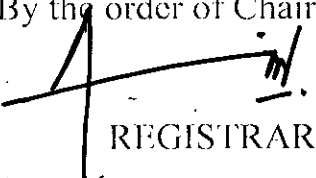


# FORM OF ORDER SHEET

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

**Appeal No.** 2555/2023

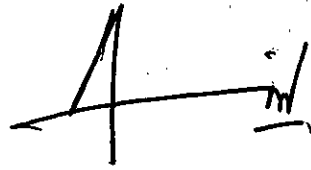
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	3
1-	11/12/2023	<p>The appeal of Mst. Rabia resubmitted today by Mr. Iftikhar Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____</p> <p>By the order of Chairman  REGISTRAR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

The appeal of Mst. Rabia 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 incôplete 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. 3690 /S.T.

Dt. 24-11 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Iftkhar Ali Adv.  
High Court Swat.

*all the objection are removed*

*Iftkhar  
Iftkhar*

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

Service Appeal . 2855 / 2023

Mst, Rabia ..... Appellant  
Versus

Govt: of KP and others. .... Respondents

INDEX

S#	Documents	Annex	Pages
1.	Memorandum of service appeal		1-4
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. Rabia 

**Counsel**

\_\_\_\_\_

Iftikhar Ali Khan

Advocate High Court

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

Makanbagh, Mingora Swat.

Email:iftikharalikhanadv@gmail.com

Cell No:0345-9514585

①

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

Service Appeal No. 2855 / 2023

FILE NO. 9408

FILE NO. 9408

Dated 24-11-2023

Mst. Rabia D/o Fazal Hussain R/o 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 Secrelury 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**).

**GROUND:**

- i. That the action, inaction and denial of respondents to pay the outstanding arrears /

allowance to the appellant, is illegal, unlawful and against the fundamental rights of appellant.

- ii. That clear discrimination has been committed with the appellant, which is in violation of the Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- iii. That appellant has the accrued right of payment of arrears / allowances already paid to same scale employees of the same department.
- iv. That the very essence of the Constitution of Pakistan, 1973, i.e. equality before law and equal protection of law, has been violated in case of the appellant.
- v. That employees of the same department and of the same BPS have been paid the allowance & arrears of the same period but appellant was neglected and discriminated, therefore, action, inaction and maltreatment is against the law.
- vi. That the same arrears (pay & allowance) were paid to other employees of the same department and of the same rank (BPS), therefore, appellant may be entitled to be treated alike and may not be discriminated in respect of that arrears / allowances.
- vii. That though the appellant has timely approached the respondents for redressal of her grievances, but till date, the appellant has neither been provided an ample opportunity of hearing nor the appellant has been given her rights i.e. arrears / allowances.

- Viii. That respondent are not authorized to deny/ refuse the payment of arrears / allowances to appellant.
- ix. Any other grounds not specifically raised will be argued with prior permission of this august court.

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

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

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

**Appellant**

**Mst. Rabia** 

**Counsel:**

\_\_\_\_\_

**Iftikhar Ali Khan**

**Advocate High Court**

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

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

Mst, Rabia

..... 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, Rabia



**Counsel:**

**Iffikhar Ali Khan**

**Advocate High Court**



5

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

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

---

Mst, Rabia

..... 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, Rabia



**Counsel:**

---

**Iffikhar Ali Khan**

**Advocate High Court**

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,  
PESHAWAR

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

Mst. Rabia.

... Appellant

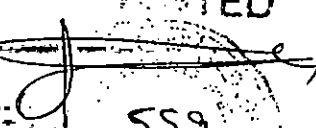
- VERSUS -

Govt: of KP and others.


... Respondents

Affidavit

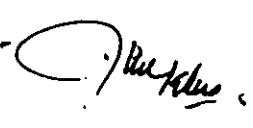
I, do hereby solemnly affirm and declares that, all the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed therein from this Hon'ble Tribunal.

TESTED  
  
559  
22.11.2023

Deponent:

  
Rabia

Identified By Counsel:



Iffikhar Ali Khan  
Advocate High Court

(7)

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

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

Mst, Rabia

..... Appellant  
Versus

Govt: of KP and others.

..... Respondents

**Address of Appellant:**

Mst. Rabia D/o Fazal Hussain R/o Miandam, 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, Rabia** \_\_\_\_\_

*Rabia*

**Counsel:**

\_\_\_\_\_  
**Iffikhar Ali Khan -**

**Advocate High Court**

9

حکومت پاکستان



15602-9963445-7

Dr. Inayat Ullah

Medical Officer

B.H.U. Mandam Swat

04/12/1982

استیوار اجیر

رشتہ دار بیمار

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شماره: 15602-9967445-2



تاریخ: 02/05/2024

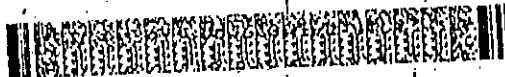
مسئول: پتو ایسا

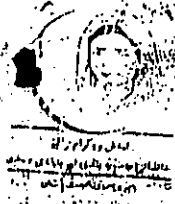


تاریخ: 02/05/2014

تاریخ: 02/05/2014

گمشدہ کارڈ ہے پر یہی نمبر کسی میں ڈال دیں





پیش کردہ تمام برائے خاندانی اور طبی مسائل اور طبی حالتوں کے لئے

1973-74

اس کی وجہ سے اس کے لئے ایک خاص کمیٹی تشکیل دی گئی ہے۔ اس کمیٹی کے رپورٹ کے مطابق اس کے لئے ایک خاص اسکیم تیار کی جائے گی۔

اس کے علاوہ اس کے لئے ایک خاص اسکیم تیار کی جائے گی۔ اس کے لئے ایک خاص کمیٹی تشکیل دی گئی ہے۔ اس کمیٹی کے رپورٹ کے مطابق اس کے لئے ایک خاص اسکیم تیار کی جائے گی۔

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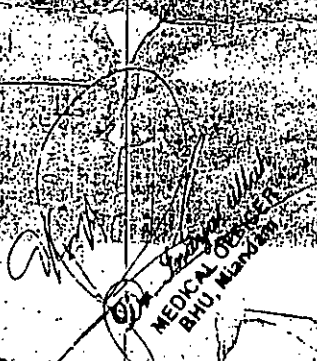
اس کے علاوہ اس کے لئے ایک خاص اسکیم تیار کی جائے گی۔ اس کے لئے ایک خاص کمیٹی تشکیل دی گئی ہے۔ اس کمیٹی کے رپورٹ کے مطابق اس کے لئے ایک خاص اسکیم تیار کی جائے گی۔

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ایگزیکٹو ڈسٹرکٹ آفیسر ہیلتھ

Executive District Officer  
Health, District Swat



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

S.No	Name of Community Embedded	Father Name	Husband Name	Des.	Date of appointment	FLCF	Name of Catchment Area
1	Noor Hadia	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. Sandy Teh. Khwaza Khela.
5	Taj Begum	Mohammad Jan		LHW	15/09/2001	BHU Miandam	Vill. Miandam Mohalla Geshar
6	Mehar Meena	Gulam Yusaf		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:	Rozil Gul	LHW	01/02/2003	BHU Miandam	Vill. Khair Abad Miandamteh. Khwaza Khela.
9	Hanida	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	Zaheeda	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 Parl	F:	Abdul Waheed	LHW	17/08/2007	BHU Miandam	Village Hussan Parl Swat
15	Izat Begum	F:	Asfandya r	LHW	29/08/2007	BHU Miandam	Village Miandam
16	Wasiat Bibi	F:	Ayoub Khan	LHW	15/10/2010	BHU Miandam	Miandam
17	Asha Bi Bi	F:	Mohd. Abdullah	LHW	15/10/2010	BHU Miandam	Miandam
18	Usman	F:	Shatfunu s	Drive	01/08/2007	BHU Miandam	Miandam Swat

District Health Officer  
 Swat at Gulkada

10

(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

*[Signature]*  
District Health Officer  
Swat At Gulkada

No. 11239 /LHWIR/ Daed 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

*[Signature]*  
District Health Officer  
Swat At Gulkada

*[Signature]*  
**Akbar Ullah**  
S.D.M BPS-16  
OHS Miandam Swat

*[Signature]*  
District Coordinator  
LHWs Program for  
District Swat



Note: The entries on this page should be re-newed or re-attested at least every five years :  
9 and 10 should be dated.

12



08

1. Name: Rabia

2. Race: Pokhtoon Islam

3. Residence: Village Miandaw near Bus stand, Tahsil  
Khawaja Khela Distt Swat

Father's Name and residence:

Fazal Hussain Village Miandaw near Bus stand Tahsil  
Kh. Khela Swat Distt

Date of birth by christian era as  
nearly as can be ascertained:

04. 12. 1992

Four ~~and~~ December Nineteen Ninety Two

Exact height by measurement:

5 Feet only

Personal marks for identification:

nil

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

Little Finger:

Ring Finger:

Middle Finger:

Fore Finger:

Thumb:

Signature of Government Servant:

Rabia

[Signature]  
District Health Officer  
SWAT

1	2	3	4	5	6	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 falling under the term "Pay"	Day of Appointment	Signature of Government servant	Signature and Designation of the head of the office or other attending officer in attesting of columns 1 to 8
LHW			Rs 1900/	(Fixed)		28/3/2007 FN (R)		19/12/2016 12/12/2016
Body Health Officer								
LHW			Rs 5400/PM			1/7/2012 FN (R)		
S/O Health Officer (BPS-5)								
do			Rs 5400/PM			1/12/2012 FN (R)		
do			Rs 5660/PM			1/12/2013 FN (R)		Health Officer Distt: Swat
do			Rs 5920/PM			1/12/2014 FN (R)		Health Officer Distt: Swat
do								
do								
do								
do								Health Officer Distt: Swat

(For Use in Police Department Only)

13

Chairs,

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

Verification Roll No:

dated

received back

Left Thumb Impression

Qualification	Roll No	Marks	Year	Date Board	University	Qualification	Date
English Middle	70775	279	2012	Swat		First Arts	
Pushto S.S.C	1201 70775	516	2004	Swat		B.L Or B.A	
Urdu FA/FAC						Pleadership Examination	
Plan-drawing B.A/BAC						Training School Final Examination	
Finger Print MU/ATSC						Other qualification	
Drill Instructing							
Court Duties							
Reserve Duties							

**Signature of Officer**  
DIBTT-SWAT.

Note: The 9 and 10

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1	2	3	4	5	6	7	8	9
Name of Post	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	Signature and Designation of the head of the officer or other officiating officer in attesting of columns 1 to 8
	Notice of the Government of Khyber Pakhtunkhwa Peshawar	Pay Fixed in the Revised Pay Scales	6985-340-12185	5				
		Pay Fixed @ Rs. 7665/01/2015	8590-425-874490	5				
		Pay Fixed @ Rs. 9850/10/07/2015	9850-10/07/2015					
		Under the increment of Rs. 12000/-	01.12.2013					
two BPS-5			As 12760/=			12/17		
260-500-25260)		Office of the Accountant General Khyber Pakhtunkhwa Peshawar	Pay Fixed in the R.S. 2017					
		R.B.P.S. 10260-20-25260						
		At Rs. 12260/- M.W.E.F. 01.07.2017						
		With Next Increment On 01.12.2017						
do		Accounts Officer Pay Fixation Party K. Pakhtunkhwa Peshawar	As 12260/=			12/2018		30/2

15

9	10	11	12	13		14	15
				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		
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	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
<i>District Health Officer Distt: Swat</i>				Appointed as <u>LHW</u> in the NP vide DHO Swat office Order No. <u>5</u> dt. <u>28/3/07</u> and accordingly submitted her arrival Report at BHU/CHCD <u>Muzdada</u> for duty.			
				Service Verified from <u>28/3/07</u> to <u>30/6/07</u>			
				<i>District Health Officer</i> 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 1/7/2012 in view of approval granted by the P.C LHW Programme KPK through letter No 1340/PC Dated 20/9/2014.			
				<i>District Health Officer</i> DISTT: SWAT.			
<i>District Health Officer</i> Distt: Swat				Service Verified from <u>1/7/09</u> to <u>30/6/12</u>			
<i>District Health Officer</i> Distt: Swat	<u>30/11/13</u>	<u>Arad</u> <u>inaction</u>		Service Verified from <u>1/12/12</u> to <u>30/11/13</u>			
			<i>District Health Officer</i> Distt: Swat	<i>District Health Officer</i> Distt: Swat.			
<i>District Health Officer</i> Distt: Swat	<u>1/12/14</u>	<u>Arad</u> <u>inaction</u>		Service Verified from <u>1/12/13</u> to <u>30/11/14</u>			

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
4110 RPS-5							
285-340-17185			Rs 7665/-			1/7/2015 RN	
-do-			Rs 8005			1/12/2015 RN	
1100 RPS-5							
530-600-24180			Rs 9850			1/2/2016	
7665/15							
9850/16							
-do-			Rs 10270/-			1/12/2016	
0 RPS-5							
50-500-25260)			Rs 12260/-			1/7/17	

Signature and Designation of the head of the office or a person acting in his stead in attesting of columns 1 to 8

J.D.  
District Health Officer  
District: ...

J.D.  
District Health Officer  
District: ...

Pa

16



Health and Age Certificate

Name of Official Rabia  
Religious Performed Islam  
Resident Village Mindam P.O. K'lehala Tehsil K'lehala District Swat  
Other Name Fozil Hussain Address ---

Date of Birth (In words & Figure) 4-12-1992  
Exact height by measurement 5 Feet 2 Inch

Marks of Identification nil

Signature of Official [Signature]

Signature of Head of Office [Signature] District Health Officer District Swat.

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

I do not certify this disqualification for employment as a LHW her according to her statement 22 year and by appearance is Healthy

Left hand thumb's Impression

First Impression Second Impression Third Impression Small Impression

Signature of Examination Medical Officer, [Signature]

With Official Stamp Dated 12/2/14

Medical Superintendent  
Sardar Group of Hospitals  
Sardar Shafi Swat  
[Signature]  
12/2/14



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 office for their redressal. It is pertinent to mention here that entry were made in the service books of the petitioners regarding the payment of arrears but till now not a single penny were paid to the petitioners.

5. That employees of the same department and of the same BPS have been paid the allowance & arrears of the same period but petitioners were neglected and discriminated, therefore, action, inaction and maltreatment is against the law.
6. That the same arrears (pay & allowance) were paid to other employees of the same department and of the same rank (BPS), therefore, petitioners may be treated alike and may not be discriminated in respect of that arrears / allowances.
7. That the petitioners time and again requested the concerned DHO, Swat, for payment of the subject arrears, which was turned down and the petitioners have not yet been paid the same, furthermore, the petitioners have been directed to approach this office.
8. That the instant request may please be considered as departmental appeal / representation.

It is therefore, humbly requested that on acceptance of the subject appeal, arrears i.e. pay & allowance of the petitioners, may kindly be handed over to them.

Any other remedy to which the petitioners are entitled, may also be awarded.

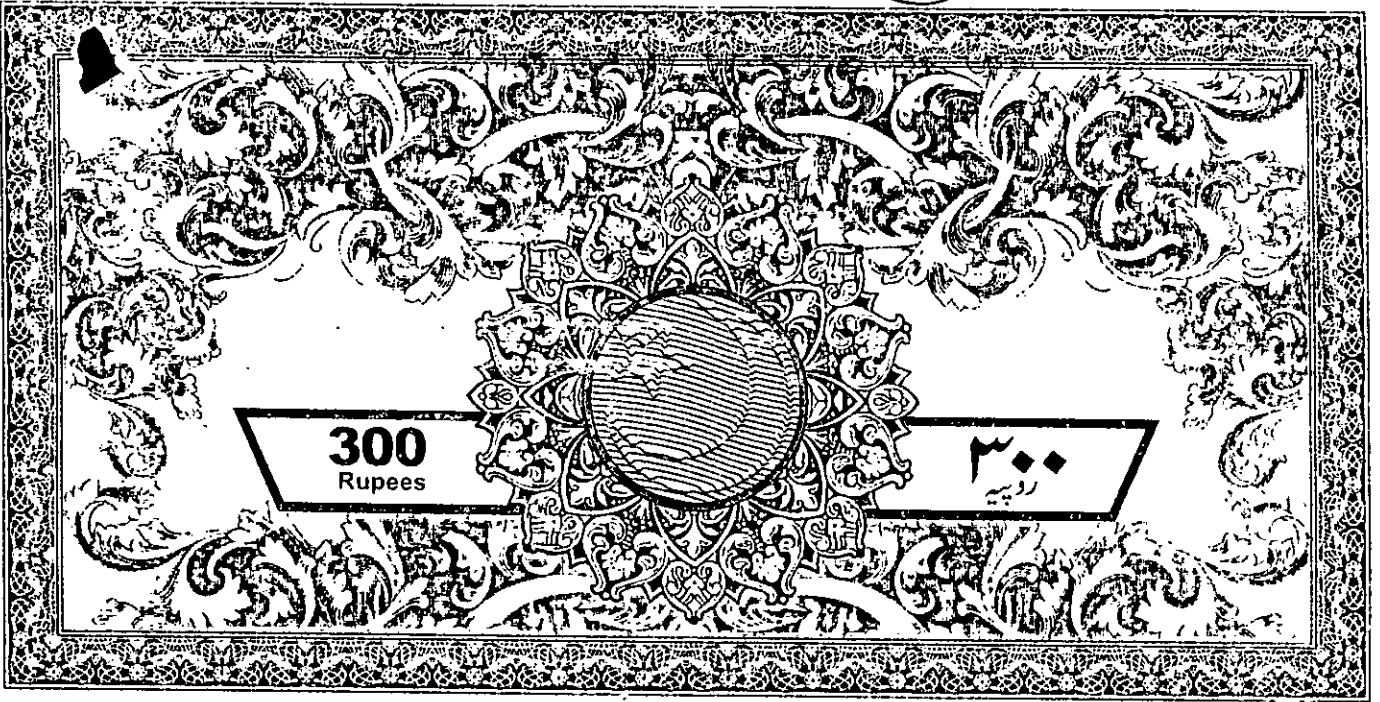
#### Petitioners

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

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

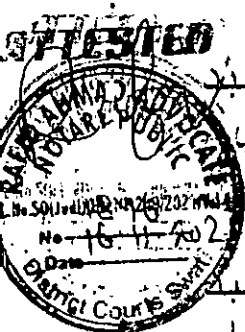
## LIST OF ARREARS OF THE PETITIONERS

S.No	Name	Designation	Amount of arrears with period
01.	Mst. Maryam Bibi	LHW (BPS-5)	Rs. 31,290/- from 01-07-2016 to 31-08-2016
02.	Mst. Shennaz	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. Pawasia	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

مکہ اختیار ہندگان (۱) مسماۃ سلیم اختر دخترا لیاقت علی سکند غرشین تحصیل خوازہ خیلہ ضلع سوات (۲) مسماۃ فرزانہ دختر امیر زادہ سکند گاڑی گھڑی شوزئی تحصیل خوازہ خیلہ ضلع سوات (۳) مسماۃ واقف شاہ دختر سر بالامیاں سکند قندیل تیرات تحصیل بحرین ضلع سوات (۴) مسماۃ اشرفیہ بی بی دختر سید رحمان سکند گاڑی لندیکس تحصیل خوازہ خیلہ ضلع سوات (۵) مسماۃ باجارت بنت دختر شیرین سکند ملا بابا گٹ بر شور تحصیل مد ضلع سوات (۶) مسماۃ حسن پری دختر عبدالودود سکند چینہ جماعت میانم تحصیل خوازہ خیلہ ضلع سوات (۷) مسماۃ نلیم دختر متباز گل سکند تندو ڈاگ (حال) گنبد میرہ جیکورہ تحصیل باہوڑی ضلع سوات (۸) مسماۃ عربستان بی بی دختر سلطان باچا سکند حڑہ تحصیل مد ضلع سوات (۹) مسماۃ رواسیہ دختر زرمینوش سکند نیوکالونی تحصیل مد ضلع سوات (۱۰) مسماۃ جہان صفت دختر عبداللہ جان سکند دالمٹی مدین تحصیل بحرین ضلع سوات (۱۱) مسماۃ سر بی بی بی دختر بارون صاحب سکند محلہ کوز پلو باہر خیلہ تحصیل مد ضلع سوات (۱۲) مسماۃ فرحانہ زوجہ محمد انور سکند شلتا لو تحصیل چارباغ ضلع سوات (۱۳) مسماۃ شہناز بی بی دختر خیر خان سکند محلہ برکے تحصیل خوازہ خیلہ ضلع سوات (۱۴) مسماۃ عابدہ دختر محمد سکند سرخزانہ دیوبند تحصیل کبل ضلع سوات (۱۵) مسماۃ صائمہ دختر بخت روان سکند محلہ بر پلو خیر بی بی تحصیل مد ضلع سوات (۱۶) مسماۃ رابعہ دختر فضل حسین سکند میانم تحصیل خوازہ خیلہ ضلع سوات (۱۷) مسماۃ صائمہ بی بی دختر بخت روان سکند محلہ کاند تئیکرام تحصیل چارباغ ضلع سوات کے ہیں۔ اندر میں وقت بھانگی ہوش و حواس خستہ برضا مندی بخوشی اقرار کر کے لکھ دیتے ہیں۔ کہ میں مقرران ایک سروس ایبل سروس ٹریبونل میں دائر کرنا چاہتے ہیں، چونکہ ماقرات ایچہ مصروفیات دروازہ ذات ایچہ ہذا کی اصالتاً کے بیرونی سے قاصر ہیں۔ بدیں وجہ ماقرات اپنی جانب سے سکی جاویدہ بی بی ولد فیروز شاہ سکند گنبد میرہ جیکورہ تحصیل باہوڑی ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتے ہیں۔ کہ وہ ہذا تہی یا بذریعہ وکیل بیرسٹرز عدالت ابتدائی سروس ٹریبونل تا عدالت عظمیٰ سپریم کورٹ آف پاکستان یا دیگر عدالت ہائے مروج کرنے اور کروانے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے۔ ایچہ۔ نگرانی۔ نظر ثانی۔ رٹ پٹیشن دائر کرے اور کروائیں یا مقدمہ ہذا پر مداخلت ہونے کے صورت میں ماتحت عدالت میں کارروائی کرے۔ رکالت، 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، اہل کیشن مقرر کریں، اہل کیشن کے ساتھ بر موقع کارروائی عمل میں لائیں، ہمدرات داخل کریں، مختاران خاص مقرران کی طرف سے راضی نامہ کریں تاشی قبول کریں، مصلح مقرر کریں بیان طلبی دیوے/تحریر ذہانی 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 سپریم کورٹ آف پاکستان جو بھی ضروری اور قانونی کارروائی ہو عمل میں لائیں۔ مقدمہ بریمانڈ ہونے کی صورت میں مختاران موصوف کو بھی یہی تمام اختیارات بعد از بریمانڈ حاصل ہونگے جو کہ آج مختاران موصوف کو دئے گئے۔ الفرض جملہ کارروائی بابت مقدمہ ہذا میں مقرر کو قبول و منظور ہوگی۔ لہذا مختار نامہ سند آخری ہے۔ المرقوم: 16/11/2023



مسماۃ اشرفیہ بی بی

مسماۃ واقف شاہ

مسماۃ فرزانہ

مسماۃ سلیم اختر

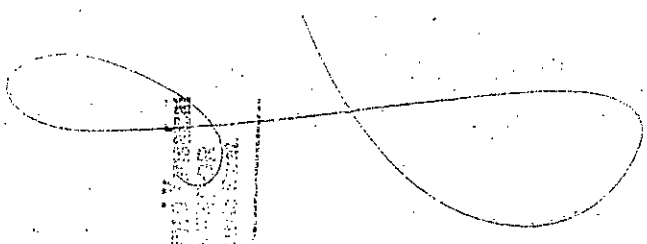
مسماۃ باجارت بنت

مسماۃ نلیم

مسماۃ حسن پری

مسماۃ رواسیہ دختر

مہربانی کے ساتھ ساتھ



Ms. Mahamud V. Javed  
Senior Auditor  
District Council Sialkot  
Date

الع قصر خانہ بد مسماة فرحانہ  
الع Maryam بد مسماة مریم بی  
الع Tehran Shah بد مسماة تہان صفت  
الع Suria بد مسماة رویہ

الع Suzan بد مسماة صنم بی بی  
الع Rahim بد مسماة راہیہ  
الع Saima بد مسماة سائمہ  
الع Abida بد مسماة عابدہ  
الع Sana بد مسماة شہناز بی بی

گواہ شہباز افضل خان

شیر افضل خان ولد عزیز الرحمن

شناختی کارڈ: 3-7538465-15602

گواہ شہباز افضل خان

امیر علی خان ولد شیر علی خان

شناختی کارڈ: 7-7161460-15602

<p>بار کونسل نمبر: 22511-11</p> <p>بار ایسوسی ایشن نمبر: 301</p> <p>رابطہ نمبر: 858545195034</p> <p>ای میل ایڈریس: 77</p>	<p>132038</p> <p>سیریل نمبر:</p> <p>QR CODE</p> <p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>
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بعدالت جناب: سروس ٹریبونل سوات

<p>منجانب: ایڈوائس</p> <p>مسماة رابعہ</p> <p>حکومت سوات</p>	<p>دعویٰ اور خواست: سروس ٹریبونل</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
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### بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سروس ٹریبونل کیلئے استخار علی خان انڈولڈ ڈیپارٹمنٹ 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، جوابات، دعویٰ، اقبال، دعویٰ اور درخواست برائے سرسبزگی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہزارہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ 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 سندر ہے

مقام سروس ٹریبونل حیدر، گٹوخواہ سوات کے لئے منظور ہے۔

ایڈووکیٹ ادستختا: