## IN THE LEARNED SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

| CM No/2023                  |                      |
|-----------------------------|----------------------|
| In                          |                      |
| Appeal No. 12100/2020       |                      |
| Dr. Abdullah                | Applicant/ Appellant |
| VE                          | ERSUS                |
| Government of KPK and other | rs Respondents       |

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Through

Applicant/ Appellant

**Nasir Mehmood** 

Advocate, Supreme Court of

Pakistan

## IN THE LEARNED SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

| CM No/2023                  | Service Tribunal     |
|-----------------------------|----------------------|
| In                          | Diary No. 7832       |
| Appeal No. 12100/2020       | Dated 25/09/23       |
| Dr. Abdullah                | Applicant/ Appellant |
| , 1                         | RSUS                 |
| Government of KPK and other | s Respondents        |

# APPLICATION FOR PLACING ON FILE ADDITIONAL DOCUMENTS IN THE ABOVE TITLED SERVICE APPEAL.

Respectfully Sheweth:

- 1. That the above mentioned case is pending adjudication before this Hon'ble Tribunal, which is fixed for 26.09.2023.
- 2. That at the time of filing the above noted appeal, the Retirement Order dated 26.05.2021 was not annexed which is necessary for the just disposal of the instant Appeal, therefore, the same may kindly be placed on record and consider as such. (Copy of additional

document/ retirement Order dated 26.05.2021 is Attached).

It is, therefore, most humbly prayed that on acceptance of this application, the annexed additional document/ retirement Order dated 26.05.2021 may kindly be brought on record.

Through

Applicant/ Appellant

Nasir Mehmood

Advocate, Supreme Court of

Pakistan

Dated: 25.09.2023

## IN THE LEARNED SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

| CM No/2023                   |                      |
|------------------------------|----------------------|
| In                           |                      |
| Appeal No. 12100/2020        |                      |
| •                            |                      |
| Dr. Abdullah                 | Applicant/ Appellant |
| VER                          | RSUS                 |
| Government of KPK and others | Respondents          |
|                              |                      |

#### **AFFIDAVIT**

I, Dr. Abdullah S/o Luqman Shah, Ex-SM (BPS-18), HMC, Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

DEPONENT

Identified by:

Nasir Mehmood

ACS,

CNIC# 17301-6782138-1 Cell # 0301-8971517



### GOVERNMENT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

Dated Peshawar the 26th May, 2021

#### **NOTIFICATION**

NO. SOH (E-V)5-5/2021 In pursuance of section 13A(1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No XVIII of 1973), and in supersession of Notification No. SO(Policy)E&AD/1-13/2019 dated 30/03/2021 (refers to the notification of conditional retirement), Dr. Abdullah S/O Luqman Shah Ex-SMO (BS-18) attached to Hayatabad Medical Complex, Peshawar stands retired from Government Service with effect from 01/04/2020 on attaining age of sixtieth (60<sup>th</sup>) years, as his Date of Birth is 02/04/1960. Sanction is also accorded to the grant of Three Hundred & Sixty Five (365) days encashment of leave in lieu of LPR w.e.f 01/04/2019 to 01/04/2020 in favour of the Doctor concerned.

Notwithstanding the supersession of Notification mentioned in above Para, any leave encashment granted or LPR and other benefit, if any, availed there under, and shall be deemed to be validly granted or availed.

#### SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

#### Endst. of even No. & Date.

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3. Hayatabad Medical Complex, Peshawar
- 4. Deputy Director (IT), Health Department, Khyber Pakhtunkhwa for uploading on official website.
- 5. PS to Secretary Health, Government of Khyber Pakhtunkhwa.
- 6. PS to Special Secretary, Health, Khyber Pakhtunkhwa.
- 7. Doctor concerned.
- 8. Personal file of the doctor concerned.

SECTION OFFICER (E-V)