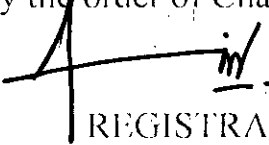


FORM OF ORDER SHEET

Court of _____

Appeal No. 2565/2023

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. Farzana resubmitted today by Mr. Iftikhar 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. Farzana 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. 3685 /S.T.

Dt. 24-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Iftikhar Ali Adv.
High Court Swat.

all the objection are removed



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

Service Appeal . 2565 / 2023

Mst, Farzana 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 - 119
6.	Copies of regularization order and record of service book	"B"	12 - 19
7.	Copy of memo of appeal	"C"	20 - 22
8.	Power of Attorney		23
9.	Wakalat Nama		24

Appellant

Mst. Farzana Farzana

Counsel
Iftikhar Ali Khan

Iftikhar Ali Khan

Advocate High Court

Offitce 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. 2565 / 2023

Public Health Officer
District Swat

Roll No. 9404

Dated 24-11-2023

Mst. Farzana D/o Amir Zada R/o Gari, Gharai, Shamoza, Tehsil
Khwazakhela, District Swat. Lady Health Worker (LHW) (BPS-05).
Place of Posting Gari, Gharai, Shamoza
Tehsil Khwazakhela, 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.

②

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.

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.

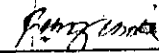
6. That appellant has filed the department appeal / representation on 25/07/2023 and as per law service appeal is to be filed after 90 day, thus, the instant appeal is filed today, which is well within time.

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. Farzana



Counsel.



Iftikhar Ali Khan

Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Farzana 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, Farzana Farzana

Counsel:



Iftikhar Ali Khan
Advocate High Court

6

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ / 2023

Mst. Farzana.

... Appellant

- VERSUS -

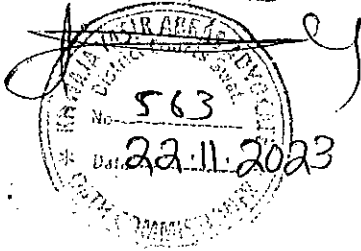
Govt: of KP and others.

... 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



Deponent:

Farzana
Farzana

Identified By Counsel:

Iffikhar Ali Khan
Advocate High Court

7

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Farzana Appellant

Versus

Govt: of KP and others. Respondents

Address of Appellant:

Mst.Farzana D/o Amir Zada R/o Gari Gharai, Shamoza
Tehsil Khwazakhela 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 at Peshawar. -

Appellant

Mst, Farzana Farzana

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court



5602-0393103-0



~~District
 Lines
 Q. E...
 Dist. Swat. BHO Chuhgal, Swat.~~

 Medical Officer

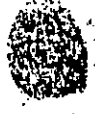
8

Post for me please

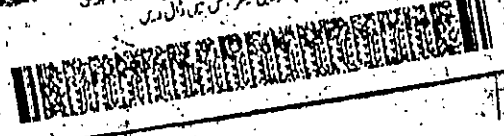
15602-0393163-0
T4Z2Z

1147880487

سنگ پت ایسٹ



30/11/2024
24/12/2010



Office Order

Subject:- Appointment Order for Lady Health Worker under Prime Minister's Programme For Family Planning and Primary Health Care.

On the recommendation of selection committee, Miss/Mrs. Faz Bana

D/o, W/o Amir Zada

of village/monara Gankot

is hereby appointed as Lady Health Worker (LHW) in DPU Swat w.e. 15/4/2001 on the following terms and conditions:

1. The appointment will be purely on contract basis.
2. The appointment will be initially for one year. However it is extendable subject to satisfactory performance.
3. After selection, she will be trained for a duration of 15 months. In the first 03 months, she will attend training at the health centre for 05 days a week, while during the next 12 months, she will work in her catchment area for 03 weeks every month and will attend the training session at the health centre in the 4th week of every month.
4. She will be paid Rs.50/- per day during initial three months of training and subsequently she will be given a stipend of Rs.1,200/- per month.
5. She will have to work in this programme for at least one year after completion of training for which she will have to give surety bond at the time of joining training on stamp paper of Rs.50/-. If she wishes to resign within this period, she will have to deposit the whole amount of salary which she has received during training and service until acceptance of resignation.
6. On expiry of surety bond period, if she wishes to resign, she will serve one month's notice or will deposit one month's salary in lieu of notice.
7. The post is non-transferable and the services will be terminated if the LHW move out of her area of appointment.

She will be required to establish a health house in her residence and maintain it according to the requirements of the programme. She will work closely with the local community and establish a local health committee and a women group with the assistance of the Field Supervisor and Health Centre staff.

9. She will ensure her presence during the field visits of supervisors and will arrange home visits for them.
10. She will be required to open a bank account in the branch of bank nearest to the training centre. The branch will be identified by the district PIU. Her salary will be disbursed through this bank.
11. She will keep a proper record of supply and receipt from the health centre and will also maintain a proper record of consumption of the supplies and will provide this to the health centre every month at the time of receiving new supplies.
12. She will maintain a proper record of the money being earned through the sale of contraceptives (condoms and pills). She will be required to submit the details of money every month to the health centre. If she is found guilty of wrong reporting or selling the contraceptives to the unauthorised persons or shops, her services will be terminated alongwith other disciplinary action including the recovery of the amount involved.
13. She will submit a monthly report of her activities on the prescribed form to the health centre regularly.
14. She will be entitled for 20 days casual leave in a year. However, there will be no leave during training, and if she abstain herself unauthorisedly, her services will be terminated. She will be required to take the sanction of leave from the health centre.
15. She will be entitled for 20 days maternity leave at one time which will commence 10 days before the delivery date until 10 days after the delivery. After this, she will resume her duties from her health house and then start field visits not later than one month from the date of delivery.
16. TA/DA will not be admissible on account of attending training or undertaking any field visit.

It is established that she has given wrong information on
name, age, place of residence and other criteria, her services
terminated without any notice and the amount spent on her
training and salary will be recovered.

Her services will not be governed under the Civil Servants Act 1973,
but under the terms and conditions of this contract and any other terms
that may be communicated to her from time to time. She will be bound
to follow these terms which will not be challengeable at any forum
including courts:

19. Her services can be terminated at any time without assigning any
reasons or notice.
20. If she accepts the offer on the above terms and conditions, she is
directed to report for training at _____
failing which the offer will stand cancelled.

No. 11082

Date 15/9/2001

15/9/2001

DISTRICT COORDINATOR,

N.P. For FIP AND PHC.

DISTRICT SWAT.

Executive Distt. Officer (Health)
Sub-District Health Officer

1. National Coordinator, Prime Minister's Programme for Family Planning and
Primary Health Care, 14-D, Feroze Centre, West Blue Area, Islamabad.
2. Provincial Programme Coordinator, Prime Minister's Programme for Family
Planning and Primary Health Care.
3. District Coordinator, Prime Minister's Programme for Family Planning and
Primary Health Care.
4. The Accountant
5. Official concerned.

Health Department, Khyber Pakhtunkhwa
Lady Health Workers Program

District Programme Implementation Unit, Swat
OFFICE OF THE DISTRICT HEALTH OFFICER SWAT



12

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 Khyber Pakhtunkhwa 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	Dilraz	Sulman	Haya Gul	LHS	02/05/2013	BHU Chungai	Qila Chowak Zara Kheja District Swat
2	Kalsoom	F:	Shah Taj	LHW	02/08/1998	BHU Chungai	Thirung Shamoza.
3	Izza	Ejaz Ali		LHW	15/09/2001	BHU Chungai	Zarakila Shamoza.
4	Furzana	F:	Amir Zada	LHW	15/09/2001	BHU Chungai	Gamcoat Shamoza.
5	Fazilat	F:	Zora War Khan	LHW	15/09/2001	BHU Chungai	Thirung Shamoza.
6	Shulleen	Abdul Kamal		LHW	01/07/2004	BHU Chungai	Master Abad Chungai
7	Saria Gul	F:	Khalsta-Gul	LHW	01/07/2004	BHU Chungai	Master Abad Shamoza Swat
8	Shabnam	F:	Fazal Rabai	LHW	15/07/2005	BHU Chungai	Tairang Khwar
9	Nizakat	F:	Ithihar	LHW	01/04/2007	BHU Chungai	Village Zarakhela Shamoza
10	Nazia	F:	Mohd. Yar	LHW	01/04/2007	BHU Chungai	Village Chungai
11	Gulshan	Sarfaraz		LHW	15/10/2010	BHU Chungai	Chungai
12	Tawsif	Noor Ul Hadi		LHW	15/10/2010	BHU Chungai	Zarakhela
13	Aisha	F:	Abdul Shakoor	LHW	15/10/2010	BHU Chungai	Talang

District Health Officer
Swat At Gulkada

District Commissioner
LHWs Program
District Swat

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

13

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

In compliance with the decision taken in the meeting under the Chairmanship 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 find herewith Facility Wise Notification of the Employees of LHWs Programme for kind information and further necessary action please.

Similarly in exercise of powers conferred 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

sd
District Health Officer
Swat At Gulkada

No. *11239* /LHW/RJ Daetd *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 Account Officer Swat for information.

J
District Health Officer
Swat At Gulkada

M
District Coordinator
LHWs Program for
District Swat

(14)



Health and Age Certificate

Name of Official Farzana

Religious Performed Islam

Resident Village Ganket P.O. Phoran Tehsil Banikut District Swat

Father Name Amir Zada Address Ganket Shonizai Swat

Date of Birth (In words & Figure) (20-12-84) (20th - Dec - Eighty four)

Exact high by measurement 5 Feet 4 Inch

Marks of Identification NIL

Signature of Official _____

Signature of Head of Office _____ *[Signature]*

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

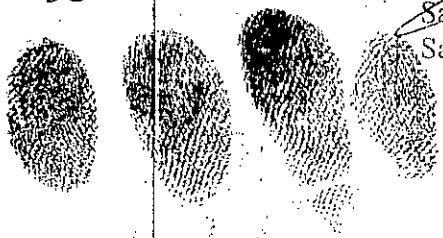
I do not certify this disqualification for employment as LHW her according to
 her statement (29) year and by appearance is Twenty nine (29) year

Left hand thumbs Impression

First Figure	Second Figure	Third Figure	Small Figure	Thumb
--------------	---------------	--------------	--------------	-------

Taken before OK
 Examination Medical Officer, She is physically and mentally
well and at the time of
examination

With Official Stamp
 Dated _____



[Signature]
 Medical Superintendent
 Saidu Group of Hospitals
 Saidu Sharif Swat

4.1.14

Note: The entries on this page should be re-n^owed or re-attested at least every five years and the signature to lines 1 and 10 should be dated.

1. Name: FARZANA

2. Race: Muslim Islam

3. Residence: village Chauri P.O. Zawalwala Shanyji Swat

4. Father's Name and residence: AMIR ZADA
As above

5. Date of birth by christian era as nearly as can be ascertained: 20-12-1984
(20th December N.H. Eighty Four)

Exact height by measurement: 5-8

Personal marks for identification: NIL

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

Little Finger:



Ring Finger:



Middle Finger:



Fore Finger:



Thumb:



Signature of Government Servant:

[Handwritten signature]

Signature and designation of the Head of the officer, or other Attesting Officer:

[Handwritten signature]
District Head SWAT
DISTRICT SWAT

(For Use in Police Department Only)

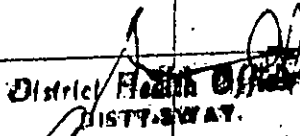
Page: The
and 10:

Heirs,

1. _____
2. _____
3. _____

Verification Roll No: _____ dated _____ received back _____

Left Thumb Impression

	Qualification	Date	Ex:
① Passed SSC(A) Examination 2006 Urdu Roll No. 5080 marks obtained 585/1050 and Division from BISE Saidu Sharif Swat English	First Arts		Per
② Passed F.A (U) Exams 2008 Urdu Roll No. 82380 marks obtained 502/1100 and Division from BISE Saidu Sharif Swat Urdu	B.L Or B.A Pleadership Examination		Left of T
③ Plan-drawing	Training School Final Examination		Litt
Finger Print	Other qualification		Midd
Drill Instructing  DISTT. SWAT.			Thurn
Court Duties			Sign
Reserve Duties			Signat
			Head o
			Officer

1	2	3	4	5	6	7	8	9
Name of Post	Substitute whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) Whether service credit for position under Art. 371 CSR	Pay in Substitute Post	Additional pay for officiating	Other emoluments under the term "Pay"	Day of Appointment	Signature of Government servant	Signature and Designation of the Head of the office or person authorizing the officiating of Government Servant
Leadly Health Nurse ELICA			Rs 1200/-	PM		20-8-2001	[Signature]	
[Signature]								
[Signature]			Rs 5600/-	P.M		12-8-2001	[Signature]	
[Signature]								
-DO-			Rs 5400/-			12-8-2001	[Signature]	[Signature] District Officer District
-DO-			Rs 5600/-			12-8-2001	[Signature]	[Signature] District Officer District
[Signature]							[Signature]	[Signature] District Officer District

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		
<p>7/1/2011 50 31 11/11</p>				Appointed as	LHW	in the NP vide DHO Swat office	
				Order No	11083	and accordingly submitted her arrival Report at BHUC/ICD	
				Service Verified from	1/10/2011	to	30/6/2012
				<p>On 22/9/2014 is issued order for the Regularization of ... W.E.F 1/7/2012 in view of P.C LHW Programme M.F. Dated 29/9/2014</p>		<p>letter No.11 232/LHW granted by the through letter No 1340/C</p>	
				<p>District Health Officer Distt: Swat.</p>			
				<p>District Health Officer Distt: Swat.</p>			
				Service Verified from	1/7/2012	to	30/11/2012
		ANN. INC GRANTED		Service Verified from	1/12/2012	to	30/11/2013
		ANN. INC GRANTED		<p>District Health Officer Distt: Swat.</p>		<p>District Health Officer Distt: Swat.</p>	
		ANN. INC GRANTED		Service Verified from	1/12/2013	to	30/11/2014
		ANN. INC GRANTED		<p>District Health Officer Distt: Swat.</p>		<p>District Health Officer Distt: Swat.</p>	

(17)

1	2	3	4	5	6	7	8	9
Name of Post	Substantive or substantive whether permanent or temporary	If effected state (i) substantive appoinment, or (2) Whether service 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	Name and Designation of the officer in whose name the appointment is made
L.H.O. BPS-5 (6985-390-12435)		Rs 7657				17 2015 FN	[Signature]	District Health Officer
L.H.O. BPS-5 (8590-500-2118)		Rs 8057				13 2015 FN	[Signature]	District Health Officer
Do -		Rs 9857				12 2016 FN	[Signature]	District Health Officer

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attending 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 attending officer	Leave		Signature of the head of the office or other attending officer	Reference to any order issued pursuant or consequent to the Government of the Government of the Govt
				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 EPS & EP'S vide Govt: of Khyber Pakhtunkhwa Finance Department Notification No.FD/SO/RR-7-20/2015 Dated: 30/09/2015 and RC/FD/SO/RR-7-20/2015 dt: 30/09/2015
	30/11/2015		Annual Increment Allowed			Services Verified From 1/10/2014 To 20/11/2015	D.H.O Swat.
District Health Officer DISTT: SWAT.			District Health Officer DISTT: SWAT.			District Health Officer District Swat.	
						Token No: _____ Dated: _____ Drawn Pay+allowances w.e.f 1-7-2016--31-3-2016	
						Gross Amount Rs. 33005/- Deduction Rs. 1716/- Net Amount Rs. 31290/-	D.A.O Swat.
District Health Officer DISTT: SWAT.			District Health Officer DISTT: SWAT.				
	30/11/2016		Annual Increment Allowed			Services Verified From 1/10/2015 To 31/3/2016	
District Health Officer DISTT: SWAT.			District Health Officer DISTT: SWAT.			District Health Officer District Swat.	

2	3	4	5	6	7	8	9	10	11	12
1	If officiating state (i) substantive appointment, or (ii) Whether service ceased for pension under Art. 371 C.B.R.	Pay in Substantive Post	Additional pay for officiating	Other elements falling under the term "Pay"	Day of Appointment	Signature of Government servant	Nature and Designation of the officer other officiating 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
	The Accountant General, Pakhtun Kwa Poshwar	The Revised Basic Pay Scale Rs. 7665/-	5	5						
5	Rs. 7665/- 01-07-2015	590-420-21190	5							
6	Rs. 9850/- 01-07-2016	Microfilm is on 01-12-2016								
7	Accounts Officer, Pay Fixation Party									
8	District Health Officer, District Swat	Pay Revision 1/7/2017	Rs. 12260/-		2/2/17					
9	District Health Officer, District Swat	Approved Amount Allowed	Rs. 12760/-		1/12/17			30/11/2017		

017
Comptroller General
Peshawar
B.H.S. 2017

10/7/2017
10/7/2017

Name of Government Servant	9 Name and Designation of the head of the office or other attesting officer in attesting of column 1 to 8	10 Date of Termination or Appointment	11 Reason of Termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the Head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer.	15 Reference to any remuneration or gratuity or award or prize 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 on 1/7/2017
[Signature]
District Health Officer
District Swat.

Services Verified
From 1/1/2017 to 30/6/2017
[Signature]
District Health Officer
District Swat.

30-11
2017
[Signature]
District Health Officer
DISTT. SWAT

Annual Increment
Allowed
[Signature]
District Health Officer
DISTT. SWAT.

Services Verified
From 1/1/2016 to 30/11/2017
[Signature]
District Health Officer
District Swat.

**Paid arrears on a/c of
Pay & Allowances.**
w.e.f 01-07-2012 to 30-11-2015
Amounting to Rs 16,800/-

Finance Officer
LHW Program KP.
Peshwar

1 Name of Post	2 Substantive whether substantive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 CSR	4 Pay in Substantive Post	5 Additional pay for officiating	6 Other emolument falling under the term "Pay"	7 Day of Appointment	8 Signature of Governmental servant	9 Date and Designation of head of the officer who attesting officer in attesting of columns 1 to 8
LHW/BPS-5 (19260-500-25260)			Rs 13260/=			1/12 d 2/8		30

OFFICE OF THE SECRETARY
 Punjab Government
 Punjab
 India

8	9	10	11	12	13		14	15
Signature of Government servant	Name and Designation of 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		
		30/11/2018		Annual Increment Allowed				
						Services Verified From 1/12/2017 to 30/6/2018		
				District Health Officer DISTR: SWAT				

Better Copy of Page No.

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 office 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.

- 5. That employees of the same department and of the same BPS, 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.

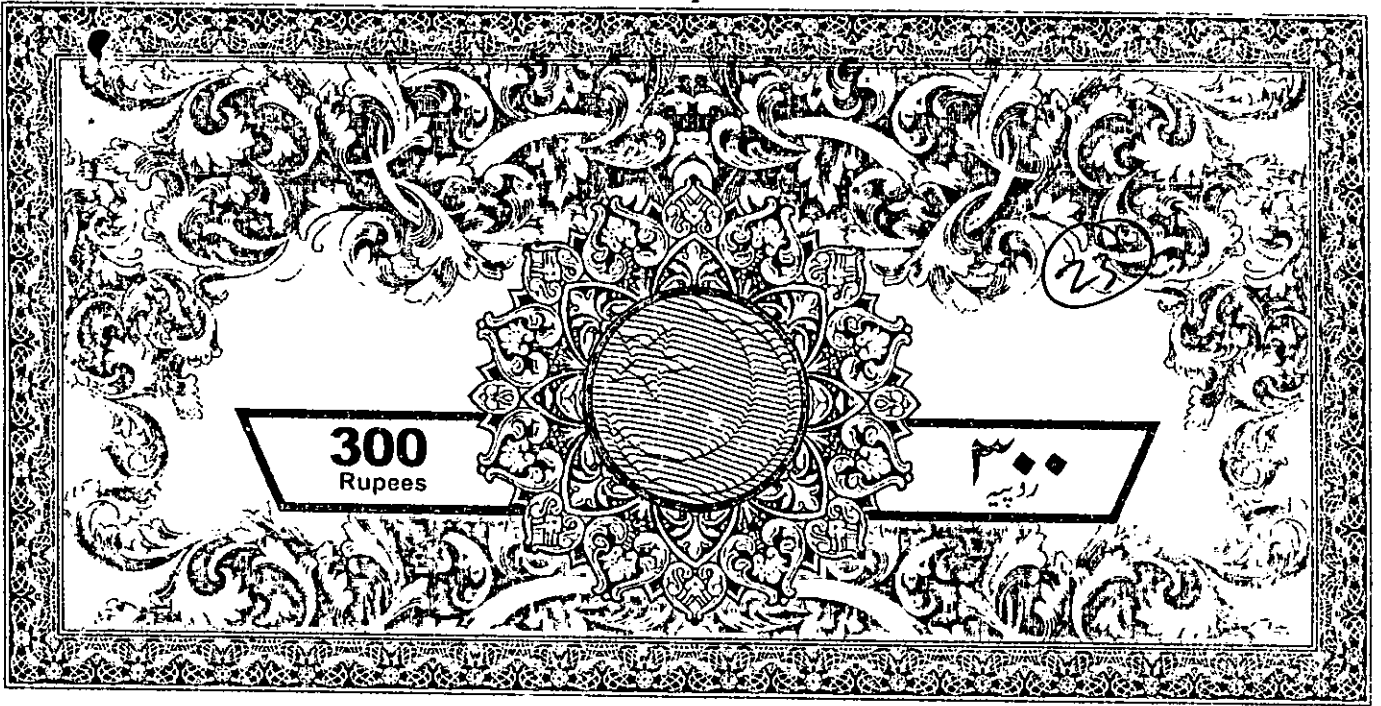
Petitioners

- 1) Mst. Maryam (2) Mst. Shehnaz (3) Mst. Saima (4) Mst. Jehan Sifat
- 5) Mst. Rawasia (6) Mst. Arabistan Bibi (7) Mst. Ashrafia Bibi (8) Mst. Abida
- 9) Mst. Neelam (10) Mst. Rabia (11) Mst. Hussan Pari (12) Mst. Bacha Zeenat
- 13) Mst. Waqif Shah (14) Mst. Farzana (15) Mst. Saima Bibi (16) Mst. Farhana
- 17) Mst. Saleem Akhtar

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

LIST OF ARREARS OF THE PETITIONERS

S.No	Name	Designation	Amount of arrears with period
01.	Mst. Maryam 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



مختار نامہ خاص

سکہ اختیار ہندگان (۱) مسماۃ سلیم اختر دختر لیاقت علی سکند غرین تحصیل خوازہ جیلہ ضلع سوات (۲) مسماۃ فرزادہ دختر امیر زادہ سکند گاڑی گھڑی شہزادی تحصیل خوازہ جیلہ ضلع سوات (۳) مسماۃ واقف شاہ دختر سر بالامیاں سکند قندیل تیرات تحصیل بحرین ضلع سوات (۴) مسماۃ اشرافیہ بی بی دختر سید رحمان سکند گاڑی لندیکس تحصیل خوازہ جیلہ ضلع سوات (۵) مسماۃ باچا زینت دختر شیرین سکند ملا باگٹ بر شور تحصیل مد ضلع سوات (۶) مسماۃ حسن پری دختر عبدالودود سکند چینہ جماعت میانم تحصیل خوازہ جیلہ ضلع سوات (۷) مسماۃ نیلم دختر اعتبار گل سکند تندو ڈاگ (حال) گنبد میرہ میگورہ تحصیل بابوزئی ضلع سوات (۸) مسماۃ عربستان بی بی دختر سلطان باچا سکند سترہ تحصیل مد ضلع سوات (۹) مسماۃ راسیہ دختر زرینوش سکند نیوکالونی تحصیل مد ضلع سوات (۱۰) مسماۃ جہان صفت دختر عبداللہ جان سکند داملٹی مدین تحصیل بحرین ضلع سوات (۱۱) مسماۃ مریم بی بی دختر باران صاحبہ سکند محلہ کوز پلو ہامہ جیلہ تحصیل مد ضلع سوات (۱۲) مسماۃ فرحانہ زوجہ محمد انور سکند شستاو تحصیل چارباغ ضلع سوات (۱۳) مسماۃ شہناز بی بی دختر خیر خان سکند محلہ برکے تحصیل خوازہ جیلہ ضلع سوات (۱۴) مسماۃ عابدہ دختر محمد سکند سرخزاندہ دیوبلی تحصیل کبل ضلع سوات (۱۵) مسماۃ صائمہ دختر بخت روان سکند محلہ پرپلو خریڈی تحصیل مد ضلع سوات (۱۶) مسماۃ رابیہ دختر فضل حسین سکند میانم تحصیل خوازہ جیلہ ضلع سوات (۱۷) مسماۃ صائمہ بی بی دختر بخت روتہ سکند ماکہ تلگرا م تحصیل چارباغ ضلع سوات کے ہیں۔ اندریں وقت بھائی ہوش و حواس خسہ برضا مندی خوشی اقرار کر کے لکھ دیتے ہیں۔ کہ میں مقرران ایک سروں اچیل سروں ٹریبونل میں دائر کرنا چاہتے ہیں، چونکہ ماقرات بوجہ مصروفیات و زمانہ ذات اچیل ہذا کی اصالت کے پیروی سے قاصر ہیں۔ بدیں وجہ ماقرات اپنی جانب سے کسی جاوید یعنی ولد فیروز شاہ سکند گنبد میرہ میگورہ تحصیل بابوزئی ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتے ہیں۔ کہ وہ ہذا تہی یا بذریعہ وکیل بیرسٹرز عدالت ابتدائی سرس ٹریبونل عدالت عظمیٰ سپریم کورٹ آف پاکستان یا دیگر عدالت ہائے مدوج کرے اور کر دئے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے۔ ایچل۔ نگرانی۔ نظر ثانی۔ رٹ پیشین دائر کرے اور کر دئے یا مقدمہ ہذا پر بائٹہ ہونے کے صورت میں ماتحت عدالت میں کارروائی کرے۔ وکالت نامہ تصدیق کرے، عرائش 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 ہر موقع کارروائی عمل میں لائیں، عذرات داخل کریں، مختاران خاص ماقران کی طرف سے راضی نامہ کریں ثالثی قبول کریں، مطلع مقرر کریں بیان منٹھی دیوے آخری روز بانی بیان دیوے/ترسی جواب دیوے/ فیصلہ ڈگری ہونے کی صورت میں کارروائی اجراء دائر کریں۔ عدالت موصوف کے علاوہ پشاور ہائی کورٹ اور عدالت عظمیٰ سپریم کورٹ آف پاکستان جو بھی ضروری اور قانونی کارروائی ہو عمل میں لائیں۔ مقدمہ ہذا بائٹہ ہونے کی صورت میں مختاران موصوف کو بھی یہی تمام اختیارات بعد از رہائٹ حاصل ہونگے جو کہ آج مختاران موصوف کو دئے گئے۔ الترض جملہ کارروائی باہت مقدمہ ہذا میں شریک قبول منظور ہوگی۔ لہذا مختار نامہ سند آخری ہے۔ الترمو: 16/11/2023



مسماۃ اشرافیہ بی بی

مسماۃ واقف شاہ

مسماۃ فرزادہ

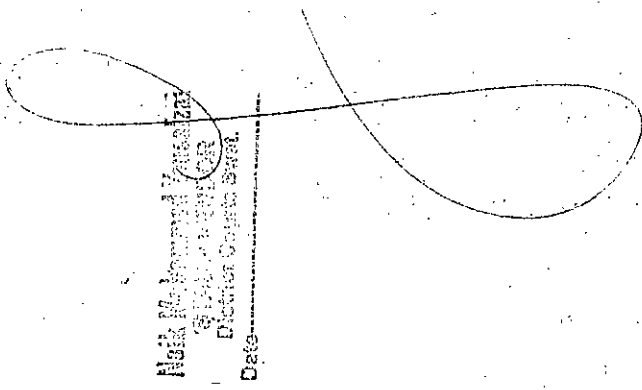
مسماۃ سلیم اختر

مسماۃ نیلم

مسماۃ حسن پری

مسماۃ باچا زینت

مسماۃ راسیہ



North Maharashtra University
 Yashwantrao Chavan
 Dattaraj College Street
 Date: _____

الع فرخانیہ الع Maryam الع Rehan Shah الع Suria
 سماء فرخانیہ سماء مریم بی بی سماء جهان صفت سماء روائیہ

الع Shir الع Saima الع S. Naz
 سماء شہناز بی بی سماء عابدہ سماء صائمہ سماء عابدہ سماء شہناز بی بی

گواہ شہیر افضل خان

شہیر افضل خان ولد عزیز الرحمن

شناختی کارڈ: 3-15602-7538465

گواہ شہیر علی خان

امیر علی خان ولد شہیر علی خان

شناختی کارڈ: 7-15602-7161460

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بار کونسل نمبر: ۵۱-۲۲-۱۱-۵۱	ڈسٹرکٹ بار ایسوسی ایشن سوات	بریل نمبر: 132028
بار ایسوسی ایشن نمبر: ۳۰۱	DBA SWAT	QR Code
رابطہ نمبر: ۰۳۴۵۹۵۱۴۵۸۵	SWAT NO. ۱	
ای میل ایڈریس: ۷۷		

بعدالت جناب: سرروس ٹریبونل عمقا پشاور

منجانب: رپیلانٹ	دعویٰ اور خواست: سرروس رپیل
مکان: فرزند عمقا پشاور	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعت حیرانگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سرروس ٹریبونل کیلئے امتیازی فی فائن ایڈوکیٹ ہائی کورٹ 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 سرسزگی 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 ہمرازہ 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 پیش مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں لعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سندر ہے

مقام سرروس ٹریبونل خیزہ بنت خواجہ پشاور کے لئے منظور ہے۔

ایڈوکیٹ دستخط:

المقوم: 22/11/23

ایڈوکیٹ مسماہ حیرانگہ

ایڈوکیٹ خیزہ بنت خواجہ پشاور