

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No.7142/2021

Date of Institution ... 13.07.2021
Date of Decision ... 08.11.2022

Muhammad Raheem S/O Fazal Raheem R/o Shagyali Bala, House
No.1 P/O Shaggali Payan, District Peshawar.

... (Appellant)

VERSUS

Secretary Health Department, Government of Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar and five others.

... Respondents)

Present:

NasruminAllah,
Advocate ... For appellant.

Asif Masood Ali Shah,
Deputy District Attorney ... For respondents.

Mrs. Rozina Rehman ... MEMBER (J)
Miss. Fareeha Paul ... MEMBER (E)

JUDGMENT

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

**“That on acceptance of this service appeal, the
respondent department may please be directed to
incorporate the actual date of birth of the appellant
as 01.01.1964 in the service record and thereafter the
retirement order bearing endorsement No. 19333-38**



dated 09.02.2020 may kindly be cancelled/withdrawn and he may be allowed to complete his service upto the age of superannuation, which is 01.01.2024 with all benefits of salaries and arrears.”

2. Brief facts of the case are that the appellant joined the respondent department as Chowkidar on 01.09.1987. His date of birth was 01.01.1964. He came to know about the wrong entry in respect of his date of birth, and therefore, submitted representation for its rectification but to no avail. He filed civil suit for declaration but the same was returned to the appellant in original for presentation before the competent forum. Hence the present service appeal.

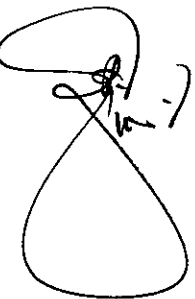
3. Mr. NasruminAllah learned counsel for the appellant submitted that the correct date of birth of the appellant was 01.01.1964 and that being illiterate person he was not aware of wrong entry made by the department in his service record without taking into consideration his CNIC. Learned counsel submitted that his salary was stopped and his order of retirement was issued which was wrong, illegal against law and facts because the entry in respect of his date of birth was wrongly made by the department and not by the appellant. He was not afforded any opportunity of personal hearing and he was condemned unheard. Lastly, he submitted that no regular inquiry was conducted into the matter and that CNIC of the appellant was not considered, he therefore, requested that the appeal may kindly be accepted.

4. Conversely, learned Deputy District Attorney submitted that as per service book of the appellant, his date of birth was 01.07.1958

and that his date of birth could not be altered at that stage as per G.F.R.116. He therefore requested for the dismissal of instant service appeal.

5. From the record it is evident that the appellant, Mr. Muhammad Raheem, was appointed as Chowkidar on 24.06.1987. His service book shows his date of birth as 01.07.1958. This entry in the service record was never objected to by the appellant during his service. He filed a civil suit for declaration for correction of his date of birth in his service record and CNIC which plaint was returned to the appellant for presentation before proper forum vide order of learned Sessions Judge dated 15.06.2021. In view of entry in service book regarding his date of birth, the appellant stood retired from government service w.e.f 30.06.2018 vide office order of the District Health Officer dated 09.02.2020 which means that he served the department even after attaining the age of retirement on 30.06.2018. There is nothing on file which could show that any order in respect of recovery was passed against appellant by the competent authority, however, pension was not paid to the appellant till today. The change of date of birth in service record is allowed within two years of entry into service according to G.F.R-116.

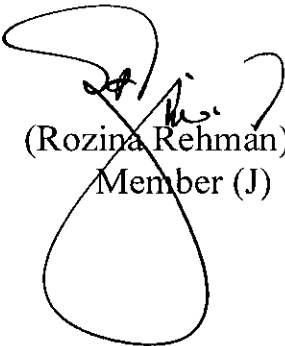
6. Having considered the matter from all angles in the light of material available on file, we do not find any merit in the instant appeal which is hereby dismissed. However, the respondents are directed not to pass any order in respect of recovery because he served the department and was paid accordingly. The pension process be



expedited and the same be paid to the appellant according to law.
Parties are left to bear their own costs. File be consigned to the record
room.

ANNOUNCED.
08.11.2022


(Faeeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

ORDER

08.11.2022


Appellant present through counsel.

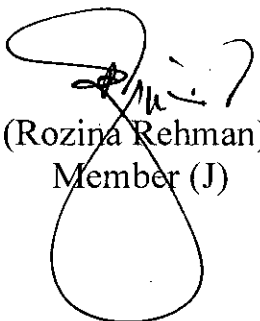
Asif Masood Ali Shah learned Deputy District Attorney for respondents present. Arguments heard. Record perused.

Vide our detailed judgment of today of this Tribunal place on file, we do not find any merit in the instant appeal which is hereby dismissed. However, the respondents are directed not to pass any order in respect of recovery because he served the department and was paid accordingly. The pension process be expedited and the same be paid to the appellant according to law. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

08.11.2022


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

14.10.2022

Mr. Akhtar Ali, son of the appellant present. Mr. Muhammad

Riaz Khan Paindakhel, Assistant Advocate General for the

respondents present.

Son of the appellant requested for adjournment on the ground

that learned counsel for the appellant is not available today due to

strike of lawyers. Adjourned. To come up for arguments before

the D.B on 08.11.2022.

(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

2-3-22

due to Retirement of the Hon'ble
Chairman The case is adjourned to come
up for the same as before on 30-5-22

[Signature]
Reader

30th May, 2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Asstt. AG alongwith Mastan Ali Shah, Assistant for the respondents present.

Learned counsel for the appellant seeks adjournment in order to properly assist the Court. Adjourned. To come up for arguments on 03.08.2022 before the D.B.

[Signature]

(Mian Muhammad)
Member(E)

[Signature]

(Kalim Arshad Khan)
Chairman

3-8-2022

Proper DB not available the
case is adjourned to 14-10-2022

[Signature]
Reader

M. Rahim 7142/2021

13.09.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that the appellant was retired from service w.e.f 30.06.2018 vide impugned order dated 09.12.2020 though he had already submitted an application for correction in his date of birth to respondent No.2, on 20.07.2020. He also instituted Civil Suit for correction in date of birth, on 24.08.2020 and it was during pendency of his civil suit that the impugned order dated 09.12.2020 was issued by the respondent-department. The Civil Suit in question was however returned on the ground of jurisdiction with the direction to approach appropriate legal forum. He contended that actual date of birth in respect of the appellant is 01.01.1964 instead of 01.07.1958 (recorded/entered at page-3 of the service book). The actual date of birth in 01.01.1964 is also reflected in CNIC of the appellant. As per decision of the court of Civil Judge-IX Peshawar dated 15.06.2021, the instant service appeal was filed in Service Tribunal on 13.07.2021.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections including limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time or extension of time is not sought, the office shall submit the file with a report of non-compliance. File to come up for arguments on 24.12.2021 before the D.B.

Appellant Deposited
Security & Process Fee

26/10/21

(Mian Muhammad)
Member(E)

24.12.2021

Due to winter vacations, case is adjourned to 02.03.2022 for the same as before.

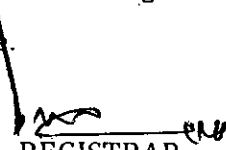

Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7142 /2021

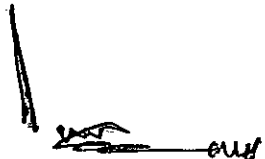
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/08/2021	<p>The appeal of Mr. Muhammad Rahim resubmitted today by Mr. Nasruminallah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muhammad Rehman son of Fazal Raheem r/o Shagyal Bala House No.1 post office Box Shaggali Payan Peshawar received today i.e. on 13.07.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Address of respondent no. 5 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Check list is not attached with the appeal.
- 4- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 5- Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter in this Tribunal.

No. 1291 /S.T,

Dt. 14/07 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Nasruminallah Adv. Pesh.

R/Sir

All the objection are cleared,
the case is re-submitted before
the honorable court.

Departmental appeal is
attached in page 44-67.



4/8/21

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: _____

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

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

Name: _____

Usman Ullah

Signature: _____

(Usman Ullah)

Dated: _____

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Service No:- 7142/2021

Muhammad Raheem S/o Fazal Raheem R/o Shagyali Bala, House No 1, PO Box, Shaggali Payan, District Peshawar.

Khyber Pakhtunkhwa Service Tribunal
Appellant

Diary No. 7241

Versus

Dated 13/7/2021

1. Secretary Health Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. District Health Officer, Town-II, Peshawar.
3. Director General AGPR Khyber Pakhtunkhwa, Peshawar Division, Peshawar.
4. Chairman NADRA, Islamabad.
5. Director General, ~~NADRA~~ Islamabad.
6. Regional Director NADRA, Head Office, Hayat Abad, Peshawar.

Filed to-day

..... Respondents

Registrar

13/7/21

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 TO THE EFFECT THAT THE ACTUAL DATE OF BIRTH OF THE APPELLANT/EMPLOYEE i.e. 01/01/1964 AND THE RESPONDENT DEPARTMENT HAS WRONGLY INCORPORATED THE DATE OF BIRTH OF THE APPELLANT/EMPLOYEE, WHICH NEEDS CORRECTION AND INCORPORATION OF THE ACTUAL DATE OF BIRTH i.e. 01/01/1964 IN SERVICE RECORD INSTEAD OF 01/07/1958.

Respectfully Sheweth:-

1. That the appellant/employee joined the department in the capacity of Chowkidar on 01/09/1987. (Copy attached as

Annexure A).

re-submitted to-day and filed.

Registrar

4/8/2021

2. *That the appellant/employee is illiterate having no education and for that purpose he can not read English and Urdu.*
3. *That the date of birth of the appellant//employee is 01/01/1964. (Copy of the CNIC is attached as annexure B).*
4. *That when the appellant/employee came to know about wrong entry of his date of birth, the appellant//employee submitted his departmental representation/appeal to the respondent department for correction of date of birth but no action whatsoever has been taken departmental representation, so the appellant/employee filed civil suit for declaration to the effect that the appellant's actual date of birth i.e. 01/01/1964 which was wrongly incorporated in the record of department as 01/07/1958, but that suit has been returned vide order dated 15/06/2021 in original to, be presented before the competent forum. (Copy of suit is annexed as annexure C).*
5. *That in the above titled suit the respondent/Health Department has submitted his written statement. (Copy of written statement with enclosure is annexed as D).*
6. *That similarly respondent/NADRA has also submitted written statement alongwith enclosure. (Copy of written statement is attached as annexure E).*

where in the date of retirement has been shown as 01/01/2024.
(Copy attached as annexure H).

- F. That during the pendency of Civil Suit, the respondent department vide order bearing No 19333-38 dated 09/02/2020 has retired the appellant/employee with effect from 30/06/2018 despite the fact that the appellant/employee has performed his duty upto 09/02/2020 and has also drawn his salary through DDO of the department. (Copy of office order is attached as annexure I & I-1).
- G. That the respondent/department on one hand issued salary to the appellant/employee upto 09/02/2020 keeping in view date of birth of the appellant/employee as 01/01/1964, but on the other hand has retired the appellant/employee with effect from 30/06/2018.
- H. That the respondent department has illegally and without lawful authority has retired the appellant with effect from 30/06/2018, because the appellant age of superannuation on the proforma is 01/01/2024.
- I. That the delay in service appeal is condonable as the appellant/employee approached for declaration against the respondent department/ as well as NADRA.

7. *That the appellant/employee invokes the appellate jurisdiction of this Honourable Tribunal for correction of date of birth and directions to the respondent department to incorporate the same in this record on grounds inter alia:-*

Grounds:-

- A. *That the actual date of birth of the appellant/employee is 01/01/1964, which is also reflects the record of NADRA.*
- B. *That the appellant/employee, being illiterate, was not aware of wrong entry made by the respondent/department, which the respondent has incorporated in their record without considering CNIC of the appellant/employee, which shows that the actual date of birth is 01/01/1964.*
- C. *That the department service ID Card issued to the appellant/employee reflect the date as 01/01/1964. (Copy of Service Card is attached as annexure F).*
- D. *That when the appellant/employee came to know about the wrong entry of date of birth, he submitted appeal/ representation to the department, but no reply from the department, so the appellant was constrained to file Civil Suit, requesting for declaration, against the respondents as well as NADRA authorities. (Copy attached as annexure G).*
- E. *That in the proforma duly filed and issued by the department also bear date of birth of the appellant/employee is 01/01/1964*

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J. That any other grounds available to the appellant/employee , with leave of Honourable Tribunal will be raised at the final hearing of the case/appeal.

It is, therefore, humbly requested that on acceptance of this service appeal, the respondent department may please be directed to incorporate the actual date of birth of the appellant/employee as 01/01/1964 in the service record and thereafter the appellant/employee retirement order bearing endorsement No 19333-38 dated 09/02/2020 may kindly be cancelled/ withdrawn and the appellant/ employee may please be allowed to complete his service upto the age of superannuation, which is 01/01/2024 with all benefits of salaries and arrears.

Dated:- 12.07.2021



Appellant

Through:-

Nasrumin Allah
NasruminAllah
Advocate High Court
Peshawar.

CERTIFICATE:

It is certified that no such like appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

Nasrumin Allah
ADVOCATE

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service No:- _____/2021

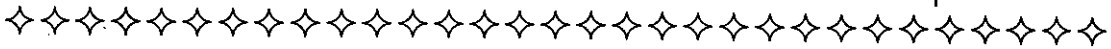
Muhammad Raheem

Versus.

Secretary Health Department
& others

..... Appellant

..... Respondents



AFFIDAVIT

I, Muhammad Raheem S/o Fazal Raheem R/o Shagyal
Bala, House No 1, PO Box, Shaggali Payan, District Peshawar,

(The appellant) do hereby solemnly affirm and declare on oath that the contents of this accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

DEPONENT
CNIC No:- 77301-2539181-5
Cell No:- 0313-9628629



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

CM No:- _____ /2021

In

Service No:- _____ /2021

Muhammad Raheem

Versus

Secretary Health Department
& others

..... Appellant

..... Respondents



APPLICATION UNDER SECTION 5 & SECTION 14 OF
LIMITATION ACT, 1908 FOR CONDONATION OF DELAY
OCCURRED IN FILING OF ABOVE TITLED APPEAL BEFORE
THIS HONOURABLE TRIBUNAL.

Respectfully Sheweth:-

1. *That the above appeal has been filed by the petitioner wherein no date of hearing has yet been fixed.*
2. *That the appellant/petitioner filed a Civil Suit before the court of Civil Judge, Peshawar for declaration against the respondents and NADRA for the reasons that against NADRA the service appeal was not competent.*
3. *That the delay in filing of Service Appeal is not willful but is due to declaratory against respondents including department,*

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who are beyond the condition of service of appellant/
petitioner.

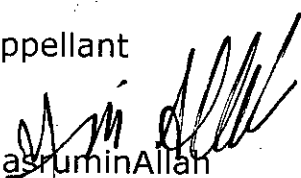
4. That the term and superior judiciary of the country in number of judgments and authorities has held that is decided on merits and not on technicalities.
5. That the appellant/petitioner is illiterate person, having no knowledge of technicalities and whatever the appellant/petitioner has done in wrong forum, if it would be, it was not intentional or willful

It is, therefore, most humbly prayed that on acceptance of this application the delay, if any, in filing the above noted Service Appeal may kindly be condoned in the interest of justice.

Dated:- 06/07/2021

Through:-

Appellant


Nasrumin Allan
Advocate High Court
Peshawar.

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

CM No:- _____ /2021

In

Service No:- _____ /2021

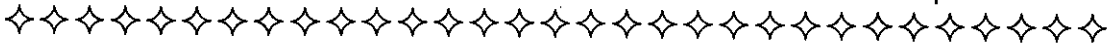
Muhammad Raheem

Versus

Secretary Health Department
& others

..... Appellant

..... Respondents



AFFIDAVIT

I, Muhammad Raheem S/o Fazal Raheem R/o Shagyal
Bala, House No 1, PO Box, Shagyal Payan, District Peshawar,

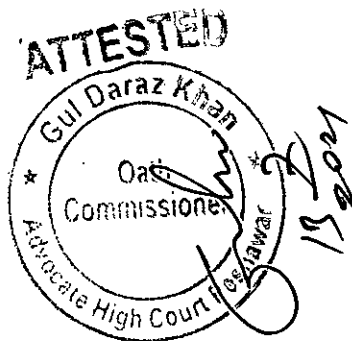
(The appellant) do hereby solemnly affirm and declare on oath that the contents of this accompanying application for condonation of delay are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT

CNIC No:- 17301-2539181-5

Cell No:- 0313-9628629



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service No:- _____/2021

Muhammad Raheem

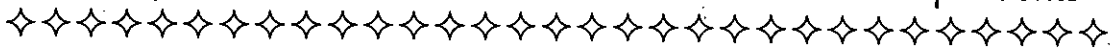
Versus

Secretary Health Department

& others

..... Appellant

..... Respondents



ADDRESSES OF PARTIES

APPELLANT

Muhammad Raheem S/o Fazal Raheem R/o Shagyali Bala, House No 1,
PO Box, Shaggali Payan, District Peshawar.


RESPONDENTS

1. Secretary Health Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. District Health Officer, Town-II, Peshawar.
3. Director General AG Khyber Pakhtunkhwa, Peshawar Division, Peshawar.

Dated:- 06/07/2021

Through:-

Appellant


Nasr Amin Allan
Advocate High Court
Peshawar.

Change in the recorded date of birth of the civil servants

I am directed to say that under the existing rules, immediately after his induction into service, every civil servant is required to declare the date of his birth by the Christian era with as far as possible confirmatory/conclusive evidence such as matriculation certificate, municipal birth certificate and so on. This is supplemented by the opinion of the Civil Surgeon/Standing Medical Board. The department after full satisfaction with age and on the basis of medical examination of the new entrant in the department, enter the same in an authentic document i.e. Service Book/History of Service etc. The said document is maintained by the Department/Audit and is always checked periodically.

2. The date of birth of a civil servant as recorded in his service documents remains constantly in his knowledge. This is reiterated in his ACRs and the Seniority List issued by the department from time to time. The preparation of service record of an officer is an official act and according to law, it is presumed to be correct. GFR-116 also provides that the date of birth once recorded cannot be altered except in the case of clerical error, without the previous orders of the Local Administration. Despite this, certain Government Servants are complacent with the state of affairs and sleep over their rights for decades knowing fully about their dates of birth entered in their Service Books etc. It would therefore be too much to accept such a belated claim from a Civil Servant that he was born on a date other than the one entered in his service documents and that the delay in representation was due to ignorance of the alleged erroneous entry. After all, there is always attached a finality to decisions taken by competent authorities.

3. I am, accordingly, directed to request that all concerned may please be informed in clear terms that in future a request for an alteration in the recorded date of birth of a Government servant may only be entertained by the Appointing Authority in the case of officers in BS-17 and above and by the Administrative Department in the case of civil servants in BS-16 and below, after special enquiry and only if the Government servant applies for it within two years from the date of his entry into Government service.

(Authority; No.SOR.II(S&GAD)5(40)/87, dated 15th February, 1989)

Criteria/modalities for classifying death/ incapacitation of civil servants in the line of duty for the purpose of compensation.

1. DEFINITIONS

- (a) Civil Servant. Civil Servant means the same as defined in the Government of NWFP Civil Servants Act, 1973. However, the employees of Federal Government serving in Provincial Government would also be considered civil servants in the above mentioned meaning for the purpose of this letter.

- (b) Shaheed. Shaheed death due to terrorism.
- (c) Act of terrorism. Section-6 of the Terrorism Act.
- (d) Permanent. Involvement in severing of an impairment of human body.
- (e) Temporary. Involvement in The compensation misuse.

2. **"In the line of Duty"**

In the line of duty means the following:

- I. To reside in a place of duty.
- II. To come and place of duty his/her native place.
- III. Duty hours.
- IV. To come in institutions, intellectual, family.
- V. Employees from Security.
- VII. While busy.

A civil servant, as defined in the Terrorism Act, anywhere, anytime he/she is, will deserve to get the compensation.

3. **Required Documents**

For Shaheed:-

- Obituary issued by the Department.
- Police FIR. In case of Shaheed verified by the Police.

Date of Birth Issue

DFA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT, ABBOTTABAD

Service Appeal No. 365/2019

Date of Institution ... 15.03.2019
Date of Decision ... 15.11.2024

Rasool Shah son of Sarfaraz, resident of Khaial, District Kohistan.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Education, Peshawar and two others.

... (Respondents)

Abdul Saboor Khan,
Advocate

... For appellant.

Muhammad Riaz Khan Paindakheil,
Assistant Advocate General

... For respondents.

Ahmad Sultan Tareen
Rozina Rehman

... Chairman
... Member (J)

JUDGMENT

Rozina Rehman, Member(J): Brief facts of the case are that appellant was a Janitor/Chowkidar in GP.S Kewkail, Kohistan who was later on appointed as P.S.T on 20.03.2015, where-after, he tendered resignation from the post of Chowkidar. His appointment order dated 30.03.2015 was withdrawn on 01.12.2015. He, therefore, assailed the order of authority before the Hon'ble Peshawar High Court, however, during pendency of the Writ Petition, impugned order dated 10.12.2018 was passed, therefore, writ petition was dismissed. The appellant filed departmental appeal being aggrieved from the

03.11.2022

Appellant alongwith counsel present.

Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. To come up for written reply/comments on 07.12.2022 before S.B.

(Rozina Rehman)
Member (J)

impugned order dated 10.12.2018 but to no avail, hence, the present service appeal.

2. We have heard Abdul Saboor Khan Advocate learned counsel for appellant and Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

3. Abdul Saboor Khan Advocate, learned counsel for appellant submitted that the impugned dated 10.12.2018 is wrong, illegal, against law and facts as he was not treated according to law. He contended that the appellant was only Seven years old in the year 1997, therefore, he could not manipulate his appointment and that the present appointment of the appellant as P.S.T was not suffering from any legal defect nor the appellant lacks basic qualification, therefore, the impugned order is not tenable. He contended that neither discreet nor any proper regular inquiry was made, therefore, the impugned order is not sustainable. That the appellant was not afforded any opportunity of personal hearing and he was condemned unheard. He contended that the appointment of appellant as P.S.T vide order dated 20.03.2015 is correct and according to law as he was appointed after having being declared eligible and qualified by the competent authority and in consequence of the appointment order, he was medically examined where-after he submitted his charge report and performed duty till 01.12.2015. Lastly, he submitted that no regular inquiry was conducted into the matter and that CNIC verification from NADRA was never attempted which shows that all allegations were false. He, therefore, requested that the appellant may be reinstated into service with all back benefits.

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA,

PESHAWAR

**Service Appeal No. 408/2022
Mr. Muhammad Javed**

Appellant

Versus

**Secretary to Govt. of Khyber Pakhtunkhwa Finance Department and
others.**

Respondents

**Reply /Parawise Comments on Behalf of Secretary Finance Govt. of
Khyber Pakhtunkhwa Respondent No.01.**

AFFIDIVAIT

I Mukaram Khan, Section Officer Govt. of Khyber Pakhtunkhwa Finance Department do hereby solemnly affirm and declare on oath that the contents of Para-wise Comments in Service Appeal No.408/2022 on behalf of Secretary to Govt. of Khyber Pakhtunkhwa Finance Department is true and correct to the best of my knowledge and belief and that nothing has been concealed from the Honorable Tribunal.



Deponent

4. Conversely, learned AAG submitted that the appellant was initially appointed as Class-IV on 05.11.1997 and he performed his duty till 20.03.2015 and got salary for the said period. He contended that as per original Service Book of the appellant, his correct date of birth is 02.01.1966, whereas, appellant fraudulently produced fake documents and CNIC having date of birth as 02.01.1990. He submitted that a formal inquiry was conducted and chance of personal hearing was provided to the appellant and that appointment order of the appellant was withdrawn on the charge of having two identity cards having different date of birth.

5. From the record it is evident that appellant Rasool Shah was appointed as Chowkidar vide order dated 05.11.1997. His Service Book shows his date of birth as 02.01.1966 and there is no dispute in respect of his salary during the period he remained in service. It was on 20.03.2015 when upon the recommendation of the District Selection Committee present appellant Rasool Shah was appointed as P.S.T in BPS-12. After joining the post of P.S.T, he submitted his resignation from the post of Chowkidar. This fact is not denied that the present appellant had been appointed as Chowkdar on 05.11.1997, whereas, his date of birth as per Secondary School Certificate is 02.01.1990. His date of birth at the time of his appointment as Chowkidar was recorded as 02.01.1966 and thus he succeeded in getting the job of Chowkidar at the age of less than eight years. In view of having shown two different dates of birth for getting two different jobs, the matter was inquired and even at present, this fact has not been denied, therefore, his order of appointment was withdrawn and major penalty of dismissal from service was imposed upon him.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No.408/2022

Muhammad Javed.....(Appellant).

V E R S U S

1. Secretary to Government of Khyber Pakhtunkhwa, Finance Department.
2. Secretary to Government of Khyber Pakhtunkhwa, Agriculture Department.....(Respondents)
3. Deputy Director Fisheries Mansehra..... Respondents

COMMENTS ON BEHALF OF RESPONDENT NO. 1

Preliminary Objections:

1. That Applicant/Defendant has no cause of action /locus standi to file such like application at this belated stage.
2. That the Honorable Court has got no jurisdiction to entertain the present application.
3. That the applicant is estopped by Law, by deed and by his own conduct to file the instant application.
4. That the applicant has suppressed material facts from this Honorable Court.
5. That application of the applicant is incompetent in the present form and liable to be rejected summarily with heavy cost.

Facts:

1. Pertains to Record. Hence needs no comments.
2. Pertains to Record. Hence needs no comments.
3. Pertains to Record. Hence needs no comments.
4. Correct. Agriculture Department took up the case of the appellant with Finance Department for advice. This Department advised the Administrative Department to decide the case under section-4 (a) ii of NWFP (now Khyber Pakhtunkhwa) Government Servants E&D Rules and under section 2(ii) of Government decisions of Services Problems and Solutions (**Annex-I**).
5. Pertains to Agriculture Department.

Grounds:

- a. Pertains to Agriculture Department.
- b. No comments.
- c. Correct.
- d. Pertains to Agriculture Department.
- e. No comments.
- f. Correct.
- g. Correct.
- h. Correct.

In view of above, the case may kindly be decided/disposed of on merit.

Secretary to Govt. of Khyber Pakhtunkhwa
Finance Department
(Respondent No.1)

6. Having considered the matter from all angles in the light of material available on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

15.11.2021

(Ahmad Sultan Tareen)
Chairman
Camp Court, A/Abad

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



**GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT**

Finance Department Civil Secretariat Peshawar <http://www.finance.gkp.pk> [facebook.com/GokPFD](https://www.facebook.com/GokPFD) twitter.com/GokPFD

NO. FD (SOSR-1) 2-123/2021 (M. Javed)
Dated Peshawar the 24-05-2021

To: *(Handwritten mark)*
The Section Officer (LFC),
Agriculture, Livestock, Fisheries & Cooperative Deptt
Peshawar.

Subject: APPLICATION FOR RESTORATION OF ANNUAL INCREMENT
FOR THE YEAR 2000, IN RESPECT OF MR. MUHAMMAD JAVED,
HEAD FISHERIES WATCHER.

I am directed to refer to your letter No. SO (LFC) AD/2-23/2020 dated 05-04-2021 on the subject noted above and to advise that the instant case may be examined under Section 4(a) (i) of NWFP (now Khyber Pakhtunkhwa) Government Servants (E&D) Rules, 1973 and under Section 2(ii) Government decisions of Services Problems & Solutions which are crystal clear (copies enclosed).

(Handwritten signature)
(REHMAT KHAN)
SECTION OFFICER (SR-1)

*Attest
Mujib*

Mujib
27/5

Date of Birth Issue

DFA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.354/2018

Date of Institution ... 09.03.2018
Date of Decision ... 24.06.2021

Noor Jalil S/O Jalander Khan, Deputy Superintendent of Police,
Directorate of Anti-Corruption Establishment Khyber Pakhtunkhwa
Peshawar.

... (Appellant)

VERSUS

Provincial Police Officer Khyber Pakhtunkhwa Peshawar and one
another.

... (Respondents)

Present:

Arbab Saiful Kamal,
Advocate ... For appellant.

Muhammad Adeel Butt,
Additional Advocate General ... For respondents.

AHMAD SULTAN TAREEN ... CHAIRMAN
ROZINA REHMAN ... MEMBER (J)

JUDGMENT

ROZINA REHMAN, MEMBER: Appellant, Noor Jalil has filed this appeal for
correction of his date of birth in the service record as 01.02.1959 instead
of 01.02.1958 which according to the appellant, has incorrectly been
recorded.

2. Learned counsel for appellant contended that two different dates
of birth were recorded in the medical report as well as in the service
book of the appellant which does not appeal to a prudent mind. He
submitted that the authentic date of birth of appellant is 01.02.1959

L. That the appellant has not been treated in accordance with Article 25 of the constitution of Islamic republic of Pakistan, 1973:

It is, therefore, most humbly prayed that on acceptance of this departmental appeal may kindly be accepted as prayed for in the heading of the appeal

Applicant



Syed Anwar

23/11/20

Assistant (BPS 16)

which was correctly recorded in the S.S.C and CNIC of the appellant. He argued that similar relief was extended by the respondents to other incumbents refusing the same relief to the appellant tantamount to discrimination.

3. Conversely, learned A.A.G resisted the appeal on several grounds including the plea that at the time of recruitment, the date of birth of appellant was recorded as 01.02.1958 and the appellant was raising this issue after 42 years though he was bound to raise the issue within two years of joining of service. He contended that change of date of birth in service record is allowed according to Police Rules 9.7 and G.F.R-116 within two years of entry into service, whereas, the request of appellant is badly time barred.

4. The case of appellant is that in his service book/service record his date of birth has incorrectly been recorded as 01.02.1958 while his actual date of birth was 01.02.1959 as recorded in the Secondary School Certificate and his Computerized CNIC. No doubt, appellant has placed on file Secondary School Certificate, however, his service record clearly shows entry in respect of his date of birth as 01.02.1958. The change of date of birth in service record is allowed within two years of entry into service according to Police Rules 9.7 and G.F.R-116. It has become a common practice with the civil servants to file suit for correction of date of birth when they come to the verge of retirement just to prolong their tenure for enjoying perks & privileges at the cost of others. Admittedly, the appellant joined the service in the year 1976 and passed his S.S.C held in March/April, 1976. It is beyond imagination that he was not in the knowledge of his actual date of birth despite the passage of more than 40 years.

MUST IMMEDIATE /
COURT MATTER



TIME LIMIT CASE OUT TODAY
GOVERNMENT OF KHYBER PAKHTUN
ESTABLISHMENT DEPARTMENT
(JUDICIAL WING)

No: SO(Lit-III)E&AD/3-23/2020
Dated: Peshawar, the 17th August, 2020

To:

The Secretary to Govt. of Khyber Pakhtunkhwa,
Information Department,
Peshawar.

Subject: APPEAL NO. 5804/2020 - SYED ANWAR VS GOVERNMENT OF
KHYBER PAKHTUNKHWA & OTHERS.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith copy of Notice dated 27.07.2020, received from Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar, with the request to depute an Officer (not below the rank of BPS-17) well conversant with the facts of the case to brief the Additional Advocate General, Khyber Pakhtunkhwa, Service Tribunal alongwith relevant record and to assist him before the Court on 18th September, 2020. The proceedings of the court may kindly be intimated to this Department accordingly for perusal of the Competent Authority, please.

(Encl: As Above:)

Yours faithfully,

Section Officer (Litigation-III)

Encl: of Even No. & Date:

Copy forwarded to the:-

1. P.S to Secretary, Establishment Department.
2. P.S to Special Secretary, Establishment Department.
3. P.A to Additional Secretary (Judicial), Establishment Department.
4. P.A to Deputy Secretary (Judicial), Establishment Department.
5. Master file.

Section Officer (Litigation-III)

AS:
22/8/20 DS(A)

24/8/20

So. Ad
24/8/20

5. Keeping in view the above discussion, we do not find any merit in the present appeal which is hereby dismissed. With no order as to costs. File be consigned to the record room.

ANNOUNCED.
24.06.2021

(Ahmad Sultan Tareen)
Chairman

(Rozina Rehman)
Member (J)

4571

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

4571/11F

13-08-2020

58104

Legal Section, ELCS
Div No. 346
Sub. No. 12-8-2020

..... of 2020
Sd/- *[Signature]* Applicant/Petitioner

Versus

Chief Secy Govt of KPK Respondent

Respondent No. I

Chief Secretary Govt. of KPK
Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1977, has been presented/registered for consideration, in accordance with the writic herein this Court and notice has been ordered to issue. You are hereby notified that the said appeal/petition is fixed for hearing before the Tribunal on 18/09/2020 at 9.00 A.M. If you wish to urge anything against the appointment of the respondent herein, you may do so on the date fixed, or any other day to which the date may be postponed. This may be done by authorized representative or by any other person authorized by the respondent. You are, therefore, required to file in the Court a statement of facts and grounds of hearing & copies of written statement served on the other party. Please also enclose order book in the manner as mentioned in the appeal/petition, if any, and the respondent's answer.

Notice of any change in the address for hearing of this appeal/petition will be deemed to have been registered only if it is filed before the Registrar of any change in your address. You must also inform the Registrar of any change in the address contained in this notice which the respondent will be deemed to be your contact address, and on that address the Registrar will be deemed sufficient for the purpose of any notice.

.....
.....
.....

Given under my hand and the seal of this Court, at Peshawar this..... 27th

Day of..... July 2020

[Signature]
13/8

[Signature]

[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.

SA

"A"

11

MOHAMMAD RAHIM

CHOWKIDAR

45

Town - 2

OF

PW-6154

10

MR. Mohammad Rahim

CHOWKIDAR

119
533

P#H.00040176

D.O-Birth: - 1-7-1958

D.O-Retirement: - 30-6-2018

GS&PD. NWFP. - 1595 P. B. 50,000 B. - 3-5-87 (25).

Price No. 4.30

03139628629

50/20/1

Handwritten signature

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

- 1. Name .. *Mohammad Rahim*
- 2. Race .. *Muslim*
- 3. Residence .. *village Gatti Pura P.O. Nakay
Tehsil and Distt. Peshawar.*
- 4. Father's name and residence .. *Fazli Rahim
as above.*
- 5. Date of birth by Christian era as
nearly as can be ascertained .. *1-7-1958.*

6. Exact height by measurement .. *5-8*

7. Personal marks for identification .. *A mole on back of neck.*

8. Left hand thumb and Finger impres-
sion of (non-gazetted) officer ..

Little Finger.

Ring Finger

Middle Finger

Fore Finger

Thumb.

9. Signature of Government servant. *[Signature]*

10. Signature and designation of the
Head of the Office, or other Attesting
Officer. ...

[Signature] DEAN
Post Graduate Medical Institute
& Administration, Lady Reading
Hospital, Peshawar *awf*

PAY FIXATION PROFORMA UNDER REVISED PAY SCALES RULES, 1991.

- 1. Name & Designation M. Muhammad Mahsum Chander
- 2. Existing pay Scale 600-13-860
- 3. Modified pay scale 605-17-860
- 4. Revised pay scale 920-26-1310
- 5. Pay on 31.5.1991 652/-
- 6. Pay fixation made under Formula A. 9987/-
- 7. Pay fixed in the Modified pay scale 656/-
- 8. No. of stages arrived at in the M.P.S. 3
- 9. Pay fixed in R.P.S. as on 1.6.91 on basis on corresponding stages in that scale 9987/-

FORMULA-B.

- Basic pay on 31.5.91 652-00
- Index pay 18-00
- 5% adhoc increase 33-00
- 10% adhoc increase 66-00
- Dearness increase =200. 200-00
- Total:- 969-00
- ⓧ Increase of Rs. 100 100-00
- Total;- 1069-00
- 10. Pay fixed in R.P.S. on 1.6.1991. 1076-00
- 11. Pay admissible as on 1.6.1991. 1076-00
- 12. Advance increments allowed on higher qualification(if any). -
- 13. Date of next increment 1.12.1991.

[Signature]
DRAWING & DISBURSING OFFICER.

PAY FIXATION PROFORMA UNDER REVISED
PAY SCALES RULES, 1991.

14

1. Name & Designation M. Mahmood Rahim Chaudhary
2. Existing pay Scale 600-13-860
3. Modified pay scale 605-17-860
4. Revised pay scale 920-26-1310
5. Pay on 31.5.1991 652/2
6. Pay fixation made under Formula A 9987/2
7. Pay fixed in the Modified pay scale 656/2
8. No. of stages arrived at in the M.P.S. 3
9. Pay fixed in R.P.S. as on 1.6.91 on basis on corresponding stages in that scale 9987/2

FORMULA-B.

- | | |
|------------------------|----------------|
| Basic pay on 31.5.91 | <u>652-00</u> |
| Index pay | <u>18-00</u> |
| 5% adhoc increase | <u>33-00</u> |
| 10% adhoc increase | <u>66-00</u> |
| Dearness increase =200 | <u>200-00</u> |
| Total:- | <u>969-00</u> |
| ₹ Increase of Rs.100 | <u>100-00</u> |
| Total:- | <u>1069-00</u> |
10. Pay fixed in R.P.S. on 1.6.1991. 1076-00
 11. Pay admissible as on 1.6.1991. 1076-00
 12. Advance increments allowed on higher qualification(if any). -
 13. Date of next increment 1.12.1991.

DRAWING & DISBURSING OFFICER
PESHAWAR.

Office of the Accounting Officer
M.W.F.P. Peshawar.
Pay Band in the Revised Pay Scales 1991
of Rs. 920-26-1310 / 1
● Re. 1076/2 M.W.F.P. 1-6-1991
With Next Increment on 1-12-1991

Accounting Officer
M.W.F.P. Peshawar.

حکومت پاکستان



قومی شناختی کارڈ
17301-2539181-5



نام: محمد رحیم
پنس: مرد
والد کا نام: فضل رحیم

شناختی طاقت: دائمی ہائر پرائمری لکھن وٹم
تاریخ پیدائش: 1964

دستخط

دستخط سربراہ

137-38121

محمد رحیم

محمد رحیم

شناختی طاقت: دائمی ہائر پرائمری لکھن وٹم
تاریخ پیدائش: 1964
کارڈ نمبر کی صورت میں شناختی طاقت اور شناختی کارڈ کے خلاف ہیں۔
مقررہ کارڈ کے برعکس ہائیڈرو گرافک پینسل سے لکھی گئی ہیں۔

شناختی نمبر: 17301-2539181-5
خانہ نمبر: U6W2WL



پیدائش: 28/04/2006

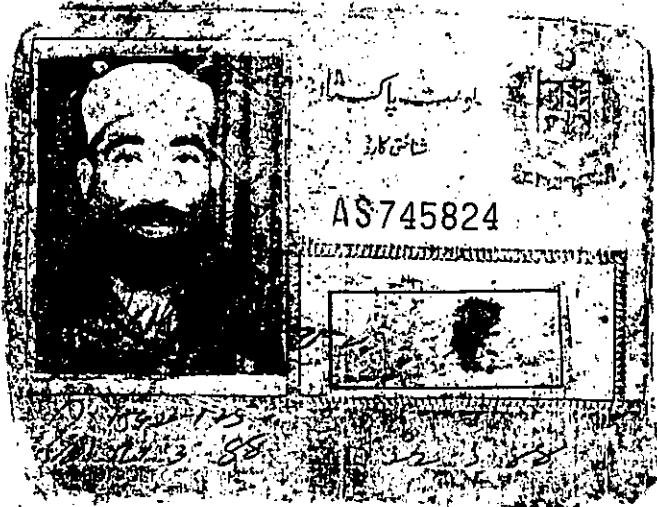
نسل: مسلح ہتھیار

پیدائش: 31/03/2014

13788219767

پیدائش: 28/04/2006

نسل: مسلح ہتھیار



AS745824

(16)

IN THE COURT OF SENIOR CIVIL JUDGE, PESHAWAR

Civil Suit No. _____ /2020

Muhammad Raheem S/O Fazal Raheem R/O Shagyali Bala Road, House
No 1, P.O Box Shagyali Payan, Teh: & Distt: Peshawar.

..... **Plaintiff**

V E R S U S

1. Secretary to Health Department, Civil Secretariat, Peshawar

2. District Health Officer, Town II, Peshawar

3. Director General, A G P R, Peshawar Division, Peshawar

..... **Defendants**

4. Chairman NADRA, Islamabad.

5. Director General, NADRA, Islamabad.

6. Regional Director NADRA, Head office, Hayatabad, Peshawar

..... **Preforma Defendants**

SUIT FOR:

A. Declaration to the effect that the plaintiff's actual date of birth is 01-01-1964 but the defendants No 1 - 3 have wrongly incorporated as 01-07-1958²⁰ and are reluctant to incorporate the correct Date of Birth as 01-01-1964 in the plaintiff's Service Record and such act of defendants No 1 - 3 are illegal, without lawful authority and is ineffective upon the rights of the plaintiff and may be declared as such.

B. Mandatory / Directory injunction to the defendants No 1 - 3 that the defendants No 1 - 3 may kindly be directed to incorporate plaintiff's correct date of birth in their entire record.

C. Permanent / Perpetual injunction against the defendants No 1 - 3 that the defendants No 1 - 3 may permanently be restrained from illegal act of not incorporating plaintiff's date of birth in their entire record.

Value for the purpose of Court Fee and Jurisdiction:

Relief "A" is..... Rs.1000/-
 Relief "B" is..... Rs.2000/-
 Relief "C" is..... Rs.2000/-

Cause of action accrued to the plaintiff against the defendants a few days ago when the defendants finally refused to incorporate plaintiff's Date of Birth.

Respectfully Sheweth:



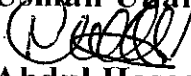
1. That the forefather as well as the plaintiff are the citizen / national of Pakistan by birth and are residents of Shagyali Bala Road, House No 1, P.O Box Shagyali Payan, Teh: & Distt: Peshawar. (Copies of CNIC are annexed)
2. That the plaintiff and his forefathers were / are illiterate and have no educational background.
3. That the plaintiff joined the health department on 09/06/1987 as Chowkidar. (copy of service ^{card, as} certificate / record are annexed)
4. That the plaintiff actual date of birth is 01/01/1964 where the defendants No 1 – 3 have wrongly incorporated as 01/07/1958. ^{and} which is mention in the CNIC of the plaintiff.
5. That, being citizen / national of Pakistan, by birth, it is the fundamental and Constitutional rights of the plaintiff's to have actual and correct service record.
6. That the plaintiff have filed serval application to the DDHO and MO – BHU of Jogani Town II Peshawar but in vein. (Copy of Application is attached)

- 7. That the defendants are legally and morally bound to incorporate the correct to the plaintiff, being the citizen / national of Pakistan.
- 8. That cause of action accrued to the plaintiff is within the jurisdiction of this Hon'ble court, hence this Honorable Court has got jurisdiction to adjudicate upon the matter.
- 9. That cause of action and value for the purpose of court fee and jurisdiction are correctly mentioned in the heading of the plaint.

It is, therefore, most humbly prayed that a decree as prayed for in the heading of the plaint may please be granted/ passed in favour of the plaintiff against the defendants with costs.

Any other relief under the facts and circumstances of the case, and this honorable court deems appropriate, may also be granted in favor of the plaintiff against the defendants.

Through

Plaintiff

 Nasrumin Allah

 Usman Ullah

 Abdul Haseeb
 Advocates, Peshawar

Date: Aug 24, 2020


VERIFICATION:

Verified on oath that the contents of this **Plaint** are true and correct to the best of my knowledge and belief.

VERIFIER

NOTE:

As per information supplied to me by my client, no such like plaint/suit has earlier been filed before this Honourable Court regarding the instant matter.


ADVOCATE

Order..01
24.08.2020

2

Instant civil suit has been filed by counsel for the plaintiffs who admitted the contents of the plaint as true and correct. It be registered. Defendants be summoned for

16/1/2020.

Nazia Parveen,
Civil Judge-IX/Duty Judge,
Peshawar

Order..02
16.10.2020

Plaintiff through counsel present. Defendants not present. Process not issued. Moharrir is warned to be careful in future. Fresh process be issued against defendants for

26/11/2020.

Nazia Parveen,
Civil Judge-IX,
Peshawar

133

Handwritten notes in Urdu, including dates like 26/4/20 and 26/11/2020.

Large handwritten notes in Urdu, including dates like 06/1/2021 and 26/11/2020.

NAZIA PARVEEN
Civil Judge IX
Peshawar

ATTESTED

21 JUNE 2021

(Examiner)
District Court Peshawar

4 - رقم 1501 - 20/1/21
 06/1/2021
 3
 20/1/21
 20/1/21

Postscript:
 06/01/2021

Later on counsel for plaintiff moved an application for restraining the defendant from retiring the petitioner, placed on file.

145

Notice of the application be issued to the defendant for date fixed.

Nazia Parveen,
 Civil Judge-IX,
 Peshawar

0-5
 20/1/21
 قریبین بذریعہ وکلاء ملحقہ
 جواب دعویٰ منجانب مدعا علیہ 1-2 درجہ شد
 انفرادی لیٹر منجانب نادرا درجہ شد۔ مثل
 برائے جواب دعویٰ منجانب مدعا علیہ 1 و 2
 آئینہ 10 2/21 کو پیش ہو۔

ATTESTED
 21 JUN 2021
 (Examiner)
 District Court Peshawar

مدعی نذیر علی وکیل ملزم -
مدعی علیہ نذیر علی نمائندہ کان ملزم -
0-6.
10/2/21.

3

برائے جواب دہی منیاب مدعی علیہ
4 تا 6 و ذمہ دہی طلب شدہ - قطعی
مدعی دہی جانکہ مثل برائے جواب -
دہی منیاب مدعی علیہ 4 تا 6 آئینہ
33/21 کو پیش ہو۔

NAZIM ARVEEN
Civil Judge IX
Peshawar

Postscript
10/2/2021

Later on counsel for plaintiff
moved an application for suspension
of order No. 19333-38 dated
9/12/2020 issued vide No. 19333-38.

Notice of application be issued to
opposite party for date fixed.

File to come up on date fixed.

ATTESTED

21 JUN 2021
(Examiner)
District Court Peshawar

NAZIM ARVEEN
Civil Judge IX
Peshawar

0-7.
3/3/21.

مذکورہ بین بدو ریم و کلا دھلا

جواب در فراموش سیٹیک مدد علیہ 6
در نقل شد - مدد علیہ برائے 3
طلب شد - ملک در قائل برائے

جواب در فراموش مدد علیہ برائے 3
تا 25/3/21 کو پیش ہو۔

Civil Judge IX
Peshawar

0-8-
25/3/21.

مذکورہ بین بدو ریم و کلا دھلا

برائے جواب در فراموش مدد علیہ
برائے 3 ملک طلب شد - ملک ملک
کار نقل برائے جواب در فراموش
تا 19/4/21 کو پیش ہو۔

NAZIA PARVEEN
Civil Judge IX
Peshawar

ATTESTED

21 JUN 2021

(Examiner)
District Court Peshawar

0-9.
19/4/21.

مذکورہ بین بدو ریم و کلا دھلا - جواب

در فراموش در نقل شد - ملک برائے مدد علیہ
تا 26/5/21 کو پیش ہو۔

NAZIA PARVEEN
Civil Judge IX
Peshawar

Order...10
26/05/2021

(4)

Parties through counsel present. Arguments heard.

File to come up for order on 15/6/21.

Nazia Parveen
Nazia Parveen
Civil Judge-IX,
Peshawar

Order.....11
15.06.2021

جوائز کوٹہ 15/6/21
اعلیٰ درجہ کا قلم و کتاب نام بحال
عشان اللہ ایوب صاحب
15/6/21
Civil Judge IX
Peshawar

1. Plaintiff through counsel present. Defendants No.1 to 3 through their representative present.
2. Today date was fixed for order on application of temporary injunction and maintainability of instant suit.
3. This order pertains to the decision of point of maintainability. Arguments of the learned counsel for parties were heard and record was perused.
4. Perusal of record reveals that plaintiff has instituted the suit for declaration and mandatory cum perpetual injunction for correction of his date of birth in the plaintiff's service record and CNIC. Defendants appeared before the court and submitted written statement.
5. Plaintiff is seeking rectification of his date of birth in his service record and it is well established from the available record that plaintiff is the employee in the Health

ATTESTED

21 JUN 2021
(Examiner)
District Court Peshawar

15/6/21
(کونسلر)
Civil Judge IX
Peshawar

(order No.11 dated 15.06.2021 continued)

4

Department which is government institution. Mode of correction in the date of birth of civil servant is provided under the Civil Servants Rules, 1973 which was the part of the terms and condition of the service of a civil servant. Correction in the date of birth by a civil servant could not be done through a civil suit. Civil Servant has to approach Service Tribunal for alteration in his date of birth.

- 6. Thus, for the above reasons, the plaint is hereby returned to the plaintiff to file his suit at the appropriate forum having jurisdiction. Moharrir of the court is directed to do the needful. Original plaint and wakalat-nama be returned to plaintiff.
- 7. This file be consigned to record room after its necessary completion.

Announced:
15.06.2021




CERTIFIED TO BE TRUE COPY

(Examiner)
Copying Agency District Court
Peshawar.

Nazia Parveen
Nazia Parveen,
Civil Judge-IX,
Peshawar

NAZIA PARVEEN
Civil Judge IX
Peshawar

No.	25858	20858
Dated of An...	21/6/21	
Name of...	...	
Word...	P-15	
Fec...		
...		
...	21/6/21	
...	21/6/21	

50 روپے	36323	  
ایڈوکیٹ: <u>Usman Akhbar</u>		
بار کونسل ایسوسی ایشن نمبر: <u>BC-17-7413</u>		
رابطہ نمبر: <u>0334-9205211</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سید سراج اللہ کستور

منجانب:	دعوی: <u>Declaration</u>
محمد رحیم ولد فضل رحیم سید شتعالی پالا مقامی ایکٹو کمیٹی پ.و. شتعالی پالا اور بنام سکریٹری بساؤ و خیر	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ محمد فضل رحیم / آن مقام کستور کیلئے لعرصہ ارضہ محمد الحسن علیہ السلام کی طرف سے مقرر اور دلخواہ 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 برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخے منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 08-2020-0

مقام کستور کے لیے منظور ہے۔

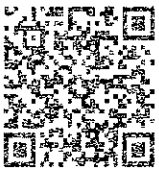
Accepted by

[Signature]

[Signature]

[Signature]

نوٹ: اس وکالت نامہ کی خودنوٹ کاپی نام قابل قبول ہوگی۔



وفاقیہ ٹی بی پی این شیاں جمعیۃ الباریہ

نشانی: _____

پتہ: _____

تلفون: _____

تاریخ: _____

نام: _____ پتہ: _____ تعلقہ: _____ صوبہ: _____ پتہ: _____	نام: _____ پتہ: _____ تعلقہ: _____ صوبہ: _____ پتہ: _____
---	---

محکمہ تعلیم

تعلقہ _____، صوبہ _____، پاکستان

میں نے اپنے والدین کی طرف سے تعلیم کے لیے درخواست دی ہے۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

میں نے ریاضہ تعلیم حاصل کیا ہے اور اس کے دوران میں نے بہتر نتائج حاصل کیے ہیں۔

تاریخ: _____

BEFORE THE COURT OF CIVIL JUDGE IX, PESHAWAR

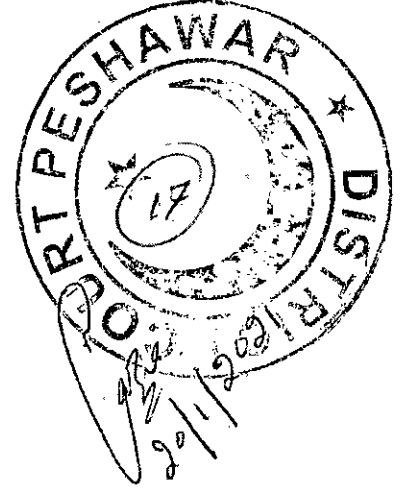
CIVIL SUIT No 303/1

Muhammad Raheem

-----Plaintiff

Versus

- 1: Secretary Health, Govt of Khyber Pakhtunkhwa Peshawar.
- 2: District Health Officer Town-II Peshawar.
- 3: Director General AG PR , Division, Peshawar.
- 4: Chairman NADRA Islamabad.
- 5: Director General NADRA, Islamabad .
- 6: Regional Director NADRA , Head office, Hayatabad ,Peshawar.



-----Defendants

WRITTEN STATEMENT ON BEHALF OF RESPONDENTS No.01 to 02

Respectfully Shewith ,

Preliminary Objections.

- The plaintiff has neither got any cause of action nor locus standi to file the instant suit.
- The plaintiff has not come to the court with clean hands.
- The plaintiff is bad for non joinder and mis joinder of the necessary parties.

Reply on facts:-

- A. Pertaining to record.
- B. No comments.
- C. The plaintiff joined health department as Chowkidar in BPS-01 scale (440- 10-640) vide office order No.9566-70/phmi/LRH dated 24-06-1987; which is attached as **Annexure-A**.

D. 100% incorrect.

As the plaintiff was appointed as Chowkidar by the Administrator of Lady Ready Hospital (Post graduate medical Institute) Peshawar dated 24-06-1987 which is ready attached as **Annexure-A** . Needless to mention that the plaintiff was not appointed by the defendants No.1&3.

- E. No comments.
- F. Pertaining to record.
- G. No comments.
- H. No comments.

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21 JUN 2021

(Examiner)
District Court Peshawar

District Court Peshawar

I. No answer on behalf of answering defendant.

It is pertinent to mention here that the plaintiff worked for several years after appointment in Lady Reading Hospital Peshawar & transferred to District Peshawar in 1991 (as attached Annexure-B) after that he served in BHU Jogani District Peshawar till now.

It is therefore, most humbly prayed that the suit of the plaintiff be dismissed with cost throughout.

18

Respondent No.1 & 2

Signature
Secretary Health Through
Deputy District Health Officer
Town-II, Peshawar.

Signature
20/11/2021

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21 JUN 2021

(Examiner)
District Court Peshawar

Annexure A

9	10	11	12	13		14	
				Leave			
				Nature and duration of leave taken	Allocation of period of leave or average pay upto four months for which leave salary is debit to another Government	Signature of the head of the office or other attesting officer	
					Period		
Signature and designation of the head of the office or other attesting officer in columns 1 to 8							
Date of termination of appointment							
Reason of termination (such as promotion, transfer, dismissal, etc.)							
Signature of the head of the office or other attesting officer							
Reference to any recorded punishment or censure, or reward or praise of the Government Servant.							
Appointed as Chowkidar in BPS-1 scale (440-10-640) vide office order NO. 9566-70/09MI/LRH Dated: 24-6-87.							
DEAN Post Graduate Medical Institute & Administrator, Lady Reading Hospital, Peshawar.							
Pay fixed @ Rs. 600...../P.M. in B.P.S. in the revised Pay Scale w.e.f. 1-7-1987.							
Service Verified up to & for 30-6-87 AN							
DEAN Postgraduate Medical Institute & Administrator L. R. H. Peshawar.							
Administrator Lady Reading Hospital Peshawar.							
annual increment Allowed							
Service Verified up to & for 30-11-87 AN							
Administrator Govt L.R.H. Peshawar.							
Administrator Lady Reading Hospital Peshawar.							
annual increment Allowed							
Service Verified up to & for 30-11-88 AN							
Administrator Govt L.R.H. Peshawar.							
Administrator Lady Reading Hospital Peshawar.							
annual increment Allowed							
Service Verified up to & for 30-11-1989 AN							
Deputy District Health Officer Govt L.R.H. Peshawar.							
Administrator Lady Reading Hospital Peshawar.							
annual increment Allowed							
Service Verified up to and for 30-11-1990 AN							
Administrator Govt L.R.H. Peshawar.							
Administrator Lady Reading Hospital Peshawar.							
Days E/Leave.							
Leave/extra Ordinary Leave							
Order No. 7334-38 Dt: 23/4/90							

(29)

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant

600-13-860 (BMS-1)

Chowkidar

W.P. Peshawar

Temp.

Pay Rs 652/- P.M.

1¹²/₉₀ P.M.

OFFICE OF THE ACCOUNTANT GENERAL
 N. W. F. P. PESHAWAR
 Authorized in Revised Basic Pay Scales
 Rs. 600-13-860 (B.S. No. 1)
 Rs. 600/- P.M. w.e.f. 1-7-91
 with next increment on 1-12-91.

[Signature]

ACCOUNTANT GENERAL

[Signature]

920-26-1310

"

Pay Rs 1076/- P.M.

1¹²/₉₁ P.M.

Pay Rs 1102/- P.M.

1¹²/₉₁ P.M.

Office of the Accountant General
 N. W. F. P. Peshawar.
 Authorized in the Revised Pay Scales 1991
 Rs. 920-26-1310
 Rs. 1076/- M/W.E.F. 1-6-1991
 With Next Increment on 1-12-1991

[Signature]
 ACCOUNTANT GENERAL
 N. W. F. P. Peshawar

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

1. Name

Mohammad Rekin

2. Race

Muslim

3. Residence

Village Gatti Poya P.O. Nalayi
Tehsil and Distt. Peshawar.

4. Father's name and residence

Fazli Rekin

As above.

5. Date of birth by Christian era as nearly as can be ascertained

1-7-1958

6. Exact height by measurement

5-6

7. Personal marks for identification

A mole on back of neck.

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger.

Ring Finger

Middle Finger

Fore Finger

Thumb.

Rekin
Deputy District Health Officer
Town-2 Peshawar

9. Signature of Government servant.

Rekin

10. Signature and designation of the Head of the Office, or other Attesting Officer.

Sy. Seshu DEAD
Post Graduate Medical Institute
& Administrator, Lady Reading
Hospital, Peshawar.

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	if officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
<p>440-10-646 (BPS-1) Chowkidar</p> <p>L.R.H. PAMI</p>	<p>Temporary</p>		<p>Pay Rs 440/- PM</p>			<p>24/8/87</p>	
<p>600-13-862 (BPS-1) Chowkidar</p> <p>L.R.H. Pashwan</p>						<p>1/8/87</p>	
<p>711</p>						<p>12/8/87</p>	
<p>711</p>						<p>12/8/87</p>	
<p>711</p>						<p>12/8/87</p>	
<p>711</p>						<p>12/8/87</p>	

9	10	11	12	13		14	15
				Leave			
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8		Reason of termination (such as promotion transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Period	Government to which debitable		
<p><i>[Signature]</i> Administrator Govt. Lady Reading Hospital Peshawar.</p>			<p>Annual Increment allowed <i>[Signature]</i> Admin. Govt. L.R.H. Peshawar.</p>			<p>Service Verified upto date for 30-11-1990 <i>[Signature]</i> Admin. Govt. L.R.H. Peshawar.</p>	
		<p>Transferred to B.H.U. Takhtabad under Dt. Divisional Director Health Service NWFP Peshawar, vide DDO order No. 4022-27/Adminn. Dt. 8/5/91 And L.R.H. No. 9138-41/LRH Dt. 13/5/91</p>				<p>Service Verified wef. 12/1/90 to 13/5/91 ✓</p>	
		<p><i>[Signature]</i> Administrator Govt. Lady Reading Hospital Peshawar.</p>				<p><i>[Signature]</i> Administrator Govt. Lady Reading Hospital Peshawar.</p>	
		<p>Pay fixed as per Revised pay rules 1991-</p>					
<p><i>[Signature]</i> District Health Officer Peshawar</p>			<p><i>[Signature]</i> District Health Officer Peshawar</p>			<p><i>[Signature]</i> Deputy District Health Officer Town-2 Peshawar</p>	
<p>30/11/91 AN</p>			<p>Annual Increment allowed</p>			<p>Service Verified. up to 30/11/91</p>	
<p><i>[Signature]</i> District Health Officer Peshawar</p>			<p><i>[Signature]</i> District Health Officer Peshawar</p>			<p><i>[Signature]</i> District Health Officer Peshawar</p>	

33

10-2-2021

8

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 if officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
<u>920-26-1310</u> Chowkidar	Temp.		Pay Rs. 1127/- Pm			1-12-92	
<u>920-26-1310</u> Chowkidar			Pay Rs. 1154/- Pm			1-12-92	
<u>1245-35-1770</u> Tahsiladar			Pay Rs. 1564/- Pm	✓		1-12-92	
<u>1245-35-1770</u>			Pay Rs. 1564/- Pm	✓		1-12-92	

1984
Office of The Accountant General,
N.W.F.P. Peshawar
Pay fixed in the revised basic pay scales-1994
of Rs. 1245-35-1770. (B. I.)
@ Rs. 1560/- P.M.W.E.F. 1-6-1994
with next increment on 1-12-1994
Accounts Office,
Pay Fixation Party N.W.F.P. Peshawar

E" (34)

IN THE COURT OF CIVIL JUDGE, PESHAWAR

Muhammad Raheem
S/O Fazal Raheem
CNIC#17301-2539181-5

(Plaintiff)

VS

(28)

Secretary Health and others


(Defendants)

APPLICATION FOR DELETION OF NAME OF DEFENDANT #4 to 6

Respectfully Sheweth:

1. That the plaintiff applied for CNIC in the year 2006 from NRC Peshawar Cant and obtained SCNIC# 17301-4240543-5 and renewed his CNIC in the year 2015 and entered his date of birth 00-00-1964, according to policy of Nadra which is consider as 01-01-1964 which is correctly recorded in his CNIC data. (Record attached).
2. That no relief has been sought from the defendant# 4 to 6, therefore the impleading of defendant# 4 to 6 in the calendar of defendants is un-usefull.
3. That the plaintiff has no right to suit against the NADRA.

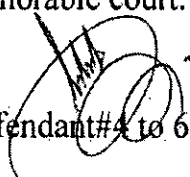
It is therefore humbly prayed on acceptance of this application the name of the defendant# 4 to 6 may please be deleted.


Defendant#4 to 6

Date: 03/03/2021

Verification: It is verified that the contents of the written statement are true and correct and nothing have been concealed from this honorable court.

ATTESTED


Defendant#4 to 6

21 JUN 2021

(Examiner)
District Court Peshawar

GOVERNMENT OF PAKISTAN
MINISTRY OF INTERIOR
HEADQUARTERS NATIONAL DATABASE
AND REGISTRATION AUTHORITY (NADRA)

NADRA. 10/2/05-(Legal)

Islamabad, 21st March, 2005.

OFFICE ORDER

29

Pursuant to Section 37 of the National Database and Registration Authority Ordinance, 2000, (VIII of 2000), the Authority has been pleased to authorize and accordingly delegate its powers to all Assistant-managers (Legal) Working in Headquarters NADRA, Provincial Headquarters NADRA and Regional Headquarters NADRA to represent NADRA, to prosecute, defend in suits and proceeding, to sign and verify plaints pleadings, applications, petitions or documents before any court or tribunal; to appear, withdraw and receive documents from such court and tribunal; to apply for inspection and inspect documents and record; to obtain copies of documents and papers etc. To do generally, all acts relating to courts and tribunals except the Supreme Court of Pakistan.

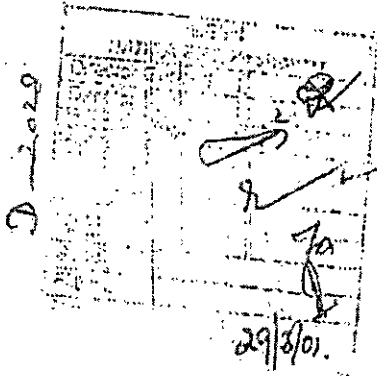
Muhammad Rahim
vs
NADRA etc

Assistant Director Legal
NADRA RHO Peshawar
Khyber Pakhtunkhwa

[Signature]
Director Legal
For Chairman NADRA
[Signature]

Distribution:

- 1. All DGs PHQs/RHQs NADRA.
- 2. All DGs HQs NADRA. For information.



ATTESTED

2 / JUN 2021

(Examiner)
District Court Peshawar



National Database and Registration Authority
Research and Development

homepage regtrack change password family tree minor info personal info logout

DRO/SRC

Form No PH00281975
DRO/NSRC Peshawar cantt
CNIC/NIC No. 137-88-219757
RG4 Book/Token 99
RG4 Receipt N/A
Fee Deposit 75
Application Type New NIC
Urgent/Normal Normal
Booking Date 18-04-2006

DE/SRC

Status
Data Entered at NSRC 18-04-2006
Data sent for Consolidation Batch No: 24-04-2006
100100-06-0221-N

Data Warehouse

DW Loading Date 13-11-2015
Batch No. 504801022542
NIC No. 137-88-219757
NIC Processing Status p - Processed for CNIC
NIC Processing Date 13-11-2015
CNIC No. 17301-2539181-5
Expiry Date 2025-12-04
Export Batch 20151204120n
Export Status E - Exported
Export Date 04-12-2015

Printing Department

Status Date
Printing Data Not Available

Distribution

Status Date
Distribution Data Not Available

Personal Information

Name محمد رحيم
Father Name فضل رحيم
Mother Name حسن زری
Date of Birth ~~00-00-1964~~
House/Flat No. 1
Mohallah/Street null
Sector null

Neighborhood **null**

Further Details شغالی بالا
روڈ

City/Village جوگنی

Tehsil/Sub-Division پشاور 31

Post Office شغالی
پایان

Postal Code **null**

District/Country پشاور

38



National Database and Registration Authority
Research and Development

homepage regtrack change password family tree minor info personal info logout

DRO/SRC	DE/SRC	Data Warehouse
Form No	PH00281975	Status
DRO/NSRC	Peshawar cantt	Date
CNIC/NIC No.	137-88-219757	DW Loading Date
RG4 Book/Token	99	Batch No.
RG4 Receipt	N/A	NIC No.
Fee Deposit	75	NIC Processing Status
Application Type	New NIC	NIC Processing Date
Urgent/Normal	Normal	CNIC No.
Booking Date	18-04-2006	Expiry Date
		Export Batch
		Export Status
		Export Date

Printing Department	Distribution	Personal Information
Status	Status	Name
Date	Date	Father Name
Card Printed and Packed Box No: 1356461	Card received at Distribution	Mother Name
Card Sent to Distribution Box No: 1356461	Card sent to Dist. Point CDC-Peshawar	Date of Birth
	Card received at Dist. Point CDC-Peshawar lying at pigeon hole CQT at location 380	House/Flat No.
	Card Accepted by Applicant KHADIJA	Mohallah/Street
	Date	Sector

(39)

BIBI from CDC-
Peshawar

2006

Neighborhood null

Further Details شغالی بالا
روڈ

City/Village جوگنی

Tehsil/Sub-
Division

پشاور (33)

Post Office شغالی
پایان

Postal Code null

District/Country پشاور



Family Tree

34

Note: Below are family tree of your citizen number.



Alpha Family Beta Family Gamma Family

Search:

Relation	Photograph	Citizen Number	Type	Name	Father Name	Mother Name	Date of Birth	Status	Action
Self	Photo	17301-*****-5	CNIC	محمد رحیم	فضل رحیم	حسن زری	09/01/1964	Processed	Q
Wife	Photo	17301-*****-2	CNIC	نسیم اختر	عبدالغفار	مہر افروز	09/01/1966	Processed	Q
Daughter	Photo	17301-*****-2	CNIC	ولضحیٰ بی بی	محمد رحیم	نسیم اختر	09/01/1984	Processed	Q
Daughter	Photo	17301-*****-4	CNIC	لطیفہ بی بی	محمد رحیم	نسیم اختر	09/01/1985	Processed	Q
Son	Photo	17301-*****-9	CNIC To CNIC	احقر علی	محمد رحیم	نسیم اختر	1/2/1991	Processed	Q
Daughter	Photo	17301-*****-2	CNIC	ملینہ بی بی	محمد رحیم	نسیم اختر	16/2/1992	Processed	Q



41



 Tracking ID: 60480-UC254L
 Date: 25 Dec 2015 10:07:23 AM

نیشنل ذیابیطیس اینڈ رجسٹریشن اتھارٹی
 نیشنل ذیابیطیس اینڈ رجسٹریشن اتھارٹی

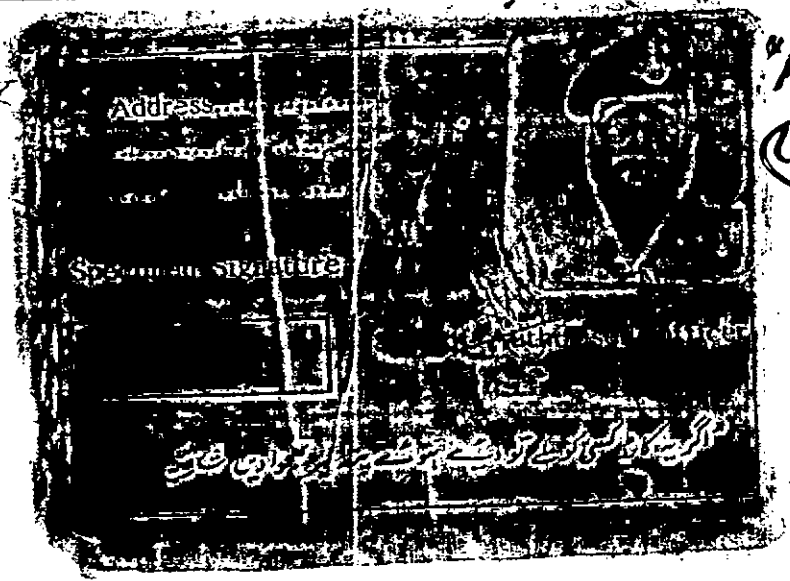
Token No: 28
 Charpancha

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Medical Officer
 UC B...
 03339327481-17301-77492421

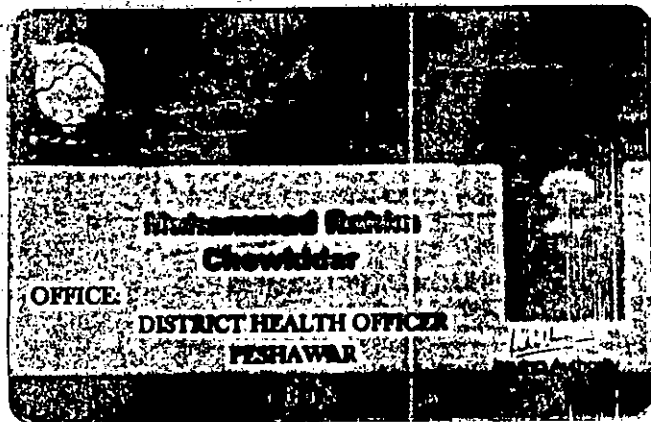
ڈاکٹر شہیر اللہ خان



"F"

(12)





Muhammad Razaq
Choudhary

OFFICE:

DISTRICT HEALTH OFFICER
PESHAWAR

Father/Husband Name:	Fazal Rahim		
CNIC No:	17301-2539181-5	Date of Birth:	01-01-1964
Mark of Identification:	Nil	Blood Group:	O+ive
Emergency Contact Number:	0313-9628629 BPS - 02		
Present Address:	BHU Jogan P.O. Shaghali Bala District Peshawar		
Note: For Information & Verification, Please contact D.			

کچھ اور محتاج ڈاکٹر ڈاکٹریٹ ہسپتال آفریڈی پشاور
 44

مکاتیب کے گزرائی ہوئے اساتذہ کی پندرہ
 1964ء سے - اہلیت سے روک دینے کے لئے
 سٹیٹ ہسپتال آفریڈی 58-7-1 سے لے کر
 پندرہ ہسپتال آفریڈی سے روک دینے کے لئے
 ڈاکٹر کے احکامات کے مطابق

OFFICE OF	THE DHO (H)	PESHAWAR
	Entry No. 3039	
	Date 29/07/2020	
	R. Date	
	*	

الحمد لله
 Accounts

ڈاکٹر کے احکامات کے مطابق
 ڈاکٹر



Inclosed to DHO Peshawar
 for further action
 DR. ZARIN KHAN AFRIDI
 DHO & MS
 Town II, Gara Tajik
 Peshawar

Forward to DDHO
 for further necessary
 action
 MEDICAL OFFICER
 Basic Health Unit
 Joghri Peshawar

**FACILITY BASIC INFORMATION
EMPLOYEE PROFILE**

"H" "A"

45



Form No: FI/EP/02-03/06-01

District: PESHAWAR

Reporting Month: 01-10-05

NEW

UPDATING

This form should be filled and returned to the District Information Technology Office by all government employees. Please start by making the appropriate selection on the left top corner.

1. Operational Tier: District Tehsil Functionary

2. Group: Chawki

3. Office: Executive Officer Health

4. Facility: B.H.U. (Civil)



Personal Information

5. Full Name: MUHAMMAD RAHIM

6. Gender: M F

7. Date Of Birth (dd/mm/yy): 01-01-1964

8. Domicile: Peshawar (NW-FP)

9. NIC No (old): 137-88-219757

10. CNIC No (new):

11. NT No (tax payer only):

12. Marital Status: Married Unmarried

13. Dependants: 4

14. Spouse Employment Status: Unemployed Government Private Self-employed

Service Information

15. Service Status: Permanent Daily wages Contingent paid Ad-hoc Contract

16. Appointment Date (dd/mm/yy): 09-06-1987 17. Retirement Date (dd/mm/yy): 01-01-2024

18. Cadre: District

19. Computer Literate: Y N

20. Field of specialization: Chawkiedar

Present Posting

21. Designation: Chawkiedar

22. Joining Date (dd/mm/yy): 09-06-1987

23. BPS: 01 24. Increments: _____

25. Basic Pay: Rs. 3515 26. Allowances: Rs. 1802 27. Other: Rs. _____

0313-9628629
06/10/05



OFFICE OF THE DISTRICT HEALTH OFFICER,
PESHAWAR
Phone No. 091-9212911

(27)

OFFICE ORDER

Mr. Muhammad Rahim S/O Fazal Rahim working as Chowkidar attached to BHU Joganj Peshawar under the control of undersigned hereby stands retired from Government service with effect from 30/06/2018 on the age of superannuation. According to his service book, his date of birth is 01/07/1958 and date of appointment is 24/06/1987.

He is also entitled for 365 days encashment in lieu of 365 days LPR and necessary sanction is hereby accorded to this effect.

Sd/XXXXXXXXXX
District Health Officer
Peshawar

No. 19333-38/EDOH/IDCH

Dated Peshawar the: 29/07/2020

A copy is forwarded to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director General Health Services Khyberpakhtunkhwa Peshawar.
3. DDHO Town II Peshawar.
4. Medical Officer BHU Joganj Peshawar.
5. Accounts Section DHO Office Peshawar.
6. Mr. Muhammad Rahim S/O Fazal Rahim

For information and w/action

District Health Officer
Peshawar

ATTESTED

21/07/2021

(Examiner)
District Court Peshawar



ATTENDANCE

REGISTER

HAPPY New Year (17-1)



Attendance Role For the Month JANUARY 2019

No	Name and Designation																					Total Late		Casual Leave		Holiday		Remarks											
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month
(1)	Dr. Rajeev Medical Officer	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	Went on EOL	Went on EOL					Went on EOL - 1/1/19 vide SH notice SO(6)4-T/3-18/2019 dated 8 Feb 2019
(2)	Mr. Shaik Ali	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(3)	Mr. Tahir Zeb (DHC) Tec Epi	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(4)	Mr. Ikram Epi (TECH)	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(5)	Mr. Muleeb (DHC) Epi Team	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(6)	Miss. Kauser Imam (LHS)	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(7)	Mr. Zeshan (word orderly)	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(8)	Mr. Ibrahim (Beshri)	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(9)	Mr. M. Raheem (NIGHT WATCHMAN)	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							
(10)	Mr. Raza Ullah (Driver)	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR							

~~Signature~~
 MEDICAL OFFICER
 Basic Health Unit
 Jagani, Beshriwar

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ATTENDANCE REGISTER



Attendance Role For the Month: February 2019

No.	Name and Designation															Total Late		Casual Leave's		Holiday		Remarks																		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		21	22	23	24	25	26	27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month	
1)	MR SHARIKAT ALI																																							
2)	MR TAHIR Z.B (DHC) Tec Epi																																							
3)	MR Kamran Epi (Tech)																																							
4)	MR NAVEED (DHC) (Epi Tech)																																							
5)	MISS. KAUSAR ILMU (LMS)																																							
6)	MR DASTAN (ward order)																																							
7)	MR Mohdhan (Bas.H)																																							
8)	MR M. RAHMAN (Night Watchman)																																							
9)	MR RAZA ULHAQ (Driver)																																							

[Signature]
 MEDICAL OFFICER
 Basic Health Unit
 Jogam Pashawar

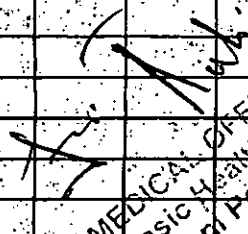


ATTENDANCE REGISTER



Attendance Role For the Month 07 2019

No	Name and Designation	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total Late		Casual Leave		Holiday		Remarks	
																																	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month		
①	MR. SHAUKAT ALI MI																																							
②	MR. TAHIR ZAR (PHC Tech Em)																																							
③	MR. IKRAM ULLAH (EP Tech)																																							
④	MR. MUIEER B (PHC Tech Em)																																							
⑤	MISS KAUSAR IMAM (LHS)																																							
⑥	MR. ZAHAN AHMED (Gen. Duty)																																							
⑦	MR. IHTISHAM (Bash Ti)																																							
⑧	MR. M. RAHEEM (Night Watch)																																							
⑨	MR. RAZA ULLAH (Driver)																																							


 MEDICAL OFFICER
 Basic Health Unit
 Jogan Peshawar

Scanned with CamScanner





ATTENDANCE REGISTER



Attendance Role For the Month MAY 2019

No	Name and Designation	Date																				Total Late		Casual Leave		Holiday		Remarks													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month		
(1)	Mr. Shaukat Ali (MT)																																								
(2)	Mr. Tariq (DHC Tech Epi)																																								
(3)	Mr. Mujeeb (DHC Tech Epi)																																								
(4)	Miss. Kausar Imam (LHC)																																								
(5)	Mr. Ikrar (Epi Tech)																																								
(6)	Zasham Ahmed (General Duties)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P										
(7)	Mr. Ibrahim (Bashri)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P										
(8)	Mr. Raja Ullah (Driver)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P										
(9)	Mr. M. Raza (General Duties)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P										

(Signature)
 MEDICAL OFFICER
 Basic Health Unit
 Jhansi Peshawar



ATTENDANCE REGISTER



Attendance Role For the Month: **JUNE** 2019

No	Name and Designation	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total Late		Casual Leave		Holiday		Remarks		
																																	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month			
(1)	MR. SHAUKAT ALI (MT)																																								
(2)	MR. TAHIR ZAR (PhC Tech)																																								
(3)	MR. IKRAM ULLAH (Ph Tech)																																								
(4)	MR. ANWAR (PhC Tech)																																								
(5)	MISS. KAUL INAM (L.H.S)																																								
(6)	Qasim Ahmad (Caretaker)	P	P																																						
(7)	MR. Ishaq (Bashri)	P	P																																						
(8)	MR. RAZA ULLAH (Driver)	P	P																																						
(9)	MR. MOHAMMED RASHEED (Night watchman)	P	P																																						

MEDICAL OFFICER
Basid Health Unit
Jogani Peshawar





ATTENDANCE

REGISTER



Attendance Role For the Month: JULY 2019

No	Name and Designation																				Total Late		Casual Leave		Holiday		Remarks											
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25		26	27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month
1	Mr. Siskat Ali MT	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
2	Mr. Taha RES PHC Epi	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
3	Mr. Ikramullah PHC Epi	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
4	Mr. Muliabur Rahman PHC Epi	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
5	Miss Kaibus Juan LHS	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
6	Mr. Zakhir Ahmad ward ordiat	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
7	Mr. Ibrahim Resat	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
8	Mr. Moleamad Rahim Nigid chawada	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							
9	Mr. Raza Ullah Driver	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP	PP							

MEDICAL OFFICER
 Basic Health Unit
 Jorani Pashawari





ATTENDANCE

REGISTER

Attendance Role For the Month **AUGUST** 2019



No	Name and Designation																					Total Late		Casual Leave		Holiday		Remarks													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month		
1	MR. SUGIKAT ALI MPP																																								
2	MR. Fahri Zeb P.H.C Epi																																								
3	MR. IKRAM ULLAH P.H.C Epi																																								
4	MR. MUIJEER-ur-Rehman (P.H.C Epi)																																								
5	MISS Kaular Imam (Lits)																																								
6	MR. Zaarhan Ahmed (ward Orderly)																																								
7	MR. Ibrahim (Basni)																																								
8	MR. Mohammad Rahman (Night watchman)																																								
9	MR. Raza (Ullah) Driver																																								
10	MR. Jehan Dai Barber																																								

MEDICAL OFFICER
Basic Health Unit
Jogani, Beshawal





ATTENDANCE

REGISTER

Attendance Role For the Month: October 2019



No	Name and Designation	Total Late		Casual Leave		Holiday		Remarks
		Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month	
(1)	MR. SHAUKAT ALI (MT)	1	1					
(2)	MR. TARIQ ZUB (DHC Epi)	1	1					
(3)	MR. IKRAM ULLAH (DHC Epi)	1	1					
(4)	MR. MUBASHIR-UR-REHMAN (PHC Epi)	1	1					
(5)	MISS. KAUSAR HANM (LHC)	1	1					
(6)	MR. ZAKI AHMED (Community)	P	P	P	P	P	P	
(7)	MR. Ibraheem (Dshir)	P	P	P	P	P	P	
(8)	Mohammed Rehman (NIGHT watchman)	P	P	P	P	P	P	
(9)	MR. RAZIA ULLAH (Driver LHC)	P	P	P	P	P	P	
(10)	MR. AMJED ALI EPI Tech	1	1					

MEDICAL OFFICER
Basic Health Unit
Jogan, Peshawar



ATTENDANCE

REGISTER



Attendance Role For the Month of December 2019

No	Name and Designation																					Total Late		Casual Leave		Holiday		Remarks																								
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month													
1	MR. SHAUKAT ALI (NT)																																																			
2	MR. TAHIR Zeb (NT)																																																			
3	MR. AMID KHAN (EPI TECH)																																																			
4	MR. MUIJIB-UR-REHMAN (EPI TECH)																																																			
5	MR. ZESHAN AHAJ (W/Boy)		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P																																
6	MR. Ibraheem (Bach)		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P																																
7	MR. RAZA ULLAH (LHC Director)		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P																																
8	MISS. Kousar Imam (LHC)																																																			
9	MR. Anshamir Rehman (NIGHT WATCHMAN)		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P																																

MEDICAL OFFICER
 Baski / Peshawar
 Jagan Peshawar





ATTENDANCE REGISTER

HAPPY NEW YEAR



Attendance Roll For the Month

January 2020

2017

No	Name and Designation	Total Late		Casual Leave		Holiday		Remarks
		Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month	
(1)	Mr. Muhammad Ali (MT)							
(2)	Mr. Tahir Zeb Khan (MT)							
(3)	Mr. Amid Khan Epi Technician							
(4)	Mr. Muleeb-ur-Rehman Epi Technician							
(5)	Mr. Zaechan Ahmad Warden (W/Boy)	P	P	P	P	P	P	P
(6)	Mrs. Kausar Inam (LHS)	K	K	K	K	K	K	K
(7)	Mr. Ibrahim (Bashi)	P	P	P	P	P	P	P
(8)	Mr. Raja Usiah (LHS Driver)	P	P	P	P	P	P	P
(9)	Mr. Asim Raheem Khan (J/Warch man)	P	P	P	P	P	P	P

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MEDICAL OFFICER
Basic Health Unit
Jugani Peshawar



ATTENDANCE REGISTER



Attendance Role For the Month February 2020

No	Name and Designation																					Total Late		Casual Leave		Holiday		Remarks																									
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month														
1)	MR SHAIKAT ALI																																																				
2)	MR TAHIR Zeb																																																				
3)	MR. AMID KHAN (Epi Tech)																																																				Transfer from BHU Jogan to BHU Charpana Date No 2021 dated 19/12/20
4)	MR. Mueech-in-Rahman Epi Tech																																																				
5)	MR Zeshan Ahmed (W/ Boy)																																																				
6)	MR. Ibrahim (Reshr)																																																				
7)	MR. Raza Ullah (LHS Driver)																																																				
8)	MISS Kausar Imam (LHS)																																																				
9)	MR. Mohammad Raheem (NIGHT WATCH MAN)																																																				

MEMORANDUM
 OFFICE
 Basic Health Unit
 Jogan Peshawar





ATTENDANCE REGISTER



Attendance Role For the Month: MARCH 2020

No	Name and Designation	Days																															Total Late		Casual Leave		Holiday		Remarks
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month	
(1)	MT SHAUKAT ALI	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
(2)	MT TAHIR Zeb	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
(3)	MR. Mujeeb-ur-Rehman (Epi Tech)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
(4)	MR. ZaShan ahmed (W/Boy)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
(5)	MISS. kausar Imam (LHS)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P						
(6)	MR. Ibrahim KHAN (Bachi)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P						
(7)	MR. Raza UNAH (LHS Driver)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P						
(8)	MR. Mohammed Raheem (Night Watchman)	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P						
(9)	AZAD KHAN	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P						

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3

Transferred to BHI

Manpower Kh. Office

Order NO: DD 583/36

SCANDY

MEDICAL OFFICER
Basic Unit
Jagat Peshawar



ATTENDANCE REGISTER



Attendance Role For the Month *April 2020*

No	Name and Designation																					Total Late		Casual Leave		Holiday		Remarks																								
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month													
1	Dr. Asad Khan MBBS - Incharge																																																			
2	Tahir Zia MT																																																			
3	MUJEEB UR Rehman EPI																																																			
4	Kausar Imam LHS																																																			
5	Zaaslan Ahmad w/boy																																																			
6	Jas Arshad Khan Bashir																																																			
7	Raza Ullah LHS-Driver																																																			
8	Madamad Rameem Watchman																																																			
9	MALIK SHAH PHC GDT (M)																																																			

M. N. J. N. J.
 MEDICAL OFFICER
 Basic Health Unit
 Jhang District

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Handwritten notes: 23/7/20

ATTENDANCE REGISTER



Attendance Role For the Month July 2019

No	Name and Designation																					Total Late		Casual Leave		Holiday		Remarks																
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month					
1)	Dr. Asad Khan MD (incharge)	RE	LA	RE	LA	RE	LA	RE	LA	RE	LA	RE	LA	RE	LA	RE	LA	RE	LA	RE	LA																				Ex-Durish Leave			
2)	Tahir Zeb Khan MT																																											
3)	Muqeeb-ur-Rahman Epi																																											
4)	Malik Shah Epi																																											
5)	Kusar Imam LHS																																											
6)	Ibrahim Bae Beshi																																											
7)	H. Raheem Choutidar																																											
8)	M. Raouf LHS Beshi																																											
9)	Dr. Nasir Ahmad																																											

Handwritten notes: MEDICAL OFFICER Basic Health Unit Logani Peshawar





ATTENDANCE REGISTER

August 2020



Attendance Role For the Month 201

No	Name and Designation	Days																				Total Late		Casual Leave		Holiday		Remarks												
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26		27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month	
1	Dr. Maryam Havaed	P	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X	X	X							
2	Tahir zoh. Khan	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X	X	X							
3	Muqeem ul Rehman	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X	X								
4	Malik Shah	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X	X								
5	Ibrahim Khan	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X	X								
6	Muhammad Razaq	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X	X								
7	Gulshan Dal	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X	X								

MEDICAL OFFICER
Basic Health Unit
Bani Peshawar





November 2020

ATTENDANCE REGISTER



Attendance Role For the Month: 2020

No	Name and Designation	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total Late		Casual Leave		Holiday		Remarks	
																																	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month		
1	MARYAM HAVAD WMO	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
2	MUTEEB-UR-REHMAN PHC (MD) EPI Tech	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
3	MALIK SHAH PHC (MD) EPI Tech	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
4	IBRAHIM KHAN Behshti	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
5	MUHAMMAD RAHEEM Chokidar	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
6	GUL JENAN Dai	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
7	SABIR HUSSAIN Medical Tech	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							

Visit in field

MEDICAL OFFICER
Basic Health Unit
Juggani Post Talawa

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January 2021

ATTENDANCE REGISTER



Attendance Role For the Month 201

No	Name and Designation	Days																															Total Late		Casual Leave		Holiday		Remarks												
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current Month	To end of Current Month	Current Month	To end of Current Month	Current Month	To end of Current Month													
1	MARYAM HAVAAD WMO	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P																	
2	MUJEEB-UR-BEHMAN PHC IMP) EPI Tech.	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P															
3	MALIK SHAH PHC (MP) EPI Tech.	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P													
4	IBRAHIM KHAN Behshli	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P												
5	MUHAMMAD RAHEEM Chokidar	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P										
6	GUL JEHAN Dai	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P								
7	SABIR HUSSAIN Medical Tech.	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P							
8	RIASAT ZEBA L.H.V	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P						

Sunday

Sunday

Sunday

Sunday

Sunday

MEDICAL OFFICER
BASIC HEALTH UNIT
JAGINI PESHAWAR



IN THE COURT OF HON'BLE CIVIL JUDGE, PESHAWAR

In reference

Muhammad Rahim

Vs

Secretary Health & Others

File be repositioned,
26
10/2/21

APPLICATION FOR SUSPENSION OF ORDER

NO.19333-38 DATED 09.12.2020 ISSUED VIDE

NO.19333-38/EDOH/IDCH DATED 09.12.2020.

Respectfully Sheweth:-

1. That the above titled case is pending adjudication before this Hon'ble Court and is fixed for W.S to day.
2. That the suit of the plaintiff was instituted on 24.08.2020 it has been noticed to defendants and consequently the defendants submitted their written statement on _____ wherein no mention of the order dated 09.12.2020 which is impugned herein the instant application.
3. That office order dated 09.12.2020 has been issued during the pendency of suit and is liable to be suspended with further request that plaintiff may not be relieved till final disposal of the titled case wherein the exact date of birth of the petitioner/plaintiff is 01.01.1964.
4. That it would be in the best interest of justice that order dated 09.12.2020 may kindly be suspended.

It is, therefore, most humbly prayed that on acceptance of this application, that the order No. 19333-38/EDOH/IDCH dated 09.12.2020, communicated to the plaintiff in the first week of the February, may please be suspend till the final disposal of the case.

Plaintiff

Through

Nasruminallah
Nasruminallah
Advocate, Peshawar

ATTESTED

21/ JUN 2021

(Examiner)
District Court Peshawar

IN THE COURT OF CIVIL JUDGE, PESHAWAR

73

Muhammad Raheem Versus Secretary Health and others

Reply to the application on behalf of defendant no 1 & 2 for the suspension of order dated 09-12-2020.

A. Preliminary objection:-

36

1. That the petitioner has no cause of Action to file the instant application against the answering defendants.
2. That the application is badly time barred hence not maintainable.
3. That this Honourble Court has got no Jurisdiction to entertain the present suit.

B. Para wise reply.

1. Para no 1 needs no comments.
2. Para no 2 is totally incorrect hence denied, it is submitted that the order dated 09-12-2020 is per according to Law and Regulation and completion of his service tenure super nation.
3. Para no 3 is incorrect hence denied.
4. Para no 4 is totally incorrect hence denied that the order dated 09-12-2020 is according to the service Rules ad per super nation.

19/4/21

It is therefore, most humbly prayed that the application of the plaintiff be dismissed with cost throughout.

ATTESTED

21 JUN 2021

(Examiner)
District Court Peshawar

Respondent No.1& 2

Secretary Health Through
Deputy District Health Officer
Town-II, Peshawar.

74

Peshawar Dist.

S#: 1

P Sec:004 Month:November 2020
PW6579 -DisttSuprtMngrPPHI-1522-2
"DisttSuprtMngr/PPHI-1522

Pers #: 00040176 Buckle: 0
Name: MUHAMMAD RAHIM
CHOWKIDAR
CNIC No.13701138074
GPF Interest Applied
02 Active Temporary

NTN: 0
GPF #: JM 016591
Old #: 99991672646

PW6579

PAYS AND ALLOWANCES:

0001-Basic Pay	19,210.00
0046-Personal Pay (Maxim Grade)	1,320.00
1210-Convey Allowance 2005	1,785.00
1300-Medical Allowance	1,500.00
1516-Dress/ Uniform Allowance	150.00
1567-Washing Allowance	150.00
2148-15% Adhoc Relief All-2013	491.00
2199-Adhoc Relief Allow @10%	323.00
2224-Adhoc Relief All 2017 10%	2,053.00
2247-Adhoc Relief All 2018 10%	2,053.00
2264-Adhoc Relief All 2019 10%	2,053.00

GPF Balance 199,625.00	Subrc:	770.00
3501-Benevolent Fund		600.00
4004-R. Benefits & Death Comp:		300.00

Total Deductions 1,670.00

31,049.00

D.O.B
24.06.1967

33 Years 05 Months 008 Days

LFP Quota:
HABIB BANK LIMITED G.T. ROAD, PESHAWAR.
11817900192103

تصویر
50 روپے

88101



ایڈوکیٹ: *M. N. Ali*

بار کونسل/ایسوسی ایشن نمبر: 14-4550

رابطہ نمبر: 0336-9176092

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سرروس ٹریبیونل خیبر پختونخواہ

مخاطب: <i>M. N. Ali</i>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
آن مقام ایڈووکیٹ *محمد رحیم وکیل* لیسٹریٹڈ *محمد مساز مدنی* *محمد عثمان اللہ ویل مقرر*
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کر کے واپس رکھنا اور فیصلہ برحسب دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ مقرر کر کے اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا سائنچہ پر دائر شدہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانباً اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے

الرقوم: *2021/2020/2021*

مقام کے لیے منظور ہے۔

Accepted by
[Signature]

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

محمد رحیم وکیل

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service No:- 7142 / 2021

Muhammad Raheem S/O Fazal Raheem R/P Shagyali Bala, House No. 1 PO Box, Shaggali Payan, District Peshawar.

Appellant

VERSUS

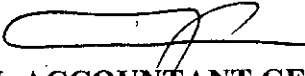
1. Secretary Health Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. District Health Officer, Town-II, Peshawar.
3. Director General AGPR, Khyber Pakhtunkhwa, Peshawar Division, Peshawar.
4. Chariman NADRA, Islamabad.
5. Director General, Islamabad.
6. Regional Director NADRA, Head Office, Hayatabad, Peshawar.

Respondents

The appellant, Muhammad Raheem S/O Fazal Raheem was the employee of Provincial Health Department, which falls under the jurisdiction of Provincial Government. This office only entertains Federal employees. It is pertinent to mention here that the provincial employees are entertained by the office of Accountant General Khyber Pakhtunkhwa and they will be in better position to respond.

PRAYER:-

Keeping in view the above explained position, this office may kindly be excluded from the respondent list and Accountant General Khyber Pakhtunkhwa may be included for future proceedings.


ADDITIONAL ACCOUNTANT GENERAL
AGPR, SO, Peshawar
(Respondent No. 03)

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 7142/2021.

Muhammad Raheem

-----Appellant

Versus

- 1: Through Secretary Health, Govt of Khyber Pakhtunkhwa Peshawar.
- 2: District Health Officer, Town-II, Peshawar.
- 3: Director General AGPR Khyber Pakhtunkhwa Peshawar Division Peshawar.
- 4: Chairman NADRA , Islamabad
- 5: Director General , Islamabad.
- 6: Regional Director NADRA, Head Office , HayatAbad Peshawar.

-----Respondents

PARAWISE REPLY ON BEHALF OF RESPONDENTS No.01 & 02.

Preliminary Objections:-

1. The appellant has neither cause of action nor locus standi to file the instant appeal.
2. The appellant has not come to the court with clean hands.
3. The appeal is bad for mis joinder and non joinder of the necessary and proper parties.
4. That the instant appeal is barred by law and badly time barred.
5. That the appellant has been stopped being his own conduct to file the appeal.
6. That this Honourble Services Tribunal has no jurisdiction to adjudicate to matter.

Respectfully Shewith ,
Reply on facts;

Para No.1 Pertains to record, hence need no comments.

Para No.2 Needs to be proceed.

Para No.3 Incorrect, as per his services book, his date of birth is 01-07-1958.

Para No.4 Incorrect, as per his services book, the correct date of birth is 01-07-1958 & his date of birth could not be altered or changed at this stage under GFR116.

Para No. 5 Pertains to record.

Para No. 6 Related to NADRA.

Para No. 7 Incorrect, the instant appeal being badly time barred & is not maintainable.

Reply on Grounds:

A: - Incorrect, as per para 4.

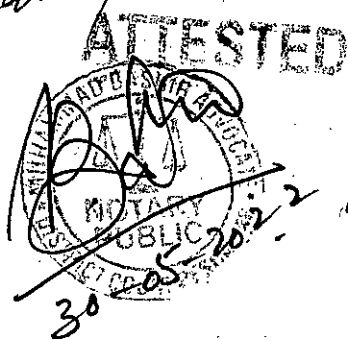
- B: - Incorrect, under GFR 116 date of birth once recorded cannot be subsequently altered or changed.
- C: - Pertains to record, however another date of entry in his service card does not entitle him for changing his entry into services book.
- D: - Pertains to record
- E: - Incorrect, as per para "B"
- F: - Pertains to record, Hence detail reply has been given in above paras.
- G: - Pertains to record, Hence the department has the right to recover the salaries, received by the appellant beyond his services.
- H: - Incorrect, the reply respondents acted as per Law and Rules.
- I: - Incorrect.
- J: - That the respondent also seek permission to raise further points at the time of final Arguments.

It is therefore, requested that the services appeal in hand, being devoid of merits, may graciously be dismissed with cost.

[Signature]
Respondent No.01
 Secretary Health
 Khyber Pakhtunkhwa Peshawar

[Signature]
Respondent No. 02
 District Health Officer, Town-II
 Peshawar

Affidavit: that The contents of the reply are true and correct and nothing has been conceal from this Tribunal.



DEPONENT
 17101-0365818-9

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 7142/2021.

Muhammad Raheem

-----Appellant

Versus

- 1: Through Secretary Health, Govt of Khyber Pakhtunkhwa Peshawar.
- 2: District Health Officer, Town-II, Peshawar.
- 3: Director General AGPR Khyber Pakhtunkhwa Peshawar Division Peshawar.
- 4: Chairman NADRA , Islamabad
- 5: Director General , Islamabad.
- 6: Regional Director NADRA, Head Office , HayatAbad Peshawar.

-----Respondents

PARAWISE REPLY ON BEHALF OF RESPONDENTS No.01& 02.

Preliminary Objections:-

1. The appellant has neither cause of action nor locus standi to file the instant appeal.
2. The appellant has not come to the court with clean hands.
3. The appeal is bad for mis joinder and non joinder of the necessary and proper parties.
4. That the instant appeal is barred by law and badly time barred.
5. That the appellant has been stopped being his own conduct to file the appeal.
6. That this Honourble Services Tribunal has no jurisdiction to adjudicate to matter.

Respectfully Shewith ,

Reply on facts;

Para No.1 Pertains to record, hence need no comments.

Para No.2 Needs to be proceed.

Para No.3 Incorrect, as per his services book, his date of birth is 01-07-1958.

Para No.4 Incorrect, as per his services book, the correct date of birth is 01-07-1958 & his date of birth could not be altered or changed at this stage under GFR116.

Para No. 5 Pertains to record.

Para No. 6 Related to NADRA.

Para No. 7 Incorrect, the instant appeal being badly time barred & is not maintainable.

Reply on Grounds:

A: - Incorrect, as per para 4.

- B: - Incorrect, under GFR 116 date of birth once recorded cannot be subsequently altered or changed.
- C: - Pertains to record, however another date of entry in his service card does not entitle him for changing his entry into services book.
- D: - Pertains to record
- E: - Incorrect, as per para "B"
- F: - Pertains to record, Hence detail reply has been given in above paras.
- G: - Pertains to record, Hence the department has the right to recover the salaries, received by the appellant beyond his services.
- H: - Incorrect, the reply respondents acted as per Law and Rules.
- I: - Incorrect.
- J: - That the respondent also seek permission to raise further points at the time of final Arguments.

It is therefore, requested that the services appeal in hand, being devoid of merits, may graciously be dismissed with cost.



Respondent No.01
 Secretary Health
 Khyber Pakhtunkhwa Peshawar



Respondent No. 02
 District Health Officer, Town-II
 Peshawar

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 7142/2021.

Muhammad Raheem

-----Appellant

Versus

- 1: Through Secretary Health, Govt of Khyber Pakhtunkhwa Peshawar.
- 2: District Health Officer, Town-II, Peshawar.
- 3: Director General AGPR Khyber Pakhtunkhwa Peshawar Division Peshawar.
- 4: Chairman NADRA , Islamabad
- 5: Director General , Islamabad.
- 6: Regional Director NADRA, Head Office , HayatAbad Peshawar.

-----Respondents

PARAWISE REPLY ON BEHALF OF RESPONDENTS No.01& 02.

Preliminary Objections:-

1. The appellant has neither cause of action nor locus standi to file the instant appeal.
2. The appellant has not come to the court with clean hands.
3. The appeal is bad for mis joinder and non joinder of the necessary and proper parties.
4. That the instant appeal is barred by law and badly time barred.
5. That the appellant has been stopped being his own conduct to file the appeal.
6. That this Honourble Services Tribunal has no jurisdiction to adjudicate to matter.

Respectfully Shewith ,

Reply on facts;

Para No.1 Pertains to record, hence need no comments.

Para No.2 Needs to be proceed.

Para No.3 Incorrect, as per his services book, his date of birth is 01-07-1958.

Para No.4 Incorrect, as per his services book, the correct date of birth is 01-07-1958 & his date of birth could not be altered or changed at this stage under GFR116.

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Para No. 6 Related to NADRA.

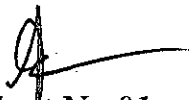
Para No. 7 Incorrect, the instant appeal being badly time barred & is not maintainable.

Reply on Grounds:

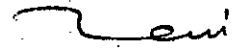
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Respondent No.01
 Secretary Health
 Khyber Pakhtunkhwa Peshawar



Respondent No. 02
 District Health Officer, Town-II
 Peshawar