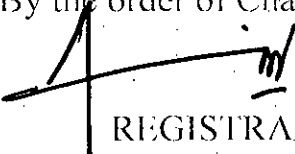


FORM OF ORDER SHEET

Court of _____

Appeal No. 2557/2023

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. Hussan Pari resubmitted today by Mr. Iflikhar 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. Hassan Pari 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. 3683 /S.T.

Dt. 24-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Iftkhar Ali Adv.
High Court Swat.

all the objections are removed

*Ollu
Hassan*

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal. 2557 / 2023

Mst, Hussan Pari Appellant
Versus

Govt: of KP and others. Respondents

INDEX

S#	Documents	Annex	Pages
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2.	Certificate		5
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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. Hussan Pari HUC

Counsel



Iftikhar Ali Khan

Advocate High Court

Office 3rd Floor, Continental Plaza

Makanbagh, Mingora Swat.

Email:iftikharalikhanadv@gmail.com

Cell No:0345-9514585

(1)

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

Service Appeal No. 2557 / 2023

9402
24-11-2023

Mst. Hussan Pari D/o Abdul Wadood R/o Cheena Masjid,
Miandam, Tehsil Khwazakhela, District Swat. Lady Health
Worker (LHW) (BPS-05). *Place of Posting Miandam,
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

(4)

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. Hussan Pari

H-LLC

Counsel:

Iftikhar Ali Khan

Iftikhar Ali Khan

Advocate High Court

3

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Hussan Pari 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, Hussan Pari H. UQ

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

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

Service Appeal No. _____ / 2023

Mst. Hussain Pari.

... Appellant

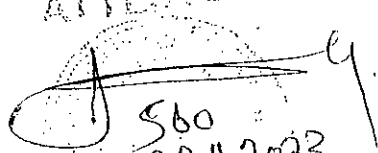
- VERSUS -

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

S60
22.11.2023

Deponent:

H. U.S.
Hussain Pari

Identified By Counsel:



Iftikhar Ali Khan
Advocate High Court

(7)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Rawasia Appellant
Versus

Govt: of KP and others. Respondents

Address of Appellant:

Mst. Hussan Pari D/o Abdul Wadood R/o Cheena Masjid,
Miandam, Tehsil Khwaza Khela, 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

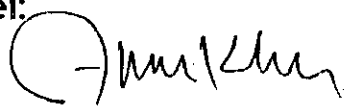
Address of Appellant:

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, Hussan Pari 17.11.23

Counsel:



Iffikhar Ali Khan

Advocate High Court



حکومت پاکستان
قومی شناختی کارڈ
15602-4082247-0



سیدہ سحر
پورٹ
ابوالفضل علی شاہ
OFFICER
Mianwali

سیدہ سحر
پورٹ

سیدہ سحر

پورٹ

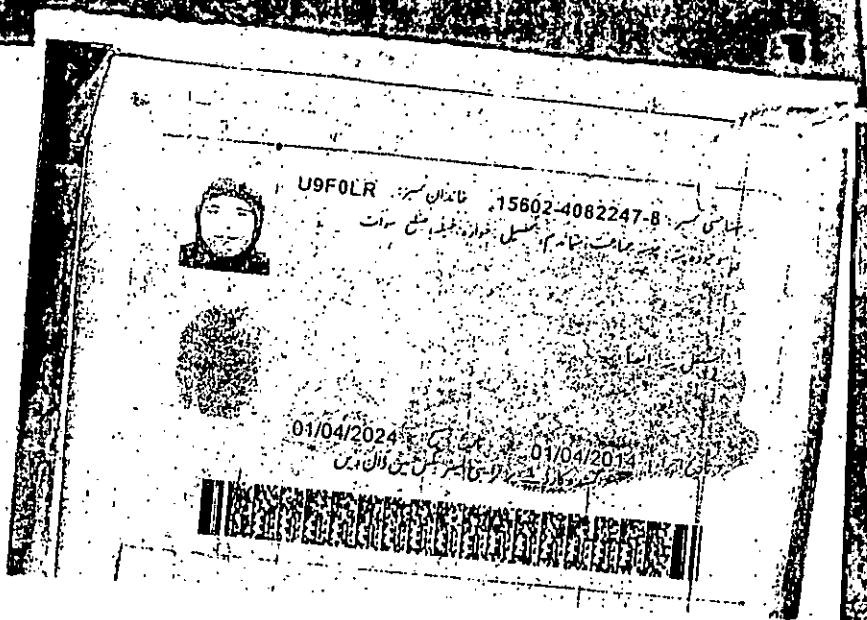
ابوالفضل علی شاہ

OFFICER

Mianwali

15602-4082247-0

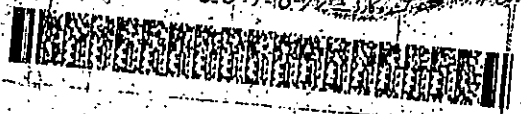
15602-4082247-0



U9F0LR 15602-4082247-B



01/04/2024 01/04/2014



9

پرنسپل پروگرام برائے خاندانی منصوبہ بندی و بیماری صحت صوبہ سرحد

ڈسٹرکٹ پروگرام ایپل مشین پروگرام

28/3/07 تاریخ 49-NP/2400



پرنسپل پروگرام برائے خاندانی منصوبہ بندی و بیماری صحت صوبہ سرحد

ڈسٹرکٹ پروگرام ایپل مشین پروگرام

مقامی سطح پر آپ کے ساتھیوں کی مدد سے...
گورنمنٹ ہسپتال...
پرنسپل پروگرام ایپل مشین پروگرام

آپ کی تقرری خانہ 1011، ماہ سے کی بنیاد پر ہوگی۔
آپ کے بعد آپ کو 15 ماہ کی نوبت دی جائیگی۔ پہلے 3 سیشن ہونے تک 5 سہولت میں ہر ٹنگ ماسل کرنا ہوگی۔ یکم اگست 12 سہولتوں کے دوران آپ کا بچہ متعارف ہونے لے گا۔ تین سہولتیں ہر ماہ ہائیس کے مطابق کام کرنا ہوگا۔ ہر ایک ہفتے کے لئے ہفتہ وار ہر ٹنگ ماسل کرنا ہوگی۔

3 ماہ کی بنیاد پر ہر ٹنگ کے دوران آپ کو 50 روپے روزانہ اور اسکے بعد 1900 روپے ماہانہ کے حساب سے ماہوار دیا جائیگا۔ تمام ماہوار میں حکومت کی ہائیس کے مطابق روز دہل گئے ہیں۔
ٹرینگ کی سہولتیں کے دوران آپ کو کم از کم ایک سال تک ہر ماہ میں پروگرام ہائیس کے مطابق کام کرنا ہوگا۔ جس کیلئے آپ کو ہر ٹنگ شروع کرنے کے وقت 50 روپے کے اسٹامپ پیپر ہر ایک سہولت پر ایک ماہ کی فراہمی کرنا ہوگی۔ اگر اس دوران آپ کو کوئی تبدیلی درپا ہو تو آپ کو اپنا وقتا مہم سے مسلمان ہائیس کرنا ہوگی۔ ہر ماہ کے لئے اس دوران ماسل کی ہوگی۔

سہولتیں اس کی مدت کی بنیاد پر آپ کو سہولتیں فراہم کی جائیں گی۔ ہر ایک سہولت کے لئے اس دوران ماسل کی ہوگی۔
تین پروگرام ہائیس کے مطابق آپ کو ہر ماہ میں ہر ٹنگ ماسل کرنا ہوگا۔
قابل التعمین کارکنوں کی سہولتیں اور آئی ٹی تقرری کی بنیاد پر ہر ایک سال تک اس شرط (اس کے لئے ہر ٹنگ کی شرط نمبر 2) کے مطابق دیا جائیگا ہے۔ جس کے لئے آپ سے کسی قسم کی کوئی سہولت نہیں لی جائے گی۔

پروگرام ہائیس کے مطابق آپ کی کارکنوں کو چاہئے کہ اسے ہر ماہ میں ہر ٹنگ ماسل کرنا ہوگی۔ ان کے لئے آپ کو ہر ماہ میں ہر ٹنگ ماسل کرنا ہوگا۔ ہر ماہ میں ہر ٹنگ ماسل کرنا ہوگا۔
آئی ٹی تقرری کی سہولتیں فراہم کی جائیں گی۔

دوران ملازمت آپ کی ہر سہولتیں فراہم کی جائیں گی۔
آئی ٹی تقرری کی سہولتیں فراہم کی جائیں گی۔
آئی ٹی تقرری کی سہولتیں فراہم کی جائیں گی۔

آئی ٹی تقرری کی سہولتیں فراہم کی جائیں گی۔
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آئی ٹی تقرری کی سہولتیں فراہم کی جائیں گی۔
آئی ٹی تقرری کی سہولتیں فراہم کی جائیں گی۔

ایگزیکٹو ڈسٹرکٹ آفیسر ہیڈ آفس
Executive District Officer
Allocation District Social

ایگزیکٹو ڈسٹرکٹ آفیسر ہیڈ آفس

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

16

NOTIFICATION

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

S.No	Name of Community Embedded	Father Name	Husband Name	Des.	Date of appointment	FLCF	Name of Catchment Area
1	Noor Hadla	Usman Ali	Baraman d	LHS	01/07/2003	BHU Miandam	Village Miandam
2	Taj Begum	Rahmat Ali	Dasta Gul	LHW	03/08/1998	BHU Miandam	Vill. Pooray Kallay Khawaza Khela.
3	Farida	Safdar	Faridoon	LHW	15/01/2001	BHU Miandam	Vill. Dambara Miandamteh, Khwaza Khela.
4	Azra	F:	Rahamdil Khan	LHW	15/09/2001	BHU Miandam	Vill Sanay Teh, Khawaza Khela.
5	Taj Begum	Mohammad Jan		LHW	15/09/2001	BHU Miandam	Vill Miandam Mohalla Geshar
6	Mehar Meena	Gulam Yusuf		LHW	15/09/2001	BHU Miandam	Vill Miandam Teh, Khwazakhela.
7	Shamim Bibi	F:	Aqal Mand.	LHW	01/02/2003	BHU Miandam	Vill Miandam Ghoreejokhpa
8	Najma Bibi	F:	Rozi Gul.	LHW	01/02/2003	BHU Miandam	Vill Khair Abad Miandamteh, KIWAZA Khela.
9	Hamida	F:	Saed Ambar mian	LHW	01/07/2004	BHU Miandam	Bram Patay Miandam
10	Khan Begum	F:	Sher ali	LHW	15/07/2005	BHU Miandam	Village Miandam
11	Zaheda	Noor Habib	Ibraheem	LHW	15/07/2005	BHU Miandam	Miandam
12	Rabla	F:	Fazal Hussain	LHW	01/04/2007	BHU Miandam	Village Miandam
13	Khal Bibi	Nasar		LHW	01/04/2007	BHU Miandam	Village Miandam
14	Hussan Pari	F:	Abdul Waheed	LHW	17/08/2007	BHU Miandam	Village Hussan Pari Swat
15	Izat Begum	F:	Asfandyar	LHW	29/08/2007	BHU Miandam	Village Miandam
16	Waelat Bibi	F:	Ayoub Khan	LHW	15/10/2010	BHU Miandam	Miandam
17	Aleha Bibi	F:	Mohd. Abdullah	LHW	15/10/2010	BHU Miandam	Miandam
18	Usman	F:	Shaffunus	Driver	01/08/2007	BHU Miandam	Miandam Swat

District Health Officer
Swat at Gulkada

14

(16)


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

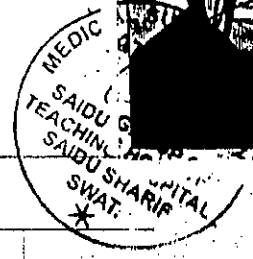

District Health Officer
Swat At Gulkada

No 11279 LHW/RI Dated 20 19/2014
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

Health and Age Certificate



Name of Official Hussan Pari

Religious Performed Islam

Resident Village Nal dera P.O. Miandam Tehsil W. Mela District Swat

Father Name Abdul waded Address village p/o miandam

Date of Birth (In words & Figure) 1-1-1990 (First January Nineteen hundred ninety)

Exact high by measurement 4 Feet 8 Inch

Marks of Identification nil

Signature of Official _____

Hussan Pari
District Health Officer

I do hereby certify that I have examined Mr./Miss Mrs. Hussan Pari 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 according to her statement (24) year and by appearance is Twenty four (24) yrs.

Left hand thumbs Impression

First Figure Second Figure Third Figure Small Figure Thumb

Taken before

Examination Medical Officer,

With Official Stamp

Dated / /

Gallo

Medical Superintendent
Saidu Teaching Hospital
Saidu Sharif Swat

12/2/14

M
District Coordinator
LHWs Program for
District Swat

12/1
12/15
8/5

(For Use in Police Department Only)

13

Helds,

1. _____
2. _____
3. _____

Verification Roll No: _____ dated _____ received back _____

Left Thumb Impression

Qualification	Date	Qualification	Date
English	passed SSC Exam under Roll No 5198 Session 2006 from BISE Swat	First Arts	
Pushto	passed FA Exam under Roll No 82549 Session 2008 from BISE Swat	B.L Or B.A	
Urdu	passed BA Exam under Roll No 2159 Session 2010 from Malakand University	Pleadership Examination	
Plan-drawing	passed BA Exam under Roll No 16179 Session 2013 from Malakand University	Training School Final Examination	
Finger Print		Other qualification	
Drill Instructing			
Court Duties			
Reserve Duties			

[Signature]
 S.WAT
 S.WAT

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

Entries on this page should be re-newed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name: Husam Pary

2. Race: Afghan Islam

3. Residence: Karona - Mandam tek; Khuzga Khela District Swat


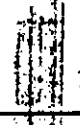
4. Father's Name and residence: Abdul Wadood


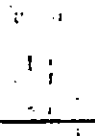
5. Date of birth by christian era as nearly as can be ascertained: 01-01-1990 I January nineteen ninety -

6. Exact height by measurement: 5 FT 01-01-1990

7. Personal marks for identification: nil

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: Hue

10. Signature and designation of the Head of the officer, or other Attesting Officer: District Health Officer
SWAT

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay, upto four months for which leave salary is debit able to another Government		
				Period	Government to which debit able		
				Appointed as <u>LHW</u> in the MP vide DHO Swat office Order No. <u>49</u> dt. <u>28-3-2007</u> and accordingly submitted her arrival Report at BHU/ICD <u>miandam</u> for duty.			
<i>District Health Officer Distt: Swat</i>				Service Verified from <u>28-03-2007</u> to <u>30-06-2012</u>			
				<i>District Health Officer Distt: Swat</i>			
				On 22/9/2014 issued Notification order for the Regularization of Staff vide DHO Swat letter No.11 232/LHW W.E.F 1/7/2012 in view of approval granted by the P.C.LHW Programme KPK through letter No 134/JPC Dated 20/9/2014.			
				<i>District Health Officer Distt: Swat</i>			
<i>District Health Officer Distt: Swat</i>				Service Verified from <u>1/7/2012</u> to <u>30/11/2012</u>			
<i>District Health Officer Distt: Swat</i> 30-11-2013		Annual Increment	Service Verified from <u>1/12/2012</u> to <u>30/11/2013</u>				
<i>District Health Officer Distt: Swat</i>				<i>District Health Officer Distt: Swat</i>			
<i>District Health Officer Distt: Swat</i> 30-11-2014		Annual Increment	Service Verified from <u>1/12/2013</u> to <u>30/11/2014</u>				
<i>District Health Officer Distt: Swat</i>				<i>District Health Officer Distt: Swat</i>			

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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
LHW Lady Hech Waa			Rs 1700/PM (Fixed)			30/3/07 Fri	Hue
LHW S/S/O-26-1320 BPS-5			Rs 5400/PM			1/1/08 Fri	Hue
do			Rs 5700/PM			1/2/09 Fri	Hue
do			Rs 5600/PM			1/2/10 Fri	Hue
do			Rs 5900/PM			1/2/2016 Fri	Hue

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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 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		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
							Revised up graded from BPS & BPS Govt of Khyber Pakhtunkhwa Finance Department Notification No.FD/SO/PR-7-20/2015 Dated: 30/06/2015 and RC/PU(SO)(FR) 7-20/2015 dt: 17/08/2015
	30/11/2015		Annual Increment Allowed				Services Verified From 1-12-2014 To 30/11/2015
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer District Swat.	
							Token No: 284 Dated: 8/7/16 Drawn Pay+allowances w.e.f 1-7-2016--31-8-2016 Gross Amount Rs. 33006/- Deduction Rs. 1716/- Net Amount Rs. 31290/-
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.				D.A.O Swat 15/5
	30/11/2016		Annual Increment Allowed				Services Verified From 1-12-2015 To 30-11-2016
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer District Swat.	
							Pay Revised on 1/2/2017 Services Verified From 1/1/2017 To 30/6/2017
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer District Swat.	

1	2	3	4	5	6	7	8
Name of Post	Substantive whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Day of Appointment	Signature of Government servant
LHW, BPS-5							
8985-340-17/85			Rs 7665/-			1/7/2015 RN	
do -			Rs 8025/-			1/12/2015 RN	
LHW BPS-5							
8590-620-2118			Rs 9050/-			7/2015	
do -			Rs 10270/-			1/12/2016	
LHW BPS-5							

LHW BPS-5

1/12/2016

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay, upto four months for which leave salary is payable to another Government		
				Period	Government to which debit able		
							Revised up graded from BPS 5 & BPS 5 Govt of Khyber Pakhtunkhwa Finance Department Notification No. FD/SO/PR-7-20/2015 Dated: 30/06/2015 and RC/FD/SO(FR) 7-20/2015 dt: 17/08/2015
	30/11/2015		Increment Allowed				Services Verified From 1-12-2014 To 30-11-2015 D.H.O Swat.
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.	
							Token No: 284 Date: 8/10 Drawn Pay + allowances w.e.f 1-7-2016-31-8-2016 Gross Amount Rs. 33006/- Deduction Rs. 1716/- Net Amount Rs. 31290/- D.A.O Swat
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.				
	30/11/2016		Annual/Increment Allowed				Services Verified From 1-12-2015 To 30-11-2016
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.	
							Pay Revised on 1/2/2017 Services Verified From 1/1/2017 To 30/6/2017
<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.			<i>J. Ahmad</i> District Health Officer Distt: Swat.	

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
<p>Office of the Accountant General Khyber Pakhtun Khwa Peshawar</p>							
<p>Pay Fixed in the Revised Basic Pay Scales C-6985-340-B-17/85 Pay Fixed @ Rs-7665/07-2015 R.B.P.S-8590-420-B-21/90</p>							
<p>Pay Fixed @ Rs-9850/07-2016 Date of Next increment at 01-12-2016</p>							
<p><i>M. [Signature]</i> Accounts Officer Gov. Peshawar</p>							
LHW B.P.S.S	<p>(10260-500-25260) Rs 12760/-</p>						
dary	<p>Rs 13260/-</p>						
<p>1-12 20/8</p>							

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

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Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit able to another Government		
					Period		
Office of the Accountant General Khyber Pakhtunkhwa Peshawar Pay Fixed in The R.B.P.S. 2017	2017						
At Rs. 12060 - 500 - 25000 With Next Incr. On	1.07.2017 1.12.2017					Finance Officer LHW Program KP. Peshawar	
Accounts Officer Pay Fixation Party K. Pakhtunkhwa Peshawar							
District Health Officer DIST: SWAT	30/11/2017	Annual Increment Allowed	District Health Officer DIST: SWAT			Services verified From 1/12/2017 to 30/11/2017	District Health Officer District Swat
District Health Officer DIST: SWAT	30/11/2018	Annual Increment Allowed	District Health Officer DIST: SWAT			Services verified From 1/12/2017 to 30/11/2018	District Health Officer District Swat

Paid 7 years on a/c of
Pay & Allowances.

w.e.f 01-07-2012 to 30-11-2015
Amounting to Rs. 163866 -

Annual Increment Allowed

Services verified
From 1/12/2017 to 30/11/2017

Annual Increment Allowed

Services verified
From 1/12/2017 to 30/11/2018

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 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 codai 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 letter 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.

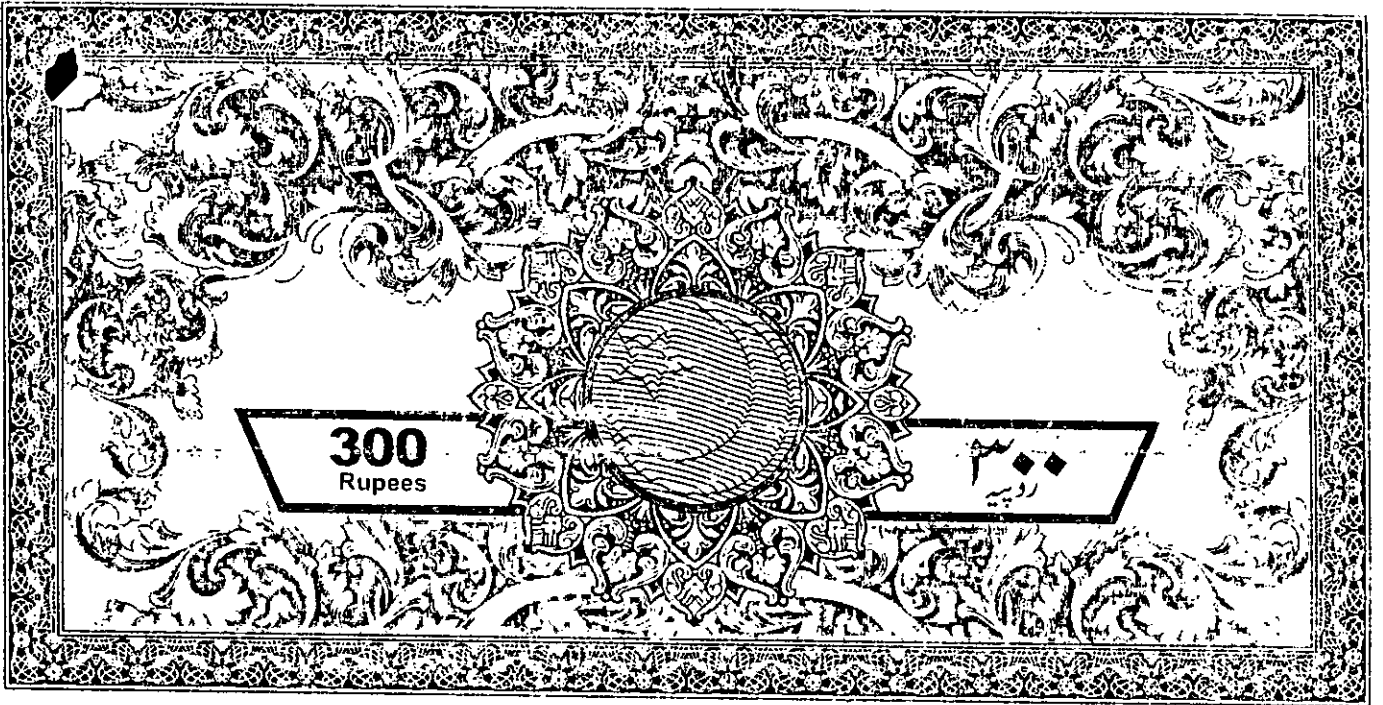
Petitioners

- 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 Zeenal
- 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

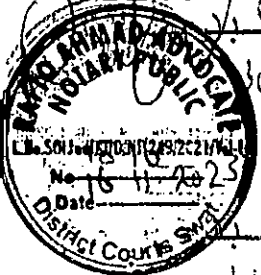
S.No	Name	Designation	Amount of arrears with period
01.	Mst. Maryam Bibi	LHW (BPS-5)	Rs. 31,290/- from 01-07-2016 to 31-08-2016
02.	Mst. Shehnaz	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
03.	Mst. Saima	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
04.	Mst. Jehan Sifat	LHW (BPS-5)	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. 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

سکہ اختیار ہندوکان (۱) مسماہ سلیم اختر دختریاقت علی سکند غرشین تحصیل خوازہ خیلہ ضلع سوات (۲) مسماہ فرزاندہ دختر امیر زادہ سکند گاڑی گھڑی شومڑی تحصیل خوازہ خیلہ ضلع سوات (۳) مسماہ واقف شاہ دختر سر بلا میاں سکند قندیل تیرات تحصیل بحرین ضلع سوات (۴) مسماہ اشرفیہ بی بی دختر میدرحان سکند گاؤں لنڈیکس تحصیل خوازہ خیلہ ضلع سوات (۵) مسماہ باجازینت دختر شیرین سکند ملا بابا گٹ برشور تحصیل مدہ ضلع سوات (۶) مسماہ حسن پری دختر عبدالودد سکند چینہ جماعت میاندم تحصیل خوازہ خیلہ ضلع سوات (۷) مسماہ سلیم دختر اعتبار گل سکند تندو ڈاگ (حال) گنبد میرہ میٹورہ تحصیل ہابوزئی ضلع سوات (۸) مسماہ عربستان بی بی دختر سلطان باچا سکند خڑہ تحصیل مدہ ضلع سوات (۹) مسماہ رواسیہ دختر زرمینوش سکند نیوکالونی تحصیل مدہ ضلع سوات (۱۰) مسماہ جہان صفت دختر عبداللہ جان سکند داملٹی بدین تحصیل بحرین ضلع سوات (۱۱) مسماہ مریم بی بی دختر بارون صاحب سکند محلہ کوز پلو باہہ خیلہ تحصیل مدہ ضلع سوات (۱۲) مسماہ فرحانہ زوجہ محمد انور سکند شلتا لو تحصیل چارباغ ضلع سوات (۱۳) مسماہ شہناز بی بی دختر خیر خان سکند محلہ برکے تحصیل خوازہ خیلہ ضلع سوات (۱۴) مسماہ عابدہ دختر محمد سکند سرخزاندہ دیوٹی تحصیل کبل ضلع سوات (۱۵) مسماہ صائمہ دختر بخت روان سکند محلہ بریلو خریٹی تحصیل مدہ ضلع سوات (۱۶) مسماہ رابیہ دختر فضل حسین سکند میاندم تحصیل خوازہ خیلہ ضلع سوات (۱۷) مسماہ صائمہ بی بی دختر بخت روان سکند ماگڈ تلگیکر نام تحصیل چارباغ ضلع سوات کے ہیں۔ اندریں وقت بھائی ہوش و جواس خسمہ برضا مندی ہوشی اقرار کر کے لکھ دیتے ہیں۔ کہ میں مقرران ایک سرسبز باغیچہ میں باغیچہ میں دائر کرنا چاہتے ہیں، چونکہ ما مقدرات بوجہ مصروفیات و زمانہ ذات اجیل ہذا کی اصالت کے پیروی سے قاصر ہیں۔ بدیں وجہ ما مقدرات اپنی جانب سے کسی جاویہ (ن) ولد فیروز شاہ سکند گنبد میرہ میٹورہ تحصیل ہابوزئی ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتے ہیں۔ کہ وہ ہذا تہی یا بذریعہ وکیل میر سٹراژ عدالت ابتدائی سرسبز باغیچہ کی عدالت عظمیٰ پیریم کورٹ آف پاکستان یا دیگر عدالت ہائے مروج کرے اور کر دے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے، ایچ۔ انگری۔ نظر ثانی۔ رٹ پٹیشن دائر کرے اور کر دے یا مقدمہ ہذا پر ناٹو ہونے کے صورت میں ماتحت عدالت میں کارروائی کرے۔ وکالت نامہ تصدیق کرے، مقرران کی تصدیق کریں، درخواست فریق مقدمہ وغیرہ دائر کریں، درخواست اخراج مقدمہ دائر کریں۔ فہرست گواہان داخل کریں شہادت پیش کریں، اہل کمیشن مقرر کریں، اہل کمیشن کے ساتھ بر موقع کارروائی عمل میں لائیں، عذرات داخل کریں، مختاران خاص ما مقرران کی طرف سے راضی نامہ کریں باثباتی قبول کریں، صلح مقرر کریں بیان طمانی دیوے/تحریر و زبانی بیان دیوے/ترسیمی جواب دیوے/فیصلہ ڈگری ہونے کی صورت میں کارروائی اجراء دائر کریں۔ عدالت موصوف کے علاوہ پشاور ہائی کورٹ اور عدالت عظمیٰ پیریم کورٹ آف پاکستان جو بھی ضروری اور قانونی کارروائی ہو عمل میں لائیں۔ مقدمہ ریٹاٹو ہونے کی صورت میں مختاران موصوف کو بھی یہی تمام اختیارات بعد از ریٹاٹو حاصل ہونگے جو کہ آج مختاران موصوف کو دئے گئے۔ الغرض جملہ کارروائی باہت مقدمہ ہذا میں مقرر کو قبول و منظور ہوگی۔ لہذا مختار نامہ سند تحریر ہے۔ المرقوم: 10/11/2023

ATTESTED



مسماہ اشرفیہ بی بی

مسماہ واقف شاہ

مسماہ فرزاندہ




مسماہ سلیم اختر

مسماہ رواسیہ


مسماہ حسن پری

مسماہ باجازینت

مسماہ عابدہ

<p>بار کونسل نمبر: 6-CC-11-2251</p> <p>بار ایسوسی ایشن نمبر: 1301</p> <p>رابطہ نمبر: 0345951458</p> <p>ای میل ایڈریس: ۷۷</p>	<p>132034</p>   
<h2>ڈسٹرکٹ بار ایسوسی ایشن سوات</h2>	

بعدالت جناب: سرورس ٹریبیونل بمقام پٹسار

<p>منجانب: ایڈوائس</p> <p>حسن پیری</p> 	<p>دعویٰ اور خواست: سرورس ٹریبیونل</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
<h3>باعت حیرانگہ</h3>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سرورس ٹریبیونل کیلئے اختیار علی صاحب ولد وین کھالی گودرا 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 سرسبزگی مقدمہ، منسوخی ڈگری کی طرفہ، 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 ہر جانبہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا جقدار 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 طرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،

لہذا وکالت نامہ لکھ دیا کہ سدر ہے

مقام سرورس ٹریبیونل خیبر پختونخوا پٹسار کے لئے منظور ہے۔

ایڈوائس صحابہ حسن پیری

ایڈوائس نذیر احمد عسکری صاحب پٹسار

(Signature)

ایڈویٹ اور دستخط:

المرقوم: 22/11/2023