in the Regional Program Implementation Unit (FATA) by the Ex-Director Health Service (FATA) Secretariat vide notification No 620-22/ASM/NP dated 10-11-2007. (Copy of the appointment letter is attached as Annex 'B').
- 3) That through notification No DHS/FATA/3357-90 dated 27th February, 2013; the Appellant alongwith other were ordered permanent, while through reference No 1349-53/DDHQ/Admin/PESH dated 01-10-2019. The Appellant was appointed as Medical Technician (BPS-12) at Sub Division Hassan Khel District Peshawar through proper channel. Subsequently, the Appellant was medically examined by the authorized Medical Officer and was found fit. Eventually submitted his respective arrival report and started performing his duty. (Copy of the permanent and transfer order is attached as Annex 'C & D').
- 4) That while discharging his duty against the subject posts, all of sudden, the Respondent No 4 without showing any reason unlawfully stopped the Petitioner's salaries from

June, 2021 till-now. (Copy of the last salary slip is attached as Annex 'E'). }
}

- 5) That the Appellant feeling dissatisfied of the impugned action, approached to the Respondent No 4 for releasing his salaries by filing departmental appeal, but till-date even a single proceeding has not been conducted by Respondent No 4 nor disposed off the same, but no avail, it is pertinent to mention here that the salaries of the Appellant has unlawfully been stopped by the Respondents, despite the fact that he has been performing his duty without any interruption. (Copy of the departmental appeal is attached as Annex 'F').
- 6) That feeling aggrieved from the impugned action of the Respondents, the Appellant having no other remedy, approaches on the following grounds inter-alia:-

GROUND OF APPEAL:-

- A) That the impugned action of the Respondents is illegal, against material available on record and in contravention of principles of administration of criminal justice.
- B) That the impugned action of the Respondents is against the norms of justice, illegal and without authority, therefore, not tenable.
- C) That the impugned action of the Respondents does not qualify the requirements of fundamental right prescribed by law and the same has been passed in absolute vacuum.

- 4
- D) That in the light of judgment of superior Court as well as High Court, the salary of a public servant cannot be stopped, but despite the fact, the Respondents committed gross misconduct and stopped the Petitioner's salary from June, 2021 without any written order etc, which is liable to be set aside.
- E) That constitution has guaranteed the right to join any profession.
- F) That this Honourable Tribunal has got ample power to entertain the instant appeal.
- G) That any other grounds will be raised at the time of arguments with the permission of this Honourable Court.

It is, therefore, respectfully prayed that by accepting this Appeal, by setting aside the act/order (if any) of the Respondents, the Respondent may kindly be directed to released the Petitioner's salary from June, 2021 till-date.

Any other relief, not specifically asked for may kindly be extended in favour of Appellant in the circumstance of the case.

Appellant

Through:

(JEHANZEB KHAN KHALIL)
Advocate,
High Court, Peshawar

Dated: -10-01-2022

BEFORE THE HONOURABLE CHAIRMAN SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA, PESHAWAR

Ashfaq Ahmad.....(Appellant)

VERSUS

Secretary Health and others.....(Respondent)

AFFIDAVIT

I, Ashfaq Ahmad S/O Nazeer Ahmad R/O Arbaban Matta Tehsi Pindyali District Mohmand, do hereby solemnly affirm and declare on oath that all the contents of accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.

DEPONENT _____
CNIC # 17101-0366060-9
Cell # 0335-9292350

BEFORE THE HONOURABLE CHAIRMAN SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA, PESHAWAR

6

Mst: Naila Amin

VERSUS

E.D.O Nowshera and others

MEMO OF ADDRESSES

APPELLANT

Ashfaq Ahmad S/O Nazeer Ahmad R/O Arbaban Matta Tehsil
Pindyali Tehsil Mohmand

RESPONDENTS

1. Secretary Health Department, Civil Secretariat, Khyber
Pakhtunkhwa
2. Director General, Health Services, Khyber Pakhtunkhwa
3. Deputy Director, Health Officer, Sub Division Hassan Khel,
Peshawar
4. District Health Officer, District Peshawar
5. District Account Officer, District Peshawar

Through: Appellant
(JEHANZEB KHAN KHALIL)
Advocate,
High Court, Peshawar

Dated: -10-01-2022

Annexure "A"

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حکومت پاکستان
 قومی شناختی کارڈ
 17101-0366060-9
 نام: اشفاق احمد
 جنس: مرد
 والد کا نام: محمد
 شناختی علاقہ: کوئی نہیں
 تاریخ پیدائش: 02/11/1977
 ڈیٹا بیس نمبر: 1397651486
 ڈیٹا بیس نمبر: 1397651486

S3C3ZR 17101-0366060-9
 تاریخ: 06/08/2023
 تاریخ: 06/08/2013
 ڈیٹا بیس نمبر: 1397651486

Attested to be.
A true copy

Annexure 'B' 8

OFFICE ORDER.

Appointment Order for the post of Driver under National Programme for Family Planning and Primary Health Care.

As recommended by RPIU-FATA with his letter No. 93/NP-FATA/Mohmand Selection Dated 17/10/2007. **Mr. Ashfaq Ahmad S/O Nazeer Muhammad** of village: Arbaban Mata Tehsil: Pandialy Mohmand Agency is hereby appointed as Driver w.e.f. the date of arrival on the following terms and conditions.

1. The appointment will be purely on contract basis.
2. The appointment will be initially for one year. However, it is extendable subject to satisfactory performance.
3. He will be paid fixed pay 2700 per month.
4. He will work with Lady Health Supervisor on daily basis.
5. The appointment is strictly non-transferable.
6. If he wishes to resign, he will serve one-month notice or will deposit one-month salary in lieu of notice.
7. He will be maintaining a vehicle for field duties of the supervisor. He will be responsible for proper record on logbook and maintenance of the vehicle. In case of misuse of vehicle strict action will be taken against him.
8. In case of any accident if found guilty of negligence, proper recovery will be made from him along with appropriate action.
9. No TA/DA will be allowed during field visits within the district of posting.
10. He will be entitled for 20 days casual/sick leave in a year. He will obtain sanction of leave from district PIU through his Incharge field supervisor.
11. He will have to produce the medical fitness certificate from a duly qualified Superintendent Mohmand.
12. No TA/DA will be allowed on account of joining duty.
13. His services will not be governed under the civil servants Act 1995 but will act under the terms and conditions of this contract and no other terms that will be communicated to him from time to time. He will be bound to follow those terms which will not be changeable at any forum including courts.
14. His services can be terminated at any time without assigning any reason or notice.
15. If he accepts the offer on the above terms and conditions he is directed to report for duty to the office of the Agency Surgeon Mohmand at Ghallanai within 14 days from the date of issuance of this Office Order, failing which the offer will stand cancelled.

Sd/xxxxxxxxxxxxxxx
Agency Surgeon
Mohmand at Ghallanai

Dated Ghallanai the 10/11/07.

No. 620-22/ASM/NP
Copy forwarded to the:

1. The Assistant Programme Coordinator RPIU FATA of NP for FP & PHC Peshawar.
2. The Accountant RPIU FATA Peshawar.
3. Official concerned.

A true copy

Agency Surgeon
Mohmand at Ghallanai

Annexure C

424-172

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FATA SECRETARIAT

Marsak Road Peshawar

Dated Peshawar, February 25, 2013

NOTIFICATION

NOTIFICATION BPS-90/2013. In pursuance of the approval of Honorable Prime Minister conveyed by the Ministry of Inter-Provincial Coordination, Islamabad vide O.M. No. 50/2012-1001 dated: 21-01-2013 and in compliance with the orders of the Honorable Supreme Court of Pakistan dated: 01-02-2013 in CrI. Petition No. 15/2012, the services of the following contract employees of the National Programme for Family Planning (Phase II, Core II, Health Workers Programme) FATA are hereby regularized against the original posts mentioned against each w.e.f. 01-07-2012:-

The post of Deputy Programme Coordinator is filled by the officer of Health Department FATA on deputation.

1. Programme Management Unit FATA staff (Main office)

No.	Name	Father Name	Designation	BPS
1	Officer of Health Department on deputation		Deputy Programme Coordinator	12
2	Mr. Zahat Khan	Shah Khan	Field Programme Officer	12
3	Mr. Mansoor Sead	Saeed Ur Rehman	Field Programme Officer	12
4	Mr. Talloqar Akbar	Qasim Shah	Office Superintendent	11
5	Mr. Muhammad Noman	Nana Rehman	Accountant	11
6	Mr. Yusuf Ali	Said Bahadur	Data Analyst	11
7	Mr. Sardar Kh.	Ali Khan	Cashier	11
8	Mr. Akhtrul Islam	Fazal Rahim	Store Keeper	10
9	Mr. Akhtrul Islam	Fazal Rahim	Steno typist	10
10	Mr. Akhtrul Islam	Fazal Rahim	Office Assistant	10
11	Mr. Muhammad Imran	Shah Jehan	Data Entry operator	10
12	Mr. Kauser Hayat	Jehan Das Khan	UDC	10
13	Mr. Deud Khan	Muhammad Jehangir Khan	LDC	10
14	Mr. Shakir Ullah	Hastim Khan	Driver	10
15	Mr. Fazle Amin	Khan Razig	Driver	10
16	Mr. Faizeeh Ullah	Aj Haider	Driver	10
17	Mr. Fazal Datt	Landro Khan	Driver	10
18	Mr. Farman Ali	Rehmat Gul	Driver	10
19	Mr. Haya Khan	Haji Chaudhry	Naib Qasid	10
20	Mr. Muzakir Shan	Fata Shan	Naib Qasid	10
21	Mr. Abdul Samad	Muhammad Ali	Chowkidar	10
22	Mr. Hasan Khan	Zain Ur Rehman	Chowkidar	10
23	Mr. Munam Khan	Munam Khan	Security Worker	10

Director Health Services
FATA Secretariat, Peshawar

Akshay
A true copy

10

115	Shakira bibi	LHW	Mawat Khan	5	BHU Machar
116	Rozia	LHW	Taj Ali	5	CD Kashmir Kor
117	Miss Hudia	LHW	Sayed Muhammad	5	BHU Aqrab Sing
118	Miss Jamila	LHW	Ali Muhammad	5	BHU Aqrab Sing
119	Mehnaz wa	LHW	Noor Wah	5	BHU Aqrab Sing
120		LHW	Taj Ullah	5	BHU Aqrab Sing
121	Naseeda	LHW	Zahir Shah	5	BHU Aqrab Sing
122	Nazam Begum	LHW	Drusht Khan	5	BHU Aqrab Sing
123	Isam Bibi	LHW	Mahmood	5	BHU Aqrab Sing
124	Israt Fatma	LHW	Paor Gul	5	BHU Prang Ghar
125	Hidayat Begum	LHW	W/O Waiyat Muhammad	5	BHU Prang Ghar
126	Nizvat Begum	LHW	Karim Khan	5	BHU Prang Ghar
127	Taj Begum	LHW	Aqil Din	5	BHU Prang Ghar
128	Nore Jehan	LHW	Akhtar Gul	5	BHU Prang Ghar
129	Nor Warjana	LHW	Liaq Shah	5	BHU Prang Ghar
130	Safia Naz	LHW	Ridwan Ullah	5	BHU Prang Ghar
131	Nacema	LHW	W/O Zuta Khan	5	BHU Prang Ghar
132	Noria Bibi	LHW	Khan Afzal	5	BHU Prang Ghar
133	Safia Bibi	LHW	Rokhan	5	BHU Prang Ghar
134	Nizia Bibi	LHW	Noora Din	5	BHU Prang Ghar
135	Asia bibi	LHW	Wazir Shah	5	BHU Prang Ghar
136	Samina	LHW	Ghulam Habib	5	BHU Prang Ghar
137	Asia bibi	LHW	Amin Shah	5	BHU Prang Ghar
138	Nusrat Begum	LHW	Yousaf Khan	5	BHU Prang Ghar
139	Naseem ara	LHW	Redi Gul	5	BHU Prang Ghar
140	Niaz Parveen	LHW	Aimal	5	BHU Prang Ghar
141	Jamila	LHW	Khan Bahadar	5	BHU Prang Ghar
142	Shahzad Begum	LHW	W/O Khaista Rehman	5	BHU Prang Ghar
143	Fahra Begum	LHW	Haji Ajmer Khan	5	BHU Prang Ghar
144	Shahzida Bibi	LHW	Mehir Baddin	5	BHU Nawan Kili
145	Samina	LHW	Sher Akbar	5	BHU Nawan Kili
146	Rahmana Bibi	LHW	Zahir Muhammad	5	BHU Nawan Kili
147	Maryam	LHW	Ghulam Muhammad	5	BHU Nawan Kili
148	Qaimat Zari	LHW	Amin Shah	5	BHU Nawan Kili
149	Amra Bibi	LHW	Rafiq Khan	5	BHU Nawan Kili
150	Miss Nifasat Gul	LHW	Said Wahab	5	BHU Prang Ghar
151	Israt Begum	LHW	Wakeel Khan	5	BHU Nawan Kili
152	Naseem Wara	LHW	Niaz Mohammad	5	BHU Nawan Kili
153	Saeeda Bibi	LHW	Guli Khan	5	BHU Nawan Kili
154	Altazia	LHW	Fazil Rokhan	5	BHU Nawan Kili
155	Farhaj Begum	LHW	Gul Mast	5	BHU Nawan Kili
156	Noreen Begum	LHW	Khan Sharif	5	BHU Nawan Kili
157	Sabiha	LHW	Zigar Shah	5	AHQ-Ghaffani
158	Shahzia	LHW	Barakat	5	AHQ-Ghaffani
159	S. Nageena Bibi	LHW	S.Wazir Shah	5	AHQ-Ghaffani
160	Sandm Seema	LHW	W/O Saeed Ullah	5	AHQ-Ghaffani
161	Shamim	LHW	W/O Mozamil Shah	5	AHQ-Ghaffani
162	Saima bibi	LHW	Khan Sadeq	5	CD Kashmir Kor

Drivers (BPS-4) & (BPS-5)					
1	Wahid Khan	Driver	S/O Wahid Khan	4	APU
2	Gulshan Ullah	Driver	W/O Sadeer Khan	4	APU
3	Raja Hussain	Driver	S/O H. Syed Hasan	4	APU
4	Ashfaq Ahmad	Driver	S/O Nazeer Muht	4	APU
5	Nava Ullah	Driver	S/O Mohd Sadique	4	APU
6	Arif Khan	Driver	S/O Amir Mohammad	4	BHU Prang Ghar
7	Mi Shail	Driver	S/O Faqir Gul	4	BHU Nawan Kili

Handwritten signature
 Attached to be.
 A true copy

Director Health Services
 FATA Secretariat, Peshawar

12 (11)

Mohd Jan
Muhammad Gu

13	Mehnaz	LHW	Khyal Ameer	5	RHC Kc
13	Noor	LHW	Asif Khan	5	RHC Kc
14	Nazia	LHW	Irfan Gul	5	RHC Kc
15	Shanzia	LHW	Khan Afzal	5	RHC Kc
16	Shakeela	LHW	Asif	5	RHC Kc
17	Shahid	LHW	Tahir Shah	5	RHC Kc
18	Shahida	LHW	Nur Nawaz Khan	5	RHC Kc
19	Shahida Begum	LHW	Zameer Khan	5	RHC Kc
20	Shahida	LHW	Wahidullah	5	RHC Kc
21	Shahida	LHW	Asif Khan	5	RHC Kc

15. Kohat

1	Ah Zareen	LHW	Alijan Khan	5	BHU-Akbar
2	Nazim	LHW	Reima Khan	5	BHU-Akbar
3	Nadia	LHW	Nasir Khan	5	BHU-Akbar
4	Ramla	LHW	Khan Azam	5	BHU-Tor
5	Rozdat	LHW	Faizul an	5	CH-Zarcho
6	Shahida Begum	LHW	Masud	5	CH-Zarcho
7	Shahida Begum	LHW	Raees Jan	5	CH-Zarcho
8	Shahida A	LHW	Marjan Ali	5	CH-Zarcho
9	Fozia	LHW	Ajab Khan	5	CH-Zarcho
10	Banara	LHW	Shahidhan	5	BHU-Akbar
11	Bukhsana	LHW	Noor Said Ali	5	CH-Zarcho
12	Sahida Begum	LHW	Gul Bahadar	5	BHU-Akbar
13	Shahida Begum	LHW	Casey	5	BHU-Akbar

Additional Chief Secretary

Form No. 1/2000/1/10

Copy forwarded to:-

1. Registrar Supreme Court of Pakistan, Islamabad.
2. Additional Secretary, Ministry of Inter-Provincial Coordination, Islamabad for information w/r to his letter quoted above.
3. Secretary Finance FATA Secretariat.
4. Secretary P & O FATA Secretariat.
5. Secretary Health Khyber Pukhtoonkhawa, Peshawar.
6. Director General Health Services Khyber Pukhtoonkhawa, Peshawar.
7. ACPR Sub office Peshawar.
8. PC to Additional Chief Secretary FATA.
9. PS to Secretary Social Sector FATA.
10. All Agency Surgeons in FATA.
11. All District/Agency Accounts Officers in FATA /FRs.
12. All Agency Coordinators NP in FATA.
13. Officers / Officer's concerned.

Director Health Services

Attest
Attested to be.
A true copy



DEPUTY DISTRICT HEALTH OFFICER SUB DIVISION HASSAN KHEL PESHAWAR
Tawas khan colony ring road Peshawar city

Annexure D

12

Ref No# 1349-53/DDHO/Admin/Pesh Dated 01/10/2019

OFFICE ORDER

Consequent upon the recommendation of the Departmental Selection Committee, Mr. Ashfaq Ahmad s/o Nazeer Muhammad is hereby appointed against the sanction and vacant post of Medical technician (BPS-12) at Sub Division Hassan Khel, Peshawar, with the following terms and condition.

1. The appointment is purely based on regular basis on pay and allowance (13320-960-42180) based initially for a period of 6 months.
2. The appointment will not be transferable till to probation period.
3. The appointee shall produce a Medical Fitness Certificate from the authorized Medical Superintendent.
4. Salaries will be released after verification of all the academic documents and other codal formalities.
5. He/she shall not indulge in any trade, business and any other activity what so ever, which has been declared prohibited under civil Servants Act, 1973.
6. If he/she accept the offer on the above terms and conditions, he/she is directed to report for duty to to the In-charge of RHC Kohi within 15 days positively from the date of issuances of this offer, in case of failure, the appointment shall automatically stand cancelled and next candidate shall be considered from the waiting list.
7. He/she will not be entitled for ant TA/DA for joining Services.

Deputy Director Health Officer
Sub-Division Hassan khel, Peshawar

No 1349-53 /DDHO/Admin/Pesh

Dated 01/10 /2019

Copy to.

8. Directorate of Health Services, Tribal Districts, Peshawar
9. Accounts General, Pakistan Revenue, Sub Office Peshawar
10. Assistant Commissioner Sub Division Hassan Khel, Peshawar
11. District Health Officer, peshawar
12. Official concerned

Attested to be.
A true copy

[Handwritten signature]

Deputy Director Health Officer
Sub-Division Hassan khel, Peshawar

(Handwritten initials)

Annexure 'E'

Peshawar Dist.

S#:1 P Sec:004 Month:April 2021
 PW6637 -DHO Health Peshawar
 DHO HEALTH PESHAWAR

Pers #: 50399563 Buckle:
 Name: ISHFAQ AHMAD
 MEDICAL TECHNICIAN
 CNIC No.1710103660609
 GPF Interest Applied
 12 Active Temporary PW6637 -01

PAYS AND ALLOWANCES:

0001-Basic Pay	14,280.00
1000-House Rent Allowance	1,961.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,000.00
1985-Health Professional Allow	10,000.00
2148-15% Adhoc Relief All-2013	274.00
2199-Adhoc Relief Allow @10%	380.00
2211-Adhoc Relief All 2016 10%	1,354.00
Gross Pay and Allowances	37,889.00

DEDUCTIONS:

GPF Balance	52,992.00	Subrc:	2,220.00
4200-Professional Tax			1,000.00
3501-Benevolent Fund			1,200.00
4004-R. Benefits & Death Comp:			600.00

Total Deductions 5,020.00

32,869.00

D.O.B 02.01.1977 LFP Quota: 4
 08 Years 10 Months 001 Days HABIB BANK LIMITED SEABQADAR, CHARSADDA
 7100017903

Peshawar Dist.

S#:2 P Sec:004 Month:April 2021
 PW6637 -DHO Health Peshawar
 DHO HEALTH PESHAWAR

Pers #: 50399563 Buckle:
 Name: ISHFAQ AHMAD
 MEDICAL TECHNICIAN
 CNIC No.1710103660609
 GPF Interest Applied
 12 Active Temporary PW6637 -01

PAYS AND ALLOWANCES:

2224-Adhoc Relief All-2017 10%	1,428.00
2247-Adhoc Relief All 2018 10%	1,428.00
2264-Adhoc Relief All 2019 10%	1,428.00
Gross Pay and Allowances	37,889.00

DEDUCTIONS:

GPF Balance	52,992.00	Subrc:	
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Total Deductions 5,020.00

32,869.00

D.O.B 02.01.1977 LFP Quota:
 08 Years 10 Months 001 Days HABIB BANK LIMITED SEABQADAR, CHARSADDA
 7100017903

*Attended to be
A true copy*

انجمن صحت ضلع ہاسون ہسپتال ہاسون

اپیل چھلانہ مرحلہ اقدام عملی صورت
حصہ دوم سے عملیہ سائل کی تنخواہ
ماہ جون سے گزیر گئی ہے کی بند
کی سہولتی ہے

جناب عالی! سائل حسب ذیل ہے

1- سائل پر حکم دفعہ سن 1349-53/DDI/40/Admin/Post
تاریخ 2019/05/01 کو بذریعہ عملیہ (proper channel) مہرئی ہوا۔

(نیل ہے)

2- لیدر مہرئی سائل از ریختہ حکم مہرئی عملیہ کو جو اس کے باقاعدگی
سے عہدہ ادا کیا گیا ہے اس سے اس خدمات سرانجام دے رہا تھا تاہم جون
2021 سے عملیہ کے بلکے کسی مہرئی و مافوقی لیدر کے سائل کی تنخواہ
نہ لیا ہوا ہے۔

3- جب عملیہ سے زمانی طور سے لیدر لیا گیا ہے تو اس کے سائل
کی تنخواہ کی تفصیل کے بارے میں معلومات دینے پر اس کے لیدر کی
نہ تنخواہ کو جاری کرنے کا مطالبہ وقتاً فوقتاً تاہم اس کی خاطر خواہ
صورتوں پر اس کے ذمہ داری ہے۔

استغاثہ اعلیٰ عدلیہ نزد اعلیٰ عدالت

29/2021

تحفیل بنوری خلیفہ منیر

Medical Teachers Sub-division
Hassan Khel Post.

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قیمت
50 روپے

8106



ایڈوکیٹ:
بار کونسل/ایسوسی ایشن نمبر: BC-12-365
رابطہ نمبر: 0313-9955025

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سید محمد رسول گیلانی

مخاطب: <u>اداس گیلانی</u>	دعویٰ: <u>اداس گیلانی</u>
وکیل: <u>اداس گیلانی</u>	علت نمبر: <u>اداس گیلانی</u>
بنام: <u>اداس گیلانی</u>	مورخہ: <u>اداس گیلانی</u>
	جرم: <u>اداس گیلانی</u>
	تھانہ: <u>اداس گیلانی</u>

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے داخلے پیروی و جواب دہی کارروائی متعلقہ
آن مقام گیلانی کیلئے اداس گیلانی کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ 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
کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سدر ہے

المرقوم: 11/1/2022

الع گواہ شد الع

مقام اداس گیلانی کے لیے منظور ہے۔

اداس گیلانی

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

استغفار گیلانی

"A"

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

No.

APPEAL No. 52 of 20 22 ^{SB}

Ashfaq Ahmad

Appellant/Petitioner

Versus

Secy Health Department, Civil Secretariat KPK Pesh.
RESPONDENT(S)

Respondent (1)
Notice to Appellant/Petitioner Secy Health Department, Civil
Secretariat KPK Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 06/09/2022 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.

For Reply

Copy of Appeal
is attached

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

[Signature]
12/8/2022

"A"

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

No.

52 SB

APPEAL No..... of 20²².

Ashfaq Ahmad

Appellant/Petitioner

Versus

Soy Health Department, Civil Secretariat Peshawar

RESPONDENT(S)

Respondent (2)

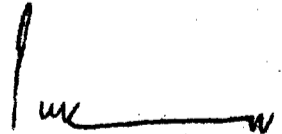
DG Health Services KPK Peshawar.

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 06/09/2022 at 9:00am.

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For Reply



Copy of Appeal is Attached

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.