

FORM OF ORDER SHEET

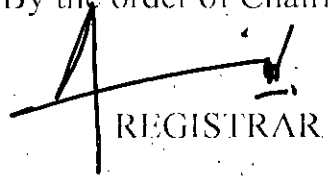
Court of _____

Appeal No. 2592/2023

S.No.	Date of order	Order or other proceedings with signature of judge
	proceedings	
1	2	3
1-	15/12/2023	

The appeal of Dr. Shakeel Ahmad Alvi received today by registered post through Mr. Babar Ilyas Advocate. It is fixed for preliminary hearing before touring Single Bench at A. Abad on _____.

By the order of Chairman


REGISTRAR

The appeal of Dr. Shakeel Ahmad received today i.e on 08.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Memorandum of appeal be signed by the appellant.
- 4- Annexures of the appeal are unattested.
- 5- Annexures-B & C of the appeal are illegible which may be replaced by legible/better one.
- 6- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3824 /S.T.

Dt. 11-12 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Babar Ilyas Adv.
High Court Mansehra.

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

Appeal no. 2592/2023

Dr. Shakeel Ahmed Alvi.....Appellant

Versus

Secretary Health, Government of
Pakhtunkhwa, Peshawar etc...Respondents

SERVICE APPEAL

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Dated 6/12/2023

Dr. Shakeel Ahmed Alvi
(Appellant)

Through: -

BABAR ILYAS
Advocate High Court,
District Courts,
(Mansehra)

BEFORE THE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Diary No. 9768

Dated 08-12-2023

Appeal no. 2592/2023

Dr. Shakeel Ahmed Alvi son of
Muhammad Jamil-Ud-Din Alvi, resident
of Ghaziot Township, Tehsil and District
Mansehra.....Appellant

Versus

- 1) Secretary Health, Government of
Pakhtunkhwa, Peshawar.
- 2) Director General Health Services,
KPK, Peshawar.
- 3) Regional Director General Health
Hazara Division, Abbottabad.
- 4) District Health Officer, Torghar
- 5) District Accounts Officer, Torghar
.....Respondents

**SERVICE APPEAL UNDER SECTION 4
OF THE KPK SERVICE TRIBUNAL ACT
1974, AGAINST THE ORDER NO. 3023-
26 DATED 19.06.2023 AND OTHER
BIASED, PREJUDICE, VERBAL AND
ORAL ORDERS OF DISTRICT HEALTH
OFFICER TORGHAR/RESPONDENT N.
4 THROUGH WHICH HE STOPPED THE
SALARY AND NOT ALLOWING THE
APPELLANT TO PERFORM HIS DUTY
IN BASIC HEALTH UNIT DOR MERA,
FURTHERMORE ANY OTHER HIDDEN,
CONCEALED AND UNCOMMUNICATED
ORDER AGAINST THE APPELLANT
MAY GRACIOUSLY BE DEEMED AS
IMPUGNED HEREIN APPEAL AND MAY
KINDLY BE SET ASIDE.**

PRAYER: -

On acceptance of instant appeal the
respondent No. 4/District Health Officer
Torghar may graciously be ordered not to

Filed by

08/12/23

create hurdle in the performance of appellant duty and allow him to perform his duty at his posted place BHU Dor Mera, furthermore the concerned may be ordered to release his salary of the duty performed period i.e. 01.03.2023 till now and if any concealed, hidden and uncommunicated order is passed against the appellant which adversely effect the appellant may kindly be set aside and relieving order dated 19.06.2023 may also be set aside and appellant may kindly be allowed to perform duty at his place of posting.

Respectfully submitted: -

- 1) That, the appellant is Medical Officer of BPS-17 and was performing his duty in BHU Dor Mera after his appointment.

(Copy of the appointment order is annexed herewith as Annexure "A")

- 2) That, during service the appellant has to left the country for safety purpose due to this reason, the appellant was absent from 24.04.2022 to 28.02.2023. Later-on with the involment of elders and nobility of seniors local citizens the issue was peacefully resolved and appellant came back.

- 3) That, for this period the department seek explanation from the appellant and in this regard the appellant satisfied the department, thereafter the appellant was allowed to

perform his duty and his salary was activated.

(Copies of activation of salary and application of appellant are annexed as Annexure "B" & "C")

- 4) That, after all these scenario the appellant remained punctual and consistent in performance of his duties.
- 5) That, respondent No. 4/DHO Torghar due to some personal grudges started creating hurdle in the performance of appellant duty on one or other pretext and for this purpose his salary of his performed duty period was not given to him which is against the law and fundamental right.
- 6) That, the respondent No. 4 issued relieving order No. 3023-26 dated 19.06.2023 and stop him from performing his duty in pursuance of that letter the appellant appeared before the concerned and they directed to continue duty at BHU Dor Mera and the respondent No. 4/DHO Torghar was directed vide order No. 7441 dated 22.06.2023 to withdraw the relieving order and if the appellant is at fault it may be inquired as per law, thereafter the

(9)

appellant resumed charged and perform his duty in BHU Dor Mera regarding which entry of all attendance is present in register.

(Copy of order relieving dated 19.06.2023 is annexed as Annexure "D" and withdrawal order dated 22.06.2023 is annexed as Annexure "E" and register is annexed as Annexure "F")

- 7) That, the respondent No. 4/DHO Torghar again due to his personal malice and grudge practically stopped the appellant from performance of his official duty at BHU Dor Mera and directed the respondent/ District Accounts Officer Torghar not to release the salary.
- 8) That, against the unlawful acts of respondent No. 4 the appellant filed an departmental representation before appellate authority on 23.08.2023 but despite of lapse 90 days no reply has been received by appellant so far.

That, being aggrieved by the act of DHO Torghar appellant having no other remedy except to file the present appeal before this worthy Tribunal for interference *inter-alia* on the following other

GROUNDS: -

- A) That, appellant is presently a government servant as Medical Officer of BFS-17 and respondents have no authority to stop him from the performance of his official duties.
- B) That, admittedly the appellant remained absent from duties from 22.04.2022 to 28.02.2023 and he gave plausible reasonable and genuine reason for his absence, which was accepted and he was allowed to resume his service by the department, thereafter the appellant resumed his charged and respondent No. 4/DHO Torghar himself addressed to the Director General Health & Services KPK Peshawar/respondent No. 2 for activation of appellant service through letter No. 2780-81 dated 03.05.2023 and now surprisingly he himself forcefully stopping the appellant from his duty.
- C) That, in case if there is any fault on the part of appellant, he must be given the right of fair and impartial hearing which is the right of appellant warranted and guaranteed

by constitution and as well as by the services law.

- D)** That, the department especially respondent No. 4 acting malafidly and dictatorially and their such acts and concealed, un-communicated order cannot be left un-leashed, because these are also against the rule of natural justice.
- E)** That, the respondent No. 2/ Director General Health Services KPK Peshawar vide order No. 7440 dated 22.06.2023 clearly directed and order DHO Torghar to withdraw the relieving order and in case of any default or misconduct is on the part of appellant, it should be inquired through proper inquiry as per law, but the DHO Torghar is not giving due weightage to the order of superior and by acting against the order and law in dictatorial manner he is actually dis-representing his senior.
- F)** That, the other points will be agitated with the permission of Honourable Court at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant appeal, the

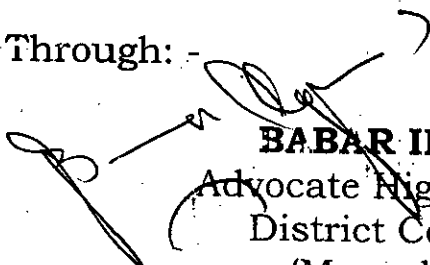
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respondent No. 4/DHO Torghar may kindly be ordered not to create hurdle in the performance of appellant duties and salary of his performed period may kindly be released and in case any hidden or un-communicated order is made against the appellant it may also be set-aside.

Dated 6/12/2023

Dr. Shakeel Ahmed Alvi
(Appellant)

Through: -


BABAR ILYAS
Advocate High Court,
District Courts,
(Mansehra)

VERIFICATION

I, DR. SHAKEEL AHMED ALVI SON OF MUHAMMAD JAMIL-UD-DIN ALVI, RESIDENT OF GHAZIOT TOWNSHIP, TEHSIL AND DISTRICT MANSEHRA DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

DR. SHAKEEL AHMED ALVI
(DEPONENT)



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

Dr. Shakeel Ahmed Alvi.....**Appellant**

Versus

Secretary Health, Government of
Pakhtunkhwa, Peshawar etc...**Respondents**

**SERVICE APPEAL UNDER SECTION 4
OF THE KPK SERVICE TRIBUNAL ACT
1974**

**APPLICATION FOR ORDERING THE
RESPONDENT NO. 4/DHO TORGHAR
TO ALLOW APPELLANT TO PERFORM
HIS DUTY AT BHU DOR MERA AND
THE SAID RESPONDENT MAY KINDLY
BE DIRECTED TO NOT CREATE
UNDER HURDLE IN HIS
PERFORMANCE OF DUTY AT PLACE
OF POSTING.**

Respectfully Sheweth!

- 1) That, alongwith this application an appeal is being filed which may kindly be considered the part and parcel of this application.
- 2) That, the appeal of appellant is prima facie good one and he is sanguine of its success.
- 3) That, the balance of convenience is in favour of appellant.
- 4) That, if the application is not allowed the appellant would suffer irreparable loss.


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It is, therefore, requested that appellant may kindly be allowed to perform his duty as per heading of application.

Dated 6/12/2023

Dr. Shakeel Ahmed Alvi
(Appellant)

Through: -

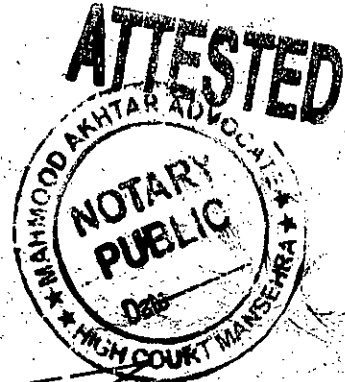

BABAR ILYAS
Advocate High Court,
District Courts,
(Mansehra)

AFFIDAVIT

I, DR. SHAKEEL AHMED ALVI SON OF MUHAMMAD JAMIL-UD-DIN ALVI, RESIDENT OF GHAZIOT TOWNSHIP, TEHSIL AND DISTRICT MANSEHRA DO HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT THE CONTENTS OF FORE-GOING APPLICATION ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

DR. SHAKEEL AHMED ALVI
(DEPONENT)






06/12/2023

BEFORE THE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Dr. Shakeel Ahmed Alvi.....Appellant

Versus

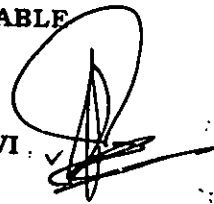
Secretary Health, Government of
Pakhtunkhwa, Peshawar etc...Respondents

SERVICE APPEAL UNDER SECTION 4
OF THE KPK SERVICE TRIBUNAL ACT
1974

AFFIDAVIT

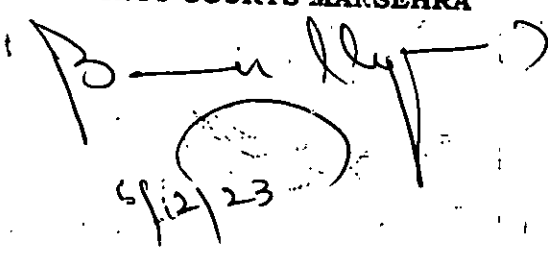
I, DR. SHAKEEL AHMED ALVI SON OF MUHAMMAD
JAMIL-UD-DIN ALVI, RESIDENT OF GHAZIOT
TOWNSHIP, TEHSIL AND DISTRICT MANSEHRA DO
HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH
THAT NO SUCH SUBJECT MATTER APPEAL HAS EVER
BEEN FILED NOR PENDING NOR DECIDED. THAT THE
CONTENTS OF FORE-GOING APPLICATION ARE TRUE
AND CORRECT TO THE BEST OF MY KNOWLEDGE
AND BELIEF AND NOTHING HAS BEEN CONCEALED
OR SUPPRESSED FROM THIS HONOURABLE
TRIBUNAL.

DR. SHAKEEL AHMED ALVI
(DEPONENT)



IDENTIFIED BY: -

BABAR ILYAS,
ADVOCATE HIGH COURT,
DISTRICT COURTS MANSEHRA


5/12/23

ATTESTED



12
66/2923

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

Dr. Shakeel Ahmed Alvi.....Appellant

Versus

Secretary Health, Government of
Pakhtunkhwa, Peshawar etc...Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

Respectfully Sheweth!

Correct addresses of the parties are as
under: -

APPELLANT

Dr. Shakeel Ahmed Alvi son of Muhammad
Jamil-Ud-Din Alvi, resident of Ghaziot
Township, Tehsil and District Mansehra

RESPONDENTS

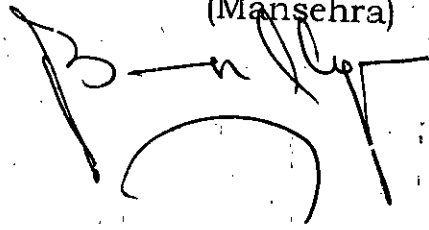
- 1) Secretary Health, Government of
Pakhtunkhwa, Peshawar.
- 2) Director General Health Services, KPK,
Peshawar.
- 3) Regional Director General Health
Hazara Division, Abbottabad.
- 4) District Health Officer, Torghar
- 5) District Accounts Officer, Torghar.

Dated 6/12/2023

Dr. Shakeel Ahmed Alvi
(Appellant)

Through: -

BABAR JLYAS
Advocate High Court,
District Courts,
(Mansehra)





Annexure A



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar May 26, 2017.

NOTIFICATION

NO.SO(E)H-II/3-18/2017(1): In pursuance of clause (iii) of sub-section 1 Section 3 of the Khyber Pakhtunkhwa (Regularization of Services) Act, 2017. (Khyber Pakhtunkhwa Act No. VII of 2017), the following Medical Officers BS-17, appointed on Adhoc basis, shall stand regularized with immediate effect against the posts which they are holding at the time of commencement of the Act Ibid:

S.#	Name of doctor	Present posting
Charsadda		
1.	Syed Shaharyar Shah S/O Dr. Syed Roidar Shah	DHQH Charsadda
2.	Falqa Khan D/O Mohibullah Khan	DHQH Charsadda
3.	Mahwish Khan D/O Hmayat Ullah Khan	DHQH Charsadda
4.	Ranaz Begum D/o Nisar Ahmad	DHQH Charsadda
5.	Rabla Munir D/O Munir Ahmad	DHQH Charsadda
6.	Hadla Sabir D/O sabir Elahi	DHQH Charsadda
7.	Shumalla Raza D/o Anwar Shah	DHQH Charsadda
8.	Sidra Irshad D/O Muhammad Irshad	DHQH Charsadda
9.	Bibi Sabilla D/O Muhammad Saleem	DHQH Charsadda
10.	Maryam Javid D/O Karam Javid	DHQH Charsadda
11.	Shan-e- Zahra D/O Muhammad Khalid Mehmood	DHQH Charsadda
12.	Fatima D/O Khair Ul Bashar	DHQH Charsadda

Secretary
Health Department
Government of Khyber Pakhtunkhwa

Advocate High Court
Manshera

156.	Rafi Ullah s/o Inayatullah	Attached to DHO Tank
157.	Maria Zill-e-Huma D/O Ghulam Sarwar	Attached to DHO Tank
Kohat		
158.	Kashif Javed s/o Muhammad Javed	LMH Kohat
159.	Sadia Haider D/O Haider Zaman	LMH Kohat
160.	Syed Hamid Hussain Banoori S/O Syed Fazal Hussain Banoori	DHQ Hospital, Kohat
161.	Farhan Mukhtiar S/O Mukhtiar Ali	DHQ Hospital, Kohat
162.	Qaiser Ali S/O Afzal Hussain	DHQ Hospital, Kohat
163.	Naushaba Lal Muhammad Khan D/O Lal Muhammad Khan	DHQ Hospital, Kohat
164.	Muhammad Hamid S/O Naseem Gul	DHQ Hospital, Kohat
165.	Imran Khan Afridi s/o Sharif Khan Afridi	DHQ Hospital, Kohat
166.	Hashmat Ullah Khan S/O Amal Khan	DHQ Hospital, Kohat
Peshawar		
167.	Mian Saad Ahmed s/o Mian Abdus Samad	Khyber Medical College Peshawar
168.	Muhammad Yasir Khan s/o Sher Rehman	Khyber Medical College Peshawar
Torghar		
169.	Suffian Khan s/o Muhammad Tanveer	Attached to DHO Torghar
170.	Muhammad Assad s/o Muhammad Saeed	Attached to DHO Torghar
171.	Usman Roshan s/o Muhammad Roshan Khan	Attached to DHO Torghar
172.	Shakeel Ahmad Alvi s/o Jamilud Din Alvi	Attached to DHO Torghar
173.	Kamran Sabir s/o Sabir Sultan	Attached to DHO Torghar

Govt. of Punjab
Health Department

Muhammad
Advocate
Advocate High Court
Manskhra



385.	Tooba Iftikhar D/O Mian Iftikhar Ud Din	Attached to DHO Charsadda
386.	Muhammad Shualb S/O Attiq Ur Rehman	Attached to DHO Charsadda
387.	Tanveer Fatima D/O Abdul Qayyum	Attached to DHO Charsadda
388.	Asma Zahir D/O Muhammad Zahir Khan	Attached to DHO Charsadda
389.	Muhammad Jawad S/O Jan Nisar	Attached to DHO Charsadda
390.	Faiza Nadeem D/O Ahmad Nadeem	Attached to DHO Charsadda
391.	Sana Pervez D/O Pervez Alam	Attached to DHO Charsadda
392.	Shayan Pervez D/O Pervez Alam	Attached to DHO Charsadda
393.	Kashmala Humayun D/O Muhammad Humayun	Attached to DHO Charsadda
394.	Sajjad Razaq S/O Abdul Razaq	Attached to DHO Charsadda
395.	Samiha Salfullah D/o Saif-Ullah	Attached to DHO Charsadda
396.	Rooh Ullah S/O Aziz Ullah	Attached to DHO Charsadda
397.	Gul Rang D/O Bashir Ahmad	Attached to DHO Charsadda
398.	Akbar Azam s/o Bashir Ahmad	Attached to DHO Charsadda
399.	Iftikhar Ahmad S/O Muhammad Israr Khan	Attached to DHO Charsadda
400.	Aftab Khan S/O Muhammad Islam	Attached to DHO Charsadda
401.	Syed Adnan Shah s/o Muhammad Yaseen	Attached to DHO Charsadda
402.	Amna Shaukat D/O Shaukat Ali	Attached to DHO Charsadda

*Muhammad
s/o
be S/O
[Signature]*

[Signature]
Gen. Secy. District Peshawar
Peshawar




Note:

1. The inter-se seniority of the doctors will be determined and notified separately.
2. The above mentioned candidates will be on probation for initial period one year extendable upto another one year, if not terminated in writing or envisaged in Rule 15 on Appointment, Promotion and Transfer Rules, 1959.

SECRETARY HEALTH

Endt No of even and date.

1. Accountant General, Khyber Pakhtunkhwa.
2. All Commissioners in Khyber Pakhtunkhwa.
3. Director General, Health Services, Khyber Pakhtunkhwa.
4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
5. All Deputy Commissioners in Khyber Pakhtunkhwa.
6. All District Health Officers in Khyber Pakhtunkhwa.
7. All District Accounts Officers in Khyber Pakhtunkhwa.
8. All Medical Superintendent in Khyber Pakhtunkhwa.
9. Manager Printing Press, Khyber Pakhtunkhwa.
10. PS to Secretary Health, Khyber Pakhtunkhwa.


 26.5.20
 (Jibrael Raza)
 Section Officer (E-II)
 Section Officer II,
 Govt. of Khyber Pakhtunkhwa
 Health Department

Received
 E. J. Raza

 KRAM-31-00
 Advocate
 Manshera



16
Annexure B

OFFICE OF THE
DISTRICT HEALTH OFFICER
TORGHAR

No. Letter /2022-23/2780-81
Dated Torghar 03/05/2023

To.

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Subject: ACTIVATION OF SALARY r/o DR. SHAKEEL AHMED ALVI.

Sir,

In continuation of letter No-2529-32 Dated-28/02/2023 regarding resumption of arrival of Dr. Shakeel Ahmed Alvi M.O.BPS-17 Annex 1 copy attached for ready reference. He is now performing his duty regularly and is punctual. Your guidance in this regard is needful to activate his salary.

District Health Officer
Torghar

No 2780-81

Dated 03/05/2023

Copy forwarded to:

1. Dr. Shakeel Ahmed Alvi Medical Officer (U) Durr Maira Torghar for information.

Shakeel
to the Director
Durr Maira

Advocate High Court
Manshera

District Health Officer
Torghar

(17)

Annexure C²

The Worthy Secretary,
Health Department,
Govt. of Khyber Pakhtunkhwa.

Subject: REQUEST FOR EX-POST FACTO SANCTION

Respected Sir,

It is stated that I Dr. Shakeel Ahmed Alvi Medical Officer B.H.U Dore Mera received the explanation letter (Copy enclosed) regarding absence from duties from 22-04-2022 to 28-02-2023.

In the context of above mentioned explanation letter, I submitted my reply to District Health Officer, Torghar and stating that due to some serious threats received from my family members left the country for safety purpose.

Later on due to involvement of some senior local citizens the issue has been peacefully resolved and I came back to my home country and joined my official duties re 28-02-2023 (Copy enclosed).

I am humbly requesting that kindly withdraw all the disciplinary action against me and granted Ex Post Facto sanction leaves re 22-04-2022 to 28-02-2023 from my leave account.

I shall be very careful in future and will be responsible regarding my duties. I shall be very thankful for this act of kindness.

Yours Faithfully,

Handwritten signature and date: 22/04/2023
Stamp: **Muhammad Ali Qayyum**
Advocate High Court
Miansehra

Handwritten signature of Dr. Shakeel Ahmed Alvi

Handwritten date: 01/03/2023
Printed name: **Dr. Shakeel Ahmed Alvi**
Medical Officer B.H.U
Dore Mera.

Amulave D

DISTRICT
No. /letter/2023
Dated Torghar

19/7/2023

To: ✓ Dr. Shakeel Ahmed Alvi
Medical Officer BHU Dour Maira.

Subject: RELIEVING ORDER.

Reference to this office letter No-2529-32 Dated 28/02/2023 you were allowed to join your duty conditionally mentioned in the letter above. After significant time lapsed you failed to fulfill the required observations from District Account Office Torghar and DGHS Peshawar.

Furthermore, keeping in view multiple complaints and previous track record you are hereby directed to report to DGHS Peshawar for further necessary action/ posting.

District Health Officer
Torghar

copy forwarded to:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. Regional Director General Health Hazara Division Abbottabad.
3. PS to Secretary Health Govt of Khyber Pakhtunkhwa Peshawar.

Amulave D

Iqbal-ur-Rahman
Advocate High Court
Manshera

District Health Officer
Torghar



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 - 9210260 Exchange # 091 - 9210187, Fax / 091 - 9210230

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Annexure
"E"

No. 7441 /E.I Dated: 08/06/2023

To

The District Health Officer,
Torghar.

Subject: - RELIEVING ORDER

Reference your letter No. 2022-23/3023-26 dated Torghar 19.04.2023 on the subject noted with the remarks to withdraw the relieving order of Dr. Shakeel Ahmad Alvi MO BS-17 attached to BHU Dour Maira District Torghar as relieving is no remedy. However you may report the misconduct, if committed, with proper recommendations so that the matter may be inquired properly and proceed further in the matter as per rules/law.

[Signature]
Fa

DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

*Alleshaed
to be reviewed*

[Signature]
Advocate Mansoor
Mansoor

2/6

Daily Attendance Register of the H. U

DATE AND HOL

Serial No.	Name	Rank	1	2	3	4	5	6	7	8	9	10
①	D. Shereefullah (MO)	M.O	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
②	Mula Said. (SMT)	SMT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
③	Ihsan-ullah (MT)	MT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
④	Azam Shah (MT)	MT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑤	Mokib-ullah (MT)	MT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑥	Nazakat Bibi (LIV)	LIV	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑦	Zia-ullah (Epi-Tech)	Epi-Tech	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑧	Amir Ahmad (Epi-Tech)	Epi-Tech	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑨	Zehra Bibi (Dai)	Dai	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑩	Alib sh (W/B)	W/B	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑪	Sahib G.S. (B/S)	B/S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
⑫	Muhammad Shariq (C/D)	C/D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Attested
to be true
Advocate High Court
Mansabara

or the Month of

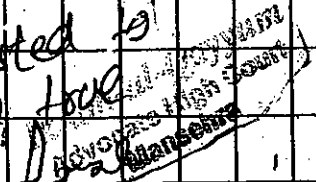
JUNE 20 23

(2)

ATTENDANCE

14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P		
N	N	N	N	N	X	N	N	N	N	N	N	N	N	N	N	N	N		MSA said sh- court issue
P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P		
A	A	A	A	A	X	A	A	A	A	A	A	A	A	A	A	A	A		
N	N	N	N	N	X	N	N	N	N	N	N	N	N	N	N	N	N		
N	N	N	N	N	X	N	N	N	N	N	N	N	N	N	N	N	N		
P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P		
A	A	A	A	A	X	A	A	A	A	A	A	A	A	A	A	A	A		
P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P		
P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P		
P	P	P	P	P	X	A	A	P	P	P	P	P	P	P	P	P	P		

JULY HOLIDAYS
 JULY 1-7
 JULY 10-12
 JULY 15-17
 JULY 20-22
 JULY 24-26
 JULY 29-31

Attested to
 by

 Advocate High Court
 Mansarovar

Inspected
 5/6/23
 ADCU TR

THIS MARKED UP SHEET @ 5:00 PM. (A)

Daily Attendance Register of the B.H.U Staff

DATE AND HOUR

Serial No.	Name	Rank	1	2	3	4	5	6	7	8	9	10
①	D. Saifuddin Ali (M.O)	M.O	B	X	X	X	X	X	X	X	X	X
②	Faruq, Said (SMT)	SMT	X	X	X	X	X	X	X	X	X	X
③	Ihsan - Ullah (MT)	MT	B	X	X	X	X	X	X	X	X	X
④	Azam Shah (MT)	MT	X	X	X	X	X	X	X	X	X	X
⑤	Mohib - Ullah (MLT)	MLT	X	X	X	X	X	X	X	X	X	X
⑥	Nazakat Bibi (LHV)	LHV	X	X	X	X	X	X	X	X	X	X
⑦	Zia - Ullah (Epi-Tech)	Epi	X	X	X	X	X	X	X	X	X	X
⑧	Ameer Ahmed (Epi-Tech)	Epi	X	X	X	X	X	X	X	X	X	X
⑨	Zahida Bibi - Dai	Dai	P	X	P	P	P	P	P	P	X	④
⑩	Atib sb (W/B)	W/B	P	X	P	P	P	P	P	P	X	P
⑪	Sahi Gu. (B/S)	B/S	P	X	P	P	P	P	P	P	X	P
⑫	Noor - Shami - Zay. (Chowkidar)	C/D	P	X	P	P	P	P	P	P	X	P

Attested
to be true
Advocate High Court
Marsheha

Daily Attendance Register of the B.H.U. Staff

DATE AND HOUR

Serial No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11
1	Dr. Shakeel Ali (M.O)	Mo	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
2	Muzahid - Said (SMT)	SMT	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
3	Ihsan - Ullah (SMT)	MT	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
4	Azad Shah (SMT)	MT	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
5	Muhammad - Ullah (Lab Tech)	Lab Tech	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
6	Nazakat - Bibi (LHV)	LHV	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
7	Zia - Ullah (Epi Tech)	EPI Tech	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
8	Amyr Ahmed (Epi Tech)	EPI Tech	X	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ	ⓧ
9	Zahida Bibi (Dai)	Dai	X	P	P	P	P	P	X	P	P	P	P
10	Atib - Siddiqui (W/B)	W/B	X	P	P	P	P	P	X	P	P	P	P
11	Sahib - Gani (B/S)	B/S	X	P	P	P	P	P	X	P	P	P	P
12	Noor - Shaukat (Chowkidar)	Choki	X	P	P	P	P	P	X	P	P	P	P

Attested
to be true
Mansoor

OF ATTENDANCE

23

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
P	P	P	X	P	P	P		P	P	P	P	P	P	P	P	P	P	P		
M	M	M	X	M	M	M		M	M	M	M	M	M	M	M	M	M	M	1	Casual leave for 2 days
P	P	P	X	P	P	P		P	P	P	P	P	P	P	P	P	P	P		
A	A	A	X	A	A	A		A	A	A	A	A	A	A	A	A	A	A		
M	M	M	X	M	M	M		M	M	M	M	M	M	M	M	M	M	M	1	
N	N	N	X	N	N	N		N	N	N	N	N	N	N	N	N	N	N		
Wa	Wa	Wa	X	Wa	Wa	Wa		Wa	Wa	Wa	Wa	Wa	Wa	Wa	Wa	Wa	Wa	Wa		
Am	Am	Am	X	Am	Am	Am		Am	Am	Am	Am	Am	Am	Am	Am	Am	Am	Am		
P	P	P	X	P	P	P		P	P	P	P	P	P	P	P	P	P	P		Absent
P	P	P	X	P	P	P		P	P	P	P	P	P	P	P	P	P	P		
P	P	P	X	P	P	P		P	P	P	P	P	P	P	P	P	P	P		
P	P	P	X	P	P	P		P	P	P	P	P	P	P	P	P	P	P		

Attested
by
[Signature]
Advocate High Court
Manshira

WSP
[Signature]
ADD G)
10/7/23

Daily Attendance Register of the

DATE AND HOUR

Serial No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11
(1)	Dr. Shakeel Ahmad (M.T.O)	M.O	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(2)	MULLA-SAID	SMT.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(3)	JHSA-MULLAH	MT.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(4)	AZAM-SHAH	MT.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(5)	MUHI-BULLAH	BS Lab Tech	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(6)	ZIAU-LLAH	EPI Tech.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(7)	AMIR-AHMAD	EPI Tech.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(8)	NIZAKAT	LHV	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(9)	SAHIB-GUL	BIS	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(10)	ATEB-KHAN	W/O	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(11)	SALMAN	S- Tech.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(12)	NOOR-SHANI-ZAR	Chokidar	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(13)	BIBI-HAJIRA	Dai	Transfer to										
(14)	Zawida binti	Dai	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Attested
rope here

[Signature]

Umm-ul-Qayyum
Advocate High Court
Manchester

OF ATTENDANCE

(21)

14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
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W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
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W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
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W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		
W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W		

Inspector
H/S
28/3/20

Transfer to B
Candi

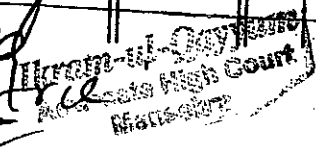
Attested
to be
true

Manoj K. Bhatnagar
Assistant High Comm
Managers

Jack

Serial No.	Name	Rank												
			1	2	3	4	5	6	7	8	9	10		
(1)	Dr. Shauket Ali (M.D)	M.D	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(2)	Muhammad Said (SMT)	SMT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(3)	Ihsan-ullah (SMT)	SMT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(4)	Azam-ullah (SMT)	SMT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(5)	Muhib-ullah BS (MLT)	MLT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(6)	Zia-ullah (E.Pi-Tech)	E.Pi	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(7)	Azhar Ahmed (E.Pi-tech)	E.Pi	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(8)	Nazakat (L.T.V)	L.T.V	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(9)	Sahib Gul (B/S)	B/S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(10)	Ash Ameer (L/R)	L/R	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(11)	Salman (S. Tech)	S. Tech	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(12)	Noor Shami Zair (chowkidar)	CD	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
(13)	Zahida bibi (Dai)	Dai	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Attested
to be true
[Signature]



OF ATTENDANCE

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks		
Holidays											E											
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
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N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
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N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				
N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N				

Attested to be true
[Signature]
 Director of Jyoti
 Manshira

To

Annexure
CG

30

The Secretary Health
Department Govt of KPK

Subject: Releasing salary from 01.03.2023 to 31.08.2023

Respected sir,

That the petitioner SHAKEEL AHMED medical officer performing his duties in BHU, Dor Mera, That during service the petitioner had left the country for safety purpose due to this reason he was absent from 24/04/2022 to 28/02/2023. After settlement of issues the petitioner came back.

That The petitioner joined his duties , and officially he was allowed to perform his duties (copy is annexed) the District Health Management issued a relieving letter and abstained the petitioner from duties, but due to worthy indulgence of worthy director health department GOVT OF KPK , the relieving order was set-aside and petitioner was allowed to resume his charge (copy is annexed) .

That the petitioner is performing his duty will be great sense of responsibility and concerned authority has stopped the salary without any cause from 01.03.2023 to till now. It is the right of petitioner to receive his salary and such right is protected by constitution of Pakistan, but now DHO concerned forcefully , due to some personal grudge not allowing to perform his duties.

It is therefore most humbly prayed that the order of releasing salary may graciously be issued to the favor of petitioner.

Dated:

23/08/2023

petitioner

Attested
to be true

[Signature]

Ibrahim-ul-Qayyum
Advocate High Court
Mansobra

[Signature]

BAM No. 184
 BC No. 10-2817
 Name of Advocate بالم انیس

S.No 31810

Fee Rs. 200/-



2023-24
 GENERAL SECRETARY
 District Bar Association
 Munsheerabad

وکالت نامہ

بعدالت: فد سروس کانسٹیبل
 عنوان: ڈاکٹر شکیل احمد حلوی
 منجانب: ایڈووکیٹ
 نوعیت مقدمہ: سرکاری لیس

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام بالم انیس کے لئے
 کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رہ بروعدالت حاضر ہوتا رہوں گا اور بوقت پکارے
 جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ
 میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پکھری کے علاوہ
 کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ پکھری کے علاوہ
 کسی اور جگہ سماعت ہو یا پکھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار
 نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست
 بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کا روپیہ وصول
 کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور پردہ نثانی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف
 کر بشرط ادا ہوگی علیحدہ محتاتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدرجہا مقدمہ یا اپیل نگرانی کسی دوسرے وکیل یا پیرسٹر کو
 بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو
 اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت
 میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداختہ وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔
 لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سندر ہے۔ مضمون وکالت نامہ کن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

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ACCEPTED

6/12/23