

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR

Appeal No. 1171/2023


Safia ..... Appellant

Versus

Director General (Health), Khyber Pakhtunkhwa and others  
..... Respondent

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DEPONENT



حکومت صحت خیر پختونخوا

**DISTRICT HEALTH OFFICER  
MARDAN (Khyber Pakhtunkhwa)**

Ph: # (0937) 9230030 Fax: # (0937) 9230283  
Email: [mardandho@gmail.com](mailto:mardandho@gmail.com)

All communications should be  
addressed to the District  
Health Officer Mardan and not  
to any official by name

**Authority Letter**

Dr. Ahsan Athar Ali, Litigation Officer DHO Office, Mardan is hereby authorized to submit all court cases on behalf of the undersigned in Honorable Service Tribunal Peshawar.

District Health Officer

Mardan

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR

Appeal No. 1171/2023

Safia ..... Appellant

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Director General (Health), Khyber Pakhtunkhwa and others  
..... Respondent

**AFFIDAVIT**

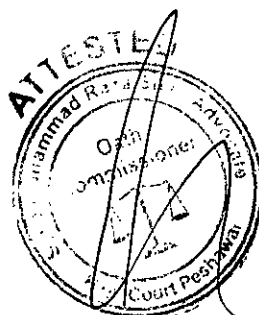
I, Dr. Ahsan Athar Ali, Litigation Officer DHO Office, Mardan do hereby solemnly affirm and declare on oath that the contents of the accompanying reply of DHO Office Mardan comments submitted by the respondents are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honourable tribunal.

  
DEPONENT

CNIC No: 16101-6804903-1  
Mobile No: 0342-0900001

IDENTIFIED BY

Advocate General,  
Khyber Pakhtunkhwa,  
Peshawar



10 OCT 2023

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**BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR**

**Appeal No.1171/2023**

Khyber Pakhtunkhwa  
Service Tribunal

Safia ..... Appellant Petition No. 8210

**Versus**

Dated 10/10/23

**Director General (Health), Khyber Pakhtunkhwa and others**  
..... **Respondent**

**Respectfully Sheweth:**

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS:**

**PRELIMINARY OBJECTIONS:**

- a) That the Appellant has got neither a cause of action nor a locus standi to file the service appeal.
- b) That the Appellant has not come to the tribunal with clean hands.
- c) Respondent department cannot even think of disobeying law.

**Facts:**

- 1. The Appellant was transferred to BHU kodinaka office order No. 2367-72/ DHO Dated 1/2/2023. (**Annexed-I**), the appellant did not join her duties and neither submitted her arrival report on her place of duty named BHU Kodinaka and her salary get stop (**Annexed-II**), the appellant was also relieved by incharge of Civil Dispensary Biglighar (**Annexed-III**). The appellant is not obeying orders and disobeying law and not performing her duties at her original place of posting.
- 2. Incorrect: She is marked absent by independent monitoring unit multiple times.
- 3. Answer is given in Supra Para No 1.
- 4. Answer is given in Supra Para No 1.

**GROUNDS:**

- A. Incorrect: The Appellant was transferred to BHU kodinaka office order No. 2367-72/ DHO Dated 1/2/2023. (**Annexed-I**), the appellant did not join her duties and neither submitted her arrival report on her place of duty named

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BHU Kodinaka and her salary get stop (**Annexed-II**), the appellant was also relieved by in charge of Civil Dispensary Biglighar (**Annexed-III**). The appellant is not obeying orders and disobeying law and not performing her duties at her original place of posting.

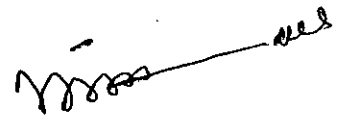
- B. Answer is given in Supra Para No 1.
- C. Answer is given in Supra Para No 1.
- D. Answer is given in Supra Para No 1.

**PRAYER:**

As the Appellant did not come with clean hands, so it is therefore prayed that the appeal may be dismissed with cost.



Director General Health Services,  
Khyber Pakhtunkhwa.  
**Respondent No. 01**



District Health Officer,  
Mardan  
**Respondent No. 03**

(ANNEXED - I)

DISTRICT HEALTH OFFICER  
MARDAN (Khyber Pakhtunkhwa)  
Ph: # (0937) 9230030 Fax: # (0937) 9230283  
Email: mardandho@gmail.com

All communications should be  
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Officer Mardan and not to any  
official by name



حکومت خیبر پختونخوا

No. 2367-78 DHO dated

01/02/2023

OFFICE ORDER

The following Ward Attendants (Dai) working on general duties is hereby directed to report for duty at their original place of posting immediately.

S.No	Name & Designation	From	To	Remarks
1.	Mst; Safia Dai	CD Bijligar	BHU Kodinaka	Original place of posting
2.	Mst; Amina Yousaf Dai	RHC Khazana Dheri	BHU Akbar Abad	Original place of posting
3.	Mst; Khatmul Begum Dai	RHC Bakhshali	BHU Baghicha Dheri	Original place of posting
4.	Mst; Asia Dai	CD Daga Piran	BHU Kati Garhi	Original place of posting
5.	Mst; Fazilat Dai	TDH Lund Khwar	BHU Takkar	Original place of posting
6.	Mst; Asia Dai	TDH Toru	BHU Qasim	Original place of posting

NB:- Arrival/Departure report should be submitted to this office.

District Health Officer,  
Mardan

Copy forwarded to the:

1. Deputy DHO Tehsil Mardan/Takht Bhai/Katlang/Rustam.
2. All Incharge of concerned health facilities.
3. Divisional Monitoring Officer, IMU Mardan
4. Accountant DHO office Mardan.
5. DHIS Cell DHO office Mardan
6. Official concerned.

for information and n/action.

District Health Officer,  
Mardan

Attested

(ANNEXED - II)



حکومت خیبر پختونخوا

**DISTRICT HEALTH OFFICER  
MARDAN (Khyber Pakhtunkhwa)**

Ph: # (0937) 9230030 Fax: # (0937) 9230283  
Email: [mardandho@gmail.com](mailto:mardandho@gmail.com)

All communications should be addressed to the District Health Officer Mardan and not to any official by name

No. 3662-66 /DHO Dated 02 / 02 / 2023

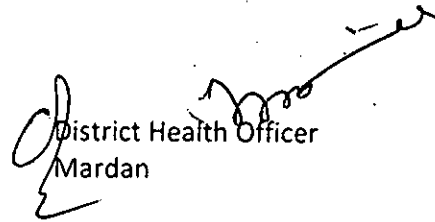
To

Mst. Safia, Dai  
Transferred to BHU Kodinaka

Subject: **EXPLANATION**

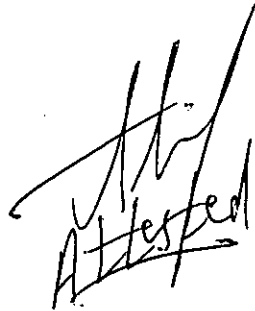
Reference this office order No. 2367-72/DHO dated 01/02/2023, you were transferred from CD Bijli Ghar to BHU Kodinaka, but you have not yet submitted your arrival report for duty at BHU Kodinaka. Such kind of irresponsible attitude towards Govt: duty is not acceptable and against the rules/regulations.

You are directed to immediately join your duty at BHU Kodinaka and also explain your position for not complying the orders of the undersigned within 03 days of the receipt of this letter. Otherwise, strict disciplinary action will be initiated against you.

  
District Health Officer  
Mardan

Copy forwarded to the:

1. District Monitoring Officer, IMU Mardan.
2. Incharge BHU Kodinaka.
3. Incharge CD Bijli Ghar is directed to relieve the above named official immediately.
- ④ Accountant DHO Office Mardan is directed to stop the salary of the above named official if not arrived for duty at BHU Kodinaka.

  
Attested

  
District Health Officer  
Mardan

(ANNEXED - III)

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Diary No. 01-02 /CD Bijlighar  
Dated:

Mst. Safia (Dai),  
CD Bijlighar.

Subject: EXPLANATION/RELIEVING ORDER

Kindly refer to the District Health office letter No. 3662-66/DHO Dated 20/02/2023, as per directions received from District Health office, you are hereby relieved from your services at CD Bijlighar with immediate effect.

Woman Medical Officer/In-Charge  
CD Bijlighar

Copy Forwarded to:

District Health Officer Mardan,  
(In respect of office letter No. 3662-66/DHO Dated 20/02/2023.)

DAIRY CLERK  
DHO OFFICE MARDAN  
NO 664  
DATE 23-08-2023

Woman Medical Officer/In-Charge  
CD Bijlighar

*Sundas*

*Attested*

*Call Explanation File*

District Health Officer  
Mardan

2023 0-02

CHARGE  
r Mardan

