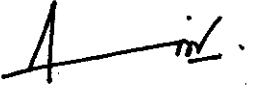


# FORM OF ORDER SHEET

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

**Appeal No.** 1368/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/06/2023	<p>The appeal of Mr. Noorul Wahab presented today by Mr. Shabir Shah Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on</p>
		<p>By the order of Chairman</p>
		
		<p>REGISTRAR</p>

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

Service Appeal No. 1368 of 2023

Noorul Wahab

... Appellant

**VERSUS**

Government of KP and others.

... Respondents

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S#	Description of documents	Annexure	Pages
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4.	Memo Of Addresses	.....	9
5.	Copy of CNIC and Service record of the appellant	A	10-15
6.	Copy of Notice dated 25.03.2022	B	16-
7.	Copies of the Office order No. 1771/DHO/SH dated: 01.04.2022, candidates and DPC members' attendance sheets, dated 11.04.2022	C	17-19
8.	Copy of the minutes of the meeting of the DPC dated 11.04.2022	D	20
9.	Copies of adjustment order bearing No. 1946-54/DHO/Sh/PF dated 13.04.2022 along with other relevant documents including the pay slip	E	21-24
10.	Copy of transfer Office Order dated: 20.01.2023 of respondent No.4	F	25
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12.	Copy of Departmental Appeal	H	27-29
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APPELLANT

Through Counsels

Off: S.8,9 2<sup>nd</sup> Floor, Continental  
Plaza, Makanbagh, Mingora,  
District Swat.  
Cell No: 03005746744, 03339491110

  
**SABIR SHAH**  
ADVOCATE SUPREME COURT

  
**AFTAB HUSSAIN BUTT**  
ADVOCATE HIGH COURT

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

Service Appeal No. 1368 of 2023

Noorul Wahab S/O Abdul Maujood (Ex-Sanitary Inspector) R/O  
Lilonai, Tehsil Alporai, District Shangla.

... Appellant

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa at Peshawar.
2. Director General Health Services, Government of Khyber Pakhtunkhwa at Peshawar.
3. The District Health Officer District Shangla, At Alporai.
4. Muhammad Ibrahim (Sanitary Inspector) DHO Office Shangla.

... Respondents

**SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL  
ACT, 1974,**

**Prayer:**

On acceptance of this service appeal, the impugned order No. 851-58/DHO/SH dated 20.02.2023 of Respondent No.3 whereby the appellant has been transferred and relieved from performing his duties as Sanitary Inspector BPS.14, may kindly be declared null and void upon the rights of the appellant, be struck down and the respondents may please be directed to restore the appellant on the post of Sanitary Inspector with all back benefits.

Any other relief not specifically prayed but this august Tribunal deems proper may also be granted.

Respectfully Sheweth:

1. The appellant, being a bona fide resident of Lilonai, District Shangla, has diligently and satisfactorily served in the

Health Department since 15.06.1998, demonstrating unwavering dedication and commitment to his duties, as recognized by his high ups. **(Copy of CNIC and Service record of the appellant is annexed as Annexure "A")**

2. That, on 25.03.2022, Respondent No.2 issued a notice inviting applications for the purpose of filling the newly created post of Sanitary Inspector BPS.14. This invitation was specifically extended to in-service candidates belonging to the Paramedics category, encompassing individuals from the Pharmacy and PHC fields (Pharmacy & PHC). The selection process for this position was to be determined based on Seniority cum Previous Record evaluations. **(Copy of Notice dated 25.03.2022 is annexed as Annexure "B")**
3. That the appellant being qualified and suitable candidate for the same applied for the subject post along with other four candidates.
4. That a Departmental Promotion Committee ("DPC") was constituted under the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989 vide Office order No. 1771/DHO/SH dated: 01.04.2022 for adjustment of suitable candidate against the post of Sanitary Inspector from amongst the candidates who submitted their applications on 11.04.2022 and appeared before the DPC on the even date. **(Copies of the Office order No. 1771/DHO/SH dated: 01.04.2022, candidates and DPC members' attendance sheets, dated 11.04.2022 are annexed as Annexure "C")**
5. That, after fulfilling all necessary formalities, the DPC concluded its evaluation process and recommended the appellant for appointment to the subject post. The appellant's recommendation was based on his seniority and demonstrated efficiency in his previous service. **(Copy of the minutes of the meeting of the DPC dated 11.04.2022 is annexed as annexure "D")**

6. That the respondent No.3 issued the adjustment order bearing No. 1946-54/DHO/Sh/PF dated 13.04.2022 of the appellant against the post of Sanitary Inspector BPS.14 after receiving the recommendation of the DPC and permission/approval of respondent No.2. **(Copies of adjustment order bearing No. 1946-54/DHO/Sh/PF dated 13.04.2022 along with other relevant documents including the pay slip on the subject post are annexed "E")**.
7. That, after assuming the charge and carrying responsibilities of the newly appointed position, the appellant diligently performed his duties with utmost dedication and commitment, satisfying the expectations of his superiors. However, during this period, a personnel named Muhammad Ibrahim, (Respondent, No.4, herein) who held the position of PHC Tech. (MP) BPS.12 at BHU Dehrai, underwent a transfer and was subsequently appointed as Sanitary Inspector. This transfer was carried out through Office Order No. 140-42/AE-VI dated 20.01.2023. **(Copy of transfer Office Order dated: 20.01.2023 of respondent No.4 is annexed as Annexure "F")**
8. That, the appellant who was already working as Sanitary Inspector was directed by respondent No.3, vide order No.851-57/DHO/SH/ Dated: 20.02.2023 (*impugned herein*) to continue his duty at Civil Dispensary Lilownai against the vacant post of CT (Pharmacy), illegally and unlawfully directing him to move from his working post to ex-post. **(Copy of impugned order No.851-57/DHO/SH/ Dated: 20.02.2023 is annexed as Annexure "G")**
9. That the appellant assailed the impugned office Order No.851-57 /DHO/SH/ Dated: 20.02.2023 before the worthy Respondent No.2 which has not been responded in its statutory period, therefore the appellant having no other option but to file the instant service appeal before this Hon'ble Court in its statutory time limitation. **(Copy of Departmental Appeal is annexed as Annexure "H")**

10. That the impugned order dated: 20.02.2023 of Respondent No.3 is illegal, unlawful, against the record and are liable to be set aside, inter alia, on the following grounds:

**Grounds:**

- A. That, actions and inactions of respondents are illegal, ultra vires and against the established norms of administration, therefore, are not tenable in the eyes of law.
- B. That, the appellant has been treated in clear violation of the law, thereby constituting a stark and glaring example of discriminatory action. This prejudiced treatment inflicted upon the appellant not only undermines his fundamental rights but also stands in direct contradiction to the principles enshrined in the Constitution of the Islamic Republic of Pakistan, 1973 under its Articles 4, 25, and 27. The appellant firmly maintains that his rights, as guaranteed by the Constitution of the Islamic Republic of Pakistan, have been grossly disregarded, thereby warranting immediate redress through the present service appeal.
- C. That Respondent No.2 has blatantly violated the provisions of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules of 1989 (referred to as "APT Rules 1989") while making the adjustment of private Respondent No.4 to the post in question. The violations can be summarized as follows:
- a) **Respondent No.4's non-participation in the adjustment process:** Respondent No.4 did not actively participate in the adjustment process initiated by the competent authority. The adjustment of a candidate who did not partake in the prescribed selection procedures undermines the integrity and fairness of the entire process.

b) **Respondent No.4's seniority compared to other candidates:** It is brought to the attention of the authorities that Respondent No.4 holds the position of being the junior most among all the candidates. This contravenes the APT Rules 1989, which generally prioritize seniority as a determining factor in matters of appointment and adjustment.

c) **Reports of Respondent No.4's inefficiency and disobedience:** That Respondent No.4 has repeatedly been underreported by superiors due to their lack of efficiency and disobedience. These documented instances of poor performance and insubordination raise serious concerns regarding the suitability of Respondent No.4 for the post in question.

d) **Inquiries against Respondent No.4:** It is further revealed that inquiries have been conducted against Respondent No.4, which suggests a history of misconduct or inappropriate behavior. Such inquiries indicate a lack of professional conduct and cast doubt on the credibility and reliability of Respondent No.4's suitability for the appointed position.

Based on the irregularities and violations stated herein above, it is evident that Respondent No.2's decision to adjust Respondent No.4 to the post of Sanitary Inspector is in direct contradiction to the APT Rules 1989. The appellant contends that the adjustment should have been made in accordance with the established rules and regulations, considering factors such as active participation in the selection process, seniority, competence, and disciplinary record.

D. That the whole process followed in transferring and appointing Respondent No.4 as Sanitary Inspector was marred by a lack of procedural fairness, even the appellant was not given an opportunity to present his case or

challenge the decision, thereby depriving him of their right to due process.


- E. That the appointment of Respondent No.4 over the appellant, despite the appellant's seniority, efficiency, and satisfactory performance, reflects preferential treatment that lacks any reasonable or justifiable basis. This arbitrary decision-making process undermines the principles of meritocracy and fairness.
- F. That the impugned order was issued as a direct consequence of political pressure exerted on the decision-making process as Respondent No.4 enjoyed favored status as a result of being the "blue-eyed" individual of the respondents, indicating a biased and unfair influence in the decision-making process. Such undue influence compromises the principles of meritocracy, transparency, and equal opportunity, which are fundamental to a fair and impartial selection process.
- G. Any other ground not specifically raised will be argued with the prior permission of this August Court.

In view of the above, it is therefore very humbly prayed that, on acceptance of this service appeal, the impugned order bearing No. 851-57 /DHO/SH/ Dated: 20.02.2023 of respondent No.3 may kindly be declared null and void upon the fundamental rights of the appellant, be struck down and the respondents may please be directed to readjust the appellant against the post of Sanitary Inspector post with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

  
APPELLANT

Through Counsels

  
**SABIR SHAH**  
**Advocate Supreme Court**  
**Mingora Swat**

  
**AFTAB HUSSAIN BUTT**  
**ADVOCATE HIGH COURT**



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

Service Appeal No. \_\_\_\_\_ of 2023

Noorul Wahab

... Appellant

**VERSUS**

Government of KP and others.

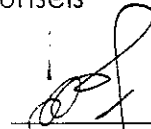
... Respondents

**Certificate**

As per instructions received from my client, it is certified that no such like service appeal against the impugned orders, has been earlier filed before this Hon'ble Court.

  
APPELLANT

Through Counsels



**SABIR SHAH**

ADVOCATE SUPREME COURT OF PAKISTAN



**AFTAB HUSSAIN BUTT,**  
ADVOCATE HIGH COURT

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

Service Appeal No. \_\_\_\_\_ of 2023

Noorul Wahab

... Appellant

**VERSUS**


Government of KP and others.

... Respondents

**Affidavit**

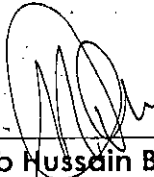
I, Noorul Wahab S/O Abdul Maujood R/O Lilonai, Tehsil Alporai, District Shangla, do hereby solemnly affirm and declares on oath that, all the contents of the accompanying **service appeal** are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld from this Hon'ble court.

Deponent

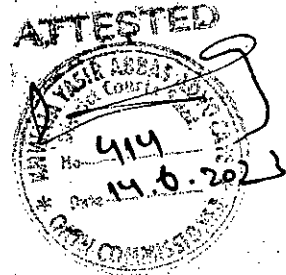


Noorul Wahab  
CNIC:

Identified By:



Aftab Hussain Butt  
Advocate High Court



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

Service Appeal No. \_\_\_\_\_ of 2023

Noorul Wahab ... Appellant

VERSUS

Government of KP and others. ... Respondents

**Address of Appellant:**

Noorul Wahab S/O Abdul Maujood R/O Lilonai, Tehsil Alporai, District Shangla

CNIC No:

Cell No.

**Addresses of Respondents:**

1. Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa at Peshawar.
2. Director General Health Services, Government of Khyber Pakhtunkhwa at Peshawar.
3. The District Health Officer District Shangla, At Alpurai.
4. Muhammad Ibrahim (Sanitary Inspector) DHO Office Shangla.

  
APPELLANT

Through Counsels



**SABIR SHAH**

ADVOCATE SUPREME COURT OF PAKISTAN



**AFTAB HUSSAIN BUTT,**

ADVOCATE HIGH COURT



7

16208

11

# SERVICE BOOK

PNO. 00204560

OF

Mr. Noorul Wahab  
JCT (Pharmacy)  
CD Mian Kalay,  
3

GS & PD. N.W.F.P. 498:PB ... 50,000 B. ... 12.8.95(4)  
Price: Rs. 15.00

WSD

  
District Health Officer  
Distt: Shangla

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

1. Name *Noorul Wahab*  
2. Race *Afghan*  
3. Residence *village 3 p. Lilonai Tehsil Alpurri  
Lilonai Distt. Shangla.*

4. Father's name and residence *Abdul Mansud (Late) of Lilonai  
Alpurri Shangla.*

5. Date of birth by Christian era as nearly as can be ascertained *14/5/1979* *14th May 1979*  
*Seventy nine*

6. Exact height by measurement *6 feet 0 inch*

7. Personal marks for identification

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

Little Finger	Ring Finger
Middle Finger	Fore Finger
Thumb	

9. Signature of Government Servant *Noorul Wahab*

10. Signature and designation of the Head of the Office or other Attesting Officer  
*Swagat Guliyada*

*Swagat Guliyada*  
*Swagat Guliyada*  
**District Health Officer**  
**Distt: Shangla**

Signature  
of the  
attesting  
officer

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant
Dispenser	R.P. No 6		R. 1440/-			15/6/98	M. Rulwaha
<del>1440-73-2535</del>							
do		7	R. 1512/-			1/12/98	FN
do			Rs. 1586/-			1/12/2000	FN

*[Signature]*  
District Health Officer  
Distt: Shangla

13322  
13322  
13322

No.	Designation of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment	Termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	and duration of leave taken	leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Service
						Period	Government to which debitable		
1									
2									
3									
4									
5									
6									
7		30/11/99		Annual Increment allowed				Service verified up to 30-11-99	
8	District Health Officer, Swat at Gulkada.			District Health Officer, Swat at Gulkada.				District Health Officer, Swat at Gulkada.	
9		30/11/2000		Annual Increment allowed				Service verified up to 30-11-2000	
10	District Health Officer, Swat at Gulkada.			District Health Officer, Swat at Gulkada.				District Health Officer, Swat at Gulkada.	

Appointed as Dispenser in P.S No. 62144-73-2535 in C.D. Division with D.O. No. 6349-46/ESM. Dated 10/6/98 and this Office No. 9634-37/A-5/PF dated 13/6/98. Arrived report on 15/6/98.

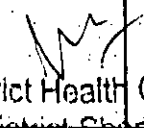
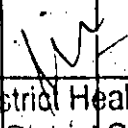
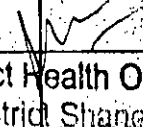

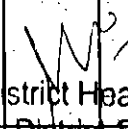
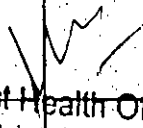
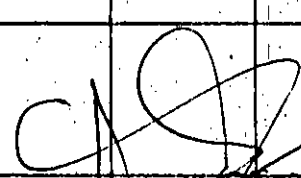

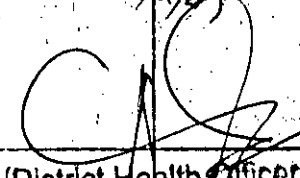
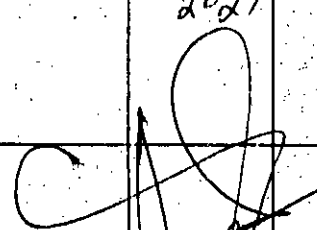
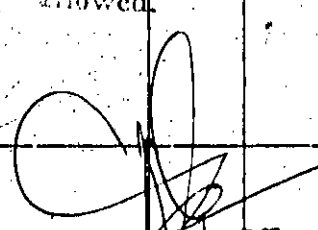
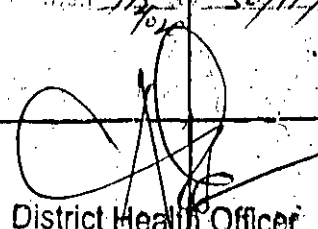
District Health Officer, Swat at Gulkada.

District Health Officer  
Distt: Shangla





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
		Departmental Pay Fixation in Revised Pay Scale No. 6 @ Rs. 2490... W.e.f 1-12-2001 vide FD (PRC) 1-1/2001 dated 27-10-2001 Pay In Existing Scale No. 6 on 30.11.2001 Rs. 1586. Annual increment in existing pay scale Rs. 73 Equal/Next Stage In Revised Pay Scale No. 6 @ Rs. 2490. 1 12/2001 FN. Pay Fixed on 1-12-2001,					
<i>Dispenser BPS 6</i> <i>(2160-110-5460)</i>			<i>Rs. 2600/-</i>			<i>1 12/2002 FN</i>	
		<i>Office of the Accountant General N. W. F. I Pay Fixation Party N. W. F. I Subjected to get attestation of qualification entry at page - 2 in SI B 2002 qualified Dispenser AD. 1 12/2002 FN</i>					
<i>DC9</i>			<i>Rs 2710/- PM</i>				

*[Signature]*  
District Health Officer  
Distt: Shangla

Signature and designation of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period	Government to which debitable		
	30 <sup>th</sup> 2018			Annual Increment allowed.				Service Verified w.e.f. 1/11/17 to 30/11/2018
 District Health Officer District Shangla			 District Health Officer District Shangla				 District Health Officer District Shangla	
	30 <sup>th</sup> 2019			Annual Increment allowed.				Service Verified w.e.f. 01/11/18 to 30/11/2019
 District Health Officer District Shangla			 District Health Officer District Shangla				 District Health Officer District Shangla	
	30 <sup>th</sup> 2020			Annual Increment allowed.				Service Verified w.e.f. 01/11/19 to 30/11/2020
 District Health Officer District Shangla			 District Health Officer District Shangla				 District Health Officer District Shangla	
	30 <sup>th</sup> 2021			Annual Increment allowed.				Service Verified w.e.f. 1/12/20 to 30/11/2021
 District Health Officer District Shangla			 District Health Officer District Shangla				 District Health Officer District Shangla	

Mr. Noor ul Makhid CT Pharmacy BPS-12 is hereby adjusted against the vacant post of Pharmacy Inspector BPS-14 in his own pay and scale vide this office order No. 1946-S4/DHO/SH/PE dt: 13/04/2022.

  
District Health Officer  
Dist: Shangla

  
District Health Officer  
Distt: Shangla

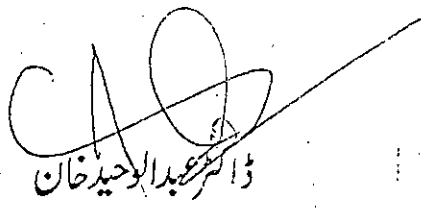
1 Reference to any Government Service or award or prize of the Government	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) Substantive appointment, or (ii) whether service is for non-regular work	4 Name of the person in whose place he is acting	5 Additional pay for officiating or other employment under the term "pay"	6 Date of Appointment	7 Signature of Government Servant
Sanitary Inspector			No. 44080/		7 1-2022	
to -			No. 4570/		12 2022	

*[Signature]*  
 District Health Officer  
 Distt: Shangla

نوٹس برائے ان سروسز کینڈیڈٹ پیرامیڈیکس کیلگری (فارمیسی، پی۔ ایچ۔ سی)

محکمہ صحت ضلع شانگلہ کے ان سروسز پیرامیڈیکس کیلگری (فارمیسی، پی۔ ایچ۔ سی ٹرینیشن) بیک سکیل 14 اور 12 سے سینٹری انسپکٹر BPS-14 کی خالی آسامی پرائیڈ جھنٹ کیلئے نوٹس ہذا کے ذریعے مطلع کیا جاتا ہے کہ مذکورہ کیلگری کے خواہشمند ان سروسز حضرات اس نوٹس کے 15 دن کے اندر اندر درخواستیں جمع کریں۔ نیز مذکورہ آسامی پرائیڈ جھنٹ کیلئے درخواستیں جمع کرنے والے ان سروسز امیدواروں میں سے سینٹری اور پچھلے سروسز ریکارڈ کو مد نظر رکھتے ہوئے اہل امیدوار کو ترجیح دی جائیگی۔

نوٹ: چونکہ درخواستیں صرف اور صرف ان سروسز امیدواروں سے مطلوب ہے اسلئے باقی اکیڈمک Documents وغیرہ جمع کرنے کی ضرورت نہیں ہے۔



ڈاکٹر امیر حید خان

ڈسٹرکٹ ہیلتھ آفیسر شانگلہ

مورخہ: 25.03.2022

  
District Health Officer  
Distt: Shangla



OFFICE OF THE  
DISTRICT HEALTH OFFICER  
DISTRICT SHANGLA AT ALPURAL.

☎- 0996- 850653 ☎- 0996- 850824  
E-mail: [pdohshangla@gmail.com](mailto:pdohshangla@gmail.com)

No. 1771 /DHO/SH

Dated: 07 /04/2022

Annexure

**OFFICE ORDER:**

The Departmental Promotion Committee under APT Rules 1989 is hereby constituted, with the following composition, for the task of processing of adjustment of suitable candidate with special reference to the newly created vacant post of "Sanitary Inspector" in health department district Shangla amongst the candidates who submitted applications for the mentioned post on (Monday) 11.04.2022.

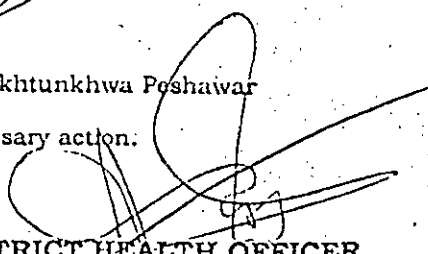
- 1- Dr. Abdul Waheed Khan, DHO Shangla.....Chairman
- 2- Dr. AbdusSamad Coordinator LHWs Program Shangla.....Member
- 3- Dr. Hazrat Bilal Acting MO/Coord: DHIS Program Shangla.....Member


  
DISTRICT HEALTH OFFICER  
SHANGLA

**Endst: No. & Date Even:**

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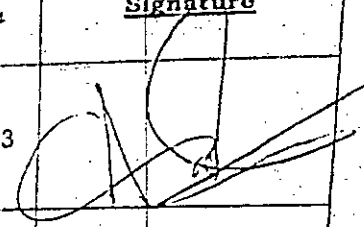
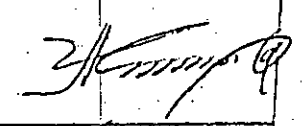
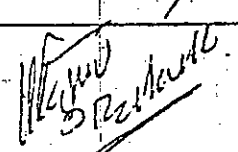
- 1- The Director General Health Services Khyber Pakhtunkhwa Peshawar
- 2- The Deputy Commissioner District Shangla.
- 3- The Above named committee members for necessary action.


  
DISTRICT HEALTH OFFICER  
SHANGLA

  
District Health Officer  
Distt: Shangla

Annex 18


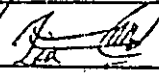
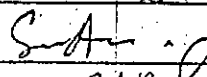
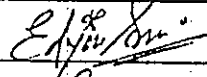
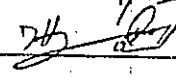
**ATTENDANCE SHEET OF DEPARTMENTAL Promotion COMMITTEE HEALTH  
DEPARTMENT SHANGLA (DHO SIDE) DATED 11/04/2022.**

<u>Sr</u>	<u>Name</u>	<u>Designation</u>	<u>Contact No.</u>	<u>Signature</u>
1.	Dr. Abdul Waheed Khan	DHO Shangla (Chairman)	0300-5794373	
2.	Dr. AbdusSamad	Coord: LHWs Program DHO Office, Shangla (Member)	0300-5755883	
3.	Dr. HazratBilal	MO/ Acting Coord: DHIS Program DHO Office, Shangla (Member)	0345-9458539	

  
District Health Officer  
Distt: Sha

~~ATTENDANCE SHEET~~  
19/04/22

**ATTENDANCE SHEET OF INSERVICE CANDIDATES WHO APPLIED FOR ADJUSTMENT AGAINST THE VACANT POST OF SANITARY INSPECTOR (BPS-14) HEALTH DEPARTMENT SHANGLA (DATED: 11.04.2022) (MONDAY)**

Sl. No.	Name	F/Name	Current Designation with Duty Station	ATTENDANCE/SIGNATURE
1	Noor ul Wahab	Abdul Maujood	CT Pharmacy at CD Lilownai	
2	Zia ur Rahman	Muhammad Kamil	PHC (MP)/EPI at CD Lilownai	
3	Sher ul Wahab	Abdul Maujood	PHC (MP)/EPI at RHC Karora	
4	Latif ur Rahman	Umar Dad	PHC (MP)/MT at RHC Karora	
5	Ziaullah	Muhammad Sardar	EPI Tech. at CD Lilownai	

  
District Health Officer  
Distt: Shangla

**MINUTES OF THE MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE HEALTH DEPARTMENT SHANGLA HELD ON 11.04.2022 FOR CONSIDERATION OF SANITARY INSPECTOR.**

In view of district need towards filling of vacant post of Sanitary Inspector in Health Department, District Shangla through adjustment. Applications have been invited from the interesting in-service candidates of Pharmacy & PHC service categories of paramedics. In response, total five (5) applications were received from the in-service officials of relevant categories of paramedics.


All the applicants were called for interview on 11.04.2022. Total three (03) candidates attended the interview and the interview have been taken from them by the Departmental Promotion Committee, formulated by the District Health Officer, Shangla, through office order No. 1771/DHO/SH dated 01/04/2022. The members who attended the meeting are:


- 1- Dr. Abdul Waheed Khan, DHO Shangla.....Chairman
- 2- Dr. AbdusSamad Coordinator LHWs Program Shangla.....Member
- 3- Dr. HazratBilal Acting MO/Coord: DHIS Program Shangla.....Member

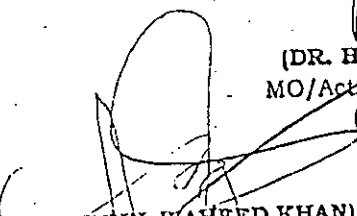
The total three candidates were interviewed where after the following position emerged:

S#	Name & address of the Candidate	D.O.B	Remarks
1.	Mr. NoorulWahab S/OAbdulMaujoodCT Pharmacy (BPS-12) attach to Civil Dispensary Lilownai District Shangla.	14.05.1979	Recommended for adjustment against the vacant post of "Sanitary Inspector (BPS-14)" in own pay & scale being senior and efficient towards delivery of services of public interest during the entire period of service.

As per the result of the interview, the Department Promotion Committee recommended the above official for adjustment against the mentioned vacant post in own pay and scale under the Khyber Pakhtunkhwa Civil Servants (appointment, promotion & transfer) rules, 1989.

  
(DR. ABDUS SAMAD)  
Coord: LHWs Program  
(Member)

  
(DR. HAZRAT BILAL)  
MO/Acting Coord: DHIS Program  
(Member)

  
(DR. ABDUL WAHEED KHAN)  
District Health Officer,  
Shangla (Chairman)

  
District Health Officer  
Distt: Shangla



Annexure

OFFICE OF THE  
DISTRICT HEALTH OFFICER DISTRICT  
SHANGLA AT ALPURAI

(21)

Ph-0996-850653

E-mail: edohshangla@gmail.com

Ph-0996-850824


No. 1946-54 /DHO/SH/PP

Dated: 13/04/2022

OFFICE ORDER:

Mr. Noor ul Wahab Clinical Technician (Pharmacy) BPS-12 attach to Civil Dispensary Lilownal District Shangla is hereby adjusted against the vacant post of Sanitary Inspector (BPS-14) in his own pay and scale and directed to perform duty at the office of the undersigned with immediate effect in the best public interest.

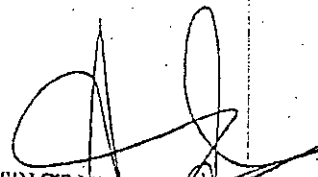
Arrival/Departure should be submitted for record.


  
DISTRICT HEALTH OFFICER  
DISTRICT SHANGLA

Endst: No. & Date Even:

Copy forwarded to:

- 1- Director General Health Services Khyber Pakhtunkhwa Peshawar.
- 2- Deputy Commissioner District Shangla.
- 3- In-charge Senior Medical Officer Civil Dispensary.
- 4- District Accounts Officer Shangla.
- 5- Divisional/District Monitoring Officer IMU Malakand-I.
- 6- Establishment & Accounts Section of this office.
- 7- HRMIS/DHIS Cell, DHO Office Shangla.
- 8- Above named official for compliance.
- 9- Personnel File.

  
DISTRICT HEALTH OFFICER  
DISTRICT SHANGLA

  
District Health Officer  
Distt: Shangla

CS CamScanner

CS CamScanner



OFFICE OF THE  
DISTRICT HEALTH OFFICER DISTRICT  
SHANGLA AT ALPURAI

(22)

☎- 0996-850853 E-mail: odohshangla@gmail.com ☎- 0996-850824

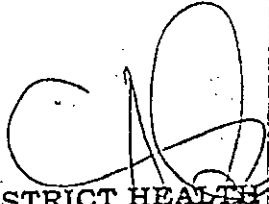
No. 228 /DHO/SH/PF

Dated: 19/04/2022

To,  
The Director General Health Services  
Khyber Pakhtunkhwa Peshawar.

Subject: REQUEST FOR PERMISSON OF OFFICE ORDER.

Madam:  
I have the honor to forward herewith this office order bearing No. 1946-54/DHO/SH/PF Dated 13/04/2022, regarding the adjustment of Mr. Noor ul Wahab Clinical Technician (Pharmacy) BPS-12 against the vacant post of Sanitary Inspector (BPS-14) in own pay and scale for the purpose of information and with recommendation of proper permission / approval in the greater public interest please, as the official concerned is experienced, competent, efficient and responsible towards his new assignment.

  
DISTRICT HEALTH OFFICER  
SHANGLA

  
District Health Officer  
Distt: Shangla

~~Annexure~~ H

**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to The Director, General Health Services Peshawar and not to any official by name

Office Ph: 091-92101691, Chanak: 091-9210187, 091-9210128 & 091-9210230

23

No. 10495 /AE.VI,

Dated Peshawar the 6/1/2022

To  
The District Health Officer  
Shangla.

Subject: REQUEST FOR PERMISSION OF OFFICE ORDER

Reference to your letter No. 2218/DHO/SH/PF dated 19.04.2022 on the subject noted above.

Please decide the case at your own level being competent authority.

DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES, KP PESHAWAR

District Health Officer  
Distt. Shangla

H/2

(24)

Shangla

S#:1140

P Sec:001 Month:December 2022

SH4625 -District Health Officer (T

Pers #: 00204560 Buckle:

DISTRICT HEALTH OFFICER (

Name: NOORUL WAHAB

NTN:

SANITARY INSPECTOR (MP)

GPF #:

CNIC No.1730193095729

Old #:

GPF Interest Applied

12 Active Temporary

SH4625 -

PAYS AND ALLOWANCES:

0001-Basic Pay	45,510.00
1001-House Rent Allowance 45%	2,940.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1911-Compen Allow 20% (1-15)	1,000.00
1985-Health Professional Allow	15,000.00
1148-15% Adhoc Relief All-2013	557.00
2199-Adhoc Relief Allow @10%	405.00
2341-Dispr. Red All 15% 2022KP	4,446.00
Gross Pay and Allowances	78,660.00

DEDUCTIONS:

IT Payable	4,520.40	Deducted	4,344.00	TAX:(3609)	754.00
GPF Balance	479,538.00	Subrc:	2,620.00		
3501-Benevolent Fund			1,200.00		
4004-R. Benefits & Death Comp:			600.00		

Total Deductions 5,174.00

73,486.00

D.O.B LFP Quota:

14.05.1979 NATIONAL BANK OF PAKNBP ALPURA SHANGLA

24 Years 06 Months 020 Days PLS000000007098

*[Signature]*  
District Health Officer  
Distt: Shangla



**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services Peshawar  
and not to any official by name E-Mail Address K.P.Kdhs@yahoo.com  
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 9910230

25  
Anberu  
F3

DHO Shangla

Dairy No 157

Date 27/01/23

**OFFICE ORDER**

As approved by the Competent Authority, Mr. Muhammad Ibrahim PHC Technician (MP) BPS-12, attached to BHU Dheri District Shangla is hereby transferred and posted against the vacant post of Sanitary Inspector (BPS-14) at DHO Office Shangla in his own pay & scale in the best public interest with immediate effect.

NB: Arrival/Departure reports should be submitted to this Directorate for record.

Sd/xxxxxxx  
Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar

No. 140-42 /AE-VI

Dated Peshawar the: 20/01/2023

Copy forwarded to the:

1. District Health Officer, Shangla.
2. District Account Officer, Shangla.
3. Official concerned.

For information and necessary action.

Add: Director General (HRM)  
Directorate General Health Services,  
Khyber Pakhtunkhwa, Peshawar

20/01/2023

District Health Officer  
Dist: Shangla



(26) Annexure 26

**OFFICE OF THE  
DISTRICT HEALTH OFFICER DISTRICT  
SHANGLA AT ALPURAI**

☎ 0996-850653	E-mail: edohshangla@gmail.com	☎ 0996-850824
---------------	-------------------------------	---------------

No. 851-57 /DHO/SII/

Dated: 20/02/2023

To,

- 1- Mr. Muhammad Ibrahim PHC Tech. (MP)/MT BHU Dehrai.
- 2- Mr. Noor ul Wahab CT Pharmacy/Sanitary Inspector Health Deptt Shangla.

Subject: **APPLICATION.**

Memo:

With reference to the Additional Director General (HRM) Directorate General Health Services Khyber Pakhtunkhwa office letter bearing No. 880/AE-VI Dated 17.02.2023 in response of this office letter No. 523-24/DHO/SH/PF Dated 30.01.2023, pertaining to DGHS KP office order No. 140-42/AE-VI Dated 20.01.2022.

You both the officials of health department Shangla is hereby directed for information and necessary action as per following paras:

- 1- You Mr. Muhammad Ibrahim PHC Tech. (MP).MT (BPS-12) attach to BHU Dehrai is hereby directed to perform duty as Sanitary Inspector (BPS-14) in own pay and scale against S. No. 02 in health department Shangla.
- 2- While you Mr. Noor ul Wahab Clinical Technician (Pharmacy) (BPS-12) working as Sanitary Inspector Health Department Shangla is hereby directed to continue your duty at Civil Dispensary Lilownai against the vacant post of CT (Pharmacy).


Submitted for information and compliance.

  
**DISTRICT HEALTH OFFICER  
SHANGLA**

**Endst: No. & Date Even:**

Copy is forwarded for information to:

- 1- The Director General Health Services Khyber Pakhtunkhwa w.r to his office letter number quoted above.
- 2- The District Accounts Officer Shangla.
- 3- The Establishment / Accounts Section of this office.
- 4- The In-charge BHU Dehrai & CD Lilownai.
- 5- The DHIS/HRMIS Cell Shangla.

  
District Health Officer  
Distt: Shangla

  
**DISTRICT HEALTH OFFICER  
SHANGLA**

To

The Director General Health Khyber Pakhtunkhwa

At Peshawar.

Through proper channel

**SUBJECT. Appeal against the irregular transfer order No 851-57 dated 20-2-2023 issued by DHO Shangla**

**Prayer: Cancellation of transfer order subject above order and restore the appellant to perform his duties as previously.**

Respected Sir,

The applicant is draw your kind attention for the cancellation of transfer order on the following factual grounds.

1. That the applicant is serving the health department since 15/06/1998 with unblemished service history.
2. That the DHO Shangla publicized a post of sanitary inspector through written notice on 25-03-2022 wherein the appellant along with other four candidates applied for the subject post. Copy of the public notice and list of candidates are attached as annexure A & B.
3. That after collection of application the DHO Shangla constituted a committee vide order No 1771 dated 1/04/2022 to conduct all the process to select a candidate amongst the applied candidates. Annexure C.
4. That the aforementioned committee after completion of all codal formalities recommended selection/adjustment of the appellant being senior most and eligible amongst the candidates. Copy of the minutes of the committee and scroll of attendance are attached as annexure D & E.
5. That after receiving the recommendation of the subject committee the DHO Shangla sent the recommendation to your good self for issuance of order vide No 2218 dated 19/04/2022. Copies of the referred letters are attached as annexure F.
6. That the DHO Shangla issued the adjustment order of the applicant vide No 1946-54 dated 13/04/2022 while the competency of the DHO endorsed by your god self

vide No 10495 dated 07/07/2022 with the direction that DHO is competent for issuance of the order which made already while properly entries made in the service book and pay roll of the appellant. Annexure G&H, H 1, H 2.

7. That the appellant performed his duties with honesty, with devotion and efficiently so far.

8. That one Mr Muhammad Ibrahim PHC Technical(MP) BPS 12 BHU Derai being junior most influenced the department politically as neither he was applied for this very post and nor deserved on the requisite criteria and your good self-issued his order vide No 140-42 dated 20-01-2023 against the vacant post but due to non-availability of post the DHO Shangla replied vide No 523-24 dated 30/01/2023 that the post is already filled up and one Mr Noorul Whab is working against the subject post. Copies of the referred letters are attached as annexure I&J.

9. That Mr Muhammad Ibrahim has under reported time and again by the superiors due to insubordination and inefficiency while inquiries conducted against him.

10. That Mr Muhammad Ibrahim continuously influenced illegally the department politically and once again your good self-issued letter No 880 dated 17-02-2023 wherein directed the DHO Shangla to relieve the appellant without any justification and legal grounds. The DHO Shangla resultantly issued adjustment order of Muhammad Ibrahim vide No 851-57 dated 20-02-2023 unlawfully and in the result of political pressure of the undeserving candidate. Annexure K&L.

11. That the political influence as per section 3 of Civil Servant Act 1973 attempt to bring political or outside influence directly or indirectly in transfer is illegal that's why the applicant observed the rules and never influenced the department politically or otherwise. The appellant is duty bound to respect his seniors.

12. That the DHO Shangla is utterly disregarded his own rules and procedure. The impugned transferee is the most junior than the appellant. Resultantly the impugned transfer is golden eggs for their favorite and swords for the appellant.

13. That the equal protection of law to ensure the elimination of all forms of exploitation according to the essence of constitution and every citizen has right to be treated equal but not observed in my case.

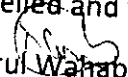


14. That policy of seniority is the main spirit of all the transfers policies in vogue and just after 11 months the relieving of the appellant is highly injustice and unlawful. This will be violation of rules and infringed upon the rights of the appellant which cut the very roots of civil service efficiency and downgrading of missionary zeal.

15. That justice is the fundamental, legal and basic right of the applicant and presently the applicant has only hope in appeal for doing justice and restoration of the appellant order.

16. That the Govt has already imposed ban on all kinds of transfers and posting vide dated January 22, 2023 resultantly your good self also publically circulated the notice that all kinds of transfers and postings are banned in the result. Hence utterly disregarded his own order Copies of the referred letters are attached as annexure

In the light of the above facts, grounds and policies in vogue, it is therefore, requested that on acceptance of this appeal the impugned order may be cancelled and the applicant may be restored on his post.

  
Noorul Wahab

Sanitary inspector

District Shangla.

Dated 21-02-2023



OFFICE OF THE  
DISTRICT HEALTH OFFICER DISTRICT  
SHANGLA AT ALPURAI

Annexure  
O/R  
30

☎- 0996- 850653	E-mail: edohshangla@gmail.com	☎- 0996- 850824
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No. 523-24 /DHO/SH/PF

Dated: 30 /01/2023

To,

The Director General Health Services  
Khyber Pakhtunkhwa Peshawar.

Subject: **APPLICATION.**  
R/Sir,

I have the honor to forward herewith an application alongwith enclosures submitted by Mr. Noor ul Wahab CT Pharmacy attach to Health Department Shangla vide this office Diary No. 169 Dated 30.01.2023, pertaining to the transfer/posting order of Mr. Muhammad Ibrahim PHC Technician (MP) BPS-12 attach to BHU Dehrai District Shangla against the post of Sanitary Inspector (BPS-14), vide Addl: Director General (HRM) Directorate General Health Services Khyber Pakhtunkhwa Peshawar Endorsement No. 140-42/AE-VI Dated Peshawar the 20/01/2023.

However, keeping in view the above it is stated that:

- 1- Health Department Shangla have only position of Sanitary Inspector (BPS-14) under DDO SH-4620 (Cat-D Hospital Besham) and already fill as the applicant i.e Mr. Noor ul Wahab CT Pharmacy is working on mentioned position in own pay and scale since April 2022, already in notice of your good office vide Director (HRM) DGHS office letter No. 10495/AE.VI Dated Peshawar the 07.07.2022.

Therefore in view of the above your good office has requested to guide us into the matter please.

  
DISTRICT HEALTH OFFICER  
SHANGLA

**Endst: No. & Date Even:**

Copy is forwarded for information to the Additional Director General Health Services Khyber Pakhtunkhwa w.r to his order number quoted above.

  
DISTRICT HEALTH OFFICER  
SHANGLA

  
District Health Officer  
Distt: Shangla

Annexure 15

31

# DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR



E-Mail Address: [dgsh@shyaboo.com](mailto:dgsh@shyaboo.com) Office Ph# 091-9210269 Fax# 091-9210187, 9210196 Ecell# 091-9210230  
No. 880 /AE-VI Dated: 17/12/2023

To,

The District Health Officer  
Shangla;

Subject: APPLICATION  
Memo.

Reference to your office letter No. 523-24/DHO/SH/PF dated 30.01.2023 on the subject noted above.

The matter has been considered and you are directed to relieve Mr. Noor ul Wahab C.T Pharmacy from the post of Sanitary Inspector.

ADDITIONAL DG (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

17/12/23

District Health Officer  
Distt: Shangla

32

**ELECTION COMMISSION OF PAKISTAN**  
**NOTIFICATION**

Islamabad the 22<sup>nd</sup> January, 2023

F.No.2(1)/2023-Cord.- WHEREAS, the Provincial Assemblies of Punjab and Khyber Pakhtunhwa under Article 112 of the Constitution of the Islamic Republic of Pakistan stand dissolved on 14<sup>th</sup> and 18<sup>th</sup> January, 2023 respectively.

**AND WHEREAS,** the Election Commission of Pakistan is mandated with the constitutional duty to organize and conduct elections in terms of Article 218(3) of the Constitution and to make such arrangements as are necessary to ensure that the elections are conducted honestly, justly, fairly and in accordance with the law and that corrupt practices are guarded against.

**AND WHEREAS,** it has become imperative that the Election Commission shall take all necessary steps under the Constitution and prevalent law for smooth conduct of General Elections to the Provincial Assemblies of Punjab and Khyber Pakhtunhwa

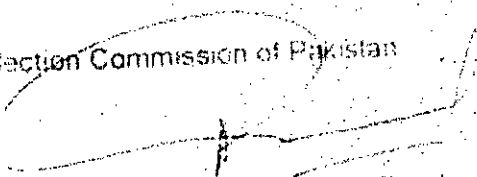
**NOW THEREFORE,** in exercise of the powers conferred upon it under Articles 218(3), 220 of the Constitution of the Islamic Republic of Pakistan, Sections 4, 5, 8(a) read with Section 230 of the Elections Act, 2017 and as supported by the Workers Party of Pakistan and 2 others reported in PLD 2012 SC 681, and all the other powers enabling it in that behalf, the Election Commission of Pakistan, to ensure transparent election and to provide a level playing field for all contesting candidates and political parties, hereby directs the Caretaker Governments of Punjab and Khyber Pakhtunhwa -

- (a) To assist the Election Commission to hold elections in accordance with law as provided under section 230(1)(b) of the Elections Act, 2017.
- (b) To ensure the compliance of all the notifications, directives and the provisions as laid down in Section 230 of the Act *ibid*.
- (c) Not to post or transfer any public official after the issuance of this notification within and to / from Punjab & Khyber Pakhtunhwa without prior approval in writing of the Election Commission as laid down in Clause 2(i) of Section 230 of the Elections Act, 2017.
- (d) Ensure that all kinds of recruitments in any Ministry, Division, Department or Institution under the Provincial Governments and Local Governments of Punjab and Khyber Pakhtunhwa are banned with immediate effect, except recruitments by the Provincial Public Service Commissions and those government organizations where test / interviews have already been conducted before this day.
- (e) Not to announce / execute any kind of Development Schemes in Punjab and Khyber Pakhtunhwa Provinces except those which are ongoing and approved before the issuance of this notification. Moreover, the Provincial Governments and Local Governments of Punjab and Khyber Pakhtunhwa shall not issue tenders of such schemes till culmination of General Elections of both Assemblies

Contd. Page-2

- (f) All development funds relating to Local Government institutions of Punjab and Khyber Pakhtunkhwa and Cantonment Boards falling in the jurisdiction of Punjab and Khyber Pakhtunkhwa shall stand frozen with immediate effect till announcement of results of the said General Elections.
- (g) To ensure immediate termination of services of all heads of the institutions appointed on political basis and to send their lists to the Commission forthwith.
- (h) To ensure vacation of the government residential facilities from Ex-Chief Ministers and their advisors, Ex-Provincial Ministers and Ex-Members of the Provincial Assemblies of Punjab and Khyber Pakhtunkhwa, besides ensuring withdrawal of official vehicles from them. Furthermore, the dignitaries shall be provided security / protocol as per their entitlement and any extra deployment of security / protocol be withdrawn from them forthwith.
- (i) The Caretaker Governments shall perform their functions and attend to day-to-day matters which are necessary to run the affairs of the Provinces in accordance with law.
- (j) The Chief Minister or a Minister or any other member of Caretaker Governments shall, within three days from the date of assumption of office, submit to the Commission, a statement of assets and liabilities including assets and liabilities of his spouse and dependent children as on the preceding 30<sup>th</sup> day of June on Form B.

This issues with the approval of Election Commission of Pakistan

  
(Omar Hamid Khan)  
Secretary  
Election Commission of Pakistan

Copy forwarded for information to the

- (1) Secretary to the President, Anwar-e-Sadiq, Islamabad
- (2) Secretary to the Prime Minister, Prime Minister's Secretariat, Islamabad
- (3) Secretary, Ministry of Parliamentary Affairs, Govt. of Pakistan, Islamabad
- (4) Secretary, Ministry of Interior, Government of Pakistan, Islamabad
- (5) Secretary, Ministry of Planning, Development and Reform, Government of Pakistan, Islamabad (for implementation and circulation to all relevant Departments)
- (6) Secretary, Senate Secretariat, Islamabad
- (7) Secretary, National Assembly of Pakistan, Islamabad
- (8) Secretary, Ministry of Defence, Government of Pakistan, Rawalpindi
- (9) Secretary, Establishment Division, Government of Pakistan, Islamabad (for implementation and circulation to all concerned)
- (10) Principal Secretary to the Governor, Punjab, Lahore
- (11) Principal Secretary to Chief Minister of Punjab, Lahore
- (12) Chief Secretary, Government of Punjab, Lahore
- (13) Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar
- (14) Registrar, Supreme Court of Pakistan, Islamabad
- (15) Registrar, Lahore High Court, Lahore
- (16) Registrar, Peshawar High Court, Peshawar
- (17) Provincial Election Commissioner Punjab, Lahore
- (18) Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar
- (19) Inspector General of Police, Punjab, Lahore
- (20) Inspector General of Police, Khyber Pakhtunkhwa, Peshawar

The undersigned is hereby directed to all concerned Departments

ii. Copy also forwarded to the:

- (1) Director General (Law)
- (2) Director General (IT, Policy & Planning)
- (3) Additional Director General (Training)
- (4) Additional Director General (GSI)
- (5) Additional Director General (Elections-II)
- (6) Principal Staff Officer to Hon'ble CEC
- (7) Director to Hon'ble CEC
- (8) Director (Elector Rolls)
- (9) Director (MIS)
- (10) Director (Political Financial)
- (11) Director (MCI)
- (12) Deputy Director (Budget)
- (13) Deputy Director (Election I & II)
- (14) Deputy Director (Genfd)
- (15) Deputy Director (Political Financial)
- (16) Deputy Director (Training)
- (17) Deputy Director (Web)
- (18) Deputy Director (Law)
- (19) PS to Hon'ble Members - I, II, III & IV
- (20) Staff Officer to Secretary
- (21) Assistant Director (Monitoring)
- (22) PS to Additional Secretary (Admin)
- (23) JPA to Special Secretary (ECP)

ECR Secretariat, Islamabad

*(Signature)*  
 Additional Director General  
 (Elections)

# نوٹس / اطلاع عام

سہیلیکیشن کمیشن آف پاکستان کے ہدایات کے روشنی میں خیبر

پختونخواہ کے موجودہ حکومت نے تبادلے (Transfer)

اور تعیناتی (Posting) پر عارضی پابندی لگادی ہے۔ لہذا محکمہ

صحت کے تمام ملازمین کو مطلع کیا جاتا ہے کہ تبادلے

(Transfer) اور تعیناتی (Posting) کے لئے تاحکم ثانی

دفتر ہذا التشریف لانے کی زحمت نہ کریں۔

بحکم

Daily info time

ڈائریکٹر جنرل ہیلتھ سروسز،  
خیبر پختونخواہ پشاور



OFFICE OF THE  
DISTRICT HEALTH OFFICER DISTRICT  
SHANGLA AT ALPURAI

☎- 0998- 850853	E-mail: edonshangla@gmail.com	☎- 0998- 850824
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No. 924 /DHO/SII/

Dated: 22 /02/2023

To,

The Director General Health Services  
Khyber Pakhtunkhwa Peshawar. ~~Main~~

Subject:

APPEAL.

I have the honor to forward herewith the subject cited self explanatory application 03 pages in original submitted by Mr. Noor ul Wahab CT Pharmacy (BPS-12) Health Department Shangla bearing Diary No. 341 dated 22/02/2023, for information and further necessary action please.

*Waqar*  
DISTRICT HEALTH OFFICER  
SHANGLA



# SHAH & SHAH LAW ASSOCIATES

**SABIR SHAH**

Advocate Supreme Court  
03005746744



SHAH & SHAH LAW ASSOCIATES

**AFTAB HUSSAIN BUTT**

Advocate High Court  
03139331973

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Office: Room S-8,9 Continental Plaza, Makaanbagh Mingora, District Swat. Phone No.0946-723356

NOORUL WAHAB --VERSUS-- GOVT. OF KP AND OTHERS.

To

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY HEALTH DEPARTMENT, KHYBER PAKHTUNKHWA AT PESHAWAR.
2. DIRECTOR GENERAL HEALTH SERVICES, GOVERNMENT OF KHYBER PAKHTUNKHWA AT PESHAWAR.
3. THE DISTRICT HEALTH OFFICER DISTRICT SHANGLA, AT ALPORAI.
4. MUHAMMAD IBRAHIM (SANITARY INSPECTOR) DHO OFFICE SHANGLA.

**Assalam-U-Alaikum !**

It is to bring into your kind notice, that, a Service Appeal in the august Khyber Pakhtunkhwa Service Tribunal at Peshawar, has been filed on behalf of Appellant against the impugned order No. 85-1-58/DHO/SH dated 20.02.2023 of Respondent No.3.

  
SABIR SHAH

Advocate Supreme Court of Pakistan

  
AFTAB HUSSAIN BUTT

Advocate High Court

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL AT PESHAWAR****WAKALAT NAMA**

38

Service Appeal No. \_\_\_\_\_ of 2023

Noorul Wahab **VERSUS** Government of KP and others.

I, Noorul Wahab S/O Abdul Maujood R/O Lilonai, Tehsil Alporai, District Shangla do hereby appoint **Sabir Shah Advocate Supreme Court of Pakistan, Aftab Hussain Butt Advocate, High Court (s)**, in the above mentioned case, to do all or any of the following acts, deeds and things: -

- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our nonappearance, any adverse judgment/order/decree is passed, they will not be held responsible.

IN WITNESS whereof I/we have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this **14-06-2023**

**Signature of Executant(s)** \_\_\_\_\_

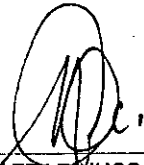
Noorul Wahab

CNIC No:

Cell No: 0306 55 88 993

**ATTESTED & ACCEPTED BY:**

  
**SABIR SHAH**  
 Advocate Supreme Court of Pakistan

  
**AFTAB HUSSAIN BUTT**  
 Advocate High Court

**S - 8.9, Continental Plaza, Makanbagh, Mingora Swat Ph: 0946-723356**