

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 3781/2020

Date of Institution ... 28.04.2020  
Date of Decision ... 01.06.2022

**SCANNED  
KPST  
Peshawar**

Robina Bibi W/O Mushtaq Ali R/O Faqir Kalay Khanjar, Tehsil &  
District Mardan.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Health, Civil  
Secretariat, Peshawar and two others.

... (Respondents)

Amjad Ali,  
Advocate

... For appellant.

Kabir Ullah Khattak,  
Additional Advocate General

... For respondents.

Rozina Rehman  
Fareeha Paul

... Member (J)  
... Member (E)

**JUDGMENT**

**ROZINA REHMAN, MEMBER (J):** The appellant has invoked the  
jurisdiction of this Tribunal through above titled appeal with the prayer  
as copied below:

**“On acceptance of this appeal, the termination  
order dated 28.11.2019 may please be set aside  
and appellant may please be reinstated in service  
with all back benefits.”**

2. Brief facts of the case are that appellant was appointed as  
LHW vide appointment order dated 01.07.2004. Her services were  
regularized on 01.07.2012. During service, her explanation was

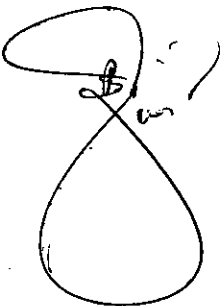
called upon and her salary was stopped, therefore, she filed writ petition for release of her salary and in the meanwhile, her termination order was passed without complying with the relevant disciplinary rules. She filed departmental appeal but fiasco, hence, the present service appeal.

3. We have heard Amjad Ali Advocate learned counsel for appellant and Kabir Ullah Khattak, learned Additional Advocate General for respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Amjad Ali Advocate learned counsel appearing on behalf of appellant, inter-alia, submitted that the appellant was not treated in accordance with law and her rights secured and guaranteed under the Constitution of Islamic Republic of Pakistan, 1973 were badly violated. Learned counsel further argued that neither charge sheet with statement of allegations nor show cause notice was issued to the appellant and no proper inquiry was conducted in the matter. He, therefore, requested for acceptance of the instant service appeal.

5. Conversely, learned AAG submitted that appellant was not performing her duty as per her service rules and she absented from official duty without permission of the competent authority, failed to maintain record and was not performing her duty properly, therefore, proper disciplinary proceedings were conducted against appellant and after compliance of all codal formalities, she was awarded major punishment according to law.

6. From perusal of the entire record, we have come to the conclusion that the service of the appellant was terminated by District



Health Officer, Mardan vide order dated 28.11.2019. The disciplinary proceedings initiated against the appellant suggest that she was not afforded proper opportunity of defense. Neither charge sheet alongwith statement of allegations nor any show cause notice was ever served upon appellant. No inquiry was conducted as nothing was produced in this regard. Proceedings so conducted are also in a hotchpotch manner, therefore, the impugned order is set aside. Appellant is reinstated in service for the purpose of de-novo inquiry to be conducted within 60 days of the receipt of this judgment with direction to respondents to decide the case through a speaking order. Needless to mention that the appellant shall be provided proper opportunity of defense during the inquiry proceedings. The issue of back benefits shall be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.  
01.06.2022

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

24-2-22

Due to return order of Justice Chiswick  
The case is adjourned to 1-6-22 for hearing.

  
Judge

ORDER

01.06.2022

Appellant present through counsel.


Kabir Ullah Khattak, learned Additional Advocate General for respondents present. Arguments heard and record perused.

Vide our judgment of today of this Tribunal placed on file, the impugned order is set aside. Appellant is reinstated in service for the purpose of de-novo inquiry to be conducted within 60 days of the receipt of this judgment with direction to respondents to decide the case through a speaking order. Needless to mention that the appellant shall be provided proper opportunity of defense during the inquiry proceedings. The issue of back benefits shall be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

01.06.2022

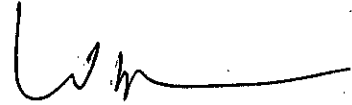
  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

30.03.2021

Counsel for appellant and Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Mushtaq Ali, for the respondents present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking further time for submission of written reply/comments. Adjourned to 09.06.2021 on which date file to come up for written reply/comments before S.B.



(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

09.06.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

The respondents have furnished Written reply. The appeal is entrusted to the D.B for arguments on 26.10.2021.

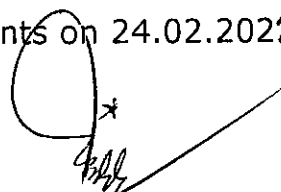


Chairman

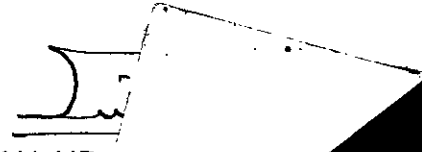
26.10.2021

Mr. Mushtaq Ali (husband of the appellant) present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Husband of 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 24.02.2022 before the D.B.



(MIAN MUHAMMAD)  
MEMBER (E)



(SALAH-UD-  
MEMBER

07.12.2020

Husband of appellant on behalf of appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Representative of respondents is not in attendance, therefore, case is adjourned on the request of learned A.A.G with direction to submit written reply/comments on 27.01.2021 before S.B.

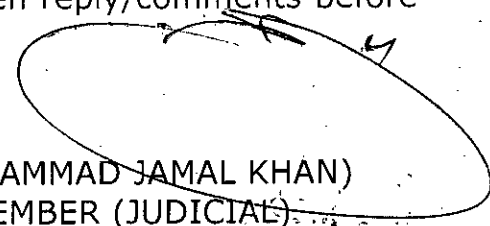


(Rozina Rehman)  
Member (J)

27.01.2021

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Saleem Javed, Litigation Officer, for the respondents are also present.

Written reply on behalf of respondents not submitted. Representatives of the department are seeking further time for submission of written reply/comments. Adjourned to 30.03.2021 on which date file to come up for written reply/comments before S.B.



(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

3781/20

08.10.2020

Counsel for the appellant present.

The appellant has submitted an application for placing on record some additional documents necessary for just conclusion of the case. Alongwith the application, copies of documents are also attached.

As the proceedings in the case are at initial stage, application is allowed. The submitted documents are made part of the record.

Learned counsel straightaway referred to the impugned order dated 28.11.2019, whereby, the appellant was terminated from service with immediate effect due to certain charges including that of non-compliance to the office of DHO Mardan, non-performing duties in Polio Campaign and proved guilty of gross misconduct/misbehavior with the officials. The impugned order did not mention of regular/proper enquiry having been conducted against the appellant while major penalty was imposed upon her. It is added that the appellant was never provided any opportunity to defend her cause.

Subject to all just exceptions, instant 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. To come up for written reply/comments on 07.12.2020 before S.B.

Appellant Deposited  
Security & Process Fee

76/10/20

  
Chairman

19.05.2020 Nemo for the appellant. Adjourned. To come up for preliminary hearing on 03.06.2020 before S.B. *Notice to be issued to appellant and counsel on*

*M.A.*

(M. Amin Khan Kundi)  
Member (J)

03.06.2020

Nemo for the appellant.

Notices as required on 19.05.2020 seem to have not been issued. Fresh notices be issued to appellant/counsel for the next date of hearing. To come up for preliminary hearing on 12.08.2020 before S.B.

  
Chairman

12.08.2020

Counsel for the appellant present.

Learned counsel requests for time to bring on record the order pertaining to regularization of service of appellant and some other relevant documents.

May do so on or before next date of hearing. Adjourned to 08.10.2020 before S.B.

Chairman 



Form- A


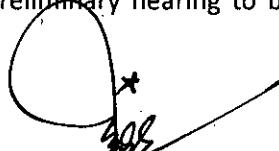
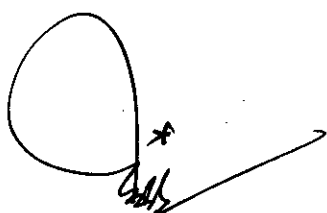
# FORM OF ORDER SHEET

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

Case No.-

3781

/2020

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1-    | 28/04/2020                | <p>The appeal of Mst. Robina Bibi presented today i.e 28.04.2020 by Mr. Amjad Ali Advocate, may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR 28/4/2020</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up on <u>11-05-2020</u></p> <p style="text-align: right;"><br/>MEMBER</p> <p>11.05.2020</p> <p>Nemo for the appellant. Adjourned To come up for preliminary hearing on 19.05.2020 before S.B.</p> <p style="text-align: right;"><br/>(Mian Muhammad)<br/>Member</p> |

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

Service Appeal No. 3781 /2020

Robina Bibi.....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through  
Secretary Health, Civil Secretariat, Peshawar,....Respondents

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*Robina Bibi*

Appellant

Through

  
Amjad Ali (Mardan)

Advocate

Supreme Court of Pakistan

Cell: 0321-9882434

①

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

Service Appeal No. 3781 /2020

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 3114

Dated 28-4-2020

Robina Bibi W/o Mushtaq Ali  
R/o Faqir Kallay Khanjar,  
Tehsil & District Mardan.....Appellant

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Civil Secretariat, Peshawar.
2. Director General Health, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. District Health Officer, Mardan.

....Respondents

**Filed to-day**  
*ew.*  
**Registrar**  
28/4/2020

**SERVICE APPEAL U/S 4 OF SERVICE  
TRIBUNAL ACT, 1974 AGAINST  
TERMINATION ORDER DATED 28.11.2019  
PASSED BY RESPONDENT NO.3, AND  
DEPARTMENTAL APPEAL DATED  
11.12.2019, REMAINED UNRESPONDED,  
EVEN AFTER LAPSE OF 90 DAYS, WHICH IS  
ILLEGAL, AGAINST LAW AND FACTS.**

**PRAYER**

**On acceptance of this appeal, the  
termination order dated 28.11.2019 may  
please be set-aside and appellant may please  
be reinstated in service with all back  
benefits.**

2

**Respectfully Sheweth:-**

- 1) That appellant filed WP No.2212/2019 for release of his salary. **(Copy of grounds writ petition is Annex "A")**
- 2) That notices in above mentioned writ petition have been issued to the department.
- 3) That valid and genuine reason has been submitted for non-performing of duty on a single date in Polio Programme, rest appellant remained punctual and performed her duty.
- 4) That the signal incident has been stretched so much that inspite of performance of duty, salary of appellant has been stopped since September, 2017.
- 5) That in response to letter dated 08.11.2019 appellant appeared, but no meaningful hearing was afforded to appellant. **(Copy of letter dated 08.11.2019 is Annex "B")**
- 6) That respondent passed termination order dated 28.11.2019, without complying with the relevant disciplinary rules. **(Copy of termination order dated 28.11.2019 is Annex "C")**
- 7) That appellant filed departmental appeal dated 11.12.2019, but no response even after lapse of 90 days. **(Copy of departmental appeal is Annex "D")**

8) That the impugned termination order dated 28.11.2019 is illegal, against law and facts on the following grounds:-

**GROUND.**

- A. Because appellant has been once penalized for stoppage of salary due to non-performance of poli, which was inability of appellant due to genuine reasoning and writ petition.
- B. Because appellant has never disobeyed any order.
- C. Because appellant has never committed misconduct.
- D. Because appellant has not been given any charge sheet.
- E. Because appellant has not been given any show cause notice.
- F. Because appellant has not been associated with any inquiry.
- G. Because appellant is jobless after termination.
- H. Because appellant is qualified for the post and satisfactory performing her duty. **(Copy of certificates are Annex "E")**
- I. Because appellant is in service of respondent department <sup>since</sup> ~~service~~ 16-6-2004 till termination order dated 28.11.2019. **(Copy of appointment order dated 16-6-2004 is Annex "F")**

(11)

It is therefore, humbly prayed that on acceptance of this appeal, termination order dated 28.11.2019 may please be set-aside and appellant may please be reinstated in service with all back benefits.

Any other relief which this hon'ble court deems appropriate in the circumstances of the case though not specifically asked for may kindly also be granted.

Dated:

*Robina Bibi*

Appellant

Through

*[Signature]*

**Amjad Ali (Madan)**

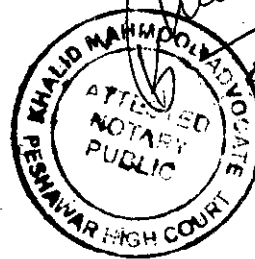
Advocate

Supreme Court of Pakistan

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

**ATTESTED**



(5)

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

Service Appeal No. \_\_\_\_\_/2020

Robina Bibi.....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through  
Secretary Health, Civil Secretariat, Peshawar,....Respondents

**ADDRESSES OF PARTIES**

**APPELLANT**

Robina Bibi W/o Mushtaq Ali  
R/o Faqir Kallay Khanjar,  
Tehsil & District Mardan

**RESPONDENTS**

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Civil Secretariat, Peshawar.
2. Director General Health, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. District Health Officer, Mardan.

*Robina Bibi*

Appellant

Through

*[Signature]*  
Amjad Ali (Mardan)

Advocate

Supreme Court of Pakistan

بعد التصلب سوسکی طر سوسکی لادان

(29)

2020ء منجانب اسلام آباد

26/4/2020

مورخہ:

مقدمہ:

دعویٰ:

جرم:

بنام:

روبینہ بی بی

حکومت

سوسکی اصل  
باجوئے نجر بر آندہ

مقدمہ مندرجہ عنوان بالا اپنی طرف سے واسطے پیردی و جواب دہی وکل کاروائی متعلقہ

آج کے مقدمہ کیلئے امجد علی ایڈووکیٹ، سپریم کورٹ آف پاکستان اسلام آباد

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ

بر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء وصول چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زاریں پر

دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیردی کرنے کا

اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ برواختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ و جانہ

التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیردی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سنڈ رہے۔

المرقوم:

2020ء  
العبد

20  
گواہ

العبد

بمقام کے لیے منظور ہے۔

Allah Amjad Ali  
ADVOCATE  
SUPREME COURT

Robina B...

امجد علی ایڈووکیٹ سپریم کورٹ آف پاکستان، ڈسٹرکٹ کورٹس، مردان

0321-9882434 0321-9870175



**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA**

**SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO. 3781 OF 2020**

Robina Bibi.....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa and others.....Respondents

**Respectfully Sheweth:**

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS**

**Preliminary Objections:-**

- a. That the Appellant has got neither cause of action nor did locus standi to file the instant Appeal.
- b. That the Appellant has filed the instant Appeal just to pressurize the respondents.
- c. That the Appellant was repeatedly not performing her duty in Polio campaigns (which is a "National Emergency" declared by President of Pakistan) as per their Terms of Reference (TOR), which is clearly mentioned in "The Khyber Pakhtunkhwa Regulation of Lady Health Workers Program Employees Service Rules, 2015"**(Annexed – I)**
- d. That giving several warnings / explanations by Respondent No. 03, but the Appellant repeatedly ignored them **(Annexed – II)**.
- e. That Civil Servants Act is not applicable to the Appellant. Hence the Honorable Court has no Jurisdiction to adjudicate the matter.
- f. That the instant Appeal is against the prevailing Law and Rules.
- g. That the Appeal is not maintainable in its present form and also in the present circumstances of the issue.
- h. That the Appellant has filed the instant Appeal with mala-fide intention hence liable to be dismissed.
- i. That the Appellant has not come to the Tribunal with clean hands.
- j. That the Appeal is time barred.
- k. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
- l. That the instant Appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.

**ON FACTS:**

1. Pertain to record, hence no comment.
2. Correct. Writ Petition No. 2212/2019 had been addressed on time.
3. Incorrect. The Appellant's intentions are malicious and bias and purposely deceiving the Court of law by not telling the truth, as clearly mentioned several reasons of the termination in the appellant's termination order. **(Annexed - III)**.
4. Incorrect. The Appellant was not performing her duty as per her service rules, besides several warnings / explanations, which she persistently and intentionally ignored **(Detailed reply with annexures given in Supra Para No. 3 & 4 of the Preliminary Objections)**.
5. Incorrect. The Appellant did not even bother to appear for hearing.
6. Incorrect. Proper disciplinary proceedings had been conducted against the Appellant e.g. explanation, personal hearing, show cause **(Annexed – IV)**.
7. Incorrect. The Departmental Appeal had never been received by the Respondent No. 03, even if so, it does not conceal her gross misconduct / misbehavior and lack of interest towards official duty including non-compliance to the office orders by her superiors.

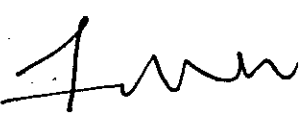
8. Incorrect. The termination order dated 28.11.2019 is legal and as per "The Khyber Pakhtunkhwa Regulation of Lady Health Workers Program Employees (Regularization and Standardization) Act, 2014" and "The Khyber Pakhtunkhwa Regulation of Lady Health Workers Program Employees Service Rules, 2015" (Annexed - V)

**ON GROUNDS:**

- A. Incorrect. The previous penalty which the Appellant mentioned herself, shows the lack of interest towards her duty.
- B. Incorrect. The several warnings / explanations by the Respondent No. 03 and their non-compliance clearly show the disobedience of the Appellant (As explained in Supra Para No. g of the Preliminary Objections).
- C. Incorrect. The Appellant committed gross misconduct / misbehavior with her superiors (Annexed - VI).
- D. Incorrect. Reply has already been furnished in Para No. 6 of the Facts.
- E. Incorrect. Proper Show Cause notice had already been issued to the Appellant but the Appellant did not even bother to consider it seriously.
- F. Incorrect. The Appellant had not been associated with inquiry because the Appellant's gross misconduct / misbehavior and several warnings / explanations clearly shows guiltiness of the Appellant.
- G. No comments.
- H. Incorrect. Several warnings / explanations were issued / called but her lack of interest towards her duty, along with her behavior with the superiors, clearly shows the Appellant's performance.
- I. Pertain to record, hence no comment.

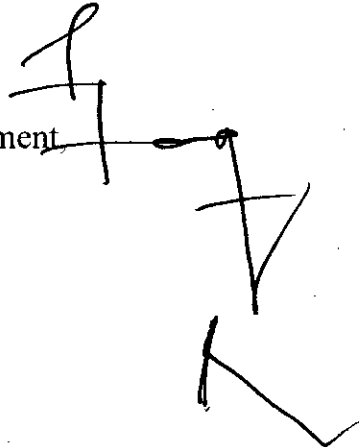
**PRAYER:**

It is therefore humbly prayed that on acceptance of the comments, the instant Appeal of the Appellant may very graciously be dismissed with costs.


  
Secretary Health Department  
Khyber Pakhtunkhwa  
**Respondent No. 01**

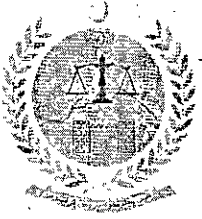
*Fey*

**SECRETARY HEALTH**



District Health Officer Mardan  
**Respondent No. 03**  
District Health Officer  
Mardan

  
Director General Health Services,  
Khyber Pakhtunkhwa.  
**Respondent No. 02**  
DIRECTOR GENERAL  
HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR



**KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

No: \_\_\_\_\_/ST Dated: \_\_\_\_/\_\_\_\_/2022

To,

District Health Officer,

Mardan.

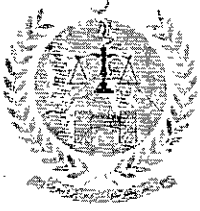
**Subject: JUDGMENT IN APPEAL NO. 3781/2020 OF ROBINA BIBI VS HEALTH.**

I am directed to forward herewith a certified copy of Judgement dated 01.06.2022 passed by this Tribunal on the above subject for information.

Encl: As Above.

  
(WASEEMAKHTAR)

REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR



**KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

No: \_\_\_\_\_/ST Dated: \_\_\_\_/\_\_\_\_/2022

To,

District Health Officer,  
Mardan.

Subject: JUDGMENT IN APPEAL NO. 3781/2020 OF ROBINA BIBI VS HEALTH.

I am directed to forward herewith a certified copy of Judgement dated 01.06.2022 passed by this Tribunal on the above subject for information.

Encl: As Above.

  
(WASEEMAKHTAR)

REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR

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

PH

C.M.No. \_\_\_\_\_/2020

IN

S.A.No. 3781/2020

Robina Bibi.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through  
Secretary Health, Civil Secretariat, Peshawar....Respondents

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| S.No. | Description of Documents                     | Annexure | Pages. |
|-------|--|----------|--------|
| 1.    | Application for additional documents.        |          | 1      |
| 2.    | Affidavit.                                   |          | 2      |
| 3.    | Copy of Office order No.13816                |          | 3      |
| 4.    | Copy of notification dated 19.09.2014        |          | 4      |
| 5.    | Copy of application to DHO, Mardan           |          | 5      |
| 6.    | Copies of medical documents                  |          | 6-10   |
| 7.    | Copy of application to DHO, Mardan           |          | 11     |
| 8.    | Copy of domicile certificate                 |          | 12     |
| 9.    | Copy of DMC & Secondary School Certificate   |          | 13-14  |
| 10.   | Copy of annual report of LHV                 |          | 15-20  |
| 11.   | Copy of application Ex-Pakistan leave        |          | 21     |
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| 13.   | Copy of letter dated 19.09.2017              |          | 27     |
| 14.   | Copy of application to DHO, Mardan           |          | 28     |
| 15.   | Copy of application to DHO, Mardan           |          | 29     |
| 16.   | Copy of application to DHO, Mardan           |          | 30     |
| 17.   | Copy of Form Bay                             |          | 31     |
| 18.   | Copy of letter to appellant dated 12.03.2019 |          | 32     |
| 19.   | Copy of monthly salary statement             |          | 33     |

  
Appellant

Through

  
Amjad Ali (Mardan)

Advocate Supreme Court

Cell: 0321-9882434

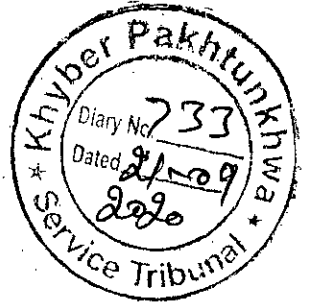
(1)

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

C.M.No. \_\_\_\_\_/2020

IN

S.A.No. 378/2020



Robina Bibi.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through  
Secretary Health, Civil Secretariat, Peshawar....Respondents

**APPLICATION PLACING ON FILE  
ADDITIONAL DOCUMENTS BEING  
NECESSARY FOR JUST DECISION OF  
THE CASE ON MERIT**

**Respectfully Sheweth;**

1. That the above titled appeal is pending adjudication before this Hon'ble Court, wherein no date of hearing has been fixed so far.
2. That through instant application, the appellant wants to place on file some necessary documents, which were not available at the time of submission of titled petition, hence this application.

It is therefore, humbly requested that on acceptance of this application, the documents attached with the instant application may graciously be placed on file.

Put up to the court with  
relevant appeal.

Ready

21/9/2020

Appellant

Through

Amjald Ali (Mardan)

Advocate

Supreme Court of Pakistan

(2)

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

C.M.No. \_\_\_\_\_/2020

IN

S.A.No. 3781 /2020

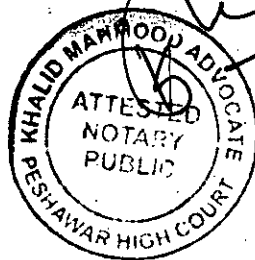
Robina Bibi.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through  
Secretary Health, Civil Secretariat, Peshawar....Respondents

**AFFIDAVIT**

I, **Amjid Ali Advocate** (Counsel for appellant) do hereby affirm and declare as per information furnished my by client that the contents of the accompanying **Application** are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Court.



  
Deponent

خیبر پختونخوا ریگولیشن آف لیڈی ہیلتھ ورکروز پروگرام اینڈ ایمپلائز (ریگولر انڈرٹیکنگ اینڈ سٹینڈرڈ انڈرٹیکنگ) ایکٹ مجریہ 2014 کی شق نمبر (1) کے تحت معاہدہ کی بنیاد پر کام کرنے والے درج ذیل ملازمین کی ملازمت کو مورخہ 2012-07-01 سے مستقل بنیاد پر باقاعدہ تصور کیا جاتا ہے۔ ان کی ملازمت کی قیود و شرائط مذکورہ بالا ایکٹ اور اس کے تحت بتائے جانے والے قواعد کے مطابق ہوں گی۔

| سیر نمبر | نام ملازم     | والد کا نام    | شوہر کا نام    | عہدہ | تاریخ تقرری | مرکز صحت کا نام   | متعلقہ علاقہ کا نام    |
|----------|---------------|----------------|----------------|------|-------------|-------------------|------------------------|
| 1        | Ulfat Bibi    |                | Gulab Din      | LHW  | 01/03/2001  | BHU Khazana Dheri | Kandary                |
| 2        | Dil Naz Begum |                | Fazal Mohammad | LHW  | 01/03/2001  | BHU Khazana Dheri | Khazana Dheri          |
| 3        | Robina Bibi   |                | Mushtaq Ali    | LHW  | 01/07/2004  | BHU Khazana Dheri | Faqir killi            |
| 4        | Shaheen Begum | Baklit Munir   |                | LHW  | 01/08/2005  | BHU Khazana Dheri | Khazana killi          |
| 5        | Tahira Naz    | Sarfraz        | Riaz           | LHW  | 01/08/2005  | BHU Khazana Dheri | Pul koti               |
| 6        | Yasmeen Gul   |                | Nisar          | LHW  | 01/08/2005  | BHU Khazana Dheri | Khanpur killi          |
| 7        | Jamila Bibi   |                | Nihar Ali      | LHW  | 01/08/2005  | BHU Khazana Dheri | Par makhai nisata road |
| 8        | Shaheen       |                | Said Muhammad  | LHW  | 01/02/2008  | BHU Khazana Dheri | Bagh killi             |
| 9        | Rahat Bibi    |                | Niaz Ali Khan  | LHW  | 01/02/2008  | BHU Khazana Dheri | Purana kandary         |
| 10       | Irum          | Hazrat Hussain |                | LHW  | 01/07/2009  | BHU Khazana Dheri | Bakri banda            |

مذکورہ بالا ایکٹ کی شق نمبر 2 میں تفویض کردہ اختیارات کو بروے کار لاتے ہوئے کمیونٹی سے منسلک ملازمین کو مندرجہ ذیل بنیاد ی تنخواہ کے سکیل میں رکھا جاتا ہے۔

| بنیادی تنخواہ کا سکیل | عہدہ کا نام         | نمبر شمار |
|-----------------------|---------------------|-----------|
| 7                     | لیڈی ہیلتھ سپروائزر | 1         |
| 5                     | لیڈی ہیلتھ ورکر     | 2         |
| 4                     | ڈرائیور             | 3         |

ڈسٹرکٹ ہیلتھ آفیسر مردان

نقل برائے اطلاع:

1. پروانسل کوارٹینئر لیڈی ہیلتھ ورکرز پروگرام خیبر پختونخوا پشاور۔
- 2.
- 3.

*Amjad Ali*  
ADVOCATE  
SUPREME COURT





District Health Department – Mardan  
DISTRICT HEALTH OFFICER  
Mardan (Khyber Pakhtunkhwa)  
Ph: # (0937) 9230030 Fax: # (0937) 9230349  
Email: [edohmr@yahoo.com](mailto:edohmr@yahoo.com)

(4)

No. 13816 /DHO Mardan Dated 19/9/2014

**NOTIFICATION**

In terms of Section 4 (1) read with 1<sup>st</sup> Proviso there under, of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Program and Employees (Regularization and Standardization) Act 2014, services of the following Lady Health Workers Program employees of district Mardan Khyber Pakhtunkhwa are hereby regularized w.e.f. 1<sup>st</sup> July 2012. Their terms and conditions of service will be governed under the Khyber Pakhtunkhwa Regulation of Lady Health Workers Program and Employees (Regularization and Standardization) Act, 2014 and rules to be made there under.

| Sr. No | Name of Community Embedded Employee | Father Name    | Husband Name   | Designation | Date of appointment | FLCF              | Name of Catchment Area |
|--------|-------------------------------------|----------------|----------------|-------------|---------------------|-------------------|------------------------|
| 1      | Ullat Bibi                          |                | Gulab Din      | LHW         | 01/03/2001          | BHU Khazana Dheri | Kandary                |
| 2      | Dil Naz Begum                       |                | Pazal Mohammad | LHW         | 01/03/2001          |                   | Khanjar                |
| 3      | Robina Bibi                         |                | Mushtaq Ali    | LHW         | 01/07/2004          | BHU Khazana Dheri | Faqir killi            |
| 4      | Shaheen Begum                       | Bakht Munir    |                | LHW         | 01/08/2005          | BHU Khazana Dheri | Khazana killi          |
| 5      | Tahira Naz                          |                | Riaz           | LHW         | 01/08/2005          | BHU Khazana Dheri | Pul koti               |
| 6      | Yasmeen Gul                         |                | Nisar          | LHW         | 01/08/2005          | BHU Khazana Dheri | Khanpur killi          |
| 7      | Jamila Bibi                         |                | Nihar Ali      | LHW         | 01/08/2005          | BHU Khazana Dheri | Par makhai nisata road |
| 8      | Shaheen                             |                | Said Muhammad  | LHW         | 01/02/2008          | BHU Khazana Dheri | Bagh killi             |
| 9      | Rahat Bibi                          |                | Niaz Ali Khan  | LHW         | 01/02/2008          | BHU Khazana Dheri | Purana kandary         |
| 10     | Irum                                | Hazrat Hussain |                | LHW         | 01/07/2009          | BHU Khazana Dheri | Bakri banda            |

In exercise of powers conferred under sub section (2) of the Section ibid, the above Community Embedded Employees are placed in the following pay scales as mentioned against their respective designations.

| Name of Post           | Basic Pay Scale |
|------------------------|-----------------|
| Lady Health Supervisor | 7               |
| Lady Health Worker     | 5               |
| Driver                 | 4               |

District Health Officer  
Mardan

Copy forwarded to,

1. Provincial coordinator LHWs Program, Khyber Pakhtunkhwa.
2. All concerned.

5

Through Proper Channel

To,  
The District Health Officer,  
Mardan.

From  
Robina Mushtaq LHW  
BHU Khazana Dheri Mardan.

Subject:- Application for Maternity leave.

Respected Sir,

It is to state in your honour that I am suffering from maternity problem, as I am unable to attend my BHU, therefore, grant me maternity leave from 17-01-2018 to 02-03-2018. I shall be thank full for this kindness. Clinical report is hereby attached with.

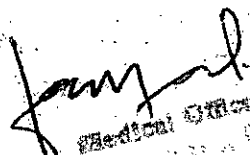
Thanks

Yours sincerely,



Robina Mushtaq  
LHW, BHU, Khazana Dheri,  
Mardan.

Forwarded  
to DHO  
Mardan,  
for M/A.

  
Medical Officer  
BHU Khazana Dheri



# DISTRICT HEAD QUARTER HOSPITAL MARDAN

6

## Out Patient Department

|            |                |         |           |      |    |
|------------|----------------|---------|-----------|------|----|
| OPD #      | 100            | Date    | 1/17/2018 | Paid | 10 |
| Name       | Robina Mushtaq | Sex     | Female    |      |    |
| H/F/Name   | Age            |         | 0         |      |    |
| Department | Gynae          | Contact | 0         |      |    |
| Address    | 0              |         |           |      |    |

History  
P12 1202/90

Clinical Examination

Provisional Diagnosis

Investigations Required

OBSCUS

Robina Mushtaq She

34 weeks pregnant

US says maturity of foetus

well from 17/1/18 till

Date

IR

17/1/18



**DISTRICT HEAD QUARTER HOSPITAL  
MARDAN**  
Out Patient Department

(7)

|            |        |         |           |      |    |
|------------|--------|---------|-----------|------|----|
| OPD #      | 93     | Date    | 1/17/2018 | Paid | 10 |
| Name       | Robina | Sex     | Female    |      |    |
| H/F/Name   |        | Age     | 0         |      |    |
| Department | Gynae  | Contact | 0         |      |    |
| Address    | 0      |         |           |      |    |

(3)

History

13p 120/80

Clinical Examination

Provisional Diagnosis

Investigations Required

- COP Footprint

- Feets Core 1000 @ 7/11/18

- COP Certified 4004  
025 2/1/18

- Feets done 12/14  
2/1/18

**DISTRICT HEAD QUARTER HOSPITAL MARDAN**  
**RADIOLOGY DEPARTMENT**

ULTRASOUND REPORT

Name: Robina

Date: 17-1-10

(8)

Obstetric Ultrasound:

Single alive intra uterine fetus with cephalic presentation at the time of scan

- \* Placenta is on upper segment. fudal.
- \* Liquor is within normal limit at the time of scan.
- \* No gross fetal anomaly seen at the time of scan.
- \* BPD = 85 mm. FL = 68 mm.
- \* GESTATIONAL AGE = 34 Weeks. EDD = 27-2-18

COMMENTS:

SINGLE ALIVE FETUS OF 34 WEEKS WITH CEPHALIC PRESENTATION.

Dr. Name Dr. Nawaz's



**DISTRICT HEAD QUARTER HOSPITAL  
MARDAN**  
Out Patient Department

(9)

|            |         |         |           |      |    |
|------------|---------|---------|-----------|------|----|
| OPD #      | 259     | Date    | 23-Feb-18 | Paid | 10 |
| Name       | Robina  | Sex     | Female    |      |    |
| H/F/Name   |         | Age     | 01        |      |    |
| Department | Medical | Contact | 0         |      |    |
| Address    | 0       |         |           |      |    |

(18)

History

BP  $\frac{110}{70}$

Clinical Examination

Provisional Diagnosis

Investigations Required

It is certified that Robina w/o Mustaq Ali can Avail Post natal leave of 45 days from today onwards (23/2/18 — 18/04/18).

attend all be

**W.M.O  
D.H.Q MARDAN**

**W.M.O  
D.H.Q MARDAN**

< 23/2/18

heri,

Electronic Receipt : DHQ Mardan Design by NDSOFT 03139826432

forwarded to DHO, Mardan for N/A.

*[Signature]*  
Medical Officer  
Ghazal Khazana Dheri  
Mardan



MARDAN MEDICAL COMPLEX

Teaching Hospital Mardan KPK

10

Name: Robina Sex: Female

Department: GYN: A Address: Mardan

OPD No: 170815244 Date: 15-Sep-2017

Entered by :- WAHEEDGUL / 08:57:15 AM

History

Clinical Examination

Functional Diagnosis

Investigations Required

It is certified that Robina who mustaq is 15 wks pregnancy she is c/o Plv bleed + Menstr she is for 30 days sick leave for 15/9/07 signed.

Gynecologist  
Mardan Medical Complex  
Teaching Hospital Mardan  
15-9-07

Through Proper Channel

(11)

To,  
The District Health Officer,  
Mardan.

From  
Robina Mushtaq LHW  
BHU Khazana Dheri Mardan.

Subject:- Application for Maternity leave.

Respected Sir,  
It is to state in your honour that I am suffering from maternity problem, as I am unable to attend my BHU, therefore, grant me maternity leave from ~~23-01-2018~~ to 18-04-2018. I shall be thank full for this kindness. Clinical report is hereby attached with.

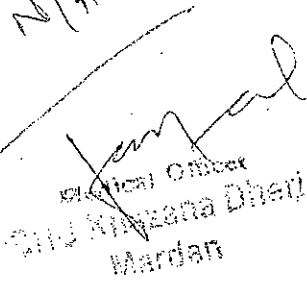
Thanks

Yours sincerely,



Robina Mushtaq  
LHW, BHU, Khazana Dheri,  
Mardan.

*forwarded  
to DHO, Mardan  
for N/A.*

  
District Officer  
BHU Khazana Dheri  
Mardan



RS. 5.00  
You are Associate member  
of the Society for one year

# DOMICILE CERTIFICATE

12

I declare that i was born of parents who are permanently domiciled in N.W.F.P. Having belonged to it by birth / settled in it.

I belong by birth to village / Mohallah Faqir Kili

Tehsil Mardan District Mardan

Robina Bibi

Signature of applicant

Date: 11-2-2004

Pursuance to the declaration dated \_\_\_\_\_

Filed by Robina Bibi S/D/ W/ of Mushtaq Ali

of village Faqir Kili Mohallah Khawaja Rashaka

domiciled in N.W.F.P. It is, hereby certified that the said Robina Bibi is born of parents who are permanent residents of the N.W.F.P. Having belonged to it by birth / settled in it.

I have satisfied myself from personal/ my own knowledge / verification that the above declaration is true and certify.

This Feb date of 12 12004

Robina

COUNTERSIGNED

DISTRICT OFFICE  
DISTRICT REVENUE OFFICER  
MARDAN

No. 3422

DEPUTY DISTRICT REVENUE OFFICER

Date: 12-2-04

تصدیق کی جاتی ہے کہ سہمی اسماءہ ..... روبینہ بی بی ..... ولدہ دختر ازوجہ مشتاق علی

ساکن محلہ خواجہ رشید مردان ..... گاؤں اشہر فقیر علی نعتہ روڈ مردان ضلع مردان ..... کا اکی رہائشی

پیدائشی باشندہ ہے اور اس کے والدین اشوہر بھی علاقہ مذکورہ کے رہائشی و پیدائشی باشندگان ہیں۔

اور ایک اچھے پاکستانی ہیں

**M. NABI**  
Member Council  
C-28 Mahr Dhar  
Muzaffargarh

میں ان کو ذاتی طور پر جانتا ہوں۔ رپورٹ عرض ہے۔

**جناب عالی!**

حسب تصدیق

سہمی اسماءہ ..... روبینہ بی بی ..... پسر دختر ازوجہ مشتاق علی

بمعد والدین موضع فقیر علی ..... تحصیل مردان ضلع مردان

**Khurshid Khan**  
NAZIM  
C-28 Mahr Dhar

صوبہ سرحد کے پیدائشی ہیں۔ رپورٹ عرض ہے۔

8276

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



## PESHAWAR

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
Session 2002 (Annual)

Name: Robina Bibi

Father's Name: Abdul Wahid

Roll No 7055

| Subject             | Marks | MARKS OBTAINED |           |       |              |
|---------------------|-------|----------------|-----------|-------|--------------|
|                     |       | Theory         | Practical | Total | In Words     |
| 1. English          | 150   | -              | -         | 63    | Sixty-Three  |
| 2. Urdu             | 150   | -              | -         | 93    | Ninety-Three |
| 3. Islamiyat (Comp) | 75    | 41             | -         | 41    | Forty-One    |
| 4. Pakistan Studies | 75    | 32             | -         | 32    | Thirty-Two   |
| 5. New Rizai        | 100   | 57             | -         | 57    | Fifty-Seven  |
| 6. G. Science       | 100   | 60             | -         | 60    | Sixty Only   |
| 7. Islamic Studies  | 100   | 59             | -         | 59    | Fifty-Nine   |
| 8. Pushto           | 100   | 60             | -         | 60    | Sixty-Only   |

Total 850

465-C

Four Hundred Sixty-Five Only

Remarks

IS,PA.

Checked By: \_\_\_\_\_

Date: 28-06-2002

Note: Error / Omission etc. excepted.

Khasar and BRAINS Software Enterprise (KBSOIT)

*Pam*  
Controller of Examinations

GOVT. GIRLS HIGH SCHOOL No. 1 MARDAN



(14)

PROVISIONAL CERTIFICATE  
SECONDARY SCHOOL CERTIFICATE EXAMINATION  
ANNUAL / SUPPLEMENTARY  
SESSION 2002

Roll No. 7655 Admission No. 13103

This is to certify that Miss Robina Bibi  
daughter of Mr. Abdul Wahid

has passed Secondary School Certificate Examination from the  
Board of Intermediate & Secondary Education, Peshawar held in  
March 2002 Annual/Supplementary  
as a regular student of this School.

Date of Birth (In figure) 15-02-1986

(In Words) Fifteen Feb: N.H. Eighty Six

**Subjects Passed**

1. English 2. Urdu 3. Islamiat/Comp: 4. Pak Study 5. Mathematics  
6. Physics/Home-Economics 7. Chemistry/Pushto 8. Biology/Islamic Studies

Marks Obtained 465 Grade B

Conduct Good Games Good

Prepared by HL Checked by BS

Enrolment Number 254 - B/GGM-1-2000

Principal

Govt : Girls High School No. 1  
Mardan

Note: This certificate enables the student to be admitted in a college but does not replace one to be given to her by the B.I.S.E. Peshawar





# لیڈی ہیلتھ ورکرز پروگرام برائے بنیادی صحت خیبر پختونخوا

## ماہانہ رپورٹ برائے لیڈی ہیلتھ ورکر

16



35/10/17

اپریل 2017 تا ستمبر 2017

| لیڈی ہیلتھ ورکر                             |     | اپریل       |     | مئی  |     | جون  |     | جولائی |     | اگست |     | ستمبر |     |
|---|-----|-------------|-----|------|-----|------|-----|--------|-----|------|-----|-------|-----|
| نمبر  | نوع | نمبر        | نوع | نمبر | نوع | نمبر | نوع | نمبر   | نوع | نمبر | نوع | نمبر  | نوع |
| 1۔ بنیادی معلومات                           |     |             |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کا نام                      |     | 35/10/17-07 |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کا پتہ                      |     | 1336        |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی عمر                      |     | 5           |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی تعلیم                    |     | 5           |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی صحت                      |     | 92          |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی دیگر معلومات             |     |             |     |      |     |      |     |        |     |      |     |       |     |
| 2۔ صحت کی حالت                              |     |             |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی صحت                      |     | 5           |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی دیگر صحت کی حالت         |     |             |     |      |     |      |     |        |     |      |     |       |     |
| 3۔ سہولتوں اور ایلیٹ                        |     |             |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی سہولت                    |     | 5           |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی دیگر سہولتوں اور ایلیٹ   |     |             |     |      |     |      |     |        |     |      |     |       |     |
| 4۔ لیڈی ہیلتھ ورکر کی کٹ                    |     |             |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی کٹ                       |     | 2           |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی دیگر کٹ                  |     |             |     |      |     |      |     |        |     |      |     |       |     |
| 5۔ خاندانی منصوبہ بندی                      |     |             |     |      |     |      |     |        |     |      |     |       |     |
| خاندانی منصوبہ بندی                         |     | 5           |     |      |     |      |     |        |     |      |     |       |     |
| لیڈی ہیلتھ ورکر کی دیگر خاندانی منصوبہ بندی |     |             |     |      |     |      |     |        |     |      |     |       |     |

*Amjad Ali*  
ADVOCATE

SUPREME COURT

-D-17 br

(Signature)











بخدمت جناب ڈسٹرکٹ ہیلتھ آفیسر ضلع مردان

(Ex-Pakistan Leave)

درخواست بمردان

جناب عالی!

مودبانہ گزارش ہے۔ کہ سالکہ عمرہ کی سعادت حاصل کرنے کا خواہشمند ہے۔ لہذا آپ صاحبان مہربانی کر کے سالکہ کو

26-02-2019 تا 07-02-2019 کو (Ex-Pakistan Leave) پر جانے کی رخصت عطا فرمائیں۔

تین نوازش ہوگی۔

العارضہ

آپ کی مخلص روینہ مشتاق LHW

BHU خزانہ ڈھیری مردان

مورخہ۔۔۔ 22-02-2019

Recommended and forwarded to District Health Officer

District Mardan for Necessay action please.

District Officer  
BHU Khazana Dheri  
Mardan

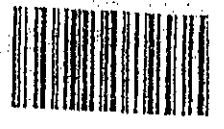
Amjad Ali  
ADVOCATE  
SUPREME COURT

*Amjad Ali*  
ADVOCATE  
SUPREME COURT

*[Signature]*  
(22)

Airblue Limited **E-TICKET** Booking Reference TLMJAM

**airblue** Booked By: Rehman Holidays CR-ISB  
Contact: Suleman Shah (Main Branch)  
111786785



Reserved On: 25-Dec-2018 10:25 AM Ticketed On: 26-Dec-2018 6:11 PM

**Travellers**

| Name:                          | Ticket:          | Contact:       | Passport: | Outbound: | Return:  |
|--------------------------------|------------------|----------------|-----------|-----------|----------|
| MR MUSHTAQ ALI                 | 084 2307 083 884 | +92 3114876682 | FK1829741 | 3B        | 3B       |
| MUHAMMAD ABDULLAH (16p infant) | 084 2307 083 886 |                | KS1071911 | Any seat  | Any seat |
| <b>MRS ROBINA BIBI</b>         | 084 2307 083 885 |                | GD3113301 | 3A        | 3A       |

**Travel Itinerary**

**Peshawar to Jeddah**

**NOTICE:**  
Check-in counters close 45 min before scheduled departure time for domestic and 90 minutes before scheduled departure time for international flights. Oversized bags will be charged an additional fee of DHS 200 or SAR 200.

| Date               | Times   | Flight Info                                  | Flight Number     | Notes |
|--------------------|---------|--|-------------------|-------|
| Thursday<br>07-Feb | 6:10 PM | Depart Peshawar (PEW)<br>Arrive Jeddah (JED) | PA-670<br>Economy | A321  |

**Jeddah to Peshawar**

**NOTICE:**  
Check-in counters close 45 min before scheduled departure time for domestic and 90 minutes before scheduled departure time for international flights. Oversized bags will be charged an additional fee of DHS 200 or SAR 200.

| Date              | Times   | Flight Info                                  | Flight Number     | Notes |
|-------------------|---------|--|-------------------|-------|
| Tuesday<br>26-Feb | 1:00 PM | Depart Jeddah (JED)<br>Arrive Peshawar (PEW) | PA-671<br>Economy | A321  |

**Ticket Details**

| Traveller Name<br>Ticket / Coupon | Flight No            | Route          | Date        | Fare Type          | Baggage Allowance | Fare Basis | Status |
|-----------------------------------|----------------------|----------------|-------------|--------------------|-------------------|------------|--------|
| MR MUSHTAQ ALI                    | 084 2307 083 884 / 1 | PA-670 PEW-JED | 07 Feb 2019 | Discount (No Bags) | -                 | EDTARTX    | OK     |
|                                   | 084 2307 083 884 / 2 | PA-671 JED-PEW | 26 Feb 2019 | Standard (1 Bag)   | 1 pc              | ESTARTL    | OK     |
| <b>MRS ROBINA BIBI</b>            | 084 2307 083 885 / 1 | PA-670 PEW-JED | 07 Feb 2019 | Discount (No Bags) | -                 | EDTARTX    | OK     |
|                                   | 084 2307 083 885 / 2 | PA-671 JED-PEW | 26 Feb 2019 | Standard (1 Bag)   | 1 pc              | ESTARTL    | OK     |
| MUHAMMAD ABDULLAH                 | 084 2307 083 886 / 1 | PA-670 PEW-JED | 07 Feb 2019 | Discount (No Bags) | -                 | EDTARTX    | OK     |
|                                   | 084 2307 083 886 / 2 | PA-671 JED-PEW | 26 Feb 2019 | Standard (1 Bag)   | -                 | ESTARTL    | OK     |

*Attest*  
*Shah*  
Suleman Shah  
111786785  
Mardan



**INSAF TRAVEL AGENCY**

OFFICE#(A)25,26 ,OPPOSITE ETIMAD SUADI CENTER HAJI GUL  
PLAZAMILS BY PAS ROAD MARDAN  
0092-300-5731718

Saudi Company: AL MASSA

MATCHLESS

MAKKAH

23

*Amjad Ali*  
ADVOCATE  
SUPREME COURT

الماسة الحديثة  
للخدمات السياحية

Voucher No.236 Service No: REF,NO.14132

Date Created:17 Jan 2019



General Information About Service

|             |             |    |
|-------------|-------------|----|
| 07 Feb 2019 | 26 Feb 2019 | 19 |
|-------------|-------------|----|

KSA Arrival Information

| Origin         | Flight No      | Arrival Date | Arrival Time | Destination | Departure Date | Departure Time | Agency |
|----------------|----------------|--------------|--------------|-------------|----------------|----------------|--------|
| Jeddah Airport | PEW-JED PA-670 | 07 Feb 19    | 14:10 PM     |             | 07 Feb 19      | 18:10 PM       | TLMJAM |

Departure Information

| Origin         | Flight No      | Departure Date | Departure Time | Destination | Agency |
|----------------|----------------|----------------|----------------|-------------|--------|
| Jeddah Airport | JED-PEW PA-671 | 26 Feb 19      | 05:50 AM       |             | SAME   |

Accommodation Detail

| Category | Location | Hotel Name              | Check In Date | Check Out Date | Nights | Room Type |
|----------|----------|-------------------------|---------------|----------------|--------|-----------|
| ALL      | MAKKAH   | BURJ SHARIYA OR EQUAL   | 07 Feb 19     | 13 Feb 19      | 6      | Sharing   |
| ALL      | MADINA   | WADYAR AL MADINA /EQUAL | 13 Feb 19     | 21 Feb 19      | 8      | Sharing   |
| ALL      | MAKKAH   | BURJ SHARIYA OR EQUAL   | 21 Feb 19     | 26 Feb 19      | 5      | Sharing   |

Transportation Detail

|                     |     |      |
|---------------------|-----|------|
| JED-MAK-MED-MAK-JED | BUS | None |
|---------------------|-----|------|

Mutamer's (Pilgrims) Detail

| PILGRIM NAME      | PASSPORT NO | DOB       | AGE GROUP | Child/Without Bed | Alien No | Passport No |
|-------------------|-------------|-----------|-----------|-------------------|----------|-------------|
| MUSHTAQ ALI       | FK1829741   | 03 Apr 80 | adult     |                   | 12345    | 14/01/2019  |
| MUHAMMAD ABDULLAH | KS1071911   | 15 Feb 18 | infant    | Child/Without Bed | 12345    | 14/01/2019  |
| ROBINA BIBI       | GD3113301   | 15 Feb 86 | adult     |                   | 12345    | 14/01/2019  |

General Office  
Saud Almazana Dheh  
Jeddah



etimad

For Saudi Arabia

شركة في اف اس تسمييل الدولية  
مركز خدمات المسافرين المملكة العربية السعودية

Appointment Letter

خطاب للموعد

Appointment Reference Number



PKMR9936UR

95

|   |       |   |             |
|---|-------|---|-------------|
| وقت الموعد<br>Appointment Time                    | 14:30 | التاريخ للموعد<br>Appointment Date      | 11-Jan-2019 |
| Entry allowed only 15 min before appointment time |       | يجب الحضور قبل الموعد المحدد ب 15 دقيقة |             |

عنوان مركز خدمات المشيرة

Visa Service Center Address

Haji Gul Plaza Mill Road Near Taroon Shadi Hall Shop no. 11-12-13 A Block Mardan

| فئة الموعد<br>Appointment Category | نوع الموعد<br>Appointment Type | عدد المتقدمين<br>No. of Applicants | الغرض من السفر<br>Purpose of Travel |
|------------------------------------|--------------------------------|------------------------------------|-------------------------------------|
|------------------------------------|--------------------------------|------------------------------------|-------------------------------------|



الخدمة العادية  
Normal

عائلة  
Family

2

Umrah

The Applicant details are listed below بيانات العميل موضحة ادناه

| S.No<br>رقم التسلسل | Full Name<br>الاسم بالكامل | Passport Expiry Date<br>تاريخ انتهاء جواز السفر |
|---------------------|----------------------------|---|
| 1                   | MUSHTAQ ALI                | 05-Dec-2023                                     |
| 2                   | ROBINA BIBI                | 04-Dec-2023                                     |

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all visa and  
travel requirements

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- Visa
- Holidays
- Cars
- Intl. Driving License
- Telecom and much more...



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*Amjad Ali*  
ADVOCATE  
SUPREME COURT

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شركة في اف اس تسهيل الدولية  
مركز خدمات المسافرين للمملكة العربية السعودية

Applicant with below 6 age above 80 exempt are not required to visit VSC to complete biometric  
The consolidated amount to be paid at the Visa Service Center is displayed below

المبلغ الكلي الذي سيتم دفعه في مركز خدمة لتشييرة مرسوم أدناه

| Name<br>الاسم     | Unit Fee (PKR)<br>رسوم الفئة ( درهم<br>اماراتي ) | No. of Applicants<br>عدد العملاء | Amount (PKR)<br>الرسوم بالدرهم<br>الاماراتي |
|-------------------|--|----------------------------------|---|
| Online Bio Normal | 1028.00  | 2                                | 2056.00                                     |
| Sales Tax         | 10.00 % for Online<br>Bio Normal                 | 2                                | 205.60                                      |
| Total             |  |                                  | 2,261.60                                    |
| To Be Paid        |  |                                  | 2,261.60                                    |

تعليمات:

- If granted the visa I shall abide by all the laws and regulations of the Kingdom of Saudi Arabia and respect the Islamic customs and traditions of its people  
عند منح فتاكييرة أقر بان ألتزم بجميع قوانين وأنظمة المملكة العربية السعودية واحترام العادات والتقاليد الإسلامية لشعبها
- I am also fully aware that the crime of smuggling narcotics and other illegal drugs into the Kingdom of Saudi Arabia is punishable by the death penalty  
كما أنني أدرك تماماً ان جريمة تهريب المخدرات وغيرها من المواد الغير مشروعة في المملكة العربية السعودية يعاقب عليها بعقوبة الإعدام
- I have never been removed, excluded or deported from the Kingdom of Saudi Arabia or from any other Gulf Cooperation Council member state or charged with violation of any law or regulation thereof.  
لم يتم فصلاني، استبعادى أو ترحيلى من المملكة العربية السعودية أو من أي دولة اخرى عضو في مجلس فتاكون الخليجي ولم اكن من المعتهمين بانتهاك أي قانون أو لائحة منه
- I am aware that all alcoholic beverages, narcotics and other illegal drugs, pornographic materials or publications, which violate the social norms of decency and all other publications, which are disrespectful of any religious belief or political orientation, are prohibited and shall not be brought into the Kingdom of Saudi Arabia  
واننى على علم بان جميع المشروبات الكحولية والمخدرات وغيرها من المخدرات غير المشروعة، والمواد الاباحية أو المنشورات، التي تنتهك المعايير الاجتماعية للأخلاق وتحظر جميع المنشورات الأخرى التي لا تحترم أي معتقد ديني أو توجه سياسي، هي ممنوعة تماماً ولا يجوز إحضارها إلى المملكة العربية السعودية

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- Visa
- Holidays
- Cars
- Intl. Driving License
- Telecom
- and much more..

Amjad Ali  
ADVOCATE  
SUPREME COURT





کرم صحت خیرہ ماردان

**DISTRICT HEALTH DEPARTMENT- MARDAN**  
**DISTRICT HEALTH OFFICER MARDAN**  
**(KHYBER PAKHTUNKHWA)**  
PH: # (0937) 9230030 Fax: # (0937) 9230349  
[dhodho@paf.gov.pk](mailto:dhodho@paf.gov.pk)

(27)

No. 1246-76/DHO Dated: 19/09/2017

To


- |                                       |                                      |
|---------------------------------------|--------------------------------------|
| 1. Nasreen Parveen LHW, CD Daga Piran | 2. Rehana Yameen LHW, CD Daga Piran  |
| 3. Nageen LHW, CD Daga Piran          | 4. Aliq LHW, BHU Sari Behlol         |
| 5. Nargis LHW, BHU Gujar Garhi        | 6. Zaheen LHW, BHU Gujar Garhi       |
| 7. Shahbaz LHW, BHU Gujar Garhi       | 8. Saman LHW, BHU Gujar Garhi        |
| 9. Shahida LHW, BHU Gujar Garhi       | 10. Saleema LHW, BHU Gujar Garhi     |
| 11. Yasmeen LHW, BHU Gujar Garhi      | 12. Iram Naz LHW, BHU Khaszana Dheri |
| 13. Robina LHW, BHU Khaszana Dheri    | 14. Shahcen LHW, BHU Khaszana Dheri  |
| 15. Hameeda LHW BHU Qasam             |                                      |

Subject: Explanation/Pay Stop

Memo,

It has been reported by the M/O Incharge (UPEC Chairman) of your health facilities that you refused to perform your duties during the NIDs (18-21, September 2017).

It is to inform you that your salaries has been stopped immediately and furthermore you are directed to explain your position within 07 days of the receipt of this letter failing which strict disciplinary action will be initiated against you as per rules.

  
District Health Officer  
Mardan

No. \_\_\_\_\_ DHO

Copy forwarded to the:

1. Deputy Commissioner Mardan
2. District Coordinator LHWs Program Mardan.
3. Accountant DHO Office Mardan to stop the pay of the above mentioned LHWs immediately.
4. Office copy.

District Health Officer  
Mardan

خدمتِ خراب ڈسٹرکٹ ہیلتھ آفسر صاحبہ فیض مہراں

درخواست برائے معافیہ روینڈہ مشتاق لڑی ہیلتھ ورڈر (Pay Release)

جناب عالی!

گزارش عرض ذیل ہے کہ میں پوپو ڈیوی سہراہا کے سے قاصدنی اور میں نے میڈیکل  
ہی ہوزیا تھا کہیں BHU (M/O) قرانہ ڈھیری کی عدا کو جو وہی کی بنا پر میں میڈیکل  
پوپوہم سے پے ڈسٹرکٹ ہیلتھ آفس میں جے کرانہ میں اور میں میڈیکل 18.09.2017  
کو جے روایا۔ جس کے سبب میں صبری (Pay stop) کر دی گئی  
لہذا آپ صاحبہ سے اپنا سہ کے صبری تمناہ کو (Release) کروائیں اور میرے  
میڈیکل کو قتلوار کے پوپوہم سے مشتاق لڑی فرادیا جانے  
سائلہ عمر خیر دیا ہو پے گی

الحامد

20.09.2017

صوبہ

RD

آپ کا تعلق روینڈہ مشتاق لڑی ہیلتھ ورڈر BHU قرانہ ڈھیری

فقیر زیادہ ادب

Forwarded to  
DHO, Mardan  
for N/A

for  
Medical Officer  
BHU, Mardan  
Mardan

25-9-2017

کریمنٹ جناب ڈسٹرکٹ ہیلتھ آفیسر ضلع مردان

ذرا وقت برائے دادرسی منتقلی ڈیوٹی پر موجود ہیں سماجی روہینہ مشتاق لیڈی ہیلتھ ورکر

(29)

جناب عالی

موردانہ گزشتہ سببوں میں غرض ہے۔

یہ کہ سماجی روہینہ مشتاق لیڈی ہیلتھ ورکر BHU فنوائز ڈھیری سائی گاڈی فیکٹری

غور پر مشتمل رہائش پذیر ہیں۔

یہ کہ من مسائل خدمت میں بحیثیت لیڈی ہیلتھ ورکر تعینات ہیں۔ یہ کہ من مسائل

حاملہ ہیں اور یہ کہ مسائل مسلسل مددنا ڈراپ ہیں۔ اور یہ کہ مسائل کے اس سے

بیلد ہی وقت عمل بنانے ہو چکے۔ اور یہ کہ ڈیوٹی کے دوران سخت تکلیف

پہنچتی ہے۔ اور یہ کہ لیڈی ڈاکٹر کے آراؤنڈ کا مشورہ دیا ہے۔

میں سے رپورٹ ذرا وقت میں کو مفید ہے۔

گھڑائی عرصہ میں سے اناس ہے۔ کہ مسائل کو ڈیوٹی سے منتقلی قرار دیا جائے

مسئلہ عمر بھر دیا جائے گا۔

آپنی تبادرہ روہینہ مشتاق لیڈی ہیلتھ ورکر BHU فنوائز ڈھیری

فوق زیادہ آداب

تاریخ: 15-09-2017

Handwritten signature

Coord. BPT  
Management Forwarded

Medical Officer  
BHU Khazana Dheri  
Mardan

to DHO for N/A

1919/112

Handwritten signature

محمد رفیق جناب ڈسٹرکٹ ملٹی ایفیر صاحب ضلع مردان

30

درخواست برائے معائنہ روایتہ مشتاق لہڑی بیٹو اور برائے (Pay Release)

جناب عالی!

گزارش عرض ہے کہ (Maternity Problem) کی وجہ سے میں پولو ڈروئی  
بھرا بنا کر دیے سے جا سکتی۔ جس کی وجہ سے گزشتہ 07 ماہ سے معری  
تختواہ بند ہے۔ اس دوران میں 15-09-2017 کو اس ماہ کیلئے میڈیکل اور  
عھئی کی درخواست جمع کران۔ اس کے بعد 17-01-2018 سے 02-03-2018  
تک (Maternity leave) اور اس کے 23-02-18 سے لیکر  
18-04-2018 تک عزیز 45 دن (Maternity leave) کیلئے عھئی کی درخواست  
اور میڈیکل جمع کروایا۔

اب کے جناب عالی میں پولو ڈروئی اور منیڈ ورک میں ٹاک کر کے قابل ہوں۔  
اس وجہ سے آپ صاحبان سے التماس ہے کہ معری تختواہ (Active) کر دیا  
اور ساتھ ہی گزشتہ معائنہ معینوں کی تباہی بھی (Release) کر دیا  
معاذ اللہ عمر عمر دیا و بیٹی

نوٹ! عھئی کیلئے میڈیکل اور درخواستی تصدیق میں

الغرض

مورخہ: 14-05-2018

(R)

اپنی تاجدارہ روایتہ مشتاق لہڑی بیٹو اور برائے تختواہ معری

Forward  
to  
DHO for  
W/O  
I am

حکومت پاکستان

نیشنل ڈیٹا بیس اینڈ رجسٹریشن اتھارٹی (وزارت داخلہ)  
 اٹھارہ سال سے کم عمر بچوں کا سرٹیفکیٹ \*

31

CRC No: 14271201

16101-1126974-7

درخواست دہندہ کا شناختی کارڈ نمبر:

مشاق علی

درخواست دہندہ کا نام

| سری نمبر | بچے کا نام اور رجسٹریشن نمبر   | والد کا نام اور شناختی کارڈ نمبر | والدہ کا نام اور شناختی کارڈ نمبر | جنس / رشتہ | پیدائش کا قطعہ نمبر / تاریخ پیدائش | معدودی    |
|----------|--------------------------------|----------------------------------|-----------------------------------|------------|------------------------------------|-----------|
| 1        | محمد طفیل<br>16101-3451486-1   | مشاق علی<br>16101-1126974-7      | روسیا بی بی<br>16101-0768330-4    | لڑکی       | مردان، مردان<br>2006-03-25         | کوئی نہیں |
| 2        | سعد بی بی<br>16101-9769820-8   | مشاق علی<br>16101-1126974-7      | روسیا بی بی<br>16101-0768330-4    | لڑکی       | مردان، مردان<br>2008-06-28         | کوئی نہیں |
| 3        | محمد عیسیٰ<br>16101-2951096-3  | مشاق علی<br>16101-1126974-7      | روسیا بی بی<br>16101-0768330-4    | لڑکا       | مردان، مردان<br>2011-03-25         | کوئی نہیں |
| 4        | محمد عروانہ<br>16101-2951191-3 | مشاق علی<br>16101-1126974-7      | روسیا بی بی<br>16101-0768330-4    | لڑکا       | مردان، مردان<br>2018-02-15         | کوئی نہیں |

- 1- اس فیملی کے مندرجہ بالا اٹھارہ سال سے کم عمر 4 بچے ایجن کا اندراج مہار سے ریکارڈ میں موجود ہے۔
- 2- درج شدہ بچے کی عمر اٹھارہ سال ہوئے ہی شناختی کارڈ کے حصول کیلئے درخواست جمع کروائیں۔
- 3- اس سرٹیفکیٹ کو مستحکم کر رکھیں کیونکہ بچوں کے اٹھارہ سال کی عمر کو پہنچنے پر اسی سرڈن کے حوالے سے شناختی کارڈ سازی کے نام ہیں۔
- 4- ذرا آئندہ بچے کا قومی طور پر اندراج کروائیں اور سارے رجسٹریشن سرٹیفکیٹ حاصل کریں۔
- 5- کوآف کی تبدیلی کی صورت میں نیار رجسٹریشن سرٹیفکیٹ حاصل کریں۔

Attested

(Signature)

Hayat Khan  
SCT GHS Bakri Banda  
Mardan



عثمان یوسف مبین

دستخط رجسٹرار جنرل

تاریخ اجراء: 2018-11-20

نسر روڈ، قلعہ، ڈاک خانہ، حوالہ، مردان





علاقہ صحت خیبر پختونخوا

**DISTRICT HEALTH OFFICER  
MARDAN (Khyber Pakhtunkhwa)**

Ph: # (0937) 9230030 Fax: # (0937) 9230283  
Email: [mardandho@gmail.com](mailto:mardandho@gmail.com)

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All communications should be addressed to the District Health Officer Mardan and not to any official by name

No. 4607 /DHO Dated: 12/03/2019

Robina Mushtaq LHW.  
BHU Khazana Dheri

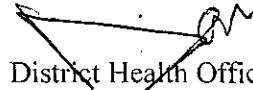
Subject: **Personal Hearing**

Memo,

It has been reported by Lady Health Supervisor BHU Khazana Dheri that, you did not perform your duties in Polio Campaign. Your pay has been already stopped in September 2017 due to not performing your duties in Polio Campaign.

Subsequently explanations and warnings have been issued to you vide letter No. 1765-67/NP dated 14/09/2006, letter No. 6002-3/NP dated 09/05/2007, letter No. 2500-2/NP dated 12/12/2007, letter No. 882/NP dated 30/12/2008, letter No. 205/NP dated 19/03/2008 (warning), letters No. 534 & 550/NP dated 26/08/2009, letter No. 629/NP dated 23/10/2009(warning), letter No. 396/NP dated 30/08/2010, letter No. 39/NP dated 20/02/2013, letter No. 88/NP dated 14/03/2013, letter No. 326/NP dated 23/12/2014 and Show Cause Notice was issued vide letter No. 17249/DHO dated 20/12/2016.

You are hereby directed to attend the office of undersigned on 18/03/2019 for personal hearing to proceed further.

  
District Health Officer  
Mardan

No. \_\_\_\_\_ DHO


Copy forwarded to the:

1. Provincial Coordinator, DD Technical LHWs Program KPK Peshawar.
2. District Coordinator LHWs Program Mardan
3. Office copy

District Health Officer  
Mardan

**Dist. Govt. NWFP-Provincial**  
**District Accounts Office Mardan**  
**Monthly Salary Statement (December-2016)**

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**Personal Information of Mr ROBENA BIBI d/w/s of ABDUL WAHID**

Personnel Number: 00795781 CNIC: 1610107683304 NTN:  
 Date of Birth: 15.02.1986 Entry into Govt. Service: 01.07.2012 Length of Service: 04 Years 06 Months 001 Days

**Employment Category: Active Permanent**

Designation: LADY HEALTH WORKER 80003407-DISTRICT GOVERNMENT KHYBE  
 DDO Code: MR6169-E.D.O HEALTH (ADMN) MARDAN  
 Payroll Section: 002 GPF Section: 002 Cash Center:  
 GPF A/C No: Interest Applied: No GPF Balance: 2,235.00  
 Vendor Number: -  
**Pay and Allowances:** Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 05 Pay Stage: 4

| Wage type |                           | Amount    | Wage type |                           | Amount   |
|-----------|---------------------------|-----------|-----------|---------------------------|----------|
| 0001      | Basic Pay                 | 10,270.00 | 1000      | House Rent Allowance      | 1,002.00 |
| 1300      | Medical Allowance         | 1,500.00  | 1973      | Adhoc Allowance 2010@ 50% | 1,670.00 |
| 2148      | 15% Adhoc Relief All-2013 | 296.00    | 2199      | Adhoc Relief Allow @10%   | 200.00   |
| 2211      | Adhoc Relief All 2016 10% | 1,027.00  |           |                           | 0.00     |

**Deductions - General**

| Wage type |                           | Amount  | Wage type |                 | Amount  |
|-----------|---------------------------|---------|-----------|-----------------|---------|
| 3005      | GPF Subscription - Rs 745 | -745.00 | 3501      | Benevolent Fund | -180.00 |
| 4004      | R. Benefits & Death Comp: | -450.00 |           |                 | 0.00    |

**Deductions - Loans and Advances**

| Loan | Description | Principal amount | Deduction | Balance |
|------|-------------|------------------|-----------|---------|
|      |             |                  |           |         |

**Deductions - Income Tax**

Payable: 0.00 Recovered till December-2016: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 15,965.00 Deductions: (Rs.): -1,375.00 Net Pay: (Rs.): 14,590.00**

Payee Name: ROBENA BIBI  
 Account Number:  
 Bank Details: , ,

Leaves: Opening Balance: Aailed: Earned: Balance:

**Permanent Address:**

City: MARDAN Domicile: - Housing Status: No Official  
 Temp. Address:  
 City: Email: robinamushtaq86@gmail.com