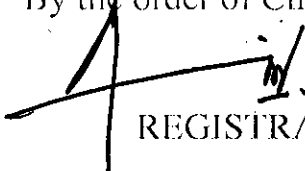


FORM OF ORDER SHEET

Court of \_\_\_\_\_

Appeal No. 2564/2023

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. Shahnaz 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. Shehnaz 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. 3694 /S.T,

DL 24-11 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Iftkhar Ali Adv.  
High Court Swat.

*all the objection are removed*

*Ollie  
Plus*

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

Service Appeal . 2564 / 2023

Mst, Shehnaz Bibi ..... Appellant  
Versus  
Govt: of KP and others. .... Respondents

INDEX

S#	Documents	Annex	Pages
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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"	10-16
7.	Copy of memo of appeal	"C"	17-19
8.	Power of Attorney		20
9.	Wakalat Nama		21

Appellant

Mst. Shehnaz Bibi S. Na

Counsel

Iftikhar Ali Khan

Iftikhar Ali Khan

Advocate High Court

Office 3<sup>rd</sup> Floor, Continental Plaza

Makanbagh, Mingora Swat.

Email:iftikharalikhanadv@gmail.com

Cell No:0345-9514585

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

---

Service Appeal No. 2564 / 2023

---

*bibi*  
Mst. Shehnaz D/o Khyber Khan R/o Mohallah Barkalay, Tehsil  
Khwazakhela, District Swat. Lady Health Worker (LHW) (BPS-05).  
Place of Posting Barkalay Tehsil  
Khwaza Khela, 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 /

3

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.

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 appellants.
- 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. Shehnaz Bibi**

*Shehnaz*

**Counsel:**

*Iftikhar Ali Khan*

**Iftikhar Ali Khan**

**Advocate High Court**



(5)  
**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal . \_\_\_\_\_ / 2023

Mst, Shehnaz 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, Shehnaz BiBi

S. M. A. J.

**Counsel:**

Iffikhar Ali Khan

**Iffikhar Ali Khan**

**Advocate High Court**

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,  
PESHAWAR

Service Appeal No. \_\_\_\_\_ / 2023

Mst. Shehnaz. Bi Bi

... 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.

TESTED

551  
22.11.2023

Deponent:

S. 219  
Shehnaz Bi Bi

Identified By Counsel:



Iffikhar Ali Khan  
Advocate High Court

7

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

Service Appeal . \_\_\_\_\_ / 2023

Mst, Shehnaz BiBi ..... Appellant  
Versus  
Govt: of KP and others. .... Respondents

**Address of Appellant:**

Mst. Shehnaz Bibi D/o Khyber Khan R/o Mohallah Barkalay,  
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 of Peshawar.

Appellant .

Mst, Shehnaz BiBi S. Naz

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

حکومت پاکستان  
وزارت برقی سٹیشن کار

15002-0299881-6

سید علی ارشد حکیم  
20/03/1981

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آوردہ کا منظرہ رولنگ

آوردہ کے بارے میں تفصیلی رپورٹیں

اس کی ایک کاپی منشی سرکار میں رکھی جائے۔

منشی سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

منشی سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

منشی سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

- 1- ایک کاپی منشی سرکار میں رکھی جائے۔
- 2- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 3- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 4- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 5- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 6- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 7- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 8- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 9- ایک کاپی ایف. او. آفس میں رکھی جائے۔
- 10- ایک کاپی ایف. او. آفس میں رکھی جائے۔

منشی سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

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منشی سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

District Health Officer

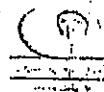
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منشی سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

منشی سرکار کے ذریعہ ایف. او. آفس میں رکھی جائے۔

Medical Office

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 1<sup>st</sup> Provision here 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. 1<sup>st</sup> 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	Nizakat	F:	Zahir Shah	LHS		CH K.Khela	Village Bar Kalay Khwazakhela
2	Nazhat	F:	M. Alam	LHS		CH K.Khela	Bar Kaly Karora Khwaza Khela.
3	Rahmonia	F:	Mangawar	LHW	10/10/1994	CH K.Khela	Ghash Kor Bar Cham.
4	Shalstu	F:	Nadar Shah	LHW	10/10/1994	CH K.Khela	Qala Khwaza Khela.
5	Shakila Bibi	F:	Sher Zada	LHW	15/09/2001	CH K.Khela	K. Kale K. Khela Distt. Swat.
6	Taliba	F:	All Akbar.	LHW	10/10/1994	CH K.Khela	Village Bandai K.Khela
7	Shenai	F:	Rohe dad Khan	LHW	01/07/2004	CH K.Khela	Langar K.khela
8	Khadi Gul	F:	Abdul Malik	LHW	02/05/1998	CH K.Khela	Tegdari Khwaza Khela.
9	Mehnaz	F:	Mohammad Zahir	LHW	14/04/2002	CH K.Khela	Distt. Swat Mohallah Tikdarai K.khela
10	Sohina Bibi	F:	Rozi Gul	LHW	15/07/2001	CH K.Khela	Village Titabat Khawaz Khela Swat
11	Shukrai	Nisar		LHW	01/08/1998	CH K.Khela	Village Jano
12	Husan Begum.		Morari	LHW	01/07/2004	CH K.Khela	Village Jano
13	Shahnaz		Khyber	LHW	01/06/1998	CH K.Khela	Barkalay Diribaba, K.khela Swat
14	Bibi Alhamia		Mulla Mohammad	LHW	15/09/2002	CH K.Khela	Bandai Khwaza Khela.
15	Rabia		Aleem Shah	LHW	15/04/2002	CH K.Khela	Titabat Khwaza Khela.
16	Sahiba		Sultan Akbar	LHW	15/04/2002	CH K.Khela	Langar Khwaza Khela Swat.
17	Aqleema		Mohammad Ali	LHW	01/04/2002	CH K.Khela	Landay Kas Khwaza Khela:
18	Shaheen Akhtar Bibi		Abdullah	LHW	15/09/2001	CH K.Khela	Vill Berari Teh. Khwaza Khela.
19	Shamim Akhtar		Ahmad Shah	LHW	01/04/2002	CH K.Khela	Tegdari Khwaza Khela.
20	Ghuzala		Zahir Shah	LHW	01/02/2003	CH K.Khela	Village Qala Khwaza Khela Barkali
21	Zalbin Nisa	F:	Sardar Khan	LHW	01/01/2003	CH K.Khela	Kozkay Khwaza Khela.
22	Islam Begum	F:	Amir Noshad	LHW	10/01/2003	CH K.Khela	Ghash Kor Koz Cham Khwaza Khela.
23	Hajree Aswad	Umar Abad		LHW	01/12/2004	CH K.Khela	Kotana
24	Farzana	Saleem	Fazal Rabi	LHW	01/12/2003	CH K.Khela	Gash Kor Khwaza Khela.
25	Nazla	F:	Zaib Sar Khan	LHW	03/12/2003	CH K.Khela	Langar K. Khela.
26	Nazia	F:	Bakht Mand	LHW	01/12/2003	CH K.Khela	Tec Darai K.Khela
27	Mumtaz	F:	Dawray	LHW	01/07/2004	CH K.Khela	K.khela Village Koz Kaley Swat
28	Yasmin	Sultanat Khan		LHW	01/12/2003	CH K.Khela	Bar kalay K.Khela
29	Himmat	Zafar Ali		LHW	15/07/2005	CH K.Khela	Koz Keley K.Khela
30	Saeeda Bi Bi	F:	Ghafor Rehman	LHW	15/07/2005	CH K.Khela	Barkeley K.Khela
31	Shabana	F:	Mohd. Zahir Khan	LHW	15/07/2005	CH K.Khela	Bandai K.Khela
32	Musarat Bi Bi	F:	M.Rahem	LHW	15/07/2005	CH K.Khela	Bandai K.Khela
33	Fatira Bi Bi	Fazal Khaliq		LHW	15/07/2005	CH K.Khela	Shambohar K.Khela
34	Sooma Bi Bi	F:	Mandin Khan	LHW	15/07/2005	CH K.Khela	Barkalay K.Khela
35	Naseem Akhtar	F:	M.Akbar	LHW	15/07/2005	CH K.Khela	Karim abad K.Khela
36	Nadia	F:	Yaqoob Khan	LHW	15/05/2006	CH K.Khela	Bar Kaley K.khela

*(Signature)*  
Medical Officer  
Category "C" Hospital  
Khwaza Khela Swat

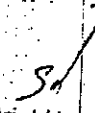
Health Department, Khyber Pakhtunkhwa  
Lady Health Workers Program  
District Programme Implementation Unit, Swat  
OFFICE OF THE DISTRICT HEALTH OFFICER SWAT

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 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.

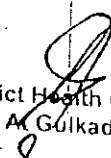
Name of Post	Basic Pay Scale
Lady Health Supervisor	7
Lady Health Worker	5
Driver	4

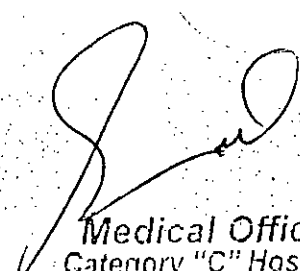
  
District Health Officer  
Swat At Gulkada

No. 11239 /LHW/RJ Dated 20/9/2014

Copies forwarded to the :

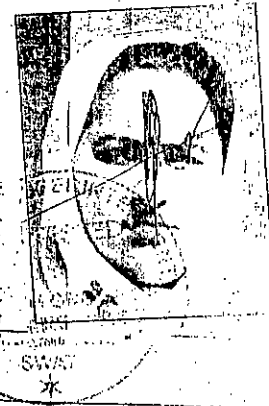
1. The Director Health Services, Health Directorate, Peshawar for kind information and further necessary action with reference to the meeting held with the Secretary Health Khyber Pakhtunkhwa on 18/9/2014 please.
2. Provincial Coordinator LHW Programme for F/P & PHC KPK Peshawar for kind information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

  
District Health Officer  
Swat At Gulkada

  
Medical Officer  
Category "C" Hospital  
Khwaza Khela Swat



Health and Age Certificate



Name of Official Shah Naz Bibi

Religious Performed Islam

Resident Village Dehrai Babi P.O. Kilkele Tehsil Kilkele District Swat

Father Name Khizer Khan Address Khawaja Khela

Date of Birth ( In words & Figure ) 20-3-1981 ( Twenty March Eight One )

Exact high by measurement 5 Feet 3 Inch

Marks of Identification Nil

Signature of Official \_\_\_\_\_

Signature of Head of Office \_\_\_\_\_

[Signature]  
District Health Officer  
District Swat

I do hereby certify that I have examined Mr./Miss Mrs. Shah Naz Bibi  
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 a LHW her according to  
her statement (33) year and by appearance is Thirty Three yrs

Left hand thumb Impression \_\_\_\_\_

First Figure \_\_\_\_\_ Second Figure \_\_\_\_\_ Third Figure \_\_\_\_\_ Small Figure \_\_\_\_\_ Thumb \_\_\_\_\_

Taken before [Signature]

Examination Medical Officer,

With Official Stamp

Dated 8/1/14

[Signature]  
Medical Superintendent  
Said Group of Hospitals  
Said Swat



8/1/14

The entries on this page should be re-newed or re-attested at least every five years and the signature to lines 10 should be dated.

Name: SHAHNAZ

Race: AFGHAN

Residence: VILLAGE DERAI BABA P/O KHAWAZA KHELMA SWAT

Father's Name and residence: KHYBER

Date of birth by Christian era as nearly as can be ascertained: 20-03-1981  
(TWENTYTH MARCH N.H & EIGHTY ONE)

Exact height by measurement: 5-3"

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:

*Shahnaaz*

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

*[Signature]*  
District Health Officer  
DIST: SWAT

(For use in Police Department only)

Heirs,

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

Note: The entries on 9 and 10 should be done

Name: \_\_\_\_\_

Race: AFC

Residence: U

Verification Roll No:

dated

received back

Father's Name

Left Thumb Impression

Date of birth by nearly as can be

Exact height by

Personal marks

Left hand thumb of (Non-Gazette)

Little Finger:

Middle Finger:

Thumb:

Signature of Gove

Signature and des Head of the officer Officer:

① Passed SSC Exam under Roll No. 654 from BISE Saidu Sharif Swat, obtained marks 336/850 English D/o Result-1999

Pushto

Qualification

Date

First Arts

B.L. Or B.A

Urdu

Pleadership examination

② Passed F.A Exam under Roll No. 82591 from BISE Saidu Sharif Swat, obtained marks 552/1100 Finger Print D/o Result-2008

Training School Final Examination

Other qualification

Drill Instructing

Court Duties

*[Signature]*  
District Health Officer  
DSTT: SWAT

Reserve Duties

N.B Line to be drawn under the qualification possessed.

9	10	11	12	13		14	15
Nature and Designation of the officer 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 debitable to another Government		
					Period		
<i>[Signature]</i>					Appointed as <u>L.H.W.</u> in the NP vide DHO Swat office Order No. <u>244-44</u> dt. <u>23/11/98</u> and accordingly submitted her arrival Report at BHUC WCD <u>K. K. K. K.</u> for duty.		
					Service Verified from <u>27/11/98</u> to <u>30/6/2011</u>	<i>[Signature]</i> District Health Officer Distt: Swat.	<i>[Signature]</i>
					On <u>22/9/2014</u> issued Notification in order for the Regularization of Staff vide DHO Swat letter No. <u>11/202/LHW</u> W.E.F. <u>17/2012</u> in view of approval granted by the P.C.H.W. Programme <u>PK</u> through letter No. <u>140/2012</u> Date <u>20/3/2014</u> .	<i>[Signature]</i> District Health Officer Distt: Swat.	<i>[Signature]</i>
<i>[Signature]</i> District Health Officer Distt: Swat.	<u>32-11-2012</u>				Service Verified from <u>1/7/2012</u> to <u>30/11/2012</u>	<i>[Signature]</i> District Health Officer Distt: Swat.	<i>[Signature]</i>
<i>[Signature]</i> District Health Officer Distt: Swat.	<u>30/11/2013</u>	<u>Annual Bonus</u>			Service Verified from <u>1/12/2012</u> to <u>30/11/2013</u>	<i>[Signature]</i> District Health Officer Distt: Swat.	<i>[Signature]</i>
<i>[Signature]</i> District Health Officer Distt: Swat.	<u>30/11/2014</u>	<u>Annual Bonus</u>			Service Verified from <u>1/12/2013</u> to <u>30/11/2014</u>	<i>[Signature]</i> District Health Officer Distt: Swat.	<i>[Signature]</i>
<i>[Signature]</i> District Health Officer Distt: Swat.						<i>[Signature]</i> District Health Officer	<i>[Signature]</i>

1	2	3	4	5	6	7	8	9	10
Name of Post	Whether Substantive and whether permanent or temporary.	Whether Substantive (i) Substantive (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in Post	Additional pay or officiating	Other employment under the term "pay"	Day of Appointment	Signature of Government servant	Signature and Designation of the head of the office or other authority in which the post is vacant	Date of appointment or termination of appointment
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014
						1/12/1988	Shahmorad	Health Officer Distt Swat	30/11/2014

9	11	12	13	14	15	
Signature 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		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 debitable to another Government	
				Period	Government to which debitable	
				Pay Revised up graded from BPS ..... & BPS ..... vide Govt: of Khybr Pakhtunkhwa Finance Department Notification No. DISO/PR 7-20/2015 Dated: 30/05/2015 and RC/FD/ISO(FR) 7-20/2015 dt: 17/08/2015		
				Services Verified From 1/12/2015 To 30/11/2015		
		Annual/Increment Allowed		Token No: 60		
				Date: 3/10/16 30/8/2016		
				Drawn Pay+allowances w.e.f 1-7-2016--31-8-2016		
				Gross Amount Rs. 33006/- 49509		
				Deduction Rs. 4716/- 2574		
				Net Amount Rs 31290/- 46935		
				D.A.O Swat.		
				Services Verified From 1/12/2015 To 30/11/2016		

Pay Revised 2016  
VNe Notification No FN1(2)  
Imp (2016-333 dated 17/7/2016

Token No: 60  
Date: 3/10/16 30/8/2016  
Drawn Pay+allowances w.e.f 1-7-2016--31-8-2016  
Gross Amount Rs. 33006/- 49509  
Deduction Rs. 4716/- 2574  
Net Amount Rs 31290/- 46935

D.A.O  
Swat.  
6/10

30/11/2015

Annual/Increment Allowed

Services Verified From 1/12/2015 To 30/11/2015

60

Date: 3/10/16 30/8/2016

Drawn Pay+allowances w.e.f 1-7-2016--31-8-2016

Gross Amount Rs. 33006/- 49509

Deduction Rs. 4716/- 2574

Net Amount Rs 31290/- 46935

D.A.O  
Swat.  
6/10

30/11/2016

Annual/Increment Allowed

Services Verified From 1/12/2015 To 30/11/2016

Date: 3/10/16 30/8/2016

Drawn Pay+allowances w.e.f 1-7-2016--31-8-2016

Gross Amount Rs. 33006/- 49509

Deduction Rs. 4716/- 2574

Net Amount Rs 31290/- 46935

D.A.O  
Swat.  
6/10

1	2	3	4	5	6	7	8	9	10	
Name of Post	Substantive or other appointment, or 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 (if any) including	Dearness Allowance	Gratuity	Signature of Government servant	Signature and Designation of the head of the office or other officiating officer in attesting of column 1 to 6	Date of termination or appointment	Remarks
L 1110 EPS-5 18935-340-1735			Rs 7665/-				1/7/2015			
do			Rs 8005/-				11/6/2015			
L 1110 EPS-5 18890-420-2120			Rs 9850/-				1/20/15			
do										
do			Rs 10275/-				12/19/16			
<p>Office of the Accountant General Khyber Pakhtunkhwa, Peshawar</p> <p>Pay Fixed in the Scale of Basic Pay Scale 6185-7665-12715</p> <p>Pay Fixed @ Rs. 7665/- w.e.f. 07-2015 R.B.P.S. 18935-340-1735</p> <p>Pay Fixed @ Rs. 8005/- w.e.f. 07-2016 Date of Next increment 12-12-2016</p>										

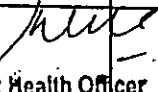
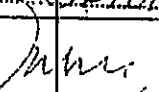
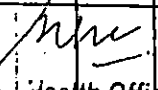
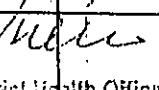

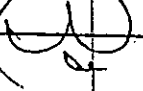
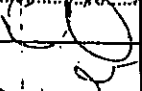
30/11/2015  
J. J. J.  
District Health Officer  
Distt. Swat

Pay Revised  
Vide Notification  
Imp (2016-333) dt

J. J. J.  
District Health Officer  
Distt. Swat

30/11/16  
J. J. J.  
District Health Officer  
Distt. Swat

J. J. J.  
District Health Officer  
Distt. Swat

9	10	11	12	13		14	15
Name and Designation of head of the office or 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 reward, 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 debitable to another Government		
	Pay Revised on 11/7/17					Services From 11/15/17 to 30/16/17	
	3 <sup>11</sup> / <sub>2</sub> 2017	Annual Increment Allowed				Services From 11/2/16 to 30/11/17	
District Health Officer District Swat.			District Health Officer District Swat.			District Health Officer District Swat.	
<p><b>Paid arrears on a/c of Pay &amp; Allowances.</b>  w.e.f 01-07-2017 to 30-11-2017  Amounting to 16286/-</p>							
<p>Finance LHW Peshawar</p>							
	30/11/2018	Annual Increment Allowed				Services Verified From 11/2/18 to 30/11/2018	
District Health Officer District Swat.			District Health Officer District Swat.			District Health Officer District Swat.	



1	2	3	4	5	6	7	8	9
Name of Post	Substantive Whether Substantive 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	Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8
LHW O.P.S.S  (10260-500-25260)		R8	12260/-			1/7 2017		
do		R8	12760/-			1/12 2017		
		Office of the Accountant General Khyber Pakhtunkhwa Peshawar Pay Fixed in The R.B.P.S 2017 R.E.P.S. 10260-500-25260 M.Rs 12260/- P.M. W.E.F 1.07.2017 With Next Increment On 1.12.2017						
		Accounts Officer Pay Fixed in Party K. Pakhtunkhwa Peshawar						
do		R8	13260/2			1/12 2018		

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 Sr,

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.

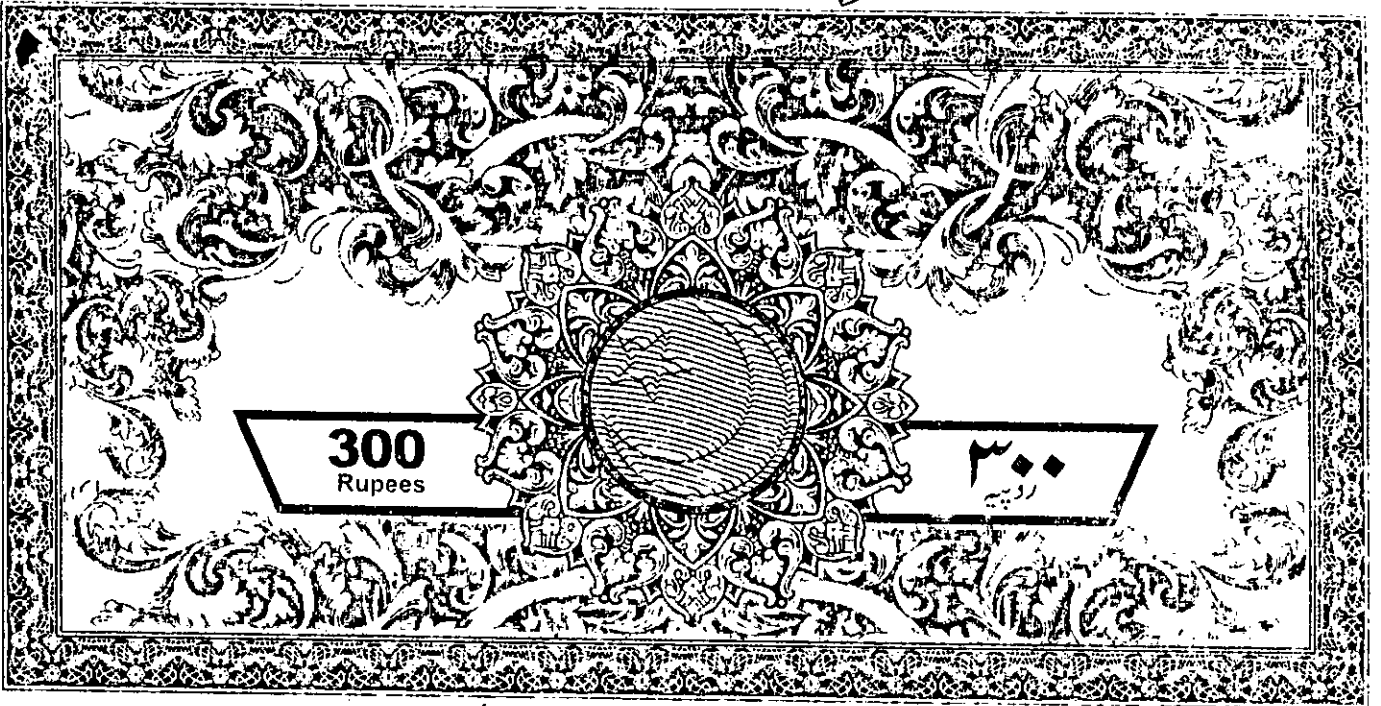
#### Petitioners

- 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.

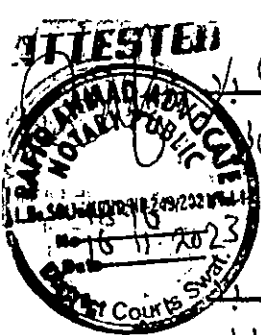
## LIST OF ARREARS OF THE PETITIONERS

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. Rowasia	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
06.	Mst. Arabstan 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 Pali	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) مسماہ سلیم اختر دختر لیاقت علی سکند فرشین تحصیل خوازہ جیلہ ضلع سوات (۲) مسماہ فرزانہ دختر امیر زادہ سکند گاڑی گھڑی شوزی تحصیل خوازہ جیلہ ضلع سوات (۳) مسماہ داؤد اہلق شاہ دختر سر بالامیاں سکند قدیل تیرات تحصیل بحرین ضلع سوات (۴) مسماہ اشرافیہ بی بی دختر سید رحمان سکند گاڑی لنڈیکس تحصیل خوازہ جیلہ ضلع سوات (۵) مسماہ بانچا زینت دختر شیرین سکند ملا بابا گٹ بر شور تحصیل مہ ضلع سوات (۶) مسماہ حسن پری دختر عبدالودد سکند چینہ جماعت میانم تحصیل خوازہ جیلہ ضلع سوات (۷) مسماہ سلیم دختر اتہار گل سکند تندو ڈاگ (حال) گنبد میرہ میکارہ تحصیل بابوزئی ضلع سوات (۸) مسماہ عربستان بی بی دختر سلطان بانچا سکند سترہ تحصیل مہ ضلع سوات (۹) مسماہ زردیہ دختر زینب نوش سکند نیوکالونی تحصیل مہ ضلع سوات (۱۰) مسماہ جہان صفت دختر عبداللہ جان سکند داسلی مدین تحصیل بحرین ضلع سوات (۱۱) مسماہ مریم بی بی دختر روان صائمہ سکند محمڈ کوز پلو ہامہ جیلہ تحصیل مہ ضلع سوات (۱۲) مسماہ فرحانہ زردیہ محمد انور سکند شلتک تحصیل چارباغ ضلع سوات (۱۳) مسماہ شہناز بی بی دختر خیر خان سکند محلہ برکے تحصیل خوازہ جیلہ ضلع سوات (۱۴) مسماہ عابدہ دختر محمد سکند سرخزاندہ دیوبلی تحصیل کبل ضلع سوات (۱۵) مسماہ صائمہ دختر بخت روان سکند محلہ برپلو خریزی تحصیل مہ ضلع سوات (۱۶) مسماہ راہبہ دختر افضل حسین سکند میانم تحصیل خوازہ جیلہ ضلع سوات (۱۷) مسماہ صائمہ بی بی دختر بخت روان سکند ماکڈ تلگرا م تحصیل چارباغ ضلع سوات کے ہیں۔ اندر میں وقت بھگی ہوش و حواس خسرہ برضامندی بخوشی اقرار کر کے لکھ دیتے ہیں۔ کہ میں مقرران ایک سروں ایچل سروں ٹریبونل میں دائر کرنا چاہتے ہیں، چونکہ ماقرات بوجہ مصروفیات و زمانہ ذات ایچل ہذا کی اصالتا کے پیردی سے قاصر ہیں۔ بدیں وجہ ماقرات اپنی جانب سے کسی جاوید علی ولد فیروز شاہ سکند گنبد میرہ میکارہ تحصیل بابوزئی ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتے ہیں۔ کہ وہ ہذا تہی یا بذریعہ وکیل میر ستر از عدالت ابتدائی سروں ٹریبونل تا عدالت عظمیٰ پیریم کورٹ آف پاکستان یا دیگر عدالت ہائے سروج کرے اور کرے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے۔ ایچل۔ نگرانی۔ نظر ثانی۔ رٹ پٹیشن دائر کرے اور کروائیں یا مقدمہ ہذا اور ہذا ہونے کے صورت میں، ماتحت عدالت میں کارروائی کرے۔ وکالت نامہ تصدیق کرے، اعتراض کی تصدیق کریں، درخواست فریق مقدمہ وغیرہ دائر کریں، درخواست اخراج مقدمہ دائر کریں۔ فہرست گواہان داخل کریں شہادت پیش کریں، اہل کیشن مقرر کریں، اہل کیشن کے ساتھ بر موقع کارروائی عمل میں لائیں، عذرات داخل کریں، عذر دائرہ خاص یا مقرران کی طرف سے راضی نامہ کریں ثالثی قبول کریں، مصلح مقرر کریں، یہاں طرف سے اپنے تہی دہانی بیان دیوے، اتر سہمی جواب دیوے، فیصلہ ڈگری ہونے کی صورت میں کارروائی اجراء دائر کریں۔ عدالت موصوف کے علاوہ پٹن در ہالی کورٹ اور عدالت سہمی پیریم کورٹ آف پاکستان جو بھی ضروری اور قانونی کارروائی ہو عمل میں لائیں۔ مقدمہ بری مانا۔ جو۔ کی صورت میں مختاران موصوف کو بھی یہی تمام اختیارات اہداز در برمانڈ حاصل ہو گئے جو کہ آج مختاران موصوف کو دئے گئے۔ الفرض جلد کارروائی بہت مقدمہ حد امن مقرر کونول و منظور ہوگی۔ لہذا مختار نامہ سند آخری ہے۔ المرقوم: 15/11/2023



مسماہ اشرافیہ بی بی

مسماہ داؤد اہلق شاہ

مسماہ فرزانہ

مسماہ سلیم اختر

مسماہ حسن پری

مسماہ صائمہ

مسماہ ستر از

مسماہ بانچا زینت

عبارتیں ہندی میں لکھی جائیں گی

16.11.2024



Milk Marketing Voucher  
State of Punjab  
District of Gurdaspur  
Date

عبارتیں ہندی میں لکھی جائیں گی

مسماة فرخاں  
مسماة مریم بی بی  
مسماة جهان صفت  
مسماة روائیہ

مسماة سائید بی بی  
مسماة راجیہ  
مسماة سائید  
مسماة عابد  
مسماة شہناز بی بی

گواہ شہناز بی بی

شیر افضل خان ولد عزیز الرحمن

شمارتی کارڈ: 3-7538465-15602

گواہ امیر علی خان

امیر علی خان ولد شیر علی خان

شمارتی کارڈ: 7-161460-15602

<p>BAR ASSOCIATION 2251 AT 130</p> <p>بار کونسل نمبر:</p> <p>بار ایسوسی ایشن نمبر:</p> <p>رابطہ نمبر: 0345-9514585</p> <p>ای میل ایڈریس: ۷۷</p>	<p>132037</p> <p>بریل نمبر</p> <p>QR CODE</p> <p>DBA SWAT</p> <p>DISTRICT BAR ASSOCIATION SWAT</p> <p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>
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بعدالت جناب: سرورس ٹریبونل پشاور

<p>منجانب: اپیلانٹ</p> <p>مسماہ شہیناز بی بی بنام</p> <p>ضلعونہ</p>	<p>دعویٰ اور خواست: سرورس (سویل)</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
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باعت حیر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سرورس ٹریبونل کیلئے استخاری علی خان ایڈووکیٹ ہائی کورٹ کو 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 اختیار ہوگا نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہزارہ 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 بعد 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 سرورس ٹریبونل خیر پختونخوا پشاور کے لئے منظور ہے۔

اپیلانٹ مسماہ شہیناز بی بی

ایڈووکیٹ دستخط:

الموعوم: 22/11/2023

اپیلانٹ بزدلہ اختیار خاص جاوید علی