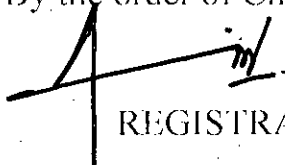


FORM OF ORDER SHEET

Court of _____

Appeal No. 2554/2023

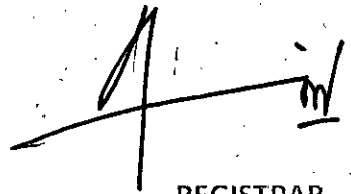
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/12/2023	The appeal of Mst. Farhana resubmitted today by Mr. Iflikhar Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____.
		By the order of Chairman  REGISTRAR.

The appeal of Mst. Farhana 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 submission 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. 3691 /S.I.

DL 24-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Iftkhar Ali Adv.
High Court Swat.

all the objection are removed

*Oftkhar
Ali*

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . 2554 / 2023

Mst, Farhana 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"	
6.	Copies of regularization order and record of service book	"B"	
7.	Copy of memo of appeal	"C"	
8.	Power of Attorney		
9.	Wakalat Nama		

Appellant

Mst. Farhana فرحانہ

Counsel

Iftikhar Ali Khan

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. _____ / 2023

Registry No. 9409

Date 24-11-2023

Mst. Farhana W/o Muhammad Anwar R/o Shaltalo, Tehsil
Charbagh, District Swat. Lady Health Worker (LHW) (BPS-05).
Place of Posting Shaltalo Tehsil
Charbagh District Swat ... Appellant

- VERSUS -

1. Government of Khyber Pakhtunkhwa through Secretary Health at Peshawar.
2. Director General Health Services, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Health Officer, Swat at Gulkada, Saidu Sharif, Swat.
4. District Account Officer Swat at Saidu Sharif, Swat.
5. Finance Officer, LHW Program, Khyber Pakhtunkhwa, at Peshawar.

... Respondents

Appeal Under Section 4 of the Service Tribunal Act, 1974.

Respectfully Sheweth;

1. That appellant is the resident of District Swat and was initially appointed as LHWs in the National Program Family Planning & Basic Health, Khyber Pakhtunkhwa (Copy of appointment order is annexure A).
2. That after fulfilling all the codal formalities, appellant joined her service and perform her duties with zeal and devotion and no single complaint had ever been made against her in the entire service till now.

- (2)
3. That later on services of the appellant was regularized under Regulation of LHW's Program & Employees (Regularization & Standardization) Act, 2014 and entries in the service book was made in this regard (Copies of regularization order and record of service book are annexure B).
 4. That arrears i.e. (pay & allowance) from the period 01-07-2012 to 30-11-2015 were paid to other LHW's / LHS's of the same department, so appellant also knocked the doors of this high off for her redressal. It is pertinent to mention here that entry were made in the service book of the appellant regarding the payment of arrears but till now not a single penny has been paid to the appellant and uptill now the arrears to the tune of Rs. 1,63,866/- from 01-07-2012 to 30-11-2015, is outstanding against the department / respondents.
 5. That the appellant time and again requested the concerned DHO, Swat, for payment of the subject arrears, which was turned down and the appellant has not yet been paid the same, furthermore, the appellant have been directed to approach this office.
 6. That thereafter, the appellant filed department appeal to respondent No. 2, vide office diary No. 24836 dated 25-07-2023, however, the grievances of appellant has not been redressed and no opportunity of hearing has been provided to the appellant. Thus, after completion of the specified period, the appellant approaches this Hon'ble tribunal inter alia on the following grounds (Copy of memo of appeal is annexure C).

GROUND:

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

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 is 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.

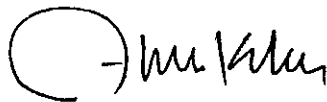
Any other relief which is otherwise deemed proper, lawful, efficacious may also be granted in favour of appellant.

***Appellant**

Mst. Farhana

فرحانہ

Counsel:



Iftikhar Ali Khan

Advocate High Court

- Viii. That respondent are not authorized to deny/ refuse the payment of arrears / allowances to appellant.
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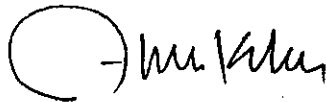
Any other relief which is otherwise deemed proper, lawful, efficacious may also be granted in favour of appellant.

Appellant

Mst. Farhana

فرحانہ

Counsel:



Iftikhar Ali Khan

Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Farhana Appellant.

Versus

Govt: of KP and others. Respondents.

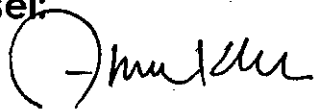
Certificate

It is certified that no such like other service appeal has earlier
been filed before this Hon'ble Court.

Appellant

Mst, Farhana فرحانہ

Counsel:



Iffikhar Ali Khan

Advocate High Court

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

Service Appeal No. _____ / 2023

Mst. Farhana.

... Appellant

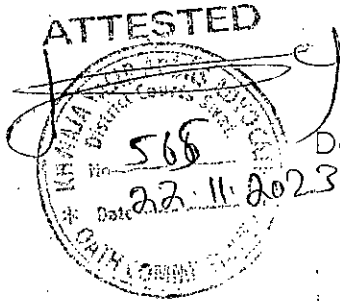
- VERSUS -

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.



Deponent:

فرحان
Farhana

Identified By Counsel:

Iffikhar Ali Khan
Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Farhana

..... Appellant

Versus

Govt: of KP and others.

..... Respondents

Address of Appellant:

Mst. Farhana W/o Muhammad Anwar R/o Shaltalo, Tehsil Charbagh 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, Farhana

فرحانہ

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

حکومت پاکستان

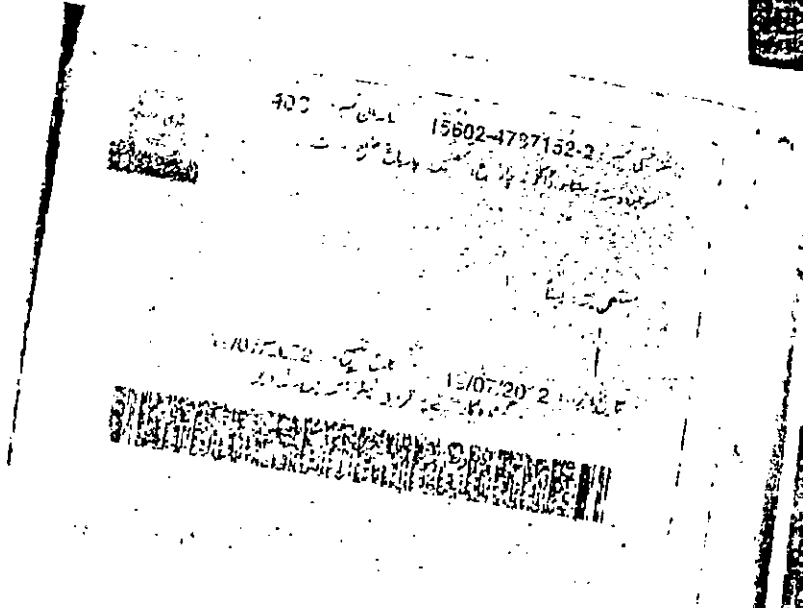
15602-4797152-2



پیشکش پروگرام برائے خاندانی

(9)

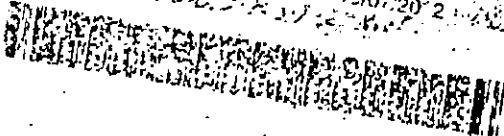
7/19/2019
Attested
A. Hussain
ملاقات کی تاریخ 19/07/2019
مقام: لاہور



400

15602-4797152-2

19/07/2022





پیشکش پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

ڈسٹرکٹ پروگرام ایسی ٹیمیں بنانے کی تیاریاں

15/4/2006

پیشکش پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

پیشکش پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

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پیشکش پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

ایگزیکٹو ڈسٹرکٹ آفیسر ہیلتھ

Executive District Officer (Health) District Swat.

ایگزیکٹو ڈسٹرکٹ آفیسر ہیلتھ

ضلع

ضلع

ذاتی نوٹس

ایگزیکٹو ڈسٹرکٹ آفیسر ہیلتھ

Health Department, Khyber Pakhtunkhwa
Lady Health Workers Program

District Programme Implementation Unit, Swat

OFFICE OF THE DISTRICT HEALTH OFFICER, SWAT

NOTIFICATION

In Term of Section 4 (1) read with 1st Provision here under of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Programme and Employees (Regularization and Standardization) Act 2014 Services of the following Lady Health Workers Programme Employees of District Swat Khyber Pakhtoon. Khwa are hereby regularized w. e. f. 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

10

S No	Name of Community Embedded	Father Name	Husband Name	Des:	Date of appointment	FLCF	Name of Catchment Area
1	Night Bi Bi	Shawakat Ali		LHS	01/12/2004		Vill: salanda Snyder Abad
2	Siasat	Sahib Zada		LHW	10/07/1994	BHU Kishawra	Manglawar Swat
3	Nizakat	Bakhat Zada		LHW	12/06/1995	BHU Kishawra	Village Kishawra Fortot.
4	Zakin	Sardar		LHW	02/05/1996	BHU Kishawra	Village Moorad Abad.
5	Shamin Akhtar	Samiullah		LHW	06/08/1998	BHU Kishawra	Jan Abad, Sher Abad Taligram
6	Yasmeen	Muhammad Ghafar		LHW	01/10/1998	BHU Kishawra	Vill Sher Abad Talegram
7	Farhat	F:	Mian Syed Faqir	LHW	26/10/1999	BHU Kishawra	Village Salanda.
8	Zinty	F:	Shah Nazar	LHW	01/03/2000	BHU Kishawra	Village Ghorib Abad Salanda.
9	Shagufta	Muhammad Rahim		LHW	11/01/2003	BHU Kishawra	Village Syed Abad.
10	Farhat	Umar Wahid		LHW	28/06/2004	BHU Kishawra	Village Kishawra Khamba.
11	Bakht Saba	Amir Zada		LHW	28/06/2004	BHU Kishawra	Telegram
12	Sabina	Zia Ullah		LHW	28/06/2004	BHU Kishawra	Taaligram Swat
13	Fatma	Yaqub Khan		LHW	01/07/2004	BHU Kishawra	Mohalla Gil Mern Village Kishawra Swat
14	Asmat	F:	Nairoz	LHW	15/07/2005	BHU Kishawra	Gat Bishband
15	Hazrat Jihna	M Zeb		LHW	15/05/2006	BHU Kishawra	Sair
16	Jihan Ara	M Sardar		LHW	15/05/2006	BHU Kishawra	Village Manglawar Kot Swat
17	Farhana Bibi	M Anwar		LHW	15/05/2006	BHU Kishawra	Village Kishawra Swat
18	Amina	F:	Naseeb Zar	LHW	15/05/2006	BHU Kishawra	Village Shaltolo Kishawra Swat
19	Aaisha	F:	Faramoz	LHW	15/05/2006	BHU Kishawra	Village Spina Oba Malajaba Swat
20	Saima	F:	Bakht Rokhan	LHW	15/05/2006	BHU Kishawra	Salanda Manglawar Swat
21	Naz Begum	Hasmat Ali	Fazal Karim	LHW	15/08/2007	BHU Kishawra	Village Malaku Abad
22	Farzana	F:	Gul Har Udin	LHW	15/10/2010	BHU Kishawra	Sherkat Matay Village Telegram
				LHW	15/10/2010	BHU Kishawra	Manglawar

District Health Officer
Swat At Gulkada

CI

(11)

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

Sub: Issuance of Individual Notification to the Employees of LHWs Programme

In compliance with the decision taken in the meeting under the Chairmanship of Secretary Health Khyber Pakhtunkhwa dated 18/9/2014 and letter No. Nil dated nil of the Provincial Coordinator LHW Programme for F/P & PHC KPK Peshawar, Enclosed Please find herewith Facility Wise Notification of the Employees of LHWs Programme for kind information and further necessary action please.

Similarly in exercise of powers conferred under sub section (2) of the Section ibid, the Community Embedded Employees are placed in the following pay Scales

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

S/
District Health Officer
Swat At Gulkada

No. 11239 /LHW/R/ 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.

J
District Health Officer
Swat At Gulkada

(12)



Health and Age Certificate

Name of Official Farkhara
 Religious Performed Islam
 Resident Village Kishawra P.O. Charbagh Tehsil Charbagh District Swat
 Father Name Naz Muhammad Address Sattalu Kishawra
 Date of Birth (In words & Figure 01-02-1991 (1st February nineteen ninety one)
 Exact high by measurement 5 Feet 2 Inch

Marks of Identification ADP

Signature of Official Farkhara

Signature of Head of Office [Signature] District [Signature]

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

I do not certify this disqualification for employment as a LHW her according to her statement 23 year and by appearance is Twenty three

Left hand thumbs Impression

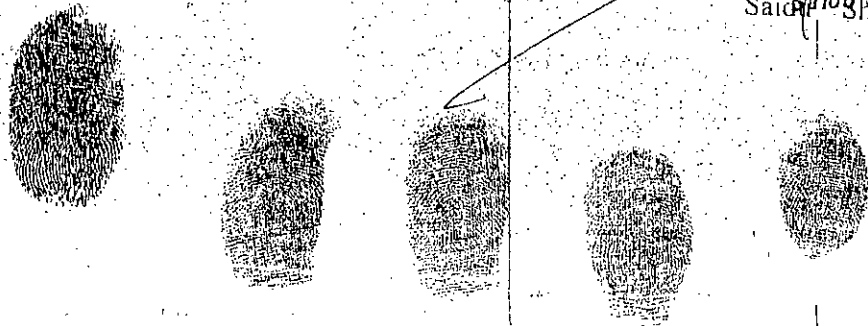
First Figure	Second Figure	Third Figure	Small Figure	Thumb
<u>[Impression]</u>	<u>[Impression]</u>	<u>[Impression]</u>	<u>[Impression]</u>	<u>[Impression]</u>

Taken before [Signature]

Examination Medical Officer,

With Official Stamp
Dated 18/1/14

Medical Superintendent
Swat District Hospital
Swat
18.1.14



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

(13)

Name: Faiz Ahmad

Race: AFGHANI

Residence: ^{Kishnowan Moh}
VIL - SHAL THALO - P/O CHARBACI - I
TEBISIL - CHARBACI - DISTRICT - SWAT



Father's Name and residence:
NOOR MUHAMMAD - VIL - DAKORAK - P/O CHARBACI - I
TEBISIL - CHARBACI - DISTRICT - SWAT



Date of birth by christian era as nearly as can be ascertained: 12201991
one february nineteen ninety one

Exact height by measurement: 5 feet 8 inch

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: Faiz Ahmad


GOVERNMENT OF SWAT
SWAT

(For Use in Police Department Only)

Heirs,

1. _____
2. _____
3. _____

Verification Roll No: _____ dated _____ received back _____

Left Thumb Impression

Qualification	Date	Qualification
English		First Arts
Pushto		B.L Or B.A
Urdu		Pleadership Examination
Plan-drawing		Training School Final Examination
Finger Print		Other qualification
Drill Instructing		
Court Duties		
Reserve Duties		

UACI: 11/11/2010
 SGT exam passed & 1st rank
 obtained 593 marks
 in 2nd of 2010

[Signature]
 District Health Officer
 DISTRICT SWAT

14

1	2	3	4	5			
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 CSR	Pay in Substantive Post	Additional pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government servant
LHW F&A			Rs 1700/-	PM		12/2/2012	[Signature]
LHW 5400-260-13200 BPS-5			Rs 5400/-	PM		7/20/12	[Signature]
Do			Rs 5400/-	PM			[Signature]
			Rs 5400/-	PM			[Signature]

Name and Designation
of head of the office
or attesting officer
in attesting of
minutes 1 to 3

Date of
creation or
appointment

Reason of
termination
(such as
promotion,
transfer,
dismissal,
etc.)

Signature of the
head of the office
or other attesting
officer

Nature
and
duration
of leave
taken

Allocation of period of
leave up to average pay
upto four months for
which leave salary is
debt able to another
Government -

Signature of the
head of the office
or other attesting
officer

Reference to any
order or
purchasing or
award or transfer
or praise of the
Government
Service

Period Government to
which debt able

Appointed as L.H.W. in the No
Order No 2644 on 12/4/2006 at
her arrival Report at B:U/CHUCD-11/2/2014

Service Verified from 12/4/2006 to 30/11/2013

[Signature]
District Health Officer
DIST: SWAT.

On 22/9/2014 issued Notification order for the
Regularization of Staff vide P.O Swat dated 11/11/2014
I.E.F 11/7/2012 in view of ... granted by
P.C LHW Programme ... through
Dated-20/9/2014.

[Signature]
District Health Officer
D.STT: SWAT.

[Signature]
Health Officer
Dist: Swat.

Service Verified from 1/7/2012 to 30/11/2013

[Signature]
Health Officer
Dist: Swat.
30/11/2013
ANN. INC
GRANTED.

Service Verified from 1/12/2012 to 30/11/2013

[Signature]
District Health Officer
Dist: Swat.

[Signature]
District Health Officer
Dist: Swat.

[Signature]
Health Officer
Dist: Swat.
30/11/2013
ANN. INC
GRANTED.

Service Verified from 1/12/2012 to 30/11/2013

(16)

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	Name and Designation of the officer for attesting officer in attesting of columns 1 to 8
L.H.O. BPS S			Rs. 7665			1/7/2015	F.N.	
L.H.O. BPS S			Rs. 8525			1/12/2015	F.N.	
L.H.O. BPS S			Rs. 9850/-			1/7/2016	F.N.	J
do			Rs. 7665					
do			Rs. 8525					
do			Rs. 16270/-			1/7/2016	F.N.	

(17)

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"	Pay of Appointment	Signature of Government servant
	Pay Fixed @ Rs. 6985	Termed under Pay Scales 340-17185				5	
	Pay Fixed @ Rs. 7665	01-2015					
	P.B.P.S. 8590	420-21192				5	
	Pay Fixed @ Rs. 9850	01-2016					
	Date of Next increment by	01-12-2016					

Pay Fixed @ Rs. 6985 - 340 - 17185
 Pay Fixed @ Rs. 7665 - 01-2015
 P.B.P.S. 8590 - 420 - 21192
 Pay Fixed @ Rs. 9850 - 01-2016
 Date of Next increment by 01-12-2016

Accounts Officer
 Pay Fixation Part
 Jaipur

CH-2 BPS-5

(10260-500-25260)

Rs 12260/-

12/11

do-

Rs 12760/-

12/11

9	10	11	12	13		14	15	
				Leave				
Name of Designation of the head of the office to which officers are attached (where in attesting of column 1 to 8)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	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 of the head of the office or other attesting officer.	Reference to any rewarded punishment or censure, or reward or praise of the Government Service
				Period	Government to which debit able			
2017								
Office of the Accountant General (Hyber Pakhtunkhwa) Peshawar Pay Fixed in The R.B.P.S. 2017 10065 Jfo 20065 10022 Jfo 10022 Jfo 10022 Jfo ARCHIVAL OFFICER PAY FIXATION PESHAWAR		1.07.2017 1.12.2017			Paid arrears on a/c of Pay & Allowances. w.e.f 01-07-2012 to 30-11-2015 Amounting to Rs. 163866/-		Finance Officer LHW Program Peshawar 2	
	Pay Revised on 11/2/2017				Services Verified From 11/2/2017 To 30/6/2017		District Health Officer District Swat.	
District Health Officer DISTT. SWAT.	30/11/2017		Annual/Increment Allowed		Services Verified From 11/2/2017 To 30/11/2017		District Health Officer District Swat.	
District Health Officer DISTT. SWAT.	30/11/2017		Annual/Increment		Services Verified From 11/2/2017 To 30/11/2018		District Health Officer District Swat.	

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 3. Basic Health, Khyber Pakhtunkhwa in the year 2005-06.
2. That after fulfilling all the codal formalities, petitioners join their services and perform their duties with zeal and devotion and no single complaint had ever been made against them in the entire service till now.
3. That later on services of the petitioners were regularized under Regulation of LHW's Program & Employees (Regularization & Standardization) Act, 2014 and entries in the service book were made in this regard.
4. That arrears i.e. (pay & allowance) from the period 01-07-2012 to 30-11-2015 were paid to other LHW's / LHS's of the same department, so petitioners also knocked the doors of this High Office for their redressal. It is pertinent to mention here that entry were made in the service books of the petitioners regarding the payment of arrears but till now not a single penny were paid to the petitioners.

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

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

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

Petitioners

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

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

LIST OF ARREARS OF THE PETITIONERS

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

Health Department, Swat
Swat, Pakistan
District Council Swat
Date: _____

الع فرخانة
مسماة فرحانه

الع Maryam
مسماة مريم بي بي

الع Tehra Shah
مسماة جهان صفت

الع Saeed
مسماة روايه

الع Saira
مسماة سائده بي بي

الع Saima
مسماة سائمه

الع Sana
مسماة سنا بي بي

الع Sana
مسماة سنا بي بي

الع Sana
مسماة سنا بي بي

شہداء افضل خان
گواہ شہداء افضل خان

شیر افضل خان ولد عزیز الرحمن

شناختی کارڈ: 3-7538465-15602

شہداء افضل خان
گواہ شہداء افضل خان

امیر علی خان ولد شیر علی خان

شناختی کارڈ: 7-161460-15602

21

بار کونسل نمبر: 2251-11-11-11	سٹرکٹ بار ایسوسی ایشن سوات
بار ایسوسی ایشن نمبر: 30	ڈسٹرکٹ بار ایسوسی ایشن سوات
رابطہ نمبر: 03475-9514585	ڈسٹرکٹ بار ایسوسی ایشن سوات
ای میل ایڈریس: ۷۷	ڈسٹرکٹ بار ایسوسی ایشن سوات

بعدالت جناب: مسروس ٹریبیونل بحکم پشاور

منجانب: ایڈوانٹ	دعویٰ اور خواست: مسروس ایڈوانٹ
صعہ ضریحانہ	علت نمبر:
مورخہ:	مورخہ:
جرم:	جرم:
تھانہ:	تھانہ:

بابت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام مسروس ٹریبیونل کیلئے افسٹر علی خان البروکس ہائی کورٹ کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب، دعویٰ، اقبال دعویٰ اور درخواست برائے سرسنگی مقدمہ، منسوخی ڈگری کی طرف، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے ایمین 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 ہتھ مارہ 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 ہرجانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری کی طرف ہونے کے صورت میں وکیل صاحب ڈسٹرکٹ ٹریبیونل ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سندر ہے

مقام مسروس ٹریبیونل حیدرآباد خواہ پشاور کے لئے منظور ہے۔

ایڈوکیٹ دستخط:

المقوم: 22/11/023

ایڈوانٹ نذیر علی مختار خاں جاوید علی