

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No.78/2019

Date of Institution ... 17.01.2019
Date of Decision ... 13.12.2022

Ghulam Hussain S/O Ghulam Sarwar R/O Presently Dalazak Road, Street No.
4, Mohalla Gul Abad No.1, Peshawar:

... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Health Department, Peshawar.
2. Lady Reading Hospital Peshawar through its Director Hospital.
3. Director General Health Services Khyber Pakhtunkhwa, Peshawar.

... (Respondents)

Ibrahim Khan Afridi

Advocate

... For appellant

Nascer Ud Din Shah

Assistant Advocate General

... For respondents

Mrs. Rozina Rehman

... Member (J)

Miss Fareeha Paul

... Member (E)

JUDGMENT

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

“That on acceptance of this appeal the impugned order dated 19.02.2018 may please be set aside/turned down and the deducted salary of the appellant may kindly be reimbursed back to the appellant.”



2. Brief facts of the case are that appellant was Provincial Civil Servant who was performing his duties in Leady Reading Hospital Peshawar as a cook. His salary was withheld without any reason and plausible explanation which was later on released vide order dated 19.02.2018. Respondents deducted salary of 71 days which is evident from his pay roll. He then submitted an application/departmental appeal regarding deduction of his salary but the same was not responded to; hence the present service appeal.

3. We have heard Ibrahim Khan Afridi, Advocate learned counsel for the appellant and Naseer Ud Din Shah learned Assistant Advocate General for respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Ibrahim Khan Afridi, Advocate learned counsel for the appellant submitted that the impugned order is against law and facts as the appellant was not treated according to law rather treated in a discriminatory manner which was not warranted in the eyes of law. He submitted that the appellant was not treated at par with his colleagues as envisaged in article 4 of Constitution of Islamic Republic of Pakistan. That as per Article 25 of Constitution of Islamic Republic of Pakistan there shall be no discrimination but in the instant case whole process was done partially according to the will of the respondent No. 2. Learned counsel further contended that well settled principle of law "Audi alteram partem" was violated and that appellant was not given an opportunity before issuance of impugned order. He, therefore, requested for acceptance of the instant service appeal.

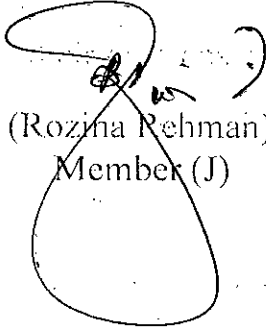
the appellant. Absence for 71 days was not proved through cogent evidence. The appellant was discriminated which is evident from the record that one Muhammad Waris, ward orderly was also charged for 43 days of absence and his salary was accordingly deducted. Reportedly he filed service appeal which was later on withdrawn because his salary for the said period was refunded vide office order dated 18.01.2019. No cogent reason was shown as to why was the appellant discriminated and his salary was not refunded.

7. For the above mentioned facts and circumstances, this appeal is allowed as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

13.12.2022

(Barécha Paul)
Member (E)


(Rozina Rehman)
Member (J)

ORDER
13.12.2022

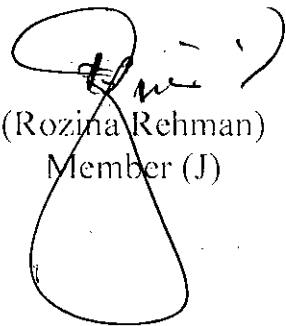
Appellant present through counsel.

Naseer Ud Din Shah learned Assistant Advocate General
for respondents present. Arguments heard. Record perused.

Vide our detailed judgment of today placed on file,
instant service appeal is accepted as prayed for. Parties are left
to bear their own costs. File be consigned to the record room.

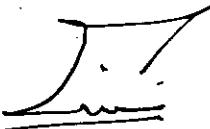
ANNOUNCED
13.12.2022

(Farecha Paul)
Member (I)


(Rozina Rehman)
Member (J)

27th July 2022 Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

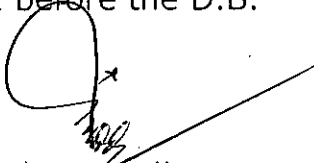
Learned counsel for the appellant seeks adjournment in order to properly assist the court on the next date. Adjourned. To come up for arguments on 23.09.2022 before the D.B.

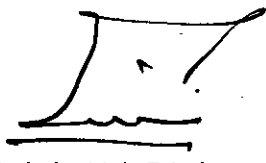

(Salah-Ud-Din)
Member (J)


(Kalim Arshad Khan)
Chairman

23.09.2022 Mr. Nadeem Khan, Advocate, junior of learned counsel for the appellant present. Syed Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to some domestic engagement. Adjourned. To come up for arguments on 13.12.2022 before the D.B.

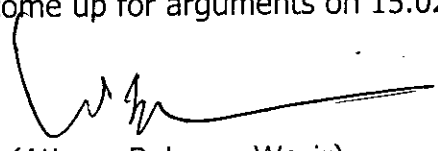

(Mian Muhammad)
Member (Executive)


(Salah-Ud-Din)
Member (Judicial)

03.01.2022

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Addl.AG for the respondents present.

Former requests for adjournment due to engagement of learned senior counsel for the appellant before the Honourable High Court today. Request accorded. Case to come up for arguments on 15.02.2022 before the D.B.


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


Chairman

15.02.2022

Due to retirement of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 13.05.2022 for the same as before.



Reader


13.05.2022

Junior to counsel for appellant present.

Muhammad Rasheed learned Deputy District Attorney alongwith for respondents present.

Former requested for adjournment due to non-availability of senior counsel. Request is acceded to and case is adjourned to 27.07.2022 with direction to make sure presence of senior counsel on the next date positively, before D.B.


(Fareeha Paul)
Member(E)


(Rozina Rehman)
Member (J)


11.03.2021

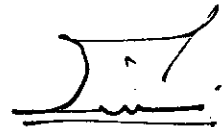
Due to non availability of Bench, the case is adjourned to 14.06.2021 for arguments before D.B


READER

14.06.2021

Appellant alongwith his counsel present. Mr. Javed Ullah, Assistant Advocate General for respondents No. 1 & 2 present. Mr. Hamza Bangash, Assistant Director (Legal) for respondent No. 3 present and requested for adjournment on the ground that Legal Advisor for respondent No. 3 has proceeded to Karachi in connection with some domestic engagement. Adjourned. To come up for arguments before the D.B on 04.10.2021.

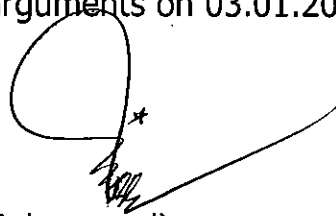

(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

04.10.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondent No.1 and Mr. Majid Masoom Khattak, Advocate Associated of counsel for respondents No. 2 and 3 are present.

Due to non-availability of learned counsel respondent No. 2 and 3, adjournment has been sought. Accorded. To come up for arguments on 03.01.2022 before the D.B.


(Mian Muhammad)
Member(E)


Chairman

15.04.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 13.07.2020 before D.B.


Reader

13.07.2020

Due to COVID-19, the case is adjourned to 12.10.2020 before D.B.


Reader

12.10.2020

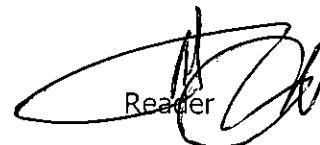
Due to incomplete Bench, the case is adjourned. To come up for the same on 18.12.2020 before D.B.


Reader

18.12.2020

Counsel for appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Due to COVID-19, case is adjourned to 11.03.2021 for the same as before.


Reader

13.12.2019

Appellant in person present. M/S Hazrat Shah, Superintendent on behalf of respondent No. 1 and Khial Mohammad, Legal Advisor on behalf of respondent No. 2 alongwith Mr. Kabirullah Khattak, Additional AG present. Representatives of respondents No. 1 & 2 requested for further time to file written reply/comments. None present on behalf of respondent No. 3 therefore, notice be issued to respondent No. 3 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned to 14.01.2020 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

14.01.2020

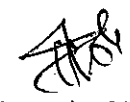
Appellant in person. Mr. Khial Muhammad, Legal Officer for respondents No. 1 & 3 present. Mr. Ibrahim Khan, Advocate submitted Wakalantma in his favour executed by respondent No. 2, which is placed on record.

Respondents seek further time. Last opportunity is granted. To come up for written reply/comments on 24.02.2020 before S.B.


Chairman

24.02.2020

Appellant alongwith counsel present. Mr. Kabirullah Khattak, Addl. AG alongwith Saleem Javed, Litigation Officer for respondent No. 3 and Barrister Ibrahim, Legal Advisor for respondent No. 2 present. Written reply on behalf of respondent No. 2 submitted which is placed on record. Representative of respondent No. 3 relies on the written reply of respondent No. 2. To come up for rejoinder and arguments on 15.04.2020 before the D.B.


(Hussain Shah)
Member

SA 78/19

19.08.2019

Counsel for the appellant present.

Learned counsel for the appellant states that security and process fee have not been deposited within due time due to unavoidable circumstances and submitted an application for extension of time to deposit the same.

The application is allowed and the appellant is required to make the requisite deposit within next three days. Thereafter notices be issued to the respondents for submission of written reply/comments on ~~14.10~~ 14.10.2019 before the S.B.

Appellant Deposited
Security & Process Fee

19/8/19

Chairman

14.10.2019

Counsel for the appellant and Khial Muhammad, Legal Advisor alongwith Jaffar Ali, Assistant for the respondents present.

Legal Advisor of the respondents requests for time to submit the requisite reply/comments. To come up for reply/comments on 14.11.2019 before S.B.

Chairman

14.11.2019

Counsel for the appellant and Addl. AG alongwith Saleem Javed Litigation Officer for the respondents No. 1 & 3 and junior to counsel for respondent No. 3 present.

Representatives of the respondents seek time. Adjourned to 13.12.2019 on which date the requisite reply/comments shall positively be submitted.

Chairman

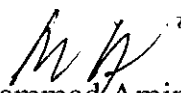
20.06.2019

Counsel for the appellant Ghulam Hussain present. Mr. Khalilullah Khalil, learned counsel for respondent No. 2 also present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving as Civil Servant in Health Department. It was further contended that the respondent-department has ordered for deduction of 71 days salary of the appellant vide order dated 19.02.2018 without any reason. It was further contended that the appellant filed departmental appeal on 20.02.2018 but the same was not responded hence, the present service appeal. It was further contended that the appellant has regularly performed his duty but the respondent-department has passed illegal order for deduction of 127 days salary of the appellant without any notice.

On the other hand, Mr. Khalilullah Khalil, learned counsel for respondent No. 2 opposed the contended of learned counsel for the appellant.

Perusal of the record reveals that deduction of ~~71~~¹²⁷ days salary of the appellant was ordered without any notice and reason therefore, the impugned order is illegal and liable to be set-aside.

The contentions raised by the learned counsel for the appellant need consideration. The 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 the respondents for written reply/comments for 19.08.2019 before S.B.


(Muhammad Amin Khan Kundi)
Member

06.05.2019

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Mir Wali, Assistant Legal Advisor for the respondents present. Representative of the department namely Mr. Mir Wali requested for adjournment. Adjourned. To come up for preliminary hearing on 21.05.2019 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

21.05.2019

Learned counsel for the appellant present. Mir Wali Advocate junior to counsel for respondent No.2 present and seeks adjournment. Adjourn. To come up for preliminary hearing on 20.06.2019 before S.B.


Member

18.02.2019

Learned counsel for the appellant present. Heard.

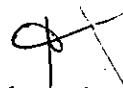
Through the present service appeal the appellant has made impugned the order dated 19.02.2018 of the Associate Hospital Director Lady Reading Hospital MTI Peshawar regarding deduction of 71 days salary of the appellant. The appellant has also addressed his departmental appeal/representation to the Associate Director Lady Reading Hospital MTI Peshawar. Plea of the appellant is that he is a civil servant.

In the interest of justice pre-admission notice be issued to the respondents. To come up for reply of the respondent department and preliminary hearing on 04.04.2019 before S.B.


Member

~~01~~04.2019



None for the appellant present. Addl: AG for respondents present. Due to general strike of the bar, the case is adjourned. Case to come up for further proceedings on 06.05.2019 before S.B.


(Ahmad Hassan)
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 78/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/1/2019	<p>The appeal of Mr. Ghulam Hussain presented today by Mr. Mufariq Shah 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 17/1/19</p>
2-	18-1-19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>18-2-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No: 78 /2019

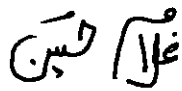
Ghulam Hussain

Verses

Government of KPK and others

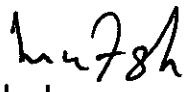
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5.	Copy of impugn order & Pay roll	"B"	7-12
6.	Copy of application/department appeal	"C"	13
7.	Copy of biometric attendance	"D"	14-19
8.	Wakalatnama.		20

Appellant 
(Ghulam Hussain)

Dated: 17-01-2019

Through


Mufariq Shah
Advocate High Court,
Peshawar.
Office No. 15, Hazrat Shah Plaza,
Shoba Bazar, Peshawar.
Mobile No: 0314-9175656
E-mail:
mufariq_shah@hotmail.com

①

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

Service Appeal No 78 /2019

Ghulam hussain S/O Ghulam Sarwar R/O Presently Dalazak road, street
no. 4, Mohalla Gul abad no. 1, Peshawar. Khyber Pakhtunkhwa
Service Tribunal

Dirry No. 74 (Appellant)

VERSUS

Dated 17-1-2019

1. Government of Khyber PukhtunKhwa through Secretary Health Department, Peshawar.
2. Leading Reading Hospital Peshawar through its Director Hospital.
3. Director General Health Services Khyber PukhtunKhwa, Peshawar.

(Respondents)

Appeal under section 4 of the Khyber Pakhtunkhwa services Tribunal Act 1974 against the impugn Order, Ref no. 0970/AHD/PA/LRH, dated 19/02/2018. Whereby the salary of 71 days of the appellant is deducted without any plausible explanation and till yet the departmental appeal has not been decided.

Filed to-day

Registrar

17/1/19 **Prayer:**

On acceptance of the instant service appeal in hand the impugn order, Ref no 0970/AHD/PA/LRH, dated 19-02-2018 may please be set aside / turn down and the deducted salary of the appellant may kindly be reimbursed back to the appellant.

Respectfully Sheweth;

The facts giving rise to the instant appeal:

ON FACTS:

1. That the appellant is the provincial civil servant performing his duties in LRH hospital, Peshawar. Appellant is a cook. (Copy of the service card & CNIC of the appellant is attached as Annexure 'A')

②

2. That the respondent no. 2 stopped/withheld the salary of the appellant without any plausible explanation and release the same by issuing the release order, ref no. 0970/AHD/PA/LRH on dated 19-02-2018, deducted 71 days out of appellant's salary, and consequently the same start deducting monthly from his pay roll. (Copy of impugn order & Pay roll is attached as annexure 'B')
3. That consequently on dated 21-02-2018 the appellant duly and within time submitted his applications/departmental appeal for initiating departmental inquiry regarding the deduction of their salary. (Copy of applications/department appeals attached as annexure 'C')
4. That during all this time, for which the salary of the appellant is deducted, he was in full attendance and no reason for the deduction of pay has ever been given to the appellant. (Copy of biometric attendance attached as annexure 'D')
5. That feeling aggrieved by the impugn order as mentioned in the heading of this appeal, against which departmental appeal was filed by the appellant but till date no plausible explanation or order has been made, hence the instant appeal on the following grounds amongst others:

GROUND:

- A. The illegal and malafide act of the respondent no. 2, loudly speaks that he treats the appellant as according to his ill will, in a very discriminating manner, which is not warranted in the eyes of law, also the constitution doesn't permit such discrimination.
- A. That the appellant has not been treated at par with the rest of the candidates as envisaged in article 4 of the constitution, hence the respondent no. 2 knowingly and willfully abrogated the constitution.
- B. That as per Article 25 of the constitution of 1973 of Islamic republic of Pakistan, there shall not be any discrimination in between the citizen of Pakistan but in here the whole process was done partially and according to the will of the respondent no. 2.
- C. That no charge sheet and statement of allegation and final show cause notice was issued to the appellant.

3

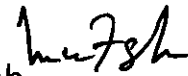
- D. That respondent no. 2 has not treated the appellant in accordance with Law, rules, and policy on subject and acted in violation of the article 4 of the constitution of 1973 of the Islamic republic of Pakistan.
- E. That a well settled principle of law "Audialtram Partem" has been violated, this principle of law was always deemed to have embodied in every statute even though there was no express or specific provision in this regard. An adverse order passed against a person without affording him an opportunity of personal hearing was to be treated as void order reliance is placed on 2006 PLC (CS) 1140. As no proper hearing has been afforded to the appellant before issuing of the impugned order therefore on this score the said order is to be considered null and void.
- F. That the appellant would like to seek the permission of the honorable Tribunal to add more grounds at the time of arguments.

While considering the above submission the appeal in hand may please be accepted /allowed and the deducted salary of the appellant may kindly be reimbursed.

Appellant 
(Ghulam Hussain)

Dated: 17-01-2019

Through


Mufariq Shah
Advocate High Court,
Peshawar.
Office No. 15, Hazrat Shah Plaza,
Shoba Bazar, Peshawar.
Mobile No: 0314-9175656
E-mail: mufariq_shah@hotmail.com

4

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

Service Appeal No _____/2019

Ghulam Hussain

(Appellant)

VERSUS

Government of KPK and Others

(Respondents)

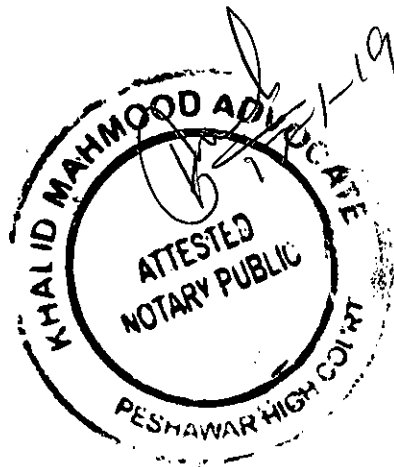
Affidavit

I, Ghulam hussain S/O Ghulam Sarwar R/O Presently Dalazak road, street no. 4, Mohalla Gul abad no. 1, Peshawar, do hereby solemnly affirm and declare on oath, that the contents of this service appeal is correct to the best of my knowledge and belief and nothing has been concealed from this honorable Service Tribunal.

Deponent no: _____

CNIC no: 17301-1538253-5

Dated; 17-01-2019





OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

LADY READING HOSPITAL, MEDICAL TEACHING INSTITUTION, PESHAWAR
Phone # +92-91-9211433 Ext: 185 Facsimile: 0092-919211401 www.lrh.gov.pk

Ref No 0970/AHD/PA/LRH

Dated: 19/02/2018

To,

The Hospital Director
Lady Reading Hospital, MTI
Peshawar

Subject: **RELEASE OF SALARY OF CLASS-IV**

It is for your information that all the requirements are fulfilled by the Class-IV relieved staff and their salaries may please be released as mentioned below.

S. No.	NAME	FATHER NAME	DESIGNATION	REMARKS
1.	Mr. Sartaj	Muhammad Khan	Lift Operator	Release Full
2.	Mr. Shahid Masih	Waris Masih	Sweeper	Release Full
3.	Mr. Ishaq Buta	Buta Masih	Sweeper	Release Full
4.	Mr. Munawar Lal	Lal Din	Sweeper	Release Full
5.	Mr. Tahir Khan	Syed Khan	Dhobi	Release Full
6.	Mr. Muhammad Waris	Abdul Wahab	Ward Orderly	43 Days salary to be Deducted
7.	Mr. Hayat Khan	Taza Khan	Behishti	Release Full
8.	Mr. Fazle Moula	Fazal Rahim	Attendant	Release Full
9.	Mr. Noor Rahim	Abdul Kabeer	Ward Orderly	Release Full
10.	Mr. Mahabat Khan	Hasham Khan	Ward Orderly	Release Full
11.	Mr. Asif Khan	Alamzeb	Naib Qasid	Release Full
12.	Mr. Ghulam Hussain	Ghulam Sarwar	Cook	71 Days salary to be Deducted

-----Sd-----

ASSOCIATE HOSPITAL DIRECTOR

Lady Reading Hospital, MTI Peshawar

Dated: 20/02/2018

No. 0971/AHD/PA/LRH

Copy forwarded to information and necessary action:-

1. Director Human Resource
2. Director Finance
3. Assistant Director Legal
4. Budget & Accounts Officer
5. PA to Associate Hospital Director
6. Dealing Assistant Class-IV

LRH, MTI, Peshawar

LRH, MTI, Peshawar

LRH, MTI, Peshawar

LRH, MTI, Peshawar

LRH, MTI, Peshawar

LRH, MTI, Peshawar

ASSOCIATE HOSPITAL DIRECTOR

Lady Reading Hospital, MTI Peshawar

Attested
mu7sh

[Handwritten Signature]

20/02/18

[Handwritten Signature]

20/02/18



Lady Reading Hospital

2,6

March, 2018

777-01-000081
GHULAM HUSSAIN
Cook

Birth 02 AUG 1978

BPS04 N.T.N

PAYMENTS

001 Substantive Pay	15180.00
131 Conveyance Allowance	1785.00
134 House Allowance	1458.00
154 Ad-hoc Rel. Allow.(2013)	356.00
163 Ad-hoc Rel. Allow.(2015)	243.00
164 Ad-hoc Allowance (2016)	1235.00
166 Ad-hoc Allowance (2017)	1518.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		46233	7706.00
335 CP Fund	1730115382535	30340	384.00
381 Benevolent Fund			300.00

TOTAL *** " 23,275

Balance

TOTAL *** 8,390.00

NET AMOUNT PAYABLE 14,885

QUALIFYING SERVICE
15 YRS 6MON

BANK MCB
BRANC 0258 LRH
ACCOUNT 0095802010039079

Handwritten notes in Urdu script.

Attested
Handwritten signature

Lady Reading Hospital

9

اپریل 2018

April, 2018

Birth 02 AUG 1978

777-01-000081
GHULAM HUSSAIN
Cook

BPS04 N.T.N

PAYMENTS

001 Substantive Pay	15180.00
131 Conveyance Allowance	1785.00
134 House Allowance	1458.00
154 Ad-hoc Rel. Allow.(2013)	356.00
163 Ad-hoc Rel. Allow.(2015)	243.00
164 Ad-hoc Allowance (2016)	1235.00
166 Ad-hoc Allowance (2017)	1518.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		TOTAL ***	23,275
335 CP Fund		Balance	
381 Benevolent Fund		38527	7706.00
	1730115382535	30724	384.00
			300.00

QUALIFYING SERVICE
15 YRS 7MON

TOTAL *** 8,290.00
NET AMOUNT PAYABLE 14,885

BANK MCB
BRANC 0858 LRH
ACCOUN 0095802010039079

مبلغ کل قابل پرداخت 14,885/-

Attested
mu7sk

10

س

Lady Reading Hospital

May, 2018

777-01-000081
GHULAM HUSSAIN
Cook

Birth 02 AUG 1978

BPS04 N.T.N

PAYMENTS

001 Substantive Pay		15180.00
131 Conveyance Allowance		1785.00
134 House Allowance		1458.00
154 Ad-hoc Rel. Allow.(2013)		356.00
163 Ad-hoc Rel. Allow.(2015)		243.00
164 Ad-hoc Allowance (2016)		1235.00
166 Ad-hoc Allowance (2017)		1518.00
175 Medical Allowance		1500.00

DEDUCTIONS / RECOVERIES

334 XLVI Misc./Rec.			TOTAL ***		23,275
335 CP Fund			Balance		
381 Benevolent Fund			30821	7706.00	
			1730115382535	31108	384.00
					300.00

QUALIFYING SERVICE
15 YRS 8MON

TOTAL *** 8,390.00
NET AMOUNT PAYABLE 14,885

BANK MCB
BRANC 0858 LRH
ACCOUNT 0095802010039079

مبلغ قابل پرداخت 14,885 روپے

Attested
Muhammad



Lady Reading Hospital

جون

June, 2018

Birth 02 AUG 1978

777-01-000081
GHULAM HUSSAIN
Cook

BPS04 N.T.N

PAYMENTS

001 Substantive Pay	15180.00
131 Conveyance Allowance	1785.00
134 House Allowance	1458.00
154 Ad-hoc Rel. Allow.(2013)	356.00
163 Ad-hoc Rel. Allow.(2015)	243.00
164 Ad-hoc Allowance (2016)	1235.00
166 Ad-hoc Allowance (2017)	1518.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		TOTAL ***	23,275
335 CP Fund	1730115382535	Balance	
381 Benevolent Fund		23115	7706.00
		31482	384.00
			300.00

QUALIFYING SERVICE
15 YRS 9MON

TOTAL *** 8,390.00
NET AMOUNT PAYABLE 14,885

BANK MCB
BRANC 0658 LRH
ACCOUN 0095802010039079

نت کیوں تعلیمی صورت میں ہے اور وہاں سے قرضہ کیوں نہیں لیا گیا؟
بہترین صورت میں جواب دینا۔

Attested
Muhammad

July, 2018

Birth 02 AUG 1978

777-01-000081
GHULAM HUSSAIN
Cook

BPS04 N.T.N

PAYMENTS

001 Substantive Pay	15180.00
131 Conveyance Allowance	1785.00
134 House Allowance	2187.00
154 Ad-hoc Rel. Allow.(2013)	356.00
163 Ad-hoc Rel. Allow.(2015)	243.00
164 Ad-hoc Allowance (2016)	1235.00
166 Ad-hoc Allowance (2017)	1518.00
167 Ad-hoc Allowance (2018)	1518.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

TOTAL *** 25,522

334 XLVI-Misc./Rec.

Balance 15409 7706.00

335 CP Fund

1790115382595 31876 384.00

381 Benevolent Fund

300.00

QUALIFYING SERVICE
15 YRS 10MON

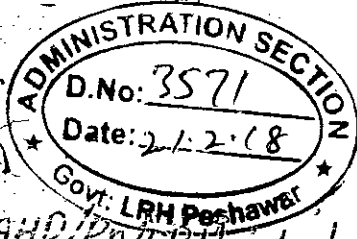
TOTAL *** 8,390.00

NET AMOUNT PAYABLE 17,132

BANK MCB
BRANC 0858 LRH
ACCOUNT 0095802010039079

مستحقہ تنخواہ کی رقم مندرجہ ذیل کے اکاؤنٹ میں جمع کروائی جائے گی۔
The amount of salary payable will be credited to the account mentioned below.

Attested
[Signature]



حکومت پنجاب AHD صاحبان کو دستاویز کارڈنگ جیتال آر آر میں

عنوان: درخواست برائے تنخواہ میں 71 دن ٹیوٹی والی کی جائے۔ ریفرنس نمبر 0970/AHD/PA/LRH

جیتال ما

- 1 یہ کہ یکم نومبر 2017 کو ڈاکٹر صاحبان نے کاماہ لیسے یعنی یکم مئی 2018 تک ڈیوٹی کرنے کی ہدایت کی ہے جوہ کامی لف ہے۔
- 2 یہ کہ سائل کو عورث 15/11/2018 کو مراد علیہ 1487-88/LRH/ETV وصول ہوا ہے جسے بعد سائل نے عورث 18/11/2018 کو سٹوکارڈ نوٹس کا جواب دیا۔ جس کا ڈاکری نمبر 1277 ہے۔
- 3 یہ کہ اسی دوران سائل کی لیٹل ایڈوائزر کے دفتر میں ڈیوٹی کرنے کا کیا تھا جوہ بندہ نے حاضری رپورٹ کی ہے جوہ کامی لف ہے۔
- 4 یہ کہ سائل کو عورث 22/2/2018 کو مراد علیہ 0977-0988 AHD/PA-LRH وصول ہوا ہے جسے بعد سائل نے آرڈر کے مطابق پلاسٹک جری وارڈ میں اپنی حاضری اریول رپورٹ دیکھنے کی جسی کامی لف ہے۔
- 5 یہ کہ اسی دوران سائل کو عورث 20/2/18 کو مراد علیہ 0970/AHD/PA-LRH وصول ہوا جس میں سائل کی تنخواہ سے 71 دن کی ٹیوٹی کی گئی ہے۔ کامی لف ہے۔

لہذا آج صاحبان کی خدمت میں درخواست ملے ہوئے کہ سائل کو لیٹل ایڈوائزر کے دفتر میں ڈیوٹی نہ ہو کر دیا جائے۔ اور سائل کی 71 دن کی تنخواہ میں ٹیوٹی والی کی جائے کہ کامی لف ہے۔

سائل صاحبان زندگی دعا ٹوا رہیگا۔

امام موع
 Attested
 Mu7yh

الصالحی
 علیہ السلام
 L.R.H / mP



ATTENDANCE SHEET MONTH WISE

From Date: 26-SEP-17 To Date : 25-OCT-17

Department: Facilities Management-LRH
 Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																												Perform Actual		
			26	27	28	29	30	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23		24	25
			T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	
60000001137	GHULAM HUSSAIN	Cook	07:56	09:33		07:58	G	G	07:59	08:01	08:54	13:58	08:52			08:14	08:56	08:52	10:30	08:59		08:49	08:38	10:46	07:57	08:44			09:30	08:41	08:29	124:6	
			07:56	09:33		07:58			07:59	19:29	08:54	13:58	08:52			08:14	08:56	08:52	10:30	17:20			19:36	17:24	17:36	07:57	15:29			18:37	08:41	08:29	212:30

Section Wise Total : 1
 Department Wise Total : 1
 Grand Total : 1

15

Attested
 [Signature]



ATTENDANCE SHEET_MONTH_WISE

From Date: 26-OCT-17

To Date : 25-NOV-17

Department: Facilities Management-LRH

Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Perform Actual					
			26	27	28	29	30	31	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19		20	21	22	23	24
			T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
60000001137	GHULAM HUSSAIN	Cook	07:55	08:02	08:02	08:02	08:47	08:08	09:11	08:41	08:02	08:02	08:38	09:23	08:48	08:49	08:42	08:02	08:02	09:31	09:03	08:59	09:05	08:53	08:02	08:02	09:14	09:42	08:25	08:39	11:24	08:02	118:28
			07:55	17:38			08:47	14:57	09:11	17:14			16:48	09:23	21:19	20:37	08:42			17:41	09:03	16:56	16:23	17:30			19:20	09:42	17:30	18:26	11:24		229:30

Section Wise Total : 1
 Department Wise Total : 1
 Grand Total : 1

18

Attested



ATTENDANCE SHEET_MONTH_WISE

From Date: 26-NOV-17

To Date : 25-DEC-17

Department: Facilities Management-LRH

Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Perform Actual					
			26	27	28	29	30	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20		21	22	23	24	25
			S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	
60000001137	GHULAM HUSSAIN	Cook		09:03	09:12	09:36	08:39	G	DD	W	09:34	09:00	09:11					09:25	09:08	08:46	09:16	09:01	DD	W	10:38	DD	W	17:49	17:51	DD	W	G	105:14
				09:03	09:12	18:42	17:47				09:34	09:00	17:01					16:43	19:47	17:22	09:16	09:01			10:38			17:49	17:51				195:30

Section Wise Total : 1

Department Wise Total : 1

Grand Total : 1

17

Attested
 [Signature]



ATTENDANCE SHEET MONTH WISE

From Date: 26-JAN-18

To Date : 25-FEB-18

Department: Facilities Management-LRH

Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Perform Actual					
			26	27	28	29	30	31	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19		20	21	22	23	24
			F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S
60000001137	GHULAM HUSSAIN	Cook	09:05 18:29			09:07 18:42	08:59 18:11	09:07 18:48	08:53 19:15	09:11 09:11			G	09:12 18:23	08:58 18:48		08:57 20:16			10:07 18:28	08:15 08:15	08:39 08:39	08:35 08:35	08:41 18:29			08:58 17:49	09:03 19:28	09:10 17:45	08:52 18:05	08:13 17:05	08:36 14:07	444:30 212:30

Section Wise Total : 1

Department Wise Total : 1

Grand Total : 1

18
18

Attested



ATTENDANCE SHEET_MONTH_WISE

From Date: 26-FEB-18

To Date : 25-MAR-18

Department: Facilities Management-LRH

Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Perform Actual		
			26	27	28	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22		23	24
			M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S
60000001137	GHULAM HUSSAIN	Cook	08:27	08:45	08:34	08:11	08:51	08:13	08:40	08:26	07:43	08:18	08:23	08:31	08:31	08:31	08:24	08:15	08:17	08:13	08:40	08:17	08:17	08:05	08:09	08:03	08:03	147:54		
			18:49	08:45	14:54	16:35	15:44	15:54	16:18	19:12	07:43	14:29	18:06	14:09	19:28	16:51	14:27	08:17	14:19	14:01	14:15	14:36	14:18	14:13	14:41			195:30		

Section Wise Total : 1

Department Wise Total : 1

Grand Total : 1

12
 12

Attended
 [Signature]

بعدالت

Before The Honorable Services
Tribunal Peshawar, KPK

2۔ مخانب

غلام حسین بنام گورنمنٹ آف کپک
و دیگر

موزخہ
مقدمہ
دعوی
جرم

باعث تحریر آنکے

مقدمہ مشدرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کاروائی متعلقہ

آن مقام پشاور کیلئے صنعتی ہنگامہ ایجوکیشن

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعوی اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعوی اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
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 بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

غلام حسین

Accepted

Handwritten signature

المرقوم 17 ماہ جنوری 2019

کے لئے منظور ہے۔

بمقام لیسٹور

غلام حسین ولد غلام مسرور مکملہ لیسٹور و ل RRA



**LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR**

OFFICE ORDER

Whereas Mr. Muhammad Waris S/O Abdul Wahab Ward Orderly had performed his duty in the Institution and in pursuance to the Director General Health Services K.P. Office Order bearing No. 7018-20/Personnel dated 18.09.2018, 43 days deduction is hereby refunded to him.

Sd/XXX

**Hospital Director
LRH-MTI Peshawar**

41
NO. 1737 /LRH/E-IV

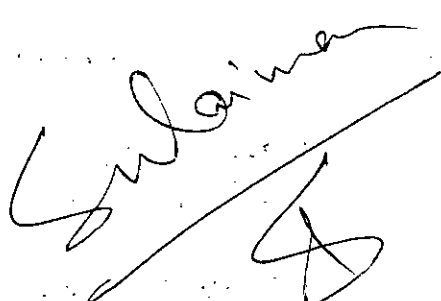
Dated 18/01/2019

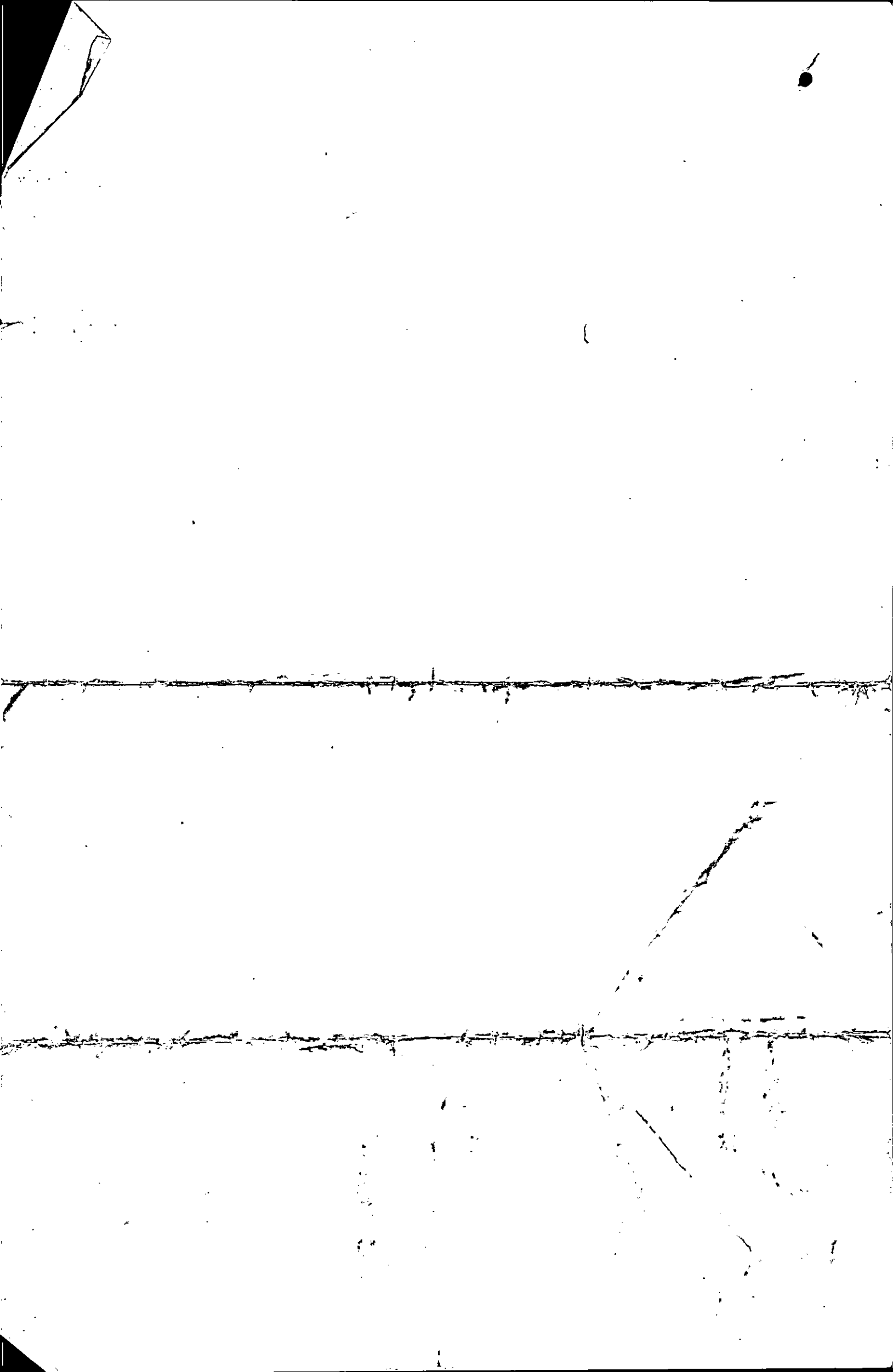
Copy forwarded to:-

1. The Budget and Accounts Officer, LRH-MTI Peshawar.
2. Facility Manager, MTI.LRH Peshawar.
3. Associate Hospital Director, LRH-MTI Peshawar.
4. Secretary to Hospital Director, MTI.LRH Peshawar.
5. Official concerned.

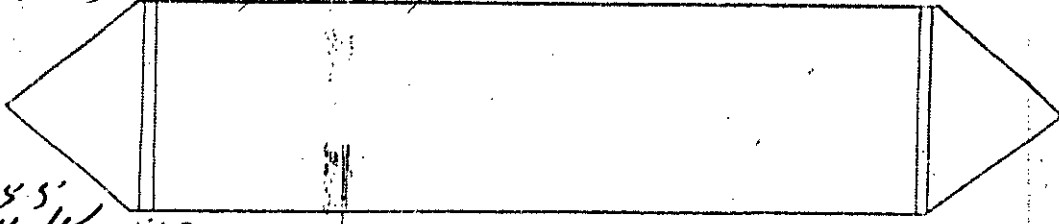
For information and n/action.


**Director Human Resources
LRH-MTI Peshawar**
17/1/19





بعد الت حساب سروس بیرونی ضمیمہ ڈیوڈا لیسار



۲۰۱۹ء میں جاری شدہ سروس

عدم صحت بنام گورنمنٹ ہسپتال ڈیوڈا

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہ ذہنی دکل کاروائی متعلقہ
 آن مقام لیسار کیلئے خلیفہ اللہ خلیفہ اللہ نے
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا گیا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء آور صولی چیک درو پیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم بیرونی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظریاتی و بیرونی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 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 بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ
 پروا خستہ منقولہ قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ بیرونی
 مذکور کریں۔ لہذا وکالت نامہ لکھو یا کہ مندر ہے۔

الرقوم ۲۱ ماہ ص ۲۰۱۹

وہ

بمقام

HOSPITAL DIRECTOR
 Lady Reading Hospital-MFI
Peshawar...

Submitted
21/05/19

Case
Serial 1000
71 days deduction

**OFFICE OF THE CHIEF EXECUTIVE
GOVT. LADY READING HOSPITAL, PESHAWAR**

OFFICE ORDER

In pursuance of Govt. of NWFP Health Department No SO(ME)H-1/1-1/2001 dated 18/11/2001, Para 9 subsequent amendment vide No. LEGIS:1(3)/99/639-45, dated 31st June 2002 section (10) Mr Ghulam Hussain S/O Ghulam Sarwar, Dalazak Road Gul Abad No 1 Street No 4 Peshawar City is hereby appointed as Cook BPS-1 plus all usual allowances admissible under the Government Rules on contract basis for a period of 1 year on the following terms and conditions from the date of joining.

1. His appointment is subject to Medical fitness certificate by the Civil Surgeon Peshawar.
2. He will not be considered as Government Servant but will be treated as employees of Lady Reading Hospital, Peshawar to be Governed by the rules notified by Government.
3. His Services can be terminated at any time without assigning any reason, however if he want to resign then he will have to give a notice of 30 days or in lieu thereof will forfeit an amount equivalent to his thirty day salary.
4. His appointment will be subject to verification of his character from the chairman of her respective union council.
5. He will not be entitled to pension, seniority and leave except casual and earned leave.
6. During the employment the NWFP Govt. Servant conduct Rules, 1987, the NWFP (E&D) Rules 1973, Civil Servant Rules 2000, West Pakistan Medical Attendant Rules 1959, the NWFP Medical & Health Institutions Reform Act 1999 and the NWFP Medical Institution Rules 2001 shall be applied on them with Govt. Servant Revised leave Rules 1981 except Rule 4(III), 6,7,11,14,20,21 and 26.

Medical Superintendent
Govt. LRH, Peshawar

Dated 26/5 /2002

- Govt. LRH, Peshawar
- Govt. LRH, Peshawar.
- Govt. LRH, Peshawar
- Govt. LRH, Peshawar
- Govt. LRH, Peshawar

Medical Superintendent
Govt. LRH, Peshawar

21289-94^{LRH}

- Copy for information to the:
1. DMS (Admn)
 2. Director Finance
 3. DMS (R&M)
 10. PA to Chief Executive
 11. Head Class IV
 12. Ghulam Hussain S/O Ghulam Sarwar, Cook Dalazak-Road Gul Abad No' 1 Street No 4 Peshawar City

[Handwritten signature]

M. Sabir
(Office Order(3))

Before The Hon'ble Services Tribunal, Peshawar KPK

Ghulam Hussain _____ Appellant

VERSUS

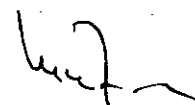
Director Health & others _____ Respondents

Application for Extending of hearing
date in order to submit the process fee.

Respectfully Sheweth,

- That in the above mentioned titled appeal, today's date i.e. 19-08-2019 is fixed for hearing.
- That on previous date the appeal in hand was admitted and notice to respondents for reply was to be issued after submitting of process fee.
- That the process fee was not submitted within due time, hence this application for extending of hearing date as well as to submit the process fee.

Dated 19-08-2019

Appellant
Through 
Muzamil Shah
Advocate

بعد الت سروس ٹریبونل لیسہ

Servia Appeal No. 78/19

LRH/R.

عندم حسن بنام حکومت و سروس

موزنہ
مقدمہ
دعوی
جرم

باعث تخریب آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ~~کیلئے~~ ~~سروس ٹریبونل~~ ~~برائے~~ ~~خان کفری~~
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہونا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریرت الٹ و فیصلہ بر حلف دینے جواب دہی اور اقبال دعوی اور
بصورت ڈگری کرنے اجراء آدرصدولی چیک درو پیہ ارضی دعوی اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہونا۔ نیز صورت عدم پیروی یا ڈگری کیلئے یا اپیل کی براندگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہونا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار
ہونا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ
پر داخستہ منظر اور قبول ہونا۔ دوران مقدمہ میں ہونے چہ ہر بابہ التوا سے مقدمہ کے سبب سے وہ ہونا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو و وکیل صاحب پابند ہوں گے۔ کہ پیروی
نہ کنو کرے۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

البرقونم 13 ماہ صوی 2020

کے لئے منظور ہے۔

[Signature]

الشیخ

[Signature]

BC No-17-7838

Mo No-310-5460000

HOSPITAL DIRECTOR
Lady Reading Hospital-MTI
Peshawar

BEFORE THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal.No.78/2019

Ghulam Hussain

.....Appellant

Versus

Government of Khyber Pakhtunkhwa & Others

.....Respondent

WRITTEN REPLY FOR AND ON BEHALF
OF THE RESPONDENT NO.02

Preliminary Objections:

Respectfully Sheweth;

1. That the instant service appeal as laid down is bad in both law and facts, hence not tenable.
2. That the Appellant has no locus standi against the answering respondents.
3. That the Appellant has not come to this august court with clean hands and has concealed material facts from this august court.
4. That the instant service appeal is frivolous in nature and is only meant for the purpose of harassing and pressurizing the Respondents.

On Facts:

1. **Correct to the extent** that the Appellant was appointed as a cook.

2. **Completely false and incorrect.** The salary of the Appellant has been withheld due to the non-performance of his duty. The Appellant was transferred to the Assistant Director (Legal) Office vide Office Order No.493/AHD/LRH-MTI dated 09.10.2017 but failed to join his assigned place of duty. The Appellant was issued Notice No.32417-29/AHD/PA/LRH dated 10.11.2017 calling for an explanation within three (03) days regarding his absence from duty but no response was tendered. In pursuance, another Notice No.33101-10/AHD/PA/LRH dated 16.11.2017 was sent demanding explanation from the Appellant regarding his sustaining absence from duty but, as previously, no response was received. The Respondents, left with no other resort, decided vide Letter No.0667-062 dated 20.12.2017 to issue Show Cause Notice to the Appellant for his long absence from duty. Finally, after deliberate and repeated avoidance to submit an explanation, Show Cause Notice vide Letter No.1489-91/LRH/E-IV dated 15.01.2018 was issued to the Appellant, also warning him of the consequences of not responding to the same. No response was received. The Appellant had resumed his duty on 10.01.2018. In consequence, the Respondents issued Letter No.0971-0976/AHD/PA/LRH dated 20.02.2018 wherein the salary for the period of absence from duty i.e. seventy-one (71) days, from 09.10.2017 to 10.01.2018 was deducted.

(True copies of the Notices & Letters are marked as Annexures – A)

3. **Correct to the extent** that the Appellant submitted an application against the deduction of his salary on 21.02.2018. The Application was rejected vide Letter

No.1106-1110/AHD/PA/LRH dated 01.03.2018 wherein the reasons for rejection were mentioned.

(True copy of the Letters dated 21.02.2018 & 01.03.2018 are marked as Annexures – B & C)

4. **Denied as incorrect in its entirety.** As explained in the above paras.
5. **Incorrect, hence denied.**

Grounds:

- a) **Grossly incorrect, hence, denied.** There has been no discrimination against the Appellant. The Appellant deliberately avoided responding to the notices issued by the Respondent and failed to justify his absence or clarify his position.
- b) **Grossly incorrect, hence, denied.** The Appellant has been proceeded against in accordance with the law, following due procedure as explained in Para “2”.
- c) **Correct to the extent** that Article 25 of the Constitution of the Islamic Republic of Pakistan, 1973 (hereinafter referred to as “**Constitution**”) provides for the equality of citizens. The Appellant has been treated in accordance with the law and procedure which applies equally to all. The Respondents have in no way, shape or form “abrogated” the Constitution.
- d) **Grossly incorrect, hence, denied.** Detailed explanation is provided in Para “2”.
- e) **Grossly incorrect, hence, denied.** As explained in Para “b”.
- f) **Grossly incorrect, hence, denied.** Detailed explanation is provided in Para “2”.


g) **Incorrect, hence, denied.** The Appellant can only rely on valid grounds.

In view of the above, it is most humbly prayed that the instant service appeal, having no legal ground, be dismissed with costs.

February 24th, 2020

Respondent No.2

Through


Barrister Ibrahim Khan Afridi
Advocate High Court(s)

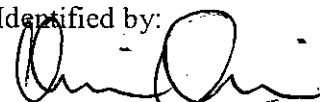
Legal Advisor
Lady Reading Hospital

60-C, 2nd Street, Defence Officers Colony, Khyber Road, Peshawar

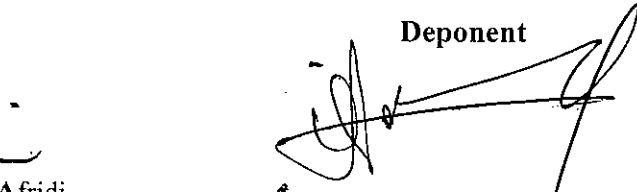

AFFIDAVIT

I, Waheed Mahmood s/o Muhammad Afzal
R/o CRP, Khyber Pakhtunkhwa do hereby solemnly declare and affirm on oath that the contents of the accompanied Written Statement are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.

Deponent

Identified by:

Barrister Ibrahim Khan Afridi
Advocate High Court(s)

Legal Advisor
Lady Reading Hospital


ATTESTED

24-2-2020



OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

LADY READING HOSPITAL, MEDICAL TEACHING INSTITUTION, PESHAWAR
Phone # +92-91-9211439 Ext: 185 Facsimile: 0992-019211401 www.lrh.gov.pk

Ref No LS 70/AHD/PA/LRH

Dated: 19/02/2018

To,
The Hospital Director
Lady Reading Hospital, MTI
Peshawar

Subject: RELEASE OF SALARY OF CLASS-IV

It is for your information that all the requirements are fulfilled by the Class-IV relieved staff and their salaries may please be released as mentioned below.

S. No.	NAME	FATHER NAME	DESIGNATION	REMARKS
1.	Mr. Sartaj	Muhammad Khan	Lift Operator	Release Full
2.	Mr. Shahid Masih	Waris Masih	Sweeper	Release Full
3.	Mr. Ishaq Buta	Buta Masih	Sweeper	Release Full
4.	Mr. Munawar Lal	Lal Din	Sweeper	Release Full
5.	Mr. Tahir Khan	Syed Khan	Dhobi	Release Full
6.	Mr. Muhammad Waris	Abdul Wahab	Ward Orderly	Release Full
7.	Mr. Hayat Khan	Taza Khan	Behishti	43 Days salary to be Deducted
8.	Mr. Fazole Moola	Fazal Rahim	Attendant	Release Full
9.	Mr. Noor Rahim	Abdul Kabeer	Ward Orderly	Release Full
10.	Mr. Mahabat Khan	Hasham Khan	Ward Orderly	Release Full
11.	Mr. Asif Khan	Alamzeb	Naib Qasid	Release Full
12.	Mr. Ghulam Hussain	Ghulam Sarwar	Cook	Release Full
				71 Days salary to be Deducted

No. 0971-0976
/AHD/PA/LRH

Copy forwarded to information and necessary action:-

1. Director Human Resource
2. Director Finance
3. Assistant Director Legal
4. Budget & Accounts Officer
5. PA to Associate Hospital Director
6. Dealing Assistant Class-IV

Attested

-----Sd-----
ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar
Dated: 20/02/2018

- LRH, MTI, Peshawar
- LRH, MTI, Peshawar
- LRH, MTI, Peshawar
- LRH, MTI, Peshawar
- LRH, MTI, Peshawar
- LRH, MTI, Peshawar

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

20/02/18

**OFFICE OF THE CHIEF EXECUTIVE
GOVT. LADY READING HOSPITAL, PESHAWAR**

OFFICE ORDER

In pursuance of Govt. of NWFP Health Department No SO(ME)H-II/1-1/2001 dated 18/11/2001, Para 9 subsequent amendment vide No. LEGIS:1(3)/99/639-46, dated 31st June 2002 section (10) Mr Ghulam Hussain S/O Ghulam Sarwar, Dalazak Road, Gul Abad No 1 Street No 4 Peshawar City is hereby appointed as Cook BPS-1 plus all usual allowances admissible under the Government Rules on contract basis for a period of 1 year on the following terms and conditions from the date of joining.

1. His appointment is subject to Medical fitness certificate by the Civil Surgeon Peshawar.
2. He will not be considered as Government Servant but will be treated as employees of Lady Reading Hospital, Peshawar to be Governed by the rules notified by Government.
3. His Services can be terminated at any time without assigning any reason, however if he want to resign then he will have to give a notice of 30 days or in lieu thereof will forfeit an amount equivalent to his thirty day salary.
4. His appointment will be subject to verification of his character from the chairman of her respective union council.
5. He will not be entitled to pension, seniority and leave except casual and earned leave.
6. During the employment the NWFP Govt. Servant conduct Rules, 1987; the NWFP (E&D) Rules 1973, Civil Servant Rules 2000, West Pakistan Medical Attendant Rules 1969, the NWFP Medical & Health Institutions Reform Act 1999 and the NWFP Medical Institution Rules 2001 shall be applied on them with Govt. Servant Revised leave Rules 1981, except Rule 4(III), 6,7,11,14,20,21 and 26.

Medical Superintendent
Govt. LRH, Peshawar

Dated 26/9 /2002

Govt. LRH, Peshawar
Govt. LRH, Peshawar
Govt. LRH, Peshawar
Govt. LRH, Peshawar
Govt. LRH, Peshawar

Medical Superintendent
Govt. LRH, Peshawar

21289-94^{LRH}

Copy for information to the:

1. DMS (Admn)
2. Director Finance
3. DMS (R&M)
10. PA to Chief Executive
11. Head Class IV
12. Ghulam Hussain S/O Ghulam Sarwar, Cook Dalazak-Road Gul Abad No 1 Street No 4 Peshawar City

M. Sobir
Office Order(3)

Lady Reading Hospital

March, 2019

Birth 02 AUG 1976

777-01-000081
GHULAM HUSSAIN
Cook

BPS04 N.T.N

PAYMENTS

001 Substantive Pay		15180.00
131 Conveyance Allowance		1785.00
134 House Allowance		1458.00
154 Ad-hoc Rel. Allow.(2013)		350.00
163 Ad-hoc Rel. Allow.(2015)		243.00
164 Ad-hoc Allowance (2016)		1235.00
166 Ad-hoc Allowance (2017)		1518.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		48233	7700.00 ✓
335 CP Fund	1750119982332	30340	384.00
381 Benevolent Fund			300.00

TOTAL PAYABLES 23,275

Balance

QUALIFYING SERVICE

15 YRS 6MON

TOTAL PAYABLES 8,290.00
NET AMOUNT PAYABLE 14,985

BANK MCS
BRANC 0858 LRH
ACCOUNT 0095802010039079

Lady Reading Hospital

April, 2018

777-01-000081
GHULAM RUSSAIN
Cook

Birth 02 AUG 1978

BPS04 N.T.N

PAYMENTS

001 Substantive Pay	15180.00
131 Conveyance Allowance	1785.00
134 House Allowance	1458.00
154 Ad-hoc Rel. Allow.(2013)	356.00
163 Ad-hoc Rel. Allow.(2015)	243.00
164 Ad-hoc Allowance (2016)	1236.00
166 Ad-hoc Allowance (2017)	1518.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		38517	7706.00
335 CP Fund	1790115982895	30724	384.00
381 Benevolent Fund			300.00

TOTAL W/ Balance 25,275

TOTAL W/ 8,990.00

NET AMOUNT PAYABLE 34,265

QUALIFYING SERVICE
15 YRS 7MON

BANK MCB
BRANC 0858 LRH
ACCOUNT 0095802010039079

Lady Reading Hospital

May, 2018

Birth 02 AUG 1970

777-01-000081
GHULAM HUSSAIN
Cook

BPS 04 N.T.N

PAYMENTS

001 Substantive Pay		15180.00
131 Conveyance Allowance		1785.00
134 House Allowance		1468.00
154 Ad-hoc Rel. Allow.(2013)		356.00
163 Ad-hoc Rel. Allow.(2015)		243.00
164 Ad-hoc Allowance (2016)		1235.00
166 Ad-hoc Allowance (2017)		1512.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		63921	7708.00
335 CP Fund	1790115082505	31109	384.00
381 Benevolent Fund			300.00

TOTAL ** 23,275

Balance

QUALIFYING SERVICE

15 YRS 8MON

TOTAL ** 8,296.00
NET AMOUNT PAYABLE 14,985

BANK MCB
BRANC 0858 LRH
ACCOUNT 0095802010039079

Lady Reading Hospital

June, 2018

777-01-000081
GHULAM HUSSAIN
Cook

Birth 02 AUG 1978

BPS 04 N.T.M

PAYMENTS

001 Substantive Pay		15180.00
131 Conveyance Allowance		1785.00
134 House Allowance		1458.00
154 Ad-hoc Rel. Allow.(2013)		356.00
163 Ad-hoc Rel. Allow.(2015)		243.00
164 Ad-hoc Allowance (2016)		1236.00
166 Ad-hoc Allowance (2017)		1518.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		7706.00
335 CF Fund	1730118282882	384.00
381 Benevolent Fund		300.00

TOTAL PAY Balance 23415 23415 21482 21482

QUALIFYING SERVICE
15 YRS 9MON

TOTAL PAY NET AMOUNT PAYABLE 6,890.00 14,885

BANK MCB
BRANC 0858 LRH
ACCOUNT 0095802010039079

Lady Reading Hospital

July, 2018

Birth 02 RDW 1978

777-01-000081
GHULAM HUSSAIN
Cook

BPS 04 N.T.N

PAYMENTS

001 Substantive Pay		15180.00
131 Conveyance Allowance		1785.00
134 House Allowance		2187.00
154 Ad-hoc Rel. Allow.(2013)		356.00
163 Ad-hoc Rel. Allow.(2015)		243.00
164 Ad-hoc Allowance (2016)		1235.00
166 Ad-hoc Allowance (2017)		1518.00
167 Ad-hoc Allowance (2018)		1518.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		15409	7706.00
335 CP Fund	1720118382835	31676	384.00
381 Benevolent Fund			300.00

TOTAL **
Balance

25,523

QUALIFYING SERVICE

15 YRS 10MON

TOTAL **
NET AMOUNT PAYABLE

8,920.00

17,152

BANK MCB
BRANC 0958 LRH
ACCOUNT 0095802019039079

خدمت جناب AHD صاحب کو ذیل کے مسئلے کے متعلق MPJ سے 109

عنوان: درخواست برائے تنخواہ میں 71 دن کی موٹی والی کی جائے۔ ریفرنس نمبر 0970/AHD/PA/LRH

جناب عالی۔
R/S in, Submitted for Pursal & order Pleas

1 یہ کہ حکم نمبر 2017 کو ڈاکٹر صاحبان نے کاماہ لیسے یعنی حکم نمبر 2018 کے تحت رائٹ ڈیوٹی کرنے کی ہدایت کی ہے جو کہ کامی لے ہے۔

2 یہ کہ سائل کو مورخہ 15/1/2018 کو مرسلہ نمبر 1487-88/LRH/ETV وصول ہوا ہے۔ جس کے بعد سائل نے مورخہ 18/1/2018 کو سٹوکار نوٹس کا جواب دیا۔ جس کا ڈاکٹر صاحبان نے 277 اے ہے۔

3 یہ کہ اس دوران سائل کی لیٹل ایڈوائز کے دفتر میں ڈیوٹی کرنے کا کیا تھا۔ جو کہ بندہ نے صافری رپورٹ کی ہے جو کہ کامی لے ہے۔

4 یہ کہ سائل کو مورخہ 2/2/2018 کو مرسلہ نمبر 0977-0988 AHD/PA/LRH وصول ہوا ہے۔ جس کے بعد سائل نے آڈیٹ کے مطابق پراسسنگ کی وائر میں اپنی صافری رپورٹ پیش کی جس کی کامی لے ہے۔

5 یہ کہ اس دوران سائل کو مورخہ 2/2/18 کو مرسلہ نمبر 0970/AHD/PA/LRH وصول ہوا جس میں سائل کی تنخواہ سے 71 دن کی موٹی کی گئی ہے۔ کامی لے ہے۔

لہذا آپ صاحبان کی خدمت میں درخواست مل کر ہے کہ سائل کو لیٹل ایڈوائز کے دفتر میں ڈیوٹی پر چھوڑ دیا جائے۔ اور سائل کو 71 دن کی تنخواہ میں موٹی والی کی پندرہ سالہ کامی لے کا موقع دینے کے لئے سائل صاحبان کو دعاؤں اور دعاؤں کے ساتھ۔

امامیہ / 2/18/2018
ADMINISTRATION SECTION
D.O. 3571
D.D. 21/02/18
Secy. LRH FES/PA

الصالحی
عن نواز نسیم
غلام حسین
آپ کا طالب علم محمد حسین ولد محمد سرور
نمبر 0970/AHD/PA/LRH



ATTENDANCE SHEET MONTH_WISE

From Date: 26-AUG-17

To Date : 25-SEP-17

Department: Facilities Management-LRH
 Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Percentage					
			26	27	28	29	30	31	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19		20	21	22	23	24
			S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M
60000001137	GHULAM HUSSAN	Cook			37:49	11:24	08:09	08:28					10:21	08:03	09:14	07:41			08:23	12:34	09:35	12:08					08:04	08:51					18.39
					07:49	19:44	08:09	08:28					10:21	18:21	09:14	07:41			08:23	12:34	09:35	12:08					08:04	08:51					221.0

Section Wise Total : 1
 Department Wise Total : 1
 Grand Total : 1

17/9
 18/9



ATTENDANCE_SHEET_MONTH_WISE

From Date: 26-OCT-17 To Date: 25-NOV-17

Department: Facilities Management-LRH
 Section: Facilities Management-LRH

No	Name	Designation	Duty Date																									Perform								
			T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	Actual									
100001137	GHULAM HUSSAIN	Cook	07:55	08:02			08:47	08:56	09:11	08:41					08:36	09:23	08:48	08:49	08:42					09:31	09:03	08:59	09:05	08:53			08:14	09:42	08:25	08:39	11:24	118:28
			07:55	17:38			08:47	14:57	09:11	17:14					16:48	09:23	21:19	20:37	08:42					17:41	09:03	16:58	16:23	17:30			19:20	09:42	17:30	16:26	11:24	229:30

Section Wise Total : 1
 Department Wise Total : 1
 Grand Total : 1

Handwritten initials/signature in the left margin.

Lady Reading Hospital, MTI Peshawar
 Lady Reading Hospital, MTI Peshawar. Phone: 091-9211430. Fax: --
 Email: info@lrh.gov.pk. Website: www.lrh.gov.pk
ATTENDANCE SHEET MONTH WISE



From Date: 26-SEP-17 To Date: 25-OCT-17

Department: Facilities Management-LRH
 Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Per Diem						
			T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	Actual								
60000001137	GHULAM HUSSAN	Cook	07:56	09:33		17:58	G	G	07:59	08:01	08:54	13:58	08:52			08:14	08:56	08:52	10:30	08:59			08:49	08:38	10:46	07:57	08:44			08:30	08:41	08:29	124.6	
			07:56	09:33		07:58			07:59	19:29	06:54	13:58	08:52											19:36	17:24	17:36	07:57	15:29			18:37	08:41	08:29	212.36

Section Wise Total : 1
 Department Wise Total : 1
 Grand Total : 1

16



From Date: 26-NOV-17 To Date: 25-DEC-17

Department: Facilities Management-LRH
 Section: Facilities Management-LRH

Code	Name	Designation	Day Date																									Actual					
			26	27	28	29	30	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20		21	22	23	24	25
			S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	
60000001137	GHULAM HUSSAIN	Cook		09:03	09:12	09:38	09:39	G			09:34	09:00	09:11					09:25	09:09	09:46	09:16	09:01			10:30			17:49	17:51		G	105.14	
Section Wise Total :																																	
Department Wise Total :																																	
Grand Total :																																	

(17)

ATTENDANCE SHEET MONTH WISE



From Date: 26-JAN-18 To Date : 25-FEB-18

Department: Facilities Management-LRH
 Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																												Presence	Absent		
			26	27	28	29	30	31	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22			23	24
			F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	
60000001137	GHULAM-HUSSAN	Cook	09:05 18:29			09:07 18:42	09:59 18:11	09:07 18:48	09:53 19:15	09:11 09:11																								
Section Wise Total :			1																															
Department Wise Total :			1																															
Grand Total :			1																															

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From Date: 26-FEB-18 To Date : 25-MAR-18

Department: Facilities Management-LRH
 Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Particulars			
			26	27	28	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22		23	24	25
			M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	Actual
60000001137	GHULAM HUSSAN	Cook	08:27 18:49	08:45 08:45	08:34 14:54	08:11 18:35	08:51 15:44	08:13 15:54		08:40 16:18	08:26 19:12	07:43 07:43	08:18 14:29	08:23 16:06	08:31 14:09		08:31 19:28	08:34 16:51	08:15 14:27	08:17 08:17	08:13 14:19	08:40 14:01		08:17 14:15	08:17 14:38	08:05 14:18	08:09 14:13	08:03 14:41	147.54 195.36		
Section Wise Total :																												1			
Department Wise Total :																												1			
Grand Total :																												1			

Handwritten marks and signatures in the left margin.



OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

LADY READING HOSPITAL, MEDICAL TEACHING INSTITUTION, PESHAWAR
Phone # +92-91-9211430 Ext: 185 Facsimile: 0092-919211401 www.lrh.gov.pk

Ref. No. ¹¹⁰⁵ /AHD/PA/LRH

Dated: 01/03/2018

To,

Mr. Ghulam Hussain S/O Ghulam Sarwar, Cook
Lady Reading Hospital, MTI
Peshawar.

Subject: LETTER DATED 20/01/2018 D.NO. 3571 DATED 21.02.2018

References to your letter dated 20/02/2018 vide D. No. 3571 dated 21/02/2018 regarding your queries the following are the answers to your questions.

1. You have been given light duty as advised by the Doctor in Assistant Director legal office vide letter No. 493/AHD/LRH/MTI dated 09.10.2017 which you refused and did not join your place of duty.
2. The reply to your show cause notice was not satisfactory as you have mentioned that you have not received any explanation or letter, you have been served several times but you refused to accept these letters which is totally violating the rules and were found involved in illegal activities.
3. You have given arrival report to Assistant Director Legal office on 10.01.2018.
4. After that you have been transferred to Plastic surgery ward and assured about the tight duty there.
5. Your salary has been deducted (71 days) due to not attending your duty that is Assistant Director legal office as mentioned in para-1 and involvement in illegal activities during the absent period i.e. from 09.10.2017 to 10.01.2018.

No. ¹¹⁰⁶⁻¹¹¹⁰ /AHD/PA/LRH

Copy forwarded to information:-

1. Hospital Director
2. Director Human Resource
3. Assistant Director Legal
4. PA to Associate Hospital Director
5. Dealing Assistant Class-IV

-----Sd-----
ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar
Dated: 01/03/2018

LRH, MTI, Peshawar
LRH, MTI, Peshawar
LRH, MTI, Peshawar
LRH, MTI, Peshawar
LRH, MTI, Peshawar

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

Handwritten notes:
Personal file
For 71
19/3/18
E-IV

92

LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION PESHAWAR

No. 3428 /LRH/E-IV,

Dated. 30 / 11 / 2017.


To

Mr. Ghulam Hussain S/O Ghulam Sarwar
Cook, LRH/MTI, Peshawar

Subject:- **APPLICATION FOR LIGHT DUTY.**

Memo:

Your request can not, it is regretted be acceded to, as you have been given light duty in legal Department.


Hospital Director
LRH/MTI Peshawar.
28/11

(4) *JK*

OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

LADY READING HOSPITAL, MEDICAL TEACHING INSTITUTION, PESHAWAR
Phone # +92-91-9211-430 Ext: 185 Facsimile: 0092-919211401 www.lrh.gov.pk

Ref No: /AHD/PA/LRH

Dated: /11/2017

- To
1. Mr. Ghulam Hussain S/O Ghulam Sarwar, ~~Ward Orderly~~ ^{COOK}, AD Legal Office
 2. Mr. Saleem S/O Mukarab, Ward Orderly HD Office
 3. Mr. Muhammad Ali S/O Dalil Khan, Ward Orderly, Emergency Department
 4. Mr. Zahid S/O Muhammad Ali, ~~Ward Orderly~~ ^{Ch. Kider}, Physiotherapy Department

Subject: EXPLANATION

You were transferred vide office order no. 493/AHD/LRH-MTI dated 09.10.2017 but you failed and did not join your place of duty.

You are directed to explain your position within three (03) days and report to your place of duty otherwise strict disciplinary action will be taken against you as per rules.

Sd /
ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

Dated: /11/2017

LRH, MTI, Peshawar
LRH, MTI, Peshawar

LRH, MTI, Peshawar
LRH, MTI, Peshawar
LRH, MTI, Peshawar
LRH, MTI, Peshawar

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

32417-29

No. /AHD/PA/LRH

Copy forwarded to:

13. Hospital Director
14. Director Finance
with the request to stop their salary immediately
15. Director Physiotherapy
16. Director Emergency
17. Assistant Director Legal
to submit report regarding their arrival/absenteeism
18. Director Human Resource
19. Manager Security
20. Secretary BoG
21. Dealing Assistant Class-IV

[Signature]
HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar



OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

LADY READING HOSPITAL, MEDICAL TEACHING INSTITUTION, PESHAWAR
Phone # +92-91-9211430 Ext: 185 Facsimile: 0092-919211401 www.lrh.gov.pk

Ref No: /AHD/PA/LRH

Dated: 11/11/2017

REMINDER #1

To

1. Mr. Ghulam Hussain S/O Ghulam Sarwar, Ward Orderly, AD Legal Office
2. Mr. Saleem S/O Mukarab, Ward Orderly HD Office
3. Mr. Muhammad Ali S/O Dalil Khan, Ward Orderly, Emergency Department
4. Mr. Zahid S/O Muhammad Ali, Ward Orderly, Physiotherapy Department

Subject: **EXPLANATION**

You were transferred vide office order no. 493 AHD/LRH/MTI dated 09.10.2017 and reminder letter No. 32417-29 dated 10.11.2017 to report to your place of duty and explain your position within 03 days but you failed, did not join your place of duty and showed disobedience during duty.

You are once again directed to explain your position within three (03) days as why you are not obeying internal transfer orders, otherwise strict disciplinary action will be taken against you as per rules.

Sd
ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

Dated: 16/11/2017

LRH, MTI, Peshawar
LRH, MTI, Peshawar

LRH, MTI, Peshawar
LRH, MTI, Peshawar
LRH, MTI, Peshawar
LRH, MTI, Peshawar

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

33101-10

No. /AHD/PA/LRH

Copy forwarded to:

1. Hospital Director
2. Director Finance
3. Director Physiotherapy
4. Director Emergency
5. Assistant Director Legal
to submit report regarding their arrival/absenteeism
6. Director Human Resource
7. Manager Security
8. Secretary BoG
9. Dealing Assistant Class-IV

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OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

LADY READING HOSPITAL, MEDICAL TEACHING INSTITUTION, PESHAWAR
Phone # +92-91-9211430 Ext: 185 Facsimile: 0092-919211401 www.lrh.gov.pk

Ref No: 0666/AHD/PA/LRH

Dated: 20/12/2017

The Hospital Director,
Lady Reading Hospital, MTI
Peshawar

Subject: **SHOWCAUSE NOTICE**

It is to bring it in your kind notice that the following Class-IV staffs are not performing their duties in their respective areas. Explanations were called from them but they do not bother to reply or report even after verbal negotiations.

1. Mr. Muhammad Iqbal S/O Sarfaraz, Ward Orderly, Emergency Department
2. Mr. Liaqat Ali Khan S/O Jamil Khan, Ward orderly, Emergency Department
3. Mr. Ghulam Hussain S/O Ghulam Sarwar, Ward orderly, AD Legal Office
4. Mr. Saleem S/O Muqarab, Ward orderly, Hospital Director Office

You are requested issue them show cause notices.

-----Sd-----
ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

No. 0667-0673 /AHD/PA/LRH

Dated: 20/12/2017

Copy forwarded to:-

- | | |
|--------------------------------------|--------------------|
| 1. Director Human Resource | LRH, MTI, Peshawar |
| 2. Director Emergency | LRH, MTI, Peshawar |
| 3. Assistant Director Legal | LRH, MTI, Peshawar |
| 4. Manager Security | LRH, MTI, Peshawar |
| 5. PA to Associate Hospital Director | LRH, MTI, Peshawar |
| 6. Secretary to Hospital Director | LRH, MTI, Peshawar |
| 7. Dealing Assistant Class-IV | LRH, MTI, Peshawar |

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

97
LADY READING HOSPITAL, PESHAWAR
MEDICAL TEACHING INSTITUTION.

No. 487-88/LRH/E-IV

Dated 15-01-2018.

To,

Mr. Ghulam Hussain S/O Ghulam Sarwar (Cook)
Mr. Muhammad Saleem S/O Muqarab Khan (W/Orderly)
LRH/MTI Peshawar.

Subject: **SHOW CAUSE**

Memo:

I Dr. Khalid Masud, Hospital Director Lady Reading Hospital MTI Peshawar as competent authority, am of the opinion that you rendered yourself liable to be proceeded against you.

You committed the following acts/omissions, further your service falls under the essential service Act of 1958.

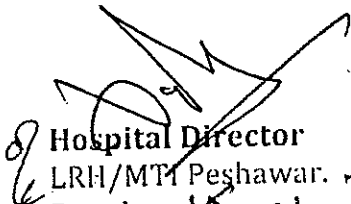
- i). **Explanation were called from them but they not bother to reply or report even after verbal negotiations.**

You are directed to show cause for the above stated allegation. Your reply must reach to the undersigned within Five (05) days of the issuance of this letter; otherwise strict disciplinary action would be taken against you as prescribed by law, failing which an ex-parte action will be taken against you.

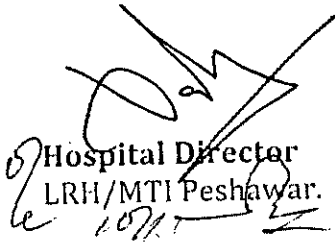
No. 1489-91/LRH/E-IV

Copy forwarded to:-

1. Associate Hospital Director, LRH/MTI Peshawar.
 2. Pa to Hospital Director, LRH/MTI Peshawar.
 2. Supervisor Class-IV, LRH/MTI Peshawar.
- For information and necessary action.


Hospital Director
LRH/MTI Peshawar.

Dated: 15-01-2018.


Hospital Director
LRH/MTI Peshawar.



OFFICE OF THE HOSPITAL DIRECTOR

Lady Reading Hospital, Medical Teaching Institution, Peshawar
Phone # 0092-919211402 Fax: 0092-919211401 www.lrh.gov.pk

OFFICE ORDER

In response to Director General Health Services Khyber Pakhtunkhwa letter No.686-709/Personnel dated 5/01/2018 and endorsement No.1898-912/E-V dated 29-01-2018, salary of Mr. Ghulam Hussain So Ghulam Sarwar Cook

LRH-MTI is hereby released with the condition that;

- He should be bound to join his place of duty immediately
 - The offices illegally occupied should be vacated immediately
 - An affidavit should be signed regarding his non-involvement in illegal activities. *copy attached*
- (These conditions may be verified and endorsed by concerned Head of Deptt to Director Finance for release of his salary).

Sd/-

HOSPITAL DIRECTOR
Lady Reading Hospital, MTI
Peshawar

Dated. 13 02 2018

No. 4429 - 34 /HD/LRH

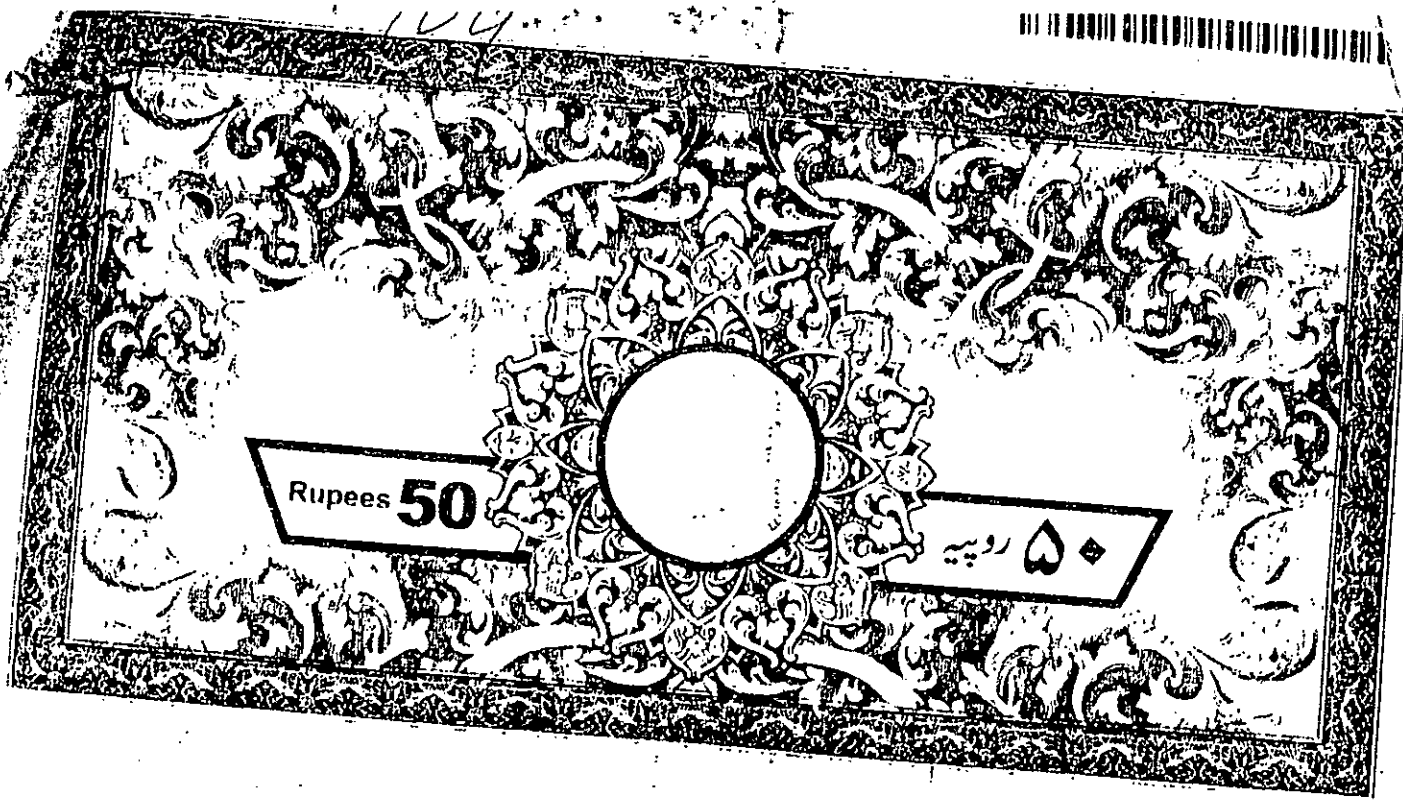
Copy forwarded for information and necessary action to:-

- Associate Hospital Director, LRH-MTI
- Director HR LRH-MTI
- Budget & Accounts Officer LRH-MTI
- Superintendent Establishment LRH-MTI Peshawar.
- Official concerned.
- Secretary to Hospital Director, LRH, MTI.

[Signature]
ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI- Peshawar.


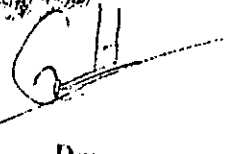
[Signature]
HOSPITAL DIRECTOR
Lady Reading Hospital, MTI
Peshawar

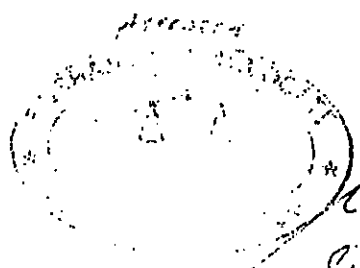
O/S



AFFIDAVIT

I Mr. Ghulam Hussain s/o Ghulam sever permanent resident of Deh Sak Road Gul Abad Peshawar serving as COOK in the Lady Reading Hospital, MTI (Medical Teaching Institution) Peshawar, do hereby solemnly affirm on oath at Peshawar that I would follow the rules, regulations and timely instructions issued by the Lady Reading Hospital, MTI Administration and my conduct would not be against the available general and special laws for protection of health services available to general public in this Hospital. Otherwise if found / involved in criminal activities or those acts which may be against the interests of the Hospital (LRH, MTI) or its premises or any staff/ official member of the hospital and directly or indirectly involved in obstructing health services, Hospital Administration may avail any legal remedy available and disciplinary action may be initiated taken against me. I would also follow the code of ethics/conduct issued time to time by the Hospital Administration issued for the conduct of the employees and abide by the code. I will not participate in any illegal activities which would be against the interests of this Hospital and overall general public.



Deponent


Jha
21.2.18

OFFICE OF THE CHIEF EXECUTIVE
GOVT. LADY READING HOSPITAL, PESHAWAR

OFFICE ORDER

In pursuance of Govt. of NWFP Health Department No SO(ME)H-1/1 1/2001 dated 18/11/2001, Para 9 Mr/ Muhammad Salim Khan S/O Muqarab Khan is hereby appointed as Ward Orderly BPS 02 plus all usual allowances on contract basis for a period of one year on the following terms and conditions from the date of joining.

1. His appointment is subject to Medical fitness certificate by the Civil Surgeon Peshawar.
2. He will not be considered as Government Servant but will be treated as employees of Lady Reading Hospital, Peshawar to be Governed by the rules notified by Government.
3. His Services can be terminated at any time without assigning any reason, however if he wish to resign then he will have to give a notice of 30 days or in lieu thereof will forfeit an amount equivalent to his thirty day salary.
4. His appointment will be subject to verification of his character

↓
Medical Superintendent
Govt. Lady Reading Hospital,
Peshawar

Dated .. 11/15/2002

No. 10820-23 /LRH

Copy for information to the:

1. The Director Finance Govt. LRH, Peshawar.
2. DMS (Admn) Govt. LRH, Peshawar
3. PA to Chief Executive Govt. LRH, Peshawar
4. Mr/ Muhammad Salim Khan S/O Muqarab Khan, Vill: & P/O Sably, Teh: & Distt: Abbottabad.

Medical Superintendent
Govt. Lady Reading Hospital,
Peshawar

OFFICE ORDER

GOVT. LADY READING HOSPITAL, PESHAWAR.

In pursuance of Provincial Assembly Secretariate No. PA/NWFP/Legis-1/2006/28421 dated 26/12/2006, Para-5, the services of the following contract Class-IV employees of Government Lady Reading Hospital Peshawar working on budgetary sanctioned posts are hereby regularized from the date of their appointment.

<u>S.No.</u>	<u>Name and father name</u>	<u>DATE OF ARRIVALS</u>
CHOWKIDAR		
1.	Mr. Muhammad Younas S/O Abdul Rehman	07.12.2006
2.	Mr. Fayyaz Alam S/O Nuntaz Khan	26.2.2007
3.	Mr. Mehraban Khan S/O Lal Muhammad	1.10.2003
4.	Mr. Muhammad Jehangir son of Gul Amir	21.7.2005
5.	Mr. Qaisar Khan son of Muhammad Pervez	22.3.2005
6.	Mr. Muhammad Riaz son of Abdul Rahim	21.3.2005
7.	Mr. Mr. Alam Sher son of Shamsheer	27.3.2004
8.	Mr. Shahid Iqbal son of Gul Khan	1.12.2003
9.	Mr. Rehman ullah son Abdul Rehman	13.01.2007
10.	Mr. Idrees Khan son Taj Bar Khan	10.11.2004
11.	Mr. Said ur Rehman son of Nawab Khan	Mali 16.5.2002
12.	Mr. Gul Sher son of Umar Khitab	Mali 12.5.2006
13.	Mr. Junaid Khan son of Mukarram Khan	Mali 13.2.2006
14.	Mr. Saeed ullah son of Zarif Khan	Fire Man---3.4.2004
15.	Mr. Muhammad Fayyaz son of Muhammad Ashraf	Lift Operator---13.5.2002
16.	Mr. Majid Khan son of Nazar Muhammad	Telephone attendant---9.2.2005
COOKS		
15.	Mr. Raja Gul son Dedar Gul	29.5.2002
17.	Mr. S halid Khan son of Muhammad Amin	25.3.2005
18.	Mr. Muhammad Sharif son of Ghulam Hussain	20.5.2002
19.	Mr. Kaleemullah son of H. Inayat Ullah	5.8.2005
20.	Mr. Ghulam Hussain son of Ghulam Sarwar	26.9.2002
21.	Mr. Muhammad Hussain son of H. Ghulam Jan	27.5.2002
NAIB QASIDS		
22.	Mr. Saleem Khan son of Shirin	15.5.2002
23.	Mr. Syed Jamal Shah son of S. Fazle Rabbi Shah	8.11.2004
24.	Mr. Asif Khan son of Alamzeb	24.3.2007
24.	Mr. Habib ur Rehman son of Noor Rehman	16.5.2002
BAHISHTIES		
23.	Mr. Abdul Ghafoor son of Chinar Gul	18.5.2002
25.	Mr. Baz Karam son of Muhammad Karam	10.2.2005
26.	Mr. Taimoor Khan son of Muhammad Waris	2.3.2006
27.	Mr. Firdaus Khan son of Masam Khan	29.8.2003
28.	Mr. Faiz ur Rehman son of Sabz Ali	20.5.2002
29.	Mr. Muhammad Arif son of Muzafar Khan	1.12.2003
30.	Mr. Ejaz Hussain son of Faqir Hussain	21.1.2003
31.	Mr. Azizullah son of Sardar Ali	29.8.2003
32.	Mr. Iftikhar son of Bismillah Jan	1.4.2007
WARD AYAS		
31.	Mrs. Nargis Bibi D/O Chiragh	Date of Arrival
33.	Mrs. Mukhtiar W/O Mir Ahmad Khan	16.5.2002
34.	Mrs. Gul Naz W/O Murad Ali	16.4.2006
35.	Mrs. Amina W/O Juma Gul	25.1.2005
36.	Mrs. Dilshad W/O Aziz Gul	16.2002
		20.2004

38.	Mrs. Shaheen Bibi W/O Zafar Ali	31.1.2006
39.	Mrs. Gul Mina W/O Sardar Khan	10.3.2005
40.	Mrs. Nansim Rafique W/O Rafiq	14.5.2002
41.	Mrs. Farhada W/O Saadullah Khan	8.1.2007
42.	Mrs. Naseem Begum W/O Muhammad Ayaz	2.12.2005

DHOBIES

43.	Mr. Arsala Khan son of Raza Khan	Date of Arrival 9.12.2003
44.	Mr. Muhammad Asif Raza son of Basheer Ahmad	23.11.2002
45.	Mr. Muhammad Javed son of Muhammad Zaman	27.5.2002
46.	Mr. Shakir ullah son of Rehmat Gul	28.10.2002
47.	Mr. Khiali Gul son of Fazle Rehman	26.9.2002
48.	Mr. Aalam Zeb son of Ali Bahadar	17.5.2002
49.	Mr. Muhammad Shahzad Ahmad son of Riaz Ahmad	1.1.2005
50.	Mr. Nasir Khan son of Misri Khan	29.5.2002

DAIS

51.	Mrs. Falooda wife of Habib Gul	Date of arrival 12.3.2005
52.	Mrs. Tasleem Begum wife of Muybarak Shah	14.5.2002
53.	Mrs. Tasleem wife of Abdul Malik	17.9.2002
54.	Mrs. Naseeb Rana wife of Mir Aftab	2.9.2006
55.	Mrs. Dilharam wife off Muhammad Nabi	18.5.2002
56.	Mr. Roohi Gul D/O Inayat ullah	30.12.2005
57.	Gulzara D/O Sultan Muhammad	17.1.2007
58.	Waheeda Naz wife of Tahir Shah	1.9.2006
59.	Shazia wife of Noor Muhammad	6.12.2005
60.	Shakeela wife of Jan Parvez	17.1.2007
61.	Bakht Pari wife of Zarab Khan	15.3.2005
62.	Parveen Bibi wife of Mehr Shah	17.1.2007
63.	Rubina wife of Darvesh	6.9.2004
64.	Farida Bano wife of Sanauallah	14.3.2005
65.	Saeeda Begum wife of Muhammad Ibrahim	4.9.2006
66.	Mukhtiar wife of Nadar Khan	5.12.2005
67.	Hayat Begum wife of Majid Gul	13.7.2004
68.	Nasreen wife of Habibur Rehman	15.3.2005
69.	Rukhsana Bibi wife of Muhammad Sharif	22.12.2004
70.	Haleema Bibi D/O Mustahuddin	11.10.2003

WARD ORDERLIES

71.	Ikramullah son of Kachkol	13.5.2002
72.	Muhammad Masaud son of Mniskeen Khan	11/10/2005
73.	Sufaid Gul son of Muhammad Noor	15.8.2002
74.	Riaz Muhammad son of Wazir Muhammad	6.4.2004
75.	Shakeel son of Abdul Rahim	31.3.2004
76.	Naseer Ahmad son of Dad Muhammad	7.2.2006
77.	Javed Khan son of Alam Khan	1.11.2005
78.	Masud Khan son of Mehmood Khan	8.1.2005
79.	Qasim son Abdul Rahim	8.10.2003
80.	Jehangir son of Fazle Subhan	23.1.2007
81.	Laiq Khan son of Izzat Khan	23.5.2002
82.	Darvesh son of Janas Khan	15.5.2002
83.	Muhamama Ayaz son of Ehsanullah	4.9.2006
84.	Muhammad Tariq son of Muhammad Anwar	12.11.2004
85.	Muhammad Sadiq son of Muhammad Qais	23.11.2002
86.	Muhammad Shoib son of Muhammad Tariq	23.11.2002
87.	Muhammad Hanif son of Noor Zaman	16.5.2002
88.	Yaliya Khan son of Musa Khan	23.9.2004
89.	Abdul Wahid son of Gul Muhammad	15.5.2002

(2)

87.	Balauch Khan son of Siraj	13.5.2002
88.	Muhammad Hanid son of Ghulam Farid	2.5.2006
89.	Abdullah Khan son of Abdul Majid	24.3.2005
90.	Muhammad Nazir son of Samar Gul	12.11.2004
91.	Waseem Khan son of Habib Khan	18.11.2004
92.	Aurangzeb son of Muhammad Sharif	16.4.2002
93.	Baseer Khan son of Muhammad Khan	30.11.2004
94.	Shahid Hussain son of Said Rehman	15.5.2002
95.	Naeem Jan of Sher Muhammad	13.5.2002
96.	Imtiaz Khan son of Mumtaz Khan	28.5.2002
97.	Kifayat Hussain son of Alta f Hussain	15.6.2002
98.	Muhammad Faisal son of Noor Bahadar	23.11.2002
99.	Ehsanullah son of Abdul Karim	17.5.2002
100.	Fazle Maula son of Firdaus Kphan	12.5.2002
101.	Arif ullah son of Raza Khan	9.4.2003
102.	Asif Khan son of Badshah Gul	24.11.2002
103.	Waqas Khan son of Khushdil Khan	11.5.2002
104.	Nihad Khan son of Hassan Khan	15.5.2002
✓ 105.	Muhammad Saleem son of Muqarab Khan	1.6.2002
106.	Faizur Rehman son of Azizur Rehman	25.11.2002
107.	Mukarram Hussain son of Muhammad Shafi	17.5.2002
108.	Mukarram Shah son of Mehrabuz Shah	24.5.2002
109.	Alan Zeb son of Mewa Khan	17.2006
	<u>SWEEPERS</u>	

		Date of arrival
110.	Hameedullah son of Aftab Gul	27.4.2002
111.	Nasir Khan son Dilawar Khan	6.12.2004
112.	Elizabeth Bibi wife of Jav ed Akhtar	6.4.2004
113.	Shehzad Masih son of Ahmad Masih	5.4.2003
114.	Amanuil son of Ayub Masih	24.4.2002
115.	Arshad Bhatti son of Sadiq Masih	31.8.2006
116.	Shahzad Nasir son of Nasir Masih	26.6.2006
117.	Shehryar Masih son of Mushtaq Masih	23.8.2003
118.	Abid Khan son of Falak Naz	1.10.2004
119.	Yousaf Khan son of Muhammad Rafiq	2.4.2004
120.	Muhammad Arif son of Hazrat Gul	29.5.2005
121.	Mubasher Khan son of Mughal Khan	9.3.2006
122.	Safdar Masih son of Kala Masih	6.4.2005
123.	Amjad Khan son of Muhammad Uzair	31.1.2006
124.	Saeed Shah son of Fazal Shah	10.4.2004
125.	Ayub Masih son of Ghulam Masih Bhatti	22.10.2004
126.	Asif Mehboob Masih son of Mehboob	14.6.2005
127.	Nawaz Khan son of Mumtaz Khan	17.1.2005
128.	Wajid Ali son of Muhammad Atlas Khan	1.9.2006
129.	Haji Akbar son of Ali Akbar	4.2.2006
130.	Amanuil Masih son of Daeel Masih	3.2.2006
131.	Niaz Muhammad son of Sher Muhammad	5.4.2003
132.	Victor David son of David Masih	18.7.2002
133.	Yaqoob son of Barkat Masih	18.7.2002
134.	Seema Bibi wife of Shingara Masih	24.4.2002
135.	Aashiq Masih son of Niamat Masih	5.4.2003
136.	Babar son of Siddique Masih	29.4.2002
137.	Asad John son of John Masih	29.8.2006
138.	Dfanyal Masih son of Gulzar Masih	18.7.2002
139.	Sarfraz Khan son of Abdul Wadood	21.8.2006
140.	Jamil son Denial Masih	29.4.2002

141.	Ejaz Masih son of Saddique Masih	24.4.2002
142.	Mushtaq Khan son of Abdul Rahim	23.8.2003
143.	Shabana wife of Amanullah	19.4.2006
144.	Waris Khan son of Abdul Ghani	13.7.2004
145.	Israr Ahmad son of Wahab Gul	10.11.2004
146.	Shahbaz Masih son of Ayub	
147.	Siraj Muhammad Son of Qadar Khan	
148.	Shakeel Masih son of Munshi Dil	27.4.2002
149.	Hamid Khan son of Ghulam Habib	27.4.2002
150.	Waseem Khan son of Maqbal Khan	28.2.2007
151.	Shazia wife of Munawar Lal	6.7.2006
152.	Faizullah son of Rehmat ullah	25.10.2005
153.	Aqeel Masih son of Denial Masih	11.1.2004
154.	Fakhre Alam son of Fazle Raziq	29.4.2002
155.	Shafiq Masih son of Taj Masih	14.9.2004
156.	Shakir ullah son of Shafiullah	22.4.2002
157.	Nari Maryam son of Yaqoob Masih	18.7.2005
158.	Ejaz Masih son of Wilson Masih	21.11.2006
159.	Rakan Masih son of Shafi Masih	18.7.2002
160.	Razia Bibi wife of Nadir Masih	24.4.2002
161.	Roofi Imtiaz son of Imtiaz Bakhshi	22.4.2002
162.	Adnan Masih son of Khushi Masih	12.5.2006
163.	Kamran Sabir son of Sabir Wazir	24.4.2002
164.	Shamim Bbibi wife of Liaqat Sadiq	6.1.2003
165.	Muhammad Saleem son of Muhammad Aslam Khan Sadozai	14.6.2005

Their appointment will be subject to the following terms and conditions.
 The employees selected for appointment shall with effect from the date of their continuous appointment shall be on regular basis in the institution.
 The employees shall for all intents and purposes be regular employees of the institution, except for the purpose of pension or gratuity.
 All the employees shall, in lieu of pension and gratuity, be entitled to the benefits of Contributory Provident Fund scheme in the prescribed manner.

NO. 10799-4 /L.R.H.
 Copy forwarded to:-

1. The Director Finance
2. The Deputy Medical Superintendent.(Admn)
3. The RMO.
4. All Zonal Deputy Medical Superintendent.
5. Sanitary Inspector
6. C.Head Class-IV

dated

Chief Executive
 Govt. Lady Reading Hospital Peshawar
 15/2007

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