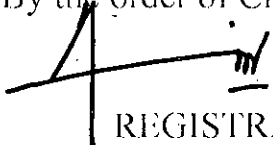


FORM OF ORDER SHEET

Court of _____

Appeal No. 2567/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/12/2023	<p>The appeal of Mst. Arabistan Bibi resubmitted today by Mr. Ifikhar Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mst. Arabaistan Bibi LHW received today i.e on 24.11.2023 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.
- 3- Annexures of the appeal are unattested.
- 4- Memorandum of appeal is not signed by the appellant.
- 5- Address of the appellant is incomplete be completed, according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 6- Departmental appeal is unsigned and undated.
- 7- Annexures-A & B of the appeal are illegible which may be replaced by legible/better one.
- 8- Annexures of the appeal are not in sequence.
- 9- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3686 /S.T,

Dt. 24-11 /2023



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Iftkhar Ali Adv.
High Court Swat.

all the objection are removed

*Iftkhar
Khan*

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . 2567 / 2023

Mst, Arabistan Bibi Appellant

Versus

Govt: of KP and others: Respondents

INDEX

S#	Documents	Annex	Pages
1.	Memorandum of service appeal		1-4
2.	Certificate		5
3.	Affidavit		6
4.	Memo of address		7
5.	Copies of appointment order	"A"	8-9
6.	Copies of regularization order and record of service book	"B"	10-17
7.	Copy of memo of appeal	"C"	18-20
8.	Power of Attorney		21
9.	Wakalat Nama		22

Appellant

Mst. Arabistan Bibi AB

Counsel

Iftikhar Ali Khan

Iftikhar Ali Khan

Advocate High Court

Office 3rd Floor, Continental Plaza

Makanbagh, Mingora Swat.

Email:iftikharalikhanadv@gmail.com

Cell No:0345-9514585

①

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

Service Appeal No. 2867 / 2023

9405
24-11-2023

Mst. Arabistan Bibi D/o Sultan Bacha R/o Sakhra, Tehsil Matta,
District Swat. Lady Health Worker (LHW) (BPS-05).
Place of Posting Sakhra, Tehsil Matta
District Swat ... Appellant

- VERSUS -

1. Government of Khyber Pakhtunkhwa through Secretary Health at Peshawar.
2. Director General Health Services, Government of Khyber Pakhtunkhwa at Peshawar
3. District Health Officer, Swat at Gulkada, Saidu Sharif, Swat.
4. District Account Officer Swat at Saidu Sharif, Swat.
5. Finance Officer, LHW Program, Khyber Pakhtunkhwa at Peshawar.

... Respondents

Appeal Under Section 4 of the Service Tribunal Act, 1974.

Respectfully Sheweth;

1. That appellant is the resident of District Swat and was initially appointed as LHWs in the National Program Family Planning & Basic Health, Khyber Pakhtunkhwa (Copy of appointment order is annexure A).
2. That after fulfilling all the codal formalities, appellant joined her service and perform her duties with zeal and devotion and no single complaint had ever been made against her in the entire service till now.

3. That later on services of the appellant was regularized under Regulation of LHW's Program & Employees (Regularization & Standardization) Act, 2014 and entries in the service book was made in this regard (Copies of regularization order and record of service book are annexure B).
4. That arrears i.e. (pay & allowance) from the period 01-07-2012 to 30-11-2015 were paid to other LHW's / LHS's of the same department, so appellant also knocked the doors of this high off for her redressal. It is pertinent to mention here that entry were made in the service book of the appellant regarding the payment of arrears but till now not a single penny has been paid to the appellant and uptill now the arrears to the tune of Rs. 1,63,866/- from 01-07-2012 to 30-11-2015, is outstanding against the department / respondents.
5. That the appellant time and again requested the concerned DHO, Swat, for payment of the subject arrears, which was turned down and the appellant has not yet been paid the same, furthermore, the appellant have been directed to approach this office.
6. That thereafter, the appellant filed department appeal to respondent No. 2, vide office diary No. 24836 dated 25-07-2023, however, the grievances of appellant has not been redressed and no opportunity of hearing has been provided to the appellant. Thus, after completion of the specified period, the appellant approaches this Hon'ble tribunal inter alia on the following grounds (Copy of memo of appeal is annexure C).

GROUND:

- i. That the action, inaction and denial of respondents to pay the outstanding arrears /

allowance to the appellant, is illegal, unlawful and against the fundamental rights of appellant.

- ii. That clear discrimination has been committed with the appellant, which is in violation of the Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- iii. That appellant has the accrued right of payment of arrears / allowances already paid to same scale employees of the same department.
- iv. That the very essence of the Constitution of Pakistan, 1973, i.e. equality before law and equal protection of law, has been violated in case of the appellant.
- v. That employees of the same department and of the same BPS have been paid the allowance & arrears of the same period but appellant was neglected and discriminated, therefore, action, inaction and maltreatment is against the law.
- vi. That the same arrears (pay & allowance) were paid to other employees of the same department and of the same rank (BPS), therefore, appellant may be entitled to be treated alike and may not be discriminated in respect of that arrears / allowances.
- vii. That though the appellant has timely approached the respondents for redressal of her grievances, but till date, the appellant has neither been provided an ample opportunity of hearing nor the appellant has been given her rights i.e. arrears / allowances.

(4)

Viii. That respondent are not authorized to deny/ refuse the payment of arrears / allowances to appellant.

ix. Any other grounds not specifically raised will be argued with prior permission of this august court.

6. That appellant has filed the department appeal / representation on 25/07/2023. and as per law service appeal is to bed filed after 90 day, thus, the instant appeal is filed today, which is well within time.

It is therefore very humbly prayed that, on acceptance of this appeal, the respondent be directed to pay the arrears / allowances of the appellant i.e 1,63,866/- from 01-07-2012 to 30-11-2015 without any delay.

Any other relief which is otherwise deemed proper, lawful, efficacious may also be granted in favour of appellant.

Appellant

Mst. Arabistan Bibi

AB

Counsel:

Iftikhar Ali Khan

Iftikhar Ali Khan

Advocate High Court

(4)

Viii. That respondent are not authorized to deny/ refuse the payment of arrears / allowances to appellant.

ix. Any other grounds not specifically raised will be argued with prior permission of this august court.

6. That appellant has filed the department appeal / representation on 25/07/2023 and as per law service appeal is to be filed after 90 day, thus, the instant appeal is filed today, which is well within time.

It is therefore very humbly prayed that, on acceptance of this appeal, the respondent be directed to pay the arrears / allowances of the appellant i.e 1,63,866/- from 01-07-2012 to 30-11-2015 without any delay.

Any other relief which is otherwise deemed proper, lawful, efficacious may also be granted in favour of appellant.

Appellant

Mst. Arabistan Bibi

AB

Counsel:

Iftikhar

Iftikhar Ali Khan

Advocate High Court

(5)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Arabistan Bibi Appellant

Versus

Govt: of KP and others. Respondents

Certificate

It is certified that no such like other service appeal has earlier been filed before this Hon'ble Court.

Appellant

Mst, Arabistan Bibi

Ab

Counsel:

(Signature)

Iffikhar Ali Khan

Advocate High Court

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

Service Appeal No. _____ / 2023

Mst. Arabistan Bibi.

... Appellant

- VERSUS -


Govt: of KP and others.

... Respondents


Affidavit

I, do hereby solemnly affirm and declares that, all the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed therein from this Hon'ble Tribunal.

ATTESTED


SSS
22.11.2023

Deponent:


Arabistan Bibi

Identified By Counsel:



**Iffikhar Ali Khan
Advocate High Court**

7

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal: _____ / 2023

Mst, Arabistan Bibi Appellant

Versus

Govt: of KP and others. Respondents

Address of Appellant:

Mst. Arabistan Bibi D/o Sultan Bacha R/o Sakhra, Tehsil
Matta, District Swat. Lady Health worker (LHW) (BPS-05)

Appellant through Attorney Javed Ali S/o Feroz Shah R/o
Gunbad Maira Mingora, Tehsil Babozai District Swat.

CNIC No.15602-4655995-1

Cell No.0345-9191837

Address of Appellants:

1. Government of Khyber PakhtunKhwa through secretary Health at Peshawar.
2. Director General Health Service, government of Khyber PakhtunKhwa at Peshawar.
3. District Health Officer, swat at Gulkada, Saidu Sharif, Swat.
4. District Account Officer Swat at Saidu Sharif swat.
5. Finance Officer, LHW Program, Khyber PakhtunKhwa of Peshawar.

Appellant

Mst, Arabistan Bibi AB

Counsel:



Ifikhar Ali Khan

Advocate High Court

Better Copy

وزیر اعظم کا پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

آرڈر برائے انتخاب نیشنل ہیلتھ ورکرز

نمبر شمارہ: 6021/LHW۔۔۔ مورخہ: 30-7-96۔۔۔ ڈی۔ ایچ۔ او آفس۔۔۔ سوات

مقام: سرستان بی بی۔۔۔ زوجہ اختر۔۔۔ الف خان

محلہ: شہید بابا۔۔۔ گاؤں/شہر۔۔۔ بدین

تحصیل: بحرین۔۔۔ ضلع۔۔۔ سوات۔۔۔ صوبہ سرحد

بنیادی مرکز صحت ادیبی مرکز صحت/تحصیل ہیڈ کوارٹر ہسپتال ضلع ہیڈ کوارٹر ہسپتال

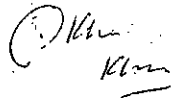
کی سلیکشن کمیٹی کی سفارش پر بطور نیشنل ہیلتھ ورکر برائے ٹریننگ مہارتی

بنیاد پر منتخب کر لیا گیا ہے۔

شرائط برائے انتخاب

- 1- آپ کا انتخاب ابتدائی طور پر پندرہ ماہ کیلئے عمل میں لایا گیا ہے۔
- 2- پہلے بارہ ہفتہ میں متعلقہ ٹریننگ سنٹر آپ کو ٹریننگ ہفتہ میں پانچ دن (اتوار۔ سوموار۔ منگل۔ بدھ اور جمعرات) کو ہوگی۔
- 3- ٹریننگ کے بعد اگلے بارہ ماہ آپ کو اپنے متعلقہ علاقہ میں کام کرنا ہوگا۔ ہر ماہ تین ہفتہ کام کرنے کے بعد چوتھے ہفتے متعلقہ ٹریننگ سینٹر میں رپورٹ/ٹریننگ کیلئے آنا ہوگا۔
- 4- آپ کو بارہ ہفتہ کی ٹریننگ کے دوران پچاس (50) روپے یومیہ اور اسکے بعد ہر ماہ بارہ سو (1200) روپے ماہوار اعزازیہ دیا جائیگا۔
- 5- آپ کا انتخاب آپ کے مستقل رہائشی علاقہ کیلئے ہے۔ اور دوران ٹریننگ و کام آپ کی کہیں تبدیلی اثرانفر نہیں ہوگی۔
- 6- دوران ٹریننگ و کام متعلقہ انچارج بنیادی مرکز صحت ادیبی مرکز صحت/تحصیل یا ضلعی ہیڈ کوارٹر ہسپتال آپ کی کارکردگی کو زیر رکھے گا۔ جس کی رپورٹ وہ وقتاً فوقتاً پہنچائے گا۔
- 7- انتخاب کے بعد جب بھی پتہ چلا کہ آپ کے انتخاب کے کوائف جمع نہیں ہیں یا پروگرام کے دوران کسی وقت بھی آپ کی کارکردگی غیر تسلی بخش رہی تو آپ کو بغیر نوٹس کے فارغ کر دیا جائیگا۔ اور اس سلسلے میں آپ کسی قسم کی قانونی چارہ جوئی کی حقدار نہیں ہوگی۔
- 8- اگر آپ کی کارکردگی تسلی بخش رہی تو آپ کی انتخابی معاہدہ میں توسیع ہوتی رہے گی۔ جو 1990 تک رہ سکتا ہے۔
- 9- آپ کو پروگرام کے دوران گاہے گاہے جاری ہونے والے تمام ہدایات پر عمل کرنا ہوگا۔
- 10- آپ کو ہدایت کی جاتی ہے کہ آپ مورخہ 1-8-96 کو صبح 8:30 بجے ٹریننگ سینٹر BHU تیرات۔۔۔ میں رپورٹ کریں۔ اگر آپ مقررہ وقت پر حاضر ہونے سے قاصر رہیں تو آپ کا انتخاب خود بخود ختم سمجھا جائیگا۔

C.T.C



BETTER COPY

Health Department, Khyber Pakhtunkhwa
Lady Health Workers Program
District Programme Implementation Unit, Swat
OFFICE OF THE DISTRICT HEALTH OFFICER, SWAT

NOTIFICATION

In Term of Section 4 (1) read with 1st Provision there under, of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Programme and Employees (Regularization and Standardization) Act 2014 Services of the following Lady Health Workers Programme Employees of District Swat Khyber Pakhtoon Khwa are hereby regularized w.e.f. 1st July 2012. Their terms and conditions of services will be governed under the Khayber Pakhtunhwa Regulation of Lady Health Workers Programme and Employees (Regularization and Standardization) Act 2014 and rules to be made there. FLCF Wise Detail of staff who are to be regularized are given below:

S.No	Name of Community Embedded	Father Name	Husband Name	Des:	Date of appointment	FLCF	Name of Catchment Area
1	Mumikat	Sardar Ali	Farkhzad	LHW	01/08/1996	BHU Darmai	Malak Abad Ningolai Teh. Distt: Swat
2	Arabestan	Sultan Bacha	Ali Jan	LHW	09/08/1997	BHU Darmai	Sakhra
3	Rahirat	F:	Bakht Beland	LHW	29/07/1998	BHU Darmai	Village Landi Garhy, Landi Garhy
4	Asma	F:	Khaista Mohd.	LHW	15/09/2001	BHU Darmai	Village Darmai Sakhra
5	Bibi Fatma	F:	Abdul Malik	LHW	01/04/2002	BHU Darmai	Village Azad Bandai
6	Shakhi Muslaim	Sher Mohammad		LHW	01/02/2003	BHU Darmai	Village Adam Shah
7	Bacha Hayat	Munawar Khan		LHW	01/02/2003	BHU Darmai	Village Nokahara
8	Shamim Begum	Shah Faisal		LHW	02/02/2003	BHU Darmai	Village Kalakot Bar Palow
9	Roshna	Shafullah		LHW	02/12/2003	BHU Darmai	Village Darmai
10	Robina	Sohail	Abdullah	LHW	15/07/2005	BHU Darmai	Darmai Matta Swat
11	Saima	F:	Gulab	LHW	15/07/2005	BHU Darmai	Garity Shaga Gham. Dashagram
12	Abida	M. Zahid	Inzar Gul	LHW	15/04/2006	BHU Darmai	Sakhra
13	Jehan Pari	Mian Said Ahmad		LHW	17/08/2007	BHU Darmai	Doshagram

District Health Officer

Swat At Gulkada

C.T.C

(Signature)
Khan

Better Copy

Health Department, Khyber Pakhtunkhwa
Lady Health Workers Program
District Programme Implementation Unit, Swat
OFFICE OF THE DISTRICT HEALTH OFFICER, SWAT

Sub: Issuance of Individual Notification to the Employees of LHWs Programme.

In compliance with the decision taken in the meeting under the Chairmanship of Secretary Health Khyber Pakhtunkhwa dated 18/9/2014 and letter No. Nil dated nil of the Provincial Coordinator LHW Programme for F/P & PHC KPK Peshawar. Enclosed Please confined herewith Facility Wise Notification of the Employees of LHWs Programme for kind information and further necessary action please.

Similarly in exercise of powers confined under sub section (2) of the Section Ibid, the Community Embedded Employees are placed in the following pay Scales

Name of Post	Basic Pay Scale
Lady Health Supervisor	7
Lady Health Worker	5
Driver	4

District Health Officer
Swat At Gulkada

Endst No. 11232/LHW/R/Dated 20/9/2014
Copies forwarded to the:

1. The Director Health Services, Health Directorate Peshawar for kind information and further necessary action with reference to the meeting held with the Secretary Health Khyber Pakhtunkhwa on 18/9/2014 please.
2. Provincial Coordinator LHW Programme for F/P & PHC KPK Peshawar for kind information and further necessary action with reference to the letter No. nil dated nil please.
3. Incharge of FLCF concerned for information.
4. District Accounts Officer Swat for information.

District Health Officer
Swat At Gulkada

C.T.C

Ok

Khan

Health and Age Certificate

12



Name of Official Arbistan Bih

Religious Performed Paklan

Resident Village Sakhsa P.O. Sakhsa Tehsil Matla District Swat

Father Name Alif Jan Address Kolatali kis Sakhsa

Date of Birth (In words & Figure) 18-2-1982 (Eighteen February Nineteen Eighty two)

Exact high by measurement 5 Feet 0 Inch

Marks of Identification Nil

Signature of Official Arbistan Bih

Signature of Head of Office [Signature]
District Health Officer
District Swat

I do hereby certify that I have examined Mr./Miss Mrs. Arbistan
Candidate for employment in the office of DHO Swat and cannot discover that her/She any
disease constitution effect body except HIV

I do not certify this disqualification for employment as LHW according to her
statement 39 year and by appearance is Thirty two (32) yrs

Left hand thumbs Impression

First Figure Second Figure Third Figure Small Figure Thumb

Taken before [Signature]
Examination Medical Officer,

With Official Stamp
Dated 6/2/14

Medical Officer Superintendent
Saidu Bata Group of Hospitals
Saidu Sharif Swat

6/2/14

C.T.C

[Signature]

1. Entries on this page should be re-nued or re-attested at least every five years and the signature to lines should be dated.

13

Name: ARABISTAN BT BT

Race: Afghan

Residence: Sakhrā, plo Sakhrā
Takhar, malla Swat


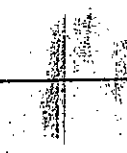



Father's Name and residence: Alif Jan
W/o Sultan Barch Sakhrā plo Sakhrā Teh Malla Swat

Date of birth by christian era as nearly as can be ascertained: 18/2/1982 (18 Feb Nineteen Eighty Two)

Exact height by measurement: 5 feet

Personal marks for identification: N/A

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger:		Ring Finger:	
Middle Finger:		Fore Finger:	
Thumb:			

C.T.C
Arbab Khan

Signature of Government Servant: Arabistan

Signature and designation of the Head of the officer, or other Attesting Officer: Special Health Officer
DISPT-SWAT.

(For Use in Police Department Only)

No. 9 an

Heirs,

1. _____
2. _____
3. _____

Verification Roll No:

dated

received back

Left Thumb Impression

① Passed SSC Examination
 In 2000 Under R-NO: 3938
 Marks obtained 318 / 850 BISE Swat

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L Or B.A	
Urdu		Pleadership Examination	
Plan-drawing		Training School Final Examination	
Finger Print		Other qualification	
Drill Instructing			
Court Duties			
Reserve Duties			

[Signature]
 District Health Officer
 DISTT-SWAT

N.B Line t be drawn under the qualification possessed

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

14

Not
9 am

1	2	3	4	5	6	7	8
Name of Post	Substantive 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 CSR	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Government servant
L.H.W Lady Head Clerk			Rs 1200/PM (Paid)			30/7/96	EN Arabist am
(Rs 560-260-13000) BPS-5			Rs 5400/PM			1/7/2012	EN Arabist am
do			Rs 5400/PM			1/12/2012	EN Arabist am
do			Rs 5660/PM			1/12/2013	PA Arabist am
do			Rs 5990/PM			1/12/2014	PA Arabist am
							C.T.S D. Khan

Signature and Designation of the head of the office or other attesting officer in attesting columns 1 to 8

Signature and Designation of the head of the office or other attesting officer in attesting columns 1 to 8

District Health Officer
Distt: Swat

District Health Officer
Distt: Swat

District Health Officer
Distt: Swat

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		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
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit able to another Government		
				Period	Government to which debit able		
<i>[Signature]</i> District Health Officer Distt: Swat					Appointed as LHW vide DHO Swat order No 6921 Dated 30/7/96 and accordingly submitted arrival Report for field duty.		
				Service Verified from 30/7/96 to 30/6/2012			
						<i>[Signature]</i> District Health Officer Distt: Swat	
						issued notification order no by the DHO Swat for the Regularization of staff vide No. 11232 LHO dated 29/9/2014 W.P.F 1/7/2012 in view of approval granted by the pc LHW program through letter No. 1340/pc.	
						<i>[Signature]</i> District Health Officer Distt: Swat	
<i>[Signature]</i> District Health Officer Distt: Swat	20-11-2012	Annual increment not allowed			Service Verified from 1/7/2012	30/11/2012	
<i>[Signature]</i> District Health Officer Distt: Swat	30/11/13	Granted Annual increment			Service Verified from 1/12/2012	30/11/2013	
						<i>[Signature]</i> District Health Officer Distt: Swat	
<i>[Signature]</i> District Health Officer Distt: Swat	30/11/14	Granted Annual increment			Service Verified from 1/12/2013	30/11/2014	
						<i>[Signature]</i> District Health Officer Distt: Swat	
<i>[Signature]</i> District Health Officer Distt: Swat							<i>[Signature]</i> District Health Officer Distt: Swat

15

1	2	3	4	5	6	7	8
Name of Post	Substantive 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"	Day of Appointment	Signature of Government servant
LHW, BPS-5 6985-340-17185			Rs. 7665			1/7/2015	PN
-do-			Rs. 8005			1/12/2015	FN
LHW BPS-5 89-8590-420-2190			Rs. 9850/-			1/7/2016	FN
-do-	7665/15 9850/16						
-do-			Rs 10270/-			1/12/2016	FN
							C.T.C Dhanu Khan

Signature and Desk

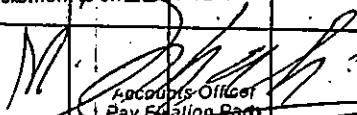
9

Signature and D of the head of it or other attes in attes in columns 1

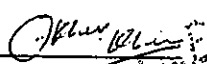
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District

9		11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		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
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit able to another Government		
				Period	Government to which debit able		
						Pay Revised up graded from BPS 5 & BPS Vide Govt. of Khyber Pakhtunkhwa Finance Department Notification No.FD/SO/PR-7-20/2015 Dated: 30/06/2015 and RC/FD/SO(FR) 7-20/2015 dt: 17/08/2015	
	30/11/2015	Annual/Increment Allowed				Services Verified From 1/12/2014 To 25/11/2015	
<i>J. Ahmad</i> District Health Officer Distt: Swat			<i>J. Ahmad</i> District Health Officer Distt: Swat			<i>J. Ahmad</i> District Health Officer District Swat.	
				Token No. T-73			
				Dated: 1/11/15			
				Drawn Pay+allowances w.e.f 1-7-2016-31-8-2016			
				Gross Amount Rs. 3006/-			
				Deduction Rs. 116/-			
				Net Amount Rs. 31290/-			
						<i>J. Ahmad</i> D.A.O Swat.	
	30/11/2016	Annual/Increment Allowed				Services Verified From 1/12/2015 To 30/11/2016	
<i>J. Ahmad</i> District Health Officer Distt: Swat			<i>J. Ahmad</i> District Health Officer Distt: Swat			<i>J. Ahmad</i> District Health Officer District Swat.	

2	1	2	3	4	5	6	7	
Name of Post	Substantive 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 CSR	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Government servant	
		Office of the Accountant General, Khyber Pakhtun Khwa, Peshawar						
		Pay Fixed in the Revised Basic Pay Scales						
		6985-340-17185						
		Pay Fixed @ Rs. 7685/-					(S)	
		R.B.P.S 8590-400-B-21190					(S)	
		Pay Fixed @ Rs. 9850/-						
		Date of Next increment 01-12-2016						
		 Accounts Officer Pay Fixation Party Peshawar						
		CHW BPS-5-						
		(10260-500-25260)	Rs 12260/=				7/2017	
		do-	Rs 12760/=				12/2017	

Signature and Des of the head of the or other attesting in attesting column 1 to

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1	2	3	4	5	6	7	8
Name of Post	Substantive 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"	Day of Appointment	Signature of Government servant
		<p>2017 Office of the Accountant General Khyber Pakhtunkhwa Peshawar Pay Fixed in The R.B.P.S. 2017</p>					
		<p>R.B.P.S. 10260-520-25260(B)</p>					
		<p>At Rs. 12260/- P.M.W.E.F 1.07.2017 With Next Increment On 1.12.2017</p>					
		<p>Accounts Officer Pay Fixation Party K. Pakhtunkhwa Peshawar</p>					
						<p>1/12 2018</p>	
							<p>C.T.C Chohan</p>

Signature and De
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To,

The Director General, Health Services,
Government of Khyber Pakhtunkhwa
At Peshawar.

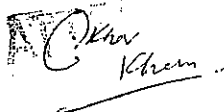
Subject: Departmental Appeal for payment of arrears (pay & allowance) from the period effect from 01-07-2012 to 30-11-2015, to the petitioners and treated the petitioners alike on the same yardstick like other employees of the same department.

Respected Sir,

The petitioners submit as under;

1. That petitioners are the resident of District Swat and were initially appointed as LHWs in the National Program Family Planning & Basic Health, Khyber Pakhtunkhwa in the year 2005-06.
2. That after fulfilling all the codal formalities, petitioners join their services and perform their duties with zeal and devotion and no single complaint had ever been made against them in the entire service till now.
3. That later on services of the petitioners were regularized under Regulation of LHW's Program & Employees (Regularization & Standardization) Act, 2014 and entries in the service book were made in this regard.
4. That arrears i.e. (pay & allowance) from the period 01-07-2012 to 30-11-2015 were paid to other LHW's / LHS's of the same department, so petitioners also knocked the doors of this High on for their redressal. It is pertinent to mention here that entry were made in the service books of the petitioners regarding the payment of arrears but till now not a single penny were paid to the petitioners.

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5. That employees of the same department and of the same FPS have been paid the allowance & arrears of the same period but petitioners were neglected and discriminated, therefore, action, inaction and maltreatment is against the law.
6. That the same arrears (pay & allowance) were paid to other employees of the same department and of the same rank (BPS), therefore, petitioners may be treated alike and may not be discriminated in respect of that arrears / allowances.
7. That the petitioners time and again requested the concerned DHO, Swat, for payment of the subject arrears, which was turned down and the petitioners have not yet been paid the same, furthermore, the petitioners have been directed to approach this office.
8. That, the instant request may please be considered as departmental appeal / representation.

It is therefore, humbly requested that on acceptance of the subject appeal, arrears i.e. pay & allowance of the petitioners, may kindly be handed over to them.

Any other remedy to which the petitioners are entitled, may also be awarded.

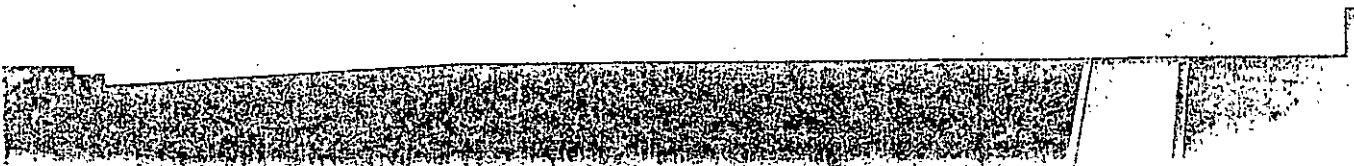
Petitioners

- | | | | |
|---------------------------------|-------------------------|------------------------|------------------------|
| 1) Mst. ShehnaZ Bibi | 2) Mst. Shehnaz | (3) Mst. Sairna | (4) Mst. Jehan Siful |
| 5) Mst. Rawasia | (6) Mst. Arabistan Bibi | (7) Mst. Ashrafia Bibi | (8) Mst. Abida |
| 9) Mst. Neeium | (10) Mst. Rabia | (11) Mst. Hussan Pari | (12) Mst. Bacha Zehnat |
| 13) Mst. Waqif Shahi | (14) Mst. Farzana | (15) Mst. Saima Bibi | (16) Mst. Farheenat |
| 17) Mst. Saleem Akhtar | | | |

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Note: List of the amount / arrears of each candidate is attached herewith.

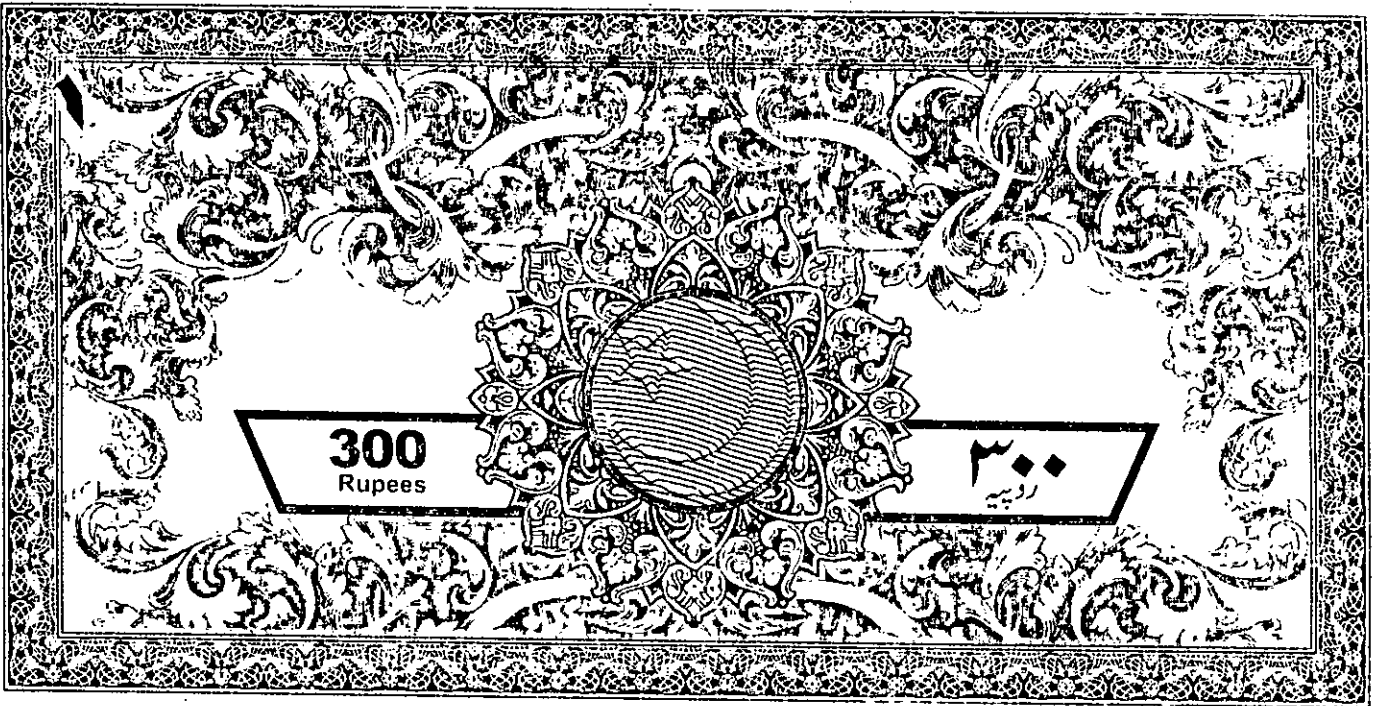


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LIST OF ARREARS OF THE PETITIONERS

S.No	Name	Designation	Amount of arrears with period
01.	Mst. Shehnaaz Bibi	LHW (BPS-5)	Rs. 31,290/- from 01-07-2016 to 31-08-2016
02.	Mst. Shehnaz	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
03.	Mst. Saima	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
04.	Mst. Jehan Sifat	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
05.	Mst. Rawasia	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
06.	Mst. Arabistan Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
07.	Mst. Ashrafia Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
08.	Mst. Abida	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
09.	Mst. Neelam	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
10.	Mst. Rabia	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
11.	Mst. Hussan Pari	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
12.	Mst. Bacha Zeenal	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
13.	Mst. Waqif Shah	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
14.	Mst. Farzana	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
15.	Mst. Saima Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
16.	Mst. Farhana	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
17.	Mst. Saleem Akhtar	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015

CTC
(Signature)



مختار نامہ خاص

سکتہ اختیار دہندگان (۱) مسماۃ سلیم اختر دختر لیاقت علی سکندر شین تحصیل خواہ خیلہ ضلع سوات (۲) مسماۃ نرمانہ دختر امیر زادہ سکندر گاڑی گٹھی شوزنی تحصیل خواہ خیلہ ضلع سوات (۳) مسماۃ واقف شاہ دختر سر بالا میاں سکندر قندیل تیرات تحصیل بحرین ضلع سوات (۴) مسماۃ اشرافیہ بی بی دختر سید رحمان سکندر گاڑی لندیکس تحصیل خواہ خیلہ ضلع سوات (۵) مسماۃ باچا زینت دختر شیرین سکندر ملا بابا گٹ بر شور تحصیل ضلع سوات (۶) مسماۃ حسن پری دختر عبدالودود سکندر چینہ جماعت میاندم تحصیل خواہ خیلہ ضلع سوات (۷) مسماۃ نغمہ دختر انتہار گل سکندر تندو ڈاگ (حال) گنبد میرہ پیوڑہ تحصیل بابوزئی ضلع دات (۸) مسماۃ عربستان بی بی دختر سلطان باچا سکندر سترہ تحصیل ضلع سوات (۹) مسماۃ دروایدہ دختر زرمینوش سکندر نیوکالونی تحصیل ضلع سوات (۱۰) مسماۃ جہان صفت دختر عبداللہ جان سکندر داملی مدین تحصیل بحرین ضلع سوات (۱۱) مسماۃ مریم بی بی دختر بابون صاحبہ سکندر جٹا کوڑیلو باہریہ تحصیل ضلع سوات (۱۲) مسماۃ فرحانہ زوجہ محمد انور سکندر شلتا کو تحصیل چارباغ ضلع سوات (۱۳) مسماۃ شہناز بی بی دختر خیر خان سکندر محلہ برکے تحصیل خواہ خیلہ ضلع سوات (۱۴) مسماۃ عابدہ دختر محمد سکندر سرخوند دیوٹی تحصیل کبل ضلع سوات (۱۵) مسماۃ صائمہ دختر بخت روان سکندر محلہ برپوخری تحصیل ضلع سوات (۱۶) مسماۃ رابعہ دختر فضل حسین سکندر میاندم تحصیل خواہ خیلہ ضلع سوات (۱۷) مسماۃ صائمہ بی بی دختر بخت روان سکندر ماکڈیگرام تحصیل چارباغ ضلع سوات کے ہیں۔ ندیں وقت بھانگی ہوش و حواس خستہ برضا مندی بخوشی اقرار کر کے لکھ دیتے ہیں۔ کہ میں مقرران ایک سروس ایجیل سروس ٹریبونل میں دائر کرنا چاہتے ہیں، چونکہ مقرران بعد مصروفیات و زمانہ ذات ایجیل ہذا کی اصالتاً کے بیرونی سے قاصر ہیں۔ بدیں وجہ مقرران اپنی جانب سے سسی جاوید علی ولد فیروز شاہ سکندر گنبد میرہ منکورہ تحصیل بابوزئی ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتے ہیں۔ کہ وہ ہذا تہی یا بذریعہ وکیل بیرسٹرز عدالت ابتدائی سروس ٹریبونل نا عدالت عظمیٰ سپریم کورٹ آف پاکستان یا دیگر عدالت ہائے مروج کرے اور کر دئے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے۔، ایجیل۔ گمرانی۔ نظر ثانی۔ رٹ پٹیشن دائر کرے اور کر دئے یا مقدمہ ہذا ریماٹڈ ہونے کے صورت میں ماتحت عدالت میں کارروائی کرے۔ وکالت نامہ تصدیق کرے، برائض کی تصدیق کریں، درخواست فریق مقدمہ وغیرہ دائر کریں، درخواست اخراج مقدمہ دائر کریں۔ فہرست گواہان داخل کریں شہادت پیش کریں، اہل کمیشن مقرر کریں، اہل کمیشن کے ساتھ بر موقع کارروائی عمل میں لائیں، عذر دات داخل کریں، شہادت خاص مقرران کی طرف سے راضی نامہ کریں ثالثی قبول کریں، صلح مقرر کریں بیان طغنی دیوے، تحریر و زبانی بیان دیوے، تریسی جواب دیوے/ فیصلہ ڈگری ہونے کی صورت میں کارروائی اجراء دائر کریں۔ عدالت موصوف کے علاوہ اپنا درہائی کورٹ اور عدالت عظمیٰ سپریم کورٹ آف پاکستان جو بھی ضروری اور قانونی کارروائی ہو عمل میں لائیں۔ مقدمہ ریماٹڈ ہونے کی صورت میں مقرران موصوف کو بھی یہی تمام اختیارات بعد از ریماٹڈ حاصل ہونگے جو کہ آج مقرران موصوف کو دئے گئے۔ الفرض جملہ کارروائی باہر مقدمہ ہذا امن مقرر کو قبول و منظور ہوگی۔ لہذا مختار نامہ سنداً تحریر ہے۔ البر توام: 16/11/2023

TESTED



بد Asghar الع
مسماۃ اشرافیہ بی بی

بد Shah الع
مسماۃ واقف شاہ

بد Fogara الع
مسماۃ نرمانہ

بد Saleem الع
مسماۃ سلیم اختر

بد Ab الع
مسماۃ باچا زینت

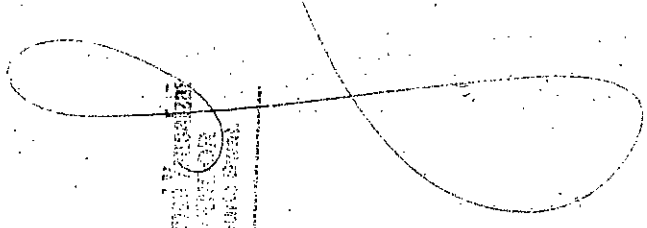
بد Muhammad الع
مسماۃ نغمہ

بد KL الع
مسماۃ حسن پری

بد Saleem الع
مسماۃ باچا زینت

16.11.2019

عبارتوں کی ترمیمی عملے کا جی ایم ایس آر ایس کا



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Stamp
Director General
Date

فرخانیہ الع Ms. Farzana مسماة فرغانہ
Maryam الع Maryam مسماة مریم بی بی
Tehena SH&T الع Tehena SH&T مسماة تہنا مفت
Rusida الع Rusida مسماة روایبہ

Shahid الع Shahid مسماة شاہد بی بی
Saima الع Saima مسماة سائمہ
S. Naz الع S. Naz مسماة سناز بی بی
S. Naz الع S. Naz مسماة سناز بی بی

گواہ شہد افضل خان




شیر افضل خان ولد عزیز الرحمن

شناختی کارڈ: 3-15602-7538465

گواہ شہد

امیر علی خان ولد شیر علی خان

شناختی کارڈ: 7-15602-7161460

بار کونسل نمبر: bc-11-2251 بار ایسوسی ایشن نمبر: 132025 رابطہ نمبر: 0347-957-8787 ای میل ایڈریس: ۷۷	  
ڈسٹرکٹ بار ایسوسی ایشن سوات	

بعدالت جناب: سر جسٹس ٹریبونل بحکم لیساور

منجانب: ایڈووکیٹ  طرہی سستان بی بی بنام ضلع سوات	دعویٰ اور خواست: سر جسٹس اپیل علت نمبر: مورخہ: جرم: تھانہ:
بابت تحریر آگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سر جسٹس ٹریبونل کیلئے اختیار کی جانے والی دعویٰ اور خواست کے مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو مکمل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب، دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمارے یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،

لہذا وکالت نامہ لکھ دیا کہ سدر ہے

مقام سر جسٹس ٹریبونل ضلع سوات لیساور کے لئے منظور ہے۔

ایڈووکیٹ عزیز محمد عتیق خاص صاحب لیسوری

ایڈووکیٹ مسماہ عسکری سستان لیسوری

ایڈووکیٹ

ایڈووکیٹ ادستخط:

22/11/23

المقوم: