

Execution Petition 365/2019

27th Oct 2022

1. None for the petitioner present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Muhammad Naeem, Assistant Director and Mr. Sadam Hussain, Legal Advisor for respondent No.4 present.

2. An application for placing on file some documents and for release of salary has been filed by Dr. Farukh Jameel, Hospital Director (respondent No.4) with the submission that respondent No.4 has already performed his part to implement the judgment while only LPC was awaited on the part of respondent No.6, which was sought to be directed to be produced. Salary of respondent No.4 is released and respondent No.6 is directed to produce the record on 24.11.2022 before S.B at camp court D.I.Khan. Neither the petitioner nor his counsel is present. Notices be issued to the petitioner and his counsel for further proceedings.



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

28th Sept, 2022

Learned counsel for the petitioner present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

It is noted with concerned that no proper representation is made by the respondent department before the Tribunal in violation of the standing orders of the Establishment Department. Despite clear directions given on the previous date, respondents have not submitted implementation report. This Tribunal has no other alternative but to take action against respondents. The Accountant General Khyber Pakhtunkhwa and District Accounts Officer, D.I.Khan are directed to attach salaries of the respondents No. 1 to 4 till further orders by this Tribunal and compliance report be submitted to the Registrar of this Tribunal. Show cause notice be also issued to the respondents as to why they should not be proceeded under the Contempt of Court Ordinance 2003. Respondents are directed to appear in person alongwith the implementation report.

To come up on ⁹24.10.2022 for further proceedings at camp court D.I.Khan.

(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

EP 365/2019

1st June, 2022

Counsel for the petitioner present. Nobody is present on behalf of the respondents nor any Law Officer is present.

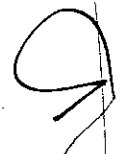
Notices be issued to the respondents to appear in person alongwith compliance report on 28.06.2022 before S.B at Camp Court, D.I.Khan.


Chairman

28th June 2022

Learned counsel for the petitioner present. Muhammad Adeel Butt, Adll: AG alongwith Mr. Muhammad Jamshaid, Chief Clinical technician for respondents present.

Learned AAG seeks time to submit proper implementation report. Last opportunity is granted for submission of implementation report. To come up for implementation report on 26.07.2022 before S.B at camp court D.I.Khan.


(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

23.11.2021

None for the petitioner present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Hasher, Sr. Auditor for respondents present.

Notices be issued to the petitioner and his counsel. Adjourned. To come up for further proceedings on 20.01.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

20.01.2022

Clerk of learned counsel for the petitioner present. Muhammad Adeel Butt, Addl: AG for respondents present.

Due to general strike of the bar, the case is adjourned. To come up for further proceedings on 08.03.2022 before S.B.


(Mian Muhammad)
Member(E)

08.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 01.06.2022 for the same as before.


Reader.

EP 365/2019

17.08.2021 Counsel for the petitioner and Mr. Muhammad Adeel Butt, Addl. AG alongwith Ziaullah, D.S (Litigation) for the respondents present.

Compliance report has not been submitted. Respondents are once again directed for hot pursuit of the case of petitioner by fully preparing the pension case of petitioner for onward submission to the District Accounts Office, so that he is enabled to receive pensionary benefits allowed to him by this Tribunal. To come up for compliance report on 21.10.2021 before S.B.


Chairman

21.10.2021. Nemo for the petitioner. Mr. Muhammad Adeel Butt, Addl. AG alongwith Safiullah, Focal Person for the respondents present.

Representative of the Health Department has informed that despite pursuing the matter, the necessary feedback from the respondent No. 4 now substituted by Hospital Director of the concerned Hospital is still awaited and in absence of his feedback, finalization of pension case of the petitioner is not possible. In view of the order dated 06.07.2021 followed by further order it has become expedient to have resort to the coercive measures. It is directed that official vehicle in use of said respondent be seized by the District Police Officer, D.I.Khan and impounded in his office till further orders from this Tribunal. He i.e. DPO shall submit the report on or before next date. Copy of this order sheet be sent to the District Police Officer D.I.Khan for necessary action. Case to come up on 23.11.2021 before S.B.


Chairman

06.07.2021

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

Further verbosity in order sheets may not serve the purpose because the previous orders are full of strict directions but in vain. Let the respondents be simply directed for execution of the judgment in letter and spirit or face the consequences. Copy of this order sheet be sent to all concerned. Learned AAG shall also ensure on his part that this order has been received by the respondents and will get feedback of the progress towards implementation before or till next date. To come up for implementation report on 16.08.2021 before S.B.


Chairman

16.08.2021

Counsel for the petitioner and Mr. Asif Masood Ali Shah, DDA for the respondents present. No representative of the respondents is in attendance.

Learned DDA is directed to contact the respondents, requiring them to depute a well conversant officer to explain the progress they have made in pursuance of the directions so made for implementation of the judgment dated 29.06.2015 at credit of the petitioner. Case to come up on 17.08.2021 before S.B.


Chairman

EP 365/19

29.03.2021

Nemo for the petitioner. Addl. AG for the respondents present.

Vide order dated 27.01.2021, District Accounts Officer, D.I.Khan and Director MTI, DHQ Hospital D.I.Khan were summoned to attend the Tribunal personally. Record reveals that requisite notices were issued to them by the Registrar of the Tribunal vide letter dated 03.02.2021 but they remained unrepresented today. They are once against directed to attend the Tribunal personally on next date of hearing and explain the progress they have made in pursuance of the order so made for the pension case of the petitioner.

To come up for attendance of aforesaid officers and implementation report on 01.06.2021 before the S.B.



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

01.06.2021

Counsel for the petitioner and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Learned AAG seeks a cutoff time of 30 days for compliance of the judgment. Adjourned to 06.07.2021 before S.B.


Chairman

27.01.2021

Mr. Ashraf Ali Khattak, Advocate, for petitioner is present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Ziaullah, Law Officer, on behalf of respondent No. 2 and Mr. Saleem Javed, Litigation Officer, on behalf of respondent No. 3, are also present.

The learned Additional Advocate General submitted a letter bearing no. 9706 dated 21.07.2020 which has been addressed to the Section Officer Government of Khyber Pakhtunkhwa Health Department in connection with preparation of pension paper of petitioner and consequent disbursement of pension benefits to him in the last para of the referred to letter it has been stated that the District Accounts Officer D.I.Khan vide letter no. 1425 dated 14.02.2020 and subsequent letter no. 2353 dated 09.03.2020 has been dispatched for preparation of service history of Dr. Muzaffar Iqbal and LPC in his respect to proceed further in the matter which is still awaited and District Account Officer has kept mum over the matter. Another letter dated 06.10.2020 has been enclosed by making reference to this execution petition. No material action so far has been taken by the District Accounts Officer D.I.Khan. The respondents are directed to hecatically pursue the case of petitioner by fully preparing the pension of petitioner for onward submission to District Accounts Officer so that petitioner is enabled to receive pensionary benefits allowed by this Tribunal. For this ending view the District Accounts Officer D.I.Khan and the Director MTI are to be summoned for explaining progress they have made in pursuance of the order so made for the pension case of the petitioner. File to come up for attendance of aforesaid officials and implementation report on 29.03.2021 before S.B.

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

27.10.2020

Counsel for petitioner present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

As per order sheet dated 01.01.2020, respondents were given opportunity to do the needful and submit implementation report, failing which, defaulting officials shall be proceeded against in accordance with law, but till today, no implementation report has been submitted. As such, last chance is given to respondents to do the needful. To come up for further proceedings/implementation report/arguments on the point of maintainability of this petition, on 09.12.2020 before S.B. ✓


(Rozina Rehman)
Member (J)

09.12.2020

Nemo for petitioner. Addl. AG for respondents present.

No representative on behalf of the respondents is available so as the petitioner. Adjourned to 27.01.2021 for further proceedings before S.B.


Chairman

23.07.2020

Petitioner himself is present. Mr. Kabirullah Khattak, Additional AG alongwith representative of the department Mr. Hazrat Shah, Superintendent are also present.

The legal fraternity is observing strike today therefore, no proceedings could be conducted. The case is adjourned to 09.09.2020. To come up for previous proceedings before S.B.

(MUHAMMAD JAMAL KHAN)
MEMBER

09.09.2020

Arbab Saiful Kamal, Advocate on behalf of learned counsel for the appellant and Addl. AG alongwith Mukhtiar Ali, Asstt. Secretary for the respondents present.

A request for adjournment is made due to indisposition of learned counsel. Adjourned to 27.10.2020 before S.B.

Chairman



E.P No. 365/2019

12.02.2020

Mr. Usman Ghani, District Attorney for the respondents present. Reader of the Tribunal stated that the counsel for the petitioner appeared in the early hours. Implementation report on behalf of respondents not submitted. Learned District Attorney seeks further time. Case to come up for implementation report on 24.03.2020 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

24.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 15.06.2020 before S.B.


Reader

15.06.2020

None present on behalf of the petitioner. Notice be issued to petitioner and his counsel for attendance. Mr. Kabirullah Khattak, Additional AG for the respondents present. Respondents are also directed to direct the representative to attend the court and furnish implementation report on 23.07.2020 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

22.11.2019

Nemo for petitioner. Addl. AG for the respondents present.

Learned AAG requests for time to contact the respondents and obtain the implementation report.

Adjourned to 01.01.2020 before S.B.


Chairman

01.01.2020

Nemo for petitioner. Mr. Muhammad Riaz Khan Pindakhel, Asstt. AG alongwith Jaffar Shah, Senior Clerk for the respondents present.

The representative of respondents has provided copy of memo dated 12.02.2019 addressed to the Hospital Director MTI D.I.Khan and reminder dated 24.12.2019. A request for provision of some service record pertaining to the petitioner has been made in that memo.

Apparently the process has been set in motion about an year ago, however, has not been finalized as yet. The respondents are given an other opportunity to do the needful and submit the implementation report on next date of hearing. In case the requisite report is not provided the defaulting official(s) shall be proceeded against in accordance with law.

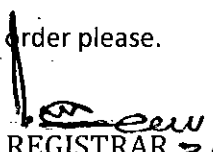


Adjourned to 12.02.2020 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Execution Petition No. 365 /2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	30.09.2019	<p>The execution petition of Dr. Muzaffar Iqbal submitted today by Mr. Ashraf Ali Khattak Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR 30/9/19</p>
2-	01/10/19.	<p>This execution petition be put up before S. Bench on <u>25/10/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
25.10.2019	S.B.	<p>Counsel for the petitioner present.</p> <p>Notices be issued to respondents for 22.11.2019 before</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Application No. 365 /2019

IN

Service Appeal No. 979/2013

Dr. Muzaffar Iqbal,
Ex- Senior Registrar (Ophthalmology),
DHQ Hospital, D.I. KhanApplicant / Petitioner

Versus

The Govt. of Khyber Pakhtunkhwa,
through Chief Secretary,
Civil Secretariat, Peshawar and others.....Respondents.

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Application.			1-4
2.	Copy of the Judgment of the Honourable Service Tribunal in appeal No.979/2013		A	5-6
3.	Copy of Notification, therein penalty of removal from service was converted into Compulsory Retirement.	11-03-2016	B	7
4.	Copies of pension papers submitted by respondent No.4 to respondent No.3			8-14
5.	Wakalat Nama			

Muzaffar Iqbal
Applicant/Appellant

Through

Ashraf Ali Khattak
Ashraf Ali Khattak
Advocate, High Court
9-B, Haroon Mansion,
Khyber Bazar, Peshawar.
Cell # 091-2213445

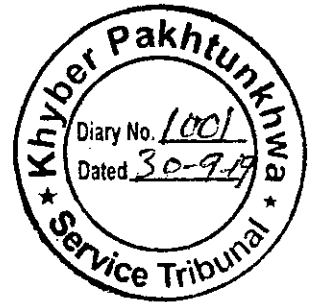
Dated ___ / ___ /2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Application No. 365 /2019

IN

Service Appeal No. 979 /2013



Dr. Muzaffar Iqbal,
Ex- Senior Registrar (Ophthalmology),
DHQ Hospital, D.I. KhanApplicant / Petitioner

Versus

1. The Govt. of Khyber Pakhtunkhwa,
through Chief Secretary,
Civil Secretariat, Peshawar.
2. The Secretary,
Govt of Khyber Pakhtunkhwa,
Health Department,
Civil Secretariat Peshawar.
3. The Director General,
Health Services,
Govt of Khyber Pakhtunkhwa,
Civil Secretariat Peshawar.
- ✓ 4. The Chief Executive, *Muhammad Raza Khan*
DHQ Hospital / Mufti Mehmood Teaching Hospital,
D.I. Khan
5. The Account General Office,
The Mall Road, Peshawar Cantt.
- ✓ 6. The District Account Officer,
D.I. Khan.....Respondents

APPLICATION UNDER CLAUSE (d) OF SUB-SECTION 2 OF THE SECTION 7 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR EXECUTION OF THE DECISION/ORDER PASSED ON 29-06-2015 BY THE LEARNED BENCH OF THIS TRIBUNAL IN SERVICE APPEAL NO. 979/2013 THEREBY THE IMPUGNED ORDER DATED 21-12-2012 OF REMOVAL FROM SERVICE WAS SET ASIDE AND CONVERTED INTO COMPULSORY RETIREMENT.

Respectfully Sheweth,

1. That applicant was the employee of Respondent Department holding the post of Senior Registrar (Ophthalmology) BPS-18 in DHQ Teaching Hospital, D.I. Khan. On the plea of absence he was removed from service by impugned order dated 21-12-2012 against which he filled Service appeal No.979 of 2013 after exhausting departmental remedy.
2. That the appeal was decided vide order dated 29-06-2015 (**Annexed-A**) and the relevant para thereof is reproduced as under.
 3. *It was not disputed that the appellant has rendered 23 years service and as during the course of arguments it was resolved that this Tribunal is competent and may convert major penalty of removal from service into compulsory retirement [Reference was made to 2007-PLC (C.S) 678 and 2007 PLC (C.S) 685]. In which circumstances, without going into merits of the case, the penalty imposed is therefore, converted into compulsory retirement of the appellant. The appeal is disposed off accordingly. Parties are left to bear their own costs.*
3. That after obtaining the attested copy of the order of this Hon'ble Tribunal, the applicant/ petitioner submitted an application for its implementation before the respondent No.2, who vide Notification dated 11-03-2016 departmentally converted removal from service into compulsory retirement. (**Annexed-B**)
4. That respondent No.2 partially executed the order to the extent of conversion of removal from service into compulsory retirement but the pensionary benefits alongwith provided fund,

benevolent fund and group insurance is still pending and not released in favour of the applicant/petitioner.

5. That applicant/petitioner has submitted numerous applications for implementation of the judgment of this Honourable Tribunal. All relevant information and documents were submitted and Pension papers were also made and submitted on behalf of respondent No.4, but till the date no positive action has been taken in reference to the release of pensionary benefits etc. (Annexure-C)
6. That respondents have deliberately not implemented the order of this Hon'ble Tribunal as a whole and malafidely withhold the pensionary benefits of the applicant/petitioner without any reasonable ground which amounting to contempt of Court/Tribunal.

It is therefore, prayed that on acceptance of this application, the Respondents may graciously be strictly directed to execute the decision of this Tribunal dated 29-06-2015 in letter and spirit and release the pensionary benefits of the applicant/petitioner forthwith without any further delay and the defaulter may kindly be proceeded under the law of contempt and be punished accordingly.

Through

Muzaffar Iqbal
Applicant/Appellant

Ashraf Ali Khattak
Advocate, High Court.

Dated: _____ / 09/ 2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Application No. ____/2019

IN

Service Appeal No. 979 /2013

Dr. Muzaffar Iqbal,
Ex- Senior Registrar (Ophthalmology),
DHQ Hospital, D.I. KhanApplicant / Petitioner

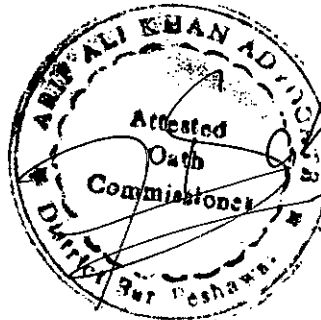
Versus

7. The Govt. of Khyber Pakhtunkhwa,
through Chief Secretary,
Civil Secretariat, Peshawar and others.....Respondents

AFFIDAVIT

I, Dr. Muzaffar Iqbal, Ex- Senior Registrar (Ophthalmology),
DHQ Hospital, D.I. Khan do hereby affirm and declare on oath that
the contents of this application for execution of the decision of this
Hon'ble Tribunal are true and correct to the best of my knowledge and
belief and nothing has been concealed from this Hon'ble Tribunal.

Muzaffar Iqbal
Deponent



4-9-2019



Sr. No.	Date of order/proceedings	Order or other proceedings with signature of Judge/Magistrate
1.	29.06.2015	<p style="text-align: center;">3</p> <p style="text-align: center;">BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</p> <p style="text-align: center;">Appeal No. 979/2013 :</p> <p>Dr. Muzaffar Iqbal Versus the Chief Secretary Khyber Pakhtunkhwa, Peshawar etc.</p> <p style="text-align: center;"><u>ORDER</u></p> <p><u>PIR BAKHSH SHAH, MEMBER.</u>- Counsel for the appellant (Mr. Muhammad Asif Yousafzai, Advocate) and Addl. Advocate General (Mr. Muhammad Adeel Butt) with Qibaz Khan, S.O for the respondents present. Arguments heard.</p> <p>2. This appeal has been filed by appellant Dr. Muzaffar Iqbal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned order dated 21.12.2012 whereby he has been removed from service on the allegations of willful absence from duty.</p> <p>3. It was not disputed that the appellant has rendered 23 years service and as during the course of arguments it was resolved that this Tribunal is competent and may convert major penalty of removal from service into compulsory retirement. [Reference was made to 2007-PLC (C.S)678 and 2007 PLC (C.S) 685], in which circumstances, without going into merits of the case, the penalty imposed is therefore, converted into compulsory retirement of the appellant. The appeal is disposed</p>

ATTESTED

EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal,
 Peshawar

off accordingly. Parties are left to bear their own costs. File be
consigned to the record room.

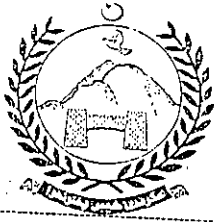
ANNOUNCED Sd/- Pir Bakhtish Shah,
29.6.2015. Member

Sd/- Abdul Latif,
Member

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation	08-01-2016
Number of Words	800
Copying Fee	6-00
Urgent	2-00
Total	8-00
Name of Copyist	[Signature]
Date of Completion of Copy	08-01-2016
Date of Delivery of Copy	08-01-2016



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: the 11th March 2016

Notification

No.SOH-I/HD/5-75/06 In pursuance of the judgement of Service Tribunal on appeal No.970/2013 dated 29/6/2015, the competent authority is pleased to convert the major penalty of removal from service imposed upon Dr. Muzaffar Iqbal, Senior Registrar Ophthalmology (BS-18), DHQTH D.I.Khan vide this department Notification No.SOH-I/HD/5-75/06 dated 21/12/2012 into compulsory retirement from service.

SECRETARY HEALTH

Endst No and date even

- C.C
- 1. Chief Executive, DHQH /Mullt Mehmood Teaching Hospital D.I.Khan.
- 2. Principal Gomal Medical College, D.I.Khan.
- 3. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 4. Distt: Accounts Officer, D.I.Khan.
- 5. Registrar, Service Tribunal Khyber Pakhtunkhwa.
- 6. Section Officer (Lit-II), Health Department.
- 7. Computer Programmer, Health Department.
- 8. Doctor concerned.
- 9. Personal file of the doctor concerned.

(Signature)
(Signature Ahmed) 11/3/16

(Signature)
Director

OFFICE OF THE HOSPITAL DIRECTOR

MEDICAL TEACHING INSTITUTION, DHQ/MMM TEACHING HOSPITALS, DIKHAN

ALL COMMUNICATIONS SHOULD BE ADDRESSED TO THE HOSPITAL DIRECTOR MTI DHQ/MMM TEACHING HOSPITALS DIKHAN AND NOT TO ANY OTHER OFFICIALS

No. 677 /

Dated 25 / 1 / 2019

To


ID. NO. 11637 / AR
30/1/19

The Director General Health Services
Khyber Pakhtunkhwa
Peshawar.

Subject: PENSION PAPERS
Memo:

Reference Government of Khyber Pakhtunkhwa Health Department
Peshawar Notification No. SOH-1/HD/5-75/06 Dated 11.03.2016.

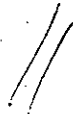
Pension papers in respect of Dr. Muzaffar Iqbal Ex. Senior Registrar
(Ophthalmology) BPS-18 DHQ Teaching Hospital Dikhan are sent herewith for favor of
further action please.


HOSPITAL DIRECTOR
MTI DHQ/MMM TEACHING HOSPITALS
DIKHAN

No. _____ /

A copy is forwarded to the:-

1. Dr. Muzaffar Iqbal Ex. SR (Ophthalmology) for information.


HOSPITAL DIRECTOR
MTI DHQ/MMM TEACHING HOSPITALS
DIKHAN

OFFICE OF THE HOSPITAL DIRECTOR

MEDICAL TEACHING INSTITUTION, DHQ/MMM TEACHING HOSPITALS, DIKHAN
ALL COMMUNICATIONS SHOULD BE ADDRESSED TO THE HOSPITAL DIRECTOR MTI DHQ/MMM TEACHING HOSPITALS DIKHAN AND NOT TO ANY OTHER OFFICIALS

No. 679 /

Dated 25 / 1 / 2019.

To

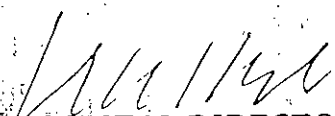
The Director General Health Services
Khyber Pakhtunkhwa
Peshawar.

Subject: **APPLICATION FOR THE RETIREMENT GRANT OUT OF KHYBER PAKHTUNKHWA GOVT. SERVANT BENEFUND.**

Memo:

Reference Government of Khyber Pakhtunkhwa Health Department
Peshawar Notification No. SOH-1/HD/5-15/06 Dated 11.03.2016.


The attached application form with the required documents on the above noted subject in respect of Dr. Muzaffar Iqbal Ex. Senior Registrar (Ophthalmology) BPS-18 DHQ Teaching Hospital DIKHAN are sent herewith for favor of further action please.


HOSPITAL DIRECTOR
MTI DHQ/MMM TEACHING HOSPITALS
DIKHAN

No. _____ /

A copy is forwarded to the:-

1. Dr. Muzaffar Iqbal Ex. SR (Ophthalmology) for information.


HOSPITAL DIRECTOR
MTI DHQ/MMM TEACHING HOSPITALS
DIKHAN

With official seal.

With official seal.

Signature & Name of the Head of Office
Department with official seal.

Signature & Name of the Head of
Administrative Department with
Office seal.

**APPLICATION FORM FOR THE RETIREMENT GRANT OUT OF
KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS
BENEVOLENT FUND PART-I & PART-II.**

10

01.	Name of Government Servant	MUZAFFAR IQBAL		
02.	Designation	Senior Registrar (Optometry)		
03.	Pay Scale	BPS 18		
04.	CNIC No.	14203-4090958-3		
05.	Date of Birth.	15/04/1957		
06.	Date of entry into Service.	01/10/1985		
07.	Date of RETIREMENT.	21/12/2012		
08.	Detail of Family Members.	Name.		
		Relation		Age.
		YASMIN KHATTAN	Wife	55 years
		UMAIR IQBAL	Son	26 "
		OBAD IQBAL	Son	25 "
		MEHREEN IQBAL	Daughter	21 "
		TAHREEM IQBAL	Daughter	17 "
		UZAIR IQBAL	Son	23 "
09.	Contact No.	03439806440 / 03329653379		

I do hereby solemnly affirm and verify that the contents of the above application are true to the best of my knowledge and nothing has been concealed.

I know that in the event of making a willful misrepresentation or suppression of facts, I shall be liable to criminal prosecution.

Signature of the Applicant

Name of the applicant

Temporary Address

Permanent Address

Muzaffar Iqbal

MUZAFFAR IQBAL

House No 3 Street No 2, RAHATABAD
Palesi Road. Peshawar.

AS ABOVE. VPO Ahmadabad, Tehsil TAKHTI
NASRATI. DIST. KARAK

I certify and attest the details furnished above are available in the record of this office.

**In case of Government Servants
In BPS-1 to BPS-15.**

**In case of Government Servants
In BPS-16 and above including
non-Gazetted Staff of
Civil Secretariat.**

Signature & Name of the Head of Office
With official seal.

[Signature]
Signature & Name of the Head of Office
With official seal.

Signature & Name of the Head of Office
Department with official seal.

Signature & Name of the Head of
Administrative Department with
Office seal.

**APPLICATION FORM FOR THE RETIREMENT GRANT OUT OF
KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS
BENEVOLENT FUND PART-I & PART-II.**

01.	Name of Government Servant	MUZAFFAR IQBAL		
02.	Designation	Senior Registrar (Ophthalmology)		
03.	Pay Scale	BPS 18		
04.	CNIC No.	14203-4090958-3		
05.	Date of Birth.	15/04/1957		
06.	Date of entry into Service.	01/10/1985		
07.	Date of RETIREMENT.	21/12/2012		
08.	Detail of Family Members.	Name.	Relation	Age.
		YASMIN KHATTAK	Wife	55 years
		UMAIR IQBAL	Son	26 "
		OBAD IQBAL	Son	25 "
		MEHREEM IQBAL	Daughter	21 "
		TAHREEM IQBAL	Daughter	17 "
		UZAIR IQBAL	Son	23 "
09.	Contact No.	0343 9806440 / 0332 9653379		

I do hereby solemnly affirm and verify that the contents of the above application are true to the best of my knowledge and nothing has been concealed.

I know that in the event of making a willful mis-representation of suppression of facts, I shall be liable to criminal prosecution.

Signature of the Applicant

Name of the applicant

Temporary Address

Permanent Address

Muzaffar Iqbal
 MUZAFFAR IQBAL
 House No 3, Street No 2, RAHAT ABAD
 Palesi Road, Peshawar
 SPO Ahmadabad, Tehsil TAKHTI
 AS ABOVE.
 NASRATI, DIST. KARAK

I certify and attest the details furnished above are available in the record of this office.

**In case of Government Servants
In BPS-1 to BPS-15.**

**In case of Government Servants
In BPS-16 and above including
non-Gazetted Staff of
Civil Secretariat.**

Signature & Name of the Head of Office
With official seal.

Signature & Name of the Head of Office
With official seal.

Signature & Name of the Head of Office
Department with official seal.

Signature & Name of the Head of
Administrative Department with
Office seal.

Detail of Amount of Retirement Grant Out of Benevolent Fund w.e.f.01-07-2010

Name of Grant	Category of Subscribers	Amount of Grant
Retirement Grant	BPS-1 to BPS-4	Rs.20,000/-
	BPS-5 to BPS-15	Rs.30,000/-
	BPS-16 and Above	Rs.55,000/-
Lump Sum Grant	BPS-1 to BPS-4	Rs.250,000 -
(Death During Service)	BPS-5 to BPS-15	Rs.350,000 -
	BPS-16 and Above	Rs.500,000 -

Notification No.

AD/10/11
Sd/- P.B. 11/11

Notes:

Amount of Retirement Grant of Govt. Kalyan Pension

Notes:

Please attach the following

- 1- Death Certificate of Deceased
- 2- Retirement Order
- 3- Last Pay Slip
- 4- C.N.I.C of Deceased
- 5- C.N.I.C of Legal Heirs
- 6- List of Legal Heirs
- 7- Benevolent Fund Regular Contribution
- 8- Photo Copy Pension Book
- 9- Dependent Certificate of Deceased
- 10- Certificate From Bank Showing Account Number.

APPLICATION FORM FOR THE LUMP SUM / RETIREMENT GRANT OUT OF HYBER
PAKHTUNKHWA GOVERNMENT SERVANTS BENEVOLENT FUND PART-I & PART-II

1	Name of Government Servant	MUZAFFAR IQBAL									
2	Designation	Senior Registrar (Ophthalmology)									
3	Pay Scale B.P.S.	18									
4	CNIC No.	14	20	3	-	40	90	95	8	-	3
5	Date of Birth	1	5	-	0	4	-	1	9	5	7
6	Date of Joining In Govt. Service	0	1	-	1	0	-	1	9	8	5
7	Date of Retirement	2	1	-	1	2	-	2	0	1	2
8	Detail of Family Members	S.No.	Name		Relation	Age					
		1	YASMIN KHATTAR		WIFE	55 yrs					
		2	UMAIR IQBAL		SON	26					
		3	OBAID IQBAL		SON	25					
		4	UZAIR IQBAL		SON	23					
		5	MEHREEN IQBAL		Daughter	21					
		6	TAHREEM IQBAL		Daughter	17					
		7									
		8									
		9									
		10									

I do hereby solemnly affirm and verify that the contents of the above application are true to the best of my knowledge and without any concealment.

I know that in the event of any non-disclosure, misrepresentation, suppression of facts, I shall be liable to criminal prosecution.

Signature of the Applicant: _____
 Name of the Applicant: _____
 CNIC of Applicant: _____

Address: _____

Contact No. _____

I certify and attest the details furnished above are available in the record of this office

In case of Government Servants in
BPS-1 to BPS-15

In case of Government Servants in
BPS-16 and above

[Handwritten Signature]

 Head of Office

Signature & Name of the Head of Office
with Official Seal

Signature & Name of the Head of
Department with Official Seal

Phone: 0966-9280201
Fax: 0966-9280446

OFFICE OF THE HOSPITAL DIRECTOR

MEDICAL TEACHING INSTITUTION, DHQ/MMM TEACHING HOSPITALS, DIKHAN

ALL COMMUNICATIONS SHOULD BE ADDRESSED TO THE HOSPITAL DIRECTOR MTI DHQ/MMM TEACHING HOSPITALS DIKHAN AND NOT TO ANY OTHER OFFICIAL

No. 682 /

Dated 25 / 1 / 2019

To

The Director General Health Services
Khyber Pakhtunkhwa
Peshawar.

D.No. 4638 / Budget
30/1/19

Subject: **FINAL PAYMENT OF GP FUND.**

Memo:

Reference Government of Khyber Pakhtunkhwa Health Department
Peshawar Notification No.SOH-1/HD/5-75/06 Dated 11.03.2016.

The attached application form for the grant of Final payment of GP Fund on the above noted subject in respect of Dr. Muzaffar Iqbal Ex. Senior Registrar (Ophthalmology) BPS-18 DHQ Teaching Hospital DIKHAN are sent herewith for favor of further countersignature and onward submission to DAO DIKHAN for issue of authority.



HOSPITAL DIRECTOR
MTI DHQ/MMM TEACHING HOSPITALS
DIKHAN

No. _____ /

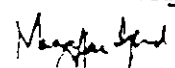
A copy is forwarded to the:-

- 1. Dr. Muzaffar Iqbal Ex. SR (Ophthalmology) for information.

HOSPITAL DIRECTOR

MTI DHQ/MMM TEACHING HOSPITALS
DIKHAN

9. Was his provident fund account maintained properly. If so given some details of the balance now payable. If not furnished the audit statements received from the audit office alongwith the particulars of the account.



WAKALAT NAMA

IN THE COURT OF Khyber Pakhtunkhwa Service Tribunal

Dr. Muzaffar Iqbal

Appellant(s)/Petitioner(s)

VERSUS

The Govt of Khyber Pakhtunkhwa and others

Respondent(s)

I/We _____ do hereby appoint
Mr. Ashraf Ali Khattak, Advocate High Court, Peshawar in the above
mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

Muzaffar Iqbal
Signature of Executants

Ashraf Ali Khattak

Ashraf Ali Khattak,
Advocate, High Court
Peshawar

9-B, Haroon Mansion
Off: Tel: 091-2213445

B.C # 1046-05

Cell # 0332-9931676

"B"

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

S.B

No.

Execution Petition No. 365 of 20 19
Appeal No.....

Dr. Muzaffar Iqbal Appellant/Petitioner

Versus

Through Chief Secy Peshawar Respondent

Respondent No. 1

Notice to: —

Through Chief Secretary
Peshawar

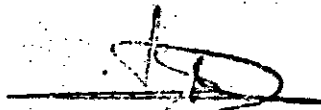
WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....22/11/2019.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

EIP
Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....29.....th.....

Day of.....October.....2019



Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

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

S.B

No.

Execution Petition No. 365

Appeal No. of 20¹⁹

Dr. Muzaffar Iqbal

Appellant/Petitioner

Through Chief Secy Peshawar

Versus

Respondent

Respondent No. 2

Notice to: —

The Secretary Health
Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....
Day of..... 29th October 20¹⁹

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

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

No.

S.B

Execution Petition No. 365 of 2019

Dy. Mirzaftab Iqbal Appellant/Petitioner
Versus

through Chief Secy Peshawar Respondent
Respondent No. 3

Notice to:

The Director General
Health Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....22/11/2019.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court, at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of EP is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....29/11.....

Day of.....October 20.....20 19



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
- 2. Always quote Case No. While making any correspondence.

"B"

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

S.B

No.

Execution Petition No. 365 of 20 19
Appeal No.....

Dr. Muzaffar Iqbal.....Appellant/Petitioner

Versus

through Chief Secy Peshawar Respondent
Respondent No.....*5*

Notice to: —

The Accountant General Peshawar

[Signature]
ASST. ACCOUNTS OFFICER
G.O.A.G. Khyber Pakhtunkhwa Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....*22/11/2019* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

EP
Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....*29/11*.....

Day of.....*October*.....20 *19*

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.