

KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. 1075 /ST Dated 5/4 /2023

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

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


To:

The Associate Hospital Director
Lady Reading Hospital Peshawar

SUBJECT:- JUDGMENT IN SERVICE APPEAL NO. 77/2019, TITLED MUHAMMAD SALEEM VERSUS HEALTH DEPARTMENT

I am directed to forward herewith a certified copy of judgment dated 13.12.2022, passed by this Tribunal in the above mentioned appeal for strict compliance.

Encl. As above.


For (WASEEM AKHTAR)
REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL,
PESHAWAR.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No.77/2019

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

Muhammad Saleem, S/O Muqarab Khan R/O Class -IV Association Office
LRH, Peshawar.

... (Appellant)

VERSUS

The Government to Khyber Pakhtunkhwa through Secretary Health
Department, Peshawar and two others.

... (Respondents)

Ibrahim Khan Afridi
Advocate

... For appellant

Naseer Ud Din Shah
Assistant Advocate General

... For respondents

Mrs. Rozina Rehman
Miss Fareeha Paul

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

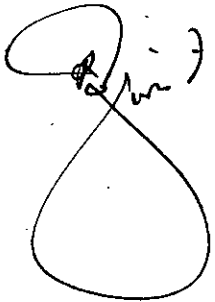
JUDGMENT

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

“On acceptance of the instant service appeal, the
impugned order dated 22.02.2018 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 is provincial civil
servant who was performing his duties in Leady Reading Hospital
Peshawar as ward orderly. His salary was withheld without any reason

SCANNED
KPST
Peshawar



and plausible explanation which was released vide order dated 22.02.2018, while respondents deducted salary of 127 days. He then submitted an application/departmental appeal on 05.04.2018 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 he was 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 the Constitution of Islamic Republic of Pakistan. That as per Article 25 of Constitution of Islamic Republic of Pakistan there shall 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.

5. Conversely, learned Assistant Advocate General submitted that the salary of the appellant was withheld due to non-performance of his duty. He submitted that appellant was transferred to the office of

Assistant Director (Legal) vide office order dated 09.10.2017 but he failed to join his duty, therefore, explanation was called but no response was tendered, therefore, show cause notice was issued for his long absence on 15.01.2018 but he failed to submit any reply. He resumed his duty on 10.01.2018. In consequence respondent No. 2 issued letter dated 22.02.2018 vide which salary for the period of absence from duty i.e 127 days was ordered to be deducted. Lastly, he submitted that there was no discrimination and that appellant was treated in accordance with law and procedure.

6. From the record it is evident that the appellant was provincial civil servant who was performing his duties in Leady Reading Hospital Peshawar as ward orderly. Allegations against the present appellant are that he remained absent for 127 days, therefore, salary for the said period was ordered to be deducted and after fulfillment of all requirements his salary was released which had already been stopped. Record shows that the respondents blatantly violated the set norms and rules and conducted the proceedings in an authoritarian manner. No proper procedure as envisaged in E&D Rules, 2011 was followed. No charge sheet alongwith statement of allegations was issued to the appellant. No proper inquiry was conducted in order to bring on record the absence of the appellant without the permission of the competent authority. It is astonishing as to why the department kept mum for a long period of 127 days without initiating proper proceedings against the appellant. Absence for 127 days was not proved through cogent evidence. The appellant was discriminated which is evident from the

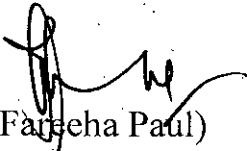



record that one Muhammad Waris, ward orderly was also charged for 43 days of absence and his salary was accordingly deducted. Reportedly he filed service appeal which was later on withdrawn because his salary for the said period was refunded vide office order dated 18.01.2019. No cogent reason was shown as to why the appellant was discriminated and why 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


(Farzeha 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 of this Tribunal place on file, instant service appeal is accepted as prayed for.

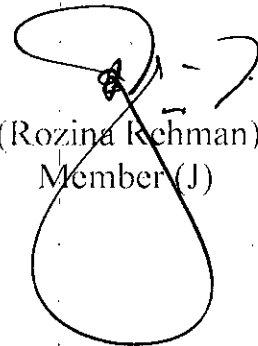
Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

13.12.2022



(Fareeha Patil)
Member (I)



(Rozina Kechman)
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.



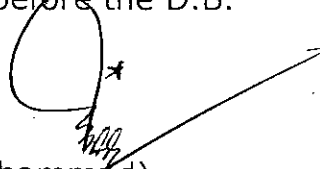
(Salah-Ud-Din)
Member (J)



(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.

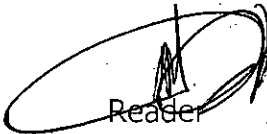
Former requests for adjournment due to engagement of learned senior counsel for the appellant before the Honourable High Court today. Request accorded. Case to come up for arguments on 15.02.2022 before the D.B.


(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

Appellant in person present.

Muhammad Rasheed learned Deputy District Attorney alongwith Sabira Naz Qureshi Legal Officer for respondents present.

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


(Fareeha Paul)
Member(E)


(Rozina Rehman)
Member (J)

11.03.2021

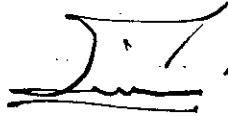
Due to non availability of Bench, the case is adjourned to 14.06.2021 for arguments before D.B


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.

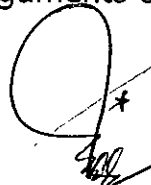

(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(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

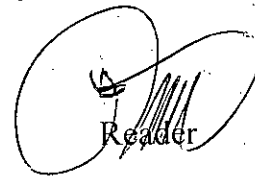
15.04.2020

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

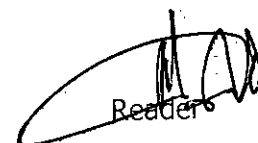
Due to incomplete Bench, the case is adjourned. To come up for the same on 18.12.2020 before D.B.


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.

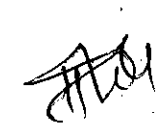

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

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 77/19

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 17.10.2019 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 Muhammad Saleem 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 127 days salary of the appellant vide order dated 22.02.2018 without any reason. It was further contended that the appellant filed departmental appeal on 15.03.2018 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 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

Appellant alongwith his counsel 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 22.02.2018 of the Associate Hospital Director Lady Reading Hospital MTI Peshawar regarding deduction of 127 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

04:04.2019

None for the petitioner 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)

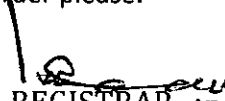

Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 77/2019

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. Muhammad Salem 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> 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> CHAIRMAN</p>

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

Service Appeal No: 77 /2019

Muhammad Saleem

Verses

Government of KPK and others

INDEX

S.No	Description	Annexure	Page No.
1	Appeal		1 - 4
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4.	Copy of impugn order & Pay roll	"B"	9-17
5.	Copy of application/department appeals	"C"	18
6.	Copy of biometric attendance	"E"	19-24
7.	Wakalatnama.		25

Appellants
(m. saleem) *[Signature]* HCCC -

Dated: 14-01-2019

Through

[Signature]
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.**

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No 77 /2019

Diary No. 76

Dated 17-1-2019

Muhammad Saleem S/O Muqarab Khan R/O Class-IV
Association Office LRH Peshawar

(Appellant)

VERSUS

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. 1034/AHD/PA/LRH,
DATED 22/02/2018. WHEREBY THE APPELLANT'S 127
DAYS SALARY 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 1034/AHD/PA/LRH, dated 22-02-2018 may please be set aside / turn down and the deducted salary of the appellants may kindly be reimbursed back to the appellants.

2

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 no. 1 is as orderly ward duties. (Copy of the service cards of the appellant is attached as 'A')
2. That the respondent no. 2 withheld the salary of the appellant and then with his own sweet will released the under order, ref no. 1034/AHD/PA/LRH on dated 22-02-2018, while deducted 127 days of salary and consequently the same started deducting monthly from his pay roll. (Copy of impugn order & Pay roll is attached as 'B')
3. That consequently on dated 05-04-2018 the appellant duly submitted an application/departmental appeal for initiating departmental inquiry regarding the deduction of their salary. (Copy of applications/department appeal attached as annexure 'C')
4. That during all this time, for which the salary of the appellant is deducted, he is in full attendance and no reason for the deduction of pay has ever been given to the appellant. (Copy of biometric attendance attached as 'D')
5. That feeling aggrieved by the impugn order as mentioned in the heading of this appeal, against which departmental appeals were filed by the appellants but till date no plausible explanation or order has been made, hence the instant appeal on the following grounds amongst others:

•
• GROUNDS:

③

- A. The illegal and malafide act of the respondent no. 2, loudly speaks that he treats the petitioner 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 appellants have 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 be 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.
- D. That respondent no. 2 has not treated the appellants 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.

4

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 appellants may kindly be reimbursed.

Amir HCC
Appellant

Dated: 14.01.2019

Through

Mufarq Shah
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

5

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

Service Appeal No _____/2019

Muhammad Saleem

(Appellant)

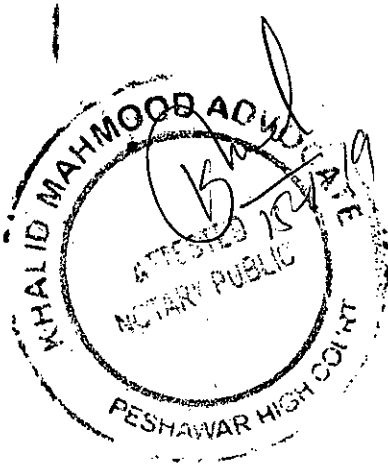
VERSUS

Government of KPK and Others

(Respondents)

Affidavit

I, Muhammad Saleem S/O Muqarab Khan R/O Class-IV Association Office LRH 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.



[Handwritten Signature]

DEPONENT

CNIC NO: 13101-6939835-1



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/ ⁹ 034 /AHD/PA/LRH

Dated: 22/02/2018

To,

The Hospital Director
Lady Reading Hospital, MTI
Peshawar

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

It is for your information that the requirements are fulfilled by Mr. Muhammad Saleem S/O Muqarab Khan Ward Orderly has given his arrival report.

Therefore, his salary may please be released after deduction of 127 days.

Sd/-

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar
Dated: 22/02/2018

No. ¹⁰³⁵⁻¹⁰⁴⁰ /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
release his salary after deduction of 127 days.
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

mu72

10

Lady Reading Hospital Peshawar

777-01-000062

March, 2018

MUHAMMAD SAJJAM
Ward Orderly

Birth 15 APR 1978

DD05 N.T

STATEMENT

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	1503.00
154 Ad-hoc Rel. Allow. (2013)	392.00
163 Ad-hoc Rel. Allow. (2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec

335 CP Fund

381 Benevolent Fund

QUALIFYING SERVICE

12 YRS 9 MON

TOTAL 25,995

*** 717 8,000.00 ✓

Balance 414.00

1730116939835

600.00

TOTAL *** 9014

NET AMOUNT PAYABLE 16,981

BANK MCB
BRANCH 0958 LRH
ACCOUNT 0095802010036954

نوٹ: تمام میں غلطی کی صورت میں اہل کام کے اندر کماؤت نکاشن سے راہدہ کریں!

صورت دیگر تو اور دست نامہ کی جانچنی
جی پی ٹی کی معلومات اے جی افس سے کریں

Attested

Handwritten signature

Lady Reading Hospital

April, 2016

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

Birth 15 APR 1978

BPS 05 N.T.H

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	1503.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS & RECOVERIES

TOTAL ***
 Balance 25,995

324 Trade & Prof Tax.	100.00
334 XLVI Misc./Rec.	8000.00
335 CP Fund	414.00
361 Benevolent Fund	600.00
500 Adj. LRA Other Deduction	873.00

QUALIFYING SERVICE

12 YRS 20MON

TOTAL *** 2,887.00
 NET AMOUNT PAYABLE 16,008

BANK A.C.B
 BRANCH
 ACCOUNT 0095802010036954

Attested
[Signature]

11

Lady Reading Hospital

May, 2019

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS 05 N.T.N

PAYMENTS

001 Substantive Pay	17260.00
121 Conveyance Allowance	1932.00
134 House Allowance	1503.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
175 Medical Allowance	1500.00

(12)

DEDUCTIONS & RECOVERIES

334 XLVI Misc./Rec	8000.00
335 CP Fund	414.00
381 Benevolent Fund	600.00

TOTAL ** 25,995

Balance 8977 53424

TOTAL ** 2,813.00
 NET AMOUNT PAYABLE 16,981

QUALIFYING SERVICE

12 YRS 11MOS

BANK NOB
 BRANC 100158
 ACCOUNT NO. 0010036954

Attested
 [Signature]

Lady Reading Hospital

June, 2018

13

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

Birth 15 APR 1978

BP305 N.T.N

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	1503.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS & DISBURSEMENTS

TOTAL PAYABLE 25,995

Balance 75707

334 XLVI (Rel. / Res.) 8000.00

335 CP Fund 414.00

381 Benevolent Fund 600.00

TOTAL PAYABLE 25,019.00

NET AMOUNT PAYABLE 16,981

QUALIFYING SERVICE
 13 YRS 6 MON

BANK MOB
 BRANC 0256 LKH

Attested
[Signature]

Lady Reading Hospital

July, 2018

19

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

Birth 15 APR 1978

BP505 N.T.N

PAYMENTS -

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	2254.00
154 Ad-hoc Rel. Allow.(2013)	392.00
162 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
167 Ad-hoc Allowance (2018)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

TOTAL **
 Balance 28,472

334 XLVI Disc./Rec

335 CP Fund	1780116336835	6777	8000.00
381 Benevolent Fund		30252	414.00
			600.00

QUALIFYING SERVICE

12 YRS 1MON

TOTAL ***
 NET AMOUNT PAYABLE 19,458

Attested
 [Signature]

C BANK MCB
 BRANCH
 ACCOUNT 0095802010036954

Lady Reading Hospital

August, 2018

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

Birth 15 APR 1978

BPS05 N.P.N

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	2254.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
167 Ad-hoc Allowance (2018)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec	59717	8000.00
335 CP Fund	1730116939835	34666
381 Benevolent Fund		414.00
		600.00

TOTAL ***
 Balance

28,472

TOTAL ***

9,014.00

NET AMOUNT PAYABLE

19,458

QUALIFYING SERVICE
 13 YRS 2MON

BANK MCB
 BRANC 0958 LRH
 ACCOUNT 0095802010036954

ذات: 15 اپریل 2018ء کو جاری کی گئی ہے اور اس کی تصدیق کی جا رہی ہے۔
 یہ رقم مقررہ طور پر منظور کی جائے گی۔

Attested
 [Signature]

15

Lady Reading Hospital

September, 2018

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.N

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	2254.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
167 Ad-hoc Allowance (2018)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.

335 CP Fund 1730116939835

381 Benevolent Fund

TOTAL ***
 Balance 28,472

51717 8000.00

35080 414.00

600.00

TOTAL *** 9,014.00

NET AMOUNT PAYABLE 19,458

QUALIFYING SERVICE
 13 YRS 3MON

BANK MCB
 BRANC 0958 LRH
 ACCOUNT 0095802010036954

Attested

Handwritten signature

نوٹ: گورنمنٹ ہسپتال کی صورت میں ملازمین کے لئے ایئر ٹکٹ کی رقموں سے منسوب کیے گئے ہیں۔
 یہ رقمیں گورنمنٹ ہسپتال کے اکاؤنٹ سے منسوب کی جائیں گی۔

16

Lady Reading Hospital

October, 2018

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS 05 N.T.N

PAYMENTS

001 Substantive Pay		17260.00
131 Conveyance Allowance		1932.00
134 House Allowance		2254.00
154 Ad-hoc Rel. Allow.(2013)		392.00
163 Ad-hoc Rel. Allow.(2015)		277.00
164 Ad-hoc Allowance (2016)		1405.00
166 Ad-hoc Allowance (2017)		1726.00
167 Ad-hoc Allowance (2018)		1726.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		43717	8000.00
335 CP Fund	1730116939835	35494	414.00
381 Benevolent Fund			600.00

QUALIFYING SERVICE

13 YRS 4MON

TOTAL ***

NET AMOUNT PAYABLE 19,458

BANK MCB
 BRANC 0958 LRH
 ACCOUNT 0095802010036954

نوٹ: حکومتی ملازمین کی سروس میں اضافے کے لیے ان کے حقوق کا جائزہ لیا گیا ہے۔
 یہ رقم ان کے حسابوں پر جمع کی جائے گی۔

Attested

(Handwritten Signature)

17

خدمت منڈیا ہاسپل ڈائریکٹری لڈی (ریڈنگ ہسپتال ایم۔ ٹی۔ آئی۔ ایم)

منڈیا ہاسپل!

خوان برائے 127 دنوں کی نمونہ

میں سے لٹوٹی کے احکامات منسوخ کیے

منڈیا ہاسپل کے سائبر فو اسٹ میں ہے

کہ آپ منڈیا ہاسپل کی جانب سے مورخہ 2/18 جو 1035-1040

مراسلہ میں سائل سے 127 دن لٹوٹی کا ذکر ہے۔

لہذا آپ منڈیا ہاسپل سے عاجزانہ اپیل ہے

کہ سائل نے اپنی ڈیوٹی عموماً اسٹوٹی سے سر انجام دیا ہے سائل

کریب خاندان سے تعلق رکھتا ہے اور سائل کے چھوٹے بھوتے بچے

ہیں اور آئندہ لڈی میں اپنی ڈیوٹی اعداد و ارس سے جاری رکھے

کا امداد آپ منڈیا ہاسپل کو کہیں بھی کسی شکایت کا موقع پیدا دے گا

سائل کے حال پر اس قسم فرمائے ہوئے 127

دن میں لٹوٹی نہ کی جائے سائل آپکا سب شکریہ گزار رہا ہے۔

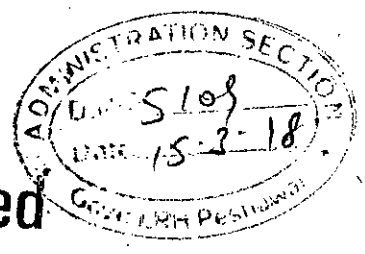
عین نو ارس ہوئی

الحماد بن احماد لہدار نام محمد سلیم

پوسٹ وارڈ ارسل

ڈیوٹی چلانا (میں)

Attested



19

Lady Reading Hospital, MTI Peshawar

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



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

ATTENDANCE SHEET_MONTH_WISE

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

Code	Name	Designation	Duty Date																												Perform		
			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
60000002644	MUHAMMAD SALEEM	Ward Orderly	07:52 16:43	08:04 15:34	08:04 15:34	08:16 15:54	07:51 16:26	08:04 15:32	08:11 16:14	08:04 15:04	08:06 16:28	07:38 16:06									07:21 16:48	08:03 15:32	08:15 16:17	08:14 15:51	08:11 17:25	08:27 16:28						121:44 229:30	
Section Wise Total :			1																														
Department Wise Total :			1																														
Grand Total :			1																														

Attested
[Signature]

20

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																									Perform				
			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
60000000145	MUHAMMAD WARIS	Ward Orderly	08:57	08:30	08:15	08:00	07:45	08:03	07:28	08:33	07:17	07:09	07:34		06:59	07:26	08:17	08:12	09:53	08:07		07:14	07:28	08:01	07:13	07:09			07:25	07:30	07:49	248:11
			17:45	17:29	16:40	13:23	08:03	07:28	19:29	07:17	20:17	07:34		06:59	07:26	19:58	17:32	20:24	08:07			19:36	07:29	17:24	07:13	07:09			18:37	07:30	07:49	212:30
Section Wise Total :																																
Department Wise Total :																																
Grand Total :																																

Attested

[Handwritten Signature]

20

Lady Reading Hospital, MTI Peshawar

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



From Date: 26-NOV-17

To Date : 25-DEC-17

ATTENDANCE_SHEET_MONTH_WISE

Department: Facilities Management-LRH

Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																												Perform	
			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
60000302644	MUHAMMAD SALEEM	Ward Orderly	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
								G				08:32	08:28	08:14	08:08			08:35	08:13	08:24	08:11	08:26			08:40	08:30	08:14	08:21	08:11	07:38		
												16:13	16:01	15:38	15:58			15:58	16:18	17:04	17:12	15:46				16:35	15:59	15:58	15:36	19:34	18:10	G
Section Wise Total :																															209:36	
Department Wise Total :																															195:30	
Grand Total :																																

Attested
[Signature]

22

Lady Reading Hospital, MTI Peshawar

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



From Date: 26-DEC-17

To Date : 25-JAN-18

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

ATTENDANCE_SHEET_MONTH_WISE

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	25
60000002644	MUHAMMAD SALEEM	Ward Orderly	09:01 19:42	08:09 18:54	08:12 16:31	08:20 15:58			08:36 16:23	08:36 16:16	08:23 16:42	08:02 15:45	08:50 17:01			08:30 16:56	08:07 16:56	08:29 16:25	08:18 15:26	08:17 15:48			08:26 16:29	08:21 16:38	08:03 16:38	08:27 16:04	08:14 16:04			08:29 16:40	08:37 16:34	08:27 16:03	08:04 15:38	518:12 229:30
Section Wise Total :																												1						
Department Wise Total :																												1						
Grand Total :																												1						

Attested
[Signature]

22



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	25						
			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							
60000002644	MUHAMMAD SALEEM	Ward Orderly	08:43 16:49			08:17 16:01	08:25 15:11	08:25 16:07	08:28 17:28	08:13 08:13			G	08:42 17:53	08:13 16:15	08:36 16:57	08:29 16:43			08:22 16:10													08:06 19:02	08:10 17:46	08:01 16:13	08:04 16:17		08:14 14:46	08:09 14:17	388:25 212:30

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

Attested
[Signature]

32

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-FEB-18

To Date : 25-MAR-18

Department: Facilities Management-LRH

Section: Facilities Management-LRH

Code	Name	Designation	Duty Date																									Perform									
			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							
60000002644	MUHAMMAD SALEEM	Ward Orderly	07:58	08:01			SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL								
			14:58	15:10																		08:13	08:13	SL	SL	SL	CL	CL	CL	G							
																																				14:10	42:30

Section Wise Total : 1

Department Wise Total : 1

Grand Total : 1

Attested
[Signature]

25

بعد الت

Before The Honorable Services
Tribunal, KPK, Peshawar

2 جناب

محمد سلیم بنام گورنمنٹ آف کپک وٹری

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی و جواب دہی وکل کاروائی متعلقہ
آن مقام لیسٹاور کیلئے صغریٰ سٹاہ ایڈووکیٹ
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریبات و فیصلہ برحلف دینے جواب دہی اراقبال دعویٰ اور
بسورت ڈگری کرنے اجراء اور صوبی جہاد و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیردی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیردی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بنائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیردی
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سدر ہے۔

المرقوم 14 ماہ جنوری 2019

واہ العب

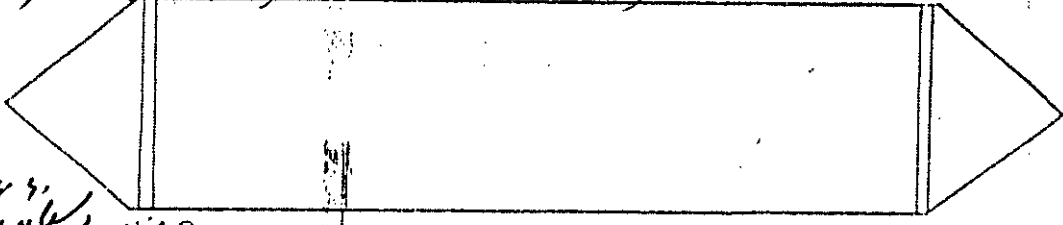
کے لئے منظور ہے۔

بمقام لیسٹاور

Accepted
mufr

محمد سلیم ولد صغریٰ فان سٹاہ

بجالت سرورین رٹریونل - جیٹو فوٹو ایسٹور



جناب ریسائیٹور
گورنمنٹ ہسپتال

محمد سلیم

بنام

سرورین رٹریونل

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
دکیل صاحب کو راضی نامہ کرنے و تقرر رسالت فیصلہ برحلاف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء آدرصولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائس پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظربانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی 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
پرداختہ مندرجہ اور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جہانہ التوا سے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا جد سے باہر ہو تو دکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

المرقوم 21 ماہ 2019

واحد
Oplead

Oplead

بیسوا
Oplead

HOSPITAL DIRECTOR
Lady Reading Hospital-MTI
...Peshawar...

Submitted
21/05/02

~~Salim Khan Jadoon
Sale, Peshawar~~

8

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

OFFICE ORDER

In pursuance of Govt. of NWFP Health Department No SO(ME)H-I/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.

Nr. 10820-23

/LRH

Copy for information to the:

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

Medical Superintendent
Govt. Lady Reading Hospital,
Peshawar

Dated 11/5/2002

Govt. LRH, Peshawar.

Govt. LRH, Peshawar

Govt. LRH, Peshawar

Medical Superintendent
Govt. Lady Reading Hospital,
Peshawar

opi

o/o
M. Sabir/R

Before The Hon'ble Services Tribunal, Peshawar Kpk

Muhammad Saleem _____ Appellant

VERSUS

Director Health & others _____ Respondants

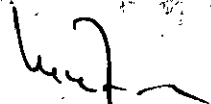
Application for Extending of hearing

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.

Date 19-08-2019

Appellant
Through 
Muftariq Shah
Advocate

یچترالٹ سروس ٹرسٹریٹ

Service Appeal No. 7719

LRH/R.

بنام حکومت و غیرہ

خدمت

موزخه
مقدمه
دعوی
جرم

باعث تخریب آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہات ہی وکل کاروائی متعلقہ
آن مقام ~~کیلئے~~ ~~بیسٹریٹ~~ ~~الہ~~ ~~ظفر~~ ~~فریدی~~
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 مالت فیصلہ برحلاف دیئے جو اب وہی اور اقبال دعوی اور
بصورت ڈگری کرنے اجراء اور سولی چیک دروپہ ارضی دعوی اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار دیا گیا۔ نیز بصورت عدم بیرونی یا ڈگری پیکٹرفہ یا اپیل کی براندگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظریاتی و بیرونی کرنے کا اختیار دیا گیا۔ 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
دیا گیا۔ اور صاحب مقرر شدہ کو کسی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سامنے
پر داخستہ مناد و قریب ہونگا۔ دوران مقدمہ میں جو نوٹر چیدہ ہر بیانات التوائے مقدمہ کے سبب سے وہ ہونگا۔
کوئی تاریخ پیشی مقام دورہ پر وہ یا حد سے باہر ہونو وکیل صاحب پابند ہوں گے۔ کہ بیرونی
ملہ کوڈ کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم 13 ماہ صوری 20 20

کے لئے منظور ہے۔

[Signature]

بنام

[Signature]

BE No 17-7838-

No No-310-546000-

HOSPITAL DIRECTOR
Lady Reading Hospital-MTI
...Peshawar...

BEFORE THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.77/2019

Muhammad Saleem

.....*Petitioner*

Versus

Government of Khyber Pakhtunkhwa & Others

.....*Respondents*

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 ward orderly.
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.1035-1040/AHD/PA/LRH dated 20.02.2018 wherein the salary for the period of absence from duty i.e. seventy-one (127) days.

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

3. **Completely incorrect.** The application mentioned in the plaint is misleading. The application annexed is dated 15.03.2018 whereas the application mentioned in the para is said to be dated 05.04.2018.

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.** The Appellant has failed to justify his absence.

d) **Grossly incorrect, hence, denied.** Detailed explanation is provided in Para "2".

e) **Grossly incorrect, hence, denied.** As explained in Para "b". Article 25 of the Constitution of Pakistan, 1973 (hereinafter referred to as "**Constitution**") provides for the equality of citizens.

f) **Grossly incorrect, hence, denied.** Detailed explanation is provided in Para "2". The Appellant has failed to justify his absence and procedure which applies equally to all. The Respondents have in no way, shape or form "abrogated" the Constitution.

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

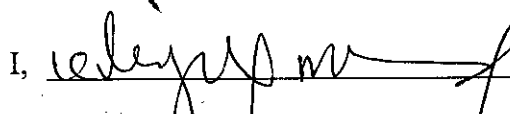
Through


Barrister Ibrahim Khan Afridi
Advocate High Court(s)

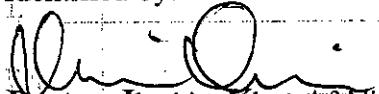
Legal Advisor
Lady Reading Hospital

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

AFFIDAVIT

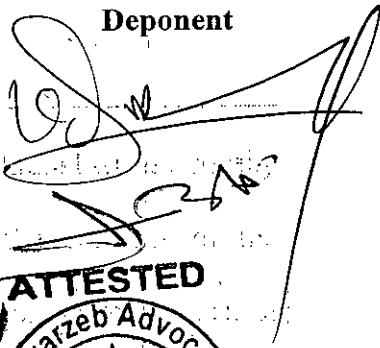
I,  S/o Major Effien
R/o W.H., Khyber Pakhtunkhwa do hereby
solemnly declare and affirm on oath that the contents of the
accompanied Written Statement are true and correct to the best of
my knowledge and belief and nothing material has been concealed
therein.

Identified by:

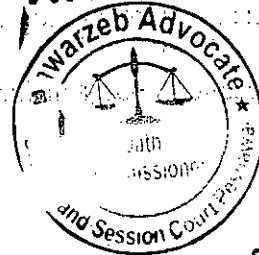

Barrister Ibrahim Khan Afridi
Advocate High Court(s)

Legal Advisor
Lady Reading Hospital

Deponent



ATTESTED



24-2-2020



9

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/ 934/AHD/PA/LRH

Dated: 22/02/2018

To:

The Hospital Director
Lady Reading Hospital, MTI
Peshawar

Subject: RELEASE OF SALARY OF CLASS-IV

It is for your information that the requirements are fulfilled by Mr. Muhammad Saleem S/O Muqarab Khan Ward Orderly has given his arrival report.

Therefore, his salary may please be released after deduction of 127 days.

-----Sd-----

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar
Dated: 22/02/2018

No. 1035-1040
/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
release his salary after deduction of 127 days.
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

Lady Reading Hospital

March, 2018

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.N

PAYMENTS

001 Substantive Pay		17260.00
131 Conveyance Allowance		1932.00
134 House Allowance		1503.00
154 Ad-hoc Rel. Allow.(2013)		392.00
163 Ad-hoc Rel. Allow.(2015)		277.00
164 Ad-hoc Allowance (2016)		1405.00
166 Ad-hoc Allowance (2017)		1726.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		98717	8000.00
335 CP Fund	1720116329835	32596	414.00
381 Benevolent Fund			600.00

TOTAL *** Balance 25,995

TOTAL *** 9,014.00

NET AMOUNT PAYABLE 16,981

QUALIFYING SERVICE
 12 YRS 9MON

BANK MCB
 BRANC 0058 LRH
 ACCOUNT 0095802010036954

Lady Reading Hospital

April, 2018

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.N

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	1503.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

TOTAL *** 25,995

324 Trade & Prof. Tax.		100.00
334 XLVI Misc./Rec.	81717	8000.00 ✓
335 CP Fund	1720116839825 33010	414.00
381 Benevolent Fund		600.00
500 Adj. LRH Other Deduction		873.00

TOTAL *** 9,987.00

NET AMOUNT PAYABLE 16,008

QUALIFYING SERVICE
 12 YRS 10MON

BANK MCB
 BRANC 0858 LRH
 ACCOUNT 0095802010036954

Lady Reading Hospital

May, 2018

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.N

PAYMENTS

001 Substantive Pay		17260.00
131 Conveyance Allowance		1932.00
134 House Allowance		1503.00
154 Ad-hoc Rel. Allow.(2013)		392.00
163 Ad-hoc Rel. Allow.(2015)		277.00
164 Ad-hoc Allowance (2016)		1405.00
166 Ad-hoc Allowance (2017)		1726.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		83717	8000.00
335 CP Fund	1730118999835	33424	414.00
381 Benevolent Fund			600.00

TOTAL *** 25,995

Balance 83717

TOTAL *** 9,014.00

NET AMOUNT PAYABLE 16,981

QUALIFYING SERVICE

12 YRS 11MON

BANK MCB
 BRANC 0958 LRH
 ACCOUNT 0095802010036954

Lady Reading Hospital

June, 2018

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.M

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	1503.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.	75717	8000.00
335 CP Fund	1730116939825	33838
381 Benevolent Fund		600.00

TOTAL *** 25,995

Balance

TOTAL *** 9,014.00
 NET AMOUNT PAYABLE 16,981

QUALIFYING SERVICE
 13 YRS 0MON

BANK MCB
 BRANC 0858 LRH
 ACCOUNT 0095802010036954

Lady Reading Hospital

July, 2018

Birth 15 APR 1976

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.N

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	2254.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
167 Ad-hoc Allowance (2018)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.	67717	8000.00
335 CP Fund	1730116929825	414.00
381 Benevolent Fund		600.00

TOTAL *** 28,472

Balance

TOTAL *** 9,014.00
 NET AMOUNT PAYABLE 19,458

QUALIFYING SERVICE
 13 YRS 1MON

BANK MCB
 BRANC 0858 LRH
 ACCOUNT 0095802010036954

Lady Reading Hospital

August, 2018

Birth 15 APR 1978

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.N

PAYMENTS

001 Substantive Pay	17260.00
131 Conveyance Allowance	1932.00
134 House Allowance	2254.00
154 Ad-hoc Rel. Allow.(2013)	392.00
163 Ad-hoc Rel. Allow.(2015)	277.00
164 Ad-hoc Allowance (2016)	1405.00
166 Ad-hoc Allowance (2017)	1726.00
167 Ad-hoc Allowance (2018)	1726.00
175 Medical Allowance	1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.		59717	8000.00
335 CP Fund	1720116922635	34866	414.00
381 Benevolent Fund			600.00

TOTAL *** 28,472

Balance

TOTAL *** 9,014.00

NET AMOUNT PAYABLE 19,458

QUALIFYING SERVICE
 13 YRS 2MON

BANK MCB
 BRANC 0858 LRH
 ACCOUNT 0095802010036954

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Lady Reading Hospital

September, 2018

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

Birth 15 APR 1978

BPS05 N.T.N

PAYMENTS

001 Substantive Pay		17260.00
131 Conveyance Allowance		1932.00
134 House Allowance		2254.00
154 Ad-hoc Rel. Allow.(2013)		392.00
163 Ad-hoc Rel. Allow.(2015)		277.00
164 Ad-hoc Allowance (2016)		1405.00
166 Ad-hoc Allowance (2017)		1726.00
167 Ad-hoc Allowance (2018)		1726.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

334 XLVI Misc./Rec.			TOTAL ***	28,472
335 CP Fund		51717	Balance	
381 Benevolent Fund		35060		8000.00 ✓
	1790116929925			414.00
				600.00

QUALIFYING SERVICE

13 YRS 3MON

TOTAL *** 9,014.00
 NET AMOUNT PAYABLE 19,458

BANK MCD
 BRANC 0958 LRH
 ACCOUNT 0095802010036954

Lady Reading Hospital

October, 2018

Birth 15 APR 1976

777-01-000062
 MUHAMMAD SALIM
 Ward Orderly

BPS05 N.T.N

PAYMENTS

001 Substantive Pay		17260.00
131 Conveyance Allowance		1932.00
134 House Allowance		2254.00
154 Ad-hoc Rel. Allow.(2013)		392.00
163 Ad-hoc Rel. Allow.(2015)		277.00
164 Ad-hoc Allowance (2016)		1405.00
166 Ad-hoc Allowance (2017)		1726.00
167 Ad-hoc Allowance (2018)		1726.00
175 Medical Allowance		1500.00

DEDUCTIONS/RECOVERIES

TOTAL *** 28,472

Balance

334 XLVI Misc./Rec.		43717	8000.00 ✓
335 CP Fund	1730116929835	35494	414.00
381 Benevolent Fund			600.00

TOTAL *** 9,014.00

NET AMOUNT PAYABLE 19,458

QUALIFYING SERVICE

13 YRS 4MON

BANK MCB
 BRANC 0858 LPH
 ACCOUNT 0095802010036954

87
86



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: 1541 /AHD/PA/LRH

Dated: 29/04/2018

To

Mr. Saleem S/O Mukarab Khan, Ward orderly
Lady Reading Hospital, MTI,
Peshawar.

Subject: EXPLANATION

It has come to the notice if undersigned that you illegally gathered in the hospital premises and conducted illegal general body meeting on 11.04.2018, which is against the rules and regulation.

You are directed to explain your position within three (03) days otherwise strict disciplinary action will be taken against you.

-----Sd-----

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

Dated: 29/04/2018

No. 1548-1547 /AHD/PA/LRH

Copy forwarded to:-

1. Hospital Director
2. Director Finance
with the request to stop his salary until settlement of this issue
3. Director Human Recourse
4. Secretary BoG
5. P.A 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

Put in P/Files

888



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: 1825 /AHD/PA/LRH

Dated: 30/05/2018

To

Mr. Muhammad Saleem S/O Mukarab Khan, Ward Orderly
Lady Reading Hospital, MTI,
Peshawar.

Subject: WARNING

File no
244

Reference to letter No. 154/AHD/PA/LRH dated 29.04.2018.

Your reply to the explanation is not satisfactory you are hereby strictly warned to be careful in future and avoid such illegal gathering/activities.

-----Sd-----

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

Dated: 30/05/2018

No. 1826-1832 /AHD/PA/LRH

Copy forwarded to:-

1. Hospital Director
2. Director Human Resource
3. Director Finance
4. Secretary BoG
5. P.A to Associate Hospital Director
6. Dealing Assistant Class-IV
7. Personal File

- LRH, MTI, Peshawar
- LRH, MTI, Peshawar
- LRH, MTI, Peshawar
- With the request to release salary of Mr. Muhammad Saleem S/O Mukarab Khan Ward orderly
- LRH, MTI, Peshawar
- LRH, MTI, Peshawar
- LRH, MTI, Peshawar

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

30/05/18

85 (2)

مکتوب سے جناب AHD عہدہ ایچ۔ ڈی۔ آئی گورنمنٹ ایڈمیڈیٹڈ ہسپتال کے۔

شکوہی درخواست برائے لوکل اکیڈمی اور جوہلہ جوہاں طلبی مراسلہ نمبر 1541/AHD/PA/LR.H جناب ای۔ اے۔

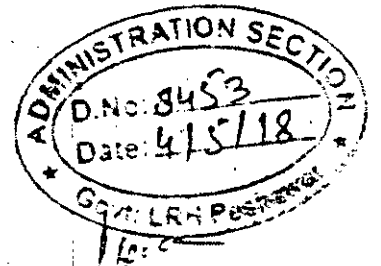
خود بانہ گزارش کی جاتی ہے کہ سائل کو مراسلہ نمبر 1541/AHD/PA/LR.H وصول ہوا ہے۔

جو کہ سائل اپنی ڈیوٹی کے فرائض صفا طریقے سے ادا کرتا ہے۔ کسی بھی غیر قانونی سرگرمیوں میں ملوث نہیں ہوں۔ سائل مجلس فور ملرز میں غیر دستور کا صوبائی عہدہ برقرار ہے۔ جو کہ اپنی ڈیوٹی کے ساتھ قانون کی مطابق غیر ایچ ایم ڈی کے حقوق کے حصول کے لئے آواز اٹھانا نہیں چاہتا۔ سائل فور ملرز میں کے جائز سائل و مطالبات حقوق کے حصول کے لئے آواز اٹھانا نہیں چاہتا۔ سائل فور ملرز میں کے جائز حقوق کے حصول کے لئے آواز اٹھانا نہیں چاہتا۔ سائل فور ملرز میں کے جائز حقوق کے حصول کے لئے آواز اٹھانا نہیں چاہتا۔

لہذا آپ صاحبان کی خدمت میں عرض کی جاتی ہے کہ آپ صاحبان کی قلم کے ذریعہ یہ مجلس فور ملرز میں L.R.H کے جو جائز مطالبات میں انکوشل کرنے مجلس فور ملرز میں کی بڑھتی ہوئی بے چینی ختم اور یہی خدشہ کی بھی کارروائی کو ایسا اور متنوعوں میں کی بھی کٹوتی والی رہنمائی کے لئے اسکا مات جاری کرنے کے لئے درخواستیں جمع کرائیں۔

امرواح

الکاح



عین نوادس ہوجے

صدر ایچ ایم ڈی

آئی کے اے ایچ ایم ڈی ولد مقرب وارڈ اول گورنمنٹ ایڈمیڈیٹڈ ہسپتال کے۔

عدالت منیب ہاسپٹل ڈائریکٹر لڈی (ریڈنگ ہسپتال ایم۔ بی۔ سی۔ ای)

منیب والی!

خواجہ برائے 127 دنوں کی تعداد
میر سے لڈی کے احکامات منسوخ کیے گئے

منیب اسٹیم کے ساتھ درخواست پیش ہے

کہ آپ مادیان کی جانب سے مورخہ 2/18 جو 1045-1035

مراسلہ پر مسائل سے 127 دن لڈی کا ذکر ہے۔

لہذا آپ مادیان سے عاجزانہ اپیل ہے

کہ مسائل نے اپنی ڈیوٹی خوش اسلوبی سے انجام دینے کے مسائل

مکریب خاندان سے کھلاؤ رکھنا ہے اور مسائل کے چھوٹے چھوٹے

پیس اور آفندہ لکھتے ہیں اپنی ڈیوٹی (بملازمت) سے جاری رکھے

گا اعد آپ مادیان کہ کبھی کبھی مسائل کو موقع پیدا دے گا

مسائل کے حال پر ہم غم خیز ہائے 127

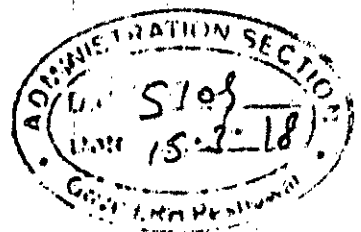
دن میں لڈی (منیب) کے مسائل آکھیا سب بند کرنا ہوگا۔

عبدالواہد شہزاد

الرحمان رضا ادویا لمدار ناک محمد سلیم

پوسٹ وارڈ (ارڈر)

ڈیوٹی (لڈی)





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: 666/AHD/PA/LRH

Dated: 20/12/2017

To

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. 667/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

OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

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

Ref No.

/AHD/PA/LRH

Dated

11/11/2017

- To
1. Mr. Ghulam Hussain S/O Ghulam Sarwar, ^{Cook} ~~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, ^{Cook} ~~Ward Orderly~~, 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, MTP Peshawar

Dated 10/11/2017

No. 321
/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

LRH, MTP, Peshawar
LRH, MTP, Peshawar
LRH, MTP, Peshawar
LRH, MTP, Peshawar

~~HOSPITAL DIRECTOR~~
Lady Reading Hospital, MTP Peshawar

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTP Peshawar



OFFICE OF THE ASSOCIATE HOSPITAL DIRECTOR

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. 12417/29 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 to why you are not obeying internal transfer orders, otherwise strict disciplinary action will be taken against you as per rules.

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI Peshawar

Dated: 11/11/2017

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

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 BCG
9. Dealing Assistant Class IV

LADY READING HOSPITAL, PESHAWAR
MEDICAL TEACHING INSTITUTION.

No. 1487-88/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.

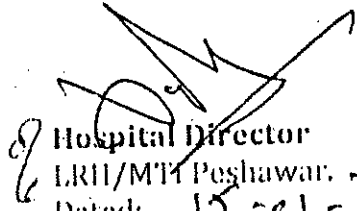
- i). Explanation were called from them but they not bother to reply or report even after verbal negotiations.

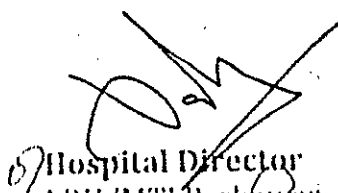
You are directed to show cause for the above stated allegation. Your reply must reach to the undersigned within Five (05) days of the issuance of this letter; otherwise strict disciplinary action would be taken against you as prescribed by law, failing which an ex-parte action will be taken against you.

No. 1487-91/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.
10/11

67



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. Muhammad Salam So Muzarab Khan *ward orderly*, LRH-MTI is hereby released with the condition that;

- a) He should be bound to join his place of duty immediately
 - b) The offices illegally occupied should be vacated immediately
 - c) 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. *4352-56*

HD LRH

Copy forwarded for information and necessary action to:-

1. Associate Hospital Director, LRH-MTI
2. Director HR LRH-MTI
3. Budget & Accounts Officer LRH-MTI
4. Superintendent Establishment LRH-MTI Peshawar.
5. Official concerned.
6. Secretary to Hospital Director, LRH, MTI

ASSOCIATE HOSPITAL DIRECTOR
Lady Reading Hospital, MTI- Peshawar.

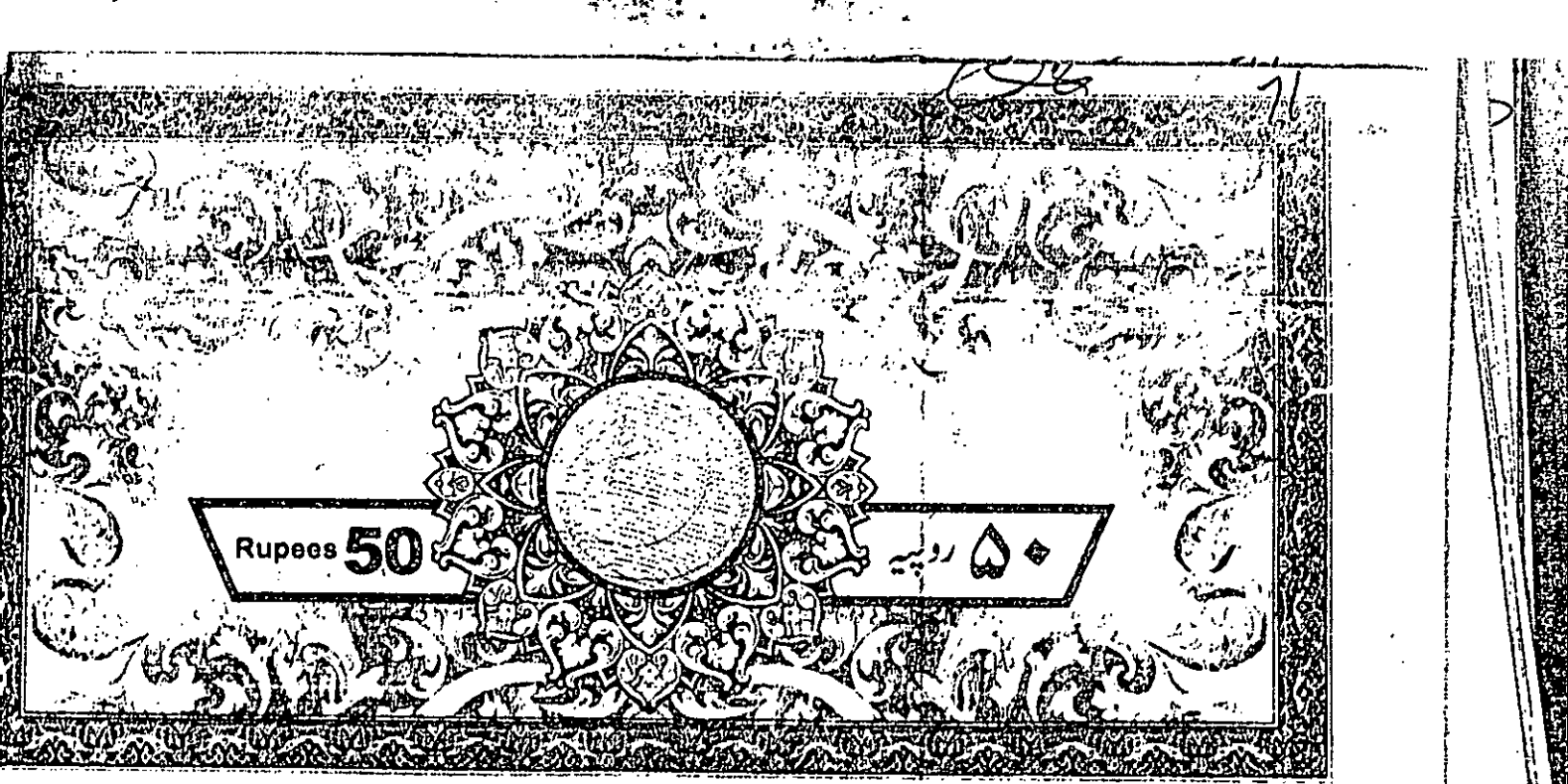
[Signature]

HOSPITAL DIRECTOR
Lady Reading Hospital, MTI
Peshawar

[Signature]

Form

27/03/18



AFFIDAVIT

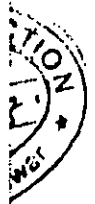
I Mr Mond Saleem s/o MUKARAB Khan permanent resident of Abbat Abad Tandyly serving as ward orderly in the Lady Reading Hospital, MTI (Medical Teaching Institution) Peshawar, do hereby solemnly affirm on oath at Peshawar that I would follow the rules, regulations and timely instructions issued by the 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

For witness

[Signature]
27/08/18



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Lady Reading Hospital, MTB Pathway
 Lady Reading Hospital, MTB Pathway. Phone: 091-4211430, Fax: -
 Email: info_lrh.gov.pk, Website: www.lrh.gov.pk
ATTENDANCE SHEET MONTH_WISE



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

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

Code	Name	Designation	Duty Date																												Actual		
			25	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
6000002644	ALFARABAD	Ward Orderly	07:52	08:04			08:15	07:51	08:04	08:11	08:24			08:06	07:38						07:21	08:03	08:15	08:14	08:11								
	SALEM		18.43	15.34			15.54	16.29	15.32	16.14	15.04			16.29	16.06						16.48	15.32	16.17	15.51	17.25								
Section Wise Total :		1																													127.44		
Department Wise Total :		1																															
Grand Total :		1																													127.44		

20

Lady Reading Hospital, MIT Pathway
 Lady Reading Hospital, MIT Pathway, Phone: 091-4211408, Fax: --
 Email: info@lrbh.gov.pk, Website: www.lrbh.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	Day Date							2017							2018							Perform							
			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
6000000145	MUHAMMAD WARIS	Ward Orderly	26:37		26:57			08:03	07:28	08:33	07:17	07:09	07:34		08:39	07:25	08:17	08:12	09:53	08:07		07:14	07:29	08:01	07:13	07:09		07:25	07:30	07:49	245.11
					17:29	18:40	13:23	08:03	07:28	19:29	07:17	20:17	07:34		06:59	07:25	18:58	17:22	20:24	08:07		19:38	07:29	17:24	07:13	07:09		18:37	07:30	07:49	212.30

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

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Lady Reading Hospital, MTI Pakistan
 Lady Reading Hospital, MTI Pakistan. Phone: 091-4211400, Fax: -
 Email: info@lrbh.gov.pk, Website: www.lrbh.gov.pk
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																												Particulars	
			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
			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
63000102544	MUHAMMAD SALEEM	Ward Orderly						G																								
Section Wise Total :																															209.32	
Department Wise Total :																															135.30	
Grand Total :																																

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Lady Reading Hospital, MTI Faisalabad
 Lady Reading Hospital, MTI Faisalabad. Phone: 091-9211408, Fax: --
 Email: info@lrh.gov.pk, Website: www.lrh.gov.pk
ATTENDANCE SHEET MONTH_WISE



From Date: 26-DEC-17 To Date: 25-JAN-18

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

Code	Name	Designation	Duty Date																												Section			
			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	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	T	Actual
60000002544	MUHAMMAD SALEM	Ward Orderly	09:01 19:42	09:09 18:54	09:12 18:31	09:20 15:58			09:23 18:23	09:36 16:16	09:23 16:42	09:02 15:45	09:50 17:01			09:30 15:56	09:07 16:56	09:29 16:25	09:18 15:25	09:17 15:48			09:25 16:25	09:21 16:29	09:23 16:38	09:27 16:54	09:14		09:29 16:40	09:37 16:34	09:27 15:53	09:24 15:39	518:12 229:30	
Section Wise Total :			1																															
Department Wise Total :			1																															
Grand Total :			1																															



Lady Reading Hospital, MTI Peshawar
Lady Reading Hospital, MTI Peshawar. Phone: 091-9211408, Fax: -
Email: info@lrbh.gov.pk, Website: www.lrbh.gov.pk
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																																
			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	25	Present	
60000002644	MLHAJIBAD SALEM	Ward Orderly	08:43			08:17	08:25	08:25	08:25	08:13				G	08:42	08:13	08:30	08:25			08:22							08:30	08:10	08:21	08:04		08:14	08:09	338.24
			14.49			18:21	16:11	16:07	17:28	08:13					17:53	14:15	16:57	16:43				18:10						18:02	17:46	18:13	18:17		14:48	14:17	212.30

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

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Lady Reading Hospital, MTI Quetta
 Lady Reading Hospital, MTI Peshawar. Phone: 091-4211430, Fax: -
 Email: info@lrh.gov.pk, Website: www.lrh.gov.pk
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																									Present	Absent	
			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
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			
60000002544	MUHAMMAD SALEM	Ward Orderly	07:56	09:01		SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	SL	08:13	SL	SL	SL	CL	CL	CL	G		14:10	42:30

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

8/1

LADY READING HOSPITAL

MEDICAL TEACHING INSTITUTION PESHAWAR

OFFICE ORDER.

Sanction is hereby ordered to the grant of 14 days Medical leave in favour of Mr. Muhammad Saleem S/O Muqarab Khan Ward Orderly of this hospital w.e.f 02.03.2018 to 15/03/2018 on full pay as admissible under the rules.

Sd/-
Hospital Director
LRH/MTI Peshawar.


No. 7300 - 03
LRH/E-IV

Dated: 14 / 03 / 2018.

Copy forwarded to the:

1. Associate Hospital Director LRH/MTI, Peshawar.
2. Budget & Account Officer MTI/LRH, Peshawar.
3. Supervisor Class-IV, LRH/MTI, Peshawar.
4. Official Concerned.

For information and necessary action.


Hospital Director
LRH/MTI Peshawar.