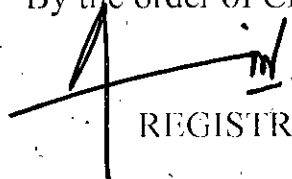


# FORM OF ORDER SHEET

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

**Appeal No.** \_\_\_\_\_

**2559/2023**

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. Jehan Sifat 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. Jehan Sifat 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. 3693 /S.T.

Dt. 24-11 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Iftkhar Ali Adv.  
High Court Swat.

*all the objection are removed*



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

Service Appeal . 2559 / 2023

Mst, Jehan Sifat ..... 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. Jehan Sifat Jehansifat

Counsel

Iftikhar Ali Khan

Iftikhar Ali Khan

Advocate High Court

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

Makanbagh, Mirtgora Swat.

Email:iftikharalikhanadv@gmail.com

Cell No:0345-9514585

①

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

---

Service Appeal No. 2559 / 2023

---

Date of Filing

9396

Dated 24-11-2023

Mst. Jehan Sifat D/o Abdullahi Jan R/o Damlai, Maday, Tehsil  
Bahrain, District Swat. Lady Health Worker (LHW): (BPS-05).  
Place of posting Damlai Madyan 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.

(4)

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

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

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

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

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

**Appellant**

Mst. Jehan Sifat Jehansifat

**Counsel:**

Iftikhar Ali Khan

**Iftikhar Ali Khan**

**Advocate High Court**

(5)

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

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

---

Mst, Jehan Sifat

..... 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, Jehan Sifat Jehansifat

**Counsel:**

Iffikhar Ali Khan

**Iffikhar Ali Khan**

**Advocate High Court**



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

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

Mst. Jehan Sifat.

... Appellant

- VERSUS -

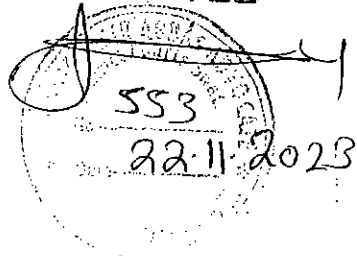
Govt: of KP and others.

... 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:

Jehan Sifat  
Jehan Sifat

**Identified By Counsel:**

**Iftikhar Ali Khan**  
Advocate High Court

7

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

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

Mst, Jehan Sifat

..... Appellant  
Versus

Govt: of KP and others.

..... Respondents

**Address of Appellant:**

Mst. Jehan Sifat D/o Abdullah Jan R/o Damlai, Maday, Tehsil Bahrain, 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, Jehan.Sifat Jehansifat

**Counsel:**



**Iftikhar Ali Khan**

**Advocate High Court**



جمہوریہ پاکستان  
 وزارت داخلہ  
 15802-6423780-2  
 نام: محمد اسحاق  
 پتہ: ...  
 تاریخ: 19/07/1982  
 دستخط: ...



(8)

بشمول ...

15602-6423780-2  
T6M5DQ



موجودہ پرنٹنگ سٹیشن، کراچی، پاکستان

مستقل پرنٹنگ ڈاٹ کام، کراچی، پاکستان

13/02/2024  
13/02/2014



Down

وزیر اعظم کا پروگرام برائے آئندہ ترقی معاشی اور بنیادی

آؤ ڈرامہ برائے انتخاب نیشنل ہیڈ وارڈنگ

نمبر شمارہ: 1/1/219. 17. مارچ. 1988. - 24 ڈی۔ ای۔ او آفس۔

شمارہ: 1/1/219. 17. مارچ. 1988. - 24 ڈی۔ ای۔ او آفس۔

عنوان: نیشنل ہیڈ وارڈنگ - کاؤن/شمارہ

موضوع: نیشنل ہیڈ وارڈنگ

بیماری حرکت صحت / دیہی حرکت صحت / تحصیل بیدوار شہستان / ضلع بیدوار شہستان

شہزادہ خیرالہ کا انتخاب

- 1- آپ کا انتخاب ابتدائی طور پر پندرہ ماہ کیلے عمل میں لایا گیا ہے۔
- 2- پہلے بارہ ہفتہ میں مختلف ٹریننگ سنٹر آپ کو ٹریننگ ہفتہ میں پانچ دن (الوار سے پورے شہن) بدھ اور جمعرات کو ہوگی
- 3- ٹریننگ کے بعد اگلے بارہ ماہ آپ کو اپنے منطقہ علاقہ میں کام کرنا ہوگا۔ چودہ تین ہفتہ کام کرنے کے بعد چوتھے ہفتہ منطقہ ٹریننگ سنٹر میں رپورٹ / ٹریننگ کیلے آنا ہوگا۔
- 4- آپ کو بارہ ہفتہ کی ٹریننگ کے دوران پچاس (50/-) روپے نوڈیہ اور اسکے بعد چودہ ماہ (1200/-) ماہوار اعزاز تیرہ دیا جائیگا۔
- 5- آپ کا انتخاب آپ کے مستقل رہائشی علاقہ کیلے ہے۔ اور دوران ٹریننگ و کام آپ کی کیسین تبدیل / ٹرانسفر نہیں ہوگی
- 6- دوران ٹریننگ و کام مختلف انعام ج. بیماری حرکت صحت / دیہی حرکت صحت / تحصیل یا ضلع بیدوار شہستان آپ کی کارکردگی کو زیر دیکھنا۔ جس کی رپورٹ وہ وقتاً فوقتاً جمع کیے گا۔
- 7- انتخاب کے بعد جب بھی پتہ چلا کہ آپ انتخاب کے اوقات میں صبح نہیں ہیں یا پروگرام کے دوران کسی وقت ہی آپ کی کارکردگی غیر تسلی بخش رہی ہو آپ کے بغیر نوڈیہ کے قانع ڈونیا جائیگا اور اس سلسلے میں آپ کو قسم کی قانونی چارہ جوئی کی حق دار نہیں ہوگی۔

- 8- اگر آپ کی کارکردگی تسلی بخش رہی ہو آپ کی انتہائی معاہدہ میں نوڈیہ ہوگی جس کی 1990 تک کے نتائج
  - 9- آپ کو پروگرام کے دوران گاہے گاہے جاری ہونے والا نام دھاریات پر عمل کرنا ہوگا
  - 10- آپ کو ہدایت کی جاتی ہے کہ آپ حورہ 2-98 کو صبح 8:30 بجے ٹریننگ نامہ C.V. دینے کے
- میں رپورٹ کریں۔ اگر آپ حورہ وقت پر حاضر ہونے سے قاصر رہیں تو آپ کا اسٹیٹس جو رپورٹ ختم نہیں جائیگا۔

نوڈیہ: اپنی طبیعت ٹریننگ شروع ہونے پر دیا جائیگا۔

کاپی جوئے اطلاع:

- 1- انعام ج. میڈیکل آفسر
- 2- مختلف H.W. ڈیپٹی۔ ایف۔ پی۔ صوبہ سندھ کراچی
- 3- پرائیویٹ سٹور ڈیپٹی۔ ایف۔ پی۔ صوبہ سندھ کراچی

1988

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 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. 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

No	Name of Community Embedded	Falher Name	Husband Name	Des:	Date of appointment	FLCF	Name of Catchment Area
	Sad Begum	F:	Shah Jehan Mian	LHS	15/10/2010	BHU Tirath	Shingal Madyan Swat.
	Waqif Shah	F:	Sarbal Amin	LHW	30/07/1996	BHU Tirath	Village Qandail Tirath
	Jehun Sefat	F:	Abdul Jan	LHW	15/06/1998	BHU Tirath	Damli Madyan Swat
	Selinaaz	Javed		LHW	17/01/2000	BHU Tirath	Tirat Gokakal.
	Rashida	F:	Bakht Vesal	LHW	17/01/2000	BHU Tirath	Tirat Shegul.
	Asia	F:	Mian Said Wahab	LHW	17/10/2000	BHU Tirath	Madyan Shaga Anghar Abad Swat
	Batul Haram	Mohammad Rahman		LHW	15/09/2001	BHU Tirath	Vill. Peia Teh. Khawaza Khela.
	Sha Zeenat	Mian Hummat Jan		LHW	15/04/2002	BHU Tirath	Tirat Morfuudi.
	Afsar Jehan	Nazam Mudin		LHW	15/04/2002	BHU Tirath	Madyan Qundil. Swat
	Sajida	Riaz Hussain		LHW	15/04/2002	BHU Tirath	Tirat Madyan Damanana Swat.
	Nazair Begum	F:	M. Ajmal	LHW	03/02/2003	BHU Tirath	Tirat Swat.
	Fazul Rahmat	F:	Asil Zaida	LHW	15/07/2005	BHU Tirath	Village Tirath Qandil Madyan Swat
	Tasleem	F:	Babo Jan	LHW	15/10/2010	BHU Tirath	Kalagram Madyan
	Samint	F:	Abdul Wahid	LHW	15/10/2010	BHU Tirath	Damli Madyan Swat

*(Signature)*  
 District Health Officer  
 Swat At Gulkada

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

11

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 I bld, 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

11/239 LHWIR/ 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

*sd*  
District Health Officer  
Swat At Gulkada

Note: The entries on this page should be re-attested at least every five years and the signature to lines 9 and 10 should be dated.

re-attested at least every five years and the signature to lines

(12)

1.	Name:	Jeham Sefat
2.	Race:	Afghan
3.	Residence:	Village: Damlai, P.O: <sup>Madyan</sup> <del>Dama</del> <del>Ubeta</del> , Tehsil: Behrain, Distt: Swat.
4.	Father's Name and residence:	Abdullah Jan Residence of Damlai, Madyan, Swat.
5.	Date of birth by christian era as nearly as can be ascertained:	19-01-1982
6.	Exact height by measurement:	5 feet and 6 inches
7.	Personal marks for identification:	
8.	Left hand thumb and Finger impression of (Non-Gazetted) officer:	
	Little Finger:	
	Ring Finger:	
	Middle Finger:	
	Fore Finger:	
	Thumb:	
9.	Signature of Government Servant:	Jeham Sefat
10.	Signature and designation of the Head of the officer, or other Attesting Officer:	 District Health Officer Distt: Swat



**(For Use in Police Department Only)**

Heirs,

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

Verification Roll No: \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

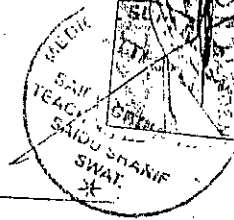
**Left Thumb Impression**

Qualification	Date	Qualification	Date
English		First Arts	
Pushto	S.S.C Roll No 2393 Session 2002 Marks 345	B.L Or B.A Saidu Sharief Swat	
Urdu		Pleadership Examination	
Plan-drawing		Training School Final Examination	
Finger Print		Other qualification	
Drill Instructing	<p align="center"><i>[Signature]</i> District Health Officer DIST: SWAT.</p>		
Court Duties			
Reserve Duties			

- 9 and
- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

Health and Age Certificate

13



Name of Official Jehan Sibhat

Religious Performed Islam

Resident Village Damkai P.O. Mardyan Tehsil Behrin District Swat

Father Name Abdulla Tan Address Damkai

Date of Birth (In words & Figure) 19-1-1982 (nineteen Jan nineteen Eighty Two)

Exact high by measurement 5 Feet 0 Inch

Marks of Identification Nil

Signature of Official Jehan Sibhat

Signature of Head of Office [Signature]  
District Health Officer

I do hereby certify that I have examined Mr./Miss Mrs. Jehan Sibhat  
Candidate for employment in the office of DHO Swat and cannot discover that he/she  
any disease constitution effect body except Nil

I do not certify this disqualification for employment as a LHW her according to  
her statement 39 year and by appearance is Healthy (32/1/14)

Left hand thumbs Impression

First Figure    Second Figure    Third Figure    Small Figure    Thumb

Taken before

Examination Medical Officer,

With Official Stamp

Dated   /  /  

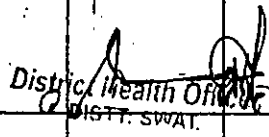
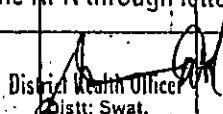
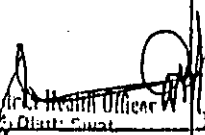
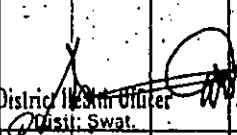
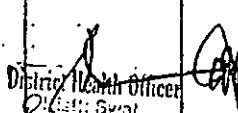
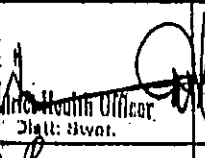
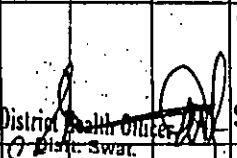

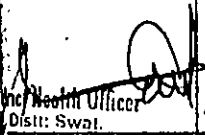


[Signature]  
Medical Officer  
Saibu Tanching Hospital  
Saibu Shant Swat

12/1/14



46

1	2	3	4		7	8	9
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 taking under the term "Pay"	Day of Appointment	Signature of Governmental servant
L.H.W							
Lady Health worker			Rs. 1200/pm (Fixed)			15-2-98	Jehan Sifat
L.H.W		Scale No 5 = 5400 - 260 - 13200 -					
do			Rs. 5400/pm			01-07-12	Jehan Sifat
do			Rs. 5400/pm			01-07-07	Jehan Sifat
							District Health Officer Sifat
do			Rs. 5669/pm			01-12-07	Jehan Sifat
							District Health Officer Sifat
do			Rs. 5920/pm			01-12-07	Jehan Sifat
							District Health Officer Sifat

9		11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer.	Reference to any received 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		
				Appointed as <u>L.H. 20</u> in the NP vide DHO Swat office Order No. <u>32-219</u> dt. <u>15-2-98</u> and accordingly submitted her arrival Report at BHU/CHCD <u>Tirath</u> for duty.			
				Service Verified from <u>15-02-98</u> to <u>01-07-01</u>			
				 District Health Officer Distt. Swat.			
				On 22/9/2014 issued Notification order for the Regularization of Staff vide DHO Swat letter No.11 232/LHW W.E.F 17/2012 in view of approval granted by the P.C LHW Programme KPK through letter No 1340/PC Dated: 20/9/2014.			
				 District Health Officer Distt. Swat.			
 District Health Officer Distt. Swat.		Annual Increment not allowed	 District Health Officer Distt. Swat.		Service Verified from <u>01-07-01</u> to <u>30-11-01</u>		
				 District Health Officer Distt. Swat.			
 District Health Officer Distt. Swat.		Annual Increment allowed	 District Health Officer Distt. Swat.		Service Verified from <u>01-12-01</u> to <u>30-11-07</u>		
				 District Health Officer Distt. Swat.			
 District Health Officer Distt. Swat.		Annual Increment allowed	 District Health Officer Distt. Swat.		Service Verified from <u>01-12-03</u> to <u>30-11-04</u>		
				 District Health Officer Distt. Swat.			

1	2	3	4	5	6	7	8
Name of Post	Substantive whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Government servant
L.N.O. BPS-3 (6985-340-12185)			Rs 7665/-			17/2015	
-Do-			Rs 8005/-			12/2015	
L.N.O. BPS-5 (8590-420-2470)			Rs 9850/-			17/2016	
7665/15							
09850/16							
			Rs 10270/-			17/2016	
			Rs 12360/2			17/17	

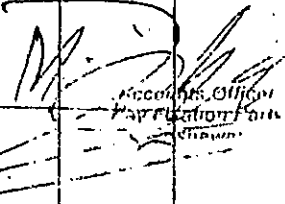
Signature and Designation of the head of the office or other officiating officer in attesting of columns I to II

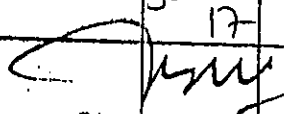
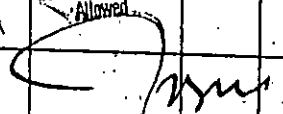
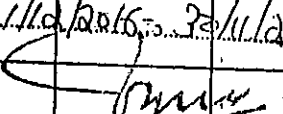
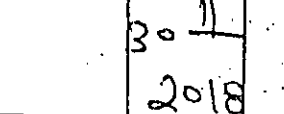
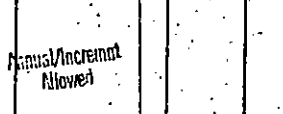
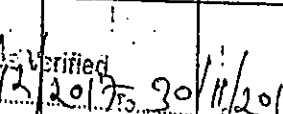
J.D.  
District Head  
DISTRICT

J.D.  
District Head  
DISTRICT

J.D.  
District Head  
DISTRICT

9 Signature and Designation of the head of the office or other attending officer in attesting of columns 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 attending officer	13 Leave		14 Signature of the head of the office or other attending officer	15 Reference to any certified pamphlet or certificate, or return or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit able to another Government		
					Period Government to which debit able		
					Pay Revised up graded from RPS vice Govt. of Khyber Pakhtunkhwa Finance Department Modification No FD/ISO/PR 7-2016/13 and RC/ISO(FR) 7-2016/13	S. & BPS	
	30/11/2015	Annual/Increment Allowed			Services Verified From 1/12/2014 To 30/11/2015		
J. Ahmad District Health Officer DISTT. SWAT.			J. Ahmad District Health Officer DISTT. SWAT.			J. Ahmad District Health Officer District Swat.	113
		Pay Revised 2016 Vide Notification No FN1(2) Imp (2016-333 dated 1-7/2016)			Token No: 5716 Dated: 30/8/2016 Drawing Pay+allowances w.e.f 1-7-2016-S1-8-2016		
J. Ahmad District Health Officer DISTT. SWAT.			J. Ahmad District Health Officer DISTT. SWAT.		Gross Amount Rs. 33006/- Deduction Rs. 3715/- Net Amount Rs. 31291/-		
	30/11/2016	Annual/Increment Allowed			Services Verified From 1/12/2015 To 30/11/2016		
J. Ahmad District Health Officer DISTT. SWAT.			J. Ahmad District Health Officer DISTT. SWAT.			J. Ahmad District Health Officer District Swat.	
		Pay Revised on 7/2017			Services Verified From 1/12/2016 To 30/11/2017		
			J. Ahmad District Health Officer District Swat.			J. Ahmad District Health Officer District Swat.	

1	2	3	4	5	6	7	8
Name of Post	Substantive whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Government servant
			Office of the Accountant General Khyber Pakhtunkhwa Peshawar Pay Fixed in the Revised Basic Pay Scale				
			<del>6985 = 240 = 1218</del>				5
			Pay Fixed @ Rs. <del>7665</del> 1.07.2016				
			R.B.P.S. <del>8592 = 420 = 2018</del>				5
			Pay Fixed @ Rs. <del>9850</del> 1.07.2016				
			Date of Next increment is on 01-12-2016				
			 Accounts Officer Pay Fixation Party Peshawar				
	Litw BPs - 5						
	(10260-500-25260)		Rs 12760/=			1 <sup>12</sup> / <sub>17</sub>	
		2017					
	Office of the Accountant General Khyber Pakhtunkhwa Peshawar Pay Fixed In The R.B.P.S: 2017						
	R.B.P.S. 10260-500-25260 (S)						
	At Rs. <sup>12260</sup> P.M.W.E.F. 1.07.2017						
	With Next Increment On 1.12.2017						
	Accounts Officer Pay Fixation Party Khyber Pakhtunkhwa Peshawar						
	do -		Rs 13260/=			1 <sup>12</sup> / <sub>2018</sub>	

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in effecting 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 a previous record of 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><b>Paid arrears on a/c of Pay &amp; Allowances.</b></p>							
<p>w.e.f 01-07-2015 to 30-11-2015</p>							
<p>Amounting to Rs. 153866/-</p>							
						<p>Finance Officer LHW Program KP, Peshawar</p>	
<p>30/11/17</p>  <p>District Health Officer DIST. SWAT.</p>		<p>Annual/Increment Allowed</p>  <p>District Health Officer DIST. SWAT.</p>		<p>Services Verified From 1/10/2016 to 30/11/2017</p>  <p>District Health Officer District Swat.</p>			
<p>30/11/2018</p>  <p>District Health Officer DIST. SWAT.</p>		<p>Annual/Increment Allowed</p>  <p>District Health Officer DIST. SWAT.</p>		<p>Services Verified From 1/12/2017 to 30/11/2018</p>  <p>District Health Officer District Swat.</p>			



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 ofit 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.

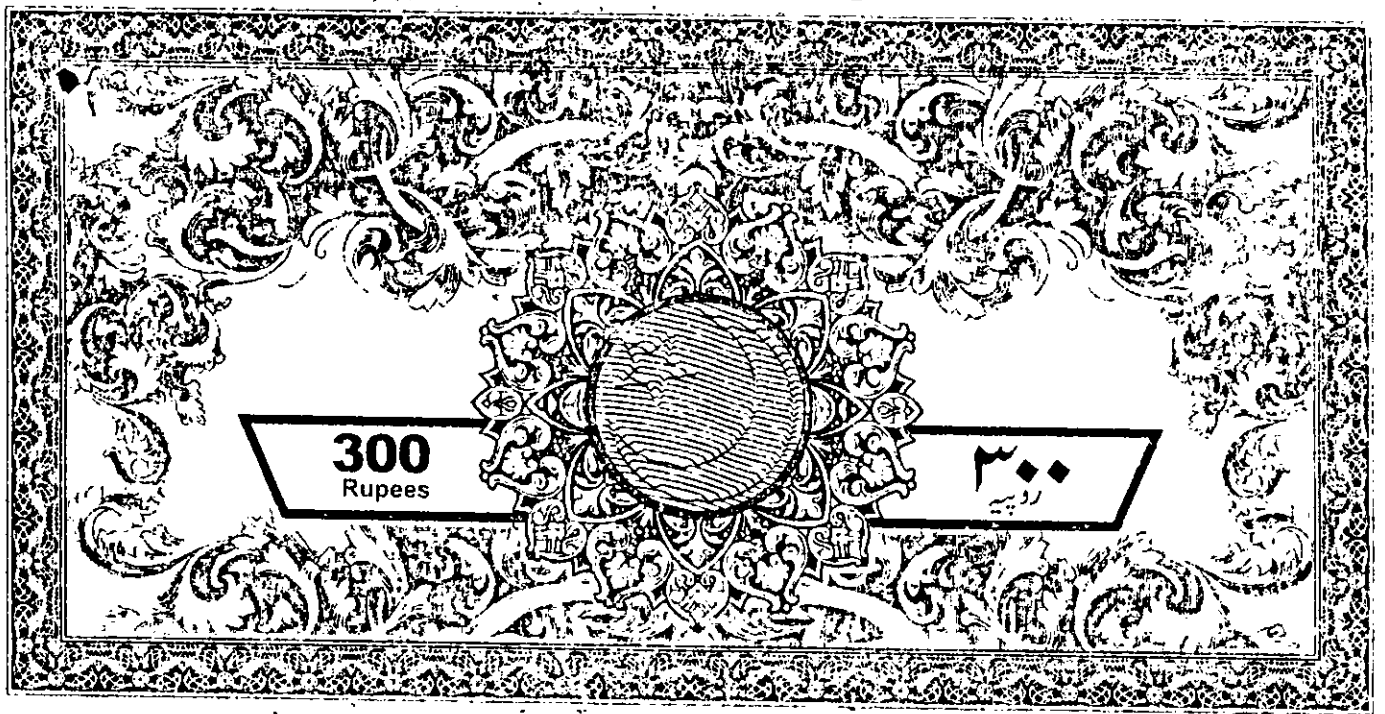
Petitioners

- 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.

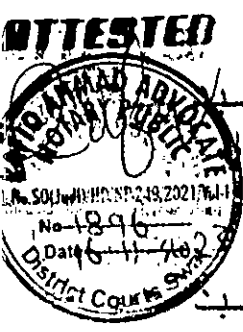
## LIST OF ARREARS OF THE PETITIONERS

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 Zeenat	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

مختار نامہ خاص (۱) مسماۃ سلیم اختر، دختر لیاقت علی سکنہ فرخین تحصیل خوازہ حیدر علی سوات (۲) مسماۃ فرزانہ دختر امیر زادہ سکنہ گاڑی گھڑی شوزئی تحصیل خوازہ حیدر علی سوات (۳) مسماۃ اقبالہ شاہ دختر سر ایامیاں سکنہ قندیل تیرات تحصیل بحرین سوات (۴) مسماۃ اشرفیہ بی بی دختر سید رحمان سکنہ کاؤنٹنڈیکس تحصیل خوازہ حیدر علی سوات (۵) مسماۃ باجارت دختر شیرین سکنہ ملا باگت بر شوہر تحصیل مدہ سوات (۶) مسماۃ حسن بی بی دختر عبدالودود سکنہ چوند جماعت میانم تحصیل خوازہ حیدر علی سوات (۷) مسماۃ نسیم دختر اعتبار گل سکنہ تندو ڈاگ (حال) گنبد میرہ پتارہ تحصیل باڈوئی سوات (۸) مسماۃ عربستان بی بی دختر سلطان باچا سکنہ حره تحصیل مدہ سوات (۹) مسماۃ رواں دختر زریز سکنہ نیو کالونی تحصیل مدہ سوات (۱۰) مسماۃ چہان صفت دختر عبداللہ جان سکنہ دامنی مدین تحصیل بحرین سوات (۱۱) مسماۃ مریم بی بی دختر اردن صاحبہ سکنہ پڑ پلو باہر حیدر علی سوات (۱۲) مسماۃ فرحانہ زوجہ محمد انور سکنہ شلتا تحصیل چارباغ سوات (۱۳) مسماۃ شہناز بی بی دختر خیر خان سکنہ حلقہ برکت تحصیل خوازہ حیدر علی سوات (۱۴) مسماۃ عابدہ دختر محمد سکنہ سرخوند دیوٹی تحصیل کبل نضیع سوات (۱۵) مسماۃ صائمہ دختر بخت روان سکنہ حلقہ بر پلو خریدی تحصیل مدہ سوات (۱۶) مسماۃ رابعہ دختر نسیب سکنہ میانم تحصیل خوازہ حیدر علی سوات (۱۷) مسماۃ صائمہ بی بی دختر بخت روان سکنہ ماکڑ تلنگرام تحصیل چارباغ سوات کے ہیں۔ اندر میں لکت بجائی ہوئی اور اس سے برضا مندی بخشی افراد کے لکھ دیتے ہیں۔ کہ میں غرض ان ایک مردوں اہل مردوں میں دائر کرنا چاہتے ہیں، چونکہ ماقرات بوجہ مصروفیات و روانہ ذات اہل ہذا کی اصلاح کے پیردی سے قاصر ہیں۔ بدیں وجہ ماقرات اپنی جانب سے سخی جاوید علی ولد فیروز شاہ سکنہ گنبد میرہ پتارہ تحصیل باڈوئی سوات کو مختار نامہ مقرر کر کے اختیار دیتے ہیں۔ کہ وہ بذاتہی یا بذریعہ وکیل پیر سزا سے عدالت ابتدائی مردوں تریبل عدالت عظمیٰ سپریم کورٹ آف پاکستان یا دیگر عدالت ہائے مردوں کرے اور کر دائے، درخواست ہائے جواب در خواست ہائے جواب الجواب یا دیگر درخواست ہائے دیوے۔ اپیل۔ گمرانی۔ نظر ثانی۔ رٹ پٹیشن دائر کرے اور کر دائیں یا مقدمہ ہذا ریٹائر ہوئے کے صورت میں ماتنت عدالت میں کارروائی کرے۔ عدالت نامہ تصدیق کیے بے اعتراض کی تصدیق کریں، درخواست فریق مقدمہ: غیرہ دائر کریں، درخواست اخراج مقدمہ دائر کریں۔ نہرست گواہان داخل کریں شہادت پیش کریں، انٹیمیشن مقرر کریں، اپیل کیشن کے ساتھ بر موخ کارروائی عمل میں لائیں، عدالت داخل کریں، مختار نامہ خاص ماقران کی طرف سے راضی نامہ کریں ثالثی قبول کریں، مصلح مقرر کریں بیان حلفی دیوے/تحریر و زبانی بیان دیوے/ترسیسی جواب دیوے/ فیصلہ ڈگری سونے کی صورت میں کارروائی اجراء دائر کریں۔ عدالت موصوف کے علاوہ پیشاوردہ ہائی کورٹ اور عدالت عظمیٰ سپریم کورٹ آف پاکستان جو بھی ضروری اور قانونی کارروائی ہو عمل میں آئیں۔ مقدمہ ریٹائر ہونے کی صورت میں، ان موصوف کو بھی تمام اختیار دیا جائے اور ان کو سونے ہوئے آج مختار نامہ موصوف کو دئے گئے۔ الغرض جملہ کارروائی بہت مقدمہ ہذا میں مقررہ قبول و منظور ہوگی۔ لہذا مختار نامہ سنداً تحریر ہے۔ المرادوم: 15/11/2023



<p>_____</p> <p>مسماۃ اشرفیہ بی بی</p>	<p>_____</p> <p>مسماۃ اقبالہ شاہ</p>	<p>_____</p> <p>مسماۃ فرزانہ</p>	<p>_____</p> <p>مسماۃ سلیم اختر</p>
<p>_____</p> <p>مسماۃ عربستان</p>	<p>_____</p> <p>مسماۃ نسیم</p>	<p>_____</p> <p>مسماۃ حسن بی بی</p>	<p>_____</p> <p>مسماۃ باجارت</p>

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16.11.2016



North West Frontier Province  
District Council  
District Council  
Date

الع قمر خان مسماة لڑکا  
 الع Maryam مسماة مریم بی بی  
 الع TEHMASHEE مسماة جهان شمت  
 الع Surrosh مسماة رواسیہ

الع [Signature] مسماة صائمہ بی بی  
 الع [Signature] مسماة رابعیہ  
 الع Sarwana مسماة صنائم  
 الع [Signature] مسماة خاندہ  
 الع SinaZ مسماة شہناز بی بی

گواہ شہر افضل خان

شیر افضل خان ولد عزیز الرحمن

شناختی کارڈ: 3-15602-7538465

گواہ شہر افضل خان

امیر علی خان ولد شیر علی خان

شناختی کارڈ: 7-15602-7161460

<p>بار کونسل نمبر: bc-111-22511</p> <p>بار ایسوسی ایشن نمبر: 130</p> <p>رابطہ نمبر: 0345-9514585</p> <p>ای میل ایڈریس: ۷۷</p>	<p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p> <p>DBA SWAT</p> <p>132036</p> <p>QR Code</p>
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بعدالت جناب: سرورس ٹریبونل بمقام پشاور

<p>منجانب: امیرانٹ</p> <p>سماہ جہان بیگم بنام</p> <p>ضلع پشاور</p>	<p>دعویٰ اور خواست سرورس ٹریبونل</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
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### باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سرورس ٹریبونل کیلئے (معنی رملی ذان الیڈوٹس ہائی پورٹ) 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 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 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 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۔

امیرانٹ (صحاہ عثمان صفی)

Jehansifat

امیرانٹ بذریعہ صحاہ عثمان صفی

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22/11/23

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