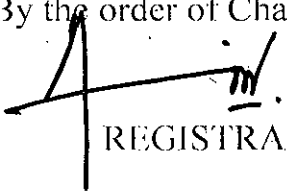


FORM OF ORDER SHEET

Court of _____

Appeal No. 2560/2023

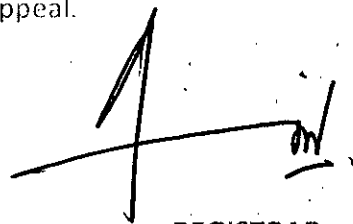
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/12/2023	<p>The appeal -of Mst. Salim Akhtar resubmitted today by Mr. Iftikhar Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____.</p> <p>By the order of Chairman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

The appeal of Mst. Saleem Akhtar 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. 3680 /S.T.

Dt. 24-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ifikhar Ali Adv.
High Court Swat.

all the objections are removed

*Ifikhar
Ali*

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . 2500 / 2023

Mst, Salim Akhtar 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"	10-16
7.	Copy of memo of appeal	"C"	17-19
8.	Power of Attorney		20
9.	Wakalat Nama		21

Appellant

Mst. Salim Akhtar [Signature]

Counsel

[Signature]

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. 2560 / 2023

File No. 9399

Dated 24-11-2023

Mst. Saleem Akhtar D/o Liaqat Ali R/o Ghar Shin, Tehsil
Khwazakhela, District Swat. Lady Health Worker (LHW) (BPS-05).

Place of Posting Ghar Shin
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.

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).

GROUNDS:

- 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. Salim Akhtar 

Counsel:



Iftikhar Ali Khan

Advocate High Court

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

Service Appeal No. _____ / 2023

Mst. Salim Akhtar.

... Appellant

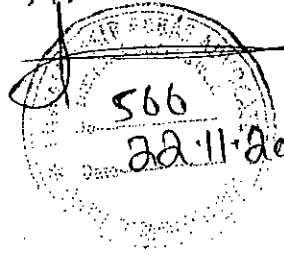
- VERSUS -

Govt: of KP and others.

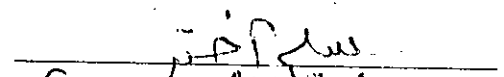
... Respondents

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

566
22.11.2023

Deponent:


Salim Akhtar

Identified By Counsel:



Ifikhar Ali Khan
Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Salim Akhtar Appellant

Versus

Govt: of KP and others. Respondents

Address of Appellant:

Mst. Salim Akhtar D/o Liaqat Ali R/o Ghar shin, 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

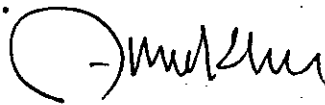
Address of Appellants:

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, Salim Akhtar _____

Counsel:



Iffikhar Ali Khan

Advocate High Court



حکومت پاکستان

15 02-3424352-0



1982
Civil Hospital Khwaza Hhela

8

00000029



HBL

Habib Bank Limited, Pakistan
MADYAN
MADYAN TEHSIL & DISTRICT SWAT

Date

or bearer

PKR

Pay

Rupees

PK18HAB8700045900258401
SALEEM AKHTAR DO DADAT ALI

Signature

Please do not write below this line

PK18HAB870004590025840158:000458000496910

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U3X926

15002-3424352-3

15/03/2026

15/03/2015



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پیشکش پر ان کے خاندانی منصوبہ بندی و بیماری سخت صورت سے

28/11/73



پیشکش برائے تقرری لیڈی ہیملٹھ ورکر

سید عظیم
محلہ سوان
ضلع سوان

پیشکش برائے تقرری لیڈی ہیملٹھ ورکر
محلہ سوان
ضلع سوان

آپ کی تقرری خاندانی منصوبہ بندی و بیماری سخت صورت سے
آپ کے لئے ایک ایسی جگہ تلاش کی جائے گی جہاں آپ کو مناسب تنخواہ ملے گی۔
آپ کی تقرری کے لئے ایک ایسی جگہ تلاش کی جائے گی جہاں آپ کو مناسب تنخواہ ملے گی۔
آپ کی تقرری کے لئے ایک ایسی جگہ تلاش کی جائے گی جہاں آپ کو مناسب تنخواہ ملے گی۔

آپ کی تقرری کے لئے ایک ایسی جگہ تلاش کی جائے گی جہاں آپ کو مناسب تنخواہ ملے گی۔
آپ کی تقرری کے لئے ایک ایسی جگہ تلاش کی جائے گی جہاں آپ کو مناسب تنخواہ ملے گی۔
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آپ کی تقرری کے لئے ایک ایسی جگہ تلاش کی جائے گی جہاں آپ کو مناسب تنخواہ ملے گی۔
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آپ کی تقرری کے لئے ایک ایسی جگہ تلاش کی جائے گی جہاں آپ کو مناسب تنخواہ ملے گی۔
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ایگزیکٹو ڈسٹرکٹ آفیسر ہیملٹھ

ضلع

پیشکش برائے تقرری لیڈی ہیملٹھ ورکر
محلہ سوان
ضلع سوان

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 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

Name of Community Embedded	Father Name	Husband Name	Des.	Date of appointment	FLCF	Name of Catchment Area
Bakhti Rana	Anwar Ali Shah		LHS	01/12/1999	BHU F.Pure	Village Binoai F.Pure Swat
Meraj Bibi	Muhammad Usman		LHW	01/04/1996	BHU F.Pure	Village Binkat. Po Fateh Pure Swat.
Khurshid Talat	F:	Mohd Habib	LHW	01/04/1996	BHU F.Pure	Village Ziarat P O Fateh Pur.
Nahida	Abdul Karim		LHW	02/06/1997	BHU F.Pure	Village Ghar Sheen Po Fateh Pure Swat
Saleem Akhtar	F: Liaqat Ali	Liaqat Ali	LHW	10/03/1998	BHU F.Pure	Village Samshin P O Fateh Pur.
Zuhra Begum	Abdul Karim		LHW	03/08/1998	BHU F.Pure	Village Zia Rat Swat. Po Fateh Pure Swat
Noon Mahumamdia	F:	Masicen	LHW	01/04/2002	BHU F.Pure	Nailoy Qaja Sheem Po Fateh Pure Swat
Nahid Akhtar	F:	Qaisar Khan	LHW	15/04/2002	BHU F.Pure	Village P O Fateh Pur.
Shamim Akhtar	F:	Nasrat Khan	LHW	15/04/2002	BHU F.Pure	Village And P O Fateh Pur.
Shahnaz	F:	Muhabat Khan	LHW	15/04/2002	BHU F.Pure	Village Beghdehrai P O Fateh Pur.
Shameia Noor	F:	Muhammad Noor	LHW	15/04/2002	BHU F.Pure	Shincham P O Fateh Pur.
Hifa Zai	F:	Khawalay Khan	LHW	15/04/2002	BHU F.Pure	Village Bargin P O Fateh Pur.
Bacha Stooray	F:	Toba Khan	LHW	01/02/2003	BHU F.Pure	Vill Benowarai Teh. Khanozai Khela.
Nozla	Ferman Ali		LHW	01/07/2004	BHU F.Pure	Tango Shen Po Fateh Pure Swat
Rohmia	Fazal Hayat		LHW	01/07/2004	BHU F.Pure	Gar Shin Jabagai Po F.pur Swat
Bacha Begum	F:	Hazir Mohammad	LHW	01/07/2004	BHU F.Pure	Asaray F.pur Po F.pure Swat
Watan Begum	Mohd.Islam		LHW	01/07/2004	BHU F.Pure	Village Peia Po F.pure Swat
Shuzin	Sayad Rahim Shah		LHW	15/07/2005	BHU F.Pure	Village Peya Po F.pure Swat
Bakht Meenu	F:	Izat Mand	LHW	15/05/2006	BHU F.Pure	Vill: Nawakalay Po F.purc Swat
Hussain Taj	F:	Raham Di Khan	LHW	01/04/2007	BHU F.Pure	Village Titabat K.khela
Nozin	F:	Mohd Khan	LHW	15/10/2010	BHU F.Pure	Newkelay
Salma	F:	Gul Mohammad	LHW	15/10/2010	BHU F.Pure	Ziarat
Shahida	Namgir	Toti Gul	LHW	15/10/2010	BHU F.Pure	Village New Kaley F.pure
Said Ali Shah			Driver		BHU F.Pure	Vill Benowarai Teh. Khanozai Khela.

District Health Officer
Swat at Gulkada

(11)

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

S/
District Health Officer
Swat At Gulkada

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

Copy 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

Health and Age Certificate

(12)



Name of Official Saleem AKhtar

Religious Performed Islam

Resident Village Sam Shin P.O. Gahar Shin Tehsil H. Khela District Swat

Father Name Lizaat Ali Khan Address Sam Shin P.O. Gahar Shin Tehsil H. Khela

Date of Birth (In words & Figure) 4/4/1982 (Four the April Ninety Eighty two)

Exact high by measurement 5 Feet 16 Inch

Marks of Identification Nil

Signature of Official Saleem AKhtar

District Health Officer
Swat

Signature of Head of Office _____

I do hereby certify that I have examined Mr./Miss Mrs. Saleem Akhtar
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 34 year and by appearance is Healthy

Left hand thumbs Impression

First Figure _____ Second Figure _____ Third Figure _____ Small Figure _____ Thumb _____

Taken before OK

Examination Medical Officer

With Official Stamp
Dated 01/1/14

Medical Superintendent
Saidu Teaching Hospital,
Saidu Group of Hospitals
Saidu Sharif Swat

6.1.14

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Bakht N
Hussan
Nazia
Salma
Hafida
Said Ali St

Note: 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 Saleem Akhtar

Race: Afghan

Residence: village, Same Sham, PLO Gher Shins, Swat

Father's Name and residence: Laiyat Ali Khan

Date of birth by christian era as nearly as can be ascertained: 4-4-1982
Four April Ninety Eighty Two

Exact height by measurement: 5'16"

Personal marks for identification:

Left hand thumb and Finger impression of (No 1-Gazetted) officer:

Little Finger:

Ring Finger:

Middle Finger:

Fore Finger:

Thumb:

Signature of Government Servant:

Saleem Akhtar G.H.

Signature and designation of the Officer or other Assistant

[Signature]
DISTRICT RECORDS OFFICER
SWAT

(For Use in Police Department Only)

No. of ...
Date ...

Heirs,


1. _____

2. _____

3. _____

Verification Roll No: _____ dated _____ received back _____

Left Thumb Impression

Qualification	Roll No	Marks	Year	Board	Qualification	Date
English MIDDLE					First Arts	
Pushto SSC	186064	395	2005	Saidy Sharif	B.L Or B.A	
Urdu F/A F/SC	82622	489	2008	Saidy Sharif	Pleadership Examination	
Plan-drawing B/A B/Sc					Training School Final Examination	
Finger Print M/A M/Sc					Other qualification	
Drill Instructing	 Binay Akhtar DISTT-SWAT.					
Court Duties						
Reserve Duties						

9	10	11	12	13		14	15	
				Leave				
				Nature and duration of leave taken	Allocation of period of leave on average payable four months for which leave salary is debit able to another Governmental			
Signature of Government servant	Signature of the head of the officer or other attesting officer in attesting of column 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	Period	Government to which debit able	Signature of the head of the office or other attesting officer	Reference to any received punishment or censure, or reward or praise of the Government Servant
					Appointed as <u>27/10</u> in the NP vide DHO Swat office Order No. <u>1478</u> dt. <u>28/6/2004</u> and accordingly submitted her arrival Report at BHUC <u>Swat</u>			
Service Verified from <u>28/6/2004</u> to <u>30/6/2012</u>					District Health Officer Distt: Swat.			
On <u>22/9/2014</u> issued Notification order for the Regularization of Staff vide DHO Swat letter No. <u>11 232/L/17/1</u> W.E.F. <u>17/2012</u> in view of approval granted by the P.C LHW Programme <u>KPK</u> through letter No <u>1340/PC</u> Dated <u>20/9/2014</u> .					District Health Officer Distt: Swat.			
Service Verified from <u>1/7/2012</u> to <u>10/11/2012</u>					District Health Officer Distt: Swat.			
Service Verified from <u>1/12/2012</u> to <u>10/11/2013</u>					District Health Officer Distt: Swat.			
Service Verified from <u>1/12/2013</u> to <u>20/11/2014</u>					District Health Officer Distt: Swat.			

AKH

AKH

AKH

AKH

AKH

District Health Officer
Distt: Swat.

District Health Officer
Distt: Swat.

District Health Officer
Distt: Swat.

District Health Officer
Distt: Swat.

20-11-2012

2013
20-11-

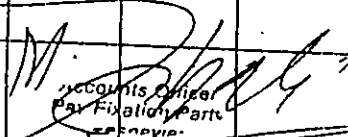
ANN. INC
GRANTED

ANN. INC
GRANTED

Service Verified from 1/12/2013 to 20/11/2014

AKH

1	2	3	4	5	6		
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"	Date of Appointment	Signature of the appointee
L.H.W Fixed			1700/- Fixed			28/1/74	Sulaiman Akhtar
L.H.W 5400-260-13200 BPS-5			5400/-			7/2/72	Sulaiman Akhtar
- DO -			5400/-			12/2/74	Sulaiman Akhtar
- DO -							
- DO -			5660/-			12/2/73	Sulaiman Akhtar
n							

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 C.S.R	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 Government servant	9 Signature and Designation of the head of the officer or other officiating officer in attesting of columns 1 to 8
L HW BPS-5 (P/1096-Son-2326)			Rs. 12260/-			17/12/17, Fri		
Office of the Accountant General Khyber Pakhtunkhwa Peshawar								
Pay Fixed in the R.B.P.S. Basic Pay Scales								
6985-340-1.0.185								
Pay Fixed @ Rs. 7665/- 01-07-2015								
R.B.P.S. 85-90-420-2.1.185								
Pay Fixed @ Rs. 9850/- 01-07-2015								
Date of Next Increment is on 01-12-2016								
 Accounts Officer Pay Fixation Party Peshawar								
- do -			Rs. 12760/-			12/12/2017		
Office of the Accountant General Khyber Pakhtunkhwa Peshawar								
Pay Fixed in The R.B.P.S. 2017								
R.B.P.S. 10960, 500-2326								
At Rs. 11160 P.M.W.F.F 1.07.2017								
With Next Increment On 1.12.2017								
Accounts Officer Pay Fixation Party II, Pakhtunkhwa Peshawar								
- do -			Rs. 13260/-			12/2018		

30
District Head of
DIST. PESHAWAR

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 Court 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. 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.

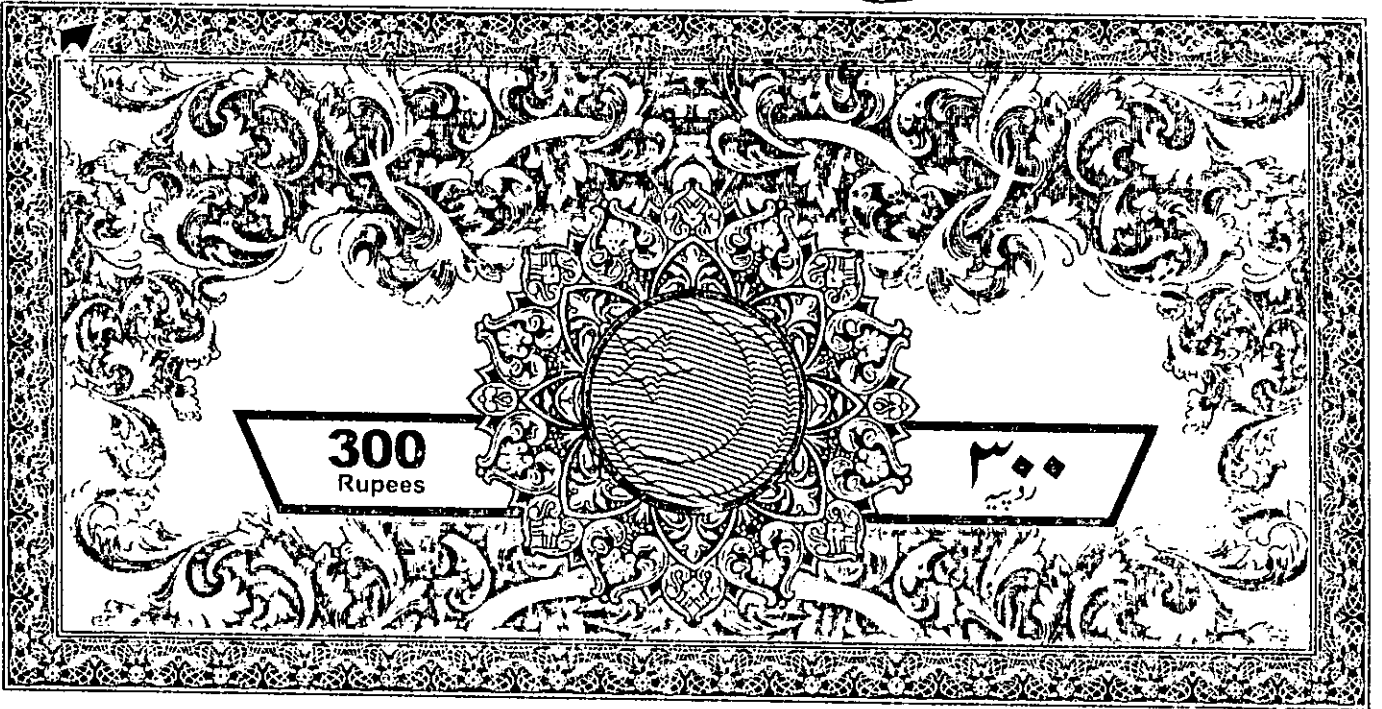
Petitioners

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

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

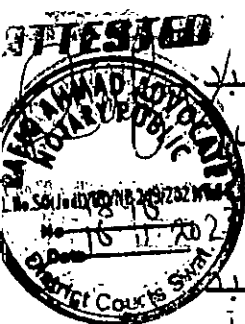
LIST OF ARREARS OF THE PETITIONERS

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 Sifal	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

سکنہ اختیار بندگان (۱) مسماۃ سلیم اختر دختر ایت علی سکنہ فرشین تحصیل خوازہ جیلہ ضلع سوات (۲) مسماۃ فرزانہ دختر امیر زادہ سکنہ گاڑی گھڑی شہودی تحصیل خوازہ جیلہ ضلع سوات (۳) مسماۃ واقف شاہ دختر سر بالامیان سکنہ قدیل تیرات تحصیل بحرین ضلع سوات (۴) مسماۃ اشرافیہ بی بی دختر سید رحمان سکنہ گاڑی لڈیکس تحصیل خوازہ جیلہ ضلع سوات (۵) مسماۃ باجازینت دختر شیرین سکنہ ملا بابا گٹ برشور تحصیل منہ ضلع سوات (۶) مسماۃ حسن پری دختر عبدالودود سکنہ چینہ جماعت میانم تحصیل خوازہ جیلہ ضلع سوات (۷) مسماۃ نیلم دختر اعتبار گل سکنہ تندو ڈاگ (حال) گنبد میرہ میکارہ تحصیل بابوزئی ضلع سوات (۸) مسماۃ عربستان بی بی دختر سلطان باچا سکنہ تڑہ تحصیل منہ ضلع سوات (۹) مسماۃ روایہ دختر زربینوش سکنہ نیوکالونی تحصیل منہ ضلع سوات (۱۰) مسماۃ جہان صفت دختر عبداللہ جان سکنہ داملی مدین تحصیل بحرین ضلع سوات (۱۱) مسماۃ مریم بی بی دختر بارون صاحب سکنہ محلہ کوز پلو باہمہ جیلہ تحصیل منہ ضلع سوات (۱۲) مسماۃ فرحانہ زوجہ محمد انور سکنہ شلتا کو تحصیل چارباغ ضلع سوات (۱۳) مسماۃ شہناز بی بی دختر خیر خان سکنہ محلہ برکل تحصیل خوازہ جیلہ ضلع سوات (۱۴) مسماۃ عابدہ دختر محمد سکنہ سرخزانہ دیوبلی تحصیل کبل ضلع سوات (۱۵) مسماۃ صائمہ دختر بخت روان سکنہ محلہ برپلو خریڈی تحصیل منہ ضلع سوات (۱۶) مسماۃ روایہ دختر فضل حسین سکنہ میانم تحصیل خوازہ جیلہ ضلع سوات (۱۷) مسماۃ صائمہ بی بی دختر بخت روان سکنہ ماکڈنگرام تحصیل چارباغ ضلع سوات کے ہیں۔ اندر میں وقت بھائی ہوش و حواس غصہ برضا مندی بخوشی اقرار کر کے لکھ دیتے ہیں۔ کہ من مقرران ایک سروں اپنی سروں ٹریبونل میں دائر کرنا چاہتے ہیں، چونکہ ما مقررات بوجہ مصروفیات و زمانہ ذات اپیل ہذا کی اصالتاً کے بیرونی سے قاصر ہیں۔ بدیں بوجہ ما مقررات اپنی جانب سے کسی جاوید علی ولد فیروز شاہ سکنہ گنبد میرہ میکارہ تحصیل بابوزئی ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتے ہیں۔ کہ وہ ہذا تہی یا بذریعہ وکیل بیرسٹرز عدالت ابتدائی سروں ٹریبونل تا عدالت عظمیٰ سپریم کورٹ آف پاکستان یا دیگر عدالت ہائے مروج کرے اور کروائے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے۔ اپیل۔ مگرانی۔ نظر ثانی۔ رٹ پٹیشن دائر کرے اور کروائیں یا مقدمہ ہذا ریماڈ ہونے کے صورت میں ماتحت عدالت میں کارروائی کرے۔ وکالت نامہ تصدیق کرے، عرائض کی تصدیق کریں، درخواست فریق مقدمہ وغیرہ دائر کریں، درخواست اخراج مقدمہ دائر کریں۔ فہرست گواہان داخل کریں شہادت پیش کریں، اپیل کیشن مقرر کریں، اپیل کیشن کے ساتھ بر موقع کارروائی عمل میں لائیں، عذرات داخل کریں، مختاران خاص، مقرران کی طرف سے راضی نامہ کریں ثالثی قبول کریں، صلح مقرر کریں بیان طمانی دیوے/تحریر و زبانی بیان دیوے/تریمی 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 ریماڈ ہونے کی صورت میں مختاران موصوف کو بھی یہی تمام اختیارات بعد از ریماڈ حاصل ہونگے جو کہ آج مختاران موصوف کو دئے گئے۔ الغرض جملہ کارروائی باہت مقدمہ ہذا من مقرر کو قبول و منظور ہوگی۔ لہذا مختار نامہ سند تحریر ہے۔ الرقوم: 16/11/2023



مسماۃ اشرافیہ بی بی

مسماۃ واقف شاہ

مسماۃ فرزانہ

مسماۃ سلیم اختر

مسماۃ باجازینت

مسماۃ نیلم

مسماۃ حسن پری

مسماۃ روایہ

صبا یزدی بولو عالی شہرستان

693

16.11.2018

Handwritten signature

Ms. M. Farooq
STATIONER
ENLIGHTENED COURT
CHAGE

الع قمر خانہ بد
سماة فرمانہ

الع Maryam بد
سماة مریم بی

الع Tehan Sifat بد
سماة جهان مفت

الع Faris بد
سماة رواہ

الع Sana بد
سماة سنا بی بی

الع Sana بد
سماة سنا بی

الع Saima بد
سماة سائما

الع Sana بد
سماة سنا بی

الع Sana بد
سماة سنا بی بی

گواہ شہر افضل خان

شیر افضل خان ولد عزیز الرحمان

شناختی کارڈ: 3-7538465-15602

گواہ شہر افضل خان

امیر علی خان ولد شیر علی خان

شناختی کارڈ: 7-7161460-15602

<p>بار کونسل نمبر: bc-11-225157</p> <p>بار ایسوسی ایشن نمبر: 1301</p> <p>رابطہ نمبر: 03459514585</p> <p>ای میل ایڈریس: ۷۷</p>	<p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p> <p>DBA SWAT</p> <p>132039</p> <p>QR Code</p>
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بعدالت جناب: سرورس ٹریبونل بنام شاہد

<p>منجانب: اپیلینٹ</p> <p>سماء سلیم</p>	<p>دعویٰ اور خواست: سرورس اپیل</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
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باعتراضاً

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سرورس ٹریبونل کیلئے افتتاحی فی خا (دو کتبہ کافی) کورٹ کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کمال 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 کی طرف، 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 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 ہر جانب 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 کی طرف ہوئے کے صورت میں وکیل صاحب ڈسٹریکٹ بار ایسوسی ایشن سوات کے لئے منظور ہے لہذا وکالت نامہ لکھ دیا کہ سندر ہے

مقام سرورس ٹریبونل فیبر پشور فزردہ شاہد کے لئے منظور ہے۔

ایڈووکیٹ اسد سید

ایڈووکیٹ اسد سید

22/11/23

المقوم:

ایڈووکیٹ بذریعہ عینیا خاص صاحبہ علی