Date of order/ Order or other proceedings with signature of Judge or proceedings Magistrate and that of parties where necessary. S.No. 3 2 1 KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. Service Appeal No. 7638/2021 Bashir Ahmad, Chief PHC Technician, (Multi-Purpose), (BPS-16)/Store Keeper, District Health Officer, Swat. ... (Appellant) Versus The Director General Health Services, Khyber 1. Pakhtunkhwa, Peshawar and three others. (Respondents) 27.10.2021 Appellant with counsel present. Preliminary arguments heard and record perused. The memorandum of appeal and the record annexed there with have been perused. The appeal is not fit for admission to the regular hearing for the reason to follow. 2. According to the order bearing endorsement No. 3382-484/(Promotion Cell) dated 27.05.2021, the appellant among others was promoted to the Chief PHC Technician (MP) (BS-16). He vide another order dated 28.05.2021 of the District Health Officer Swat was adjusted/posted against the newly upgraded post of Chief PHC Technician on DHO Office Swat in pursuance to the promotion order dated 27.05.2021. He submitted his arrival report for duty on the said post and his charge report was forwarded to the DG Health by DHO vide

> 143]

letter dated 03.06.2021. According to order dated 30.06.2021, one Dr. Sajjad-Ur-Rehman, Medical Officer (BS-17) DMS, DHQ Swat was directed to perform duty as incharge District Store/procurement officer the appellant Medicine and alongwith one Umer Habib were directed to perform duty under supervision of the afore named doctor Sajjed-Ur-Rehman. The said order was substituted by another order dated 02.07.2021 whereby while keeping the assignment of Dr. Sajjad-Ur-Rehman intact, the appellant was relieved from the District Medicine Store and directed to perform his duty against his original post. The appellant has impugned the said order through present appeal with the prayer that the said order of respondent No.2 may be set aside and he i.e applicant may be allowed to perform his duty as Store Keeper in Main Store of DHO Office Swat at Gulqada. The said order in its essence is meant to relieve the appellant from duty of the post which was not actual incumbency. Rather he was assigned the work of the said post at cost of the duties of his actual post. The actual post of the appellant is Chief PHC Technician and he after his relieving from assignment of duties of another post has been directed to perform duty on his original post. The very prayer in the appeal relates to a claim of the appellant to hold the particular post of Store Keeper of District Medicine Store which as per his appointment order is not his actual post. According to proviso (b) of Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 no appeal lies to a Tribunal against an order or decision of the departmental authority determining the fitness or otherwise of a person to

hold a particular post. Needless to say that the competent authority having deemed fit directed the appellant to perform the duty of the post of Store Keeper at District Medicine Store and then again deeming otherwise has relieved him from the said duty. Therefore, the appellant cannot claim as a matter of right to hold the post of Store Keeper at District Medicine Store which otherwise is not a proper post as far as his original post is concerned.

3. For the reason having gone here in above, this appeal is dismissed in limine. File be consigned to the record room.

(AHMAD SULTAN TAREEN) Chairman

ANNOUNCED 27.10.2021

3

Form-A.

FORM OF ORDER SHEET

. Court of__

	Case No	7638/2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
·1	2	3
1-	21/10/2021	The appeal of Mr. Bashir Ahmad presented today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-		REGISTRAR This case is entrusted S. Bench at Peshawar for preliminary hearing to be put there on $27 10 24$.
		CHAIRMAN
· · · · ·		
- - -		
	· · · ·	

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C	Case Title: Bashin Almal v/s DGHS		
S#	CONTENTS	YES	NO
1	This Appeal has been presented by: Fazal Shah Mohmand, (ASC)	√	
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?	\checkmark	
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?	\checkmark	
13	Whether copy of appeal is delivered to AG/DAG?		
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	X	
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	 ✓ 	·
19	Whether requisite number of spare copies attached?		
20	Whether complete spare copy is filed in separate file cover?		
21	Whether addresses of parties given are complete?		
22	Whether index filed?		
23	Whether index is correct?	\checkmark	
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: FAZAL SHAH MOHMAND ASC Signature: MDP Dated:

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 7638 /2021

Bashir AhmadAppellant

VERSUS

DGHS and Others.....Respondents

INDEX

S No	Description of Documents	Annexure	Pages
1.	Service Appeal with Affidavit		1-4
2.	Application for suspension of impugned Orders with Affidavit		5
3.	Copies of Certificates & order dated 27-05-2021	A & B	6-25
4.	Copies of Arrival report & Letter dated 03- 06-2021	C & D	26-27
5.	Copies of Photographs, Office Order dated 07-06-2013, Office Order dated 17-10-2018, Charter of demand dated 17-03-2021, Application dated 28-04-2021 & Notification dated 20-01-2021	E, F, G, H,I & J	28-53
6.	Copy of Order dated 02-07-2021, Plaint & Order dated 27-09-2021	K&L	54-74
7.	Copy of departmental appeal dated 05-08-2021	M	75-78
8.	Copies of Letters dated 20-04-2015 & 23- 09-2016	N	79-81
9.	Copy of Budget Book & Pay Slip	0	82
10.	Vakalat Nama		83

Dated:-21-10-2021

19 \rightarrow

Through

FAZAL SHAH MOHMAND ADVOCATE, SUPREME COURT OF PAKISTAN.

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841 **Email:-** fazalshahmohmand@gmail.com BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR Vice Trib

Service Appeal No 76 38 /2021

Diary No. 217 Diary No. 217 Batea 21/10/202

Bashir Ahmad, Chief PHC Technician, (Multi-Purpose), (BPS-16)/Store Keeper, District Health Officer, Swat......Appellant

VERSUS

- 1. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar
- 2. District Health Officer, District Swat at Gulkada.
- **3.** Secretary, Health Department, Khyber Pakhtunkhwa, Peshawar.
- 4. Dr. Sajjad Ur Rehman (Medical Officer BPS-17), Deputy Medical Superintendent, Tehsil Headquarter Hospital Matta, District Swat.

APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 02-07-2021 PASSED BY RESPONDENT NO 2 WHERE BY THE APPELLANT HAS BEEN RELIEVED FROM THE OFFICE OF RESPONDENT NO 2 AND DIRECTED TO PERFORM HIS DUTY AGAINST HIS ORIGINAL POST AND AGAINST WHICH DEPARTMENTAL APPEAL OF THE APELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN TWO MONTHS

PRAYER:-

On acceptance of this appeal the impugned order of respondent No 2 dated 02-07-2021, may kindly be set aside and the appellant may kindly be allowed to perform his duties as Store Keeper Main Store, DHO Office Swat at Gulkada.

Respectfully Submitted:-

1. That the appellant is the bonafide resident of District Swat who has qualified Master Degree in Public Health in the year 2009 and is having extensive experience of his filed being passed and participated in various programs and workshops. The appellant was appointed as Medical Technician on 03-03-1988, was later on upgraded and having and was lastly promoted as Chief PHC Technician (Multi-Purpose BPS-16)) by respondent No 1 vide order dated 27-05-2021 and was posted at the office of respondent No 2 vide the same order. The appellant since appointment performed his duties as assigned and with honesty and full devotion and to the entire satisfaction of his superior officers. (Copies of Certificates & order dated 27-05-2021 are enclosed as Annexure A & B).

2. That accordingly, the appellant submitted his arrival which was forwarded by respondent No 2 to respondent No 1 for information and necessary action vide letter dated 03-06-2021. (Copies of Arrival report & Letter dated 03-06-2021 are enclosed as Annexure C & D).

- 3. That Mr Khurshed Ahmad, a political worker of PTI since long is presently the President of Paramedical Association District Swat while the appellant is presently, the elected Provincial Vice President of Paramedical Association. It is pertinent to mention that the said Khurshed Ahmad being active worker of ruling party is politicizing the Association and is using his influence through Govt. officials for victimizing his opponents and even on 17-03-2021 they held meeting with respondent No 2 by presenting the Charter of demand wherein the demand of transfer of the appellant from his post was also included while also requested respondent No 2 for the transfer of the appellant vide application dated 28-04-2021. (Copies of Photographs, Office Order dated 07-06-2013, Office Order dated 17-10-2018, Charter of demand dated 17-03-2021, Application dated 28-04-2021 & Notification dated 20-01-2021 are enclosed as Annexure E, F, G, H, I & J).
- 4. That consequently the appellant was transferred from his post while respondent No 4 was transferred in place of the appellant by respondent No 2 vide Office Order dated 02-07-2021, against which order the appellant approached the Court of learned Civil Judge at Swat who granted interim relief in favor of the appellant and finally returned the case file to the appellant for presenting the same before the proper forum within one month and in the meanwhile respondents were restrained from taking any illegal action against the appellant vide order dated 27-09-2021. (Copy of Order dated 02-07-2021, Plaint & Order dated 27-09-2021 are enclosed as Annexure K & L).
- 5. That the appellant submitted Departmental appeal before respondent No 1, on 05-08-2021 which has not been responded so far despite the lapse of more than two months. (Copy of departmental appeal dated 05-08-2021 is enclosed as Annexure M).
- **6.** That the impugned order of respondent No 2 dated 02-07-2021 is against the law, facts and principles of justice on grounds inter alia as follows:-

GROUNDS:-

- A. That the impugned order is illegal and void ab-initio.
- **B.** That the appellant is not treated in accordance with law and rules on the subject in violation of Article 4 and 25 of the Constitution and law of the land.
- **C.** That the impugned order is void being without jurisdiction and lawful authority, as the appellant is serving in BPS-16 and respondent No 2 is not the competent authority which fact is

also evident from the promotion order of the appellant thus liable to be set at naught at this score alone. (Copies of Letters dated 20-04-2015 & 23-09-2016 are enclosed as Annexure N).

- **D.** That the impugned order is politically oriented as evident from chain of instances and thus not tenable in the eyes of law.
- E. That even the same is premature as the appellant was transferred just after forty days of his posting without any justification.
- F. That even according to Rule 27 of the Govt. Servants Conduct Rules 1987 of the province no Govt. servant can participate in politics and even after retirement as per CSR 351(2) and 1.7(d) West Pakistan Civil Services Pension Rules 1963, he is not allowed to participate in politics, thus too the impugned order is liable to be set at naught.
- G. That even the post from which the appellant has been transferred is the designated post of the appellant and as such too the impugned order is liable to be set aside. (Copy of Budget Book & Pay Slip is enclosed as Annexure O).
- H. That the impugned order is not a speaking order as required under Section 24-A of the General Clauses Act and on this score alone is liable to be set aside.
- I. That the impugned order has been passed subsequent to the charter of demand and application of a political activist, which is having no lawful sanctity.
- J. That the appellant is presently the Provincial Vice president of Malakand Division and is subjected to political activism.
- **K.** That even the appellant has not been posted against any post rather has only been relieved from his post and on this score too the impugned order is liable to be set aside.
- L. That even the impugned order is premature and in violation of the transfer posting policy of the provincial policy, thus liable to be set aside on this score alone.
- M. That even there is no complaint of any sort against the appellant.
- N. That the malafide is floating on the surface of the impugned order wherein a Doctor has been posted as Store Keeper in utter violation of law and rules on the subject.
- **O.** That the appellant has about long service career with unblemished service record and has not relinquished the charge yet.

P. That the appellant seeks the permission of this honorable Tribunal for further/additional grounds at the time of arguments.

It is therefore prayed, that appeal of the appellant, may kindly be accepted as prayed for.

Dated:-21-10-2021

Through

Appellant lah &

FAZAL SHAH MOHMAND Advocate, Supreme Court of Pakistan.

DVOCATE

-4-

LIST OF BOOKS

1. Constitution 1973.

2. other books as per need

CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

AFFIDAVIT

I, Bashir Ahmad, Chief PHC Technician, (Multi-Purpose), (BPS-16)/Store Keeper, District Health Officer, Swat, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

DEPONENT

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No_____ /2021

Bashir Ahmad......Appellant

VERSUS

DGHS and Others......Respondents

APPLICATION FOR THE SUSPENSION OF IMPUGNED ORDER DATED 02-07-2021 OF RESPONDENT 2 TILL THE FINAL DISPOSAL OF TITLED APPEAL, BY MANTAINING STATUS QUO.

Respectfully Submitted:-

- **1.** That the above titled appeal is being filed today, in which no date of hearing has been fixed so far.
- **2.** That the facts and grounds of appeal may kindly be considered as integral part of this application.
- **3.** That the applicant/appellant has got good prima facie case and is sanguine of its success.
- 4. That the balance of convenience also lies in favor of the applicant/appellant.
- **5.** That the applicant/appellant is still holding the charge of his post and if the impugned orders are not suspended the applicant/appellant will suffer an irreparable loss.

It is therefore prayed that on acceptance of this application, the impugned order dated 02-07-2021 may kindly be suspended till the final disposal of the titled appeal by maintaining status quo.

Dated:-21-10-2021

Through



FAZAL SHAH MOHMAND ADVOCATE, SUPREME COURT OF PAKISTAN.

AFFIDAVIT

I, Bashir Ahmad, Chief PHC Technician, (Multi-Purpose), (BPS-16)/Store Keeper, District Health Officer, Swat, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.





P

Provincial Health Services Academy, Peshawar.

Faculty of Health and Behavioral Sciences Human Resource Development Cell

Course Completion Certificate

Mr. Bashir Ahmad

Has completed course work of Master of Public Health Program

September 2007 – January 2009

Andales Dr. Andaleeb Umer

Coordinator MPH Program 614mg

"A"

Dr. Mahmood Alam

Rector MPH Program

Dr. Fazal Mahmood

DIRECTOR



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ATTESTED

S. 66 G .

THE DISTRICT HEALTH INFORMATION SYSTEM PROJECT FOR EVIDENCE-BASED DECISION MAKING AND MANAGEMENT

This is to certify that

HAJI BASHIR AHMAD

Designation

Medical Technologist

Organization

Director General of Health Services, Khyber Pukhtunkhwa

has successfully completed three days training course as DHIS Provincial Master Trainer

Heid from 19 July, 2010 to 21 July, 2010 at Islamabad

Mr. Shuji Noguchi Team Leader DHIS Project

D. Iffikher Ahmed Khan Executive Director National Health Information Resource Center Islamic Republic of Pakistan

Course Direct Academy Teaching Methodology/Computer Shills held out Provincial Health Services participated in and successfully impleted he porkshop / course Instructor at Paramed This is to certify that Provincial Health Services Academy Dept: of Health Govt. NWFP rom: 13th April 2009 Basher Ahmad 0 18" 4517 2009. for Medical Technology Swat working Director PHSA uo , has ŝ

ESTED







PAKISTAN INITIATIVE FOR MOTHERS AND NEWBORNS (PAIMAN) CERTIFICATE OF TRAINING

This is to certify that

BASHIR AHMAN has successfully completed two days

"TRAINING ON USE OF INFORMATION FOR EVIDENCE BASED DECISION MAKING"

held on 24-25 MAY ,2010 at SLAMABAD

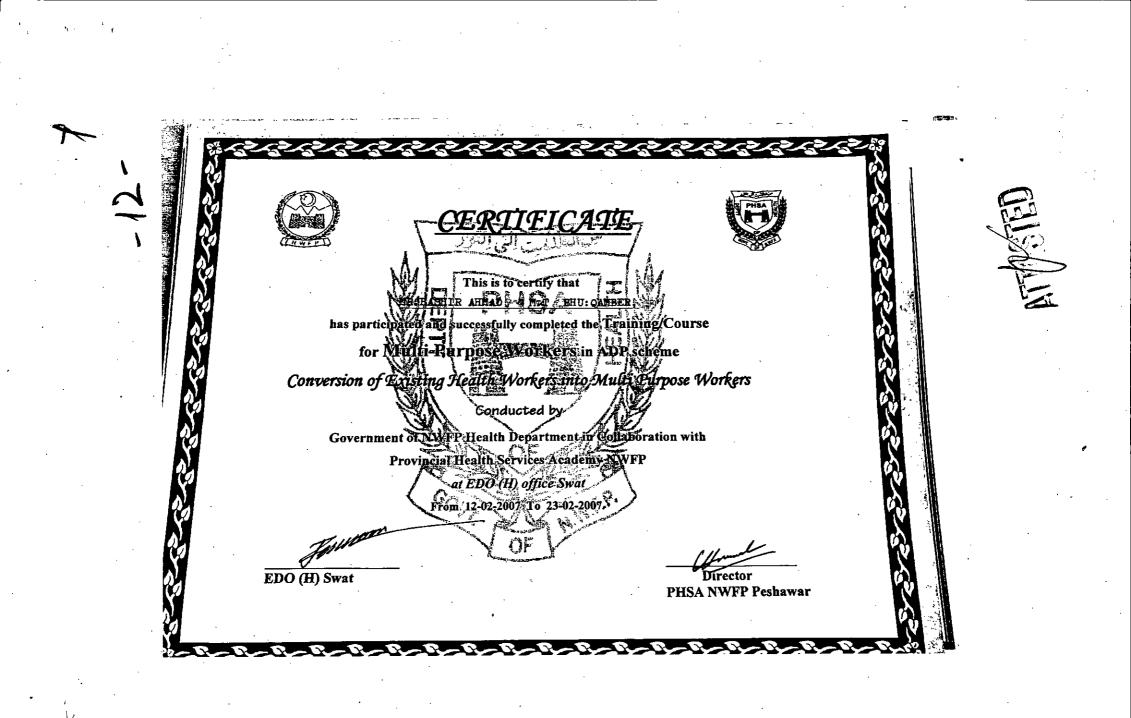
Organized by Contech International Health Consultants

Dr. Nabeela Ali Chief of Party JSI-PAIMAN

Nabul H.

En - 12

Dr. Naeem ud Din Mian Chief Executive Officer Contech International









Mr. Bashir Ahmad

Is awarded this certificate for facilitating "5 days training on Combined Course on Growth Assessment and Infant & Young Child Feeding Counselling (IYCF)"

Jointly Organized by Department of Health, Khyber Pakhtunkhwa & Integrated Health Systems Strengthening & Service Delivery (IHSS-SD)

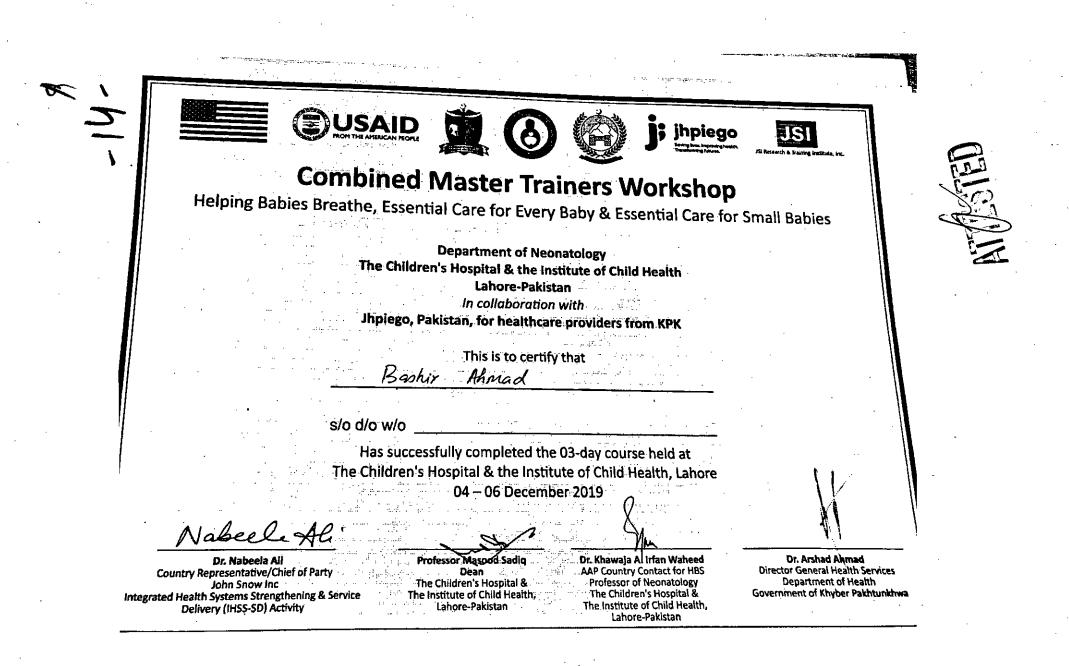
> 14th October to 18th October, 2020 At City Hospital Lakki Marwat

Dr. Mohsina Sultana Course Director

Dr. Abu Gul | District Health Officer, Lakki Marwat Khyber Pakhtunkhwa

Nobela Al.

Dr. Nabeela Ali Country Director / Chief of Party IHSS & SD Activity





CERTIFICATE OF PARTICIPATION THIS CERTIFICATE IS PROUDLY PRESENTED TO

Mr./Ms._____ BASHIR AHMAD

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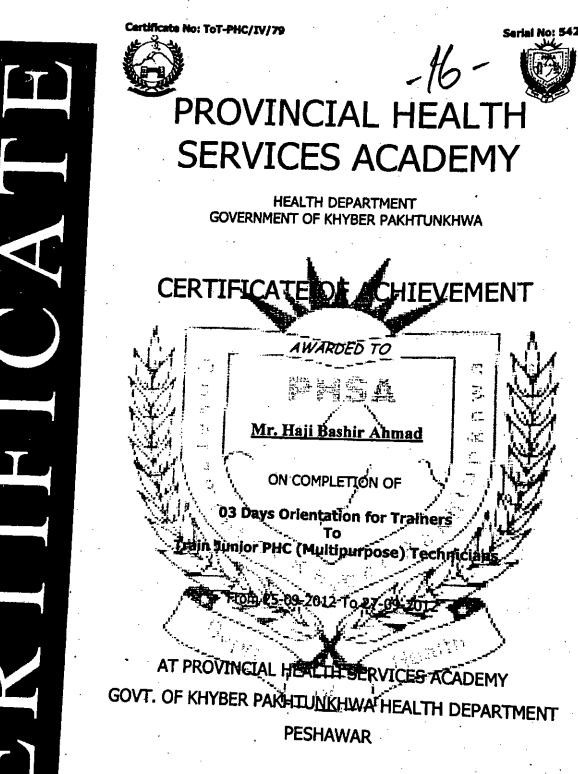
In recognition of participation in four day-training workshop

on Right to Information and Budgets Advocacy

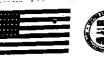
ORGANIZED BY : Centre for Governance and Public Accountability (CGPA) www.c-gpa.org



General Manager



Director PHSA Peshawar









SI Research & Training Institute, in

AT WATER

Certificate

Bashir Ahmad

Is awarded this certificate for attending "6 days Training on Integrated Management of Neonatal and Childhood illness (IMNCI)"

Jointly Organized by Department of Health, Khyber Pakhtunkhwa & Integrated Health Systems Strengthening & Service Delivery (IHSS-SD)

18th to 23rd November, 2019 Children's Hospital. Pakistan Institute of Medical Sciences, Islamabad

Dr Amir İsrar **Course Director**

Dr Tahir Bashiruddin Khilji Add Director General, DOH Khyber Pakhrunkhwa

Nabelle A.

Dr Nabeela Ali Country Director / Chief of Party IHSS&SD Activity







THE DISTRICT HEALTH INFORMATION SYSTEM PROJECT FOR EVIDENCE-BASED DECISION MAKING AND MANAGEMENT

This is to certify that

HAJI BASHIR AHMAD

Designation

Medical Technologist

Organization

Director General of Health Services, Khyber Pukhtunkhwa

has successfully completed three days training course as DHIS Provincial Master Trainer

- Held from 19 July, 2010 to 21 July, 2010 at Islamabad

Mr. Shuji Noguchi Team Leader DHIS Project

D. Hilkhar Ahmed Khan Executive Director National Health Information Resource Center Islamic Republic of Pakistan



DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHWAR

OFFICE ORDER: -

Consequent upon approval accorded by the Departmental Promotion Committee, the following Senior PHC Technicians (MP) (BS-14) are hereby promoted to the post of Chief PHC Technicians (MP) (BS-16) with immediate effect:-

	Name	· · · · · · · · · · · · · · · · · · ·	
1.	Jamalia S/O	Place of Posting	
	Zarawar Khan	DHO Chitral	
2.	Farzana Naheed S/O		
	Umar Bakhsh	DHO Peshawar	
3.	Naheed Jan S/O		
	Noorullah	DHO Peshawar	
4.	Abdul Haleem S/O	BHO I Cshawai	
	Ghulam Jan	DHO Karak	
5.	Rasool Nawaz S/O		
	Muhammad Sher	DHO Bannu	
6.	Sanaullah S/O		
	Abdu Gul	DHO Bannu	
7.	Farhatullah S/O		
	Muhammad Zaman	DHO Bannu	
8.	Muhammad Saeed S/O		
	Saad Ullah Khan	DHO Peshawar	
9.	Rehmatullah S/O		
	Saced Ullah	DHO Bannu	
10.			
	Gul Muhammad	DHO Abbottabad	
· 11.	Zar Gul S/O		
	Muhammad Ali	DHO Bannu	
12.	Sadat Khan S/O		
	Akbar Said Khan	DHO Lower Dir	
13.	Samiullah S/O		
	Fazal Haleem	DHO Lower Dir	
14.	Niaz Bin Jan S/O		
	Fateh Gul	DHO Lower Dir	
15,	Iqbal Hussain S/O		
	Abdur Rashid	DHO Lower Dir	
16.	Fakhar Zaman S/O		
	Muhammad Suleman	DHO Bannu	
17.	Muhammad Ghafoor S/O		
	Maghfoor Habib	DHO Lower Dir	
18.	Ijaz Ahmad S/O		
	Sultan Ahmad	DHO Peshawar	
19,	Muhammad Iqbal S/O		
	Abdur Rehman	DHO Dir Upper	
20.	Muhammad Asif S/O		
		AS Mohmand	
21.	Niaz Wali S/O		
	Nooran Shah	DHO Malakand	
22.	Abdul Qayum S/O		
	Rehmat Ullah	DHO Mansehra	
23.	Muhammad Ajmal S/O		
	Muhammad Haroon	DHO Abbottabad	

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24.	Shakeel Alam S/O	DHO Mansehra	<u> つん - *</u>
05	Shah Zaman		- 20
25.	Muhammad Shabir S/O	DHO Mansehra	-
26.	Muhammmad Afzal Habib ur Rehman S/O	· · · ·	
20.	Abdur Rehman	DHO Abbottabad	
27.	Umar Faroog S/O		
	Wajahat Hussain	DHO Abbottabad	
28.	Sajjad Ahmad Jan S/O		
LU.	Ali Rehman	DHO Mansehra	·, ·
29.	Muhammad Riaz S/O		-
LV.	Abdul Manan	DHO Mansehra	
30.	Muhammad Sajjad S/O		
	Muhammad Irshad	DHO Abbottabad	
31.	Muhammad Dilpazir S/O		
	Muhammad Aziz	DHO Abbottabad	
32.	Malak Aman S/Q		
	Taj Muhammad	DHO Abbottabad	
33.	Sher Ali Baz S/O		
	Ghulam Nasiruddin	DHO Lakki Marwat	
34.	Abdur Rauf Shah S/O		
. •	Zulfat Shah	DHO Mardan	
35.	Muhammad Israr S/O		
	Muhammad Ghayyas	DHO Peshawar	
36.	Naeemullah S/O	DUO Charachta	
	Muhammad Ullah Khan	DHO Charsadda	
37.	Alam Zeb S/O	DHO Mardan	
	Abdur Rashid		· · ·
38.	Shaheen Iqbal S/O	DHO Karak	
	Zarwali Khan		· .
39.	Said Rahim S/O	DHO Malakand	
	Gul Muhammad		
40.	Mir Abad ur Rehman S/O	DHO Karak	
41.	Amal noor Amina Khatoon D/O		-
41.	Meher Dil Khan	DHO Nowshera	· · ·
42.	Wazir Zada S/O		
4 4.	Manadar	DHO Dir Upper	•
43.	Tarig Mehmood S/O		
τ φ .	Muhammad Fareed	DHO Abbottabad	`
44.	Zuhria Begum D/O		
• ••	Malik Fazli Subhan	DHO Mardan	i
45.	Tawheed Begum S/O		
	Ashraf Khan	DHO Nowshera	
46.	Taslim Akhtar S/O	······	
	Muqaddar Jan	DHO Swat	
47.	Yasmin Ali Shakir S/O	· · · · · · · · · · · · · · · · · · ·	n ·
	Fida Ali Khan	DHO Peshawar	
48.	Ikram Khan S/O	——————————————————————————————————————	
	Aman Ullah	DHO Bannu	· .
49.	Amina Bibi S/O		
	Qazi Raza Muhammad	DHO DIKhan	,
50.	Shafiullah Khan S/O		
	Muhammad Din	DHO Bannu	
51.	Fazle Subhan S/O		`
	Aziz ul Karim	DHO Upper Dir	
52.	Muhammad Ajmal S/O		· .
	Muhammad Umar	DHO Bannu	.
53.	Inamullah S/O Hayat Khan	DHO Bannu	· ·
	1 1 1 4 1/1 -		I

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- 54			
54.	Muhammad Inayatullah S/O	DHO Shangla	
	Muhammad Samiullah		
55.	Marwatullah S/O	DHO Bannu	
	Muhammad-Zaman		
56.	Muhammad Aman S/O	DHO Dir Lower	
	Khista Khan	Billo Bill Bomei	
57.	Shela Yasmeen S/O	DHO DIKhan	
	Muhammad Zubair	Dito Ditental	
58.	Said Ahmad Khan S/O	DHO Buner	
	Muntaizr Khan	Dito Build	
59.	Muhammad Rehman S/O	DHO Swat	
	Rehman ud Din	Bile Small	
60.	Irfanullah S/O	DHO Swat	
`	Asfandyar	DHO Swat	
61.	Muhammad Faqir S/O	DHO Swat	
	Gul Farooq	Dilo Swat	
62.	Nighat Yasmeen S/O	DHO DIKhan	
	Khuda Baskhsh		
63.	Umar Faroog S/O	DHO Malakand	
	Usman Ghani		
64.	Javed Ahmad S/O	DHO Dir Lower	
	Fazal Rahim	DHO DII Lowei	
65.	Fazle Amin S/O	DHO Malakand	
	Abdul Hanan	DITO Matakana	
66.	Jehangir Shah S/O	DHO Malakand	
	Said Johar Badshah		
67.	Ghulam Akbar S/O	DHO Malakand	
	Malook		
68.	Bashir Ahmad S/O	DHO Swat	
	Muhammad Fayyaz		
69.	Khurshid Afreen S/O	DHO Dir Lower	
	Saif ur Rehman		
70.	Alamzeb S/O	DHO Mansehra	
	Ghulam Rabbani		
71.	Ghulam Murtaza S/O	DHO Abbottabad	
	Muhammad Suleman		
72.	Muhammad Jamil S/O	DHO Abbottabad	
<u> </u>	Abdul Qayyum		
73.	Syed Iqtidar Ali Shah S/O	DHO Peshawar	
<u> </u>	Sadaqat Hussain		
74.	Saeedullah S/O	DHO Swat	
	Molvi Zardad		
75.	Nawab Khan S/O	DHO Bannu	
<u> </u>	Jama Khan	· · · · · · · · · · · · · · · · · · ·	
76.	Izhar Ahmad S/O	DHO Peshawar	
t	Nisar Ahmad		

On their promotion as Chief PHC Technicians (MP) (BS-16) the following posting/ transfer are hereby ordered in the interest of public service with immediate effect:-

	Name/F, Name of Officials	From	То	Remarks
1.	Jamalia S/O Sarawar Khan	DHO Chitral	DHO Chitral	Against the Vacant Post
2.	Farzana Naheed S/O Umar Bakhsh	DHO Peshawar	DHO Peshawar	Do-
3.	Naheed Jan S/O Noorullah	DHO Peshawar	DHO Peshawar	Do-
4.	Abdul Haleem S/O Ghulam Jan	DHO Karak	DHO Karak	Do-

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5.	Rasool Nawaz S/O Muhammad Sher	DHO Bannu	DHO Bannu	Do-
6.	Sanaullah S/O Abdu Gul	DHO Bannu	DHO Bannu	Do-
7.	Farhatullah S/O Muhammad Zaman	DHO Bannu	DHO Bannu	Do-
8.	Muhammad Saeed S/O Saad Ullah Khan	DHO Peshawar	DHO Peshawar	Do-
9.	Rehmatullah S/O Saced Ullah	DHO Bannu	DHO Bannu	Do-
10.	Saaduddin S/O Gul Muhammad	DHO Abbottabad	DHO Abbottabad	Do-
11.	Zar Gul S/O Muhammad Ali	DHO Bannu	DHO Bannu	Do-
12.	Sadat Khan S/O Akbar Said Khan	DHO Lower Dir	DHO Lower Dir	Do-
13.	Samiullah S/O Fazal Haleem	DHO Lower Dir	DHO Lower Dir	Do-
14.	Niaz Bin Jan S/O Fateh Gul	DHO Lower Dir	DHO Lower Dir	Do-
15.	Iqbal Hussain S/O Abdur Rashid	DHO Lower Dir	DHO Lower Dir	Do-
16.		DHO Bannu	DHO Bannu	Do-
17.	Muhammad Ghafoor S/O Maghfoor Habib	DHO Lower Dir	DHO Lower Dir	Do-
18.	Ijaz Ahmad S/O Sultan Ahmad	DHO Peshawar	DHO Peshawar	Do-
19.	Muhammad Iqbal S/O Abdur Rehman	DHO Dir Upper	DHO Dir Upper	Do-
20.	Muhammad Asif S/O	AS Mohmand	DHO Charsadda	Do-
21.	Niaz Wali S/O Nooran Shah	DHO Malakand	DHO Malakand	Do-
22.	Abdul Qayum S/O Rehmat Ullah	DHO Mansehra	DHO Mansehra	Do-
23.	Muhammad Ajmal S/O Muhammad Haroon	DHO Abbottabad	DHO Abbottabad	Do-
24.	Shakeel Alam S/O Shah Zaman	DHO Mansehra	DHO Mansehra	Do-
25.	Muhammad Shabir S/O Muhammmad Afzal	DHO Mansehra	DHO Mansehra	Do-
26.	Habib ur Rehman S/O Abdur Rehman	DHO Abbottabad	DHO Abbottabad	Do-
27.	Umar Farooq S/O Wajahat Hussain	DHO Abbottabad	DHO Abbottabad	Do-
28.		DHO Mansehra	DHO Mansehra	Do-
29.		DHO Mansehra	DHO Mansehra	Do-
30.		DHO Abbottabad	DHO Abbottabad	Do-
31.		DHO Abbottabad	DHO Abbottabad	Do-
32.	. Malak Aman S/O Taj Muhammad	DHO Abbottabad	DHO Abbottabad	Do-
33.	. Sher Ali Baz S/O Ghulam Nasiruddin	DHO Lakki Marwat	DHO Lakki Marwat	Do-

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34.	Abdur Rauf Shah S/O Zulfat Shah	DHO Mardan	DHO Mardan	Do-
35.	Muhammad Israr S/O	DHO	DHO	
	Muhammad Ghayyas	Peshawar	Peshawar	Do-
36.	Naeemullah S/O			•
	Muhammad Ullah	DHO	DHO Charsadda	Do-
	Khan	Charsadda	Charsadda	
37.	Alam Zeb S/O	DHO		Do-
57.	Abdur Rashid	Mardan	DHO Mardan	
38.	Shaheen Iqbal S/O			Do-
50.	Zarwali Khan	DHO Karak	DHO Karak	D0-
39.	Said Rahim S/O	DHO	DHO	
<u> </u>	Gul Muhammad	Malakand	Malakand	Do-
40.	Mir Abad ur Rehman			
40.	S/O	DHO Karak	DHO Karak	Do-
	Amal noor	Dilonan		
41.	Amina Khatoon D/O	DHO	DHO	
41.	Meher Dil Khan	Nowshera	Nowshera	Do-
	Wazir Zada S/O	DHO Dir	DHO Dir	
42.			Upper	Do-
	Manadar	Upper DHO	DHO	
43.	Tariq Mehmood S/O		Abbottabad	Do-
ļ	Muhammad Fareed	Abbottabad	Automatian	
44.	Zuhria Begum D/O	DHO	DHO Mardan	Do-
L	Malik Fazli Subhan	Mardan	DHO	
45.	Tawheed Begum S/O	DHO	Nowshera	Do-
L	Ashraf Khan	Nowshera	Nowsheld	
46.	Taslim Akhtar S/O	DHO Swat	DHO Swat	Do-
	Muqaddar Jan	DHO	DHO	
47.	Yasmin Ali Shakir S/O	Peshawar	Peshawar	Do-
<u> </u>	Fida Ali Khan	Pesnawai		
48.	Ikram Khan S/O	DHO Bannu	DHO Bannu	Do-
	Aman Ullah	DHO	 	
49.	Amina Bibi S/O	DIKhan	DHO DIKhan	Do-
	Qazi Raza Muhammad Shafiullah Khan S/O			
50.		DHO Bannu	DHO Bannu	Do-
L	Muhammad Din	DHO Upper	DHO Upper	
51.	Fazle Subhan S/O	Dir	Dir	Do-
	Aziz ul Karim Muhammad Ajmal S/O			
52.	Muhammad Ajihar 3/0 Muhammad Umar	DHO Bannu	DHO Bannu	Do-
	Inamullah S/O	·		
53.		DHO Bannu	DHO Bannu	Do-
	Hayat Khan Muhammad Inayatullah		<u></u>	
54.	Muhammad Inayatulian S/O	DHO	DHO Shangla	Do-
	S/O Muhammad Samiullah	Shangla		
<u> </u>	Marwatullah S/O			
55.	Marwatulian S/O Muhammad Zaman	DHO Bannu	DHO Bannu	Do-
<u> </u>	Muhammad Aman S/O	DHO Dir	DHO Dir	
56.	Muhammad Aman 5/0 Khista Khan	Lower	Lower	Do-
	Shela Yasmeen S/O	DHO		
57.	Muhammad Zubair	DIKhan	DHO DIKhan	Do-
	Said Ahmad Khan S/O			
58.	Muntaizr Khan	DHO Buner	DHO Buner	Do-
	Muhammad Rehman	,		
59.	Munammad Kenman S/O	DHO Swat	DHO Swat	Do-
	Rehman ud Din	DITO OWAL	Dire Office	
60.	Irfanullah S/O			
00.	Asfandyar	DHO Swat	DHO Swat	Do-
61.	Muhammad Faqir S/O		· · · · · · · · · · · · · · · · · · ·	
01.	Gul Farooq	DHO Swat	DHO Swat	Do-
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62.	Nighat Yasmeen S/O	DHO	DHO DIKhan	Do-
	Khuda Baskhsh	DIKhan		
63.	Umar Farooq S/O	DHO	DHO	Do-
	Usman Ghani	Malakand	Malakand	
64.	Javed Ahmad S/O	DHO Dir	DHO Dir	Do-
	Fazal Rahim	Lòwer	Lower	
65.	Fazle Amin S/O	DHO	DHO	Do-
	Abdul Hanan	Malakand	Malakand	
66.	Jehangir Shah S/O	DHO	DHO	Do-
	Said Johar Badshah	Malakand	Malakand	
67.	Ghulam Akbar S/O	DHO	DHO	Do-
	Malook	Malakand	Malakand	
68.	Bashir Ahmad S/O	DHO Swat	DHO Swat	Do-
	Muhammad Fayyaz	DHO Swat		
69.	Khurshid Afreen S/O	DHO Dir	DHO Dir	Do-
	Saif ur Rehman	Lower	Lower	
70.	Alamzeb S/O	DHO	DHO	Do-
	Ghulam Rabbani	Mansehra	Mansehra	
71.	Ghulam Murtaza S/O	DHO	DHO	Do-
· · · ·	Muhammad Suleman	Abbottabad	Abbottabad	
72.	Muhammad Jamil S/O	DHO	DHO	Do-
	Abdul Qayyum	Abbottabad	Abbottabad	
73.	Syed Iqtidar Ali Shah	DUO	DHO	
	S/O	DHO .	Peshawar	Do-
	Sadaqat Hussain	Peshawar	I CSilavvai	
74.	Saeedullah S/O	DHO Swat	DHO Swat	Do-
	Molvi Zardad	DHO Swat	DITO Dinat	
75.	Nawab Khan S/O	DHØ Bannu	DHO Bannu	Do-
	Jama Khan			
76.	Izhar Ahmad S/O	DHO	DHO	Do-
	Nisar Ahmad	Peshawar	Peshawar	

N.B: Arrival/ Departure should be submitted to this Directorate for record.

Sd/xxxxx Director General Health Services, Khyber Pakhtunkhwa Peshawar

No.3382-48/(Promotion Cell) Dated Peshawar the 27/05/2021 Copy forwarded to the:-

- All DHOs of Health Services in Khyber Pakhtunkhwa. 1.
- 2.
- Accountant General Khyber Pakhtunkhwa Peshawar. All District Account Officers in Khyber Pakhtunkhwa 3.
- Deputy Director (Paramedics), DGHS, KPK, Peshawar. 4.
- PA to DG Health Services Khyber Pakhtunkhwa Peshawar. 5.
- 6. Official Concerned.
- Suptt: Promotion Cell, DGHS, KPK, Peshawar. 7.
- Personal Files. 8.

. For information and necessary action.

Directorate General Health Services, Khyber Pakhtugkhwa Peshawar.



DISTRICT HEALTH OFFICER SWAT AT GULKADA. Phone No. 0946-9240139, Fax No. 0946-9240215 Email. edohswat@yahoo.com

Dated 28 / 5/2021.

OFFICE ORDER

In the light of Director General Health Services Khyber pakhtunkhwa Peshawar Order NO.3382-484/Promotion Cell,Dated.27.5.2021,Mr.Bashir Ahmad Chief PHC; Technician (MP) BPS-16, is hereby adjusted/ Posted against the Newly upgraded post of Chief PHC;Technician (MP) BPS-16, at DHO, Office Swat, with immediate effect in the best interest of public.

Arrival Report Should be submitted to this office for record.

Sd/-DISTRICT HEALTH OFFICER DISTRICT SWAT AT GULKADA

NO. 7146-51/M.1/P.

Copy forwarded to the;-1-Director General Health Services KPK Peshawar for information Please 2-District Accounts Officer District Swat. 3-Divisional Monitoring Officer District Swat. 4-Account/DHIS section of this office. 8-Official Concerned. For Information and necessary action Please.

DISTRICT HEALTH OFFICER DISTRICT SWAT AT GULKADA

SHARIF.

The District Health Officer Swat At Gulkada.

"C" -26-

bject; - Arrival Report as Chief PHC Technician (MP) Bps 16.

Reference District Health Officer Swat Order No 7146-51 / M.I/P dated 28.05.2021. I hereby submit my arrival report for duty as chief PHC technician (MP) Bps 16 to district health officer office forenoon today dated 28.05.2021.

Kindly accept my arrival report I shall be very thankful and obliged.

Bashir Ahmad Chief PHC tech (MP) /Bps 16 Store Keeper Main Store DHO Office Swat at Gulkada.



/P/M.I.

DISTRICT HEALTH OFFICER SWAT AT GULKADA. Phone No. 0946-9240139. Fax No. 0946-9240215 Email. edohswat@vahoo.com

Dated.

<u>03</u>16 /2021

The Director General Health Services Khyber Pakhtunkhwa Peshawar.

Subject:-R/Sir.

NO.

To.

CHARGE REPORT.

Reference your office Order NO.3382-484/Promotion Cell, Dated.27.5.2021 and this NO.7146-51/M.I/P,Dated.28.5.2021.

I have the honour to enclose herewith Charge reports (Arrival) in respect of

Mr.Bashir Ahmad Chief PHC; Technician (MP)BPS-16, attached to this office.

Submitted for information and further necessary action Please.

1813-17 /P/M.I.

SHARIF.

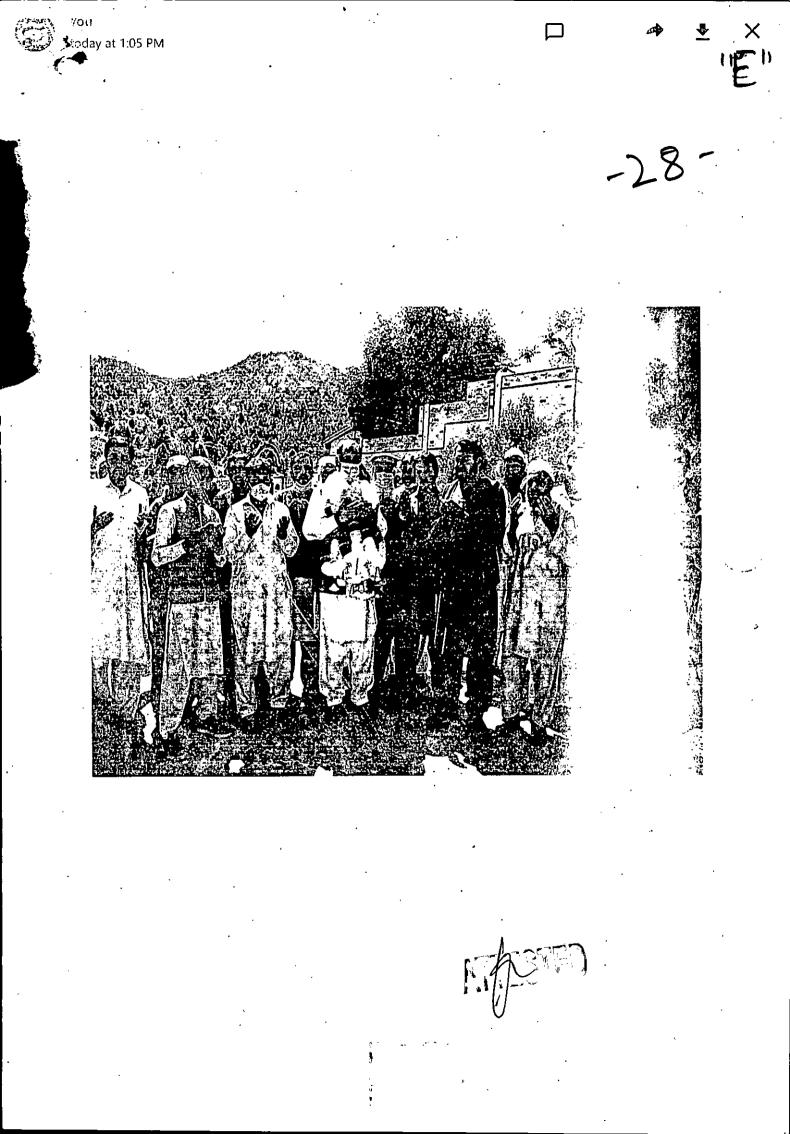
DISTRICT HEALTH OFFICER DISTRICT SWAT AT GULKADA.

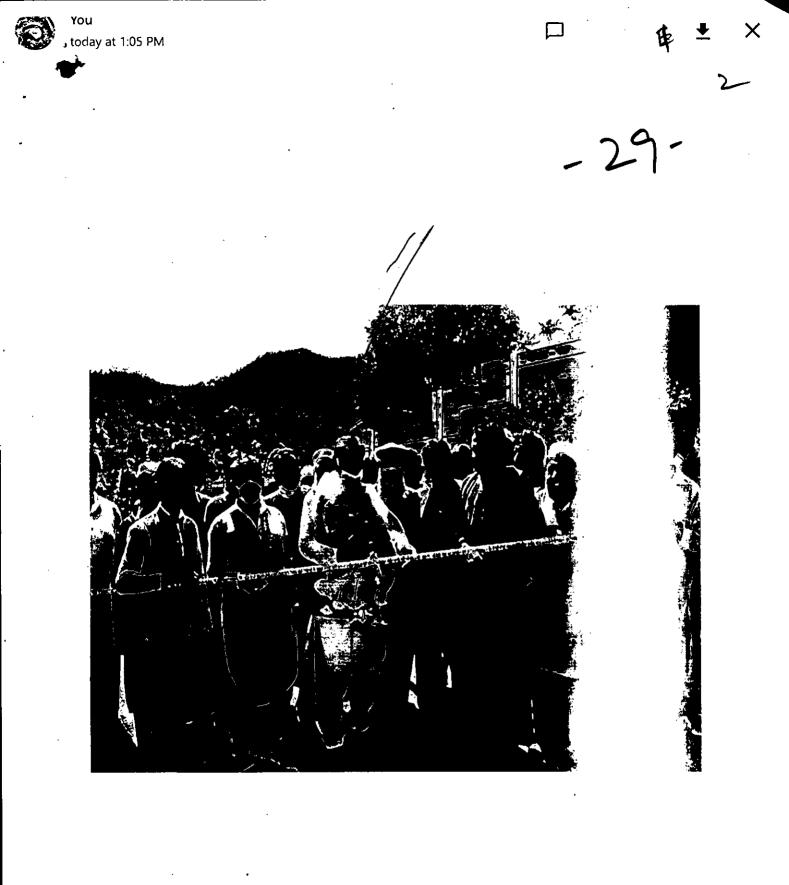
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5-Account /DHIS Section of this office.

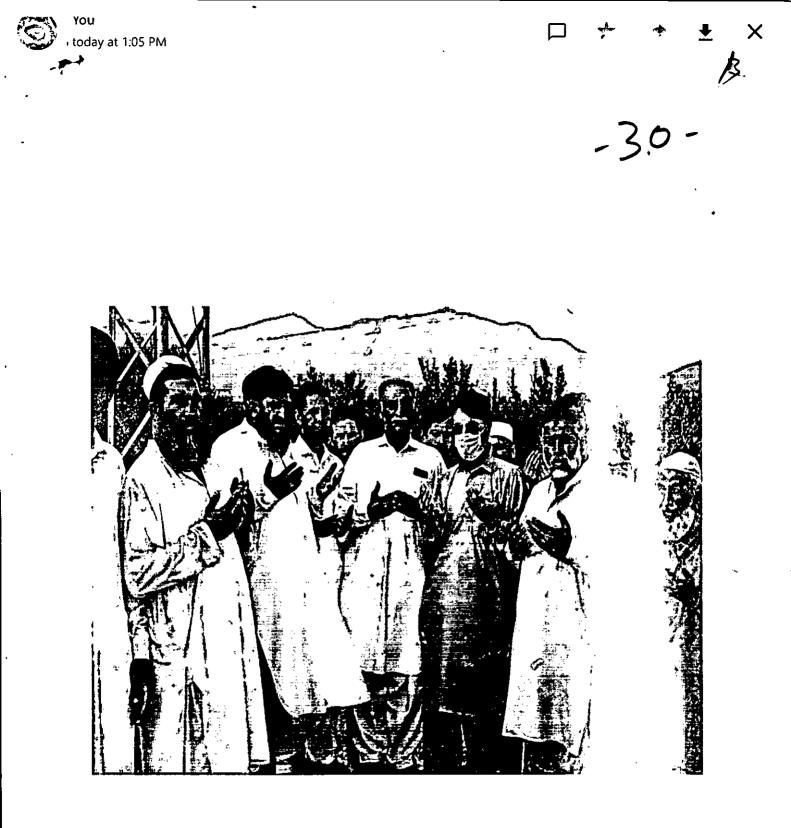
for information and necessary action Please.

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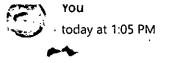
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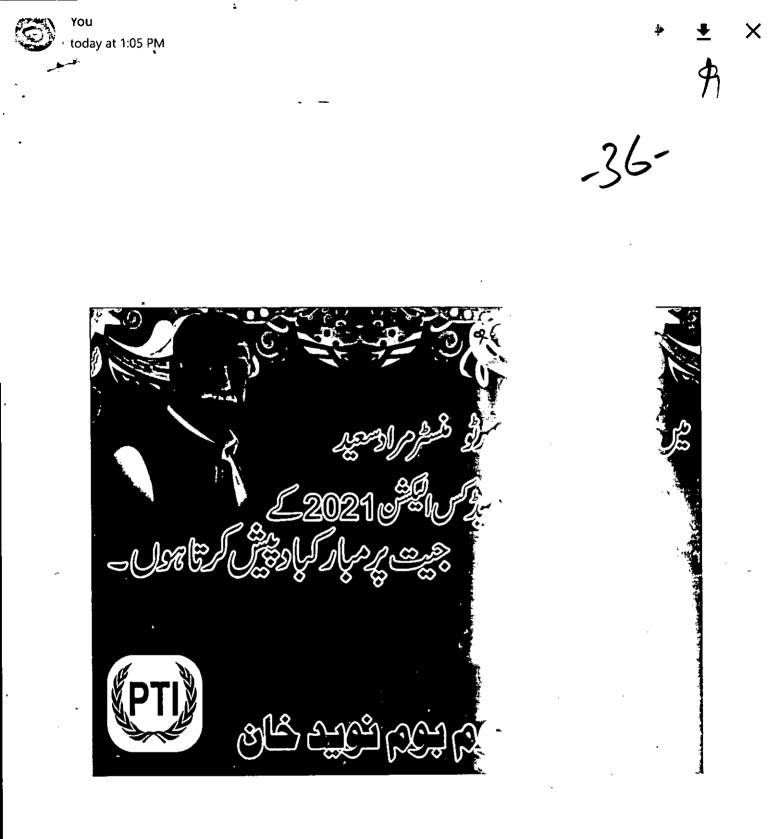


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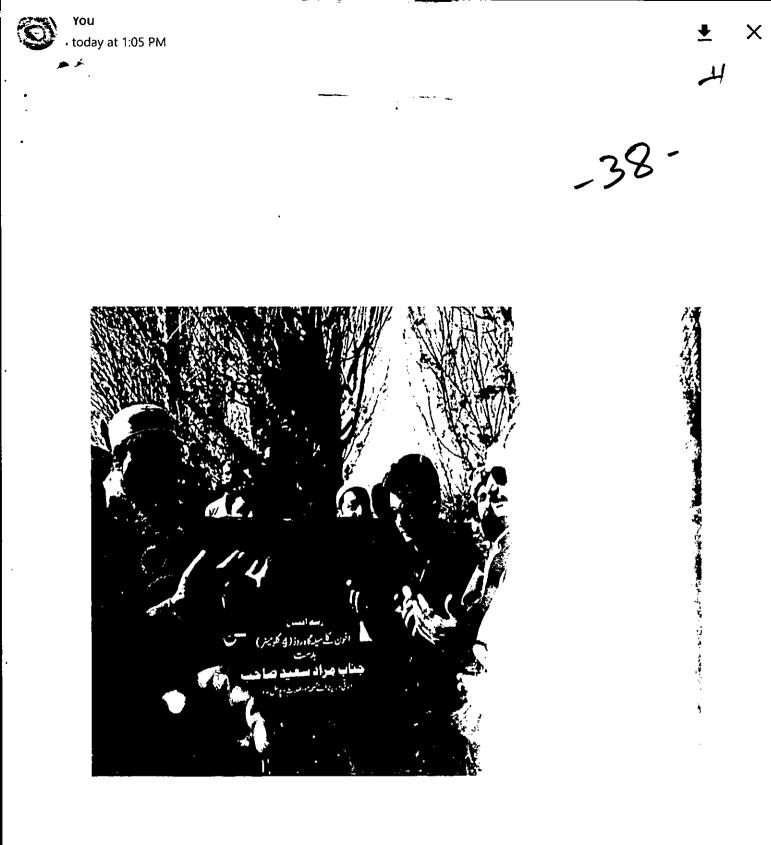


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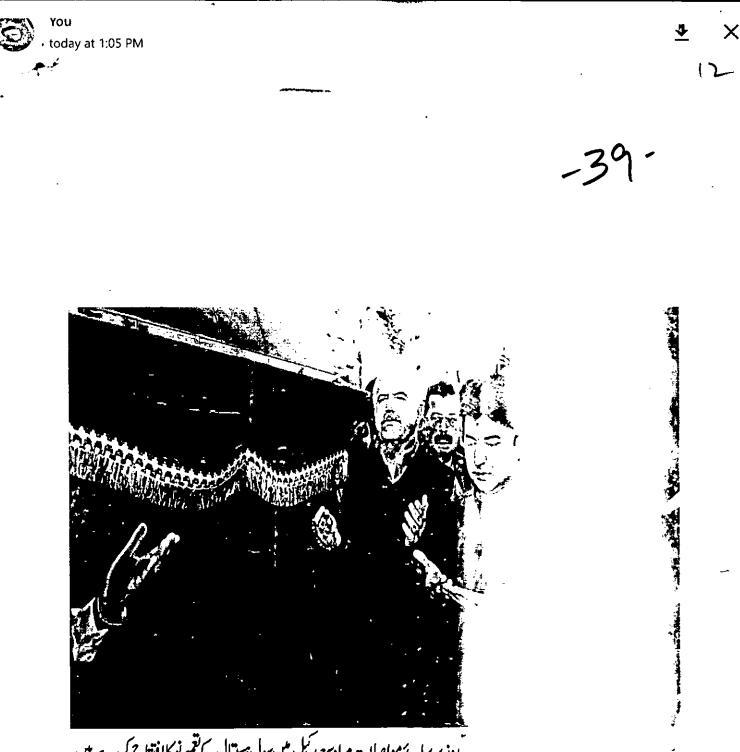




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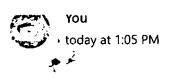
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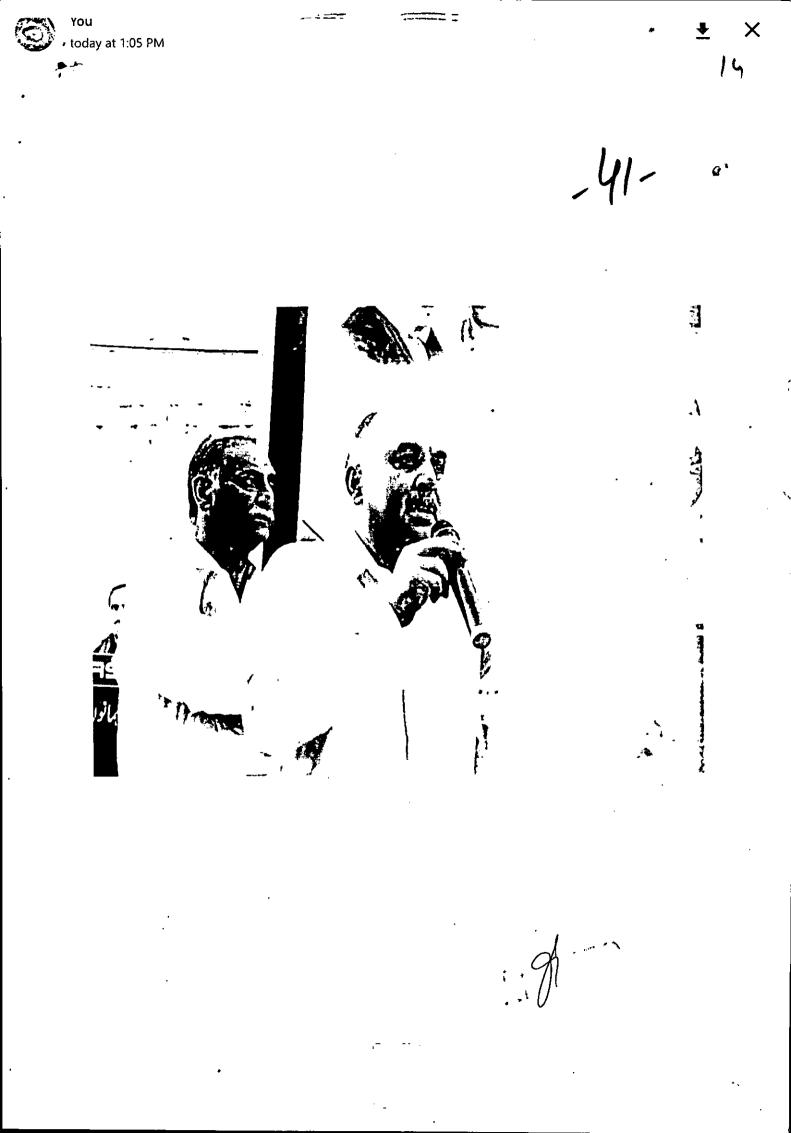
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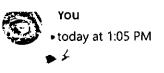
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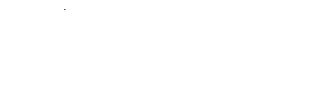




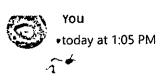
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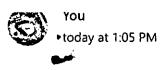
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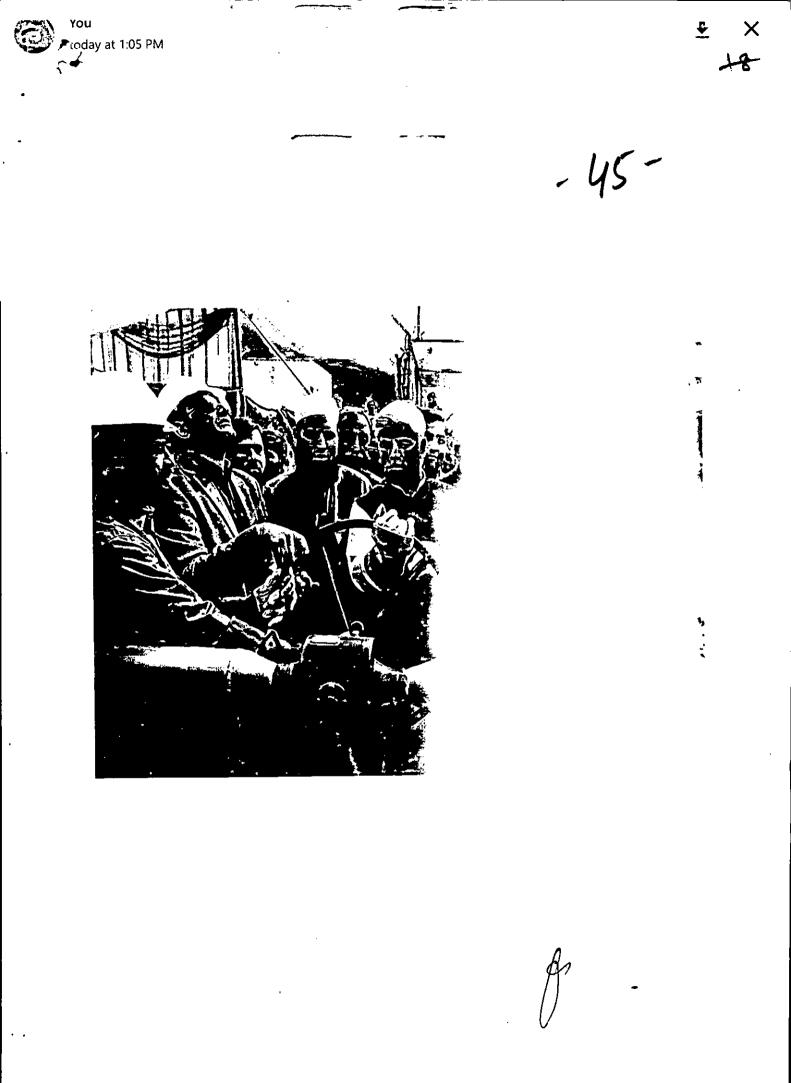


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OFFICE OF THE DISTRICT HEALTH OFFICER Gulkada ,Saidu Sharif SWAT. Phone No. 0946-9240139, Fax No. 0946-9240215 Phone No. 0940-9240-127 Email. <u>edohswat@yahoo.com</u> Dated. <u>71.</u> (2013. OFFICE ORDER As requested by Mr.Murad Saeed honorable. Member of National Assembly

As requested by Mr.Murad Saeed honorable Mender of Honorable Mender of Honorable NA-29 Swat-1, the services of Mr.Khurshid Ahmad Junior EPI Technician BHU:Sigram, is hereby placed at the disposal of honorable MNA as desired.

Sd/xxxxx DISTRICT HEALTH OFFICER * SWAT AT GUL KADA.

NO 4371-75

Copy forwarded to the:-

01- District Coordinator EPI Swat

02- Medical Officer I/C BHU:Sigram swat

03- Mr.Khurshid Ahmad JPHCT (MP) BHU:Sigram

04- Account Section of this office .

For information

OFFICER DISTRICT H AOA SWAT AT G

Copy forwarded to Mr.Murad Saeed honorable Member of National Assembly NA-29 Swat-1 for information please.

DISTRICT HEALTH OFFICER

<u>Rahman Ali/</u> 7/6/2013

No 4370

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OFFICE OF THE DISTRICT HEALTH OFFICER GULKADA DISTRICT SWAT

Phone No: 0946-9240139, Fax No: 0946-9240215 Email: <u>edohswat@yahoo.com</u>

No. / MPAs

Dated:/7 1/4/2018

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OFFICE ORDER

This office order bearing endost: No.437175/ MPAs dated 7/6/2013, regarding

placement of Mr.Khurshid Ahmad PHC Tech (MP) is hereby restored as directed by

competent authority .

NO

sd/xxxxx District Health Officer District Swat at Gulkada.

Copy forwarded to the: 01-District Coordinator EPI swat. 02-Divisional Monitoring Officer MKD Division swat 03-Account Section of this officer. 04-Mr.Khurshid Ahmad PHC Tech (MP) For information

District Health Officer District Swat at Qalkada

Copy forwarded to Mr. Murad Saced Minister of state for communication Islamabad .

District flealth Officer)

District Swat at Gulkada

Rahman ali

E ATTE AND CARL AND



Baramedical Association District Swat

President: Khurshid Ahmad G. Secretary: Sher Muhammad Khan

. میرامیڈیکس برادری کودر پیش احل سیسائل

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اس موقع سے فائد وافعاتے ہوئے ہم بی امیڈیکس برادری کودر پیش مسائل جس کے ابدومنداند طور پر مل ہونے پر محکم محت موات کے کاد کردگی كوبجتر منايا جاسكما بجن مى سى چتدايك چيده چيده ماكل درجد يل ب-۱) (LHV/PHC كودر بيش مراكل جس كى بابت PMA وات في ايد فايد عادة عادة LHV/PHC و اب سفارشات کے ساتھ جناب DHO ماحب کو پی کردین میں ۔اورجو کہ فیری افتدامات کے متعاضی میں پر مناسب احکامات جلد ازجلد مادرکردی جا تیں۔ ۲) درجه بالا م طرق EPI کیدرکودد چش سائل جو که جارفراف (یا فر م طور پر DHO ما دب کوچش کردید کی ب رجمی ضردری

كاردان مل ش لاياجات

٣) بیشترد بائن کوارٹرنا قامل رہائش ہونے کے باوجود ابلکاروں کے نام ناجا تزطور پرالاث شدہ ہاس سلسلے میں تنظیم تجویز چیش کرتی ہے۔ كدفتر محالمكارون اور يحقم مح فما يتدون يرمشتل جائزه كمينى قائم كردين جائين -تاكرة على ربائش اينا قاعل ربائش مح بابت ربود بيش كريحنا حائزالا شمنت يحمنوني كيليح قانوني كارداني عمل شرالاتي جاسيك

۳) DHO افس مے من سٹور میں کمی نامل اور متعاقد المکار کونتیزات کیا جائے تا کہ DHO افس کا بیا ہم شعبہ ورامیڈ یکس کی سیاست المرادف بجاماتك

۵) DHO انس سے طیر یا سیکشن جس سے دمدداری ڈینگی وغیرہ کے دباؤں پر قابو پانے سے اور بھی بڑھ کی ہے۔ لہذا طیر یا بے تمام PHC فیکنیطواس من بلااتیاز شال کیاجائ جبکه Microscopy رمعود المکارول کوفیلڈ دیو ٹی سے مستنی قرارد ، کرانعاف کے تلاصوں کو ہوما کیا جائے اور حزید یہ کہ طیر پانیکٹن کے انچارج شب کمی احل ادرکوالیغا ئیڈ دیرامیڈیکس کے حوالے کیا جائے۔ ۲) PPHI عير محمق شده المكارول فوم 2018 تالوم 2017 ميز تواجل دام زاركما جاند ٤) ورامیدیکس مے جاد فراہوی ایش محدور مدادر سفار شات کے تحت مل میں لائے جائے۔ اور سامی مداخلت کی ج

on Rashid Khan ar Ali Khan Dd Jamal Khan wakii Shah

1.30.04

Joint Sec Fin. Sec Office Sec

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Coord. Sec: Khuwaja Tariq Hussain Mohammad Alam Sardar Ali Khan ikram Khan

Contact PMA Sweet 0345-9516352,0300-5740316 DHO Office Gulkade Swat pmaswat.rf.gd pmaswat@gmail.com facebook.com/pmaswat

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President: Khurshid Ahmad G. Secretary: Sher Muhammad Khan

Date

۸) PMA سوات کی طرف = DHO سوات کو پش کرده درخواستون پرتا حال کی تم کی کاردانی مل جیس لا یے گئی ہے۔ لہذا مناسب کا ردالی مس ال کی جائے۔ ۹) PMA سوات کے اپند کا ماہاند میلنگ ہر مانے کم پہلے منگل کو PMA آفس میں منعقد ہونے ادرائی طرح کا بیند کا کوئی بھی ایک دکن ردزاند کے بنیاد ر DHO انس میں برادری کے خدمات کیلئے موجودر ہے گا۔لہذا DHO ما حب توٹ فرما کراس بابت مزدری انح ری ادکا مات مرادد کریں۔ امید - DHO ما حب آج کاس اجلاس کوتاریخی بنا کردرجد بالا مسائل سے مل میں فیری ادر منصفاندا دکاما قسا در فرما کر PMA سوات ادر جمل براميديك برادرى كوسطكوردمنون بتائي 2-

مخانب:PMA سوات

SHER MUHAMMAB KHAN General Secretary PMA Swat

CABIN SVP: Haroon Rashid Khan VPI: Akhtar Ali Khan VPII: Arshad Jamal Press S Nasir Khan Ad. CS S Syed Wakil Shah

Coord. Sec: Khuwaja Tariq Hussain Joint Sec: Mohammad Alam Fin. Sec: Sardar Ali Khan Office Sec: Ikram Khan Contact PMA Swat 0345-9516352,0300-57403 DHO Office Gulkada Swat pmaswat.rf.gd pmaswat@gmail.com facebook.com/pmaswat

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President: Khurshid Ahmad G. Secretary: Sher Muhammad Khan

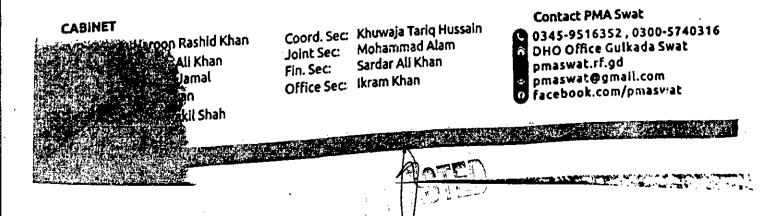


-Réf ______ Date <u>28/04/202</u>/

محصور جناب ومرارح معفية ميز ويجس عمام كل كرره ميروز مع

منوين :- تماعد وقالون بدما ورا احما ماست بم عمد مرار 28- 5973 كو فررى طور ميرسنوخ كمبية الدمليس؟ مسكين سے مام نهاد، ماديس رور ليرم 274 40 افرادتو مغري لمورمير كارغ تمرع اور الفي المسل تورسط ميرواليس لتحييا

فا ملى ! اب مناحب كى لترم د فترى وحكامات مذمكر و زميمزوان بالا م وف مدرول مرايى ماتی مع اور ماد دلایا جا تا بع مراکمیوی دلین غاطیم محت کو معدی اور معاددت عام کر سیسی نظر محد مراب محاطب سے حرا مارچ مدود کو مونے والے مشیق کے دورتان نزم مرجد است مع مع مع مع مع مع مع مع من مع من مع من من مع المرابعة علي مرجلي الدرسي ممامان غراليان مرتد سول المينا شيكم مردى فامردى فلا مى اورامبرازال زم مستنب ميش مارى كريدى درفردست كافي - اورممرازون اب مناحل لاءة و زمراعا مات بمر عرام دودو بعنت والعيفا ميد عدا مدامين ما معنيان عمر من لائي في - ليس اب مرمر العنامات مذكر و عنوان مالاً مساز شي



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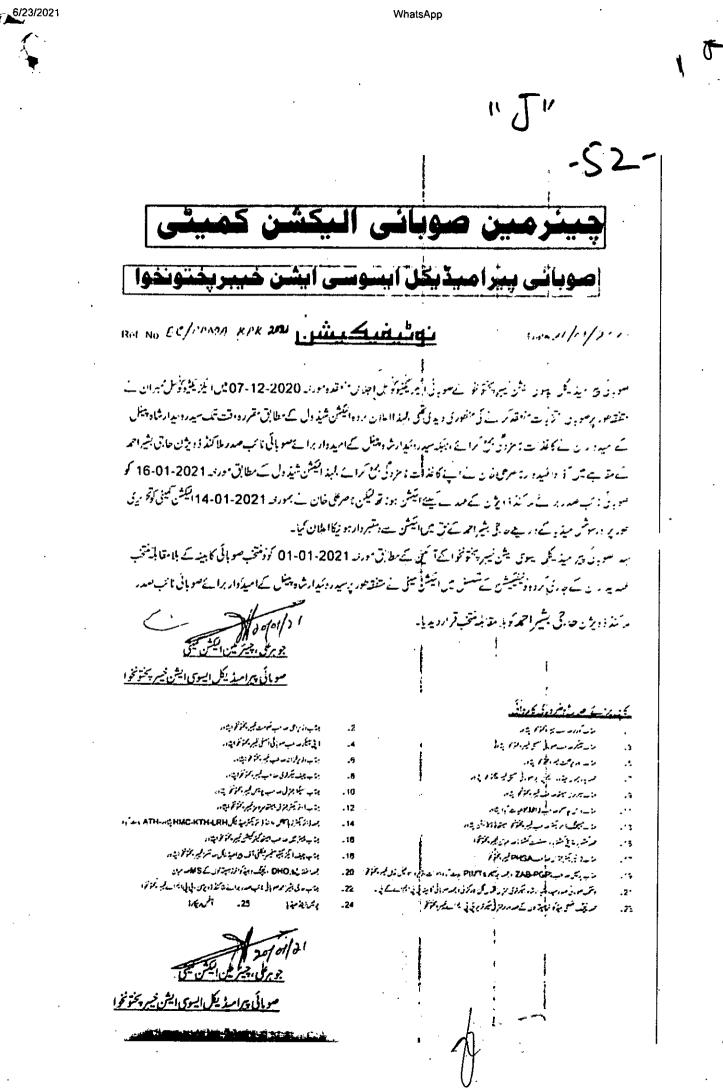
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President: Khurshid Ahmad G. Secretary: Sher Muhammad Khan

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OFFICE OF THE DISTRICT HEALTH OFFICER GULKADA DISTRICT SWAT Phone No: 0946-9240139, Fax No: 0946-9240215

Email: edohswat@yahoo.com

Dated.02-07-2021.

OFFICE ORDER.

Dr.Sajjad ur Rehman (Medical officer BPS-17) Deputy Medical Superintendent THQ Hospital Matta Swat is hereby directed to perform duty as I/C District Medicine Store/Procurement officer in his own Pay scales till further order

Subsequently Mr. Bashir Ahmad Chief PHC Technician Store keeper is hereby relieved from DHO Office Main store and directed to perform his duty against in his original post.

DISTRICT HEALTH OFFICER, DISTRICT SWAT AT GULKADA.

No: 9816-20 /DHO/.

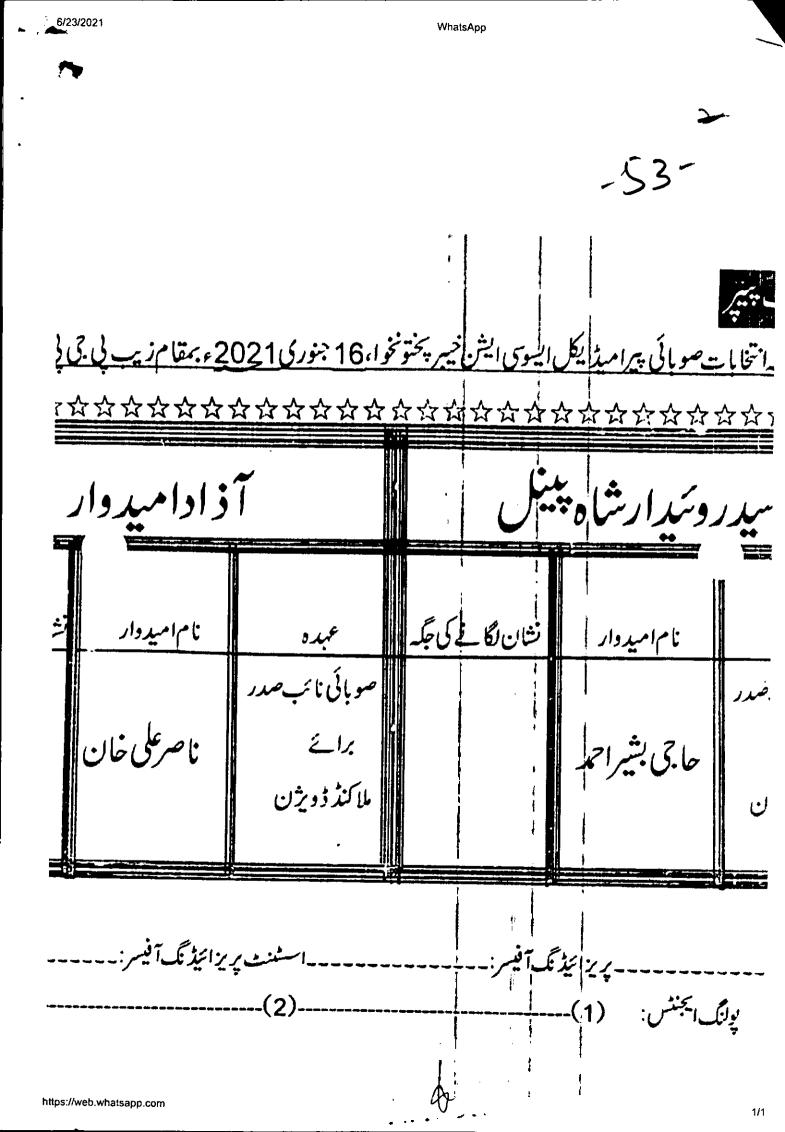
Copy forwarded to the:-

1. Deputy Commissioner Swat

- 2. PA to Director General Health Services Khyber Pakhtunkhwa Peshawar
- Above Name Official concern for information and compliance
- 4. Account Session of this office
- 5. Office file

DISTRICT HEALTH OFFICER, DISTRICT SWAT AT GULKADA.

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OFFICE OF THE DISTRICT HEALTH OFFICER GULKADA DISTRICT SWAT Phone No: 0946-9240139, Fax No: 0946-9240215

Email: cdohswat@yahoo.com

OFFICE ORDER

Dr Sajadur Rahman (Medical Officer BPS-17) Deputy Medical Superintenhdent THQ Hopsital Matta swat is hreby directed to perform duty as I/C District Medicines Store/ procurement officer in his own Pay scale till further order.

Subsequently Mr.Bashir Anmad Chief PHC Technician (Multipurpose)/Store keeper and Mr. Umar Habib C7 Pharmacy/ Store keeper are hreby directed to hand over the charge to the above name officer concerned and both the store keepers are directed to perform duty under his supervision with immediate effect and in the best interest of public services.

Salx DISTRIC SEAL. 1 DEFICER DISTRICT SWAT

Dated: 301 1 2021.

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No. 9670

Copy of the above is forwarded to the above named

officer/official concerened for information and compliance.

SALCE:

DISTRIC . HE TO THOSE ICEP DISTRIL SWAF

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BETTER COPY 55

OFFICE OF THE DISTRICT HEALTH OFFICER

S.

GULKADA DISTRICT SWAT

OFFICE ORDER:

Dr. Sajadur Rahman (Medical officer BPS-17) Deputy Medical Superintendent THQ Hospital Matta Swat is hereby directed to perform duty as I/C District Medicines store/procurement officer in his own pay scale till further order.

Subsequently Mr. Bashir Ahmad Chief PHC Technician(Multipurpose)/Store Keeper and Mr. Umar Habib CT Pharmacy/Store Keeper are hereby directed to hand over the charge to the above name officer concerned and noth the store keepers are directed to perform duty under his supervision with immediate effect and in this best interest of public service.

Sd/-

District health Officer

District Swat

No. 9670/

No.

Dated: 30.06.2021

Copy of the above is forwarded to the above named officer/official concerned for information and compliance.

Sd/-

District health Officer

District Swat

Copy of the above is forwarded to the:

- 1. Deputy Commissioner Swat
- 2. Director General Health services, Khyber Pakhtunkhwa Peshawar For information Please

-56-بعدالت جناب سينئرسول جج صاحب/ اعلى علاقه مر عدي اردن) مولى الملاقة كامني بشيراحمه دلدمحمه فياض ساكن محلَّه آ فسرآباد، كالح كالوني ،سيد دنثريف بخصيل بابوز أي ضلع سوات 0,7 2.20 Y مدى ايم 151 -7871 ايش ضلع سوات ٹ ہنیلتھ**آ فی**سر سوات بمقام گلکد ہ جسلع VR Long N دعویٰصدور د گری بمراد : ۔ استقرار صبرین مراد که ما مدی محکمه ہیلتھ میں بحیثیت PHC Cheif Technician / Store Keeper تعینات بے اور این ڈیوٹی ایمانداری اور آفنران بالا کے منتاء کے مطابق سرانجام دیں رہاہے۔ مد عاعلیہم مجاز نہیں کہ دہ اس امر اور حقیقت سے انکار کریں ۔اور اسی طرح به عاعلیهم مجازنه بین که وه خودساخته طور پرصرف اور صرف سیاسی اثر رسوخ اور E bergin مدعاعلیہم کی اپس میں سازباز اور گھ جوڑ کر کے مامدی کو اپنے پوسٹ سے برخاست/ ہٹائے یاکسی دیگر جگہ تبادلہ کریں (یا اگر کی ہوتو وہ جس سے کہ انکار ہے) تو وہ حفوق ربطی پر کالعدم دغیر مئوثر ہوتے ہوئے قابل منسوخی ہے۔ اگر <جـاری هے﴾

ناب عالی! دعویٰ مدع حسب ذیل ہید کہ مدعی پاکستان کے پرامن شہری ہےادرصوبہ خیبر پختواہ ضلع سوات کارہائش ماشندہ ہوں۔ به كه مارى محكمه صحت مين بحيثيت Cheif PHC Technician / Store **Keeper تعینات ہے۔ مدعی نے ابتداء ہی سے اپنی ڈیوٹی انتہا کی ایمانداری ادرآ فسران بالا** کے منشاء کے مطابق سرانجام دی ہے۔(کوائف مدعی لف دعویٰ مذاہے) بیرکداب مدعاعلیہ نمبر2 نے بلا اختیار، خودساختہ طور پرجعلی، فرضی ، بدنیتی اور سازش طور پر مامدی کونقصان رسانی اور مامدی کو مذکورہ عہدے/سٹور کیپر سے ہٹانے کے یں انٹی از صلح ایر از رسوخ اور بہ ایماء وسازش مدعاعلیہ نمبر 1 کاروائی کرنے کے درپے ﷺ)۔ ﷺ)۔ (جس کی صحت سے انکارہے) جس کے تحت مدعاعلیہ نمبر 2 مامد عی کواپنے سٹور یپر کے پوسٹ سے ہٹا کر تبادلہ کرنے کے دریے ہے جس کے دہ ہر گزیجاز نہ ہیں۔ میرکه مدعاعلیهم کی جمله کاروائی مامدی کے حقوق پر کالعدم اور غیر موثر ہو جریز الاطل کا منسوخی ہے کیونکہ مدعی کی پوسٹ پر تا حال کسی دوسر فصحف کو تعین اللہ کیا گیاہے جو کہ تا حال خالی ہے جس سے کہ مدعاعلیہم کی بدنیتی صاف ظلہ کر یہ کہ مدعی صوبائی پیرامیڈیکل ایسوسی ایشن خیبر پختوانخواہ کے ملاکنڈ ڈویژن کا صوبائی نائب صدر ہے اور مدعاعلیہ نمبر 1 سوات پیرامیڈیکل ایسوی ایشن کا صدر ے۔ مدعاعلیہ نمبر 1 نے ایک درخواست / کمپلینٹ برائے انگوائری برخلاف مدع مدعاعل ہنبر 2 کودیا تھا جس کو مدعاعلیہم نے خفیہ رکھا ہے اس کو منظرعام پر لایا جائے تا کہ مدعی کو بھی حقیقت معلوم ہو کر عدالت حضور کے روبر و اصل حقائق سامنے آ جائے۔ اسی وجہ سے مدعاعلیہم نے اپس میں سازباز کرکے مدعی کوا کیک طرف ذہنی

﴿جــارى هـــٰ﴾

مد عاعلیہ نمبر 2 نے کوئی بھی ایسی کا روائی بشکل لیٹر دغیرہ جاری کی ہوتو دہ بھی مامد کی کے حقوق پر کالعدم دغیر مئوٹر ہوتے ہوئے قابل منسوخی ہوگا۔

- 58-

:0/

وصدور ذکری تحم امتناعی دوامی بدین مضمون که مدعاعلیم کو مامدی کے خلاف ہر شم کی کاروائی بشکل مامدی کو پوسٹ سے ہٹانے/ برخاست کرنے، مامدی کے خلاف کوئی کیموں خود ساختہ کاروائی کرنے سے بازوممنوع رکھا بھی خود ساختہ کاروائی کرنے سے بازوممنوع رکھا جاوے۔اورای طرح اس نبیت ہر شم کم نامہ جاری کرنے سے باز دمنوع رہیں۔

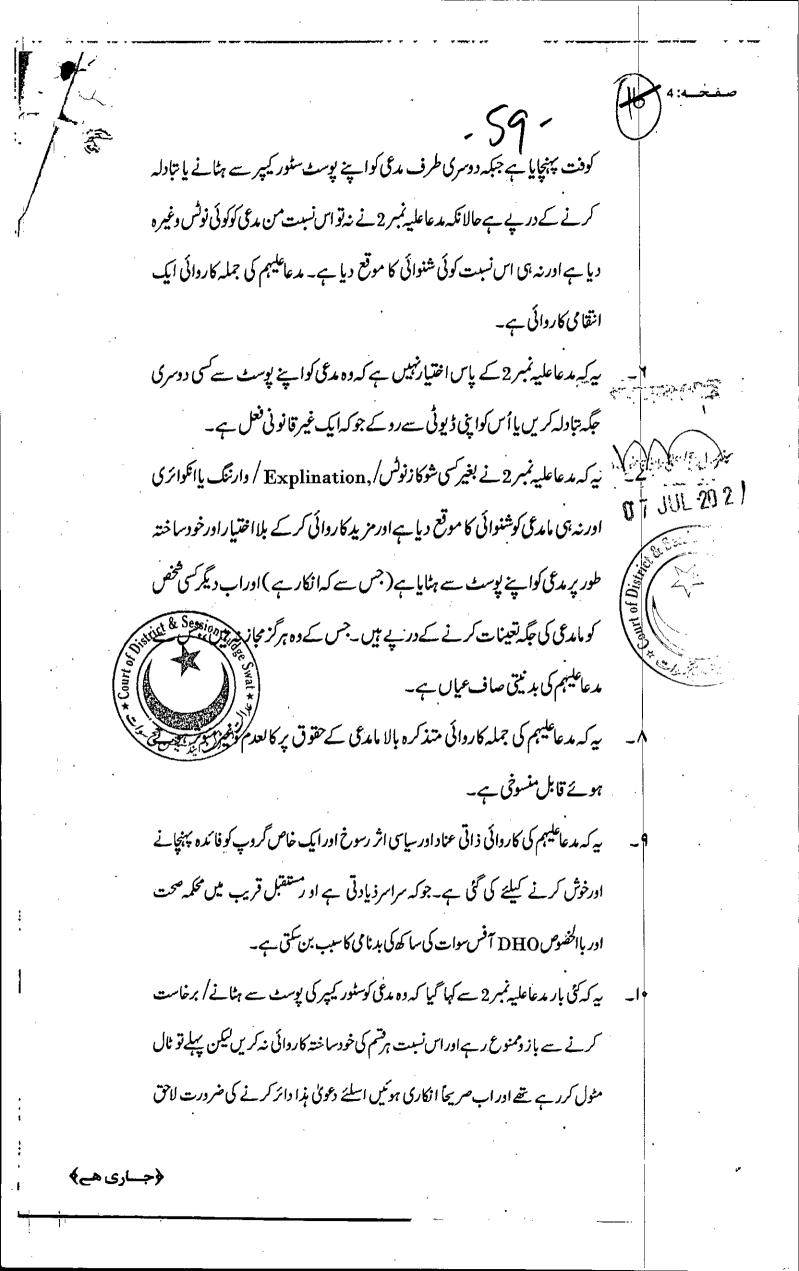
وصدورتکم تا کیدی که بدین مضمون که مدعاعلیم کو مدایت کی جادے که مامد کی کو متعلقه پوسٹ پر تسلیم کر کے کسی دیگر شخص یا اشخاص کو مامدی کے پوسٹ پر تعینات کرنے/ لیٹر جاری کرنے سے باز وممنوع رکھا جادے۔

د: دیگردادری جوقرین انصاف ہوعدالت حضور ہوبھی مرحمت فر

مالیت بغرض کورٹ فیس مبلغ دوصدرویے مقرر شد۔ نیز کمی بیشی حسب الحکم عدالت حضور یوری کی جائیگی ۔

بنائيج دعوكي مذاچند يوم قبل بعدازا نكار مدعاعليهم اندر عدود دائر ه اختيار ساعت عدالت حضور يداشداج دائر كي جاربى بجوكها ندرميعاد ب-

(جاری ہے)



N.C. 60-1. 20 ہوئی۔ یہ کہ مالیت دعویٰ بغرض کورٹ فیس واختیار ساعت بنائے دعویٰ درج بہ عنوان عرضی دعویٰ __(f. ہے۔دعویٰ مدعی اندر میعاد ہے اور عدالت حضور کو اختیار ساعت حاصل ہے۔ ۲۱۰ میکهدائری مقدمه ادعوی سی قبل تمام قانونی امورکی تحمیل کی گئی ہیں۔ (نقولات لف بیں) And And States وعولی حجق مدعی برخلاف مدعاعلیہم صادر فرمایا جائے ۔ د میردادری جوقرین انصاف ہوبھی مرحت فرمائی جائے۔ تصديق کی جاتی ہیں کہ جملہ دعویٰ میر یے علم و عزیض کے ینین کے مطابق درست وضح ہے کوئی امرمخفی یا پوشیدہ نہیں رکھا گیا ہے۔ مدعی ۔۔۔۔۔ بشیر احمد & Session J s_____ مدعى _____براحمد بوكالت فضل سجان ایژ دو کیٹ ہائی کورٹ

-61-6:4 بعدالت جناب سينترسول جج صاحب/ اعلىٰ علاقه قاضى صاحبٌ سوات -- مدعى وغبره دعوى صدورة كرى استفر ارتق وغيره درخواست بمرادعطا نیگی عارضی تظم امتناعی بدین مراد که مسئول الیهم/ کر اط n / p : 2021 مامدی/سائل کے خلاف ہوشم کی کاروائی بشکل متعلقہ پوسٹ سے ہٹانے/ برخاست کرنے، ماری کے خلاف کوئی بھی خودساختہ کاردائی کرنے غرض ہوشم کی کاردائی کرنے سے باز دممنوع رکھا جاوے ادراس طرح اس نسبت ہوتتم تھم نامہ جاری کرنے سے باز دمنوع رہیں۔ جناب عالى! درخواست ذيل عرض ب. یہ کہ دعویٰ عنوان بالا عدالت حضور امیں آج دائر کی جاتی ہے۔ جس ہیں تا حال کوئی تاريخ پيشى مقرر نەپے۔ ہیہ کہ مسئول الیہم/ مدعاعلیہم من سائل/ مدعی کی جگہ کسی دیگر شخص کو تعیینات کرنے کے دریے ہیں۔

. 62 جس کے وہ ہر گز مجاز نہیں ہیں۔ سیکہ مدی/سائل کے حق میں بادی النظر میں قوی مقدمہ موجود ہے۔ یہ کہ قانون توازن سہولت بھی مدع/ سائل کے حق میں ہےاور دعویٰ مدع/ سأئل كوجز درخواست بذاتصور مور of Distric بیه که اگر تحکم امتناعی عارضی متدعیه صا در نه کیا گیا تو مدع / سائل کو نا قابل Court o. تلافى نقصان ہو گا جبکہ بصورت متبادل مدعاعليهم/مسئول اليہم كوكوئي نقصان نہ ہے۔ عارضی اعتناعی برخلاف مدعاعلیہم حسب استدعا صادر فرمایا Harnon چائے۔دادری ہوگی۔ n / Jui 2021 بيان خلفى: حلفابيان كياجا تاب كهجمله مراتب بالادرخواست مدحى هذادرست ادرسيح بين ادركوئي امرمخفي عدالت حضور ہے ہیں رکھے گئے ہیں۔ العد

-63- (**)8:4 بعدالت جناب سينئرسول ج صاحب/ اعلى علاقه قاضي ص 51 بنا ⁄ District & Jession دعوى صدورد كرى استقر ارحق وغيره ميذم إ 2021 بيان حلفي حلفاً بیان کرتا ہوں کہ جملہ مراتب دعویٰ ھذامیر ےعلم ویقین کے مطابق درست وضح ہیں ۔کوئی امر الخفى يا پوشيده نہيں ہيں اور نہ مدى نے برخلاف مدعاعليهم اى نوعيت كامقدمہ پاكستان كے كى دوسرى مجاذ عدالت میں دائر کی ہےاور نہ زیر ساعت ہے۔ لہذا بیان حلفی سندا تحریر ہے۔ مدعى----بشيراحم

12025A2-A and the de the set of the de de stimes 1-nd - controller sold - - con sign moi-- com al month in pol en inter on the constant gronp Vizeo costi Action Osti Vizeo costi Vizeo - achar- m. 1. 2/2/2-3026-Pours (inin dir in Alibor in p 0-10-10 ر میشد سول جج / اعلی علاقه قاض سواع ت ايم در لغولة ترالد للوار (للينسب) في ماي بسليلة (maf (9m)) سمالکھڑا الج_راہی آپار ا 120212120 وعرابة المراجعة في 0 -----سفاریک^{اض} آیدن ایسید روید ب نوب کا جوره ایر و میک کل^اناف یک بیا <u>ا</u> 61 NI Stall لرہ: ت، اهبه، ريحفلة مةلك ريكيار، لشية مع) عبي رامس بنينيس، رالمحماك المعالمجب بوت احکام



65-

Bashir Ahmad Vs Khurshid Ahmad etc

Plaintiff through learned counsel *Mr. Fazal Subhan Advocate* present. Admits & verifies the contents of the plaint to be true & correct. Be registered.

An application for grant of ad interim injunction is also annexed with the plaint. Arguments heard.

Plaintiff alleged that there is a malafide & colorful exercise on the part of defendants who illegally by using excessive power intends to remove the plaintiff from his post of Chief PHC Technician/Store Keeper.

or Judge S.

The documents appended with the plaint reveals that the plaintiff has an arguable case. There is nothing in rebuttal for the time being. Hence, ad-interim status quo is granted for 14 days is granted in favor of plaintiff subject to notice to defendants. Plaintiff is directed not to linger on the proceedings of temporary injunction application once the same is granted or else the ad-interim shall stand vacated.

Hence, notice of the same alongwith the copy of plaint and application be issued to respondents/defendants for 3 o 107/2021.

Meanwhile, proceedings of case management and scheduling conference are initiated. Relevant proformas under the provision of CPC rules be prepared for the date fixed.

Consel for plainting and day to 2 30-07-224 presned. Degt NO.1 in person presed uvitten statend - on behall of deprive-2 along with Reply and application 0 7 rule 10 cpc is submitted by Hu Agp(come). Placed on file Deft No 1 Songry-time for submission 9) mitter statent is enjoying coursel. Late on fresh w/N on behavy of Post supp Plining in the name of Advocales Vascon Amon is submitted by Plantin which is placed in file

67- (200 20 1212) æse file Requisited 31.07.2021 application of plainty, who pecking entension of ad-interim Torde earlier unled vide orde #= 03. Keques_ Seenes genuine thingon springue be maintaned for 14 days subject- to notice to opposite party or any Oher Contrany order of superior Camp. De pue up on fix date

-68-Churshid (13 Bashirudim The case in had IS 0-16 Fined for proceeding 12.8.21 on 07.9.2021 in the court of ci-v sb swat but to day the plaintift moved on application for extentional Session of intrim status que which reveals that the status que has already been greated, Hence the status que is extuded for cering pourteen days. case file be back to the Concerned Court: 1 ee J MEENA QAISAR Civil Judge/Illaqa Qazi Swat. Case file requisited on the application 25.08.2021 optusque as the statutory prived .-Civil Lage/Ilaya Gazi-U Judicial Magistrate, Sent.

-69ov de - 17 of 14 days has lapsed. The contin Request of Planting is acceded & the Atuque carlie proved and mainfaired time to time is hereby entended again fill the next date fixed subject to notice to opposite Party. Le puy-up on the date pixed Adr-18 Sadia Hardo Centesting parties Civil Judge/Illaqa Qazi-V Judicial Magistrate, Swat. 07-09.202 alang with cousels preset. W/N 1921) advocales Asim Mayeed & Muhanal Ver el Kergne along with white statemp and owli mitin reply of stay application is submitted by dept No-1 colincer is Haroon Placed on file. I pre trial campuse held af the V request of parties Kladay and panties alongloiter this caul were heard at great legth. At Carton-

- 70 - 70 - 70 - present there seems no chance) setternet - through any oller mode. Tanties have jointly requested for disposal of mist applications and next-date and Ohave the even no interest for foling and solver no interest for foling and solver new application. For this countr Carro for plaining No 1 nandes Asim Majeed has signed the and the before one of degron's also Consequently three deans n for schedulig og mist application 0/09-4 cpc and plainty) is directed to subout weither reply an applicate U) o Thule 10 Gpc (of deptaloz) With ru three daugs. De puer up for arques on 1- 2000. 0- 1-5... and meter Two applications inc. spieling to and The of planist on 15.08 - 2021. Stadia Ha Swat

71- (v= jo v stal) 9 Parties presing alongwin consels. Againsto 15.09.33 chead. Be put up for order applications one gal Refum -fee. Paring and other for interim reting) نړه . 2021. U Menufile splinguo 0 mied for (سعد یہ اربان) (سعد یہ اربان) ول تی (طلاقہ قاضی بنج)



<u>0-----20</u> 27.09.2021

IN THE COURT OF SADIA HAROON Civil Judge-V/Illaqa Qazi, Swat

.72

Suit No. 70/1 of 2021 Bashir Ahmad Vs Khurshid Ahmad etc

Parties present.

This order shall dispose of the following two applications:

- i. Application dated 07.07.2021 moved by petitioner/plaintiff seeking temporary injunction.
- ii. Application dated 09.09.2021 moved by petitioner/ defendant under Order 7 Rule 10 CPC for return of plaint.

Replies of both the applications are on file. Arguments have been heard. Record gone through.

Necessary facts for the disposal of two applications are that plaintiff Bashir Ahmad had brought the instant suit against the defendants Khurshid Ahmad/President Para Medical Association District Swat and District Health Officer Swat for declaration to the effect that he had been appointed as Chief PHC Technician/Store Keeper in Health Department. That the defendant No. 2 have no right/authority whatsoever either to deny this fact or remove/dismiss him from the post or transfer him to another post due to political influence and mutual connivance with defendant No. 1. That such act of defendant No. 2, if done or pursuing to do, is ineffective and inoperative upon his right and any proceeding in this regard, if any, in shape of any letter etc has been done, the same is liable to be cancelled.

Now, coming towards 1st application wherein petitioner/ plaintiff sought injunctive relief by requesting that defendants be restrained from initiating any proceeding against him in shape of removal/dismissal from the post, transfer, issuing order etc.

The stance of petitioner/plaintiff is that a strong prima facie case exists in his favor, balance of convenience also leans towards him and he would suffer irreparable loss in case if temporary injunction is not granted to him.

The respondent/defendants in their respective replies strongly opposed the stance of petitioner & alleged that application is barred by

1|Page

IN THE COURT OF SADIA HAROON Civil Judge-V/Illaqa Qazi, Swat

Suit No. 70/1 of 2021 Bashir Ahmad Vs Khurshid Ahmad etc

law and against the mandatory provision of Section 56-D of Specific Relief Act, 1877.

Record gone through, admittedly the plaintiff vide order No. 3382484 dated 27-05-2021 is posted chief PHC Technician (MP) in BPS-16 in Health Department.

Now, the moot question before this court is that whether the defendant No. 2/DHO, Swat has any lawful authority either to remove/transfer/adjust the petitioner/plaintiff allegedly with the convenience of defendant No. 1 (who is the President Para Medical Staff)?

Counsel for the petitioner/plaintiff presented the attested copy of \leq a letter No. 8554/DHO dated 23.09.2016 addressed by the Office of DHO, Peshawar to the Director General Health Services, KPK, Peshawar wherein he sought direction to administrate his status. The operative part is as follow: -

"Now it is worth mentioning that before the upgradation of staff, the DHOs/EDOs were the appointing authorities from BPS-01 to 10 and they also enjoying the powers of retirement/posting transfer and other relative matters of staff under his jurisdiction, but now the case is vice versa.

It is therefore humbly requested to please necessary direction may please issued on the subject noted above to dispose of the pension and other financial cases timely and avoid public complaints"

The Directorate General Health Services KPK, Peshawar in its letter No. 4647-714/Personnel directed/clarified that the District Health officers as well as Medical Superintendent of the District Head Quarter Hospitals enjoy the Administrative powers independently for the posts of BPS 1 to BPS 10.

Admittedly from the notification ibid, it is obvious that the DHO is authorized for the appointment/posting/transfer of staff from BPS-1 to BPS-10, whereas, the present petitioner/plaintiff is working as a Chief 2 | P a g e



IN THE COURT OF SADIA HAROON Civil Judge-V/Illaqa Qazi, Swat

-74-

Suit No. 70/1 of 2021 Bashir Ahmad Vs Khurshid Ahmad etc

PHC Technician (MP) in BPS-16. In this respect the defendant No. 1 was confronted with office order dated 02-07-2021 but no plausible answer was received of his issuing of the letter ibid (which is transfer order and allegedly Coram non-judice).

So far as the second application is concerned, it is the plea of petitioner/defendant No. 2 that in the present matter the jurisdiction of Civil Court is barred under Article 212 of the Constitution of Pakistan and Section 23-B of the Khyber Pakhtunkhwa Civil Servants Act 1973. The plea of the defendant No. 2 is quite genuine in the light of various judgments of apex Courts and reliance can be placed on latest judgment 2021 SCMR 1168.

So, in the light of settled law under Article 212 (2) of the Constitution which bars the jurisdiction of all the Courts except Service Tribunal to proceed the matter relating to the terms and conditions of service and Section 23-B of Service Tribunal Act which also bars the jurisdiction of civil Courts. Therefore, without dilating into the matter the case file is returned to the plaintiff with direction to present it before the proper forum within one month. Meanwhile in the said one month the defendants be restrained from any illegal acts/omission in violation of any lawful right of the plaintiff/petitioner (except with due course of law) till the presentation of instant suit before the proper forum *j*. Both the applications are decided accordingly. Cost shall follow the event.

Moharrir of the Court is directed to do the needful.

10-91 Non-of Presentation of Application. 18-1. X 1. 5-21 Date on which Copy Prepared 18 1 X 102 1 Usgent Fee.... Name of Copyist Ab duluadood 0-----Signature. Ce ong Fee Fee Une unsalivery 18-1 K 1 D 3 | Page

(SADIA HAROON) Civil Judge-V / Illaga Qazi, Swat (سعديد بارون) سولن جر/ ملاقة قاضي بجم

ATTESTED TO BE TRUE COPY

EXAMINER District & Session Judge Zilla Qazi. Swat. б

"M"-75-بجضور جناب ذائر يكثر جزل صاحب ميلتصير وسزصوبه خيبر يختوانخواه

بمقام يشاور

بشيراحد ولدمحد فياض ساكن محلّه آ فسرآ بإد، كالج كالوني ،سيد دشريف بخصيل بابوز أيضلع سوات سايلانك بنام د سرکٹ ہیلتھ آفیسر سوات بمقام گلکد ہ ضلع سوات --- ريسيا نڭرنىك

محکر آئیل بدیں مراد کہ من اپلانٹ محکمہ ہیلتھ میں بحثیت Cheif PHC تعینات م اور اپنی دو ہو بنی ایما نداری اور آ فسر ان بالا کے منشاء کے مطابق سرانجام دیں رہا ہے۔ در سپ نڈ نٹ نے بلاجواز اور بلا اختیار ، صرف اور صرف سیاسی اثر رسوخ کے بناء پر اپیلانٹ کو اپنے پوسٹ سے مور خہ 2021-07-02 ہٹایا / تبادلہ کیا ہے جو کہ بلاجواز واختیار ، سیاسی اثر رسوخ کے بناء پر ہوتے ہوئے حقوق اپیلانٹ پر کا لعدم وغیر متوثر ہوتے ہوئے قابل منسوخی ہے۔

جناب عالى! الپل الپلانت حسب ذيل ہے۔

يول

یہ کہ اپلانٹ یا کتان کے پرامن شہری ہے اور صوبہ خیبر پختواہ ضلع سوات کا رہائتی باشندہ _1



(جاری ہے)

.76-

بدكها پيلانت محكم صحت ميں بحثيث PHC Technician BPS-16 Cheif Store Keeper / تعینات ہے۔ اپلانٹ نے ابتداء ہی سے اپنی ڈیوٹی انتہا کی ایمانداری اورآ فسران بالأ کے منشاء کے مطابق سرانجام دی ہے۔ (کوا کف اپیلا نٹ لف سے) یہ کہا پیلانٹ ایک کوالیفائیڈ پیرامیڈیکس ہے جس نے MPH کی ڈگری حاصل کررکھی ہے اورمتعلقہ شعبہ/سٹور میں وسیع تجربہر کھنے کے ساتھ ساتھ مختلف سپیش ٹریننگ بھی حاصل کی ہے۔ اس نسبت نقولات لف ہیں۔ یہ کہ ریسیا نڈنٹ نے بلا اختیار، بدنیتی اور سازشی طور پر اپیلانٹ کونقصان رسانی کے خاطرا پیلانٹ کو مٰدکورہ عہدے/سٹور کیپر سے ہٹانے کے بابت سیاسی اثر رسوخ اور بدنیتی کے بناء برمورخہ 2021-07-20 کوتھم صا در کیا ہے جس کا ہر گز ریسیا نڈنٹ کو اختیار حاصل نہ ہےاور مذکورہ تھم بدنیتی اور سیاسی انتقام کے بناء پر ہوتے ہوئے قابل منسوخی ہے۔ یہ کہ جملہ کاروائی اپیلانٹ کے حقوق پر کالعدم اور غیر منوثر ہوتے ہوئے قابل _۵ منسوخی ہے۔ یہ کہا پیلانٹ صوبائی پیرامیڈیکل ایسوسی ایشن خیبر پختوانخواہ کے ملاکنڈ ڈویژن کا صوبائی نائب صدر ہے اورسمی خورشیداحد سوات پیرامیڈیکل ایسوسی ایشن کا صدر ہے۔ چونکہ من اپیلانٹ اور مسمی خورشید احمد کا ایسوسی ایشن کے ضلعی انتخابات میں مقابلیہ ہوا تھا جو کہ چند ودٹوں کی ثبقت سے خورشید احمہ مذکورہ جیتاتھا اس وجہ سے خور شید احمد مذکور ، انتقاماً مختلف زرائع مسے من اپیلانٹ کوئنگ ویریشان کرکے سیاس

انتقام لیتا ہے۔ مسمی خورشید احمد نے ایک درخواست / کمپلین برائے انکوائری

<لاجساری ہے¢



-77-برخلاف اپیلانٹ ریسیا نڈنٹ کو دیا تھا جس میں انکوائر ی ہوکر جملہ حقائق کوخفیہ رکھے ہیں اس کومنظرعام پرلایا جائے تا کہا پیلانٹ اوراپ صاحبان کوحقیقت معلوم ہوں کہ اصل حقائق کیا ہیں۔۔؟ اسی وجہ سے خورشید احمد نے ساز باز کرکے اپیلانٹ کوایک طرف ذہنی کوفت پہنچایا ہے جبکہ دوسری طرف اپیلانٹ کواپنے پوسٹ سٹور کیپر سے ہٹانے/ تبادلہ کرنے کی سازش کی ہے جس بابت اپیلانٹ کوشنوائی کا موقع نہیں دیا گیا ہے۔(نقولات لف ہیں)

- ۔۔ ہیکہ ریسپانڈنٹ کے پاس اختیار نہیں ہے کہ وہ ایلانٹ کو اپنے پوسٹ سے کسی دوسری جگہ تبادلہ کریں یا اُس کو اپنی ڈیوٹی سے روکے جو کہ ایک غیر قانونی فعل ہے۔ کیونکہ ایلانٹBPS-16 اور ریسپانڈنٹ کے ساتھ صرفBPS-12 تک تبادلہ کا اختیار حاصل ہے۔
- ۸۔ ہیر کہ ریسپانڈنٹ نے بغیر کسی شوکازنوٹ / Explination / وارننگ یا انکوائری اور نہ ہی اپیلانٹ کو شنوائی کا موقع دیا ہے اور مزید کاروائی کر کے بلاا تحقیار اور خود ساختہ طور پر اپیلانٹ کو اپنے پوسٹ سے ہٹایا ہے (جس سے کہ انکار ہے) اور اب دیگر کسی شخص کو اپیلانٹ کی جگہ تعینات کرنے کے درپے ہیں۔ جس کے وہ ہر گر مجازنہ ہیں۔
- ۹۔ پیکہ ریسپانڈنٹ کی جملہ کاروائی متذکرہ بالا اپیلانٹ کے حقوق پر کالعدم وغیر متوثر ہوتے ہوئے قابل منسوخی ہے۔
- •ا۔ بیرکہ مذکورہ سمی خورشید احمد اور ریسپانڈنٹ کی کاروائی ذاتی عناد اور سیاسی اثر رسوخ اور ایک خاص گروپ کوفائدہ پہنچانے اورخوش کرنے کیلئے کی گئی ہے۔ جو کہ سراسر ذیا دتی ہے او

🗧 جباری هے

-78-رمستقبل قريب ميں محكمة صحت اور باالخصوص DHO آفس سوات كى ساكھ كى بدنا مى كا سبب بن سکتی ہے۔ ید که اپیل بذااب صاحبان کودائر کی جارہی ہے جس کا اختیار ساعت اپ صاحبان کو حاصل ہے۔ _|| فرمائی جاوے ۔ دیگر دادرس جو قرین انصاف ہوبھی مرحمت فرمائی جائے۔

عريض

AI ADIED

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR.

Personnel

4647-714

All District Health Officers in Khyber Pakhtunkhwa. Ali Medical Superintendents DHQ Hospitals in Khyber Pakhtunkhwa.

<u>SUPERINTENDENTS.</u>

<u>ADMINSTRATIVE STATUS OF DISTRICT HEALTH OFFICERS/ MEDICAL</u>

Prior to promulgation of local Govt ordinance 2001 the District Officers viz District Health Officer and MS DHQ Hospitals of the Health Department used to enjoy the Administrative Financial (powers) independently (in pursuance) of Govt of Khyber). Pakitunkhwa S&GAD regulation wing Peshawar Notification No. SOR-I(S&GAD). I-201/98 dated.07.09.1998.

After promulgation of local Govt ordinance 2001 the posts of District Health Officers were converted into Executive District Officer (Health) and by virtue of the endinance ibid the Executive District Officers (Health) were declared as Administrative Field for the District Health Department

However, after withdrawal of local Govt ordinance, the powers exercised by the District Health Officers and Medical Superintendents were restored as was notified vide Govt Ninber Pakhtunkhwa S&GAD regulation wing Peshawar No. SOR-I(S&GAD) 1-201.98 dated.07.09.1998.

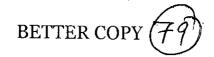
In view of the foregoing, it is clarified that the District Health Officers as well as Medica: Superintendents of the District Head Quarter Hospilars enjoy the Administrative powers independently.

DIRECTOR GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Date 20/6/

P.S to Minister for Health Khyber Pakhtunkhwa Peshawar.
 P.S to Secretary Health Govt: of Khyber Pakhtunkhwa Peshawar.
 Deputy Director (Personnel) DGHS Office Peshawar.
 Deputy Director (Admn) DGHS Office Peshawar.
 Assistant Director P-I DGHS Office Peshawar.
 Assistant Director P-II DGHS Office Peshawar.
 Assistant Director P-II DGHS Office Peshawar.
 Assistant Director P-III DGHS Office Peshawar.
 Assistant Director P-III DGHS Office Peshawar.
 DHIS Cell DGHS Office Peshawar.
 P.A to DGHS Khyber Pakhtunkhwa Peshawar.
 P.A to Director (Admn) Khyber Pakhtunkhwa Peshawar.

12. Master File



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR.

4647-714 Personnel

Date:20.04.15

То

All District Health Officers in Khyber Pakhtunkhwa All Medical Superintendents DIIQ Hospitals in Khyber Pakhtunkhwa

Subject: <u>ADMINISTRATIVE STATUS OF DISTRICT HEALTH</u> <u>OFFICERS/ MEDICAL SUPERINTENDENTS</u>

Prior to promulgation of local Govt ordinance 2001 the District Officers viz District Health Officer and MS DHQ Hospitals of the Health Department used to enjoy the Administrative Financial powers independently in pursuance of Govt of Khyber Pakhtunkhwa S&GAD regulation wing Peshawar Notification No. SOR-I(S&GAD). 1-201/98 dated 07.09.1998

After promulgation of local Govt ordinance 2001 the posts of District Health Officers were converted to Executive District Officer (Health) and by virtue of the ordinance ibid the Executive District officer (Health) were declared as Administrative Head for the District Heath Department

However, after withdrawal of local Govt ordinance, the powers exercised by the District Health Officers and Medical Superintendents were restored as was notified vide Govt Khyber Pakhtunkhwa S&GAD regulation wing Peshawar No. SOR-I(S&GAD) 1-201 98 dated 07.09.1998

In view of the foregoing, it is clarified that the District Health Officers as well as Medical. Superintendents of the District Head Quarter Hospital enjoy the Administrative powers independently.

DIRECTOR GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR

1. PS to Minister for Health Khyber Pakhtunkhwa Pesitawar.

2. PS to Secretary Health Govt: of Khyber Pakhtunkhwa Peshawar.

3. Deputy Director (Personnel) DGHS Office Peshawar

4 Deputy Director (Admn) DGHS Office Peshawar

5. Assistant Director P-I DGHS Office Peshawar.

6 Assistant Director P-II DGHS Office Peshawar

7. Assistant Director P-III DGHS Office Peshawar

8. Assistant Director (Nursing) DGHS Office Peshawar.

9. DHIS Cell DGHS Office Peshawar

10. PA to DGHS Khyber Pakhtunkhwa Peshawar

11. PA to Director (Admn) Khyber Pakluunkinwa Peshawar.

12. Master File

Y

dated Pesh: 23/ 2 /2016

OFFICE OF THE DISTRICT HEALTH OFFICER PESILAWAR Phone No. 091-9212914

/DHO

Director General Health Services Khyber Pakhtunkhwa Peshawar.

Subject: Sir.

To:-

ADMINISTRATIVE STATUS.

I have the honour to submit that before 2013, the District Health Officers in KPK was converted into EDO(Health) and by virtue of the ordinance ibid, the EDO(Health) were declared as administrative head of District Health Department. He was also declared as appointing authority from BPS-01 to 10 in the said ordinance. After 2013, the EDO (health) was again converted to DHO and declared as category-1 Officer for administrative powers vide letter No.4647-714/Personnel dated 20/4/2015 and also category-1 officer for financial powers vide FD department notification No.SO(FR)FD/9-1/2014-15 dated 7/6/2016. Before and after 2013, all the posts of Paramedics etc: were in BPS-09 while those posts were upgraded to BPS-12 and above vide notification No. FD/SO (FR) 7-20/2015 dated 30/6/2015.

Now it is worth mentioning that before the upgradation of staff, the DHOs/EDOs were the appointing authorities from BPS-01 to 10 and they also enjoying the powers of retirement/posting transfer and other relative matters of staff under his jurisdiction, but now the case is vice versa.

It is therefore humbly requested to please necessary direction may please be issued on the subject noted above to dispose off the pension and other financial cases timely and avoid public complaints.

The matter is most urgent and wants your personnel attention.

istrici Health Officer 5.16

1912

/DHO/

Copy is forwarded to the:-

- 1. Accountant General KPK Peshawar.
- 2. Deputy Commissioner Peshawar. 3. Section Officer (FR), Finance Department KPK Peshawar
- 4. PS to Secretary Health KPK Peshawar.
- 5. Accounts Section

car information

No.

Dist. Govt. KP-Provincial District Accounts Office SWAT Monthly Salary Statement (June-2021)

Personal Information of Mr BASHIR AHMAD d/w/s of M.FAYAZ

Personnel Number: 00072342 Date of Birth: 08.08.1966

CNIC: 1560203431221 Entry into Govt. Service: 10.03.1988 Length of Service: 33 Years 03 Months 022 Days

NTN:

Employment Category: Active Temporary.

80004775-DISTRICT GOVERNMENT KHYBE Designation: CHIEF PHC TECHNICIAN (MUL DDO Code: SW6199-District Health Officer Swat Payroll Section: 002 GPF Section: 001 Cash Center: **GPF Balance:** 717,222.00 GPF A/C No: JM SW001826 Interest Applied: Yes Vendor Number: -BPS: 16 Pay Stage: 21 Pay Scale Type: Civil Pay scale: BPS For - 2017 Pay and Allowances:

Wage type		Amount	Amount Wage type		Amount	
0001	Basic Pay	50,830.00	1000	House Rent Allowance	2,727.00	
1210	Convey Allowance 2005	5,000.00	1912	Compen Allow 20% (16-N1)	1,500.00	
1947	Medical Allow 15% (16-22)	2,053.00	1985	Health Professional Allow	. 10,000.00	
2148	15% Adhoc Relief All-2013 ·	1,025.00	2199	Adhoc Relief Allow @10%	713.00	
2211	Adhoc Relief All 2016 10%	3,624.00	2224	Adhoc Relief All 2017 10%	5,083.00	
2247	Adhoc Relief All 2018 10%	5,083.00	2264	Adhoc Relief All 2019 10%	5,083.00	
5002	Adjustment House Rent	66.00	5011	Adj Conveyance Allowance	66.00	
5322	Adj Adhoc Relief All 2018	37.00	5336	Adj Adhoc Relief All 2019	37.00	
5801	Adj Basic Pay	373.00	5886	Adj Comp Allowance 20%	64.00	
599Ô	Adj Adhoc Relief All 2017	37.00			0.00	

Deductions - General

Wage type	Amount		Wage type	Amount
3016 GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3534 R. Ben & Death Comp Fresh	-650.00	3609	Income Tax	-2,169.00

Deductions - Loans and Advances

Loan	 Description	· Principal amount	Deduction	Balance	

Deductions - Income Tax

Recovered till JUN-2021: Exempted: 0.55-Recoverable: 21,179.45 21,180.00 0.00 Payable:

Net Pay: (Rs.): Deductions: (Rs.): -7,659.00 85,742.00 Gross Pay (Rs.): 93.401.00

Payee Name: BASHIR AHMAD

Account Number: 4044007

Bank Details: THE BANK OF KHYBER, 080012 MINGORA BRANCH SAIDU ROAD MINGORA BRANCH SAIDU ROA, Swat

Leaves:	Opening Balance:	Availed:	•	Earned:	Balance:	

Permanent Address: SWAT								
City: SWAT		Domicile: NW - Khyber Pakhtunkhwa	,	.:		Housing Status: N	lo Official	
Temp. Address:								•
City:	÷	Email: bashir.ahmad8@gmail.com			1		•	
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System generated document in accordance with APPM 4.6.12.9(66931/25.06.2021/v3.0) All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/30.06.2021/00:44:15)

2	_64377 <u>3</u> 09;	
•	80268773 ACCTEVAL	D 07 FULED
1704 CHU SHAHWALI KHAN	80268438 (IBI)	16 OPEN
5557 SHAH HUSSAIN	80268142	2-15 FUED
2342 BASHIR AHHAD	80268375/ CUTE BUANNES	16 FILLED
3549 USHAN ALL	80268375 CHIEF PHC TECHNICIAN (HULTI PURPOS 80268437 CHOWNDAR	E) 16 FILED
7752 FAZAL RAHMAH	80258448	03 FALLED
0501 NUHAL KHAN .	80470341	03 FALED
	80268444 (TUTT'AT	03 FILLED
6786 HAIDAR ALL	BOZ68444 QINICAL TECHNICIAN (PHARMACY) 80734960 CLINICAL TECHNOLOGIST (MCH)	JZ OPEL
	80268445; COMPUTER OPERATOR	17 FILLED 1
DOIG AHMAD ALL	BO268435 COORDINATOR	16 OPEN I
295 FAZAL ARIF	80382059	18 FILLED
3999 SYED RAHHAT ALL	80382061	18 FILED 1
1627 LIADATALI	80382063	18 FILED
5348 MAD SHAH		18 FILED
2171 ORCHUHAHHAD SALDA KHAN	80726267 DATA ENTRY OPERATOR 80577335 DEPUTY DISTRICT HEALTH OFFICER	16 ELED I
	80265443 DISTRICT HEALTH OFFICER	19 FILED
9686 BASHIA HUSSAIN	BOZOBAJA DRIVER	20 OPEN 1
9246 SHAUDAT ALL 5779 UHARA WAR	00268446	OG FILED T
19947 ALLAN PROVIDENCE	60268447	05 FILLED I
17018 / A HARD A MANTERSTROMMENT	80577310	06 ELED_
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and the second sec	80577514 80577318	
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3784	Mohd Shahwali Khan	80268438	Assistant	16	Open	1
3537	Shah Hussain	80268442		15	Filled	1
2342	Bashir Ahmad	80268375	Chief PHC Technical (Multi Purpose)	15	Filled	1
<u>3949</u>	Usman ALI	80268437	Chowkidar	16	Filled	$ \frac{1}{1}$
7752	Fazal Rahman	80258448		16	Filled	1
0601	Nihal Khan	80470348		03	Filled	1
		80268444	Clinical Technician (Pharmacy)	03	Open	1
6786	Haider Ali	80734960	Clinical Technologist (MCH)	036	Filled	1
		80268445	Computer Operator	12	Open	1
0016	Ahmad Ali	80268435	Coordinator	17	Filled	
1295	Fazal Arif	80382059		16	Filled	1
9999	Syed rahmat Ali	80382061		18	Filled	1
1627	Liaqat Ail	80382063		18	Filled	
<u>6348</u>	Imad Shah	80726278	•	8	Filled	1
2171	Dr. Muhammad Salim Khan	80577335	Data Entry Operator	18	Filled	1
		80268443	Deputy District health Officer	16	Filled	1
9686	Bashir Hussain	80268433	District health Officer	19	Open	1
9246	Shawat Ali	80268446	Driver	20	Filled	1
5779	Umara Khan	80268447		05	Filled	1
8847	Amna Bibi	80577310		05	Filled	
97810	Akbar Ali Khan	80577311		06	Filled	1
87196	Nasarullah Khan	80577312		06	Filled	1
37207	Bakht Nawab	80577313		06	Filled	1
37211	Syed Muhammad Ali Shah	80577314		06	Filled	1
37209	Fazal Ilahi	80577315	-			
			-	06	Filled	
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بعدالت علي وسروس (رمول لحور <u>ره 2 منجا</u> م وزخه in Dyth Ch لترمر المر مقدمه دعوكى <u>, 7</u> باعث تحريرا نكه مقدمه مندرج عنوان بالامين ابن طرف سے داسط بیروی دجواب دنی دکل کاردانی متعلقہ متن مقام مسلح دیسے کمیلیے مناصل کے دھی ماری کے معام الدی کار دانی متعلقہ مقردكر سے اقراركيا جاتا ہے، کہ صاحب موصوف كومقدمہ كى كل كاروا كى كاكامل اختيار ، وگا۔ نيز م دکیل صاحب کوراضی نامد کرنے دتقتر د ثالت ہ فیصلہ بر حلف دسیتے جواب دہی اورا قبال دعوی اور ۲ به سورت د گری کرنے اجراءا در صولی چیک در و پیدار عرضی دعوی اور درخواست مرتسم کی تقدید یق زراي پردستخط كراف كا نقايار وكار فيزصورت عدم بيروى با دكرى يكظرفه باايل كى برايدكى اورمنسوخى نیز دائر کرنے اپیل نکرانی دنگرثانی د پیروی کرنے کا اختیار ہوگا۔ از یصورت ضرورت مقدمہ مذکور ا المحال باجزوى كاروائى ، واسط اوروكيل بالمخارقانونى كوابية ممراه باابيع بجائر مكافعتيار موكا _اورما حب مقرد شد، كومجى وأى جمل تدكوره باا فقتيا دانت حاصل مول مح اور اس كاساخت برداخة منظور تبذل موكارددران مقدمه يس جوخر جدد مرجان التواسط مقدم سي سب وموكار كونى تاريخ يبتى مقام دوره يرجو بإحدب بابر موتدوكيل ماحب بإبند بول مم لم يروى after لمكوركري - لمداوكالت نام كمحديا كمستدر ب-·2021 _____ ·l _2° الرتوم --___ گر____واه النب___ لے ور مے لئے منظور ہے۔ يمقام Affestel & Accepto whet here