

# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1139/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/05/2023	The appeal of Mr. Gulzar resubmitted today by Mr. Javed Iqbal Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____
		By the order of Chairman
		 for REGISTRAR

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No 1139 of 2023

Gulzar.....Appellant

**VERSUS**

The Govt of KPK through Secretary Health  
KPK Peshawar etc.....Respondents

**APPEAL**

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**Dated 08.05.2023**

Through:-

**Gulzar**  
(Appellant)



**JAVAID IQBAL**  
**ADVOCATE HIGH COURT**  
**MANSERHA**

1

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No 1139 of 2023

Gulzar son of Kala Khan, resident of  
Shinkiari, Tehsil & District Manserha, Ex-  
Ward orderly King Abdullah Teaching  
Hospital Manshra.....**Appellant**

**VERSUS**

- 1) The Government of Khyber  
Pakhtunkhwa through Secretary  
Health KPK Peshawar.
  - 2) The Director Health Department, KPK  
Peshawar.
  - 3) Medical Superintendent KATH  
Manschra.
  - 4) Medical Superintendent DHQ Hospital  
Abbottabad.
  - 5) District Account Officer, District  
Account Office Manshra.
  - 6) Director General NADRA Islamabad.
  - 7) Assistant Director NADRA Office  
Manschra.
- .....**Respondents**

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974 AGAINST**  
**THE IMPUGNED ORDER NO 11638-40**  
**DATED 27.12.2022 PASSED BY**

RESPONDENT NO.03 WHEREBY THE  
APPELLANT RETIRED FROM SERVICE  
W.E.F 24.04.2021 ON THE GROUND OF  
WRONG AND ILLEGAL/ ALLEGED  
TEMPERED DATE OF BIRTH IN SERVICE  
BOOK AND AGAINST RESPONDENT NO. 02  
WHEREBY NON ISSUING OF ANY ORDER  
IN THE SERVICE APPEAL OF THE  
APPELLANT.

**PRAYER:-**

On acceptance of the instant service appeal, the impugned order bearing No **11638-40** dated **27.12.2022** passed by respondent No. 03 may kindly be set-aside declaring as illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect. Consequently, appellant be re-instated into service with all back benefits and the respondent No. 03 to 07 be directed to modify/correct the service record as well as CNIC and account record of appellant with enter the correct date of birth as 25.04.1967. Or issue any other order/direction to the respondents as may be deemed necessary on the facts and in the circumstances of the service appeal

**Respectfully Sheweth:-**

1. That, appellant is bona fide resident of Shinkhari Tehsil & District Manshra, his correct date of birth is 26.04.1967, but respondent No. 06 only entered the year of birth in CNIC.

**(copy of CNIC annexed as annexure "A").**

2. That, initially appellant was appointed by respondent No. 04 as Class-IV/ Ward Orderly in the year 1990. Later on appellant was transferred to KATH Manserha and since impugned order he perform his duty with great zeal and honestly, his previous service record is clear. Appellant is primary educated, during his whole service he unaware about his service record.

3. That, respondent No. 03 issued impugned order No. 11638-40 dated 27.12.2022 vide which the appellant retired from service w.e.f 24.04.2021 AN.

**(copy of impugned letter dated 24.04.2021 annexed as annexure "B").**

4. That, after knowledge of the impugned order appellant check his service record during the checking appellant found tempering with his date of birth

and the wrongly enter the date of birth  
i.e 25.04.1961.

**(copy of service book record  
is annexed as annexure "C").**

5. That, after the knowledge of cutting/tempering appellant move an application before the respondent No. 03/competent authority, the respondent No. 03 advice the appellant to move an appeal before the respondent No. 02 as higher forum.

**(copy of application is  
annexed as annexure "D").**

6. That, being aggrieved appellant filed a departmental appeal before the respondent No. 02 vide appeal dated 10.01.2023 through registered AD, which was duly received by the respondent No. 02.

**(copies of appeal dated  
10.01.2023 and receipt are  
annexed as annexure "E").**

7. That, thereafter appellant also moved a reminder appeal on dated 03.04.2023 through registered AD, but respondent No. 02 not still no any order was issued.

**(copy of reminder appeal  
annexed as annexure "F").**

8. That, respondent No. 05 also enter the wrong date of birth of appellant as 13.06.1966 and the name of the father also wrong enter "Ghulam Jelani"

which are result of the negligence of the respondents.

**(copy of Pay Slip are annexed as annexure "G").**

9. That, the appellant is youngest son of the Kala Khan according to wrong date of birth entered in the record of respondent record appellant is older than his brother Bani and sister Mava Jan. On this regard brother of appellant submitted an affidavit.

**(copy of Affidavit annexed as annexure "H").**

10. That, felling aggrieved from the impugned order, appellant having no other remedy is filing the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

### **GROUND:-**

- A) That, the impugned order is wrong, illegal, arbitrary, perverse, against the law and against the record hence liable to be set-aside.
- B) That, admittedly neither notice was issued to the appellant before passing the impugned order nor appellant

knowledge the wrong entry of date of birth before passing the impugned order, So, on this very sole ground, the impugned order is liable to be out rightly declared as illegal.

- C) That, appellant correct date of birth 25.04.1967, initially which was correctly entered in the service book but during the service of appellant respondents No. 03 and 04 subordinate/ clerical staff with mala-fide intention cutting/tempering the date of birth of appellant as 25.04.1961, the correct entry of year of birth also mentioned in the CNIC of the appellant and cutting also clear in service record.
- D) That, even appellant was not called for personal hearing by respondents before issuing his retirement order in the shape of the impugned orders. According to section 13 of Civil Servant (appointment, promotion and transfer) Rule 1973 respondent No. 03 is duty bound to issue a notice before retirement on the age of superannuation, but no notice was served upon the appellant.
- E) That, the impugned orders are patently illegal, void, unlawful, without lawful

authority, without jurisdiction and of having no legal effect.

- F) That, the impugned orders are fraught with inherent illegalities in the light of the law applicable to the case in hand.
- G) That, the impugned orders are not only legally flawed but unjustified and unwarranted, in view of the facts and circumstances of the case in hand.
- H) That, appellant was never confronted with the alleged wrong entry of date of birth at any point of time, condemning him unheard which is not only illegal but against the principles of Natural Justice and fair play.
- I) That, before passing the impugned orders, appellant was not put on notice to present his view point/explanation under the Doctrine of **AUDI AULTEM PARTEM**, hence, the impugned orders are not sustainable and maintainable under the law on this very sole ground.
- J) That, in view of the aforesaid factual and legal aspects of the case, the impugned orders are seemingly perverse, arbitrary, fanciful and in contravention of the law, rules and principles of Natural Justice and as such liable to be set-aside.

- K) That, on the wrong, negligence varied entry of the respondents in the service record as well as CNIC the family of the petitioner also disturb and the petitioner have suffer irreparable service loss, it is pertinent to mentioned here that the above said correction is not suffer any other person, but the value able rights of the appellant involved in this service appeal.
- L) That, the appellant belong to poor family and the service is only source of income, impugned order on this stage without informing/notice as amount to financial murder of the appellant.
- M) The respondent No. 02 still now not issue any order hence the instant appeal is within time.
- N) That, the other grounds would be agitated at the time of arguments.

**PRAYER:-**

On acceptance of the instant service appeal, the impugned order bearing, No **11638-40** dated **27.12.2022** passed by respondent No. 03 may kindly be set-aside declaring as illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect. Consequently, appellant be re-instated into service with all back benefits and the respondent No. 03 to 07 be directed to modify/correct the service record as well as CNIC and account record of appellant with enter the correct date of birth as 25.04.1967. Or issue any other order/direction to the respondents as may be deemed necessary on the facts and in the circumstances of the service appeal

**Dated 08.05.2023**

**Gulzar**  
(Appellant)

Through:-

**JAVAID IQBAL**  
**ADVOCATE HIGH COURT**

**MANSERHA**

**VERIFICATION :**

I, Gulzar son of Kala Khan, resident of Shinkiari, Tehsil & District Manserha, Ex-Ward orderly King Abdullah Teaching Hospital Mansehra, do hereby solemnly affirm and declare that the contents of fore-going Appcal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

**Gulzar**  
(DEPONENT)

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_ of 2023

Gulzar.....Appellant

**VERSUS**

The Govt of KPK through Secretary Health  
 KPK Peshawar etc.....Respondents

**APPEAL**

**AFFIDAVIT**

I, Gulzar son of Kala Khan, resident of Shinkiari, Tehsil & District Manserha, Ex-Ward orderly King Abdullah Teaching Hospital Mansehra, do hereby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court nor pending nor decided. That the contents of fore-going affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

**Dated 08.05.2023**

**GULZAR**  
**(DEPONENT)**

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2023

Gulzar.....**Appellant**

**VERSUS**

The Govt of KPK through Secretary Health  
 KPK Peshawar etc.....**Respondents**

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

**APPELLANT:**

Gulzar son of Kala Khan, resident of Shinkiari, Tehsil & District Manserha, Ex-Ward orderly King Abdullah Teaching Hospital Manshera.

**RESPONDENTS:**

- 1) The Government of Khyber Pakhtunkhwa through Secretary Health KPK Peshawar.
- 2) The Director Health Department, KPK Peshawar.
- 3) Medical Superintendent KATH Manshera.
- 4) Medical Superintendent DHQ Hospital Abbottabad.
- 5) District Account Officer, District Account Office Manshera.
- 6) Director General NADRA Islamabad.
- 7) Assistant Director NADRA Office Manshera.

**Dated 08.05.2023**

**Gulzar**  
(Appellant)

Through:-

**JAVAID IQBAL**  
**ADVOCATE HIGH COURT**  
**MANSERHA**



12

Annexure "A"

**PAKISTAN** National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN

Name: Muhammad Gulzar

Father Name: Kala Khan

Gender: M Country of Stay: Pakistan

Identity Number: 13503-0137171-1 Date of Birth: 01.01.1967

Date of Issue: 02.01.2023 Date of Expiry: Lifetime

Holder's Signature

13503-0137171-1

سید محمد گلزار، تحصیل و ضلع ماہرہ

سید محمد گلزار، تحصیل و ضلع ماہرہ

101221606978  
123-65-183965

Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

حکومت پاکستان  
 قومی شناختی کارڈ  
 13503-0137171-1



نام: گلزار  
 جنس: مرد  
 والد کا نام: کالا خان  
 شناختی علاقہ: تھرو  
 تاریخ پیدائش: 1967

ممبران  
 دستخط

S0K8G1  
 13503-0137171-1



تاریخ پیدائش: 31/03/2017  
 تاریخ رجسٹریشن: 18/04/2006



(15)  
Annexure " B "

OFFICE OF THE MEDICAL SUPERINTENDENT  
KING ABDULLAH TEACHING HOSPITAL MANSEHRA

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra @ gmail.com  
Website: www. kathmansehra.com

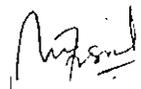
No. \_\_\_\_\_  
Dated \_\_\_\_\_ /2022 .

OFFICE ORDER.

The Competent authority is please to accord Grant of Leave encashment of 365 days in lieu of LPR as admissible to Mr. Gulzar S/O Kala Khan , Ward Orderly BPS-05 attached to King Abdullah Teaching Hospital Mansehra.

The Official shall stand retire from Service w.e.f.24.04.2021 A.N on attaining the age of superannuation (i.e.60 years) according to his service book.

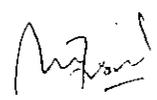
His Date of Birth according to Service Book 25-04-1961

  
Medical Superintendent  
King Abdullah Teaching  
Hospital Mansehra

No. 11638-4/D / Dated Mansehra the 27 / 12 / 2022.

Copy forwarded to the:-

1. District Account Officer Manshra.
2. Account Section Office of the undersigned.
3. Official Concerned.  
for information.

  
Medical Superintendent  
King Abdullah Teaching  
Hospital Mansehra.

Annexure "C"

15

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

Name

گلزار

Race

سین

Residence

قائم آباد - ضلع - باجوڑ

Father's name and residence

گلزار

Date of birth by Christ an era as nearly as can be ascertained

1961 (Twenty Fifth of April 1961 and Sixty one)

Exact height by measurement

5-8

Personal marks for identification

A - mil out side the eye

Left hand thumb and finger impression of (non-gazetted) officer

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

Signature of Government servant

Medical Superintendent  
A.B.Q. Hospital - Abbottabad

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

1 Name of post	2 Whether substative or officiating and whether permanent or temporary	3 If officiating, state (i) substative appointment, or (ii) whether service contract for pension under Art. 371 C. S. II.	4 Pay in substative pos.	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government Officer	9 Signature designation and of the officer in attendance of column
<u>625-16-905</u> word order by D.O. Hajjilal M.A.			pay R 625/- PM			15 <sup>4</sup> / 1990		
do			pay R 644/- PM			15 <sup>12</sup> / 90		B.R.Q. Ho
<u>945-32-1425</u> word order by D.O. Hajjilal M.A.			pay R 1073/- PM			1 <sup>6</sup> / 91		Service ver 15 90
do			pay R 1105/- PM			1 <sup>12</sup> / 91		Med B.H.Q. Ho
do			pay R 1137/- PM			1 <sup>12</sup> / 92		30 <sup>11</sup> / 92 Medical Q. Hospital
do			pay R 1109/- PM			1 <sup>12</sup> / 93		B.R.Q. Ho

Office of the Accountant General  
N.W.F.P. Trichy  
Pay Band in the Revised Pay Scale 1991  
No. 945-32-1425 (B2)  
No. 1073/- N.W.F.P. 1-1-91  
Date from 1-1-1991

9	10	11	12	13		14	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	relaxation of period of leave on average pay, upto four months for which leave salary is debitabale to another Government.	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Period	Government to which debitabale		

*Appointed as a ward officer in D.H.Q. Hospital Multan vide N.S. Lett No 1971-72/197 dated 19-4-1990.*

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

*30 11/90*

*Annual Increment allowed*

*Service verified from 12 6 30 11/89 to 90*

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Service verified from

*12 6 30 11/89 to 90*  
*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Annual Increment Allowed

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Pay Fixed in Revised BPS No. 17 vide Govt. of NWFP, F. No. 1003 Deptt: Peshawar letter No. FD(PRC)1-1/89 dated 11-8-1991.

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Annual Increment Allowed

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Service verified from

*12 6 30 11/89 to 92*  
*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

*30 11/92*

Annual Increment Allowed

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Service verified from

*12 6 30 11/89 to 92*  
*[Signature]*  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

1 Name of post	2 Whether substantive and whether permanent or temporary	3 If officiating (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments under the terms of pay	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the head of the office or other attesting officer in attestation of column 1 to 8
1875-46-1935 Postal delivery D.D. Hajipur D.D.								
				1583/		1/6/1996		
				1627/		1/12/1996		
				1674/		1/12/1996		
				1719/		1/12/1996		

Medical  
D.H.Q.H.

Medical  
D.H.Q.H.

Medical  
D.H.Q.H.

9	10	11	12	13	14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Period Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant.

Pay Fixed in Govt. BPS No. (B)  
 vide Govt. of N.V.F.P. Finance  
 Deptt. P.O. No. letter No.  
 F.D. No. 1194 dated 30-6-1994  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

30/11/94

Signature  
 Medical Superintendent  
 D.H.Q. Hospital, Abbottabad

Annual Increment Allowed  
 Signature  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Service verified from  
 1/12/93 to 30/11/94  
 Signature  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

30/11/95

Signature  
 Medical Superintendent  
 D.H.Q. Hospital, Abbottabad

Annual Increment Allowed  
 Signature  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

Service verified from  
 1/12/94 to 30/11/95  
 Signature  
 Medical Superintendent  
 D.H.Q. Hospital - Abbottabad

30/11/96

Signature  
 District Hospital Officer  
 Abbottabad

Annual Increment Allowed  
 Signature  
 District Hospital Officer  
 D.H.Q. Hospital - Abbottabad

Service verified from  
 1/12/95 to 30/11/96  
 Signature  
 District Hospital Officer  
 D.H.Q. Hospital - Abbottabad



9 Signature and designation of the officer of the office or other authority in which the appointment of the candidate is made	10 Date of termination of appointment	11 Reason for termination (resignation, suspension, dismissal, etc.)	12 Signature of the head of the office or other appointing officer	13 Nature and duration of leave taken Period Government to which debitable	14 Signature of the officer in charge of the office or other appointing officer	15 Reference to any recorded punishment or censure, or other remarks of the Government Servant
	30/11/97		Annual increment allowed		SERVICES VERIFIED upto & for 1/12/97 to 30/11/97	
Medical Superintendent, D.H.Q. Hospital Abbottabad			Medical Superintendent, D.H.Q. Hospital Abbottabad		Distt. H.Q. Hospital A. Abad.	
30/11/98 AN			Annual Increment Allowed		Services Verified for 1-12-97 to 30-11-98 AN	
Medical Superintendent, D.H.Q. Hospital Abbottabad			Medical Superintendent, D.H.Q. Hospital Abbottabad		Superintendent, Hospital Abbottabad	
30/11/99 AN			Annual Increment Allowed		Services Verified for 1-12-98 to 30-11-99 AN	
Medical Superintendent, D.H.Q. Hospital Abbottabad			Medical Superintendent, D.H.Q. Hospital Abbottabad		Medical Superintendent, D.H.Q. Hospital Abbottabad	
30/11/2000 AN			Annual Increment Allowed		Services Verified for 1-12-99 to 30-11-2000 AN	
Medical Superintendent, D.H.Q. Hospital Abbottabad			Medical Superintendent, D.H.Q. Hospital Abbottabad		Medical Superintendent, D.H.Q. Hospital Abbottabad	
30/11/2001 AN			Reported arrival on 18/8/2001 PN		Services Verified for 1-12-2000 to 30-8-2001 AN	
Medical Superintendent, D.H.Q. Hospital Abbottabad			Medical Superintendent, D.H.Q. Hospital Abbottabad		Medical Superintendent, D.H.Q. Hospital Abbottabad	

Name of post

Whether substantive or officiating and whether permanent or temporary

If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.

Pay in substantive post

Additional pay for officiating

Other emolument falling under the term 'Pay'

Date of appointment

Signature of Government servant

Signature of head of office

14 of Jan

1935

(1994)  
 Office of the Assistant General  
 N. W. F. P. Peshawar.  
 Pay Fixed in the revised basic pay scale 1994  
 of Rs. 1837-11-1835 (BPS 2)  
 of Rs. 1837-11-1835 (BPS 2)  
 with next increment on 1-12-1994  
 Accounts Officer  
 Pay Fixation Party N.W.F.P. Peshawar

1915-65-3865

02

1935

2990 PM

01-12-1994

Office of the Assistant General  
N.W.F.P. Peshawar.

Pay Fixed in the revised basic pay scale 1994  
 of Rs. 1915-65-3865 (2)  
 at Rs. 2890 PM  
 with next increment on 1-12-2001

Accounts Officer  
Pay Fixation Party N.W.F.P. Peshawar

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Allocation of period of leave on average pay up to four months for which leave salary is debitable to another Government		14 Signature of the head of the office or other attesting officer	References to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Period to which Government is debitable		

Transferred to DHQ Hospital Abbottabad

vide Secretary to Govt. of NWFP Lahore

Ends order no Sot/Budget/H/8/97-98 Service Verified

dated 12-01-2002

upto 14-1-2002

*[Signature]*

*[Signature]*

Medical Superintendent  
DHQ Hospital Mansehra

Medical Superintendent  
DHQ Hospital Mansehra

Medical Superintendent  
DHQ Hospital Mansehra

Reported in DHQ Hosp  
Att. on 15/01/2002

*[Signature]*  
Medical Superintendent  
DHQ Hospital Abbottabad

12-11-2001

Annual Increment  
Allowed

Service Verified from  
1-12-2000 To 30-11-2001

*[Signature]*  
Medical Superintendent  
DHQ Hospital Abbottabad

*[Signature]*  
Medical Superintendent  
DHQ Hospital Abbottabad

*[Signature]*  
Medical Superintendent  
DHQ Hospital Abbottabad

7/ Dec 03 Month 1-12-2001 to Rs 10102/00  
2001- DAO Chgo A 8324 GF  
Date 19/2/2002

PAY Fixed & PAY RENEWAL NFR  
- 2001 Govt of N.W.F.P  
Finance Department notified  
FOPRC on 1/2001 DAD 27/10/2001

*[Signature]*  
Medical Superintendent  
DHQ Hospital Abbottabad

*[Signature]*  
Medical Superintendent  
DHQ Hospital Abbottabad

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating; permanent or temporary	If officiating, state (a) substantive appointment, or (b) whether service counts for pension under Act 171, U. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "pay"	Date of appointment	Signature of Government
<i>Mate</i>				<i>2890/</i>			
<i>1915-85-3865</i>				<i>P.M.</i>			
<i>d</i>				<i>2890/</i>			
				<i>P.M.</i>			

Signature of Government

Name of the employee	Date of termination of appointment	Reason of termination	Signature of the head of the office or other attending officer	Nature of leave taken	Amount of leave taken	Signature of the head of the office or other attending officer	Remarks
Medical Superintendent DHQ Hospital Abbottabad	21-3-2002		[Signature]			[Signature]	[Remarks]
[Signature]			[Signature]			[Signature]	[Remarks]
[Signature]			[Signature]			[Signature]	[Remarks]
[Signature]			[Signature]			[Signature]	[Remarks]
[Signature]			[Signature]			[Signature]	[Remarks]

Medical Superintendent  
DHQ Hospital Abbottabad

Medical Superintendent  
DHQ Hospital Abbottabad

Transfer and post of B.S. 10  
Department of Mechanical Services  
Abbottabad

[Signature]

Medical Superintendent  
DHQ Hospital Abbottabad

[Signature]

Transfer and post of B.S. 10  
Department of Mechanical Services  
Abbottabad

26/5/2002 dated 26/5/2002  
services for the post of  
[Signature]

Deputy Director  
(B&S) Mechanical Services  
Department Abbottabad

Deputy Director (B&S)  
Mechanical Services Deptt.  
Abbottabad

Transfer and post of B.S. 10  
Hospital [Signature]

NO. 7142 dated 27/5/2002

Medical Superintendent who has been placed on surplus

Abbottabad dated 29/5/2002

Name, Position, etc.	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive position, or (ii) whether service rendered for position under Art 3712 C.S.R.	Pay in substantive position	Additional pay for officiating	Other emolument payable	Date of appointment	Remarks
1915-365-3865 Hospital Peshawar							
u				3020/-		01-12-2003	
<p>2001</p> <p>OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. PESHAWAR</p> <p>PAY FIXED IN THE REVISED BASIC PAY SCALES 2001</p> <p>OF RS. ....</p> <p>AT RS. ....</p> <p>With Next Increment on</p>							
<p>Accounts Officer Pay Fixation Party N.W.F.P. Peshawar</p>							
u				3085/-		01-12-2004	
R-12-200-75-4450/- 190				3550/-		01-12-2004	

Pay Rs. 2955/-

(2003)  
Office of the Accountant General  
N.W.F.P. Peshawar  
Pay Fixed in the revised basic pay scale-2001 of Rs. 2550/- P.N. with next increment to 01-12-2003

Accounts Officer  
Pay Fixation Party

*She*  
 Medical Superintendent  
 DHO Hospital, Mansobra

Annual Increment Allowed

Service Verified  
 Up to 30-11-2002

*She*  
 Medical Superintendent  
 DHO Hospital, Mansobra

*She*  
 Medical Superintendent  
 DHO Hospital, Mansobra

*30/11/2003*

*Annual Increment Allowed*

*Service Verified up to 30/11/2003*

*She*  
 Medical Superintendent  
 DHO Hospital, Mansobra

*She*  
 Medical Superintendent  
 DHO Hospital, Mansobra

*She*  
 Medical Superintendent  
 DHO Hospital, Mansobra

*Drawn by 36/11/02 as  
 verified by 27/02  
 V. S. T. A. - 28/11/04*

*30/11/2004*

Annual Increment Allowed

District Accounts Officer  
 Mansobra

Service Verified  
 Up to 30-11-2004

*She*  
 Medical Superintendent  
 District General Hospital  
 Mansobra

*She*  
 Medical Superintendent  
 District General Hospital  
 Mansobra

*She*  
 Medical Superintendent  
 District General Hospital  
 Mansobra

*For Annual Increment allowed  
 from 1st April 2005 onwards*

*She*  
 Medical Superintendent  
 District General Hospital  
 Mansobra

1	2	3	4	5	6	7
Name of post	Address of post	Post office				

A 329-75-445  
WFO

36257-

12  
1-2005

Reg. (containing) of 1-3-2006

36257 AM (MERA)

Post office

do

3700-

13  
1-2005 AM

"

42302 P.M. 1/7/07 P.M.

3-2015-105-5615 (B-32)

43151 P.M. 1/7/07 P.M.

"

44151 P.M. 1/7/07 P.M.

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason for termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant.
					Period		
					Government to which detailed		
	30/11/2005	Annual Increment Allowed				Service Verified Upto 30-11-05	
<i>[Signature]</i> Medical Superintendent, District Headquarter Hospital Mansehra.			<i>[Signature]</i> Medical Superintendent, District Headquarter Hospital Mansehra.			<i>[Signature]</i> Medical Superintendent, District Headquarter Hospital Mansehra.	
	30/11/2006	Annual Increment Allowed.				Service Verified Upto 30-11-2006	
<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.			<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.			<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.	
<p>Pay fixed in revised pay scale vide Govt. of NW.F.D. P.D. Notification No. F.D(PRC)1-1/2007 Dated 20/3/07.</p> <p>Pay scale upgraded vide Govt. of NW.F.D. P.D. Notification No. F.D(PRC)7-2/2007 Dated 28/7/2007</p>							
<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.			<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.			<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.	
	30/11/07 N.N.	Annual Increment Allowed.				Service Verified for 4/11/2005 to 30/11/2007	
<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.			<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.			<i>[Signature]</i> MEDICAL SUPERINTENDENT D.H.Q. (TEACHING) HOSPITAL MANSEHRA.	





1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "pay"	Date of appointment	Signature of Government servant
3140-120-6740 ward orderly			5660/p.m			01/12/2009	
— 2 —			5780/p.m			01/12/2010	
Se So-200-11050 ward orderly			9450/p.m			1/7/2011	
4315/3	7						
5420/3	8						
9450/3	11						

OFFICE OF THE COMPTROLLER GENERAL  
KHYBER PAKHTUNKHWA  
PAKISTAN

OF RS. 5200-200-11050  
AT RS. 9450/p.m.  
With Next Increment of

Maulana  
Account Officer  
Pay Band: Pay B/Psikhunthwa  
Peshawar

12/1/11



1 Name of post	2 Whether substantive or officiating and whether permanent or temporary.	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. Is.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term 'Pay'.	7 Date of appointment	8 Signature of Government servant	9 Signature designated head of other officer in of column
5050-200-11050 w/orderly BPS-3			9650/p.m			01/12/2011		
d			9850/p.m			01/12/2012		
ll			10050/p.m			01/12/2013		
m			10250/p.m			01/07/2014		

30/12/11

Annual Increment Allowed

Service Verified

Up to 30-11-2011

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

30/12/12

Annual Increment Allowed

Service Verified

Up to 30-11-2012

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

30/12/13

Annual Increment Allowed

Service Verified

Up to 30-11-2013

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

*[Signature]*  
Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

Allowed on Promoter Payment vide Finance Department  
No. 10 (No. 52-132) 23/10/13 dated 23/10/13

*[Signature]*

Medical Superintendent  
King Abdul Aziz Teaching  
Hospital, Mansoura

(For use in Police Department only).

Heirs,

Note: The 9 and 10 sh

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

Verification Roll No: \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

Left Thumb Impression:

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L. Or B.A	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualifications	
Drill Instructing			
Court Duties			
Reserve Duties			

N.B. Line to be drawn under the qualification possessed.

The entries on this page should be renewed or re-attested at least every five years and the Signature to lines 10 should be dated.

Name: Gulzar

Part II

Race: Muslim

Residence: Village & Po Shinkari  
Tehsil & District Mausehra

Father's name and residence: Kala Khan

Date of birth by Christian era as nearly as can be ascertained: 1961

Exact height by measurement: 5' 6"

Personal marks for identification: A mole outside the  
RT Eye

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: \_\_\_\_\_ Ring Finger: \_\_\_\_\_

Middle Finger: \_\_\_\_\_ Fore Finger: \_\_\_\_\_

Thumb: \_\_\_\_\_

Signature of Government Servant:

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

1	2	3	4	5	6	7	8	9
Name of Post	Substantive Whether Substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8
5050-200-11050 ward orderly BPS-03				10450/P.m		01/12/2014		
6535-260-14335 ward orderly BPS-03				13555/P.m	✓	01/07/2015		
6985-340-17185 ward orderly BPS-05				13785/P.m		01/07/2015		
—				14125/P.m	✓	01/07/2015	District Accounts Manager	

8	9	10	11	12	13		14	15
Signature of Government servant	Signature and Designation of the head of the officer or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the officer or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
		30 <sup>11</sup> / <sub>2014</sub>				Annual Increment Allowed		Service Verified up to 30-11-2014
		<i>Dr.</i>		<i>Dr.</i>				
		Medical Superintendent King Abdullah Teaching Hospital Mansobra		Medical Superintendent King Abdullah Teaching Hospital Mansobra				Medical Superintendent King Abdullah Teaching Hospital Mansobra
						Basic Pay Scale revised vide Govt. of KPR Finance Department Notification No. FD(PRC)1-1/2015 Dated 27/07/2015.		
				<i>Dr.</i>				
				Medical Superintendent King Abdullah Teaching Hospital Mansobra				
						Basic Pay upgraded vide Govt. of KPR Finance Department Notification No. FD/50 (PR) 7-20/2015 Dated 30 <sup>06</sup> / <sub>2015</sub>		
				<i>Dr.</i>				
				Medical Superintendent King Abdullah Teaching Hospital Mansobra		one signature increment allowed		
				<i>Dr.</i>				
				Medical Superintendent King Abdullah Teaching Hospital Mansobra				
							T-N0426 6/10	
							(i) pay chage @ Rs. 14125/000 01-05-2015 in 10/2015	
							(ii) Drawn different pay scale with 1 <sup>2</sup> / <sub>15</sub> to 31 <sup>2</sup> / <sub>15</sub>	
							Rs. 2061/ in 10/2015	
							District Accounts Mansobra	

*Medical*  
strict Accounts  
Mansobra

District Accounts  
Mansobra

1	2	3	4	5	6	7	8
Name of Post	Substantive Whether Substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant.
6985-340-17185 Ward order	14 BPS-05			14465/P.M		12/1/2015	
8590-420-2190 Ward order	14 BPS-05			17830/P.M		2/1/2016	
- N -				18250/P.M		12/1/2016	

Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 7

Medical Superintendent  
Kung Abri Hospital



1	2	3	4	5	6	7	8
Name of Post	Substantive Whether Substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
10250-500-25260 9900-440-23100 Ward orderly B.P.S-5				21760/-	✓	01/12/2017	
- 2 -				22260/-		12/2017	
		<p>URGENT</p> <p>General</p> <p>Why not position fixed pay</p> <p>pay fixed in the Revised Basic Pay Scale</p> <p>R.B.P.S 6535 260 10/01/2017</p> <p>Pay fixed @ Rs 260 10/01/2017</p> <p>260 480 21/12/17</p> <p>Pay fixed @ Rs 22830 01/12/2017</p> <p>M.H.P.S 6280 01/12/2017</p> <p>Pay fixed @ Rs 21760/- 01/12/2017</p> <p>Date of NCA increment on 01-12-2017</p>					
- 2 -		<p>Account Officer</p> <p>Fixation Post</p> <p>22760/-</p>		22760/-		12/2018	

Signature and Date of the head of the office or other attesting authority in attestation columns 1

Med  
Oin



1	2	3	4	5	6	7	8	9
Name of Post	Substantive Whether Substantive or officialing and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant	Signature and Designation of the head of the office or other attesting authority in attestation columns 1 to 4
10260-500 ward orderly	25260 BPS-05			23260/-		12/2019		
A				23760/-		12/2020		
M				24260/-		12/2021		
Service Verified Up to		Annual Increment Allowed						
Medical Superintendent King Edward Medical College Muzaffargarh		Well known						
		Well known						

8	9	10	11	12	13		14	15
Signature of Government servant	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
						Period		
		30/11/2019			Annual Increment Allowance		Service Verified Up to 30-11-2019	
	Deputy Medical Superintendent P.A.T Hospital Manshehra			Deputy Medical Superintendent P.A.T Hospital Manshehra				
		30/11/2020			Annual Increment Allowance		Service Verified Up to 30-11-2020	
	Deputy Medical Superintendent P.A.T Hospital Manshehra			Deputy Medical Superintendent P.A.T Hospital Manshehra				
		30/11/2021			Annual Increment Allowance		Service Verified Up to 30-11-2021	
	Medical Superintendent King Abdullah Teaching Hospital Manshehra			Medical Superintendent King Abdullah Teaching Hospital Manshehra				

Mem  
Kin

1	2	3	4	5	6	7	8	9
Name of Post	Substantive Whether Substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post.	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant	Signature and De of the head of the or other attesting in attestation columns 1 to
18230-750-37730								
Ward Orderly BPS-05				36280/-		01/07/2022		Re Pic 01

18230-750-37730

Ward Orderly BPS-05

36280/-

01/07/2022

Re  
Pic  
01

18230-750-37730

Ward Orderly BPS-05

36980/-

01/12/2022

30/11/2022

M  
K  
8



بخدمت جناب میڈیکل سرنٹنڈنٹ کنگ عبداللہ ٹیچنگ ہسپتال

مانسہرہ

اپیل برخلاف آفس آڈر نمبر 40-11638 مورخہ 27-12-2022

عنوان:

بحوالہ آفس آڈر نمبر 40-11638 مورخہ 27-12-2022 موصول ہوا جس کے مطابق مجھے نوکری سے برانہ سالی کے مطابق ریٹائر کر دیا گیا سروس بک، ریکارڈ کے مطابق سیرئی تاریخ پیدائش 1961 درج ہے گزارش ہے کہ سائل بحثیت وارڈ بوائے ڈسٹرکٹ ہیڈ کوارٹر ہسپتال ایٹ آباد میں بھرتی ہوا۔ سائل کی شناختی کارڈ میں تاریخ پیدائش 1967 درج ہے اور سائل کی سروس بک میں بھی 1967 درج کی گئی تھی۔ سروس بک میں کٹینگ کر کے 1961 کی گئی ہے جو کہ سامنے نظر آرہی ہے۔ اس کی انکوائری کی جائے اور انکوائری کے فیصلے تک سیرے ریٹائرمنٹ کے آڈر کو التوا (Held in abeyance) کیا جائے اور سچے انصاف فراہم کیا جائے۔

سائل تاحیات دُعا گو رہے گا۔

العارض

گلزار ولد کالا خان

وارڈ بوائے

کنگ عبداللہ ٹیچنگ ہسپتال مانسہرہ

شناختی کارڈ نمبر 1-137171-013503

بخدمت جناب ڈائریکٹر صاحب محکمہ ہیلتھ ڈیپارٹمنٹ خیبر پختونخواہ پشاور

اپیل برخلاف آفس آرڈر 40-11638 مورخہ 27.12.2022

جناب عالی! درخواست ذیل پیش ہے۔

(۱) یہ کہ سائل شنکاری تھیں ضلع مانسہرہ کا رہائشی ہے۔ جناب کے محکمہ میں ابتدائی طور پر DHQ ہسپتال ایبٹ آباد میں بطور کلاس فور/ وارڈارڈی سہ ماہیہ 1990ء میں بھرتی ہوا۔ اور بعدہ کنگ عبداللہ ٹیچنگ ہسپتال مانسہرہ میں ٹرانسفر ہو کر اپنے فرائض منصبی بطریق احسن سرانجام دیتا رہا۔ دوران سروس سائل کا ماضی بے داغ رہا اور کبھی بھی کوئی شکایت/ انکوائری وغیرہ نہیں ہوئی۔

(۲) یہ کہ عرصہ دو ہفتہ قبل سائل کو MS آفس مانسہرہ کی طرف سے کہا گیا کہ آپ کی عمر ریٹائرمنٹ سے زیادہ ہو گئی ہے اور آپ سے ریٹیریٹی ہوئی ہے۔ جس پر سائل نے سروس بک وغیرہ کا جائزہ لیا تو علم ہوا کہ سروس بک میں سائل کی تاریخ پیدائش کے ساتھ کنگ Tempering کی ہوئی ہے۔

(۳) یہ کہ سائل کی درست تاریخ پیدائش برطانیہ میوئل وکپیوٹرائزڈ شناختی کارڈ 1967 ہے۔ (نقل شناختی کارڈ لف ہے)۔

(۴) یہ کہ سائل کو جاری کردہ لیٹر نمبری 40-11638 مورخہ 27.12.2022 سر اسر غلط، خلاف قانون ہے۔ کیونکہ سائل کو لیٹرنڈ کور جاری کرنے سے قبل کوئی شنوائی کا موقع فراہم نہیں کیا گیا اور نہ ہی سائل کو اس غلط اندراج کی نسبت آگاہ کیا گیا۔ (نقل لیٹرف ہے)۔

(۵) یہ کہ سائل نے باضابطہ طور پر MS صاحب کو درنگی کی نسبت درخواست بھی گزاری لیکن کوئی شنوائی نہ ہو سکی۔ بلکہ آپ جناب کے پاس اپیل دائر کرنے کی ہدایت ہوئی۔

(۶) یہ کہ سائل ایک غریب گھرانے تعلق رکھتا ہے اور مہنگائی کے اس دور میں قطعی طور پر ریٹائرمنٹ حاصل نہیں کرنا چاہتا اور۔۔۔ اس لیے سائل کی ریٹائرمنٹ کی عمر پوری ہوئی ہے سائل

اپنی سروس مکمل کر کے بعد از تکمیل سروس ریٹائرمنٹ حاصل کریگا۔ محکمہ کی جانب سے سائل کو Technicalites کی بنیاد پر ملازمت سے ریٹائرمنٹ کرنا سراسر غلط اور خلاف قانون ہے۔ سائل سروس ریکارڈ میں درستی کا مستعدی ہے۔

(۷)۔ یہ کہ آرڈر مذکور غلط، خلاف قانون، ہونے کے حقوق سائل پر کا اعدام باطل ہے اور قابل منسوخی ہے۔ لہذا استدعا ہے کہ آرڈر نمبر 11638 مصدرہ 27.12.2022 کو کا اعدام و منسوخ فرمایا جا کر سائل کو ملازمت پر بحال فرمایا جائے۔

عبوری ریپٹ:

مزید برآں استدعا کی جاتی ہے کہ تافصلہ اپیل MS صاحب کو ہدایت فرمائی جائے کہ وہ سائل کی تنخواہ بند کرنے، ڈیوٹی سے روکنے یا سائل کے خلاف تادیبی کارروائی کرنے سے ابداً باز رہیں۔

المرقوم 10.01.2023

گلزار ولد کا اٹخان ماکہ شہنشاہی تحصیل ضلع مانسہرہ سائل



ورڈارڈلی متعینہ KATHI مانسہرہ

موبائل نمبر: 0341-9046428

03130530405

copy to MS King Abdullah Hospital  
Manshira.

52



ACKNOWLEDGEMENT DUE CARD (Registered)

نام: سجاد احمد ایدو کنٹ باک کورس 0345-9610749

پتہ: آئمن منبر 4 اکبر شاہ لائسنس بلڈنگ

ڈاکخانہ: کھیڑو روڈ ماہرن تحصیل ضلع

پوسٹ کوڈ:

(پوسٹ کوڈ لکھنا ضروری ہے)

RP-54

## رسید

رجسٹری یا بیرہ بھیجنے والے کو پست پر دیئے گئے پتہ پر واپس بھیجا جائے۔

☆ ایک رجسٹری  
برائے (نام) ڈاکٹر سید عبدالجبار حسین بیگم  
• بیرہ کی مالیت 1000/-  
مکتوب الیہ کے دستخط محمد علی

نمبر 1000  
Date 10/10/2010  
Main Diary No. 1000  
Date 10/10/2010

لشاور  
وصول پالی

GR. G. H. S. H. R. A.

☆ یہاں جمعی "پست کارڈ" ٹیکٹ یا "پاسٹ" ٹیکٹ میں لفظ "بیرہ" پلے تجزیہ کریں۔

• صرف بیرہ کی صورت میں یہاں اندراج کیا جائے۔ بصورت دیگر کٹ دیا جائے۔

رجسٹریشن فیس تین روپے -/Rs.30

قیمت: تیس روپے -/Rs.20

بخدمت جناب ڈائریکٹر صاحب محکمہ ہیلتھ ڈیپارٹمنٹ خیبر پختونخواہ پشاور

درخواست / ریمانڈر بابت عملدرآمد کرنے اپیل محررہ 10.01.2023 برخلاف

آفس آرڈر 40-11638 مورخہ 27.12.2022

جناب عالی! درخواست ذیل پیش ہے۔

(۱) یہ کہ سائل شتیااری تحصیل و ضلع مانسہرہ کارہائشی ہے۔ جناب کے محکمہ میں ابتدائی طور پر DHQ ہسپتال ایبٹ آباد میں بطور کاس فور / وارڈ اردلی ماہ اکتوبر 1990ء میں بھرتی ہوا۔ اور بعدہ کنگ عبداللہ ٹیننگ ہسپتال مانسہرہ میں ٹرانسفر ہو کر اپنے فرائض منصبی بطریق احسن سرانجام دیتا رہا۔ دوران سروس سائل کا ماضی بے داغ رہا اور کبھی بھی کوئی شکایت / انکوآری وغیرہ نہیں ہوئی۔

(۲) یہ کہ عرصہ دو ہفتہ قبل سائل کو TMS آفس مانسہرہ کی طرف سے کہا گیا کہ آپ کی عمر ریٹائرمنٹ سے زیادہ ہو گئی ہے اور آپ سے ریٹوری بنتی ہے۔ جس پر سائل نے سروس بک وغیرہ کا جائزہ لیا تو علم ہوا کہ سروس بک میں سائل کی تاریخ پیدائش کے ساتھ کنگ / Tempering کی ہوئی ہے۔

(۳) یہ کہ سائل کی درست تاریخ پیدائش بمطابق میونل و کپیوٹرائزڈ شناختی کارڈ 1967ء ہے۔ (اقل شناختی کارڈ الف ہے)۔

(۴) یہ کہ سائل کو جاری کردہ لیٹر نمبری 40-11638 محررہ 27.12.2022 سراسر غلط، خلاف قانون ہے۔ کیونکہ سائل کو لیٹر مذکور جاری کرنے سے قبل کوئی شنوائی کا موقع فراہم نہیں کیا گیا اور نہ ہی سائل کو اس غلط اندراج کی نسبت آگاہ کیا گیا۔ (نقل لیٹر الف ہے)۔

(۵) یہ کہ سائل نے باضابطہ طور پر MS صاحب کو درستی کی نسبت درخواست بھی گزاری لیکن کوئی شنوائی نہ ہو سکی۔ بلکہ آپ جناب کے پاس اپیل دائر کرنے کی ہدایت ہوئی۔

(۶) یہ کہ سائل ایک غریب گھرانے سے تعلق رکھتا ہے اور مہنگائی کے اس دور میں قطعی طور پر ریٹائرمنٹ حاصل نہیں کرنا چاہتا اور نہ ہی ابھی سائل کی ریٹائرمنٹ کی عمر پوری ہوئی ہے سائل اپنی سروس مکمل کر کے بعد از تکمیل سروس ریٹائرمنٹ حاصل کریگا۔ محکمہ کی جانب سے سائل کو Technicalites کی بنیاد پر ملازمت سے ریٹائرمنٹ کرنا سراسر غلط اور خلاف قانون ہے۔

سائل سروس ریکارڈ میں درستگی کا مستدعی ہے۔

- (۷)۔ یہ کہ آرڈر مذکور غلط، خلاف قانون ہونے کے حقوق سائل پر کالعدم باطل ہے اور قابل منسوخ ہے۔
- (۸)۔ یہ کہ سائل نے اپنے نام درستگی کی نسبت عدالت سول جج مانسہرہ کے پاس ایک مقدمہ دائر کیا تھا جو بھی سائل نے واپس لے لیا ہے۔ اس دوران ریکارڈ اکاؤنٹ آفس کے ملاحظہ سے پتہ چلا کہ وہاں سائل کی تاریخ پیدائش 13.06.1966 اور ولدیت غلام جیلانی درج ہے۔ حالانکہ سائل کی درست تاریخ پیدائش 1967 اور درست ولدیت کالا خان ہے۔ مذکورہ غلطی محکمہ کی ہے جس میں سائل کی کوئی غفلت شامل نہ ہے۔ (نقل لف ہے)۔
- (۹)۔ یہ کہ سائل نے قبل ازیں مورخہ 10.01.2023 کو بھی اپیل دائر کی تھی لیکن تا حال سائل کی اپیل پر کوئی شنوائی نہیں ہوئی اور نہ ہی آرڈر جاری ہوا ہے۔
- (۱۰)۔ یہ کہ اگر سائل کی اپیل منظور نہ کی گئی اور آرڈر نمبر 11638 مصدرہ 27.12.2022 کو منسوخ نہ فرمایا گیا تو سائل کو لامتناہی مقدمات کا سامنا کرنا پڑے گا اور مزید مشکلات سے دوچار ہوگا۔
- لہذا استدعا ہے کہ آرڈر نمبر 11638 مصدرہ 27.12.2022 کو کالعدم و منسوخ فرمایا جا کر سائل کو ملازمت پر بحال فرمایا جائے۔

عبوری ریپیف:

مزید برآں استدعا کی جاتی ہے کہ تافصلہ اپیل MS صاحب کو ہدایت فرمائی جائے کہ وہ سائل کی تنخواہ بند کرنے، ڈیوٹی سے روکنے یا سائل کے خلاف تادیبی کارروائی کرنے سے ابداً باز ہیں۔

الرقوم 03.04.2023

گلزار ولد کالا خان ساکنہ شنکیاری تحصیل و ضلع مانسہرہ..... سائل

دورڈاردی متعینہ KATH مانسہرہ  
موبائل نمبر:.....

سائل سروس ریکارڈ میں درستگی کا مستدعی ہے۔

- (۷)۔ یہ کہ آرڈر مذکور غلط، خلاف قانون ہونے کے حقوق سائل پر کالعدم باطل ہے اور قابل منسوخ ہے۔
- (۸)۔ یہ کہ سائل نے اپنے نام درستگی کی نسبت عدالت سول جج مانسہرہ کے پاس ایک مقدمہ دائر کیا تھا جو بھی سائل نے واپس لے لیا ہے۔ اس دوران ریکارڈ اکاؤنٹ آفس کے ملاحظہ سے پتہ چلا کہ وہاں سائل کی تاریخ پیدائش 13.06.1966 اور ولدیت غلام جیلانی درج ہے۔ حالانکہ سائل کی درست تاریخ پیدائش 1967 اور درست ولدیت کالا خان ہے۔ مذکورہ غلطی محکمہ کی ہے جس میں سائل کی کوئی غفلت شامل نہ ہے۔ (نقل لف ہے)۔
- (۹)۔ یہ کہ سائل نے قبل ازیں مورخہ 10.01.2023 کو بھی اپیل دائر کی تھی لیکن تاحال سائل کی اپیل پر کوئی شنوائی نہیں ہوئی اور نہ ہی آرڈر جاری ہوا ہے۔
- (۱۰)۔ یہ کہ اگر سائل کی اپیل منظور نہ کی گئی اور آرڈر نمبر 11638 مصدرہ 27.12.2022 کو منسوخ نہ فرمایا گیا تو سائل کو لامتناہی مقدمات کا سامنا کرنا پڑے گا اور مزید مشکلات سے دوچار ہوگا۔
- لہذا استدعا ہے کہ آرڈر نمبر 11638 مصدرہ 27.12.2022 کو کالعدم و منسوخ فرمایا جا کر سائل کو ملازمت پر بحال فرمایا جائے۔

عبوری ریپٹ:

مزید برآں استدعا کی جاتی ہے کہ تافصلہ اپیل MS صاحب کو ہدایت فرمائی جائے کہ وہ سائل کی تنخواہ بند کرنے، ڈیوٹی سے روکنے یا سائل کے خلاف تادیبی کارروائی کرنے سے ابداً باز رہیں۔

المرقوم 03.04.2023

گلزار ولد کالا خان سا کہہ شکلیاری تحصیل ضلع مانسہرہ..... سائل

درڈاردلی متعینہ KATH مانسہرہ  
موبائل نمبر:.....

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Government of Khyber Pakhtunkhwa  
District Accounts Office Manshra  
Monthly Salary Statement (November-2022)

Annexure

"G"



Personal Information of Mr GULZAR d/w/s of GHULAM JILANI

Personnel Number: 00282307 CNIC: 1350301371711  
Date of Birth: 13.06.1966 Entry into Govt. Service: 03.10.1989

NTN:

Length of Service: 33 Years 01 Months 029 Days

Employment Category: Active Permanent

Designation: WARD ORDERLI

80814298-GOVERNMENT OF KHYBER PAKH

DDO Code: MA4362-MS District Head Quarter Hospital Mansehra

Payroll Section: 001

GPF Section: 005

Cash Center:

GPF A/C No: IVJMATD2769

Interest Applied: Yes

GPF Balance:

223,110.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 05

Pay Stage: 28

Wage type		Amount	Wage type		Amount
0001	Basic Pay	36,230.00	1001	House Rent Allowance 45%	2,255.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	522.00	2199	Adhoc Relief Allow @10%	362.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Dispr. Red All 15% 2022KP	3,639.00
2347	Adhoc Rel Al 15% 22(PS17)	3,639.00			0.00

## Deductions - General

Wage type		Amount	Wage type		Amount
3005	GPF Subscription	-890.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-67.00	4004	R. Benefits & Death Comp:	-450.00

## Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
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## Deductions - Income Tax

Payable: 803.68 Recovered till November-2022: 335.00 Exempted: 0.04 Recoverable: 468.72

Gross Pay (Rs.): 52,679.00 Deductions: (Rs.): -2,607.00 Net Pay: (Rs.): 50,072.00

Payee Name: GULZAR

Account Number: 7220-3

Bank Details: NATIONAL BANK OF PAKISTAN, 230364 MAIN BRANCH MANSEHRA MAIN BRANCH MANSEHRA, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: MANSEHRA

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email:





