

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 1792/2022


Jangraiz Khan.....Appellant

Versus

Government of Khyber Pakhtunkhwa & othersRespondents

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Laeeq Ahmad,
Focal Person (Litigation)
office of DGHS, Khyber
Pakhtunkhwa, Peshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

Khyber Pakhtunkhwa
Service Tribunal

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1792 OF 2022

Diary No. 7090

Dated 18/8/2023

Jangraiz Khan.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 01 & 02

Respectfully Sheweth:

Preliminary Objections:-

1. That the appellant has got neither cause of action nor did locus standi to file the instant appeal.
2. That the appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant appeal is against the prevailing Law and Rules.
4. That the appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
6. That the appellant has not come to this Honorable Tribunal with clean hands.
7. That the appeal is barred by law and limitation.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.

ON FACTS:

1. Pertains to record.
2. Pertains to record.
3. Related to respondent No. 3.
4. Related to respondent No. 3.
5. Related to respondent No. 3.
6. Related to respondent No. 3.

7. Correct to the extent that the appellant has submitted departmental appeal for back benefits which was sent to the Hospital Director MTI DHQ Hospital Bannu for necessary action vide this Directorate letter dated 24/10/2022 (Annex-A).

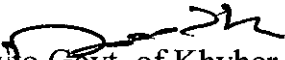
8. Incorrect. On his appeal action has already been taken as explained in preceding para.

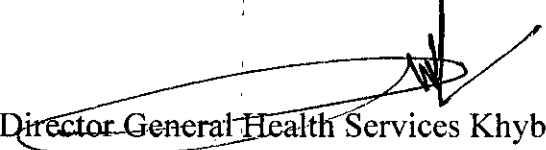
ON GROUNDS:

- A. Related to respondent No. 3.
- B. Related to respondent No. 3.
- C. Related to respondent No. 3.
- D. Related to respondent No. 3.
- E. Related to respondent No. 3.

PRAYER:

It is therefore humbly prayed that on acceptance of the comments, the instant appeal of the appellant may very graciously be dismissed with costs.


Secretary to Govt. of Khyber
Pakhtunkhwa Health Department
Respondent No. 01


Director General Health Services Khyber
Pakhtunkhwa Peshawar
Respondent No. 02
DD (Admin)

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DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR



E-Mail Address: mvfjdgsh@yahoo.com office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 11441 /Personnel Dated: 24/10/2022


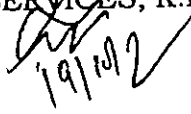
To

The Hospital Director
MTI-DHQ Hospital Bannu.

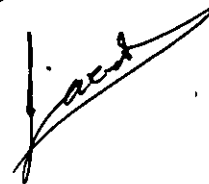
Subject:
Memo

DEPARTMENTAL APPEAL

Enclosed please find herewith a copy of an application alongwith its enclosures submitted by Mr. Jangraiz Khan Ward Orderly attached to MTI-DHQ Hospital Bannu which is self explanatory for further necessary action.


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

19/10/22

Attested



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

SERVICE APPEAL NO. 1792/2023

Jangraiz Khan.....Appellant

Versus

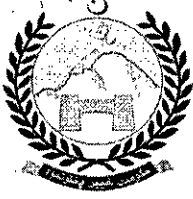
Government of Khyber Pakhtunkhwa & othersRespondents.

Affidavit

I, Laeeq Ahmad, Focal Person (Litigation) office of the Director General Health Services, Khyber Pakhtunkhwa, Peshawar, under the directions of the Competent Authority, do hereby solemnly affirm that the contents of the parawise Comments on behalf of Respondent are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off / costs.

Laeeq
Deponent

ALLESIED
Oath Commissioner
Distt. Courts
18-8-23



**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 # 091-9210269 Fax # 091-9210230*

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AUTHORITY LETTER

Mr. Laeeq Ahmad Focal Person (Litigation) Directorate General Health Services, Khyber Pakhtunkhwa, is hereby authorized to submit parawise comments in case Service Appeal No. 1792/2023-titled Jangraiz Khan VS Govt. of Khyber Pakhtunkhwa & others on behalf of the undersigned.

**Director General Health Services
Khyber Pakhtunkhwa, Peshawar.**